



COMMENTS ON THE
PHILLIPS 66 RAIL SPUR EXTENSION PROJECT
RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT

The following types of comments are effective in addressing the adequacy of the EIR:

- Content of the EIR.
- Methods on how environmental issues are analyzed.
- Potential Alternatives to the project.
- Potential mitigation measures that would avoid or reduce environmental issues.

- Content : Overwhelming as always. Incomplete. Irregardless of RR Fed. situation unit trains (500) each year thru County is preposterous. | LOR-01
- Methods : Using wrong premises and targets produces misleading information. | LOR-02
- Alternatives : A 1600+ Acre Regional Park which could influence the "PM" situation from the other area uses. | LOR-03
- Mitigation : Too many Cl. I unmitigated situations will remain if project is completed. | LOR-04

NAME: Roger Longden EMAIL: rlongden@pacbell.net
ADDRESS: 288 Almond St. PHONE: 805-234-6666
CITY: San Luis Obispo, CA 93405 → STATE: CA ZIP: 93405

Roger Longden
SLO CA 93405-2302

SANTA BARBARA
CA 931
17 NOV 2014 PM 2 T



Murry Wilson, Environmental Resource Specialist
County of San Luis Obispo
Department of Planning and Building
976 Osos Street, Room 300
San Luis Obispo, CA 93408-2040

93408+2040



288 Almond St.
San Luis Obispo, CA 93405
November 20, 2014

Mr. Murry Wilson
SLO County Dept. and Building
976 Osos St. Room 200
SLO, CA 93408

RE: F66 Rail/Spur Extension Project REIR

Dear Mr. Wilson:

After attending The Workshop at Mesa Middle School 2 weeks ago I mailed a roughed out card with Thoughts about the RE: Project. They included The 4 points: Content; Methods; Potential Alternatives; Potential Mitigation. Somehow I felt remiss about my own brevity and casualness. Please let me explain.

1. Content: If approved this could be one of the largest projects in SLO County. Construction as well as future plant activities and its supply line are huge. The 25 page executive summary **LOR-05** does not really do it justice. Any decision to proceed on this project will have long range and far reaching implications. The summary does not convey that.
2. Methods: speakers from the audience at the Workshop spoke to both the noise measurements and visual presentation **LOR-06** as being inadequate.
3. Alternatives: In an email sent this morning I elaborated on the "NO PROJECT" syndrome and those ramifications **LOR-07**
4. Mitigation: By my aforementioned mailed card, I still believe too many unmitigated situations will remain **LOR-08** if the project is approved, constructed and then becomes operational.

Thank you reading and please note the four emails sent this morning.

Sincerely,

Dogor E. Longden
ROGER EDWIN LONGDEN - M.S. Civil-Environmental Engineering
288 Almond St. SLO 93405

From: Roger Longden <rlongden@pacbell.net>
To: Roger Longden <rlongden@pacbell.net>
Date: 11/20/2014 06:04 AM
Subject: The P66 Rail Terminal Project REIR and Environmental Impacts

Good Morning,

The fact is that Environmental Impacts do affect Land Use and Community Design. Since this is the case, why does the subject REIR not truly address these impacts for Nipomo Residents. These impacts should also be alluded to for residents of all other communities which will experience a "pipeline on wheels" rolling through their areas on a fairly regular basis should the P66 project be approved.

LOR-09

As an aside I see no real direct mention of the proximity of the Union Pacific Rail Road Right of Way to the Salinas River Basin and associated tributaries. Granted that is not the immediate subject of the REIR. And we all know that the County may have its hands tied since the matter is although likely of Class One significance it is not subject to any mitigation effort via this REIR. Should Crude-by-Rail be delivered to the SMR Nipomo Plant at the rate of 50,000 barrels per day five times a week every week of the year the 6-1/2 cent per barrel tax for the Oil Spill Response Program spelled out on ES-24 of the REIR that will add up to \$845,000 per year. That I suspect will go into the State's General Fund. No mention is made of what the cost of one serious clean up effort along the Salinas River area might actually become based upon all of the prior experiences during recent years of this rapidly increasing oil transport scheme. How can executives make decisions without this kind of information?

