

Steven Smith

Dear Department of Ecology, State of Washington,

Thanks for your consideration of public comments, and especially the points elucidated below, in regards to Chapter 173-187 WAC and repeal of Chapter 317-50 WAC

1. The proposed \$300 million maximum financial responsibility requirement for Class 1 facilities is not enough. At the very least, refineries, pipelines, and other bulk oil handling facilities should be required to have the same financial responsibility requirements as tank vessels and barges: At least \$1 billion per facility.

Please look at the history of fossil fuel extraction, refining and transportation and note the exorbitant costs of environmental accidents. For instance the Alaska oil spill in Prince Williams Sound (Exxon Valdez Oil Spill) resulted in Exxon spending an estimated \$2 billion cleaning up the spill and a further \$1 billion to settle related civil and criminal charges. Our environment, here in the Salish Sea and surrounding land areas, is every bit as sensitive as the Alaska area affected by the Valdez spill, and the cost in today's dollars is likely to be much higher than the \$3 billion spent by Exxon. Truly, \$300 million would be only "a drop in the bucket" as far as possible monetary damages from an incident!!!

2. Financial responsibility requirements should prioritize sufficient compensation for oil spill impacts over oil industry profits. Tank vessels and barges can comply with the \$1 billion financial responsibility requirement through P&I (protection & indemnity) clubs or mutual insurance associations. Class 1 facilities could do the same.

They really must be held to this higher financial liability standard in the event of a catastrophic event, otherwise who will end up paying to remediate the damages....the taxpayers, as usual! Big oil, and all their ancillary services, need to at least "ante up" and take care of potential disasters created by their activities.

3. Canada's Trans Mountain Pipeline (Puget Sound), which transports Alberta tar sands to Washington State's northern refineries, should have a financial responsibility requirement that is based on a higher per barrel amount in order to address the higher oil spill response and damage costs for spills of tar sands products. The basis for the Trans Mountain Pipeline's financial responsibility requirement per barrel transported should be increased dramatically, so that the possibility of any potential spill is covered. If this is done, then it should be obvious to most folks that this tar sands oil is not a financially viable product. It should also be noted that tar sands pipelines have experienced hundreds of ruptures over the past decade, spilling more than one million gallons of oil that has polluted rivers, wetlands, and threatened wildlife. We need to get away for this very polluting and expensive fossil fuel source and move toward safer alternatives.

Thanks again for your consideration and thoughtful decision making in regards to the above concerns.

Sincerely,

Steve Smith
Concerned Citizen of WA State