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Cc: "p66-railspur-comments@co.slo.ca.us"
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Date: 11/19/2014 11:48 AM
Subject: opposition to the P66 Rail Terminal Project

To Mr. Murry Wilson, SLO County Planning Dpt.

It is difficult to fathom that such a project is even under consideration given the potential extreme hazards and catastrophes that it will present to the Central Coast.

520 oil trains coming through SLO County each year, each about 1.5 miles long crossing several road crossings such as Foothill - California and Orcutt, just name a few - - and adjacent to Cal Poly campus for quite a stretch. Is this really under serious consideration? JUE-01

The REIR clearly states that local emergency services are currently underfunded and underprepared to deal with these potential dangers. JUE-02

Emergency measures are in response to disasters, not methods to prevent such disasters. Seeing reportage films of oil tank train disasters in other parts of the country should leave one with with NO doubt that this proposal must never happen. JUE-03

Thank you,

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JUE-01	This comment does not address any concern or issue specifically related to the adequacy of the RDEIR or the proposed Project. As shown in Appendix A of the RDEIR each of the 80 tank cars and two buffer cars would be 60 feet long, and the three locomotives would be 90 feet long. This would make the total train length 5,190 feet (82*60+90*3=5,190), not 1.5 miles as stated in the comment.
JUE-02	The comment just states the fact that the EIR identified the fact that local emergency services are underfunded and not prepared for a rail accident. 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.
JUE-03	A number of the mitigation measures recommended in the EIR are preventative measures such as the safer tank car design, the use of positive train control, conducting risk assessments to choose the safest route, etc.