From: "Jack Mauger" <JackMauger@verizon.net>
To: <p66-railspur-comments@co.slo.ca.us>
Date: 11/19/2014 11:05 AM
Subject: Phillips 66 Rail Spur Project

Greetings,

I am a resident of Trilogy in Nipomo, a community that will be significantly adversely impacted by the Phillips 66 Rail Spur Project if approved and implemented. However, in this email, I will focus more broadly on the potential impacts to San Luis Obispo County.

Shipping oil by rail involves the risk of derailment, spillage, possible explosions/fires, and the resulting contamination. There have been several highly publicized examples of what can happen – most notably the Lac-Megantic (Quebec) derailment and explosion (July 6, 2013). California has rated the rail line down Questa Grade as very high risk. If a train of 80 DOT-111 tanker cars were to lose control and derail in the vicinity of San Luis Obispo, the result could be catastrophic, with a major university, hospitals and a community of over 50,000 at risk. San Luis Obispo County lacks an adequate number of HazMat resources to deal with such a disaster should it occur; the nearest certified HazMat team is in Solvang.(See map at http://california.maps.arcgis.com/apps/OnePane/basicviewer/index.html?appid=928033ed043148598f7e511a95072b89 .) The Phillips 66 REIR admits that consequences of such a derailment would be significant and unavoidable. I have attached an article from a recent Time magazine that addresses issues relating to the DOT-111 tanker cars and the recent dramatic increase in oil-by-rail activity. I understand that Phillips have purchased a large number of DOT-111 tanker cars. MAJ-01

I have heard that there is a new tanker car design called DOT-117 that addresses the deficiencies of the DOT-11 cars, but they are not yet available. Until a safer tanker car is available, I think the combination of DOT-111 cars, a rail system that has been neglected for decades, and the high risk associated with the Questa Grade rail line, it would be irresponsible to approve the Phillips 66 Rail Spur project. MAJ-02

Jack Mauger
1171 Kristen Court
Nipomo(See attached file: Oil Trains.pdf)

Spotlight

Crude Awakening

The shale-oil boom is ferrying a new danger to America's freight railways

BY MICHAEL SCHERER

THE LATEST FIREBALL ERUPTED ALONGSIDE the parking lot of a children's museum in Lynchburg, Va., a near worst-case scenario for the feds scrambling to get a handle on the nation's new danger: oil tankers that detonate like bombs when they slide from the tracks.

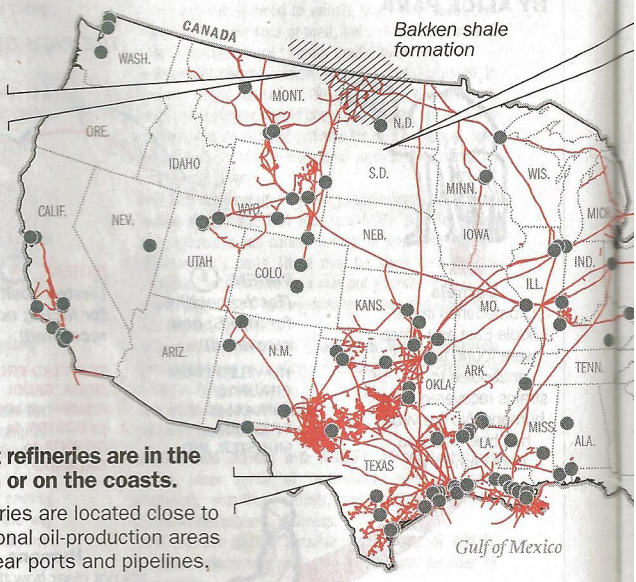
America's rails are teeming with black gold these days, and as accidents from Canada to Alabama have shown, this new cargo, largely from the Bakken reserves of North Dakota, has an alarming tendency to ignite. Most of it is carried in tank cars that have been deemed unsafe for the task, and federal rulemaking that will mandate changes is months from completion. In the meantime, railroads have adopted some voluntary measures, like reducing speeds and rerouting trains from urban areas, while the oil industry has cautioned against any new rules that impose too high a cost on the booming sector.

Luckily, no one was hurt in the April 30 Virginia accident; the museum was evacuated safely and is open for business. But for the millions of Americans who live and work near the nation's tracks, the danger remains.

Graphic by Lon Tweeten and Emily Maltby

THE SHIPPING PROBLEM

Fracking is producing record amounts of oil, but limited networks exist for shipping crude to refineries.



