

Laurie Litman  
301 27th St  
Sacramento, CA 95816

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

November 24, 2014

Re: Comments on the Phillips 66 Rail Spur Extension Project

Dear Mr. Wilson,

Please add these comments to the public legal record on the Phillips 66 Rail Spur Extension Project.

I am a resident of Sacramento and my family lives a block away from the railroad tracks, at a location where there is a difficult railroad crossing and a new development that will cause more traffic over the tracks. Many years ago a train derailed there and a few years ago a man was struck and killed by a train at that crossing. The Phillips 66 Rail Spur Extension would add two trains a day to threaten our family and community. This is in addition to other Bay Area refinery expansions that may add another 5 or more trains/day. The cumulative effects of these dangerous trains going through our community are unacceptable! We ask you to reject the Phillips 66 Rail Spur Project for numerous reasons, all related to the dangers posed to the people, wildlife, and the environment affected by this project.

LIL-01

These oil trains are extremely dangerous, as evidenced by the many derailments, fires, and spills that have occurred in the last few years. But even without spills the dirty oil they carry will generate toxic emissions and greenhouse gas emissions that are unacceptable.

Tar sands are the dirtiest of crude oils. The danger of spills especially threatens our waterways as the bitumen sinks within hours to the bottom where it cannot be retrieved, while the added toxic diluents evaporate and cause toxic air pollution. Accidents can result in explosions depending on the particular diluents used to make the bitumen fluid enough to pour into tank cars. Tar sands are an intense carbon source, and gives off more greenhouse gas emissions than other oils. It also burns with high levels of sulfur dioxide. One byproduct is petroleum coke, which is left uncovered so particles can become airborne. Pet coke is too toxic to be allowed to burn in the U.S., but it is sold to China where it is burned in our shared atmosphere anyway. Tar sands means more carbon pollution. At every stage of the mining, transportation, and refining process, Canadian tar sands are more carbon intensive than other sources of oil. Bringing tar sands to California will undermine the state's efforts to be a global leader addressing climate disruption.

LIL-02

Oil trains create toxic air pollution every mile they travel in California. This is not just a problem for SLO, but for every community the trains pass through. The report admits that:

- (AQ.3): Operational activities of trains along the mainline rail route outside of SLO County associated with the Rail Spur Project would generate criteria pollutant emissions that exceed thresholds.
- (AQ.5): Operational activities of trains along the mainline rail route associated with the Rail Spur Project would generate toxic emissions that exceed thresholds.
- (AQ.6): Operational activities associated with the Rail Spur Project would generate GHG (greenhouse gas) emissions that exceed SLOCAPCD thresholds.

LIL-03

Finally, the dangers to our waterways should be enough to reject this project. We are in a drought and water is precious. A spill of tar sands oil into the Kalamazoo River is still not cleaned up after more than 3 years and a billion dollars spent. We cannot afford a spill into the American River or other sensitive environmental areas along the route of these trains.

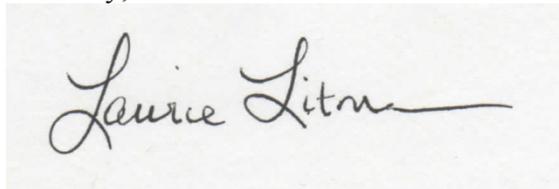
LIL-04

The IPCC has stated we have to stay within 2°C of temperature increase to avoid the worst of climate change. To do this we need to keep approximately 80% of known fossil fuel reserves in the ground. How can you approve a project that threatens the health of people up and down the rail line and continues to threaten future generations through the increased impacts of climate change?

LIL-05

We need courageous elected officials who are willing to step up and make a difference. There is no question that this project creates significant, unavoidable, and unnecessary risks for our communities and our climate. Please be courageous and reject it.

Sincerely,

A handwritten signature in black ink that reads "Laurie Litman". The signature is written in a cursive style with a long horizontal flourish at the end.

Laurie Litman

**Responses to Laurie Litman Comments**

LIL-01	<p>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 concludes that emissions of criteria pollutants, GHG and toxic pollutants would be above the thresholds and would be significant. Risks are discussed in the EIR section 4.7. Cumulative risks are also discussed in section 4.7. Risk are determined to be significant and unavoidable.</p> <p>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.</p>
LIL-02	<p>The refining of the different crude slate associated with this project would not produce different GHG emissions at the SMR than the normal range of crude oils refined at the SMR. Note that some Canadian crude oils are currently being processed at the SMR, transported by rail to Bakersfield, then by truck to the SMPS. GHG emissions are attributable to removal of the heavier ends, such as at the SMR, and associated with the cracking and formulation of lighter ends, such as gasoline, at the Rodeo Refinery. These activities would be within the range of normal activities at each refinery. The main difference in GHG emissions occurs at the extraction point, where extracting the tar sands generally produces substantially higher GHG per bbl of crude oil than convention methods, depending on the level of associated gas and the use of that gas. Some fields in California for example, extract the crude oil and just burn the associated gas in flares, which actually can produce a higher GHG intensity than even Canadian Tar Sands crude oils. The additional GHG emissions associated with mining the tar sands would occur no matter the destination of the crude oil, whether the crude oil is destined for the SMR, or other locations within the U.S.</p>
LIL-03	<p>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.</p>
LIL-04	<p>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, and includes the American River. 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).</p>
LIL-05	<p>The RDEIR states that GHG emissions associated with crude oil transportation</p>

## Responses to Laurie Litman Comments

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	<p>by rail would produce significant and unavoidable impacts. Emissions can be offset through the use of emissions offsets, as are available from a number of different sources for GHG. However, as indicated in Section 4.3 (Air Quality and Greenhouse Gases) of the RDEIR, it is uncertain if Air Districts could require GHG offsets due to Federal preemption and the impacts associated with the GHG emissions would remain significant and unavoidable.</p>
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