

Barbara Keller

I have long been studying the, what I believe to be, impossibility of cleaning up a spill in our San Juan Islands, given the currents, tides and intricate coastlines. And I certainly don't see us giving up fossil fuels any time soon, no matter the supposed concerns over climate change. That means that we have to take what preventative steps we can. We humans have not been good at doing that. You have the opportunity to do one of the few things that can make a change NOW.

I support the new decommissioning requirements for out of service oil storage tanks and oil transfer pipelines, requiring additional seismic protection measures for oil storage tanks and transfer pipelines to help prevent oil spills during earthquakes, and updating the requirements to mitigate the impacts of spills from oil transfer operations.

To implement ESHB 1578, Reducing threats to southern resident killer whales by improving the safety of oil transportation, this rule should also:

- 1) Require all secondary containment structures (that prevent spilled oil from reaching waters of the state) to withstand seismic forces;
- 2) Require all oil transfer operations to be pre-boomed (when safe and effective to do so) and eliminate the Rate B loophole that allows oil transfers at 500 gallons per minute or less to occur without pre-booming;
- 3) Restrict all oil transfer operations to daylight hours or, at the very least, restrict all oil transfer operations to daylight hours when it's not safe and effective to pre-boom.