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Date: 11/21/2014 03:51 PM
Subject: Phillips REIR - Rail Spur Comment #8

REIR section 9.0 identifies three options for satisfying the county's requirement for vertical access to the coast. Phillips 66 has agreed to immediately provide public access to the beach if any projects are complete (they are currently on a ten-year window to complete the access as part of the Throughput project approval in 2013). The three options are:

1. Motor vehicle access – Bridge over RR to allow vehicular access to the State Offroad Vehicle Park (dune buggy and camper access).
2. Bicycly and foot traffic access – pedestrian bridge over RR
3. Docent-led access to the dunes.

Option 1 will allow State Parks to close the Arroyo Grande Creek to vehicle crossings, thus forcing all camper and dune buggy traffic to use a new entrance at Phillips 66 (and use Willow Rd from Hwy-101). The construction would include a paved road past the refinery, up to a 25,000 square foot parking lot. This would give vehicles capable of driving on the dunes access to the beach. New issues related to option 1 – HEB-01

Air quality impact – the REIR claims there is no dust impact because vehicle trips shift from Oceano and Pismo beach entrances, to the refinery entrance. However, the impact is major for the Nipomo Mesa Emissions impact – again the REIR claims no impact from emissions because they are only shifted from another location, to the Nipomo Mesa.

Condor Study estimated that a peak of 3,579 vehicles per day would use the new refinery access point

Significant impacts along the Willow route to Hwy 101 exist. As previously pointed out, Willow is more similar to a Collector roadway than an Arterial roadway (9,400 versus 16,000 ADT).

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Subject: Phillips REIR - Rail Spur Comment #7

REIR section 4.12-25 presumes that peak train travel associated with the Rail Spur would be one round trip per day. However, the Rail Spur will generate a peak of three round trips per day. For example, in UPRR's capabilities:

1. A full unit train arrives at SMR at 8AM, leaves with an empty tankers at 9AM.
2. A second full unit train arrives during the day and delivers a full unit train on the overflow tracks at SMR (because the 8AM load is still being processed);
3. A third full unit train arrives at 8PM, and leaves with empty tankers (the ones that arrived at 8AM) at 9PM.

HEB-02

Therefore, since the REIR is required to evaluate the impact of peak train travel associated with the Rail Spur, the REIR must consider the possibility of six trains passing any point within a one-day period.

REIR section 4.12 -26 identifies delays on at-grade crossings. Trains in SLO county will be traveling between 10 and 30 MPH. Crossing delays will range between 2.2 and 6.5 minutes per train. The REIR claims this as a class-III impact. However, with peak activity of six trains crossing roads per day, the activity represents a Class-II impact, mitigated with separated crossings being necessary throughout the system to mitigate.

HEB-03

REIR section 4.12 – pages 26 through 45, make various references to the impact of one-round trip train peak. However, as pointed out in 4.12 page 25 comments, the Rail Spur will generate a peak of three round-trip trains per day.

HEB-04

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Subject: Phillips REIR - Rail Spur Comment #6

The REIR, section 4.12-2 identifies Willow Road as an Arterial Roadway (16,000 daily vehicle capacity DVC). However, we believe Willow Road should be considered a Collector Road (9,400 DVC) because:

- Roadway design is consistent with Pomeroy Rd (Collector Rd).
- Four-way stop sign at intersection of Pomeroy and Willow consistent with two collector roads.
- Short roadway line-of sight (due to rolling hills) on Willow, in the immediate vicinity of large residential entrances.
- Recent history of user complaints regarding speed limit on Willow set too high

HEB-05

REIR section 4.12-23 evaluates construction traffic on Willow Road according to Arterial Roadway conditions. However, as pointed out previously, Willow Road has Collector Roadway conditions (9,400 versus 16,000 DVC). This criteria creates a Class-II impact to roadways during construction.

HEB-06

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Subject: Phillips REIR - Rail Spur Comment #5

REIR, section 4.12-10 points out that much of the coastal rail route has hand operated switches that require train crews to operate tracks before and after trains enter sidings. This antiquated systemshould be considered Class II, and should be corrected on the entire coastal route before creating a new destination for oil-by-rail. HEB-07

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Subject: Phillips REIR - Rail Spur Comment #4

REIR, section 4.12-10 identifies passenger train on-time-performance according to actual departure times versus actual arrival times.
Performance metrics should also include the impact of passenger trains departing later than scheduled due to rail congestion, including freight train congestion. HEB-08

The REIR claims passenger train on-time performance is 80% between April 2011 and March 2014. By including delays to scheduled departures, OTP would drop well below 80% if delays to departures are included in the metric. HEB-09

REIR, section 4.12-10 claims freight trains contribute to only 2% of passenger train delays along the coastal route. That figure will be much higher if departure delays are included in the metric. HEB-10

REIR section 4.12-11 points out that the Federal Railroad Administration has established a target goal of 80% performance for the coastal passenger trains. Therefore, performance is already below acceptable limits, and additional freight train traffic will further reduce performance. This creates a class-2 impact, with the improvements to the coastal rail system required to mitigate. HEB-11

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Subject: Phillips REIR - Rail Spur Comment #1

The REIR “alternatives” section does not consider another obvious alternative. Price Canyou Oil Fields have proposed expanding production capacity. Phillips 66 proposes running a new 10” underground pipeline to connect Price Canyon oil fields to SMR (an active EIR). The added capacity of Price Canyon crude furthers SMR's ability to optain adequate supplies to satisfy operation of the SMR.

HEB-12

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