Initial Study Summary – Environmental Checklist

PLANNING & BUILDING DEPARTMENT • COUNTY OF SAN LUIS OBISPO
976 OSOS STREET • ROOM 200 • SAN LUIS OBISPO • CALIFORNIA 93408 • (805) 781-5600

(ver 5.1)Using Form

Project Title & No. **Phillips 66 Santa Maria Refinery Rail Project Development Plan /Coastal Development Permit ED12-201 (DRC2012-00095)**

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The proposed project could have a "Potentially Significant Impact" for at least one of the environmental factors checked below. Please refer to the attached pages for discussion on mitigation measures or project revisions to either reduce these impacts to less than significant levels or require further study.

☒ Aesthetics	☒ Geology and Soils	☒ Recreation
☒ Agricultural Resources	☒ Hazards/Hazardous Materials	☒ Transportation/Circulation
☒ Air Quality	☒ Noise	☒ Wastewater
☒ Biological Resources	☐ Population/Housing	☒ Water /Hydrology
☒ Cultural Resources	☒ Public Services/Utilities	☒ Land Use

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation, the Environmental Coordinator finds that:

☐ The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ The proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Emily Creel			June 28, 2013
Prepared by (Print)	Signature		Date
Murry Wilson		Ellen Carroll, Environmental Coordinator	July 8, 2013
Reviewed by (Print)	Signature	(for)	Date

Project Environmental Analysis

The County's environmental review process incorporates all of the requirements for completing the Initial Study as required by the California Environmental Quality Act (CEQA) and the CEQA Guidelines. The Initial Study includes staff's on-site inspection of the project site and surroundings and a detailed review of the information in the file for the project. In addition, available background information is reviewed for each project. Relevant information regarding soil types and characteristics, geologic information, significant vegetation and/or wildlife resources, water availability, wastewater disposal services, existing land uses and surrounding land use categories and other information relevant to the environmental review process are evaluated for each project. Exhibit A includes the references used, as well as the agencies or groups that were contacted as a part of the Initial Study. The County Planning Department uses the checklist to summarize the results of the research accomplished during the initial environmental review of the project.

Persons, agencies or organizations interested in obtaining more information regarding the environmental review process for a project should contact the County of San Luis Obispo Current Planning Division, 976 Osos Street, Rm. 200, San Luis Obispo, CA, 93408-2040 or call (805) 781-5600.

A. PROJECT

DESCRIPTION: The proposed project is comprised of two distinct components: the proposed Rail Spur Extension project and a separate and distinct possible provision of vertical Coastal Access through the site (collectively referred to as "the project"). The two project components are summarized below:

Rail Spur Extension. The proposed rail spur extension includes a request by Phillips 66 Company for a Development Plan / Coastal Development Permit to allow for the extension of an existing rail spur at the Santa Maria Refinery and construction of a railcar off-loading facility, above-ground conveyance pipeline, restroom facility, and an unpaved emergency vehicle access road from the end of the proposed rail spur to State Route 1. Development of the extension would include approximately 1.3 miles of new rail (with a construction width of 270 feet), 0.7 miles of new above-ground pipeline, and a 0.7-mile long emergency access road. The rail spur extension would include up to five parallel ladder tracks, each long enough to accommodate a train of approximately 80 tank cars, with associated locomotives and supporting cars. The project would also include work within the existing refinery, connecting and upgrading existing infrastructure. The extension is intended to allow the Santa Maria Refinery to access a wider range of competitively priced crude oil.

The total area of disturbance would be approximately 48.9 acres; however, almost half of the proposed disturbance would occur within the existing refinery or coke storage areas, with the remaining portion being constructed in an area currently used for grazing and other open/undisturbed areas within the existing refinery area.

The County has determined that an EIR should be prepared for the project, based on the potential for the project to result in significant, adverse impacts on the environment, as discussed below. This project component will be analyzed on a project-specific basis in the EIR.

Coastal Access. The project also includes a conceptual plan for provision of vertical Coastal Access through the project site to the Oceano Dunes State Vehicular Recreation Area. As part of a separate permit issued for the project site, initiated by Phillips 66 in 2008 and approved by the County Board of Supervisors in February 2013, Phillips 66 may be required to construct vertical public access from State Route 1 to their western property line to comply with the coastal access provisions of the County's Coastal Zone Land Use Ordinance (CZLUO). Although the provision of coastal access is not integral to, and has independent utility from, the Rail Spur Extension project, it is appropriate to include an analysis of the potential

environmental impacts of the accessway because of the shared environmental setting and regulatory framework of the two adjoining components. The size and alignment of the coastal accessway, as well as the appropriateness of access at this location based on the environmental setting, public safety concerns, and current land uses in the area, is currently under consideration by the California Coastal Commission.

The Coastal Access component of the project will be analyzed at a programmatic level in a separate section of the EIR to help inform the decision makers on potential impacts associated with development of a public accessway at this location.

The project is located in the southwestern corner of San Luis Obispo County, approximately 1 mile southwest of State Route 1, and approximately 3.5 miles west of the community of Nipomo, in the South County Coastal planning area. The rail spur extension would be located entirely on the Phillips 66 property lying east of the Union Pacific Railroad and zoned for industrial use, at the site of the existing Santa Maria Refinery. The proposed coastal access trail would cross this portion of the project site and also extend into open space lands west of the railroad.

A detailed project description has been included as Appendix A and the project location and site plans are shown in the figures attached as Appendix B. Appendix C includes referral responses received from responsible agencies and interested parties that previously reviewed the project. Their responses have also been incorporated into the analysis below.

ASSESSOR PARCEL NUMBER(S): 091-141-062, 091-192-034, 092-391-020, 092-391-021, 092-391-034, 092-401-005, 092-401-011, 092-401-013, 092-411-002, and 092-411-005

Latitude: 35 degrees 02' 18" N Longitude: 120 degrees 34' 56" W **SUPERVISORIAL DISTRICT #** 4

B. EXISTING SETTING

PLANNING AREA: South County (Coastal), Rural

LAND USE CATEGORY: Industrial and Open Space

COMBINING DESIGNATION(S): Coastal Appealable Zone, Flood Hazard, Sensitive Resource Area

TOPOGRAPHY: Nearly level to gently rolling

VEGETATION: Coastal scrub, Grasses, Wetland

PARCEL SIZE: ~1650 acres total

EXISTING USES: Industrial uses, agricultural uses, and undeveloped land

SURROUNDING LAND USE CATEGORIES AND USES:

North: Residential Suburban, Agriculture; single-family residence(s) agricultural uses heavy commercial/light industrial	*East:* Recreation, Agriculture; golf course, undeveloped lands, agricultural uses
South: Agriculture; agricultural uses	*West:* Recreation; undeveloped, Pismo Dunes State Vehicular Recreation Area

C. ENVIRONMENTAL ANALYSIS

During the Initial Study process, several issues were identified as having potentially significant environmental effects (see following Initial Study).

1. AESTHETICS

Will the project:

	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Create an aesthetically incompatible site open to public view?	☒	☐	☐	☐
b) Introduce a use within a scenic view open to public view?	☒	☐	☐	☐
c) Change the visual character of an area?	☒	☐	☐	☐
d) Create glare or night lighting, which may affect surrounding areas?	☒	☐	☐	☐
e) Impact unique geological or physical features?	☒	☐	☐	☐
f) Other: _____	☐	☐	☐	☐

Setting. The proposed project is located in unincorporated San Luis Obispo County, in the predominantly rural area west of the community of Nipomo (refer to the figures located in Appendix B for a project location map). The eastern portion of the project site is level to gently rolling (0 to 10 percent slopes), and predominantly consists of degraded central dune scrub habitat and grazed grasslands. The Union Pacific Railroad bisects the project site, and open space uses on the project site, off-road activities associated with the Oceano dunes, and the beach are located west of the rail line. This area includes more moderate slopes and is comprised of high quality central dune scrub vegetation supporting a variety of sensitive plant species. This area is within the Sensitive Resource Area (SRA) combining designation and is also a designated Environmentally Sensitive Habitat Area (ESHA).

Existing on-site uses include industrial activities associated with the Santa Maria Refinery and cattle grazing in the eastern portion of the site, and undeveloped open space uses west of the railroad. An existing unimproved service road provides access for maintenance of the refinery's ocean outfall structure (associated with the on-site wastewater treatment facility) within the undeveloped open space area west of the railroad. Surrounding land uses include intensive agricultural production to the north and south, recreation and open space to the west, and more urbanized residential and light industrial uses within the communities of Nipomo and Callendar-Garrett to the east and northeast.

The project site is visible from sporadic locations along State Route 1 and other local roads. However, existing topography, structures and roadside vegetation largely obstruct public views of the Santa Maria Refinery.

Impact. Rail Spur Extension**.** The proposed rail spur extension would result in the construction of approximately 2.7 miles of new rail, pipeline and roadways within the project site. The project would introduce new industrial features (tracks, off-loading facilities, pipelines, and rail cars) on areas of the property that are currently grazed. Rail cars utilizing the new section of rail and other infrastructure would be visible from over a mile away, including at various locations along State Route 1. Preliminary analysis indicates that the new infrastructure and rail cars would not be visible from any existing residences. The off-loading activities and security lighting also have the potential to generate

sources of night lighting or glare, which may be visible from surrounding areas, impacting views of the night sky at this rural location.

Coastal Access. The vertical coastal accessway through the project site would likely follow existing roads on the refinery property before crossing the railroad into the open space dune areas and existing unimproved access road. The conceptual design of the accessway provided by the applicant includes an approximately 1.5-mile long and 30-foot wide paved pedestrian and bicycle path. The path would rise in elevation with the dune topography and has the potential to be visible from multiple public vantage points in the surrounding area. This project component would extend through a highly scenic and undisturbed area, potentially creating an aesthetically incompatible use at the project site. The Guadalupe-Nipomo Dune Complex is one of the largest remaining dune systems in the state. Development of a paved 30-foot-wide path at this location may result in a significant impact to this unique geologic feature.

Mitigation/Conclusion. The project could potentially result in significant adverse impacts to the visual character of the area by introducing visible industrial uses into an area that has historically been grazed and creating a paved path across the open space dune area. Aesthetic and visual resource impacts resulting from the project shall be analyzed in the EIR to determine whether public views from surrounding public areas, including State Route 1, Oso Flaco Lake Road, and the Oceano Dunes State Recreational Vehicle Area, would be adversely impacted by the proposed project activities.

