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Date: 11/18/2014 05:12 PM
Subject: Comments

Add to Air Quality Impacts

There is a need to factor in all of the GHG emissions caused by vehicles waiting for the train to pass at all at-grade crossings along the entire right-of-way.

WOD-01

Add to Hazards and Hazardous Materials and Public Services and Utilities

Due to Jammed intersections at at-grade crossings there will be more delays for emergency responders creating more damage to life and property.

WOD-02

Transportation and Circulation

A minimum of effort was spent discussing the impacts of passing trains on at-grade crossings. LOS and total delay times need to be determined for individual crossings along the entire route. The impacts related to interrupted signal light timing, delayed transit schedules and driver frustration need to be discussed.

WOD-03

An Observation

If there is a mitigation for a class 1 impact and Federal regulations do not allow this mitigation then the EIR should not be approved.

WOD-04

Thank you,

Dan Woodson

Responses to Dan Woodson Comments

WOD-01	<p>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.</p> <p>The EIR concludes that emissions of criteria, GHG and toxic pollutants would exceed the SLOCAPCD thresholds and would be a significant impact.</p> <p>Increased wait times for vehicles at crossings would be minimal for 5 trains per week and would not contribute substantially to the GHG emissions associated with the project. Assuming 88 at grade vehicle crossing along the route within SLOC (as per DOT database on crossings) with an estimated average of 3 cars (averaged over a 24 hour period) and a wait time of about 2 minutes would produce about 22 MTCO_{2e} per year for 500 train one way trips due to idling time of cars waiting for the train. This is less than 0.7 % of the GHG emissions associated with the project, well within the error of the emissions estimates in the EIR.</p>
WOD-02	<p>Given the frequency of train trips (a little more than one per day for deliveries and return trips), potential delays at railroad crossings would be minimal and rarely impact emergency responder response times.</p>
WOD-03	<p>The estimated delay for at-grade crossing for a unit train would be about 2.2 to 3.2 minutes depending upon the speed of the train. Depending upon the location of the at-grade crossing and the time the crude oil train made the crossing it could affect delay times at an intersection. The greatest chance for this would be if a train crossed the at-grade crossing during the AM or PM peak hours. There is a 12 percent chance that a train would cross an intersection during the AM or PM peak hours. However, given that under normal operations, only one train would cross an at-grade crossing during the AM and PM peak hours, it would not affect the average delay time for the intersection over the peak three hour period.</p> <p>Given the minimal number of trains per day that would impact at-grade crossing, the analysis was sufficient to determine the level of impact. The type of analysis discussed in the comment is typically done for commuter rail project that can have multiple rail trains cross an intersection in a given peak hour. These types of project can result in gate closing times of as much as 13 minutes in each hour, which can have a significant impact on intersection LOS and total delay time.</p>
WOD-04	<p>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 Class I impacts and Federal preemption, have been included in the FEIR for the decision-makers' consideration as part of the County's deliberations on the proposed project.</p>

Responses to Dan Woodson Comments