From: Jean Jackman <jeanjackman@gmail.com>
To: P66-railspur-comments@co.slo.ca.us
Date: 11/24/2014 05:05 PM
Subject: P66-railspur-comments

Murry Wilson
SLO County Dept. of Planning and Building
976, Osos Street, Room 200
San Luis Obispo, 93408

P66-railspur-comments@co.slo.ca.us

Dear Mr. Murry Wilson,

Thank you for an opportunity to comment to the public record on the Phillips 66 Railspur Project.

I live in Davis, California and the proposed 80-car crude oil train going to the Santa Maria refinery 5 days a week will travel through my city.
That it will travel through my city is deep enough concern. It will go right through our downtown area. We are all aware of the Quebec disaster that could happen here. Davis has a a vibrant downtown and because it is a university town, many people are downtown everyday. The tracks are close to historic buildings that could never be replaced. We have a 15 mile-an-hour turn on the tracks that seems an accident waiting to happen for a long train coming through. JAJ-01

Our air is already sub-par since we live in the Central Valley. In Yolo County, according to the American Lung State of the Air Report, we already have the following people at risk:

Total Population:	204,118	Risks to the population
Pediatric Asthma:	3,943	Risks to people with Asthma
Adult Asthma:	13,868	Risks to people with Asthma
COPD:	6,843	Risks to people with COPD
Cardiovascular Disease:	9,427	Risks to people with Cardiovascular Disease
Diabetes:	14,135	Risks to people with Diabetes
Children Under 18:	44,953	Risks to children and teens
Adults 65 & Over:	21,647	Risks to older adults
Poverty Estimate:	33,838	Risks to people with low incomes

JAJ-02

Gradually, our air has been getting better due to new regulations. We do not need further risks which would be the result of this project.

I taught for 14 years in Elmira, Vacaville at a school that was then part of the Vacaville Public School system. At one point, we had more than 1000 students. The trains would go by right across the road from the school which is now a private school. How very vulnerable that school would be.
How many other schools are along the tracks? So many children suffered from asthma that the inhalers were lined up in a long row in the office. The grade for air an number at risk in Solano County is even greater with a particulate grade of D. Following are the numbers of people currently at risk. The trains would increase those numbers.

Total Population:	420,757	Risks to the population
Pediatric Asthma:	8,690	Risks to people with Asthma
Adult Asthma:	28,495	Risks to people with Asthma
COPD:	15,235	Risks to people with COPD
Cardiovascular Disease:	21,950	Risks to people with Cardiovascular Disease
Diabetes:	32,477	Risks to people with Diabetes
Children Under 18:	99,066	Risks to children and teens
Adults 65 & Over:	52,068	Risks to older adults
Poverty Estimate:	58,170	Risks to people with low incomes

Since there can be no mitigation for the air pollution caused by the trains as they travel, they should not be allowed and create even deaths and people at risks.

JAJ-03

It is my understanding that the approach from the south would be through the Los Angeles area and up the Pacific Coast. An approach from the north would enter California over Donner Pass, the Feather River Canyon, or Dunsmuir to Roseville, then go along the Amtrak Capitol Corridor from Martinez via Richmond, Berkeley and Emeryville to Oakland, and from there south along the Capitol Corridor or Coast Starlight route via Hayward, Fremont and Santa Clara to San Jose and on to Santa Maria. It would pass over water for urban, agricultural, recreational and wildlife habitat uses.
Those waters would be at risk.

JAJ-04

Tar sands are virtually impossible to clean up. Reference the spill in the Kalamazoo River in 2010. According to a report from Michigan Public Radio, property owners with damaged property still have many promised fixes that have not been addressed and the oil company is trying to make them sign off on all responsibility of the company
http://michiganradio.org/term/kalamazoo-river-oil-spill

JAJ-05

When the spill happened, it was 18 hours before a spill was reported. The regional EPA director estimated that it would take weeks to clear the river, months to clear the flood plains and several more months to clean oil out of the marsh. Well, that

was a poor estimation of what that effort would be since the clean up is still going on. The largest inland oil spill in U.S. history has cost Canadian energy giant Enbridge $1.21 billion to clean up – and they still have more than 200 million of expenses left as of November of this year. Michigan is fortunate to not have drought problems, in fact, they may have the opposite problem as the lake rises. However, if water is fouled in such a manner in California, it could be life threatening for large populations. JAJ-05 cont

I am alarmed to look at the map done by the Office of Spill Prevention and Response and see that the high risk areas are along routes proposed. High risk areas for accidents with water so precious in California. Reports are that little inspection is done on these rail sections and it is only recently that more inspectors have been hired to do minimum inspections. JAJ-06
These same routes have earthquake faults running along them

Who will be responsible for spills? How much insurance do they carry? Can they declare bankruptcy as did the company responsible for the Lac-Mégantic explosion where a town was wiped out, 47 people were incinerated and six million litres of light crude spilled over, under and through Lac-Mégantic. JAJ-07

Phillips has purchased DOT 111 cars and these cars are obsolete. They have been referred to as a Pepsi can on wheels. And the newer, improved cars are also vulnerable as witnessed in recent spills. JAJ-08

Our climate chaos is real and ever increasing. Lightening has put spills in pipelines and oil tanks. JAJ-09
http://www.weather.com/storms/tornado/news/north-texas-storms-impacts-20141013
And has there been consideration for lightening hitting oil trains?

