



June 1, 2014

To: The Citizens' Coalition to Ban Toxic Dispersants
Riki Ott, PhD
Energy & Democracy Program, a project of Earth Island Institute
Berkeley, CA

Re: SUPPLEMENT TO PETITION FOR RULEMAKING TO AMEND NATIONAL CONTINGENCY PLAN (NCP) Under the Clean Water Act, 33 U.S.C. § 1321(d)(2)(G) and the Administrative Procedures Act Title 5. Sec. 553(e)

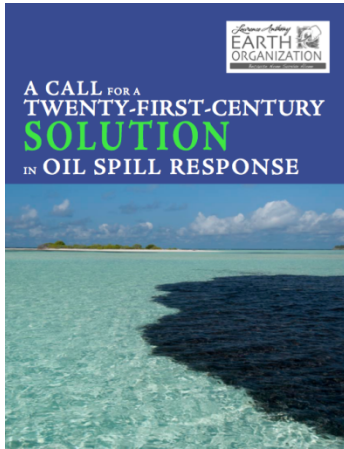
Dear Dr. Ott and Citizens' Coalition;

The Lawrence Anthony Earth Organization U.S. Chapter hereby signs on to and expresses concurrence with The Citizens' Coalition to Ban Toxic Dispersants' Supplement to the Petition for Rulemaking to Amend the National Contingency Plan (NCP).

An NCP with outdated science and a difficult to manage and navigate bureaucracy is standing in the way of a clean and protected Gulf of Mexico, Alaska/Arctic and thousands of other toxic spill sites throughout Earth's lands and waters. We recognize that many members of the US EPA, interagency response community and industry professionals do care and are looking for a better way forward and we want to help. We believe that Dr. Riki Ott and team have made very constructive proposals that will enhance the NCP and the capability of all interagency representatives tasked with protecting the chemistry and biological integrity of our lands and waters.

While the LAEO Science & Technology Advisory Board will be reviewing proposed NCP revisions in detail and making complete recommendations, we would like to express our strong support and general concurrence with Dr. Ott's Petition Supplement dated 2 June 2014, to the EPA Administrator. This work completely aligns with our goals for abolishing chemical dispersant use as part of the NCP and getting safe, non-toxic, and cost-effective oil-spill response plans in place for all future spill incidents in the United States and around the world.

In April of 2013, (revised and updated 2014) we published a research paper that expresses our concerns re chemical dispersant use in oil spill response and contains reform proposals:



The material contained in this analysis and guide is a constructive offering for oil and energy industry professionals, regulators and concerned citizens of every oil-producing nation in the world to better manage potentially contaminated ecosystems. The work brings a new analysis and assessment of oil-spill response and offers suggested alternative technologies for replacing dispersant chemical application in an oil spill or deep-water drilling crisis like the 2010 BP blowout and oil spill in the Gulf of Mexico.

While we believe that there is an urgent need to eliminate chemical dispersant use, we also strongly advocate that equal effort and scientific resources must be applied to finding safe and non-toxic oil spill cleanup technologies to replace these horrific and damaging oil spill response ‘tools’. There are no plans in place that will truly cleanup spills in the Arctic and further deep water drilling spills in the Gulf of Mexico which is of utmost importance to resolve in our NCP.

We look forward to engaging in further collaborative work on this subject with some of your experts to resolve this issue and forming a stronger alliance.

Sincerely Yours,

Diane Wagenbrenner
VP Operations & Public Information
Lawrence Anthony Earth Organization U.S.