2. AGRICULTURAL RESOURCES ***Will the project:***	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
a) Convert prime agricultural land, per NRCS soil classification, to non-agricultural use?	☐	☐	☒	☐
b) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use?	☒	☐	☐	☐
c) Impair agricultural use of other property or result in conversion to other uses?	☒	☐	☐	☐
d) Conflict with existing zoning for agricultural use, or Williamson Act program?	☒	☐	☐	☐
e) Other: _____	☐	☐	☐	☐

Setting. Project Elements. The following area-specific elements relate to the property's importance for agricultural production:

Land Use Category: Industrial, Open Space

State Classification: Not prime farmland

Historic/Existing Commercial Crops: None

In Agricultural Preserve? No

Under Williamson Act contract? No

The project area currently supports grazing activities and is bordered on the northeast, south, and southwest by intensive agricultural uses that are under Williamson Act contracts. The Natural Resource Conservation Service (NRCS) surveys soils and assigns a soil capability classification that is used to determine whether the soil is a prime or non-prime agricultural soil.

On-site soils are designated as Farmland of Local Potential and Other Land by NRCS soil classifications. The soil type(s) at the property site include: dune land (comprising approximately 65% of the total project site), Oceano sand, 0 to 9 percent slopes (29%), Oceano sand, 9 to 30 percent slopes (4%), and Camarillo sandy loam, Psamments and Fluvents, and Xerorthents, escarpment (1% or less each).

Dune land, which encompasses the majority of the project site is not well suited for agricultural uses. However, other on-site soils are designated as Prime Farmland, Farmland of Statewide Importance, Other Productive Soils, or Highly Productive Rangeland Soils by the County's Conservation and Open Space Element (COSE).

The conversion of prime agriculture lands to non-agricultural uses is a concern within the county and across the state. The California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) tracks farmland conversion throughout California.

Impact. Rail Spur Extension. Construction of the rail spur extension and associated infrastructure would directly convert soils designated by the COSE as Farmland of Statewide Importance to non-agricultural uses. It would also result in the conversion of grazing lands to industrial uses, though grazing activities would likely continue on the remainder of the site. The increase in industrial infrastructure at the project site could also result in indirect impacts to adjacent agricultural activities due to the introduction of incompatible land uses, increased traffic, air pollutants, potential for hazardous materials spills, etc.

Coastal Access. The potential coastal accessway would likely be located along existing roads or in sand dune areas generally unsuited to agricultural uses. However, this project component would bring increased pedestrian and bicycle traffic within closer proximity to intensive production agriculture on adjacent properties (approximately 700 feet). Recreational users who stray off of the designated path could impact surrounding agricultural resources in the project vicinity.

Mitigation/Conclusion. Although the project site predominantly supports industrial and open space uses, there are also grazing activities on-site and portions of the area contain soils suited to agricultural production. The proposed developments are consistent with existing uses, but would reduce the amount of land available for grazing activities and would directly convert potentially productive soils to non-agricultural uses, potentially resulting in a significant impact. Increased industrial development and traffic at the project location could also result in adverse effects to intensive agricultural operations on adjacent properties. Potential impacts to agricultural resources resulting from the project shall be analyzed in the EIR to determine the extent of potential effects. The analysis shall include consultation with the County Agriculture Department to assist in identifying impacts and any necessary mitigation measures.

3. AIR QUALITY

Will the project:	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
a) Violate any state or federal ambient air quality standard, or exceed air quality emission thresholds as established by County Air Pollution Control District?	☒	☐	☐	☐
b) Expose any sensitive receptor to substantial air pollutant concentrations?	☒	☐	☐	☐
c) Create or subject individuals to objectionable odors?	☒	☐	☐	☐

3. AIR QUALITY

Will the project:	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
d) Be inconsistent with the District's Clean Air Plan?	☒	☐	☐	☐
e) Result in a cumulatively considerable net increase of any criteria pollutant either considered in non-attainment under applicable state or federal ambient air quality standards that are due to increased energy use or traffic generation, or intensified land use change?	☒	☐	☐	☐
GREENHOUSE GASES				
f) ***Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***	☒	☐	☐	☐
g) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐
h) Other: _____	☐	☐	☐	☐

Setting. The San Luis Obispo County Air Pollution Control District (SLOAPCD) has developed and updated their CEQA Air Quality Handbook (2012) to evaluate project specific impacts and help determine if air quality mitigation measures are needed, or if potentially significant impacts could result. To evaluate long-term emissions, cumulative effects, and establish countywide programs to reach acceptable air quality levels, a Clean Air Plan has been adopted (prepared by APCD).

Western San Luis Obispo County is currently in non-attainment for ozone (O_3) and respirable particulate matter (PM_{10}). The project site is within close proximity (1 mile) of various sensitive receptors, including multiple residences and recreational areas along the beach and dunes.

The project is located in an area that has historically been subject to poor air quality conditions due to high northwesterly winds and off-road vehicle use blowing sand and dust across the dunes (SLOAPCD, *Oceano Dunes: Air Quality Issues & Solutions*, CAPCOA Engineering Managers Symposium, June 4, 2013). While the PM_{10} standard is rarely exceeded elsewhere in the County, the Nipomo Mesa has regularly experienced state and federal standard exceedances, including over 60 state standard exceedances per year. The SLOAPCD has undergone significant air quality monitoring and analysis in the project vicinity and has concluded that the refinery coke piles and industrial operations are not a significant contributing source of the area's high PM_{10} concentrations (SLOAPCD, June 4, 2013). Airborne particulate matter can cause significant health impacts, including respiratory problems, heart attacks and other cardiac conditions, impaired lung development in newborn children, and premature death.

Greenhouse Gas (GHG) Emissions are gases that trap heat in the earth's atmosphere causing an increase in the earth's average surface temperature. This is commonly referred to as global warming. The rise in global temperature is associated with long-term changes in precipitation, temperature,

wind patterns, and other elements of the earth's climate system. This is also known as climate change. These changes are now thought to be broadly attributed to GHG emissions, particularly those emissions that result from the human production and use of fossil fuels.

The passage of AB32, the California Global Warming Solutions Act (2006), recognized the need to reduce GHG emissions and set the greenhouse gas emissions reduction goal for the State of California into law. The law required that by 2020, State emissions must be reduced to 1990 levels. This is to be accomplished by reducing greenhouse gas emissions from significant sources via regulation, market mechanisms, and other actions. Subsequent legislation (e.g., SB97-Greenhouse Gas Emissions bill) directed the California Air Resources Board (CARB) to develop statewide thresholds.

In March 2012, the SLOAPCD approved thresholds for GHG emission impacts, and these thresholds have been incorporated the APCD's CEQA Air Quality Handbook. A bright-line numerical value threshold of 10,000 MT CO2e/yr was adopted for stationary source (industrial) projects.

It should be noted that projects that generate less than the above mentioned thresholds will also participate in emission reductions because air emissions, including GHGs, are under the purview of the California Air Resources Board (or other regulatory agencies) and will be "regulated" either by CARB, the Federal Government, or other entities. For example, new vehicles will be subject to increased fuel economy standards and emission reductions, large and small appliances will be subject to more strict emissions standards, and energy delivered to consumers will increasingly come from renewable sources. Other programs that are intended to reduce the overall GHG emissions include Low Carbon Fuel Standards, Renewable Portfolio standards and the Clean Car standards. As a result, even the emissions that result from projects that produce fewer emissions than the threshold will be subject to emission reductions.

Under CEQA, an individual project's GHG emissions will generally not result in direct significant impacts. This is because the climate change issue is global in nature. However, an individual project could be found to contribute to a potentially significant cumulative impact. Projects that have GHG emissions above the noted thresholds may be considered cumulatively considerable and require mitigation.

Impact. Rail Spur Extension. As proposed, the project will result in the disturbance of approximately 48.9 acres. This will result in the creation of construction dust, construction emissions, as well as short- and long-term vehicle emissions in an area historically subject to poor air quality conditions. The project is located in an area known to contain naturally occurring asbestos (NOA), a toxic air contaminant. Site disturbance has the potential to disturb NOA in rocks underlying the project site. Demolition of existing rail facilities may also encounter asbestos containing materials (ACM), which would trigger regulations regarding the appropriate handling, demolition and disposal of ACM.

Increased operational activities at the site will generate long-term operational emissions, which may exceed operational thresholds triggering mitigation. Operational emission sources include locomotives transporting crude oil in rail tankers along the new spur, unloading of crude oil at the facility, and the use of facility equipment (pumps, compressors, and tank trucks). The project is within close proximity (1 mile) of multiple sensitive receptors, including residential areas that are sensitive to air pollution. Project-related emissions, particularly of diesel particulate matter, could pose health and cancer risks to nearby sensitive receptors. The increased industrial operations at the site could constitute new sources of odors and toxic air contaminants, and dust complaints could result in a violation of the APCD's nuisance rules, a potentially significant air quality impact.

This project is a heavy industrial use, which would result in the generation of GHGs (particularly CO_2 emissions from internal combustion engines). Operation of the proposed project could generate more than the Bright-Line Threshold of 1,150 metric tons of GHG emissions. The electricity sector is the number one contributor of U.S. greenhouse gas emissions. The project proposes to divert some of the fuel gas currently used for electricity generation to steam production to supply heat for the

proposed rail spur; therefore, additional electricity will need to be purchased from the grid resulting in additional indirect generation of GHGs. Operational use of unpaved roads and parking areas would also generate fugitive dust.

Coastal Access. Development of the paved coastal accessway would result in the creation of construction dust, construction emissions, and short-term vehicle emissions in an area subject to high wind erosion and poor air quality conditions. Operational emissions would result from additional vehicle trips associated with accessing the new accessway at this location and any necessary routine maintenance activities.

Mitigation/Conclusion. The project site is situated in an area with considerable existing air quality concerns, thus necessitating a comprehensive review of potential short- and long-term air quality effects. Air quality emissions, including GHGs, associated with the project shall be analyzed in the EIR to determine the extent of any resulting impacts. The analysis should, at minimum, identify and evaluate potential emission sources and compare anticipated emissions of criteria air pollutants, toxic air contaminants, greenhouse gases, and odor-causing compounds against applicable thresholds. The County is currently non-attainment for PM_{10}, therefore PM mitigation measures shall be included to reduce impacts to the greatest extent feasible. A geologic evaluation to determine the presence of NOA shall be developed and a screening health risk assessment shall be completed to assess the potential health risks associated with project-related emissions. Indirect impacts associated with additional electrical demands shall also be analyzed. This analysis will require close coordination with the SLOAPCD.

