

Shaun Hubbard

Also attaching file containing same comments as submitted below. File name:

COMMENTS RE: Rulemaking - Chapter 173-187 WAC and repeal of Chapter 317-50 WAC
Submitted via the Public Comment Form on Department of Ecology website

I am a resident of Seattle and San Juan Island and co-founder of San Juan Islanders for Safe Shipping. Our group advocates for responsible shipping in the Salish Sea because we are surrounded by water. Our islands are in the middle of a roundabout of vessel traffic, and we feel very vulnerable. The environment is our economy and way of life, and we look to our State's Department of Ecology to help us protect it.

Thank you for the opportunity to comment on the financial responsibility requirements of Class 1 facilities.

The key word here is "responsibility". Mistakes happen. If you make a mistake, own it and fix it. Parents teach this to their children as early as toddler age, as in "Clean up your toys, please".

I wish this weren't true, but oil spills do happen. An oil spill is a very very big mistake. Whoever spills that oil is responsible and should be held accountable. They need to clean it up and pay for that cleanup -- ALL of it, because this spilt oil will negatively impact everything it touches, environmentally and economically, for a very long time. The oil from the 1989 Exxon Valdez spill is still present and causing harm. 35 years ago, the total cost for that disastrous mistake was \$7 billion. Exxon retrieved only 8% of the spilt oil and paid only 1% in punitive damages. Meanwhile, an entire community's economy and environment were devastated and left irreparable. Where is the responsibility there?

Class 1 facilities are as responsible for an oil spill as the vessels that carry the product. Without these facilities, there would be no tank vessels and barges. Therefore, requiring the same financial responsibility from Class 1 facilities as for vessels -- \$1 billion per facility ♦ is a fair ask. But really, it's not enough and we all know that \$300 million is definitely not enough. Your own analysis states that a significant oil spill could cost \$10.8 billion and 165,000 jobs -- based on 30-year-old estimates!

To really be serious about protecting the ecology of our state, the financial responsibility needs to be much higher. The oil industry can afford it. The average taxpayer cannot. By not requiring full financial responsibility for Class 1 facility oil spill damages, our state is basically giving money to the oil industry. Money that we will never see. If an oil spill happened, we would be left with the check and having to live with the devastating consequences. Ecology cannot let this happen to our state.

Please require Class 1 facilities to cover the full costs to clean up an oil spill based on current and future numbers, especially in light of the Trans Mountain Pipeline expansion soon to bring ever more costly risks to our state.

Thank you.

TO: Diana Davis
Department of Ecology, Northwest Regional Office
Spill Prevention, Preparedness, and Response Program
P.O. Box 330316, Shoreline WA 98133-9716

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Ms. Shaun Hubbard
PO Box 805, Friday Harbor WA 98250