LOR-10

Cheers,

Roger Edwin Longden

From: Roger Longden <rlongden@pacbell.net>
To: Roger Longden <rlongden@pacbell.net>
Date: 11/20/2014 07:01 AM
Subject: The P66 Rail Terminal Project REIR and the Union Pacific RR
Routing options.

Good Morning,

Crude-by-Rail may arrive at the P66 SMR in Nipomo from the North via Roseville to some extent.

Alternatively the same Unit Trains may be routed via Colton and arrive in Nipomo from the South.

Apparently the routing is subject to numerous factors mostly depending upon track conditions related to weather and other operational concerns.

That may have been addressed in the REIR. There being no way of knowing which is really the preferred routing for Union Pacific there is no way of knowing how SLO County and its communities might be affected by the "pipeline on wheels" activity. From the South would favor most of the County with less train traffic. For myself, it seems to me that the Colton and southern route would be the easier one for U.P. That is just from glancing at the routing map on ES-7.

Alternatively the Cuesta Grade into SLO Town and past CalPoly could become the route chosen.

Who knows? There are grand risks either way. That leaves the decision makers with ongoing unknowns to face. But, all of this could simply be passed on to others like Kern County where there recently was a lawsuit filed against the County, or Benicia where the State Attorney General has jumped into a similar fray. I vote to reject the REIR and let this entire mess be resolved by others.

Sincerely,

Roger Edwin Longden, M.S. Civil-Environmental Engineering
288 Almond Street, San Luis Obispo, CA 93405
805-234-6666

LOR-11

From: Roger Longden <rlongden@pacbell.net>
To: Roger Longden <rlongden@pacbell.net>
Cc: Phyllis Davies <phyllis@daviesco.com>
Date: 11/20/2014 07:45 AM
Subject: The P66 Rail Terminal Project REIR and Aesthetics and Visual Resources.

Good Morning,

The Executive Summary of the subject P66 REIR on ES-8 and Aesthetics and Visual Resources states "No Class I (significant and unavoidable) impacts. I am sorry. Should "oil trains" roll through SLO, every passage would have severe negative impacts on my own psyche. One should not expunge "feel" from the "look" or Visual. This is all about "Look and Feel". So the sounds of a train so close to where we live amongst trees and brooks would literally impact my own sense of well being. How about yours? Please make the right decision on this project REIR and reject it. Let P66 find its corporate well being in another activity.

LOR-12

Say the Project is rejected and the singular alternative of "No Project" is applied, then the Phillip Petroleum activities would continue until they became so unprofitable they would be encouraged to make whatever changes necessary. Who knows how that might develop? Why not a Regional County Park that could buffer the State Recreational Vehicle (PM10 generating) Area activities until they are somehow diminished?

LOR-13

Sincerely,

Roger Edwin Longden, M.S. Civil-Environmental Engineering
288 Almond Street, San Luis Obispo, CA 93405
805-234-6666

From: Roger Longden <rlongden@pacbell.net>
To: Roger Longden <rlongden@pacbell.net>
Cc: Phyllis Davies <phyllis@daviesco.com>
Date: 11/20/2014 08:34 AM
Subject: The P66 Rail Terminal Project REIR Executive Summary E-9 and
Air Quality

Good Morning,

The subject Summary states that Air toxic emissions at SMR (Santa Maria Refinery) would be significant and unavoidable (Class I) and then goes on to connect it to "cancer risk". I believe it is not that simple and it is not simply something to be deferred to the Federal Rail Administration where the County has no purview.

Talking about Tier 4 locomotives as being cleaner diesel machines is a distraction. They may never be used. So where does the County come in on that? So, we know that the route into the P66 site whether north or south will be an issue to be resolved by others.

The Plant itself where the REIR addresses its real concerns is still an enormous problem with unresolvable issues should this Project be approved. Why do I feel that way?

My own Nipomo based personal physician told me that his medical practice is seeing an increase in cases involving asthma. Sulfur at the Nipomo SMR as well as Particulate Matter which both contribute to asthmatic conditions will not decrease as a result of the subject Project and all the associated activities. What puzzles me is the Class III (less than significant impacts without mitigation) assigned to the Project during the Construction Phase should it be approved. One year of 200 employees in addition to the 140 now on site will enhance all of the associated problems of working in the sandy soil environment. Mitigation is always required during any construction of this kind. So how about ramping up the Class III to at least a Class II for Construction.