4. BIOLOGICAL RESOURCES *Will the project:*	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
a) Result in a loss of unique or special status species* or their habitats?	☒	☐	☐	☐
b) Reduce the extent, diversity or quality of native or other important vegetation?	☒	☐	☐	☐
c) Impact wetland or riparian habitat?	☐	☐	☒	☐
d) Interfere with the movement of resident or migratory fish or wildlife species, or factors, which could hinder the normal activities of wildlife?	☒	☐	☐	☐
e) Conflict with any regional plans or policies to protect sensitive species, or regulations of the California Department of Fish & Wildlife or U.S. Fish & Wildlife Service?	☒	☐	☐	☐
f) Other: _____	☐	☐	☐	☐

*** Species – as defined in Section15380 of the CEQA Guidelines, which includes all plant and wildlife species that fall under the category of rare, threatened or endangered, as described in this section.**

Setting. The following are existing elements on or near the proposed project relating to potential biological concerns:

On-site Vegetation: Central Dune Scrub with varying degrees of disturbance

Name and distance from blue line creek(s): un-named blue line creek approximately 0.5 mile north and un-named tributary to Oso Flaco Creek approximately 0.4 mile south of the project site

Habitat(s): Central Dune Scrub, Non-native Veldt Grassland, Arroyo Willow Scrub

Site's tree canopy coverage: Less than 5%

The Natural Diversity Database (or other biological references) identified numerous plant and wildlife species potentially existing within approximately one mile of the proposed project. Those wildlife species considered likely to be present at the project site (suitable habitat is present) include: California red-legged frog (*Rana draytonii*), western spadefoot toad (*Spea hammondii*), Bell's sage sparrow (*Amphispiza belli*), Pacific pond turtle (*Actinemys marmorata*), coast horned lizard (*Phrynosoma coronatum*), silvery legless lizard (*Anniella pulchra* subsp. *pulchra*), western burrowing owl (*Athene cunicularia*), Loggerhead shrike (*Lanius ludovicianus*), northern harrier (*Circus cyaneus*), white-tailed kite (*Elanus leucurus*), Cooper's hawk (*Accipiter cooperii*), American badger (*Taxidea taxus*), and monarch butterfly (*Danaus plexippus*).

Plant species with the potential to occur at the project site (suitable habitat present) include: aphanisma (*Aphanisma blitoides*), Davidson's saltscale (*Atriplex serenana* var. *davidsonii*), San Luis Obispo sedge (*Carex obispoensis*), coastal goosefoot (*Chenopodium littoreum*), straight-awned spineflower (*Chorizanthe rectispina*), surf thistle (*Cirsium rhothophilum*), Pismo clarkia (*Clarkia speciosa* subsp. *immaculata*), Seaside bird's-beak (*Cordylanthus rigidus* subsp. *littoralis*), Gaviota tarplant (*Deinandra increscens* subsp. *villosa*), dune larkspur (*Delphinium parryi* subsp. *blochmaniae*), beach spectacle pod (*Dithyrea maritima*), mouse-gray dudlea (*Dudleya abramsii* subsp. *murina*), Blochman's leafy daisy (*Erigeron blochmaniae*), Saint's daisy (*Erigeron sanctarum*), Suffrutescent wallflower (*Erysimum suffrutescens*), mesa horkelia (*Horkelia cuneata* subsp. *puberula*), Kellogg's horkelia (*Horkelia cuneata* subsp. *sericea*), pale-yellow layia (*Layia heterotricha*), Nipomo Mesa Lupine (*Lupinus nipomoensis*), San Luis Obispo manardella (*Monardella frutescens*), crisp monardella (*Monardella undulata* subsp. *crispa*), California spineflower (*Mucronea californica*), coast wooly-heads (*Nemacaulis denudata* var. *denudata*), short-lobed broomrape (*Orobanche parishii* subsp. *brachyloba*), sand almond (*Prunus fasciculate* var. *punctata*), black-flowered figwort (*Scrophularia atrata*), Rayless ragwort (*Senecio aphanactis*), Blochman's groundsel (*Senecio blochmaniae*), and San Bernardino aster (*Symphyotrichum defoliatum*).

Surveys at the project site identified the presence of seven sensitive wildlife species observed in the project vicinity: Cooper's hawk, Bell's sage sparrow, western burrowing owl, Ferruginous hawk, northern harrier, Loggerhead shrike, and monarch butterfly. Other sensitive wildlife species are expected to occur or periodically occur in the project vicinity though they were not observed during site surveys, including coast horned lizard, silvery legless lizard, white-tailed kite, and American badger. At least six sensitive plant species are known to occur in the project vicinity: Nipomo Mesa lupine, crisp monardella, Blochman's leafy daisy, California spineflower, sand almond, and Blochman's groundsel.

The following sensitive species were observed within the proposed area of disturbance for the rail spur extension: western burrowing owl, Bell's sage sparrow, Blochman's groundsel, California spineflower, sand almond, and Blochman's leafy daisy. Sensitive species identified within the proposed area of disturbance for the vertical coastal access include western burrowing owl, Blochman's groundsel, California spineflower, sand almond, Blochman's leafy daisy, crisp monardella, and Nipomo Mesa lupine.

The nearest blue line creeks are located at least 1,000 feet from the proposed rail spur extension and off-loading facility, though the emergency access road would come within 500 feet of an un-named tributary of Oso Flaco Creek at the southeastern portion of the project site. A small wetland community is located approximately 600 feet south of the proposed off-loading facility, outside of the proposed area of disturbance.

The project applicant will be required to prepare a Stormwater Pollution Prevention Plan (SWPPP)

that has been approved by the Regional Water Quality Control Board (required whenever 1 or more acres of disturbance would occur). The SWPPP will include measures to reduce the potential for sedimentation, erosion and drainage impacts to existing downstream water sources.

Due to the area's special environmental qualities, areas west of the railroad have been designated as within the County's SRA combining designation and are also considered ESHA due to the potential value of the Terrestrial Habitat (TH) at that location. Additional areas within the project site that contain habitat and/or qualities consistent with those found in an SRA, TH, or ESHA designation would also be considered Environmentally Sensitive Habitat Area. Special requirements will apply to these areas relating to the protection of sensitive biological resources, which are intended to preserve and protect rare and endangered plants and wildlife and the habitat in which they reside.

Impact. Rail Spur Extension. The project would result in the removal of a large amount of on-site vegetation, including areas that may qualify as ESHA. Appropriate habitat characteristics for certain sensitive wildlife and plant species exist at the project site and are likely to support candidate or listed special status species. Construction and development activities associated with the rail extension have the potential to disrupt these sensitive species and/or damage or destroy suitable habitat areas. Construction and operational activities also have the potential to disturb a variety of nesting raptors or migratory birds, in violation of the California Fish and Game Code and Migratory Bird Treaty Act, resulting in a potentially significant impact. Particularly, the U.S. Department of Fish and Wildlife has indicated that the last remaining populations of the Nipomo Mesa lupine may occur on the refinery property. After the dry season, the species may currently persist only as an underground seed bank.

The project is not located within 500 feet of a creek or riparian habitat area and no direct impacts to riparian areas are expected to occur. However, construction equipment may be required to travel in close proximity to riparian habitat areas or other sensitive natural resources to access the project site. Indirect impacts to biological resources in the project vicinity could result. The project is not expected to impact the small wetland habitat located on-site, though mitigation is appropriate to ensure avoidance of this area.

The rail extension would also result in development of a 1.3-mile-long linear track, which would bisect the large undeveloped area on the project site. This bisection could disrupt the movement of wildlife across the project site, causing a potentially significant impact.

Coastal Access. A variety of sensitive wildlife and plant species have the potential to occur on the western portion of the project site at the location of the proposed coastal accessway. The coastal access component of the project would extend through protected SRA and ESHA areas, triggering additional requirements in the CZLUO. Construction activities would degrade the natural habitat of the dunes and potentially disturb or damage sensitive species and habitats. Introduction of pedestrian and bicycle traffic could also result in adverse impacts to surrounding sensitive biological resources due to users straying from the designated path, trampling and erosion of dunes, introduction of invasive plant species, and litter.

Mitigation/Conclusion. The project site is known to support several state- and federally-listed special status species. It also includes areas that constitute protected SRAs and/or ESHA that would be disturbed during construction and operation of the project. The EIR shall evaluate the potential and extent of adverse impacts to biological resources associated with development of the proposed project. The discussion in the EIR shall incorporate the results of updated botanical surveys conducted during the typical blooming period for annual plant species, particularly for Nipomo Mesa lupine. Appropriate mitigation measures shall be recommended and the potential for residual impacts, resulting from implementation of the mitigation measures, shall be addressed.

5. CULTURAL RESOURCES

Will the project:	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Disturb archaeological resources?	☒	☐	☐	☐
b) Disturb historical resources?	☒	☐	☐	☐
c) Disturb paleontological resources?	☒	☐	☐	☐
d) Other: _____	☐	☐	☐	☐

Setting. The project is located in an area historically occupied by the Obispeno Chumash.

A records search of the Central Coastal Information Center, and pedestrian-level surveys on the eastern (Industrial) portion of the project site (performed in 2012 and 2013) identified one previously-recorded historical site within the project area, and nine archaeological sites within a 1-mile radius of the project site (Arcadis 2013).

The identified prehistoric resource was recorded as measuring 900 meters long by 60 meters wide located adjacent to and partially within a portion of the proposed emergency access route, and consisting of flakes stone debris and tool fragments, marine shell, and a possible hearth feature possibly occupied 1,000 to 2,000 years before present. The nine previously-identified sites in the project vicinity include seven prehistoric era archaeological sites and two historic era sites. The majority of the prehistoric sites are located south of the project site, along Oso Flaco Creek. Two prehistoric sites are located in the dune complex west of the railroad, which were found to contain marine shell (predominantly Pismo clam), flaked stone tools, and production debris.

