

# Miah Whiteaker

Please pay mind to the concerns raised by members of the public regarding the proposed draft Chapter 173-187 WAC - Financial Responsibility is crucial. This seem glaringly obvious. I implore you to swiftly address the following issues in the final rule:

1. The current \$300 million maximum financial responsibility requirement for facilities falls short. Refineries, pipelines, and other bulk oil handling facilities should meet the same financial responsibility standards as tank vessels and barges, set at \$1 billion.
2. Prioritizing sufficient compensation for oil spill impacts over industry profits is crucial in setting financial responsibility requirements. There should be no question here.

The current rulemaking fails to meet the state mandate, neglecting to consider the cost of cleaning up spilled oil and the resulting damages adequately. Ecology's estimation of potential costs from a large spill underscores the urgency, yet the draft rule focuses solely on the commercial availability and affordability of financial responsibility, potentially allowing industry profits to override necessary spill-related costs and damages.

3. The Trans Mountain Pipeline (Puget Sound), transporting Alberta tar sands to Washington State's northern refineries, should incur a per barrel fee reflecting the higher spill response and damage costs associated with tar sands products. Increasing the per barrel cost for the Trans Mountain Pipeline to \$60,153 aligns more accurately with the potential spill-related expenses.