1 Oil in the northern plains is booming ...

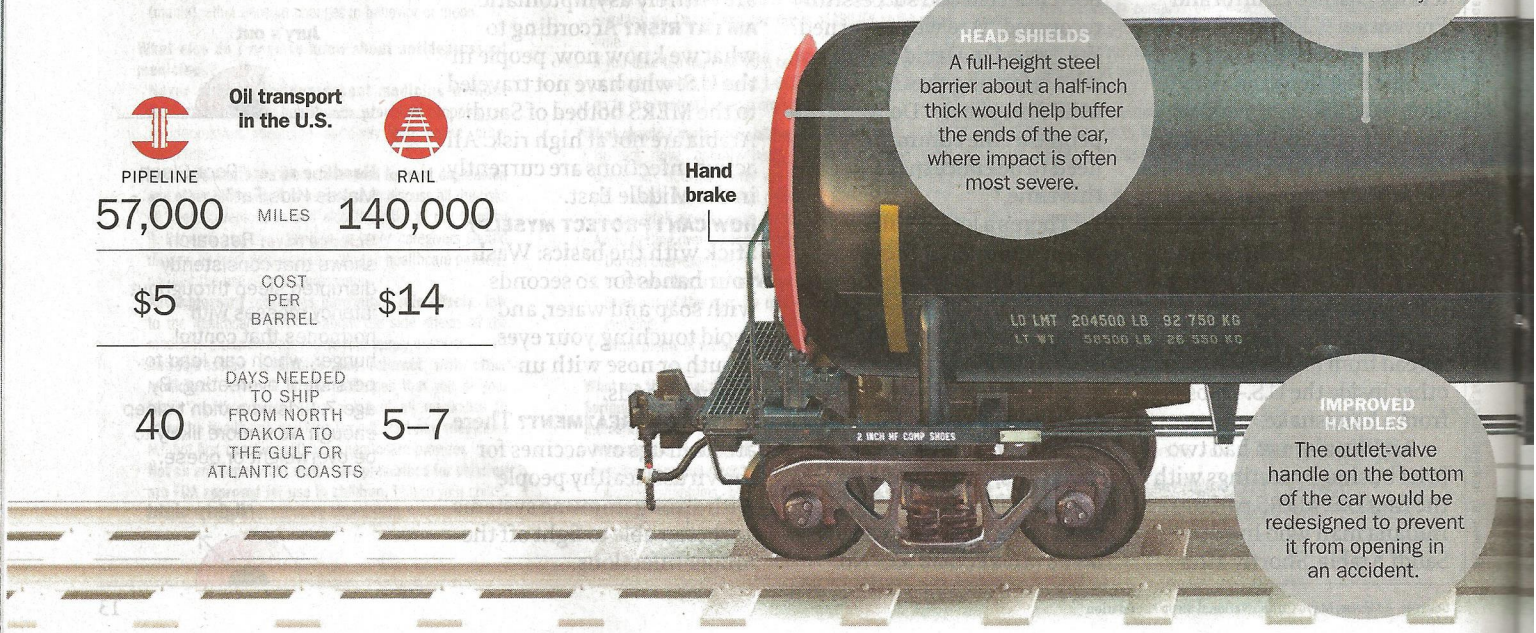
In the past five years, crude-oil extraction from the Bakken shale deposits has surged to twice the output of Alaska.

2 ... but refineries are in the South or on the coasts.

Refineries are located close to traditional oil-production areas and near ports and pipelines.

HOW TO MAKE IT SAFER

The DOT 111 is a popular tank car, but it is vulnerable in accidents, particularly when carrying flammable liquids. Here are suggestions from rail-industry groups to make the car safer.



SOLID TANK
To prevent punctures, a new steel tank would be nearly 30% thicker than the tanks transporting crude oil today.

HEAD SHIELDS
A full-height steel barrier about a half-inch thick would help buffer the ends of the car, where impact is often most severe.

IMPROVED HANDLES
The outlet-valve handle on the bottom of the car would be redesigned to prevent it from opening in an accident.

Oil transport in the U.S.

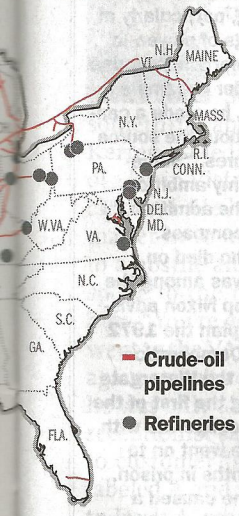
	PIPELINE		RAIL
MILES	57,000		140,000
COST PER BARREL	$5		$14
DAYS NEEDED TO SHIP FROM NORTH DAKOTA TO THE GULF OR ATLANTIC COASTS	40		5–7

1.1 MILLION
GALLONS LOST LAST YEAR

3

Pipelines don't have the capacity ...