Please, in the name of respect for the safety of thousands of people, in the name of respect for our precious water, in the name of respect for the air we breathe, in the name of respect for the legacy we leave next generations…please reject the Phillips 66 Railspur Proposal which would be harmful to/detrimental to safe cities, water sources, the air we breathe, our climate now and in the future. The risks are too great. JAJ-10

During WW II, we drastically changed our ways of doing things and everyone sacrificed with rationing. We need a war on climate chaos. Not to create more climate problems. We can do it.

Thank you for your attention to this important matter,

Sincerely,

Jean Jackman
306 Del Oro Ave
Davis, CA 95616

JAJ-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 hazards are included in the FEIR for the decision-makers' consideration as part of the County's deliberations on the proposed project.
JAJ-02	The RDEIR addresses the potential impacts and recommends mitigation measures for the proposed Project consistent with the requirements of CEQA. Section 4.3 (Air Quality and Greenhouse Gases) addresses GHG emissions, criteria air emissions and health risks. The EIR determined that air emissions would generate significant impacts. The commenter's statement about air issues are included in the FEIR for the decision-makers' consideration as part of the County's deliberations on the proposed project.
JAJ-03	The RDEIR addresses the potential impacts and recommends mitigation measures for the proposed Project consistent with the requirements of CEQA. Section 4.3 (Air Quality and Greenhouse Gases) addresses GHG emissions, criteria air emissions and health risks. The EIR determined that air emissions would generate significant impacts. The EIR proposed mitigation in the form of Tier 4 locomotives, which are substantially cleaner than many locomotive currently operating. However, this mitigation may be preempted by Federal requirement.
JAJ-04	Potential worst-case water quality impacts related to a rail accident has been addressed in Impact WR.3. Individual waterways that could be affected are shown on Figures 4.13-4 through 4.13-9 and in Tables 4.13-1 and 4.13-2. Water quality impacts from a spill along the mainline rail were concluded to be significant and unavoidable (Class I).
JAJ-05	Potential worst-case water quality impacts related to a rail accident have been addressed in Impact WR.3. Individual waterways that could be affected are shown on Figures 4.13-4 through 4.13-9 and in Tables 4.13-1 and 4.13-2. In addition, the tar sand spill into the Kalamazoo River was discussed in Impact WR.3 (see Section 4.13). Water quality impacts from a spill along the mainline rail were concluded to be significant and unavoidable (Class I).
JAJ-05	The RDEIR also provides separate discussions of specific issues associated with the change in crude slate and impacts associated with the unique qualities of Canadian Tar Sands and other crude oil sources. For example, Impact HM.3 provides a clear evaluation of potential impacts associated with potential changes in the refinery crude slate, while Impact WR.3 provides a detailed discussion of oil spill cleanup challenges associated with dilbit crudes.
JAJ-06	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 safety and environmental 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.
JAJ-07	CEQA does not require the issue of liability for spills to be addressed in an EIR. Under both Federal and state law UPRR is responsible for the costs associated damages and the costs associated with cleaning up any spill that occurs along the mainline rail routes. Recently passed legislation in California (SB 861) requires railroads to provide proof of adequate financial responsibility to cover the costs associated with clean up of a spill. OSPR is currently in the process of implementing the requirements of SB 861, which will require railroads to have detailed oil spill response plans and to conduct oil spill response drills. Oil Spill Contingency Plans are due January 1, 2016. However, the timing of when the plans will have to be in place and the drill would start is not yet know. Portions of this legislation as it relates to railroads have been subject to litigation, and it is likely that further litigation by the railroads will occur, since the railroad claim the State is preempted by federal law.
JAJ-08	Phillips 66 is proposing to use CPC-1232 tank cars, which are not the legacy DOT-111 cars. The RDEIR (see Section 4.7, Hazards and Hazardous Materials) found that with these tank cars the potential hazard impact along the mainline rail would be significant and unavoidable (Class I). The RDEIR recommends the use of Department of Transportation (DOT) Option 1 tank car design, which is substantially more robust than the CPC-1232. Even with the Option 1 tank car design, the potential hazard impact along the mainline rail would be significant and unavoidable (Class I). As discussed in Table 4.7.6 of the RDEIR, the CPC-1232 tank car design was not one that was being considered as part of the DOT rulemaking for new tank car designs. In May 2015 the DOT issued their final rules for high hazard flammable trains. The final rule is discussed in Section 4.7.5, Hazards and Hazardous Materials.
JAJ-09	Lightening is a very low probability event that was not considered in the risk analysis. Spills due to other factors have been included and the EIR determined that risks along mainline routes would be significant.
JAJ-10	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 water, air, and quality of life are included in the FEIR for the decision-makers' consideration as part of the County's deliberations on the proposed project.