

## People of Faith for Justice

P.O. Box 6359, Los Osos, CA 93412

www.PeopleofFaithforJustice.org

November 24, 2014

Mr. Murry Wilson  
SLOCO Planning Department  
San Luis Obispo, CA 93401

Re: Comment on October, 2014, DEIR on Phillips 66 Rail Spur Project

Dear Mr. Wilson:

This letter is written on behalf of the People of Faith for Justice (PFJ), an interfaith voice for social and environmental justice on the Central Coast. With widespread support from faith communities and individuals throughout our county who share our values, PFJ promotes an enhanced quality of life, peace, and justice through ongoing education, strategic advocacy, and direct action. Our work has four areas of focus, namely, economic justice, human/civil rights, environmental justice and peace/nonviolence.

It is from this background that we approach the issue of the Phillips 66 Rail Spur Project. After study of this project, we have serious concerns regarding its impact upon the environment at the site of the Rail Spur as well as the resulting impact it would bring to our greater community. These greater community impacts would be directly caused by the planned 1.5 mile long crude-by-rail trains that would begin to roll through our county on a daily basis. Specifically our concerns are as follows:

This project has several Class I impacts, i.e., impacts which are significant and cannot be mitigated to less than significant. These impacts seriously threaten the health and safety of the residents near the Phillips 66 site, as well as residents throughout our County. Further, there are numerous Class II impacts, i.e., impacts which are significant but can be mitigated to less than significant. For many of these the County cannot insist upon mitigation because they occur along the Union Pacific Railroad line, which is Federally exempt from County jurisdiction.

PFJ-01

These Class I and Class II impacts threaten the physical health of the residents of San Luis Obispo County in three major ways:

1. Significantly increased particulate air pollution. Especially at risk are the children of San Miguel, Templeton, and Santa Margarita whose public schools are within close proximity to the railroad track. This is also true for students in San Luis Obispo who attend CalPoly, San Luis Obispo High School and Los Ranchos Elementary School. This health risk will be chronic and may well increase the incidence of asthma, lung cancer and cardiopulmonary disease. There may well be other health risks that develop from the increase in particulate air pollution caused by the crude-by-rail trains. This air pollution will exceed regulated legal limits but the County has no power to mitigate this impact due to Federal exemption of UPRR.

PFJ-02

2. Death or injury due to explosion and fire caused by train accident/derailment. The citizens who would be exposed on a daily basis to this threat number in the tens of thousands as these trains would travel through the middle of every town along the UPRR corridor from our northern county line to the Phillips 66 Project site. The potential for loss of human life and the potential scale of property loss in the event of an explosion or fire is truly breathtaking. With respect to mitigating these risks, the County has absolutely no power to do so, again due to Federal exemption of UPRR.

PFJ-03

3. Environmental destruction from leaks, explosions, fire. The areas at risk for environmental destruction include the length of the Salinas River bed, agricultural areas, numerous rivers and streams which the UPRR crosses, as well as the beach and marine ecology in the southern part of our County, close to the Phillips 66 Project site. Except for those leaks, explosions, fires which might occur at the site itself, the County cannot insist upon any risk mitigation due to Federal exemption for UPRR.

PFJ-04

The more PFJ's Board members have learned about the issues involved in the Phillips 66 Rail Spur Project, the more concerned we have become. This is a project which has many immediate costs and potential costs to the residents of our County with no gain whatsoever to those residents to help offset these costs. The only gain from this project would be realized on the balance sheet of Phillips 66. All of the risks and losses caused by this project will be born by the residents of San Luis Obispo. This Rail Spur Project is not socially responsible, environmentally responsible, or

PFJ-05

economically responsible. Further it has the potential of depriving many people of their lives in the event of a crude-by-rail accident/derailment and this alone makes it absolutely unacceptable.

People of Faith for Justice urge the "No Project" Alternative. Under this alternative Phillips 66 can continue to operate as it currently does and the residents of San Luis Obispo will maintain the current quality and safety of their lives. Please know that PFJ stands with the greater community to take whatever actions are necessary to keep this Phillips 66 Rail-Spur Project from harming our communities.

PFJ-05  
(cont.)

Very truly yours,

People of Faith for Justice



Rev. Richard Kurrasch, Executive Director

Submitted on Behalf of PFJ Board Members:

Rev. Luanne Griguoli, Retired, Presbyterian, PFJ Co-President  
Rev. Jim Nielsen, Retired, Presbyterian, PFJ Co-President  
Rev. Caroline Hall, Pastor, St. Benedict's Episcopal Church  
Rabbi Janice Mehring, Congregation Ohr Tzafon, Atascadero  
Rev. Mike Eggleston, Retired, United Methodist  
Maggie Fertschneider, Member of United Methodist, Atascadero  
Gina Whitaker, Member of Unitarian Universalist Fellowship, SLO  
Henriette Groot, Ph.D., Member of Central Coast Friends Meeting  
Sharon Rippner, Ph.D., Attends White Heron Sangha