

Mary Ferm

As the granddaughter of marine biologists who worked at Friday Harbor labs, and then retired on San Juan Island, I am very concerned about the dangers presented by outdated oil spill containment systems for ships passing around the San Juans. We also now know a lot more about possible earthquakes in our area than we did in 1994 when standards were set, and need to take appropriate measures to limit the damage from them. I strongly support the suggestions below:

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.