

From: Jeffrey Thompson <jthompson178@cox.net>
To: p66-railspur-comments@co.slo.ca.us
Date: 11/17/2014 06:11 PM
Subject: Please APPROVE Oil Train Expansion

Dear San Luis Obispo County Commissioners and Supervisors,

I am writing to strongly urge you to APPROVE the proposed oil-by-rail project at the Phillips 66 Santa Maria Refinery. Bringing crude oil from our friendly northern neighbors (Canada) will dramatically improve our country's strategic status, helping eliminate any need for us to purchase crude oil from countries that sponsor terrorism.

THJ-01

I am strongly IN SUPPORT of this project for several reasons:

1. Emergency responders in along the route are prepared for spills, in the unlikely event that one should occur. The EIR cites accurate, relevant rail accident rates. These rates are far below any other form of bulk liquid transportation (other than pipeline), and document that the risk of a significant spill is remote.

THJ-02

2. The EIR's worst-case scenario estimates a spill of 180,000 gallons, or roughly six tank cars of crude. Although tank car trains are often 10 to 20 times longer than six cars, an actual derailment and spillage would likely involve no more than 6 cars, and usually far less. In other words, a realistic worst case scenario is no more than 6 cars. While a worst case scenario would be a tragedy, it is something that can be effectively dealt with.

THJ-03

3. The emissions that will accompany this project do not increase risk to public health. In its latest environmental review Phillips 66 admits that its proposed oil train facility will create "significant and unavoidable" levels of air pollution along the rail route. However, the levels are not high enough to have any significant impact on public health. The fundamental principle of toxicology is "the dose is the poison" which means that low levels of chemicals (which are harmful at high levels) are not dangerous.

THJ-04

4. Some would argue that this project will have a negative impact on the climate, due to carbon dioxide emissions. Assuming there is proven science linking the two, the crude oil will be processed and used somewhere. There is no reason that it cannot be processed in California, thereby providing good jobs and additional tax revenue to the County and State.

THJ-05

For all these reasons, I urge the San Luis Obispo County Planning Commission and Board of Supervisors to APPROVE the Phillips 66 proposed rail spur.

THJ-06

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US

Responses to Jeffrey Thompson Comments

THJ-01	These comments do not identify a specific environmental analysis or CEQA issue relative to the EIR and compliance with CEQA. The comment about approving the project for strategic reasons is included in the FEIR for the decision-makers' consideration as part of the County's deliberations on the proposed project.
THJ-02	This comment does not identify a specific environmental analysis or CEQA issue relative to the EIR and compliance with CEQA. The commenter's support of the safety and environmental methodologies and findings in the FEIR have been included for the decision-makers' consideration as part of the County's deliberations on the proposed project.
THJ-03	This comment does not identify a specific environmental analysis or CEQA issue relative to the EIR and compliance with CEQA. The commenter's support of the safety and environmental methodologies and findings in the FEIR have been included for the decision-makers' consideration as part of the County's deliberations on the proposed project.
THJ-04	Emissions of toxic pollutants contribute to cancer risks and are generally more local impacts. Emission credits are not proposed for these impacts. The use of DPM credits was removed from the final EIR. The mitigation measures for toxic impacts are to utilize Tier 4 locomotives, which are substantially cleaner than most locomotive currently operating and Tier 4 locomotives are available in 2015. However, this mitigation measure may be preempted by Federal requirements. Emissions of toxic materials are found to be significant and unavoidable. See Appendix B.2. However, along the mainline, impacts would be less than significant for areas where trains are consistently traveling more than 30 mph (most of the mainline route).
THJ-05	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.

Responses to Jeffrey Thompson Comments

	<p>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.</p>
THJ-06	<p>This comment does not identify a specific environmental analysis or CEQA issue relative to the EIR and compliance with CEQA. The comment just states support for the project. No further response is required.</p>