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Subject: Fwd: Phillips 66 railspur project - DEIR comments

As described by the DEIR, Phillips 66 is changing the way it receives crude oil from its present operation. By their own admission, if the rail spur were not allowed, local oil sources would be insufficient to economically operate the plant.

Due to this change in operation, all impacts of plant operation should be evaluated for impact and mitigation. Main concerns are as follows:

1. Water Quality: Currently water used for production is minimally treated and discharged into the ocean. Phillips has stated that the treated water is too high in nitrates to be reused for production. A proposed mitigation for this impact would be to treat all production water for reuse in the plant such that current impacts to the ground water basin are minimized. As an alternative, high nitrate water is an excellent source for non-potable irrigation, and should be pumped to adjacent agricultural properties to augment irrigation needs and minimize impact to the ground water basin.

HRS-1

2. Air Quality: Current operations, while having no documented violations of AQMD standards, regularly emit odors which can be detected for 2-3 miles inland of the facility. A proposed mitigation would be monthly monitoring for AQMD violation and odors, and establishing a hotline to the County such that instances can be documented and remedial action thru the Mitigation Monitoring program can be taken.

HRS-2

3. Fire and Safety: Transport of crude oil in the volume being proposed greatly increases the chance of accident compared to the current operation. Danger of explosion, fire, soil and groundwater contamination are all possible regardless of prior safety records or minimal frequency in which they may occur. One accident can cause catastrophic damage which could take years and be extremely costly to remediate. A proposed mitigation for this new hazard would be a comprehensive accident response plan, coupled with either a substantial bond (\$30M) or proof of Insurance to cover an accident.

HRS-3

4. Transportation and Circulation: No additional truck trips should be required for the new operation, however existing truck trips currently access the plant from PCH-Highway 1, a scenic highway. Mitigation measures should include the following:

HRS-4

a. Mitigation monitoring should include requirements to monitor truck traffic annually to insure no increase in volumes.

b. The portion of PCH-highway 1 used for truck access should meet state standards for bike lane width (min 5 feet) to insure safety of bicycle users from truck traffic.