From: "kaforrest@earthlink.net" <kaforrest@earthlink.net>
To: p66-railspur-comments@co.slo.ca.us
Date: 11/18/2014 12:03 PM
Subject: Reject the Phillips 66 oil train proposal

Mr. Murry Wilson
San Luis Obispo County Planning Department

Dear San Luis Obispo Supervisors and Planning Department:

I am concerned about the proposed oil-by-rail project at the Phillips 66 Santa Maria Refinery. The Phillips 66 project puts communities all along the course of those rail lines at risk. This project presents a significant risk to my densely-settled county and to many other California communities.

The train route goes down the east side of San Francisco Bay and through a major urban complex of over a million people in Santa Clara County, the heart of Silicon Valley.

We have seen multiple news reports of train accidents with spills of crude oil, train crashes, and fires. Your EIR should include recent data from the US and Canada, both of which have experienced increased crude-by-rail incidents as more oil is being shipped by train. Old and unsafe tank cars are being widely used and have not yet been replaced. KAF-01

A spill of hundreds of thousands or even millions of gallons of crude oil would not only threaten public safety. It would likely contaminate the underground aquifer upon which many local cities depend for their water supply. This is the last thing we need in a time of drought, and with predictions of continuing drought in the future. KAF-02

Toxic air emissions leaking out of the tank cars would increase the already-significant levels of air pollution. The train route runs through a large valley area with mountains on both side that trap air pollution. KAF-03

Canadian tar sands are among the most carbon intensive and toxic on earth.
Thwarted by opposition to transmission of tar sands via pipeline, oil companies like Phillips 66 are turning to shipping tar sands crude by rail.
Communities along pipelines have experienced first hand what spills of tar sands crude can mean. We do not want to have to face such spills n our area. KAF-04

I ask that the San Luis Obispo County Planning Commission and Board of Supervisors reject the Phillips 66 proposed rail spur. This project creates significant, unavoidable, and unnecessary risks for our communities and our climate. KAF-05

Respectfully yours,

KAF-01	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.
KAF-02	Potential worst-case water quality impacts related to a rail accident has been addressed in Impact WR.3. Individual waterways that could be affected are shown on Figures 4.13-4 through 4.13-9 and in Tables 4.13-1 and 4.13-2. Water quality impacts from a spill along the mainline rail were concluded to be significant and unavoidable (Class I).
KAF-03	The RDEIR addresses the potential impacts and recommends mitigation measures for the proposed Project consistent with the requirements of CEQA. Section 4.0 presents the environmental analysis for the CEQA mandated issue areas; air quality, including impacts from importation and processing of tar sands are discussed in Section 4.3 (Air Quality and Greenhouse Gases). The EIR indicates that criteria pollutant emissions from locomotives along the mainline travel routes would be significant. Air emissions from tank car fugitive emissions are nominal, totaling only about 0.02 lbs/round trip within SLO County. Rails cars would not be opened during transit. Emissions associated with unloading of the tank cars, including pumps, pressure relief valves, manifolds, connections, etc, were all included in the EIR and listed in detail in the Air Quality Appendix. Emissions associated with unloading would not occur during transit.
KAF-04	The RDEIR states that GHG emissions associated with crude oil transportation by rail would produce significant and unavoidable impacts. Emissions can be offset through the use of emissions offsets, as are available from a number of different sources for GHG. However, as indicated in (Air Quality and Greenhouse Gases) of the RDEIR, it is uncertain if Air Districts could require GHG offsets due to Federal preemption and the impacts associated with the GHG emissions would remain significant and unavoidable. 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. Section 4.7 (Hazards and Hazardous Materials) and Section 4.4 (Biological Resources) of the RDEIR also indicates that impacts from spills would be significant, for both biological impacts and to communities.
KAF-05	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 hazards and climate are included in the FEIR for the decision-makers' consideration as part of the County's deliberations on the proposed project.