Survey of the proposed coastal access route was performed in June 2013. A previously documented site is located immediately north of and possibly within the proposed coastal access road. As a result of pipeline construction and off-road vehicle activities, the site has been previously subjected to disturbance and a 2010 site record update indicated that the resource could not be relocated.

The project area is within the South Coast Ranges physiographic province and is comprised of surficial deposits of older Quaternary dune sands. A Paleontological Resources Records Search found no vertebrate fossil localities directly within the project area. However, fossils have been identified in nearby areas with deposits somewhat similar to those that occur in the proposed project area and on-site deposits were identified by the Natural History Museum of Los Angeles County as having the potential to produce significant vertebrate paleontological resources.

Impact. Rail Spur Extension. Surface disturbance resulting from grazing activities has diminished the potential for significant surface-level cultural resources at the site. However, based on the location of several cultural resource sites at or within close proximity to the project impact area, the potential for buried subsurface cultural resources is considered moderate to high. Site disturbance associated with the rail extension component has the potential to disturb or damage known prehistoric resource located in close proximity to the proposed emergency access road and/or other unknown buried resources.

Coastal Access. The pedestrian-level surveys completed for the project did not identify cultural resources within the proposed coastal access route; however, a previously recorded site is located immediately adjacent to and possibly within the proposed route. Based on the proximity of significant cultural resources in the immediate vicinity, this area is also presumed to have moderate to high potential to contain significant historic, archaeological and paleontological resources. Site disturbance associated with development of the paved pedestrian and bicycle path would potentially affect on-site surficial or buried cultural resources. The addition of public traffic in this previously-undisturbed area could pose an additional indirect threat to resources in the project vicinity.

Mitigation/Conclusion. Due to the presence of significant cultural resources at the project site and within close proximity to the project impact area, the project's potential effect on cultural resources shall be evaluated in the EIR. The cultural resources section of the EIR shall contain a description of the region's historical and cultural ethnography, a summary of documented resources in the project vicinity, and an analysis of potential project-related impacts to cultural and archaeological resources. The project applicant has proposed to utilize cultural resources training, cultural resources monitoring, and standard inadvertent discovery clauses as mitigation. The effectiveness of these measures will be analyzed and additional measures designed to reduce significant impacts will be developed as necessary.

6. GEOLOGY AND SOILS *Will the project:*	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
a) Result in exposure to or production of unstable earth conditions, such as landslides, earthquakes, liquefaction, ground failure, land subsidence or other similar hazards?	☒	☐	☐	☐
b) Be within a California Geological Survey "Alquist-Priolo" Earthquake Fault Zone", or other known fault zones*?	☐	☐	☒	☐
c) Result in soil erosion, topographic changes, loss of topsoil or unstable soil conditions from project-related improvements, such as vegetation removal, grading, excavation, or fill?	☒	☐	☐	☐
d) Include structures located on expansive soils?	☐	☐	☒	☐
e) Be inconsistent with the goals and policies of the County's Safety Element relating to Geologic and Seismic Hazards?	☒	☐	☐	☐
f) Preclude the future extraction of valuable mineral resources?	☐	☐	☒	☐
g) Other: _____	☐	☐	☐	☐

* **Per Division of Mines and Geology Special Publication #42**

Setting. The following relates to the project's geologic aspects or conditions:

Topography: Nearly level to moderately sloping

Within County's Geologic Study Area?: No

Landslide Risk Potential: Negligible

Liquefaction Potential: Moderate

Nearby potentially active faults?: Yes Distance? approximately 1.5 miles to the northeast

Area known to contain serpentine or ultramafic rock or soils?: No

Shrink/Swell potential of soil: Low

Other notable geologic features? None

The proposed area of disturbance is located on undulating dune topography, with elevations ranging from approximately 80 to 120 feet above mean sea level. The closest known Alquist-Priolo Earthquake Fault Zone (active fault) is the Los Osos Fault Zone, located approximately 18 miles to the north, near the city of San Luis Obispo. The closest known Quaternary (potentially active) fault is the Oceano Fault, located approximately 1.5 miles to the northeast. Although there are no known active faults in the immediate project vicinity, there is a potentially active fault within 2 miles of the project location and the entire central coast of California is subject to risk of seismic events and ground shaking. The project is within a moderate liquefaction area due to shallow groundwater and sandy dune soils, and may be subject to geologic report preparation requirements of the CZLUO to evaluate the area's geological stability. Soils have low shrink-swell potential due to the minimal presence of clay in on-site soils.

Impact. Rail Spur Extension. The proposed rail spur and associated oil pipeline would be susceptible to damage as a result of an earthquake on any proximate regional faults. Shallow groundwater and sandy soils also create a moderate potential for liquefaction in the project area. Lateral spreading and seismically-induced settlement typically occur in association with liquefaction. Seismically-induced ground failure, excessive erosion, or corrosion could result in damage to facilities and hazardous oil spills. Remediation of such spills, could, in turn, potentially cause soil erosion-induced water quality impacts to nearby drainages such as Oso Flaco Creek.

The preferred rail spur extension along a straight track has been proposed to reduce potential geologic hazards (two loop alternatives were originally considered, but were found to be more environmentally damaging). Relatively minor amounts of cut and fill would be required for the straight alignment. Additionally, above-ground construction of the conveyance pipeline would minimize geologic impacts by reducing the need for excavations and stockpiling of soil, thus reducing potential construction-related erosion. However, 48.9 acres of site disturbance would occur, and ground stability issues continue to be a potential concern.

Coastal Access. Topography of the dunes west of the railroad is more moderately sloping, and the potential for soil erosion and soil instability would be slightly more severe at this location than the flatter areas on the east side of the project site. Potential impacts associated with development of the coastal pathway would be similar to those of the rail spur extension component, and include coastal bluff erosion, liquefaction, and seismically-induced ground failure. The potential dangers that would result from a geologic event at this location would be much less significant, however, as no hazardous spills or loss of industrial structures would occur.

Mitigation/Conclusion. The project site is moderately susceptible to ground failure incidents due to on-site geologic conditions and soils. Because of the nature of the industrial activities proposed, the effects of such an incident could be severe, and include hazardous oil spills, risk of fire, and soil, ground and surface water contamination. The EIR prepared for the project shall assess the geologic risks associated with additional development at the project site. The County Building Division has required that a full soils report be developed that addresses the design parameters of all building/structure foundations.

7. HAZARDS & HAZARDOUS MATERIALS - ***Will the project:***	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**

7. HAZARDS & HAZARDOUS MATERIALS - *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Create a hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☒	☐	☐	☐
b) Create a hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☒	☐	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼-mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on, or adjacent to, a site which is included on a list of hazardous material/waste sites compiled pursuant to Gov't Code 65962.5 ("Cortese List"), and result in an adverse public health condition?	☒	☐	☐	☐
e) Impair implementation or physically interfere with an adopted emergency response or evacuation plan?	☐	☐	☒	☐
f) If within the Airport Review designation, or near a private airstrip, result in a safety hazard for people residing or working in the project area?	☐	☐	☒	☐
g) Increase fire hazard risk or expose people or structures to high wildland fire hazard conditions?	☒	☐	☐	☐
h) Be within a 'very high' fire hazard severity zone?	☐	☐	☒	☐
i) Be within an area classified as a 'state responsibility' area as defined by CalFire?	☒	☐	☐	☐
j) Other: _____	☐	☐	☐	☐

Setting. The project location is the site of the Santa Maria Refinery and is the site of routine hazardous materials processing, storage and transfer. The refinery was originally owned by Union Oil Company of California, while an adjacent carbon plant was owned by Collier Chemicals. Union Oil Company of California subsequently acquired the carbon plant and processed petroleum residuals

from the carbon plant in the carbon plant kiln to produce a specialty petroleum coke product called "carbon black". Debris from this process was stored on-site with other industrial debris, coke and sand. The "carbon black" debris piles were identified as the source of elevated levels of nickel and vanadium that exceeded acceptable hazardous waste limits in California. This disposal practice has since been regulated, and the process for cleanup and removal of the materials from the site was initiated in May 2013 and is ongoing.

Despite the long history of industrial petroleum processing uses, the site is not listed on the Cortese List of hazardous materials cleanup sites developed pursuant to California Government Code Section 65962.5. The State Water Resource Control Board's GeoTracker Database provides a list of hazardous materials sites regulated by the state. The project site is identified by GeoTracker as a Cleanup Program Site (RB Case #: SL203121248) with an "Open – Site Assessment" cleanup status (refer to http://geotracker.waterboards.ca.gov). Potential contaminants of concern listed are metals/heavy metals, petroleum, fuels, oils, and polynuclear aromatic hydrocarbons. Site history indicates that management of the on-site coke piles has been changed so that industrial and stormwater do not flow into the area of coke pile storage. Groundwater on site is monitored to determine if metals and other constituents from the coke piles are leaching from the surface into the groundwater. This case has been open since 1995.

The site is within the High Severity Fire Hazard Zone and a 5 to 10 minute Emergency Response Time area. The project location is within an area classified as "state responsibility" by CalFire. The project is not within the Airport Review area, and there are no schools or public or private airports within 0.25 mile of the project site.

Impact. Rail Spur Extension. Construction of the rail extension and off-loading facilities would involve the use of oil, fuel, and other potentially hazardous materials required for the operation of construction equipment. Hazardous materials could include fuels, lubricants, asphalt, paints, and solvents. Any earthmoving activities or site disturbance in the vicinity of the existing refinery and coke pilings has the potential to disturb hazardous materials stored at the site or that have leached into on-site soils. Use, transport and storage of hazardous materials during construction could result in accidental release of hazardous materials which could degrade soil, ground and surface water in the project vicinity. The presence of these hazardous materials could also create additional sources of fuel (i.e., stored fuels, cleared vegetation piles) and ignition (i.e., electric tools that may produce a spark or flame, smoking by construction workers) for fires and explosions.

Project operations would include the routine transportation, conveyance, storage and processing of crude oil, but would not involve an increase in the existing total amount of crude oil processed or product generated at the refinery. Operation of the project would involve the use of equipment and vehicles that use hazardous materials such as fuels, lubricants, and solvents. The presence of these materials during the operational phase of the project could result in an accidental release of dangerous materials or increase the chance of a fire.

Development of the new rail extension (comprised of five parallel ladder tracks) and off-loading facility and the transport of crude oil to the new facilities may potentially result in an increased risk of collisions, derailment, and accidental spills from the unloading system.

