

From: Amanda Schmidt <amandahigleyschmidt@gmail.com>
To: mwilson@co.slo.ca.us
Date: 12/03/2014 04:58 PM
Subject:

November 22, 2014

Murry Wilson
SLO County Dept. of Planning and Building 976, Osos Street, Room 200 San Luis Obispo, 93408 P66-railspur-comments@co.slo.ca.us

Dear Mr. Murry Wilson,

Thank you for adding my comments to the public record on the Phillips 66 Railspur Project.

I am a resident of Fair Oaks, California, and the proposed 80-car crude-oil train headed to the Santa Maria refinery 5 days a week will travel through the Sacramento region. I am concerned for a number of reasons.

SCA-01

First, operational activities associated with the Rail Spur Project would generate greenhouse gas emissions that exceed acceptable thresholds, which will contribute substantially to Climate Change. We should be abandoning all fossil fuels and focusing entirely on renewable energy, for the future of our children.

SCA-02

Second, I am very concerned about the health and safety risks of this project. Oil trains create toxic air pollution that increases risks in cancer, heart disease, and respiratory disease. I am worried about the health of my young children if this project goes forward.

SCA-03

Third, the risk of oil spills and the resulting environmental devastation are very high along certain parts of the rail line. All three train routes into California include identified "high hazard" rail sections according to Office of Spill Prevention and Response Map. California has many untrustworthy old bridges not built to carry 100 heavy tank cars, such as the Carquinas Bridge at Benicia. The bridges are only now scheduled to receive minimal inspections for safety, but there is no money for repairs or replacement. Also, the risk of earthquakes in this area is high, since this route runs right along a seismic fault line.

SCA-04

Fourth, as a frequent Amtrak traveler, I am concerned about major disruptions to passenger & freight traffic. Amtrak is already delayed frequently by freight trains, and this would greatly exacerbate the problem. Also, in other regions, food and grain crops have been delayed or dumped when railroads chose to deliver more lucrative loads of crude oil instead. The livelihood of farmers was destroyed for the profit of oil companies, railroads and refineries. This is simply unethical and unacceptable.

SCA-05

I urge you to reject the Phillips 66 Railspur Proposal. It is harmful to the health of California residents, contributes to Climate Change, risks destroying our environment by running crude oil along an unsafe rail line, and is detrimental to rail traffic and the livelihood of farmers.

SCA-06

Thank you for your attention to this important matter.

Sincerely,
Amanda Higley Schmidt
Fair Oaks, CA

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SCA-01	This comment introduces the signatory to the comment letter and therefore does not identify a specific environmental analysis or CEQA issue relative to the EIR and compliance with CEQA. No further response is required.
SCA-02	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, GHG and toxic pollutants would exceed the SLOCAPCD thresholds and would be a significant impact.
SCA-03	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, GHG and toxic pollutants would exceed the SLOCAPCD thresholds and would be a significant impact.
SCA-04	<p>In July 2010, Federal Railroad Administration (FRA) released a Bridge Safety Standards Final Rule requiring railroad track owners to adopt and follow specific procedures to protect the safety of their bridges and to strengthen federal oversight of railroad bridge programs. The Bridge Safety Standards Final Rule requires rail carriers to:</p> <ul style="list-style-type: none"> • Implement bridge management programs that include at minimum annual inspections of railroad bridges • Conduct special inspections if the weather or other conditions warrant such inspections • Maintain an inventory of all railroad bridges and know their safe load capacities • Maintain design documents and to document all repairs, modifications, and inspections of each bridge • Ensure bridge engineers, inspectors and supervisors must meet minimum qualifications • Make sure bridge inspections are conducted under the direct supervision of a designated railroad bridge inspector • Conduct internal audits of bridge management programs and inspections <p>49 CFR 237.71 requires railroad bridge owners to determine bridge load capacities as follows:</p> <p>(a) Each track owner shall determine the load capacity of each of its railroad bridges. The load capacity need not be the ultimate or maximum load capacity, but must be a safe load capacity.</p>

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	<p>(b) The load capacity of each bridge shall be documented in the track owner's bridge management program, together with the method by which the capacity was determined.</p> <p>(c) The determination of load capacity shall be made by a railroad bridge engineer using appropriate engineering methods and standards that are particularly applicable to railroad bridges.</p> <p>(d) Bridge load capacity may be determined from existing design and modification records of a bridge, provided that the bridge substantially conforms to its recorded configuration. Otherwise, the load capacity of a bridge shall be determined by measurement and calculation of the properties of its individual components, or other methods as determined by a railroad bridge engineer.</p> <p>(e) If a track owner has a group of bridges for which the load capacity has not already been determined, the owner shall schedule the evaluation of those bridges according to their relative priority, as established by a railroad bridge engineer. The initial determination of load capacity shall be completed no later than five years following the required date for adoption of the track owner's bridge management program in conformance with § 237.31.</p> <p>(f) Where a bridge inspection reveals that, in the determination of the railroad bridge engineer, the condition of a bridge or a bridge component might adversely affect the ability of the bridge to carry the traffic being operated, a new capacity shall be determined.</p> <p>(g) Bridge load capacity may be expressed in terms of numerical values related to a standard system of bridge loads, but shall in any case be stated in terms of weight and length of individual or combined cars and locomotives, for the use of transportation personnel.</p> <p>(h) Bridge load capacity may be expressed in terms of both normal and maximum load conditions. Operation of equipment that produces forces greater than the normal capacity shall be subject to any restrictions or conditions that may be prescribed by a railroad bridge engineer.</p> <p>The bridges along the proposed routes are currently rated to accommodate crude oil unit trains. ExxonMobil currently operates a unit train from San Ardo to Los Angeles following the same route as proposed by Phillips 66, including the Cuesta Grade and Stenner Creek Bridge. Plains All American pipeline also receives crude oil unit trains at their Kern County terminal that traverse much of the same routes that the proposed Phillips 66 unit trains would utilize.</p>
SCA-05	Federal law requires the railroads to transport all materials submitted for transport as long as they are properly packaged. The RDEIR discusses the impact of the proposed project on Amtrak service (see Section 4.12, Transportation and Circulation). The impacts to Amtrak service were found to

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	be less than significant (Class III).
SCA-06	These comments do not identify a specific environmental analysis or CEQA issue relative to the EIR and compliance with CEQA. The commenter's concerns about health, climate, hazards, traffic, agriculture, and other environmental impacts are included in the FEIR for the decision-makers' consideration as part of the County's deliberations on the proposed project.