Pipelines were built to connect wells to refineries. Few pipelines exist in the Bakken.



4

... so railcars are filling the void.

Railroads transported about 400,000 tank cars of crude oil last year, up from 9,500 in 2008. Much of the increase is from Bakken oil, which may be more flammable and thus more dangerous in an accident.

APRIL 30

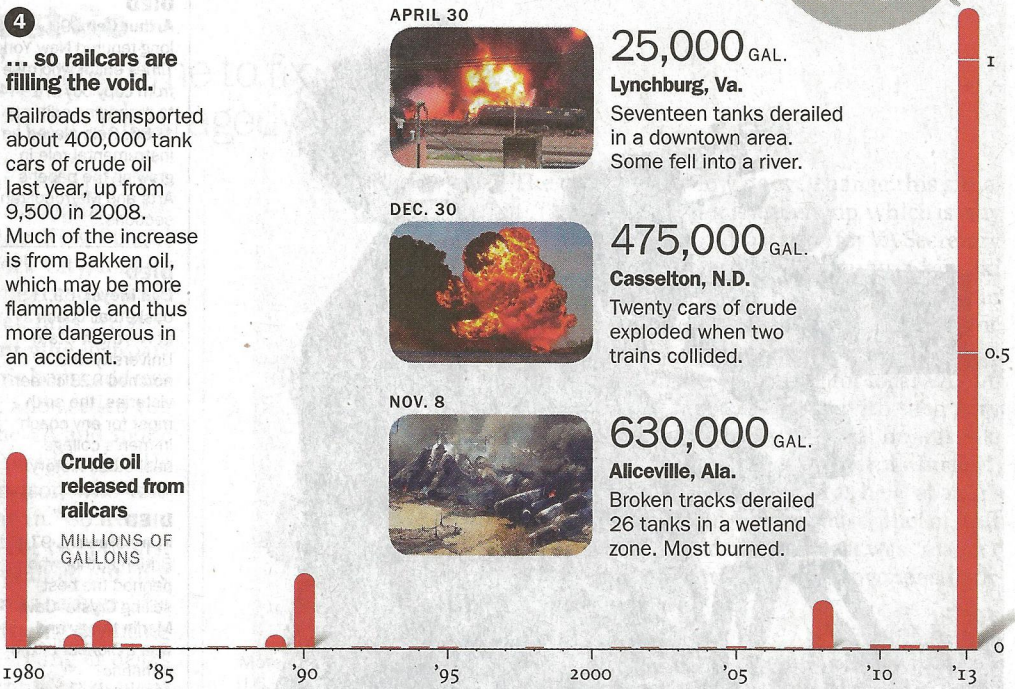
25,000 GAL.
Lynchburg, Va.
Seventeen tanks derailed in a downtown area. Some fell into a river.

