

To: Murray Wilson, County Environmental Coordinator
San Luis Obispo County Department of Planning and Building

RE: Phillips 66 Company Santa Maria Refinery Rail Spur Extension Project Draft EIR
Coastal Development Permit ED 12-201 (DRC2012-00095)

Executive Summary

pES12- F: Reduce Train deliveries: Not allowing the SMR to operate at its permitted throughput capacity due to fewer deliveries per week would also reduce all the other impacts, especially the Class I air impacts. With air pollution on the Mesa exceeding state standards 27% of days in 2013, and the area being in non-compliance for federal standards, this is a major consideration.

DUP-1

In the same section, the report indicates that using the Reduce Train Deliveries alternative would result in slight reductions, when in fact it would reduce by 40%. That isn't slight!

Impact Summary

Class I Impacts

IST-1: AQ-2a: The current trend is to offset onsite emissions in one location with emissions at another location. Allowing this does no one on the Nipomo Mesa any relief.

DUP-2

AQ-3: This is the same result. Finding somewhere else to reduce emissions may be the latest gimmick but does nothing to reduce emissions for those residents of the Nipomo Mesa living in close proximity to the SMP.

IST-2: BIO-7: It is hoped that once these Plans are written, they will be available for public comment before approval.

DUP-3

Class II Impacts

IST-5:AV.3 One of the benefits to living on the North Mesa is the nighttime visual quality we experience. While the entire, refinery can be seen from parts of our area, in our specific location there is no light impact and we have amazing visibility at night. This is enhanced by the limited number of street lights in our area. It is absolutely essential that no new light be emitted from the SMP if the rail extension plan is implemented, either from fixed light sources or mobile equipment like trucks and trains. As above, I would hope that once the Lighting Plan is submitted, it will be available for public comment before approval.

DUP-4

IST-9: AQ-1a(e): Subcontractors should be required to have the proper equipment to mitigate the pollutants. Allowing subcontractors to reduce emissions elsewhere does not make this a Class II mitigation - it becomes an unmitigated impact. Because of the seriousness of the impact, albeit temporary, residents expect full mitigation, not shortcuts.

DUP-5

IST-11: AQ1e: At the risk of being repetitious, how does reducing impacts in a different location serves as mitigation for the affected area. I know it is allowed, but its use should be minimized and only under the most pressing situations. Otherwise, this is not really a Class II mitigation for the affected area. It serves as a “Get Out of Jail” card.

DUP-6

AQ1f(b): If I recall from the various studies done on the PM10 levels on the Mesa, the wind does not have to be blowing very hard to generate significant particulate dust. Fifteen miles per hour may seem like a low number, but the PM10 studies should be reviewed, if they haven’t been, to see at what velocity, PM10 starts to blow. We certainly do not need another source of airborne dust.

DUP-7

IST-12: AQ1f(l): AQ1f(b) above requires that no airborne dust leave the sight. This paragraph requires water every three hours to achieve a 61% reduction in particle emissions. Does that mean that there can be particle emissions on site, but they are not allowed to leave the sight?

DUP-8

IST 13-14: AQ1i: I am sure the County is aware of the multi-year disaster known as the Guadalupe Oil Spill, back in the 1990’s. It is quite likely that there is hydrocarbon contaminated soil near the SMP. What are the repercussions to Philips 66 if they do not report within 48 hours, as required?

DUP-9

AQ-6: Depending on the direction of the wind, odors currently emanate from the SMP and impact surrounding neighborhoods such that, under certain circumstances, sensitive people need to stay indoors. This includes areas to the north of the refinery. It is hoped the Refinery Odor Control Plan will not allow for further odors in neighboring residential communities.

DUP-10

BIO-1: While it is proper to determine the presence/absence of Nipomo Mesa lupine and other species prior to implementation of the project, we are not experiencing a normal rainfall season. Is it the intention of the County to withhold this permit until we experience a normal rainfall season?

DUP-11

IST-29: GR-1h: After inspecting facilities for damage, if any damage is noted, operations should cease until damage is repaired and inspected in accordance with County and State requirements.

