

# Julie Carpenter

I'm writing to comment on the proposed draft Chapter 173-187 WAC - Financial Responsibility.

1. Setting dollar-certain limits to liability is instantly dated, and is contrary to the rule of law and the need for corporations to take fiscal responsibility in exchange for the license to do business and make (record) profit. The \$300 million maximum financial responsibility requirement for facilities is not enough.

2. Washington regulations should lead our county in increasing requirements for corporate financial responsibility. This must include funds to prepare for and mitigate after oil spill impacts, including those related to natural disasters, which are predictable in Washington. Our regulations should include collecting funds from company profits (aka taxation) to offset unintended consequences of carbon based business models and technology, including remediation of air quality, adverse health effects and predictably increasing multi-systemic infrastructure, ecological, humanitarian and other costs related to global climate change.

This Draft does not meet the state mandate that requires Ecology to consider the cost of cleaning up the spilled oil and the damages that could result from the spill. The draft rule exclusively addresses the commercial availability and affordability of financial responsibility. This amounts to protection of insurance and oil industry profits, superseding financial responsibility for costs and damages related to oil spills. We must not let the limitations or costs of for-profit business insurance supercede proper governance of corporate actions within our state.

3. All foreign fuel producer/processors/retailers doing business in Washington should be required to have their corporate entity licensed in the U.S. with corporate responsibility guaranteed within Washington State. Foreign business and operation permits should be held to higher standards of liability for all clean up costs. Washington must regulate sufficiently to insure that foreign companies do not rely upon local taxpayers to pay for clean up costs.