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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: \$1 billion per facility.

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.

Canada's Trans Mountain Pipeline (Puget Sound), which transports Alberta tar sands to Washington State's northern refineries, 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 at least \$60,153 per barrel.