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Date: 11/24/2014 02:29 PM
Subject: Comment on the Phillips 66 Santa Maria Refinery Rail Spur Project

24 November 2014
Mr. Murry Wilson
SLO Planning Department

Dear Mr. Wilson;

I write to comment on the Recirculated Environmental Impact report for the Santa Maria Refinery Rail Spur Project that proposes to bring daily a second high hazard flammable oil train through Davis, California. The railroad passing through Davis bisects the heart of the town. A rail disaster here like the one that occurred in Lac Megantic Quebec would be devastating to our city. It is not too strong to say it might destroy the city as we know it.

In the face of this unprecedented risk to our city, it is essential that the infrastructure is designed to expose us to as small risk as possible to our lives and property. Bakken crude is like a bomb: one hundred cars a day of bomb-like oil passing through through our town each day.

I believe the DEIR for the project fails to accurately account for this risk, not only to Davis but also to other cities along the route through which these high hazard flammable trains will pass. The DEIR employs an apparently flawed (even to the most naive observer) analysis and concludes that the probability of accidental release of crude oil from a train will occur only once in more than a hundred years. This is ridiculous. If this were the case then it would not be true that in 2013 alone, oil trains spilled more than a million gallons of crude oil, nearly twice as much as in the last forty years combined. In other words, this rosy accident scenario is already disproved by accidents that have already occurred and are occurring as we speak.

Please insure that the EIR contains an accident probability assessment that is real, not one cooked up by parties with obvious financial conflicts of interest.

Yours truly,

Mont Hubbard
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Get real.! Someone with an actual accident prediction expertise needs to analyze this, not the oil companies and railroads who have an obvious conflict of interest. The DEIR employs a flawed quantitative analysis to conclude that the probability of an accidental release of crude oil from a train is only one in 111 years.

In the face of this unprecedented risk, it is important that the infrastructure and facilities transporting and processing these feedstocks are specifically designed to present minimal risk to life, public and private property, and the environment. In particular, officials entrusted with protecting public health and safety must ensure that the hazards from these projects are fully and accurately assessed, and the identified risks are mitigated to the fullest extent possible by law.

HUM-01

HUM-02

HUM-03