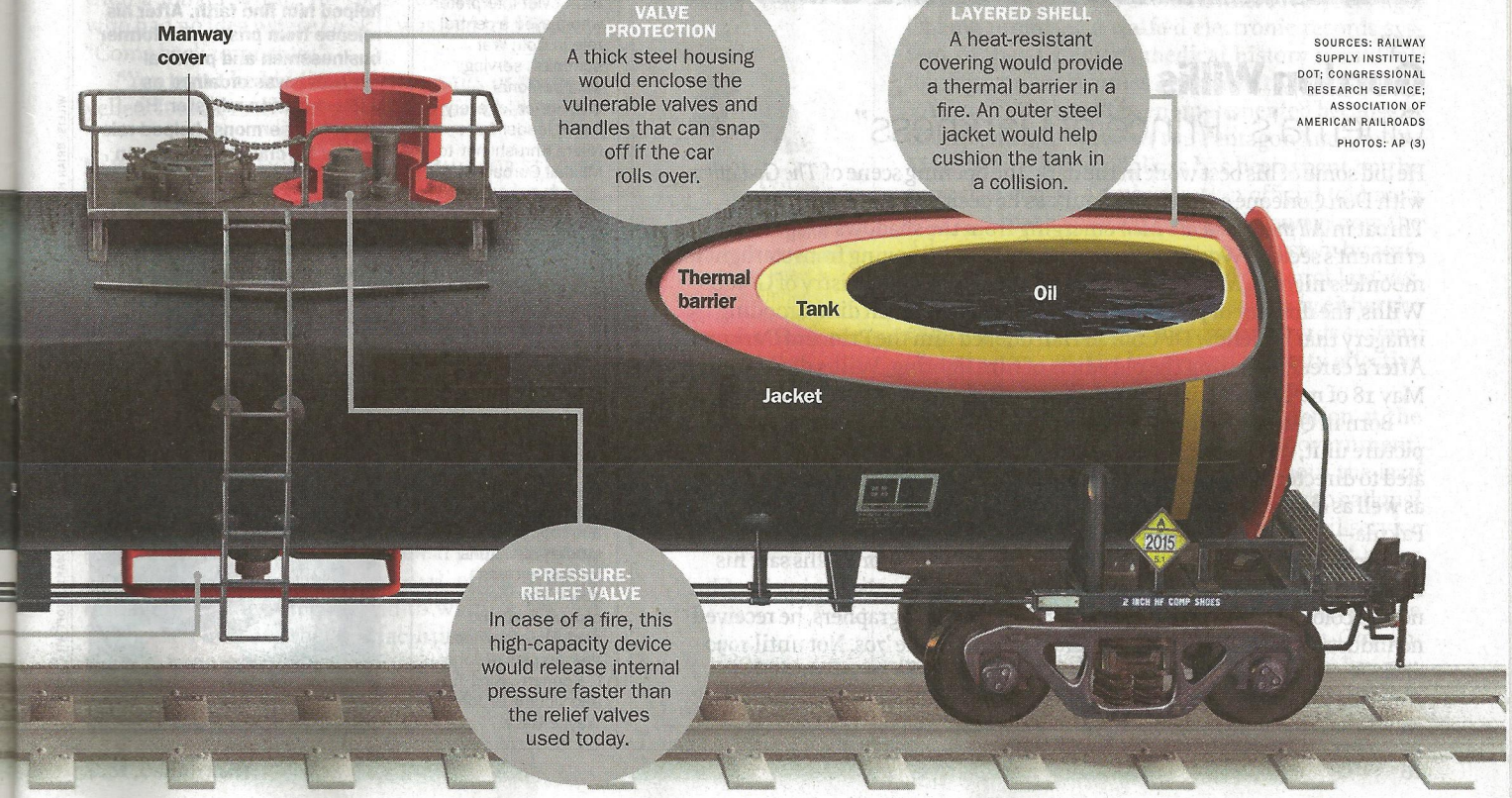
DEC. 30

475,000 GAL.
Casselton, N.D.
Twenty cars of crude exploded when two trains collided.

NOV. 8

630,000 GAL.
Aliceville, Ala.
Broken tracks derailed 26 tanks in a wetland zone. Most burned.





SOURCES: RAILWAY SUPPLY INSTITUTE; DOT; CONGRESSIONAL RESEARCH SERVICE; ASSOCIATION OF AMERICAN RAILROADS

PHOTOS: AP (3)

From: "Jack Mauger" <JackMauger@verizon.net>
To: <p66-railspur-comments@co.slo.ca.us>
Date: 11/20/2014 12:51 PM
Subject: Phillips 66 Rail Spur Project

Greetings,

I am a resident of Trilogy in Nipomo, and I have very serious concerns over impact of the Phillips 66 Rail Spur Project on our community if the project is approved and implemented. It would adversely impact the Trilogy community in many ways. These include:

1. Visual – The proposed rail spur, the lighting, and support facilities would be visible to some of the homes, some of the streets, and parts of the Monarch Dunes golf course (a public facility). The photos depicted in the REIR were taken from Highway 1, which borders Trilogy on the west. The homes and streets I refer to are considerably higher than the points from which the photos in the REIR were taken. KVA-1 (page 4.1-16 of the REIR) is at 146 feet above sea level, and KVA-2 (page 4.1-17 of the REIR) is at 208 feet. Via Concha and Louise Lane (within Trilogy) reach about 290 feet above sea level. There are about two dozen homes and yet to be built-on lots in this area that are prized for their ocean view – not their tanker car view. The T-box for hole 2 of Monarch Dunes is also in this area. The proposed rail spur area would be clearly visible in this area and would not be hidden by the berm proposed. The 3rd, 4th, 5th, and 6th fairways all parallel Highway 1 with a thin screen of eucalyptus trees in between and would likely be exposed to a view of the rail spur. The lighting at night would also ruin the views from the back yards of homes in this area; home owners typically spend tens (and sometimes hundreds) of thousands of dollars landscaping their back yards for outdoor evening entertainment. The current Phillips 66 facility is hidden by a stand of eucalyptus trees, though at night the current Phillips 66 lighting is visible through the trees. MAJ-03

