

Janet Alderton

I am very concerned about the negative impacts of fossil fuels that are spilled on our lands and into our waters. Spilled oils can spread rapidly unless they are contained by barriers, such as booms that are put in place before oil is transferred. I oppose the 500 gallon per minute threshold for the pre-booming requirement. There should be no threshold. When oil will be transferred in marine waters, there must be pre-booming.

I also support the new decommissioning requirements for out of service oil storage tanks and oil transfer pipelines as well as requirements for additional seismic protection measures for oil storage tanks and transfer pipelines to help prevent oil spills during earthquakes.

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.