From: Ray Garrett <dunes.13@hotmail.com>
To: p66-railspur-comments@co.slo.ca.us
Date: 11/21/2014 08:51 PM
Subject: Fwd: p-66 rail spur

Begin forwarded message:

> From: Ray Garrett <dunes.13@hotmail.com>
> Subject: Re: p-66 rail spur
> Date: November 21, 2014 at 7:55:23 PM PST
> To: p66-railspur-comments@co.slo.ca.us
> Cc: Planning CommissionerPlanning CommissionerPlanning CommissionerPlanning CoordinatorPlanning AssistantSupervisorSupervisorSupervisorSupervisorSupervisorgeneral address <- jim@jimirving.com - ktopping@calpoly.edu - frenchbicycles@gmail.com - elcarroll@co.slo.ca.us - rhedges@co.slo.ca.us - cray@co.slo.ca.us - bgibson@co.slo.ca.us - ahill@co.slo.ca.us - darnold@co.slo.ca.us - fmecham@co.slo.ca.us - boardofsups@co.slo.ca.us - lreynolds151@gmail.com>

On Nov 21, 2014, at 5:17 PM, Ray Garrett <dunes.13@hotmail.com> wrote:

Mr. Murry Wilson, SLO County Planning Department,

As a long time resident of San Luis Obispo County and a resident of Nipomo, I have serious concerns regarding the proposed rail spur project:

1) In 2006 we were able to sell our home in AG and moved to rural Nipomo. One of the primary reasons was the beautiful night sky. The stars move across the sky and set in the west and the planets " go rouge" and often appear in our western night sky. Light pollution is a serious issue that may not have been given enough attention. The REIR fails to address the visual impacts for amateur astronomers. I live directly across the HWY 1 from the plant and believe this issue has not been mitigated sufficiently. Thirty foot light poles along the perimeter will destroy the night sky. GAR-01

2) I worked at CMC for 30 years before retiring and one of my tricks to getting to work on time was skipping the Morro Bay turn off and taking California, until one morning I got stuck at California and Foothill waiting for a train. I have seen the scene when the students can't get to class. They may take risks or not even be aware (head phone death) a train is coming. Even a mile long train! Consider all the other crossings throughout the county. The risk would be to the majority of the SLO County citizens not to residents near the plant where the trains are governed. When I loaned my son in Sacramento a car, I took the train home and saw first hand how close homes are in Paso and A-town are to the tracks. That many trains would really "rock their world." The Board has the ability to control only this project not the "cargo" and are the risks worth it when most of the county's citizens will have negative impacts? By the way ever train leaving the plant going south will sound it's horn 3 times before it gets to Guadalupe. GAR-02

3) The other obvious concern is air quality. Anybody who has read The Tribune has seen the gross pictures of all the black waste on the ground! Would the Board really subject the residents of Nipomo to more air quality issues? There is a serious air quality issue and the REIR uses the wrong standard to measure it. GAR-03

Ray Garrett
dunes.13@hotmail.com

GAR-01	The RDEIR acknowledges visibility of new night lights from the surrounding areas and identifies substantial mitigation measures to minimize any potentially adverse effects. At the unloading facility all lights would be mounted under the proposed canopy. Forty of these canopy lights would be placed 60-feet apart, and 30 of them would be 20-feet apart. Lighting for the rail spur would only be for perimeter fencing security purposes and would be placed on 15-foot tall poles, 500 feet apart. The project proposes to the construct the unloading facility and rail spur tracks adjacent to the southern slopes of a natural landform ridge. This adjacent landform rises to elevations ranging from approximately 120 to 145 feet above sea level. The proposed rail spur tracks are proposed at an elevation of approximately 94 feet above sea level, which would be as much as 55 feet lower than the landform to the north. As a result, views of the unloading facility and railroad spur from the north and the northeast would be substantially blocked. In addition, the eastern segment of the rail spur tracks, closest to Highway 1, are proposed to be constructed in an excavated area maintaining the approximately 94-foot elevation while the adjacent ground rises up eastward, resulting in the easternmost end of the tracks being approximately 20 feet below the surrounding natural terrain. This elevation difference, along with the required 10 to 20-foot tall mitigation berm, would combine for an approximately 30 to 40-foot tall earthen visual screen around the eastern end of the railroad spur. This berm height in combination with the natural ridge to the north will help reduce visibility of night lighting for viewpoints from the east. The lighting associated with the unloading facility would be viewed at a distance of approximately 1.5 miles or more from viewpoints east of Highway 1, and would be seen in the context of the Santa Maria Refinery immediately to the north. In addition the unloading facility proposes a covered canopy over the majority of the area, which would decrease light-trespass. Similar to the lack of visibility of the existing Santa Maria Refinery's illuminated ground-plane, intervening topography would block views of the illuminated ground-plane of the unloading facility as seen from Highway 1 and the residential areas to the east. Although the unloading facility lights would introduce light into a new area, with applied mitigation measures they would not appear out of place given the relatively close proximity to the existing refinery and coke processing facility, which emits high levels of industrial lighting throughout the night, every night of the year. In addition to the applicant-proposed lighting features such as downward-directed lights with fully shielded lenses, the RDEIR requires substantial mitigation measures that will minimize lighting impacts. Mitigation measures include that the lighting plan be based on a photometric study prepared by a qualified engineer who is an active member of the Illuminating Engineering Society of North America (IESNA), using guidance and best practices endorsed by the International Dark Sky Association.

	Mitigation measures preclude illumination of adjacent slopes, prohibit placement of perimeter lights (which as previously described would be 15-feet tall) east of the screening berm (which as previously described would be 10 to 20- feet tall), and require the use of motion detectors rather than being continuously on. Importantly, following project completion the RDEIR requires the preparation of a Lighting Evaluation Report for review and approval by the County Department of Planning and Building prepared by a qualified lighting engineer not involved in the design of the original lighting plan. The Lighting Evaluation Report will conduct a comprehensive evaluation of in-place lighting, under all expected circumstances, and will require correction of any unexpected or residual lighting impacts based on direct observation of the completed project. The air quality mitigation that would limit rail car unloading from between 7 A.M. and 7 P.M. would also serve to reduce the nighttime lighting impacts to less than significant.
GAR-02	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 the potential hazards, traffic and noise impacts of the project are included in the FEIR for the decision-makers' consideration as part of the County's deliberations on the proposed project.
GAR-03	The use of SLOCAPCD thresholds is supported by the SLOCAPCD in their review of the EIRs for this project. As determined by APCD studies, violations of area PM levels are due to the sand particulates from the recreation area and not from SMR operations.