2. Air pollution – The exhaust from the increased train activity and the supporting diesel truck would add to the air pollution in a part of the county that already violates California air quality several weeks per year. There are many retired people residing in Trilogy (and nearby Black Lake Country Club) some of whom suffer from breathing problems; this increased pollution level would increase their problems and likely discourage other retirees from moving to this area. MAJ-04

3. Sound – The sounds of tank cars rolling in and out along with the noise of supporting trucks and other machinery would also impact the western portions of the Trilogy community and probably beyond. (I live in the far eastern edge of Trilogy and can sometimes hear the trains going by.) MAJ-05

4. Increased risk – With five trains of 80 DOT-111 tanker cars each coming and going each week, the risk of derailment and spills would increase dramatically for Trilogy residents (and the rest of SLO County). MAJ-06

5. Odor – Some of my friends in the Trilogy community claim to have actually smelled discharges from the current Phillips 66 operations. Bringing crude oil in by tanker car would likely increase the frequency of such odorous events. MAJ-07

6. Property values – Having the kind of facility proposed by Phillips 66 so visible would be likely to negatively impact our property values. It could also slow the growth of Trilogy and negatively impact property taxes for San Luis Obispo County. When my wife and I were looking at properties at Trilogy (before signing a contract), we once drove to Trilogy via Highway 1 from Pismo. We were unpleasantly surprised to see the Phillips 66 refinery so close to Trilogy. When it was explained to us that they received their crude oil by pipeline and were a relatively benign industrial facility, our concerns were somewhat relieved. The proposed rail spur would dramatically change that. MAJ-08

I suspect that Phillips 66 is proposing this project for the sole purpose of taking advantage of the low-cost crude oil now being produced in Alberta and North Dakota. This would increase their profit margins over what they currently realize from the processing of more expensive (also less hazardous and cleaner) crude oil produced in California. MAJ-09

Jack Mauger

From: "Jack Mauger" <JackMauger@verizon.net>
To: <p66-railspur-comments@co.slo.ca.us>
Date: 11/24/2014 04:56 PM
Subject: Phillips 66 Rail Spur Project

Greetings,

In case someone tries to justify approval of the Phillips 66 Rail Spur project by claiming it will generate jobs, I'd like to comment on this and the potential economic impact it would have.

The rail spur project is expected to generate "no more than 12" permanent jobs, which would have a small positive impact on the county. The negative impact the project could have to Trilogy (in slowing and/or limiting growth) could have a much larger negative impact on the counties tax revenues (both sales and property taxes). The Trilogy has sold 595 homes to date and has plans to increase that number to 1,320 by the end of phase 2. There are also plans for commercial and light industry development that will provide new jobs in time (probably many times the 12 that Phillips 66 would add). In addition to overt new jobs, many of the Trilogy residents are retirees who bring their retirement savings to San Luis Obispo County and spend much of it in the local economy. MAJ-10

It would seem brain-damaged to me to jeopardize the significant, positive impact of Trilogy's continued growth for the trivial addition of 12 jobs created by Phillips 66. This is to say nothing of the negative environmental impact of the rail spur project or the increased risk of a major oil spill disaster.

Jack Mauger

MAJ-01	Phillips 66 has proposed a state-of-the-art fire protection system for the rail spur unloading rack. This fire protection system would be reviewed and approved by Cal Fire prior to commencing operations at the new unloading facility. The RDEIR contains numerous mitigation measures in Section 4.11, Public Services and Utilities, to ensure that the SMR Fire Brigade and the Cal Fire resources are sufficient before the project proceeds. These mitigation measures would be funded by Phillips 66 for the SMR requirements, and Phillips 66 and others for improvements along the mainline track, most likely as part of a "fair share" type arrangement. The mitigation measures at the SMR 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/County 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 29CFR 1910.120 compliance. The RDEIR contains a considerable amount of mitigation that may be within the jurisdiction of San Luis Obispo to require prior to project operations that address the potential for accidents, oil spills and emergency response. These include: Class I Impact HM.2 The potential for a crude oil unit train derailment would increase the risk to the public in the vicinity of the UPRR right-of-way. 1. HM-2a Only rail cars designed to FRA, July 23, 2014 Proposed Rulemaking Option 1: PHMSA and FRA Designed Tank Car as listed in Table 4.7.8, shall be allowed to unload crude oil at the Santa Maria Refinery. 2. HM-2b For crude oil shipments via rail to the SMR a rail transportation route analysis shall be conducted annually. The rail transportation route analysis shall be prepared following the requirements in 49 CFR 172.820. The route with the lowest level of safety and security risk shall be used to transport the crude oil to the Santa Maria Refinery. 3. HM-2c The Applicant's contract with UPRR, shall include a provision

