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Subject: Phillips 66 - Oil Train Spur Extension - Comments

(See attached file: Oil Train Spur Extension - Phillips66 -
comments.docx)

Alan C. Miller
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November 24th, 2014

Murry Wilson
SLO County Department of Planning and Building
976 Osos Street #200
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Subject: Oil Train Spur Extension – Phillips66 - Comments

Dear Mr. Wilson,

As feasible mitigation to the hazard of transporting crude by rail on rail lines in proximity to Northern California population centers, a viable and preferred alternative is a northern California rail-to-pipeline oil transload facility combined with an intra-California oil transport pipeline network.

The transload facility could be built north of Oroville (the first major population center the oil trains would otherwise pass through) and would allow oil transloaded at this facility to continue by pipeline to refineries in Benicia, Richmond and Pittsburg, and then south along pipeline rights-of-way to refineries in Bakersfield, then follow an oil pipeline right-of-way from the south end of the San Joaquin Valley over the Coast Range to the Phillips 66 refinery in Santa Maria.

This alternative avoids exposing all cities, towns and densely populated areas in California to near-daily unit oil trains. The shipment of oil in unit trains on routes as currently proposed puts hundreds-of-thousands of people in "up-rail" population centers within the oil train blast zone. These populated areas include parts of Oroville, Marysville, Roseville, Sacramento, West Sacramento, Davis, Dixon, Fairfield and Suisun, Martinez, Hercules, Richmond, Berkeley, Emeryville, Oakland, San Leandro, Hayward, Union City, Fremont, Alviso, Santa Clara, San Jose, Morgan Hill, Gilroy, Watsonville, Salinas, Soledad, King City, Paso Robles, Atascadero, Santa Margarita, San Luis Obispo, Pismo Beach, Grover Beach, Oceano, Callender and Guadalupe. A pipeline alternative avoids exposing all populated areas of California to a possible oil-train derailment and accompanying incineration.

State regulators and oil companies, in partnership, should consider the advantage of constructing such an intra-state pipeline. Oil trains from sources to the east via Utah, or from sources to the north through Oregon, would travel to a single transload facility which would pipe oil to all proposed recipient refineries without unit oil trains creating a potential blast zone within the above-mentioned population centers of California. Construction of these few hundred miles of new pipeline would achieve the intent of the FRA Hazmat Railroad Routing Rule for northern California, for the first time anywhere, by avoiding California cities altogether.

MIA-01

The flexibility of rail is retained under this plan. A major argument made for shipping oil by rail is the flexibility available for changing the refinery's domestic oil source. By building the intra-California oil pipeline network, the flexibility of rail is retained. Trains may be routed from the north, east or even the south or southwest (from Texas via southern Colorado) to the transload facility. This is no different under this plan than without it. The difference is that no Northern California population centers are threatened with incineration. A rail-to-pipeline alternative fully mitigates the hazard of unit oil trains to human populations in California because all oil trains would terminate north of Oroville at this new transload facility.

Oil from the rail-pipeline transfer terminal would utilize this intra-California pipeline to reach northern California, Bakersfield area, and Santa Maria refineries. The intra-California oil pipeline would follow, roughly, old railroad rights-of-way and other linear routes around northern California population centers east of Oroville, west of Marysville, west of Sacramento, east of Davis and Dixon, and across the Bay to Pittsburg. The south branch of the pipeline would continue on the west side of the San Joaquin Valley along an existing oil pipeline right-of-way to the Bakersfield area, and west over the Coast Range to Santa Maria along an existing oil pipeline right-of-way. A map of the proposed route is available upon request.

MIA-01

The proposed pipeline/transload facility is a large investment in industrial safety infrastructure that benefits the people of Northern and Central California. This investment will allow relatively safe (compared to all-rail) transport of oil to multiple refineries. The people of the State of California are the recipient of the safety and job benefits, and therefore state bonds could be sold to finance this infrastructure, paid back by a fee on all oil shipments by rail to the Oroville North transload facility.

Jobs in Santa Maria are important; however, asking Northern and Central California residents within a quarter-mile or so of rail lines to support Santa Maria jobs by gambling with personal incineration and our towns' incineration is not acceptable. The alternative transport method presented here will allow the refineries to receive oil from multiple sources while keeping all California urban areas safe.

Submitted in Safety and Sincerity,

Alan C. Miller
Davis, CA