Dear SLO County Planning Commission Members,

I apologize for this 11th hour appeal . . .but here it is:

Back on February 2, 2016 I sent to you the Morro Coast Audubon Society's letter opposing the Phillip's 66 proposal. As you deliberate on the permit conditions on Wednesday October 5th please carefully consider the adequacy of oil spill responsiveness.

A sobering critique of oil spill response efforts was delivered in a new study released December 2015 by the National Academy of Sciences concludes that responsive efforts are not adequate when it comes to spills involving crude from Canadian tar sands. The reports main message is that this thick type of oil called diluted bitumen, or "dilbit" initially behaves like conventional oil in the first few days following a spill, but then quickly degrades into a substance so chemically and physically different that it defies standard spill responses.

The report recommends tailoring spill response plans by oil type – a stark contrast to the reassurances often given by energy companies that dilbit doesn't need special regulations. This report punches holes in the oil industry's "oil-is-oil" talking point – making it clear that diluted bitumen is different beast altogether and needs to be treated as such.

The authors, a collection of nearly a dozen oil spill experts from academia and industry in the United States and Canada state, "When all risks are considered systematically, there must be a greater level of concern associated with spills of diluted bitumen compared to spills of commonly transported crude oils." (1).

"These concerns include not only minimizing a number of possible long-term environmental impacts, but also protecting the safety of responders and the public during and after the spill response," the study concluded.

The National Academies committee had previously published a related report in 2013, responding to a Congressional inquiry that concluded that dilbit is not more prone to spillage than conventional crudes.

(1). National Academies of Sciences, Engineering, and Medicine. Spills of Diluted Bitumen from Pipelines: A Comparative Study of Environmental Fate, Effects and Response. Washington DC: The National Academies Press. 2015.

Respectfully submitted,

Doug Tait, Conservation Chair
Morro Coast Audubon Society