

# Lisa Lawrence

Thank you for leading a process with interested stakeholders to amend regulations associated with facility oil handling standards and vessel oil transfer advance notice and containment requirements to implement ESHB 1578, improving oil transportation safety and reducing threats to southern resident killer whales, people, marine mammals, salmon and all who live in and around the Salish Sea and beyond.

I support requiring additional seismic protection measures and retrofits for oil storage tanks and transfer pipelines, new decommissioning requirements for out-of-service oil storage tanks and oil transfer pipelines, additional advance notice of oil transfers, and disclosure of the type, origin and characteristics of the crude oil being transferred.

However, this rulemaking should also:

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

Thank you for your efforts to improve the safety of oil transportation in Washington State.