As far as the "Emissions Credits" offsetting whatever cannot be mitigated, that is unrealistic.

I do not believe that this activity should be allowed for this project.

Doing so would turn the entire senario into one very grand Corporate "Joke".

Sincerely,

Roger Edwin Longden, M.S. Civil-Environmental Engineering
288 Almond Street, San Luis Obispo, CA 93405
805-234-6666

LOR-14

Responses to Roger Longden Comments

LOR-01	A condensed version of the EIR is provided for in the Executive Summary. 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 Federal preemption are included in the FEIR for the decision-makers' consideration as part of the County's deliberations on the proposed project.
LOR-02	This comment does not identify a specific environmental analysis or CEQA issue relative to the EIR and compliance with CEQA. No further response is required.
LOR-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 significant unavoidable (Class I) impacts are included in the FEIR for the decision-makers' consideration as part of the County's deliberations on the proposed project.
LOR-05	The purpose of the Executive Summary is just to provide an overview of the project and the key impacts associated with the project. The Executive Summary states The reader should not rely exclusively on the Executive Summary as the sole basis for judgment of the Projects. Specifically, the EIR should be consulted for information about the environmental effects associated with the Projects and potential mitigation measures to address or minimize those effects.
LOR-06	The comment does not provide any specifics about the claimed inadequacies of the noise measurements and visual simulations. Therefore, no further response is required.
LOR-07	The RDEIR did not include a 1,660 acre regional park.
LOR-08	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 significant unavoidable (Class I) impacts are included in the FEIR for the decision-makers' consideration as part of the County's deliberations on the proposed project.
LOR-09	Please refer to Section 4.8 of the RDEIR, Land Use and Recreation, for a discussion of the Project's potential to result in significant land use effects, which identifies significant and unavoidable impacts on adjacent residents as a result of the Project. Because the UPRR mainline is currently used to transport crude oil throughout the state, the addition of up to five trains per week as a result of the Project was not considered a substantial change in use of the mainline. However, the RDEIR addressed potential effects of increased use of the mainline for crude oil transport under all issue areas (Section 4.1 through 4.13).

Responses to Roger Longden Comments

LOR-10	In Section 4.13, Water Resources, the Salinas River is listed (see Table 4.13.1) as one of the waterways that could be affected by an oil spill in the event of a rail accident. Impacts to water quality from an oil spill were found to be significant and unavoidable (Class I).
LOR-11	This comment does not identify a specific environmental analysis or CEQA issue relative to the EIR and compliance with CEQA. The comments about what rail route would be used are included in the FEIR for the decision-makers' consideration as part of the County's deliberations on the proposed project.
LOR-12	The RDEIR describes an unloading of up to five trains per week, with a maximum of 250 allowed per year. With this average of less than one additional train per day, noticeably new activity would be minimal. In addition, in the project vicinity, because of viewing distance, existing topography, intervening vegetation, and the required screening berm, ground plane activity would not be easily noticed from the majority of public viewpoints. The same conditions which preclude visibility of much of the existing oil processing facility activity would also preclude much of the visibility of the proposed unloading facility and rail spur tracks.
LOR-13	This comment does not identify a specific environmental analysis or CEQA issue relative to the EIR and compliance with CEQA. No further response is required.
LOR-14	<p>The RDEIR addresses the potential impacts and recommends mitigation measures for the proposed Project consistent with the requirements of CEQA. Section 4.0 presents the environmental analysis for the CEQA mandated issue areas; air quality and GHG impacts are discussed in Section 4.3 (Air Quality and Greenhouse Gases).</p> <p>Tier 4 locomotive are being produced at this time by multiple manufacturers and will start to be used in 2015. They will eventually comprise a substantial portion of the locomotive fleet as older locomotives are replaced or rebuilt.</p> <p>Operational activities at the rail spur are not anticipated to produce additional non-diesel related particulate matter into the area. Construction activities, with SLOCAPCD measures, would reduce construction particulate matter emissions below the thresholds.</p>