From: pamela rhodes <rhodes4764@att.net>
To: "P66-railspur-comments@co.slo.ca.us"
<P66-railspur-comments@co.slo.ca.us>
Date: 11/23/2014 08:44 AM
Subject: Phillips 66 railspur extension project

Dear Mr. Wilson:

We are residents of Davis and the proposed 80-car crude oil train to the Santa Maria refinery will travel through our town. We are concerned for many reasons, four of which appear below: RHP-01

Earthquake Faults

The Office of Spill Prevention and Response map reveals earthquake faults that lie just south of Davis along the rail to Benicia and the corridor to San Luis Obispo.
Seismic instability is a reason to avoid train deliveries of volatile material. RHP-02

Dangers for the State

All three northern routes bring trains over identified high risk rail sections including Dunsmuir (site of a spill that killed life in the Sacramento River for 35 miles), Donner Pass, and the Feather River Canyon with long stretches of rail on high wooden trestles. RHP-03

Dirtiest of Crude Oils

Tar sands are the dirtiest of crude oils and spills would be difficult to clean up and would threaten our waterways. Tar sands give off more ghg emissions and exacerbate climate change. RHP-04

Liability

Phillips 66 and UP and BNSF railroads have not offered sufficient liability to cover a serious accident or spill. RHP-05

We hope that the San Luis Obispo Count Board of Supervisors will reject the Phillips 66 Rail Spur Proposal which if enacted would harm our environment and create health and safety issues for California citizens. RHP-06

Thank you for your thoughtful consideration of this important decision.

Sincerely,

Pam Rhodes
Michael Wright

RHP-01	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.
RHP-02	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 faults along the mainline rail routes are included in the FEIR for the decision-makers' consideration as part of the County's deliberations on the proposed project. The historical data used to estimate the probability of a train derailment would include any derailments that resulted for ground shaking during an earthquake.
RHP-03	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.
RHP-04	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. The main difference in GHG emissions occurs at the extraction point, where extracting the tar sands generally produces 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. Current CARB requirements (LCFS) already require refineries to disclose the carbon intensities of the crude oil they refine.
RHP-05	Issues of liability are not required to be addressed as part of the CEQA process.

	Under both Federal and state law, UPRR is responsible for costs associated with cleaning up any spill that occurs along the mainline rail routes.
RHP-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 health, safety, and the environment are included in the FEIR for the decision-makers' consideration as part of the County's deliberations on the proposed project.