	to require that Positive Train Control (PTC) be in place for all mainline rail routes in California that could be used for transporting crude oil to the SMR. 4. HM-2d The refinery shall not accept or unload at the rail unloading facility any crude oil or petroleum product with an API Gravity of 30° or greater. Class I Impact PS.4 Operations of the crude oil train on the mainline UPRR tracks would increase demand for fire protection and emergency response services along the rail routes. 1. PS-4a As part of the Applicant's contract with UPRR, it shall require that quarterly hazardous commodity flow information documents are provided to all first response agencies along the mainline rail routes within California that could be used by trains carrying crude oil to the Santa Maria Refinery for the life of the project. Only first response agencies that are able to receive security sensitive information as identified pursuant to Section 15.5 of Part 15 of Title 49 of the Code of Federal Regulations, shall be provided this information. This contract provision shall be in place and verified by the County Department of Planning and Building prior to delivery of crude by rail to the Santa Maria Refinery. 2. PS-4b Only rail cars designed to FRA, July 23, 2014 Proposed Rulemaking Option 1: PHMSA and FRA Designed Tank Car shall be allowed to unload crude oil at the Santa Maria Refinery. PS-4c As part of the Applicant's contract with UPRR, it shall require annual funding for first response agencies along the mainline rail routes within California that could be used by the trains carrying crude oil to the Santa Maria Refinery to attend certified offsite training for emergency responders to railcar emergencies, such as the 40 hour course offered by Security and Emergency Response Training Center Railroad Incident Coordination and Safety (RICS) meeting Department of Homeland security, NIIMS, OSHA 29CFR 1910.120 compliance. The contract shall require funding of a minimum of 20 annual slots per year for the life of the project. This contract provision shall be in place and verified by the Cal Fire/County Fire prior to delivery of crude by rail to the Santa Maria Refinery. 3. PS-4d As part of the Applicant's contract with UPRR, it shall require annual emergency responses scenario/field based training including Emergency Operations Center Training activations with local emergency response agencies along the mainline rail routes within California that could be used by the crude oil trains traveling to the Santa Maria Refinery for the life of the project. A total of four training

	sessions shall be conducted per year at various locations along the rail routes. This contract provision shall be in place and verified by the Cal Fire/County Fire prior to delivery of crude by rail to the Santa Maria Refinery. 4. PS-4e As part of the Applicant's contract with UPRR, it shall require that all first response agencies along the mainline rail routes within California that could be used by trains carrying crude oil traveling to the Santa Maria Refinery be provided with a contact number that can provide realtime information in the event of an oil train derailment or accident. The information that would need to be provided would include, but not be limited to crude oil shipping papers that detail the type of crude oil, and information that can assist in the safe containment and removal of any crude oil spill. This contract provision shall be in place and verified by the Cal Fire/County Fire prior to delivery of crude by rail to the Santa Maria Refinery. Class II Impact PS.3 The Rail Spur Project would increase demand for fire protection and emergency response services at the SMR. 1. PS-3A Prior to issuance of construction permits, the Applicant shall submit to Cal Fire/County Fire for review and approval a final Fire Protection Plan for the Rail Spur Project that meets all the applicable requirements of API, NFPA, UFC, and Cal Fire/County Fire. 2. PS-3b Prior to notice to proceed for the rail unloading facility, the Applicant shall update the SMR Emergency Response Plan to include the rail unloading facilities and operations. 3. PS-3c Prior to notice to proceed for the rail unloading facility, the Applicant shall update the existing SMR Spill Prevention Control and countermeasure Plan to include the rail unloading facilities and operations. 4. PS-3d Prior to notice to proceed for the rail unloading facilities, the Applicant shall assure that the existing SMR fire brigade meets all the requirements outlined in Occupational Safety and Health Administration 29 CFR 1910.156, and NFPA 600 & 1081. 5. PS-3e Prior to issuance of grading permits, the Applicant shall have an executed operational Memorandum of Understanding (MOU) with Cal Fire/County Fire that includes fire brigade staffing/training requirements and Cal Fire/County Fire funding requirements. This MOU shall be reviewed and updated annually by Cal Fire and the Applicant. 6. PS-3f Prior to issuance of grading permits, the Applicant shall have an agreement to reimburse Cal Fire/County Fire for time spent by a qualified fire inspector to conduct the annual fire inspections at the