Coastal Access. The Coastal Access component of the proposed project would involve the use of similar hazardous materials during construction activities and similar risks of an accidental spill or fire. Construction of this component would be less intensive than the rail spur extension, thereby reducing the potential for impacts; however, contamination from an accidental spill or fire could be significantly more damaging to the sensitive habitat and vegetation at this location.

Vehicular use of the coastal accessway is not proposed at this time. Bicycle use of the trail could involve the presence of some limited hazardous materials, such as oils and lubricants, and pedestrians could also bring dangerous materials and/or sources of fuel and ignition for fires (such as cigarette lighters), as well as litter within the sensitive dune area.

Mitigation/Conclusion. The proposed project has the potential to result in significant adverse impacts related to hazards / hazardous materials and shall therefore be analyzed in the EIR. The EIR analysis shall include an assessment of the risk of disturbance of hazardous materials or upset as a result of the project, including risks associated with the proposed facilities and potential release scenarios. The probability and consequences of potential accidental release scenarios will be analyzed to determine the level of severity of potential environmental impacts.

8. NOISE

Will the project:	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
a) Expose people to noise levels that exceed the County Noise Element thresholds?	☒	☐	☐	☐
b) Generate permanent increases in the ambient noise levels in the project vicinity?	☒	☐	☐	☐
c) Cause a temporary or periodic increase in ambient noise in the project vicinity?	☒	☐	☐	☐
d) Expose people to severe noise or vibration?	☒	☐	☐	☐
e) If located within the Airport Review designation or adjacent to a private airstrip, expose people residing or working in the project area to severe noise levels?	☐	☐	☒	☐
f) Other: _____	☐	☐	☐	☐

Setting. The project area is zoned for Industrial and Open Space uses. The County limits daytime (7:00 a.m. to 10:00 p.m.) noise levels to 50 decibels A-weighted (dBA Leq) at residential property lines. Short-term construction noise is exempt from County noise regulations provided it takes place during daytime hours (noted above, and 8:00 a.m. to 5:00 p.m. on Saturday and Sunday). Pursuant to the Federal Transit Administration, a vibration level of 65 VdB is the threshold of perceptibility for humans.

The closest sensitive receptors to the project site are single-family residences located east of State Route 1 approximately 3,300 feet (0.625 mile) from the proposed project site and along Olivera Avenue at a distance of approximately 4,200 feet (0.8 mile). There are also non-conforming residential uses in the Callendar-Garrett industrial area north of refinery, within 0.5 miles of the existing refinery.

Impact. Rail Spur Extension. The proposed project would generate both short-term construction and long-term operational noise and vibrations. Possible sources of vibration include excavators, dump trucks, backhoes, and other grading and earthmoving equipment, as well as increased rail and locomotive operations along the new spur extension. The transport of crude oil to the refinery could also create noise impacts along the transport route outside of the immediate project area. Typical construction and operational equipment can produce noise and vibration levels that exceed acceptable County thresholds; however, these levels would dissipate over the distance between the source and nearby receptors.

The applicant-prepared Technical Noise Study indicates that noise and vibration levels resulting from construction and operation of the proposed project would not exceed acceptable thresholds. However, project activities could still generate a temporary or permanent increase in ambient noise and vibration levels in the project vicinity, resulting in a potentially significant impact.

Coastal Access. Construction of the proposed accessway would generate noise and vibration as a result of heavy machinery used during construction activities. These sources are generally exempt from noise regulations provided they are limited to daytime hours. Operational uses of the coastal access would be limited to pedestrian and bicycle traffic, and is therefore not expected to result in significant noise effects. Therefore, noise impacts associated with the coastal access component of the project are anticipated to be less than significant.

Mitigation/Conclusion. The project would generate new sources of short-term construction noise and vibration, and operation of the rail spur extension would create permanent sources of noise and vibration at the site, potentially resulting in a significant environmental impact. New noise and vibration levels resulting from the proposed industrial components shall be assessed in the EIR to determine whether they exceed County thresholds or constitute a significant increase in ambient levels, resulting in a significant impact. Although the project would not increase the volume of crude oil processed at the site, the EIR shall assess whether any increase in the number of train trips would be likely to occur as a result of the project, and quantify the resulting noise effects. The EIR shall assess the potential for increases in noise and vibration levels along likely transport routes associated with any additional trips for transport of crude oil. Calculations shall be made to estimate peak and average noise exposure levels at residences and sensitive receptors in the project vicinity and along transport routes.

9. POPULATION/HOUSING *Will the project:*	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
a) Induce substantial growth in an area either directly (e.g., construct new homes or businesses) or indirectly (e.g., extension of major infrastructure)?	☐	☐	☒	☐
b) Displace existing housing or people, requiring construction of replacement housing elsewhere?	☐	☐	☒	☐
c) Create the need for substantial new housing in the area?	☐	☐	☒	☐
d) Other: _____	☐	☐	☐	☐

Setting. The proposed project is located within the unincorporated area of San Luis Obispo County, just west of the community of Nipomo. The site is located within the South County Coastal planning area. The area which has experienced, and continues to experience, the highest growth rate in South County is Nipomo, which experienced tremendous growth from 1990 to 2008; however, new development is also occurring in even the most remote areas of the Nipomo Mesa.

The major constraint to development is the availability and feasibility of community services, including water supply, sewage disposal, and transportation improvements. Dramatic growth in the Nipomo urban and Nipomo Mesa areas is placing strains on infrastructure, including water availability, roads

and schools.

In its efforts to provide for affordable housing, the county currently administers the Home Investment Partnerships (HOME) Program and the Community Development Block Grant (CDBG) program, which provides limited financing to projects relating to affordable housing throughout the county. The County's Inclusionary Housing Ordinance requires provision of new affordable housing in conjunction with both residential and nonresidential development and subdivisions.

Impact. Rail Spur Extension. Development of the project would require approximately 100-200 workers over a construction period of nine to ten months. Most of this labor is expected to come from the local labor pool; therefore, development of the project is not expected to directly or indirectly induce population growth in the area. Specialty construction contractors from outside the immediate area would be used on an as-needed basis over the short-term construction period, but are not expected to induce substantial growth in the area. Construction of the project would not create any new public infrastructure that would indirectly induce population growth or remove any existing constraint to growth.

Operation of the project would result in the creation of four to six new permanent positions. The project may therefore result in a minimal increase in local population growth or housing demand. The local housing market would be able to accommodate the marginal growth. There is no housing on the project site and no houses would be displaced as a result of the project.

Coastal Access. Construction of the coastal access trail would require an undetermined number of workers during construction. The number of workers and length of construction is not expected to be significant, and workers would likely come from the local workforce. Operation of the trail would not induce significant population growth in the area, though an increase in temporary visitors or vacationers accessing the dunes may occur.

Mitigation/Conclusion. No significant population and housing impacts are anticipated. These conditions and potential project-related effect shall be confirmed in the EIR.

10. PUBLIC SERVICES/UTILITIES

Will the project have an effect upon, or result in the need for new or altered public services in any of the following areas:	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
a) Fire protection?	☒	☐	☐	☐
b) Police protection (e.g., Sheriff, CHP)?	☒	☐	☐	☐
c) Schools?	☐	☐	☒	☐
d) Roads?	☒	☐	☐	☐
e) Solid Wastes?	☒	☐	☐	☐
f) Other public facilities?	☐	☐	☒	☐
g) Other: _____	☐	☐	☐	☐

Setting. The project area is served by the following public services/facilities:

Police: County Sheriff Location: Oceano (Approximately 4.25 miles to the north)

Fire: Cal Fire (formerly CDF) Hazard Severity: High Response Time: 5-10 minutes

Location: Approximately 0.3 mile to the north

School District: Lucia Mar Unified School District.

The County-adopted Public Faciltiies Fee Ordinance (Title 18) provides for the collection of a fair-share fee from new development to help mitigate for cumulative impacts on public facilities. This fee is currently helping fund capital improvements to libraries, fire, general government, parks and recreation, and sheriff's patrol.

Impact. Rail Spur Extension. The proposed project is located in a High Fire Hazard Area and would also involve the use of highly flammable and hazardous substances, thereby increasing the need for fire services. The nearest CalFire station is located immediately north of the project site, but the capacity of CalFire to service the additional demands generated by the project is unknown. No significant increase in police protection services are expected to result. The project will also generate hazardous solid waste, the disposal of which may result in significant direct, secondary or residual impacts. The waste materials may contain hazardous materials or contaminated soils, requiring disposal at certified hazardous waste disposal facilities, which could lead to longer truck trips and associated traffic, noise and air quality effects. The addition of heavy construction and operational vehicles could degrade local roads due to increased wear and congestion. As with most development, the project may contribute to cumulatively increasing demands on schools, parks, roads, and other public facilities. However, payment of required fair-share fees is expected to mitigate potential impacts to less than significant levels.

Coastal Access. Construction of the coastal accessway would generate minimal increased demand on fire, police and solid waste services, but is not expected to result in significant impacts. Operation of the open space/recreational use may result in increased demands on police protection services, access roads, and solid waste providers, but these effects are expected to be minimal.

Mitigation/Conclusion. The proposed project has the potential to result in significant impacts to fire protection and solid waste services. The existing capacity of these public services and the potential and severity of environmental impacts shall be analyzed in the EIR. The analysis shall also confirm that affected public services and utilities have available capacity to service the proposed project.

11. RECREATION

Will the project:	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
a) Increase the use or demand for parks or other recreation opportunities?	☐	☐	☒	☐
b) Affect the access to trails, parks or other recreation opportunities?	☐	☐	☒	☐
c) Other: *Create a recreational facility in an area unsuited for recreational uses?*	☒	☐	☐	☐

Setting. The project site is located east of the Oceano Dunes State Vehicular Recreation Area, and northeast of the Oso Flaco Day Use Area and Oso Flaco Lake Trail. The Nipomo Bluff Trail terminates approximately 0.6 mile east of the rail spur location, and the Juan Batista de Anza National Historic Trail follows State Route 1 through the project area.

The nearest vertical coastal access points are located approximately 3.6 miles to the north (pedestrian and vehicle) and 0.74 mile south (pedestrian only). A permit previously issued for the project site (DRC2008-00146, the “Phillips 66 Throughput Project”) included a requirement for an offer of dedication for vertical access at this location as well as evaluation of the suitability and the

appropriate intensity of use at this location. The above referenced permit is currently being reviewed by the California Coastal Commission as a result of an appeal filed with their office of the action taken by the County Board of Supervisors.