DUP-12

IST-31: Nn-2a: Noise levels on the North Nipomo Mesa adjacent to the Oceano Dunes State Vehicle Recreation Area have increased substantially in the last three years. State Parks is not monitoring noise levels off site and is not enforcing riding limitations after hours. Those of us who live closest to the ODSVRA hear vehicle activity even in early morning hours (ie: 2AM). Does giving the SMP 100 minutes between 10PM and 7AM for locomotives east of the unloading rack area (closest to residential areas) mean we have to listen to noise from the area for ninety+ minutes each night. It is hoped that this noise would be below County noise ordinance thresholds.

DUP-13

IST-34: T1-a(a): It is hoped that delivery of construction material would be in the daytime, avoiding peak traffic hours and not at night.

DUP-14

IST-37: HM-1: To assume that any fires or explosion would not extend beyond the boundaries of the SMP is just that, an assumption. There are six Amtrak passenger train which run adjacent to the SMP that would be impacted if a fire would occur while the train is passing. There are numerous residential areas that could be impacted if the explosion and resulting fire were severe enough. This needs to be evaluated further.

DUP-15

HM-2: When was the QRA done? Undoubtedly before the three major incidents involving crude oil in Canada and the US were publicized. In the 1/24/14 SLO Tribune, an article on page A6 says that US and Canadian accident investigators are urging their governments to impose new safety rules for the transport of crude oil. It included "better route planning for trains carrying hazardous materials to avoid populated and other sensitive areas". To assume the level of risk within SLO County is acceptable is not in keeping with current rail accident trends. The DEIR assumes most trains would come from the north (Project Description, p2-22, 2.5.1 pp3). As more and more crude oil is transported from distant locales for processing, it is likely that the frequency of derailments and other rail accidents will increase. This mitigation response is irresponsible!

DUP-16

IST-39: PH-2: Although all transport of hazardous materials from the refinery would use Highway 1 and Willow Road, those roads are directly adjacent to Trilogy and Black Lake, and adjacent residential areas. To say the possibility of displacing people is less than significant presumes that there will be no accidents while the transport through these areas is taking place. If an accident should occur, people will be displaced and this needs to be considered.

DUP-17

IST-40: PS-4: While it is unlikely that police services would be needed on a frequent basis, if a large event were to occur, police services would be needed, beyond the SMP security service and beyond local police capacity. With the amount of detail that is going into this draft EIR, why is this glossed over?

DUP-18

IST-41: TR-3: As a frequent rider of Amtrak Surfliner, which arrives in Grover Beach about 8PM, I have reservations about whether the crude oil train would impact the on-time arrival of the Amtrak train. There have been times when the Amtrak train was held up for an hour while a slow-moving freight train made its way through the Nipomo Mesa because the siding at this juncture was too short for the freight train. It is understood that the crude oil train would arrive at night, but it needs to be well after the time the Amtrak train travels through this area.

DUP-19

Introduction

p1-4: 1.1: Word has it that Phillips 66 has changed its mind since the Draft EIR was prepared and no longer wants to import Bakken oil, the source of the major train accidents in the last few months. But since this declaration is in the Draft EIR, it has to be taken at face value. Bakken oil is highly flammable and the idea of bringing this oil by

DUP-20

train through highly populated areas (think downtown San Luis Obispo, not to mention the residential areas around the SMP) is unimaginable. Do we really want this daily transport of almost two million gallons of volatile crude oil, a potential source of catastrophe, coming into our county?

DUP-20

No crude oil or refined product would be transported out of the refinery by rail, but, as we have seen above, it may be transported by truck adjacent to dense residential areas.

p1-7, 1.3: The movement of trains through the county may be preempted by federal law. However, activities occurring on the SMP are within county jurisdiction. With the new information coming to light on the hazards of Baaken oil, it is incumbent on county agencies to protect county residents by placing strict regulations on, or completely denying the right to import Baaken oil.

DUP-21

1.4: Comments on the Vertical Coastal Access required by the County Board of Supervisors in March, 2013, will be made later in this document.

Project Description

2-1: 2.0: Manifest trains appear to be a big red flag! How many rail cars of crude oil will be delivered with each manifest train? It is not clear how manifest trains make deliveries to the site. Do they pull off the main line completely? **Are the crude oil rail cars delivered by manifest trains in addition to the unit trains?** How much time is anticipated in separating the cars from the manifest train so it can continue on its way? How does this impact Amtrak trains? The DEIR appears to be skirting this issue.