	SMR including all structures, and support facilities consistent with Cal Fire/County Fire's authority and jurisdiction. The Applicant shall reimburse all costs associated with travel time, inspections, inspection training, and documentation completion. The reimbursement rate shall be according to the most recent fee schedule adopted by the San Luis County Board of Supervisors. 7. PS-3g Prior to issuance of grading permits, the Applicant shall have an agreement to reimburse Cal Fire/County Fire for offsite training for emergency responders to railcar emergencies, such as the 40 hour course offered by Security and Emergency Response Training Center Railroad Incident Coordination and Safety (RICS) meeting Department of Homeland security, NIIMS, OSHA 29CFR 1910.120 compliance. Initial training shall be two members of the Interagency Hazardous materials Response Team, two members of the interagency Urban Search and Rescue Team, and two members annually from Cal Fire/County Fire or fire districts in San Luis Obispo that have automatic aid agreements with Cal Fire/County Fire for a total of six slots per year for the life of the project. 8. PS-3h Prior to issuance of grading permits, the Applicant shall have an agreement to reimburse Cal Fire/County Fire for Fire Chief Officer attendance such as the 40 hour course offered by Security and Emergency Response Training Center; Leadership & Management of Surface Transportation Incidents. Funding shall be for two Fire Chief Officers annually for the life of the project. 9. PS-3i Prior to issuance of grading permits, the Applicant shall have an agreement with Cal Fire/County Fire to conduct annual emergency response scenario/field based training including Emergency Operations Center Training activations with the Applicant, Cal Fire/County Fire, UPRR, and other San Luis Obispo County First response agencies that have mutual aid agreements with Cal Fire/County Fire. These annual emergency response drills shall occur for the life of the project. Even with the implementation of the above mitigation to reduce the potential for a rail accident and increase local emergency response capabilities, the potential risk associated with the proposed project is considered Significant and Unavoidable (Class I).
MAJ-02	As noted in the RDEIR, the current DOT-111 tank cars have serious safety deficiencies that can lead to an unacceptable spill rate in the event of a train derailment. As a result, the RDEIR specifically included mitigation measure HM-2a, which requires only rail cars designed to Option 1: PHMSA and FRA Designed Tank Car as listed in Table 4.7.6, shall be allowed to unload crude oil at the Santa Maria Refinery. Even with the improved rail cars, the RDEIR found that the risk of a crude oil train accident and spill was considered a

	Significant and Unavoidable (Class I) impact.
MAJ-03	The project proposes to the construct the unloading facility and rail spur tracks adjacent to the southern slopes of a natural landform ridge. This adjacent landform rises to elevations ranging from approximately 120 to 145 feet above sea level. The proposed rail spur tracks are proposed at an elevation of approximately 94 feet above sea level, which would be as much as 55 feet lower than the landform to the north. As a result, views of the unloading facility and railroad spur from the north and the northeast would be substantially blocked. In addition, the eastern segment of the rail spur tracks, closest to Highway 1, are proposed to be constructed in an excavated area maintaining the approximately 94-foot elevation while the adjacent ground rises up eastward, resulting in the easternmost end of the tracks being approximately 20 feet below the surrounding natural terrain. This elevation difference, along with the required 10 to 20-foot tall mitigation berm, would combine for an approximately 30 to 40-foot tall earthen visual screen around the eastern end of the railroad spur. This berm height in combination with the natural ridge to the north will be sufficient to reduce visibility of the project to a less than significant level for viewpoints from the east, including elevated viewpoints in the Trilogy residential and recreation areas.. The RDEIR Aesthetics section considers all public viewpoints surrounding the project, and specifically addresses viewpoints associated with the developments east of Highway 1. The project location was directly viewed and analyzed from each of these potential viewpoints. The analysis, potential impacts and mitigation measures identified in the RDEIR Aesthetic section include and specifically address views from the residential and recreational developments east of Highway 1. Key Viewing Areas (KVAs) along Highway 1 provide a fair representation of how the majority of the public will experience the project. Highway 1 has the greatest traffic volume, is the closest public roadway and is a primary regional and local transportation route. KVAs along Highway 1 were positioned at major entrances to the Trilogy and other east side development to further increase their representative value. KVA-2, at the intersection of Highway 1 and Via Concha is at an elevation of approximately 200 feet above sea level. The closest residential street (and golf course) east of the project is at an elevation of approximately 235 feet above sea level. Potential viewpoints along Louise Lane and Eucalyptus Road rise to approximately 250 feet above sea level. Although the 35 to 50-foot viewpoint elevation difference between Highway 1 and the viewpoints to the east is not substantial when applied to the 0.5 to 1.5 mile viewing distance, field analysis showed that some public viewpoints would have slightly increased visual exposure to the project compared to views from Highway 1. This increased visual exposure would mostly occur through the 600-foot gap in the existing approximately one-mile long windrow of

