

# Nancy Shimeall

Please consider my input as a concerned member of the public on the proposed draft Chapter 173-187 WAC - Financial Responsibility. Please address the following issues in the final rule:

1. The \$300 million maximum financial responsibility requirement for facilities is not enough. Refineries, pipelines, and other bulk oil handling facilities should be required to have the same financial responsibility requirements as tank vessels and barges: \$1 billion.
2. Financial responsibility requirements must prioritize compensation for oil spill impacts over oil industry profits.

This rulemaking did not meet the state mandate that required Ecology to consider the cost of cleaning up the spilled oil and the damages that could result from the spill. According to Ecology, a large spill could cost the state \$10.8 billion and 165,000 jobs. The draft rule only addresses the commercial availability and affordability of financial responsibility. This allows oil industry profits to supersede the financial responsibility requirements needed to address the costs and damages from an oil spill.

3. Canadas Trans Mountain Pipeline (Puget Sound) should have a per barrel fee that is based on the higher oil spill response and damage costs for spills of tar sands products. The per barrel cost for the Trans Mountain Pipeline should be increased to \$60,153 per barrel.