Impact. Rail Spur Extension. The rail spur extension is proposed on land designated for industrial use and currently supporting petroleum refining and grazing activities. There are no existing or planned recreational uses on this portion of the project site, and recreational activities would likely be incompatible with existing and proposed uses. No significant population growth is expected to result from the project and no increased demand on recreational resources in the project area would occur. No impacts would result.

Coastal Access. The coastal access component of the project would potentially provide new vertical pedestrian and bicycle access to the Oceano Dunes State Vehicular Recreation Area and beach, resulting in a beneficial impact on recreational resources. It would not interfere with existing or planned recreational trails, parks or other recreational opportunities in the area, and would not generate an increased demand on recreational resources in the area. It would likely improve connectivity with the Nipomo Bluff Trail. However, the development of a recreational trail at this location could result in land compatibility conflicts and issues related to public safety.

Mitigation/Conclusion. Direct impacts to recreational resources are expected to be minimal. However, the EIR shall include, at minimum, a programmatic-level discussion of potential land use conflicts associated with development of the coastal access trail at the project location.

12. TRANSPORTATION/CIRCULATION *Will the project:*	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
a) Increase vehicle trips to local or areawide circulation system?	☒	☐	☐	☐
b) Reduce existing "Level of Service" on public roadway(s)?	☒	☐	☐	☐
c) Create unsafe conditions on public roadways (e.g., limited access, design features, sight distance, slow vehicles)?	☒	☐	☐	☐
d) Provide for adequate emergency access?	☐	☐	☒	☐
e) Conflict with an established measure of effectiveness for the performance of the circulation system considering all modes of transportation (e.g. LOS, mass transit, etc.)?	☒	☐	☐	☐
f) Conflict with an applicable congestion management program?	☐	☐	☒	☐
g) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☒	☐	☐	☐
h) Result in a change in air traffic patterns that may result in substantial safety risks?	☐	☐	☒	☐

12. TRANSPORTATION/CIRCULATION

Will the project:	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
i) Other: _____	☐	☐	☐	☐

Setting. The County has established the acceptable Level of Service (LOS) on roads in rural area as LOS "C" or better (LOS "D" in urban areas). Refinery traffic currently utilizes State Route 1, Willow Road, Pomeroy Road, West Tefft Street, State Route 166, and U.S. Highway 101 to access the project site. Some intersections along the transfer route currently operate at unacceptable levels during peak traffic (i.e., the intersection of West Tefft Street and Highway 101).

The refinery currently generates approximately 160 round-trip employee trips per day, five round-trip truck trips per day, and 41 round-trip coke removal truck trips per day, for a total of 206 round-trip trips per day (412 one-way trips).

Impact. Rail Spur Extension. The proposed project would generate, on average, approximately 40 round-trip worker trips during construction, with a short-term peak of up to 200 trips per day during assembly of the off-loading facility and pipeline. Operation of the proposed facility would generate the need for between one and six round-trip employee trips per day. These additional trips would access the site via the existing transportation system, parts of which currently operate at unacceptable levels during peak hours, potentially resulting in a significant impact. The additional heavy truck traffic could also damage the local and regional road network due to wear and tear resulting from heavy vehicle use. Any increase in the transfer of hazardous materials may also increase the potential for unsafe conditions on local roadways by bringing dangerous materials within close proximity to sensitive land uses and populations along the transfer route. Adequate emergency access is proposed to be developed from the new rail extension to State Route 1, reducing potential impacts associated with adequate emergency access.

Coastal Access. A provision of vertical coastal access at this location would generate additional construction and recreational trips to the project area. The number and extent of the additional trips is unknown at this time; however, due to the significant recreational resources and popularity of the Oceano Dunes State Recreational Vehicle Area, increased traffic could be significant. The availability (or lack thereof) of sufficient parking in the vicinity of the trail head may also generate congestion, trespass concerns and/or circulation impacts.

Mitigation/Conclusion. The project may result in significant impacts related to traffic congestion, safety concerns, and degradation of local roads, among others. These issues shall be addressed in the EIR.

13. WASTEWATER

Will the project:	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Violate waste discharge requirements or Central Coast Basin Plan criteria for wastewater systems?	☒	☐	☐	☐
b) Change the quality of surface or ground water (e.g., nitrogen-loading, day-lighting)?	☒	☐	☐	☐
c) Adversely affect community wastewater service provider?	☐	☐	☒	☐

13. WASTEWATER

Will the project:

	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
d) Other: _____	☐	☐	☐	☐

Setting. Regulations and guidelines on proper wastewater system design and criteria are found within the County's Plumbing Code (hereafter CPC; see Chapter 7 of the Building and Construction Ordinance [Title 19]), the "Water Quality Control Plan, Central Coast Basin" (Regional Water Quality Control Board [RWQCB] hereafter referred to as the "Basin Plan"), and the California Plumbing Code. These regulations include specific requirements for both on-site and community wastewater systems. These regulations are applied to all new wastewater systems.

For on-site septic systems, there are several key factors to consider for a system to operate successfully, including the following:

- ✓ Sufficient land area (refer to County's Land Use Ordinance or Plumbing Code) – depending on water source, parcel size minimums will range from one acre to 2.5 acres;
- ✓ The soil's ability to percolate or "filter" effluent before reaching groundwater supplies (30 to 120 minutes per inch is ideal);
- ✓ The soil's depth (there needs to be adequate separation from bottom of leach line to bedrock [at least 10 feet] or high groundwater [5 feet to 50 feet depending on percolation rates]);
- ✓ The soil's slope on which the system is placed (surface areas too steep creates potential for daylighting of effluent);
- ✓ Potential for surface flooding (e.g., within 100-year flood hazard area);
- ✓ Distance from existing or proposed wells (between 100 and 250 feet depending on circumstances); and
- ✓ Distance from creeks and water bodies (100-foot minimum).

To assure a successful system can meet existing regulation criteria, proper conditions are critical. Above-ground conditions are typically straight-forward and most easily addressed. Below ground criteria may require additional analysis or engineering when one or more factors exist:

- ✓ the ability of the soil to "filter" effluent is either too fast (percolation rate is faster or less than 30 minutes per inch and has "poor filtering" characteristics) or is too slow (slower or more than 120 minutes per inch);
- ✓ the topography on which a system is placed is steep enough to potentially allow "daylighting" of effluent downslope; or
- ✓ the separation between the bottom of the leach line to bedrock or high groundwater is inadequate.

Based on Natural Resource Conservation Service (NRCS) Soil Survey map, the soil type(s) for the project is provided in the listed in the previous Agricultural Resource section. The main limitation(s) of this soil for wastewater effluent include:

-***poor filtering characteristics*** due to the very permeable nature of the soil, without special engineering will require larger separations between the leach lines and the groundwater basin to provide adequate filtering of the effluent.

- wetness or high groundwater, where this soil at this location tends to frequently be in a saturated condition due to several possible factors, such as high groundwater or it is in a low lying area

that is being regularly fed by a water source. The on-site system needs at least five feet between the bottom of the leach line to the saturated soil (e.g. high groundwater) where the five feet of soil does not remain in a saturated condition for any length of time. Otherwise, special engineering will be required to provide this separation.

Impact. Rail Spur Extension. The project proposes development of an on-site septic system to manage operational wastewater. It is unknown at this time whether on-site conditions are suitable for a subsurface disposal system. Anticipated limitations include high groundwater and poor filtering characteristics of the sandy on-site soils. Improper development of a septic system could result in groundwater contamination or daylighting of effluent, which would be considered a significant environmental impact.

Coastal Access. The coastal access component is not expected to result in the generation of additional wastewater and no on-site wastewater facilities are proposed. No impact would result.

Mitigation/Conclusion. The project proposes development of an on-site individual septic system. The EIR shall assess site conditions and analyze the site's suitability for subsurface sewage disposal. Any necessary design modifications will be developed to ensure proper filtering and disposal of wastewater at the project site.

14. WATER & HYDROLOGY

Will the project:

	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
QUALITY				
a) Violate any water quality standards?	☒	☐	☐	☐
b) Discharge into surface waters or otherwise alter surface water quality (e.g., turbidity, sediment, temperature, dissolved oxygen, etc.)?	☒	☐	☐	☐
c) Change the quality of groundwater (e.g., saltwater intrusion, nitrogen-loading, etc.)?	☒	☐	☐	☐
d) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide additional sources of polluted runoff?	☒	☐	☐	☐
e) Change rates of soil absorption, or amount or direction of surface runoff?	☒	☐	☐	☐
f) Change the drainage patterns where substantial on- or off-site sedimentation/ erosion or flooding may occur?	☒	☐	☐	☐
g) Involve activities within the 100-year flood zone?	☒	☐	☐	☐
QUANTITY				
h) Change the quantity or movement of available surface or ground water?	☒	☐	☐	☐

14. WATER & HYDROLOGY

Will the project:	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
i) Adversely affect community water service provider?	☐	☐	☒	☐
j) Expose people to a risk of loss, injury or death involving flooding (e.g., dam failure,etc.), or inundation by seiche, tsunami or mudflow?	☐	☐	☒	☐
k) Other: _____	☐	☐	☐	☐

Setting. Phillips 66 extracts groundwater from the Nipomo Mesa Management Area of the Santa Maria Groundwater Basin, which has been the subject of extensive litigation due to depression in groundwater elevations on the Nipomo Mesa. The County's Water Resources Advisory Committee has determined that overdraft in the Nipomo Mesa either currently exists or is imminent.

The source of groundwater for Phillips 66 wells is the deep aquifer in the Paso Robles and Careaga formations underlying the Nipomo Mesa. The deep aquifer is also the primary source of water for surrounding agricultural and municipal wells. Based on the Judgment after Trial of the Santa Maria Groundwater Litigation, Phillips 66 has rights to the reasonable and beneficial use of groundwater without limitation, except in the event of a Severe Water Shortage Condition, in which case water rights would be limited to no more than 110% of the highest amount it previously used in a single year.

The topography of the project is nearly level to moderately sloping The closest creek from the proposed development is approximately 0.4 mile away. As described in the NRCS Soil Survey, the soil surface is considered to have high erodibility.

