From: Caroline Hall <accesspnt@aol.com>
To: p66-railspur-comments@co.slo.ca.us
Date: 11/25/2014 11:04 AM
Subject: EIR Comments

Dear Mr Murry:

I am very concerned about the proposed Philips 66 spur line for many reasons:

1. There are already significant concerns about the air quality on the Nipomo Mesa. This project would have an additional severe impact, increasing asthma and other respiratory problems among local residents. HAO-01

2. Nipomo Mesa is intended to be a residential area. The proposed Rail Terminal would lead to visual, light and noise pollution and would remove the buffer zone between residents and the refinery. HAO-02

3. County emergency services would have to be prepared to respond to a major catastrophe as mile-long trains full of oil would pass through the county daily. This would require significant funding to achieve and maintain the necessary level of readiness. HAO-03

For all these reasons, I believe that the proposed project will have a detrimental effect in public health and also on our environment and I urge you to turn down thisplannign application. HAO-04

Thank you,

Rev. Dr. Caroline Hall
Rector, St Benedict's, Los Osos

HAO-01	A study performed by the SLOCAPCD, the South County Phase 2 Particulate Study, evaluated whether impacts from off-road vehicle activities at the Oceano Dunes State Vehicle Recreational Area (ODSVRA), the Phillips Refinery coke piles, and adjacent agricultural fields were contributing to the particulate problems on the Nipomo Mesa (SLOC APCD 2010). The Phase 2 portion of the study concluded that off-road vehicle activity in the ODSVRA is a major contributing factor to the PM concentrations observed on the Nipomo Mesa and that neither the petroleum coke piles at the Phillips facility nor agricultural fields or activities in and around the area are a significant source of ambient PM on the Nipomo Mesa. The composition of the particulates is predominately natural crustal particles. The emissions of particulate from natural crustal particles is not an issue for the project. Air emissions are determined to be significant and unavoidable, but not of the items which have been causing issues on the Mesa.
HAO-02	The Nipomo Mesa supports a variety of land use and zoning designations and a wide array of existing land uses. Potential impacts associated with land use incompatibilities are discussed in Section 4.8 of the RDEIR. As explained in that section, an incompatibility would not necessarily result in a significant land use impact, particularly if the impact is based on the same environmental effects identified in other sections of the RDEIR (i.e., Aesthetics and Visual Resources, Hazards and Hazardous Substances, Noise). To result in a significant effect on land use, the incompatibility would need to result in some additional adverse effect, such as health risks, public safety issues, or the inability to sleep, relax, or enjoy the full use of one's property. Using this approach, a significant and unavoidable land use impact was identified based on the increased health risk that would result from increased diesel particulate matter emissions from the Project. Other potential incompatibilities, such as increased air emissions, noise, odor, and hazards, were also considered. The proposed expansion into the buffer area separating the SMR and adjacent residential areas is specifically discussed in Section 4.8 (Land Use and Recreation). Applicable zoning and land use standards associated with the Project Site and surrounding area, and the Rail Spur Project's potential consistency with applicable standards and policies are addressed in Appendix G of the RDEIR. While the RDEIR discusses potential inconsistencies with applicable planning documents, the decision of whether a proposed project is consistent with a particular plan or policy must ultimately be made by the local decision-making body. The comment has been included in the FEIR for the decision-makers' consideration as part of the County's deliberations on the proposed project.
HAO-03	The RDEIR contains mitigation measures PS-3a through PS-3i (see Section 4.11, Public Services and Utilities) to ensure that the SMR Fire Brigade and the Cal Fire resource are sufficient before the project proceeds. These include; 1) an updated Fire Protection Plan for the Rail Spur Project that meets all the

	applicable requirements of API, NFPA, UFC, and Cal Fire/County Fire; 2) an updated Emergency Response Plan to include the rail unloading facilities and operations; 3) an updated Spill Prevention Control and Countermeasure Plan to include the rail unloading facilities and operations; 4) requirements that the SMR fire brigade meets all the requirements outlined in Occupational Safety and Health Administration 29 CFR 1910.156, and NFPA 600 & 1081; 5) updated fire brigade staffing/training requirements and Cal Fire funding requirements; 6) funding of a qualified Cal Fire inspector to conduct the annual fire inspections at the SMR; 7) funding of training for Cal Fire personnel, including field training, as per the Security and Emergency Response Training Center Railroad Incident Coordination and Safety (RICS) meeting Department of Homeland security, NIIMS, OSHA 29 CFR 1910.120 compliance. These extensive requirements would reduce the impacts of the rail spur project on fire resources at the SMR to less than significant with mitigation (Class II). In addition, for transportation of crude oil along the mainline tracks, mitigation measures PS-4a though PS-4c) (see Section 4.11, Public Service and Utilities) include 1) Only rail cars designed to Option 1: PHMSA and FRA Designed Tank Car shall be allowed; 2) requires annual funding for first response agencies along the mainline rail routes; 3) require annual emergency responses scenario/field based training; and 4) notification requirements. Impacts to fire protection and emergency response would remain significant and unavoidable (Class I) along the mainline routes.
HAO-04	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 health and the environment are included in the FEIR for the decision-makers' consideration as part of the County's deliberations on the proposed project.