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Date: 11/23/2014 08:03 PM  
Subject: Comments on Recirculated DEIR Phillips 66 Rail Spur

Comments on Recirculated DEIR for Phillips 66 SMR Rail Spur Project

The proposed Rail Spur Project is out of touch with the future wellbeing and the health of our community. The proposal and its impacts listed in the revised DEIR are only a fraction of the project's true impacts, which include all additional crude oil transport risks along UPRR tracks and through pipelines undercutting our county's lands and infrastructure. Once built, the Rail Spur Project and with the continued financial investment of Phillips 66, the project will assure the Santa Maria Refinery will continue to directly raise the risk of Cancer in our community, will continue to threaten our community's ability to conduct regular business, will contribute to Global Climate Change (in direct opposition to California's progress toward a Clean Energy future), will continue to decrease our county's ability to attract visitors, will continue to decrease property values on the Nipomo Mesa, and will continue to consume and discharge over 1100 acre-feet of unusable and polluted groundwater to the ocean... every year, year after year. Every element of this project elevates environmental risk to our county, and most risks have already been isolated within the limited scope of the Revised DEIR. As written, the revised DEIR provides enough facts to support the "No Project" alternative. However, the document could be further improved with the following suggestions:

SNB-01

- The Guadalupe Oil Field at the Nipomo Dunes failed to detect 12 million gallons of diluent into the dunes, beach, groundwater, and the Pacific Ocean. Given the close proximity, geological similarities, and potential risks posed by similar pipelines at the Phillips 66 SMR, the revised DEIR should include an analysis of the impact on SLO County roads and natural resources from the excavation and evacuation of a spill similar to the Unocal spill on the SMR property. The Guadalupe Oil Field case is so similar to the risks posed on the SMR property, the real-world impacts of the Guadalupe spill on surrounding communities should be directly referenced and similarities should be quantified in the County's CEQA analysis of the SMR Rail Spur Project.
- Increased consumption of shared groundwater resources on the Santa Maria Groundwater Basin, regardless of the refinery's water rights to up to 1400 a.f. per year, are significant during a historical drought. The city of Pismo Beach and the South SLO County Sanitation District are exploring the use of reclaimed water, while the most accessible possible re-use being distribution to construction trucks. The water used for construction of the Rail Spur should be described as "less than significant with mitigation" in this CEQA analysis, and the corresponding mitigation measure for this impact should be for the Phillips 66 Rail Spur Project to utilize the nearest source of reclaimed water during construction.
- The list of project impacts includes an increase in groundwater consumption, which must also include an increase in ocean outfall. The County's CEQA analysis should include a description of how increased ocean outfall will be addressed by Phillips 66.
- The list of project impacts should include a calculation of Total Carbon Emission to the atmosphere from the crude to be processed at SMR should the Rail Spur be completed. The calculation should estimate Atmospheric Carbon release during Rail Spur construction and during crude processing. The list should also include an estimate of projected annual Carbon release to the atmosphere after final use of the crude expected to be processed at Phillips 66 SMR.

SNB-02

SNB-03

SNB-04

SNB-05

Kind regards,  
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