DRAINAGE – The following relates to the project's drainage aspects:

Within the 100-year Flood Hazard designation? Yes

Closest creek? tributary of Oso Flaco Creek Distance? Approximately 2,000 feet

Soil drainage characteristics: Well drained

For areas where drainage is identified as a potential issue, the Land Use Ordinance (CZLUO Sec. 23.05.042) includes a provision to prepare a drainage plan to minimize potential drainage impacts. When required, this plan would need to address measures such as: constructing on-site retention or detention basins, or installing surface water flow dissipaters. This plan would also need to show that the increased surface runoff would have no more impacts than that caused by historic flows.

SEDIMENTATION AND EROSION – Soil type, area of disturbance, and slopes are key aspects to analyzing potential sedimentation and erosion issues. The project's soil types and descriptions are listed in the previous Agriculture section under "Setting". As described in the NRCS Soil Survey, the the project's soil erodibility is as follows:

Soil erodibility: High

A sedimentation and erosion control plan is required for all construction and grading projects (CZLUO Sec. 23.05.036) to minimize these impacts. When required, the plan is prepared by a civil engineer to address both temporary and long-term sedimentation and erosion impacts. When work is done in the rainy season, the County's Coastal Zone Land Use Ordinance requires that temporary erosion and sedimentation measures to be installed. Projects involving more than one acre of disturbance are

subject to the preparation of a Storm Water Pollution Prevention Plan (SWPPP), which focuses on controlling storm water runoff. The Regional Water Quality Control Board is the local extension who monitors this program.

Impact. Rail Spur Extension. The proposed rail spur extension would be located on dune sand on relatively flat to undulating topography, at least 1,000 feet from the nearest drainage feature. Although the 100-year Flood Hazard Zone encompasses the southernmost portions of the project site, the proposed area of disturbance is located outside of the flood hazard area. However, construction and operation of the rail spur would increase impervious surfaces at the site and the potential risk of spills or train derailment, resulting in a potentially increased risk of water quality impacts. The emergency access road also comes within closer proximity of the Oso Flaco Creek tributary (approximately 500 feet), and runoff and erosion along the access route could contaminate surface water within the creek. While past activities at the site have not been found to be detrimental to groundwater, the potential for contamination exists as a result of the use and storage of significant amounts of crude oil.

Operational activities would be expected to increase water use by approximately one percent, which would be in compliance with the Judgment after Trial on the Santa Maria Groundwater Litigation. Construction activities would be short-term and limited in nature, but may require use of water trucks to keep dust levels down and other incidental water usage. Due to the current overdraft situation in the Nipomo Mesa, an analysis of available water supply to meet the one percent increase in demand shall be completed.

Coastal Access. The coastal accessway would be located on highly erosive, moderately sloped dune sands west of the railroad tracks and would increase impervious surfaces in this area. Jack Lake, a coastal wetland / dune lake area, is located north of and adjacent to the proposed coastal access route. A SWPPP would be required to assess the potential for runoff and stormwater impacts. Water quality impacts are potentially significant due to the proximity of Jack Lake to construction activities and increased human traffic in this area of highly erosive soils.

No increased water demand is expected to result from development of the coastal access trail, other than incidental uses needed during construction (i.e., water trucks, employee drinking water). Impacts to water quality and supply associated with the provision of coastal access are expected to be less than significant.

Mitigation/Conclusion. Water quality impacts could result from contamination of soils, ground or surface water, and alteration to existing stormwater runoff and drainage facilities. Because of the current overdraft condition of the basin, it is unknown whether the small increase in water demand that would result from construction and operation of the project would result in significant impacts. Therefore, these issues shall be addressed in the EIR.

15. LAND USE

Will the project:	**Inconsistent**	**Potentially Inconsistent**	**Consistent**	**Not Applicable**
a) Be potentially inconsistent with land use, policy/regulation (e.g., general plan [County Land Use Element and Ordinance], local coastal plan, specific plan, Clean Air Plan, etc.) adopted to avoid or mitigate for environmental effects?	☐	☒	☐	☐

15. LAND USE

Will the project:

	Inconsistent	Potentially Inconsistent	Consistent	Not Applicable
b) Be potentially inconsistent with any habitat or community conservation plan?	☐	☐	☒	☐
c) Be potentially inconsistent with adopted agency environmental plans or policies with jurisdiction over the project?	☐	☐	☒	☐
d) Be potentially incompatible with surrounding land uses?	☐	☒	☐	☐
e) Other: _____	☐	☐	☐	☐

Setting. The site currently supports heavy industrial uses east of the railroad corridor and undeveloped open space within the dunes at the western end of the project site. Surrounding uses are identified on Page 2 of the Initial Study, and include intensive agricultural and open space/recreational uses. Land use in the County is shaped by plans, policies and programs outlined in the County General Plan, CZLUO, and applicable Area and Specific Plans.

The project is not within or adjacent to a Habitat Conservation Plan area.

Impact. Rail Spur Extension. The project site has historically been supported industrial petroleum processing activities, and the proposed rail spur extension and crude oil processing would be consistent with past operations. While the amount of crude oil processed at the site would not increase, it is possible that the additional rail track, off-loading facility and related infrastructure would generate incompatibilities with adjacent land uses such as agriculture and residences. Additional noise, vibration, odors or other effects of the proposed industrial uses could result in a nuisance to adjacent uses.

Coastal Access. The coastal access component of the project would introduce pedestrian and bicycle traffic into the general vicinity of areas historically used for heavy industrial purposes, namely petroleum storage, processing and transport. It would also require crossing of the Union Pacific Railroad in a remote area with minimal infrastructure available to manage the integration of the two uses. This project component is also proposed in a designated SRA and ESHA, and may conflict with policies of the CZLUO.

Mitigation/Conclusion. The potential exists for the project to result in the development of incompatible land uses at the project site, predominantly associated with the coastal access provision. The consistency of the project with applicable land use plans, policies and regulations shall be analyzed in the EIR to determine whether significant land use impacts could result as a result of development of the project. Any potential inconsistencies shall be analyzed to determine the extent of resulting adverse physical impacts to the environment.

16. MANDATORY FINDINGS OF SIGNIFICANCE

Will the project:

	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Have the potential to degrade the quality of the environment, substantially				

reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? ☒ ☐ ☐ ☐

b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects) ☒ ☐ ☐ ☐

c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? ☒ ☐ ☐ ☐

The proposed project has the potential to degrade the environment, contribute to cumulatively considerable impacts, and generate signfiicant risks to human beings. An EIR will be prepared to determine the potential and extent of project-related and cumulative impacts.

For further information on CEQA or the county's environmental review process, please visit the County's web site at "www.sloplanning.org" under "Environmental Information", or the California Environmental Resources Evaluation System at: http://www.ceres.ca.gov/topic/env_law/ceqa/guidelines for information about the California Environmental Quality Act.

Exhibit A - Initial Study References and Agency Contacts

The County Planning Department has contacted various agencies for their comments on the proposed project. With respect to the subject application, the following have been contacted (marked with an ☒) and when a response was made, it is either attached or in the application file:

Contacted	Agency	Response
☐	County Public Works Department	**Not Applicable**
☐	County Environmental Health Division	**Not Applicable**
☐	County Agricultural Commissioner's Office	**Not Applicable**
☐	County Airport Manager	**Not Applicable**
☐	Airport Land Use Commission	**Not Applicable**
☒	Air Pollution Control District	**Attached**
☐	County Sheriff's Department	**Not Applicable**
☐	Regional Water Quality Control Board	**Not Applicable**
☐	CA Coastal Commission	**Not Applicable**
☐	CA Department of Fish and Wildlife	**Not Applicable**
☐	CA Department of Forestry (Cal Fire)	**Not Applicable**
☐	CA Department of Transportation	**Not Applicable**
☐	Community Services District	**Not Applicable**
☒	Other FWS	**Attached**
☒	Other HEAL-SLO	**Attached**

*** "No comment" or "No concerns"-type responses are usually not attached*

The following checked ("☒") reference materials have been used in the environmental review for the proposed project and are hereby incorporated by reference into the Initial Study. The following information is available at the County Planning and Building Department.

☒ Project File for the Subject Application

County documents

☒ Coastal Plan Policies
☒ Framework for Planning (Coastal/Inland)
☒ General Plan (Inland/Coastal), includes all maps/elements; more pertinent elements:
  - ☒ Agriculture Element
  - ☒ Conservation & Open Space Element
  - ☐ Economic Element
  - ☒ Housing Element
  - ☒ Noise Element
  - ☒ Parks & Recreation Element/Project List
  - ☒ Safety Element
☒ Land Use Ordinance (Inland/Coastal)
☐ Building and Construction Ordinance
☒ Public Facilities Fee Ordinance
☐ Real Property Division Ordinance
☐ Affordable Housing Fund
☐ Airport Land Use Plan
☐ Energy Wise Plan
☒ South County (Coastal) Area Plan
☐ Design Plan
☐ Specific Plan
☒ Annual Resource Summary Report
☒ South County Circulation Study

Other documents

☒ Clean Air Plan/APCD Handbook
☒ Regional Transportation Plan
☒ Uniform Fire Code
☒ Water Quality Control Plan (Central Coast Basin – Region 3)
☒ Archaeological Resources Map
☒ Area of Critical Concerns Map
☒ Special Biological Importance Map
☒ CA Natural Species Diversity Database
☒ Fire Hazard Severity Map
☒ Flood Hazard Maps
☒ Natural Resources Conservation Service Soil Survey for SLO County
☒ GIS mapping layers (e.g., habitat, streams, contours, etc.)
☐ Other

In addition, the following project specific information and/or reference materials have been considered as a part of the Initial Study:

Arcadis. June 18, 2013. *Land Use Permit Application.* Submitted on behalf of Phillips 66 Company.

Arcadis. June 18, 2013. *Fire Safety Plan*.

Arcadis. June 2013. *Cultural Resources Assessment Report, Phillips 66 Santa Maria Refinery Rail Project, San Luis Obispo County, California*.

Arcadis. June 13, 2013. *Biological Assessment, Santa Maria Refinery Rail Project, San Luis Obispo County, California*.

Arcadis. June 17, 2013. *Wildlife and Habitat Assessment, Santa Maria Refinery Rail Project, San Luis Obispo County, California.*

Arcadis. June 18, 2013. *Technical Noise Study, Santa Maria Refinery Rail Project, San Luis Obispo County, California.*

Arcadis. June 2013. *View Simulations*.