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2-10: Figure 2-5: It looks like seven tracks would be constructed, not five, as new coke tracks are installed to replace old coke tracks. In addition, the Existing Refinery Spur Track and the Bad Order Track are being replaced.

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2-14: 2.3.4: In describing the unloading system, it occurs that this can be a very hazardous situation. Does such a hazardous situation occur as the plant stands now. If not, how much more hazardous is the new system with the new rail spur.

DUP-24

2-16: 2.3.6: Are there existing above-ground pipelines at the SMP which are moving unrefined or partially refined oil products within the facility? If not, how much more of a hazard is potentially possible in the new above-ground pipeline?

DUP-25

2-17: 2.3.9: If the security fencing does not extend east around the perimeter of the secondary emergency access road, at what point does the fencing get in the way of emergency access and how is breaching the fence by emergency personnel accomplished?

DUP-26

2.3.10: Is it sufficient to have the spill containment system only be able to handle the contents of two rail cars and associated fire suppression materials? Wouldn't it be

DUP-27

more likely that if one rail car were affected, adjacent ones might be also before any fire suppression system would start working?

DUP-27

2-19: 2.4.1: The construction schedule depends on many factors, including whether the area gets a normal rainfall year to determine the location of the Nipomo Mesa lupine, which does not look promising at this point,

DUP-28

2-23:2.5.1(2): If this is being read properly, it appears that the two locomotives being used to move rail cars around before and after unloading will be active for the entire time the rail cars are being unloaded. Including idling time, this could be up to 11.5 hours. On certain clear nights, sound travels long distances. We hear the off-highway vehicles routinely. How is it that we won't hear the two working locomotives all night, as per the schedule in Table 2.5?

DUP-29

2-30:last pp.: The amount of crude oil proposed being received by rail is approximately 2,000,000 gallons a day or 45,000 barrels. That is 10,000,000 gallons (225,000 bbls) per week and 500,000,000 (11,250,000 bbls) per year. Add the existing 30,000 barrels per day and that amounts to 75,000 barrels per day, which exceeds to current SLO County Department of Planning and Building limit; and 18,750,000 barrels per year, which exceeds the SLO County APCD limit (p. 2-28). Considering the historical throughput chart on page 2-28, there will certainly be a significant increase in throughput from prior years, assuming that the maximum APCD limits are used: 23% based on 2012 production, 13% based on 2005 which was the highest production year shown. Assuming also that neither agency increases the throughput allowances, it is just not true to say that there is no increase in throughput!

DUP-30

Aesthetics and Visual Resources

General comment: One of the most appealing aspects of living on the Nipomo Mesa is the visibility of the night sky. In the Cypress Ridge development, there are only a few street lights to illuminate busy intersections. However, from the higher, more northerly locations in CR, the SMR is a significant source of night light. From the more westerly area, tree cover between homes and the SMR eliminates most of the light pollution from that source. It is incumbent on the applicant not to increase by any measure the amount of light emanating from the Rail Spur Project.

DUP-31

The fact that there was no lighting plan included in the project description is troublesome. The applicant proposes thirty-foot high light poles around the Rail Spur Project itself and fifteen-foot poles on the perimeter. Unless the unloading facilities are thirty feet high, this is in non-compliance with SLO County requirements that light poles not be higher than the structure they are lighting.

DUP-32

Page 4.1-25: pp.4, makes note that the closest residential unit is 0.5 mile away. It is important to note that residences more than a mile away will be impacted by any increased light and one of the most appealing aspects of living on the Mesa would be reduced.

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In addition, lights from locomotives and other sources would significantly visually impact residences at Trilogy unless the proposed mitigation measures are effective.

DUP-33

4.1.-27: 4.1.7: The second paragraph seems to indicate that golf course developments and other residential developments by their nature make the impact from the Rail Spur Project less significant. Many of the developments have minimized lighting to promote the night-sky visibility and rural character of the area.

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It is hoped that, within six months following project completion, residents will be allowed to comment on the effectiveness of the proposed lighting plan.

Population and Housing

Although all transport of hazardous materials from the refinery would use Highway 1 and Willow Road, those roads are directly adjacent to Trilogy and Black Lake, and adjacent residential areas. To say the possibility of displacing people is less than significant presumes that there will be no accidents while the transport through these areas is taking place. If an accident should occur, people will be displaced and this needs to be considered.

