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<p66-railspur-comments@co.slo.ca.us>
Date: 11/24/2014 05:07 PM
Subject: Opposition to the Phillips 66 Rail Terminal Project

Mr. Murry Wilson, SLO County Planning Department -

I am writing to voice my opposition to Phillips 66 proposed project to add rail spur lines to their refining facility on the Nipomo Mesa. I moved to this county in March of this year from Stockton, hoping for a better and quieter quality of life. Like many others, I believe this project will negatively impact that quality for many residents of San Luis Obispo County. FID-01

The revised Environmental Impact Report ("REIR") lists FIVE Class 1 impacts (REIR: sectionsAQ2-6). The south county area already has a significant number of days where pollutant emissions exceed SLOCAPD thresholds, mostly from particulate matter that comes onshore from the Oceano Dunes area. The REIR notes that not only would the operational activities of the spur generate excessive pollutants but the rail route through the county would as well. (AQ2-3). And these pollutants would be toxic (AQ 4-5)! FID-02

The rail line runs near Cal Poly and the hospitals in San Luis Obispo, along the beach and tourist areas, as well as productive farmland, hiking trails and the Monarch Butterfly preserve. The nearby Oso Flaco Nature Preserve sees thousands of migratory birds each year. The endangered snowy plower and least tern nest on the nearby dunes. The negative impact of increased pollutants has been grossly understated by Phillips 66, including that generated by increased Petcoke production. FID-03

Each of the proposed trains would be 80 cars long and together with the engines and buffer cars, would be over 1 1/2 miles long. As they go by on a daily basis, the pollution from the cars and the locomotives that pull them would be spewed along the route. The trains would be virtual pipelines, snaking through residential and commercial areas and causing traffic snarls at railroad crossings as there are few over or underpasses. There would also be a significant increase in noise, both along the route with the additional trains and at the operational yard, as well as an increase in noxious odors, both from the trains themselves and from the refinery.
Noise would not be limited to weekday, daylight hours, but occur round the clock. FID-04

The REIR is vague regarding the source of the crude they intend to refine here. The majority of North Dakota's Bakken shale is produced via fracking, which process involves the addition of toxic chemicals. 90% of that crude is transported out of state by rail and spills from rail road cars has increased dramatically; in 2013 alone, the amount in the US was
1.15 million gallons. The Pipeline Hazardous Materials and Safety Administration (PHMSA) is currently investigating whether Bakken crude is more explosive because it was obtained by fracturing, thus raising additional concerns about derailments, spills, and leakage. Phillips owns a number of DOT 111 tank cars, FID-05

which have only a 7/16" thick shell and can't vent high pressure vapors quickly, thus increasing the risk of thermal explosions. FID-05 cont

Phillips has operated little justification for the proposed expansion other than profit. Their 2012 annual report speaks to increasing their stake in the global market. That implies exportation rather than domestic use. FID-06

While the building of the spur may provide jobs, the operation is estimated to increase the refinery's payroll by only 12 employees. The San Luis Obispo County Planning Commission, on behalf of all residents and visitors, should deny Phillip 66's proposed project. FID-07

Thank you for your time and the opportunity to voice my concerns.

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FID-01	This comment does not identify a specific environmental analysis or CEQA issue relative to the EIR and compliance with CEQA. The commenter's concerns about economics and project objectives are included in the FEIR for the decision-makers' consideration as part of the County's deliberations on the proposed project.
FID-02	The RDEIR addresses the potential impacts and recommends mitigation measures for the proposed Project consistent with the requirements of CEQA. Section 4.0 presents the environmental analysis for the CEQA mandated issue areas; air quality and related health impacts are discussed in Section 4.3 (Air Quality and Greenhouse Gases).
FID-03	The increase air pollutants that would be generated by the trains moving along the mainline have been estimated based upon USEPA and SLOCAPCD methodologies and emission factors. As discussed in Section 4.3, Air Quality, the expected percentage of vacuum resid would remain about the same as the current operations. Therefore, coke production would not be expected to increase over current operations with the implementation of the Rail Spur Project changes in crude.
FID-04	Noise levels along the mainline and at the SMR would increase with the additional trains. Noise levels along the mainline are addressed in Section 4.9 (Noise and Vibration) under impact N.3. Noise levels at the SMR are discussed in Section 4.9 under impacts N.1 for construction and N.2 for operations. Based on in-field monitoring and modeling, noise impacts would be less than significant with mitigation (Class II). Air pollution impacts are addressed in Section 4.3 (Air Quality and Greenhouse Gases) and address impacts along the mainline as well as at the SMR. Impacts would be significant depending on the extent of mitigation measures that are applied. Criteria pollutants, toxic pollutants and odors are addressed.
FID-05	As noted in the RDEIR Project Description in Section 2.0, no Bakken crude oil will be delivered to the refinery vial rail. In order to clarify what type of crude oil can be delivered to the refinery as part of the proposed project, additional mitigation has been added to limit crude oil deliveries via rail to those crude types and petroleum products with an API Gravity of 30° or less. This will effectively prevent the refinery from receiving crude oil derived from fracking operations via rail transport.
FID-06	The comment does not identify a specific environmental analysis or CEQA issue relative to the EIR and compliance with CEQA. The commenter's statement about Phillips 66's justification for the project is included in the FEIR for the decision-makers' consideration as part of the County's deliberations on the proposed project.
FID-07	The comment does not identify a specific environmental analysis or CEQA issue relative to the EIR and compliance with CEQA. The commenter's statement about jobs from the project is included in the FEIR for the decision-makers' consideration as part of the County's deliberations on the proposed project.