

# Richard Lyles

Thanks so much for considering my comments on Chapter 173-180 WAC, Facility Oil Handling Standards and Chapter 173-184 WAC, Vessel Oil Transfer Advance Notice and Containment Requirements.

As a resident of the San Juan Islands, I am deeply concerned about the risk to my community and our way of life that is posed by potential oil spills! Every single spill, large or small, has economic impacts, environmental impacts, cultural impacts, and human impacts.

Decommissioning requirements for out-of-service oil storage tanks and oil transfer pipelines must include additional seismic protection measures for oil storage tanks and transfer pipelines to help prevent oil spills during earthquakes. Importantly, I also ask that you update 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 must 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.

Respectfully,

R. Brent Lyles  
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