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Public Services and Utilities

PS.3: 4.11-18 paragraph 5: It would be important to know how many people were part of the SMP fire brigade and/or hazardous materials response team each year within the past ten years.

DUP-36

4.11-19: This report may have been written prior to the widespread notification of three significant incidents with the highly-volatile Bakken crude. It is hard to imagine, given the information and images provided by the media, that *any* mitigation in this area could bring this item down to a Class II mitigation. A crude oil fire is not just a fire but includes explosions that spread and cause widespread damage.

DUP-37

4.11-20 PS.4: The local Sheriff substation only has two officers on the night shift to patrol all incorporated areas in South County. A disaster similar to the ones described above would completely overwhelm any police services currently provided, especially if it occurred at night when the crude oil is being offloaded. This can not be fully mitigated.

DUP-38

Transportation and Circulation

4.12-14;4.12.1.4: While personal experience agrees with the finding that most Amtrak delays are caused by waiting for other passenger trains, by far the longest delay experienced over fifteen years was waiting for a slow freight train on the Nipomo Mesa.

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4.12-21: TR-2: Again the assumption the the Rail Spur Project would not increase throughput. It would not increase throughput above Planning and Development standards or APCD standards, but, as seen in 2-30 above, it would increase throughput by 13-23% over prior years. So the continued comment that throughput would not increase is incorrect.

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4.12.21: TR.3: No mention is made of the manifest trains that are slotted to bring crude oil to the refinery. Why is that? And, if a manifest train is long enough, it will cause a delay in Amtrak passenger service as noted above (4.-12-14).

DUP-41

One other note: Many times while traveling south from SMP at 7:20 AM, the Amtrak train has had to slow substantially, occasionally through Lompoc Surf, because of a slow freight train in front with no adequate siding able to accommodate the length of the freight train.

Water Resources

Two comments:

The DEIR assumes that stormwater or any other intense water event would immediately percolate into the soil. Anyone who lives with sandy soil knows that, unless the soil already has moisture in it, water runs off the soil for a long period of time. Evidence flash floods in the desert. Thus, the assumption that any excess water would percolate is incorrect. Only after significant wetting will the water immediately percolate into the soil. So this may not be a Class II mitigation.

DUP-42

Once again, two 30,000 gallon storage tanks to be used as secondary containment seems low when one tanker car carries 23,500 to 30,000 gallons each. Projecting spill from only one car may work with grain but the likelihood of only two cars filled with crude oil being involved in a spill is very low.

4.13-14:WR.2 To directly quote the DEIR:

In the unlikely event of an oil spill along the UPRR mainline tracks, there would likely be no oil spill containment or cleanup equipment available, and it would likely take some time for emergency response teams to mobilize adequate spill response equipment. Depending upon the location of the spill this could allow enough time for the spill to impact surface water quality, and then possibly groundwater quality. Therefore, oil spills along the UPRR mainline tracks could be *significant and unavoidable (Class I)*, depending upon the location of the spill.

DUP-43

This impact alone should make this project untenable!

Air Quality and Greenhouse Gases

4.3-36: AQ-1a(e); 4.3-38:AQ-1e; 4.3-39: AQ1f(n)4.3-43: pp 5 & AQ-2a;4.3-46: AQ-3;1.3-53: AQ-1a(c); 4.3-54: AQ-1e; 4.3-57::AQ-2A;4.3-58:AQ-7: Although allowed under state law, using off-site mitigations is unacceptable because they do nothing to protect those residing in areas where impacts are significant. For example, in 4.3-36: AQ1a(e), no contractor should be allowed if construction equipment does not meet SLOAPCD standards.

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4.3-43: AQ2b; 4.3-45 pp. 34.3-57: AQ-2b: This mitigation is contrary to the information that two of the locomotives will be on the entire time the unit train is onsite. Since they will not be moving the entire time, they will be idling a significant amount of time.

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4.3.-43: AQ-2b;4.3-47 AQ.3 Final pp.: There is an underlying assumption in this entire report that if an impact in not able to be mitigated, OH, well! Any time a significant impact can not be mitigated, it should add to the reasons why the project is not feasible. So far, there are four of these.

