

Martha Hall

I support closing loopholes in the existing rulemaking and added further protections as recommended because I live in Anacortes and I see the threats posed by our two refineries everyday. I know these refineries and the tanker traffic they generate could mean the end of orcas in Puget Sound. One very unfortunate accident happening at the wrong time, which is when accidents often happen, and we could easily have serious problems. I watch the tankers from our house as they go in and out of the refineries all day and night. They are enormous. The noise they make wake me up at night.

I Also look out from our house and shoreline and see the tankers anchored off Guemes Island waiting to load and unload crude and refined oil and oil products. I see tankers being loaded and unloaded at the refinery docks. All of this loading and unloading is going on next to Padilla Bay which has the second largest eelgrass beds on our west coast, second only to one in Alaska. An oil spill in any of these places would be a disaster for Padilla Bay and all of the marine resources found there, fish, birds, shellfish. I also know the extreme currents we have in these same areas around Fidalgo and Guemes Islands and the mainland. We could sail in our sailboat for hours headed towards Anacortes in Guemes Channel and never make much headway because of the strong current. We watch the current from this current from the windows of our house as the ferry fights to cross the channel. I've also spent time on the beaches of Guemes Island and seen the fierce winds and waves on a north or northeast wind.

This was the wrong place to build refineries and the wrong place to be transferring oil and oil products. We can't seem to get rid of these refineries, but we can at least protect our orcas and other marine resources that can be destroyed by these refineries.

The WA Department of Ecology's draft rule closes a major loophole that exists in current booming requirements. Until this is addressed, oil spills during oil transfers are dangerous.

For these orcas, this loophole could be a matter of life and death. The current requirements for advance notice of oil transfer operations helps with the regulation of these. Pre-booming oil transfers is extremely important. These rules need to address transfers of less than 500 gallons per minute as well as those over 500 gallons per minute. Those under 500 per minute could turn out to be just as deadly.

New decommissioning requirements are also needed for out-of-service oil storage tanks and oil transfers. More protections are needed to prevent oil spills during earthquakes which we should expect and plan for. Seismic updates for all transfer pipelines and storage tanks are needed including secondary containment systems. Most of the refinery and bulk oil handling facilities in our state were built before 1994. This means they pose a serious threat. We have too many aging facilities who can and do pollute Puget Sound. More and better requirements are needed to make these safer.

I hope the Department of Ecology will do whatever is possible to add further protections like those in this proposal. Our state is spending millions and millions of dollars to try to save our resident orcas because Washingtonians care about these orcas. Ecology must be part of this effort.

There is a good chance that these orcas will disappear from our waters in our lifetimes IF we do not

do everything possible to reduce the many threats they face every day they spend time in Puget Sound. We have done a very poor job of keeping our waters clean and healthy in the past. We need to do much better in the future. This draft rule may be the one thing that saves orcas in case of an accident during an oil transfer operation or an earthquake.

Thank you for this opportunity to comment,
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