	mature eucalyptus trees paralleling the east side of Highway 1. The RDEIR analyzed views from these elevated viewpoints, and includes mitigation measures which would minimize visual impacts from these areas. In addition, field review showed that this somewhat increased exposure also includes greater visibility of the existing Santa Maria Refinery, coke processing facility, railroad tracks and other development. As seen from these elevated locations the project would not block views of the Pacific Ocean, coastline, dunes, riparian corridors, or agricultural field patterns. Direct observation showed that from the vast majority of potential public views within the developed and recreation areas east of Highway 1, views of the project would be substantially or completely blocked by some combination of intervening vegetation, landform, distance or existing residential and recreational development. The lighting associated with the unloading facility would be viewed at a distance of approximately 1.5 miles or more from viewpoints east of Highway 1, and would be seen in the context of the Santa Maria Refinery immediately to the north. In addition the unloading facility proposes a covered canopy over the majority of the area, which would decrease light-trespass. Similar to the lack of visibility of the existing oil refinery's illuminated ground-plane, intervening topography would block views of the illuminated ground-plane of the unloading facility as seen from Highway 1 and the residential areas to the east. Although the unloading facility lights would introduce light into a new area, with applied mitigation measures they would not appear out of place given the relatively close proximity to the existing refinery and coke processing facility, which emits high levels of industrial lighting throughout the night, every night of the year. In addition to the applicant-proposed lighting features such as downward-directed lights with fully shielded lenses, the RDEIR requires substantial mitigation measures that will minimize lighting impacts. Mitigation measures include that the lighting plan be based on a photometric study prepared by a qualified engineer who is an active member of the Illuminating Engineering Society of North America (IESNA), using guidance and best practices endorsed by the International Dark Sky Association. Mitigation measures preclude illumination of adjacent slopes, prohibit placement of perimeter lights (which as previously described would be 15-feet tall) east of the screening berm (which as previously described would be 10 to 20- feet tall), and require the use of motion detectors rather than being continuously on. Importantly, following project completion the RDEIR requires the preparation of a Lighting Evaluation Report for review and approval by the County Department of Planning and Building prepared by a qualified lighting engineer not involved in the design of the original lighting plan. The Lighting

	Evaluation Report will conduct a comprehensive evaluation of in-place lighting, under all expected circumstances, and will require correction of any unexpected or residual lighting impacts based on direct observation of the completed project. The air quality mitigation that would limit rail car unloading from between 7 A.M. and 7 P.M. would also serve to reduce the nighttime lighting impacts to less than significant.
MAJ-04	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 the project would produce emissions that exceed the thresholds and would produce 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.
MAJ-05	Noise levels along the mainline and at the SMR would increase with the additional trains. Noise levels along the mainline are addressed in Section 4.9 (Noise and Vibration) under impact N.3. Noise levels at the SMR are discussed in Section 4.9 under impacts N.1 for construction and N.2 for operations. Based on in-field monitoring and modeling, noise impacts would be less than significant with mitigation (Class II).
MAJ-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.
MAJ-07	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 the project would produce emissions that exceed the thresholds and would produce 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.
MAJ-08	The issue of property values is an economic issue. CEQA does not require an evaluation of economic or social impacts, and states that "economic or social effects of a project shall not be treated as significant effects on the environment" unless those effects result in physical changes to the environment (CEQA Guidelines Section 15131). Although it is speculative if housing values would be impacted by the Rail Spur Project since it would be located mostly within an existing industrial areas, these effects would not constitute or cause a physical change in the environment above those already described and

	discussed in the RDEIR.
MAJ-09	The comment does not identify a specific environmental analysis or CEQA issue relative to the EIR and compliance with CEQA. The commenter's statements about Phillips 66 profits are included in the FEIR for the decision-makers' consideration as part of the County's deliberations on the proposed project.
MAJ-10	The issue of jobs and tax revenues for the County is an economic issue. CEQA does not require an evaluation of economic or social impacts, and states that "economic or social effects of a project shall not be treated as significant effects on the environment" unless those effects result in physical changes to the environment (CEQA Guidelines Section 15131). Although it is speculative if continued development in Trilogy would be impacted by the Rail Spur Project since it would be located mostly within an existing industrial areas, these effects would not constitute or cause a physical change in the environment above those already described and discussed in the RDEIR.