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Biological Resources

4.4-17: BIO-1: This year is not a normal rainfall season.

DUP-47

General comment: Any fire/explosion within the refinery property would have significant, long-lasting impacts on native plants and animals. You can't go back once this happens.

DUP-48

Geologic Resources

4.6-14:GR-1h; 4.6-18: 4.6.6(GR-1h): Damage to be repaired and reinspected prior to restarting operations.

DUP-49

Hazards and Hazardous Materials

4.7-17: Page 4.7-16 indicates that the maximum spill size calculated was 30,000 gallons, which is the equivalent of one large rail car. And yet, in the recent event in Lac-Megantic, Canada, 63 cars derailed, releasing crude oil, and the rest "failed" due to over-pressurization. This validates a point made earlier in these comments, that assuming 30,000 or 60,000 gallons containment in a major event significantly underestimates the process that would occur in a severe event.

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4.07-57: First pp: The description of the containment tanks differs from the description in Water Resources above.

DUP-51

4.7-61:pp.3: "The level of risk for the Rail Spur Project is the blue lines in Figure 4.7-5. Because maximum risks from proposed transport of crude oil are below the significant risk threshold (dashed green line), impacts would be considered less than significant. "

This analysis was not very clear but it is clear that impacts are more significant than noted. For example, there is a substantial grade as the UPRR line climbs onto the Mesa out of the Arroyo Grande Valley. There has been at least one derailment on this section early in the last century. While the Cuesta Grade presents a much greater risk, this location is not insignificant.

DUP-52

It is really convenient to have studies show that the impacts are less than significant requiring no mitigation but common sense and recent events say otherwise.

4.7.5: Phillips 66 Co.: This entire analysis operates on the assumption that all residences are too far away to be impacted. A significant explosion, either at the SMP or on the tracks leading to the facility, would knock out windows more than .5 mile away and people would have to be evacuated. In December, an oil train derailed and exploded in North Dakota, about a mile from town. Two thousand people were evacuated due to toxic smoke. None of them live .5 mile or less from the derailment.

DUP-53

Noise and Vibration

Although we live in a rural area, we experience noise from different local sources: whistles at the refinery; train horns each time a train passes; noise from the ODSVRA, usually on holidays and busy weekends; some vehicle noise from Highway 1; and shotgun blasts. The volume of noise experienced depends on atmospheric conditions.

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Residents in the Arroyo Grande section of the Nipomo Mesa, near Highway 1, experience noticeable noise levels from the refinery on a daily basis. Why was this area not included in the DEIR? Some of us live right across the highway from the track; others, with a mile.

4.9-25: N2a : It still is not understood how this mitigation can occur if two locomotives will be in operation or idling all night, five days a week. Also, horns are routinely used at the crossing just prior to the SMP. Does this mitigation cover off-site or just on-site?

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4.9-28: pp. 2: Based on all the information available in this report, most trains would be entering the area adjacent to the SMP at night. To assume that their arrival would be spread out during the day is incorrect.

DUP-56

Alternative Analysis

5.1.4.1: In 2012, SMP processed 13,724,000 barrels of crude oil. Give them a 10% increase over that to take throughput to 15,096,000. They are slated to process 10,950,000 barrels this year from current sources (30,000 bbls/dayX5daysX52weeks). If they brought in two train units a week in addition to current sources, they would end up with 15,630,000 (45,000bbls/dayX2daysX52weeks + above), which is more than a 10% increase, to satisfy the economics. That would also lessen the most serious impacts by 60%, assuming two trains a week rather than five.

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To insist on five trains and then to send their current supply elsewhere, in order to meet county requirements, with all the ramifications of sending crude over thousand of miles and all the way through our county, is ludicrous. Sometimes, common sense is better than numbers and analyses. It doesn't seem possible that anyone could conclude that two trains coming through our county with the potential for derailment or other serious hazards would have a "very slight environmental advantage" over five trains.

Vertical Coastal Access Plan

(Why is this called a vertical access when roads and trails are mostly horizontal?)

If the plan is to create a dirt or equivalent road out to the riding area of the ODSVRA, to be used by hikers and bicyclists, and used by fire and police in case of emergency, I have no objections.

DUP-58

But if the ultimate goal is to provide public access for vehicles, this is going to require a separate EIR because there will be substantial impacts to many communities.

