From: Suzanne and Henry Schwake <schwakes@hotmail.com>
To: "p66-railspur-comments@co.slo.ca.us"
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Date: 11/23/2014 11:05 AM
Subject: Oil Trains Thru SLO County

Attention: Mr. Murry Wilson, SLO County Planning Department

As a fairly new resident of the SLO county, I was appaled to hear of the possible approval of numerous oil trains rolling into, thru and and out of the county. These trains will not be moving primarily through heavily industrialized areas. Rather thru residential, educational, commercial and medical areas of the county as well as along some scenic byways along tracks, bridges and steep grades not intended to carry such dangerous loads. As an added danger, I understand the plan is to use what are now considered to be inadequate types of tank cars to carry volatile oils. What a time bomb waiting to explode and burn in our midst. SCH-01

Additionally all of the added pollution from railroad engines, trucks, and unloading equipment as well as the increased noise pollution from so many trains would turn this county into a much less desirable area to live in, conduct business in or visit as many tourists do. I suspect the GDP of the county would take quite a slip as tourism and business declined. SCH-02

Could you please respond to me with the list of advantages to the County to approve these large oil trains to pass through our midst. Could there possibly be enough advantages to off set the above terrible disadvantages to our communities safety, beauty and existing tourism and commerce ? SCH-03

Sincerely,

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Responses to Henry Schwake Comments

SCH-01	A Quantitative Risk Analysis (QRA) was conducted as part of the RDEIR and is documented in the Hazards and Hazardous Materials Section (see Section 4.7 and Appendix H). The rail routes were divided up into distinct segments to account for differing population levels along the rail routes. Each segment was assigned a population density reflecting the unique populations along the rail route. Segments where facilities and/or events might attract temporary high population levels were assigned a population that reflected the larger temporary population, and did not correct for seasonal or diurnal variation, thus slightly overestimating the risk for the segment. The fact that every possible landmark along the proposed rail routes is not explicitly mentioned does not mean that it was omitted. The population assigned for each segment characterizes the potential residential, commercial, industrial, and venue population that is, or could be temporarily, present along the segment. 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: • 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 49 CFR 237.71 requires railroad bridge owners to determine bridge load capacities as follows: (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. (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.

	(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. (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. (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. (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. (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. (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. 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. In San Luis Obispo County, the Cuesta Grade represents an area where a runaway train could occur. A runaway train coming down the Cuesta Grade could result in spills of crude oil and associated fires. The Rail Spur Project would use two additional locomotives (for a total of five locomotives) on the crude oil unit train for crossing the Cuesta Grade. These two additional locomotives would be added to the train at Santa Margarita and removed from the train in the City of San Luis Obispo once the train had crossed the Cuesta Grade. These additional locomotives would help to assure that the train can

	safely traverse the Cuesta Grade. 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.
SCH-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.
SCH-03	This comment is just a statement that the State Clearinghouse had submitted the RDEIR to various state agencies, and they had received no comments back from these agencies. No further response is required.