



March 1, 2023

Brittany Flittner
Department of Ecology
Spill Prevention, Preparedness, and Response Program
PO BOX 47600
Olympia, WA 98504-7600

**Comments re: ESHB 1578, Reducing Threats to Southern Resident Killer Whales
by Improving the Safety of Oil Transportation**

Dear Ms. Flittner,

I am a resident of San Juan Island where the SRKWs are considered our icon as well as indicators of the health of the Salish Sea. They are already in jeopardy for a myriad of human-induced factors, but then add one more oil spill and it could be the end of their population.

This is a preventable tragedy. It's up to us to tighten the regulations that are put into place to prevent spills from happening, or if they do happen, to prevent them from causing further harm.

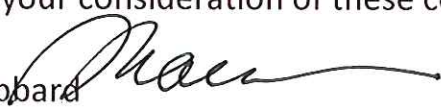
Pre-booming for ALL over-the-water oil transfers (the only exception being containment of highly volatile materials) is how we Improve the Safety of Oil Transportation and Reduce Threats to SRKWs (to reference the name of ESHB 1578).

To give ESHB 1578 teeth and to be most effective, it 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.

In addition, 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.

Thank you for your consideration of these comments.


Ms. Shaun Hubbard
PO Box 805
Friday Harbor WA 98250