I will wait for the separate EIR.

Final Comments

Where to begin? What was then Conoco Phillips applied for and received a 10% throughput increase in 2013. I can't imagine anyone in this county had any idea that this increase was for other than current sources of crude. The company certainly did not advise us of its long-term agenda. Now, because the crude oil supply from current sources is in decline, it wants to endanger citizens of this county on a daily basis so it can keep production up, at prices lower than their current sources.

This has nothing to do with jobs - the current catchword - but has solely to do with corporate profits. I can imagine the executives of Phillips 66 in Houston (and Conoco Phillips before them) knowing for years that the supply was diminishing and that some alternative needed to be found.

From an Associated Press story on January 23: "Warning that a "major loss of life" could result from an accident involving the increasing use of trains to transport large amounts of crude oil, U.S. and Canadian accident investigators urged their governments Thursday to impose new safety rules."...

"The large-scale shipments of crude oil by rail simply didn't exist 10 years ago, and our safety regulations need to catch up with this new reality," NTSB Chairman Deborah Hersman said in a statement. "While this energy boom is good for business, the people and the environment along rail corridors must be protected from harm."

From Buzzflash.com January 24: "About 92,000 of the 106,000 tanker cars currently in service were built before 2011 when stricter regulations mandated new design. The older cars (DOT-111) have an 'inadequate design and are susceptible to leaks and explosions in derailments', according to the National Transportation Safety Board."and "Railroad accidents in 2013 in the United States [this does not count the Canada accident] accounted for 1.15 million gallons of spilled crude, more than all spills in the 40 years since the federal government began collecting data, according to the U.S. Pipeline and Hazardous Materials Safety Administration (PHMSA)."

On July 6, 2013 a 73-car derailment in Canada killed forty-seven people and destroyed thirty buildings. That same month, three tanker cars exploded near Columbus, Ohio, resulting in the evacuation of residents (noted above). In October, 2013, a train hauling oil and gas derailed in Alberta, causing three of the cars to catch on fire. In November, 2013, a niney-car train derailed in Alabama, spilling 750,000 gallons of crude into wetlands. The fire lasted more than a day. In December, 2013 a 106-car train hauling Bakken crude hit a 112-car train carrying grain that had derailed near Cassleton, N.D. Four hundred thousand (400,000) gallons of crude were released and toxic smoke caused the evacuation of residents within five miles. Finally (but not), a train hauling crude oil and propane derailed In New Brunswick, causing 45 homes to be evacuated. (Buzzflash, January 24)

From the same source: "This month, PHMSA issued a safety alert that 'crude oil being transported from the Bakken region may be more flammable than the traditional heavy crude.' Bakken shale could cause evaporative losses of explosive volatiles benzene, toluene, hexane, xylene, and hydrogen sulfide, all of which cause death from burns and respiratory failure."

How can we possibly agree to bring this potential source of catastrophe into our county on a daily basis?

The refinery was built in 1955 to process crude oil from the local area. When that source partially dried up, they processed it from offshore and other southern California areas. Sixty years is a good run for a processing plant. It's time to take it off line find some other use for this industrial location. Maybe this would be a good location for a desalinization plant! It would serve the residents of the Nipomo Mesa better.

Regarding the DEIR itself, p1-10:1.5: If CEQA guidelines require that all significant environmental impacts have been reduced to an acceptable level, that requirement has not been met and cannot be met. There are at least four Class I mitigations that cannot be met (HM.2, PS.3 (both fire and police), WR.3). There are at least ten mitigations that involve off-site mitigation. One is important to think about but ten, if many or all are used, become cumulative impacts that are incapable of being mitigated.

If some rule or agreement exists that we don't know about requiring that this rail spur be built, we don't have to agree to five trains per week. The economics work at just two trains per week.

I have met some of the people who work at Phillips 66 SMP. They are dedicated neighbors who work hard at what they do. They take pride in their community and do extensive volunteer work. But the employees are not the corporation. Phillips 66 does not care about San Luis Obispo County other than how the county can affect their bottom line.

The only people who can avert this disaster are our elected officials and county staff. Please put residents first and, at the very least, prohibit Bakken crude at the SMP. The best interests of county residents would be served by denying this application!

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