Nipomo Mesa Management Area Technical Group. April 2013. *Nipomo Mesa Management Area 5th Annual Report, Calendar Year 2012.*

Phillips 66 Company. January 2012. *2011 Consumer Confidence Report, Revised January 2012.*

San Luis Obispo Air Pollution Control District. June 4, 2013. *Oceano Dunes: Air Quality Issues & Solutions.* CAPCOA Engineering Managers Symposium.

Science Applications International Corporation. May 2012. *Water Supply Assessment, Conoco Phillips Santa Maria Facility Expansion Project.* Prepared for San Luis Obispo County Air Pollution Control District on behalf of Marine Research Specialists, Inc.

APPENDIX A

Project Description

Introduction

Phillips 66 Company (Phillips 66) proposes to modify the existing rail spur currently on the southwest side of the Santa Maria Refinery (SMR) located in unincorporated San Luis Obispo County California (see Figures 1 and 2). The project would include an eastward extension of the existing rail spur as well as a railcar unloading facility. The trains would deliver crude oil to the SMR for processing. The unloaded material would be transferred from the new unloading facility to existing crude-oil storage tanks via a new on-site above-ground pipeline. The unloading area would also include employee facilities such as a restroom.

The proposed tracks and unloading facilities are designed to accommodate unit trains and manifest trains. Unit trains consist of approximately 80 tank cars and associated locomotives and other supporting cars that stay together as one assembly. Manifest trains may have a variety of car types and cargos and are not fully dedicated as are unit trains. Manifest trains may deliver one or more cars to the refinery and then continue to other destinations to deliver other cargo.

Project Purpose and Objectives

The purpose of the project is to allow SMR to access a full range of competitively priced crude oil. The facility currently processes San Joaquin crude oil, one of the heaviest crude oils available. The project does not allow for an increase in the processing capacity or throughput. The project would extend the existing rail spur within the refinery and install the necessary infrastructure to safely and efficiently transfer crude oil from rail cars to the existing refinery storage tanks for processing. As defined by the International Energy Agency, the term crude oil comprises crude oil, natural gas liquids, refinery feedstocks, and additives as well as other hydrocarbons (including emulsified oils, synthetic crude oil, mineral oils extracted from bituminous minerals such as oil shale, bituminous sand, etc., and oils from coal liquefaction). Crude oil is a mineral oil consisting of a mixture of hydrocarbons of natural origin and associated impurities, such as sulphur.

Project Location

The refinery has been operating since 1955 and is located in unincorporated San Luis Obispo County, near the City of Arroyo Grande on the Nipomo Mesa. The project would occur entirely within the existing Phillips 66 boundary. In the project description and impact assessment presented below, the term ‘site’ is used to refer to the area directly affected by construction, including grading, excavation, rail construction and fencing. The larger grounds of SMR are referred to as the Phillips 66 property and the adjacent and surrounding lands within San Luis Obispo County and nearby incorporated municipalities are referred to as the project area.

Proposed Facilities

Phillips 66 proposes to modify the existing rail spur on the southwest side of the refinery to include an eastward extension as well as an unloading facility, new, on-site transfer conveyance (pipelines), and a restroom (see Figures). Additionally, CalFire has requested an unpaved eastern Emergency Vehicle Access route between the eastern end of the rail spur and Highway 1. The tracks and unloading facilities have been designed to accommodate trains of approximately 80 tank cars and associated locomotives in unit train or manifest train configurations. These trains would deliver crude oil to the facility for processing.

The unloaded material would be transferred to the existing storage tanks via a new pipeline that would be constructed across the existing coke storage area and along an existing internal refinery road.

The project would also include work within the existing refinery connecting and upgrading existing infrastructure. This includes adding a new electricity cable to an existing pipeway and adding a new fire water pipeline to an existing pipe rack. The rails on the existing rail spur would also be replaced.

The new rail spur lines would extend approximately 2600 yards from the terminus of the current spur. The unloading facility would be located at the end of the existing coke storage area and along an existing internal refinery road to and provide an efficient route for the new, above-ground pipeline to convey the crude oil to existing tanks.

The approximate construction areas are summarized below and shown on Figure 2:

- 2305 yards (2110 m) – Length of spur extension (including approximately 815 yards within the existing industrial coke plant area)
- 270-feet (82m) – Approximate width of construction area for rail extension (note that much of the area would only be affected temporarily).
- 775-yards (710 m) – Length of new pipeline from the unloading facility to the internal refinery (note that an additional 400 yards will be constructed within the existing refinery connecting to the existing storage tanks).
- 25-feet (7.5 m) – Approximate width of temporary construction area for pipeline installation

Acreage Breakdown (temporary + permanent):

- 38.6 acres – Rail Spur and Unloading Facility
- 4.1 acres – New Pipeline (mostly temporary impacts)
- 1.7 acres – Secondary Emergency Vehicle Access
- 4.5 acres – Internal Refinery Piping and Existing Track Upgrade

Collectively, the entire project, including temporary and permanent impacts, would affect approximately 48.9 acres. Of this area, a significant portion occurs within the existing refinery:

- 21.9 acres (45% of total) occurs within the existing industrial refinery area
- 27 acres occur in undeveloped areas and include portions of the rail extension, the new pipeline, and the secondary emergency vehicle access road (Figure 2).

As noted above, a significant portion of the impacts would be temporary during construction and affected plant communities would be returned to pre-project conditions following completion of construction.

Phillips 66 has designed all facilities based on geotechnical investigations and to minimize the potential for geological effects such as lateral spreading, subsidence, liquefaction, or soil collapse, and would incorporate design features such as stabilization fills, retaining walls, and removal of unstable materials if necessary.

Alternatives

Before selecting the proposed track configuration, Phillips 66 evaluated several alternatives, including 'teardrop' looped track configurations as well as a northern access track (see Figure 3 and supporting figures). The summary below compares these alternatives in terms of their areal extent, visibility from surrounding areas, amount of excavation and fill required, and potential ecological resource impacts.

Phillips 66 selected the straight track based its reduced effect on the environment compared to the other alternatives. The considered northern access would not accommodate the number of cars associated with the unit trains and was therefore technically infeasible, but also would have the highest impact on sensitive biological resources as it would need to cross the most dense population of the endangered Nipomo Mesa lupine. Both of the considered loop track configurations are challenged by the natural grade change at the southern end of the property where the Nipomo Mesa drops to the Santa Maria Valley floor. To maintain the required turn radius for the trains and to meet the grade requirements for a flat track, both loop configurations would require substantial fill along the southern portions. The small loop would require import of approximately 448,000 cubic yards of fill to raise the southern portion of the property, resulting in substantial truck trips and construction-related dust, visual impacts (e.g., from Oso Flaco Road), and other issues. The large loop was extended in an effort to avoid the grade issue, but would also require substantial fill (though less than the small loop), would have the largest construction footprint, and would encroach on the sensitive open dune habitat directly east of the refinery. The straight track requires the least excavation/fill and maximizes avoidance of sensitive natural resources.

The table below describes some of the key considerations in comparing the alternatives.

	Northern Access Track	**Small Loop Track**	**Large Loop Track**	**Straight Track (Proposed Project)**
Approximate Affected Area	Not quantified	44.23-acre footprint + 44.34 acre area enclosed by track and fencing	51.26-acre footprint + 66.27 acre area enclosed by track and fencing	48.9-acre footprint
Visibility	Medium	Highly visible fill area – 44'	Visible fill area – 25'	Low
Cut (excavation required)	Not quantified	154,000 cy	349,000 cy	120,000 cy
Fill	Not quantified	448,000 cy	218,000 cy	117,000 cy
Biological impacts	Direct impacts on endangered Nipomo Mesa lupine	Close to dune sheet habitat (70 feet)	Direct impact on dune sheet habitat	No impacts to sensitive habitat or listed species

The new facilities for the proposed project are described below.

Rail Spur Modification

Modification of the existing rail spur would include constructing up to five parallel ladder tracks, each long enough to hold an entire train (as the tracks extend east, some sets would merge reducing the affected area and the number of parallel tracks). The existing rail spur on the southern portion of the property currently provides rail access to the coke storage area and would provide a common entry point for the new tracks. Two tracks would surround an unloading rack and then would come together to form a common tail track at the east end. The tail track would allow the road locomotives to return to the common entry and leave the facility, if required, and would also allow switching the tank car strings onto and off of the unloading rack. The tail track would be long enough to accommodate two locomotives (and buffer cars) and the lead track would be long enough for 10 tank cars and the switching locomotives. A third track (the "runaround track") would allow locomotives to return to the front of the facility after dropping off an 80-car train on Track(s) 1 and (or) 2. A fourth track (Track A) would be constructed to receive a full unit train should Tracks 1 and 2 be occupied by unloading trains. The fifth track (Track B) would be used for queuing up empty cars after the unloading process is complete.

Mainline Turnout

Unit train service would not require substantial changes to the turnout from the Union Pacific mainline running north-south adjacent to the refinery. The turnout guides trains off the mainline onto the refinery's rail spur. Union Pacific may require a small change in the angle of the turnout (e.g., change from a turnout #10 to #11); however, if required, the construction of the new turnout would be a minor change from the current configuration and the construction would occur entirely within the existing disturbed track area. Because other trains continually pass through the Arroyo Grande/Santa Maria area on the Union Pacific mainline, the turnout must allow a unit train to clear the mainline without stopping. The existing rails would be replaced as part of the project.

Unloading Facility

The unloading facility would include an access platform and a system of pumps and meters, suction lines from the railcars, steam lines, and a common pipeline leading to the refinery's existing tank farm. Figure 4 provides plan and cross-section views of the proposed facility. View simulations of the facilities are provided with the figures supporting this document. The access platform would run parallel to the track, with an individual gangway and safety cage at each unloading station. The access platform and tracks would be supported by reinforced concrete construction. This area would provide structural support, spill containment (see description below), and a clear, solid work surface for the operators.

The unloading facility would be designed around "train slots" (a track that can contain an entire unit train). Union Pacific bases the number of slots on the number of trains arriving per day and/or the yearly tonnage, and the 'dwell period' (the hours that the train would be at the facility.) Phillips 66 would unload up to five trains per week. Phillips 66 estimates that a complete 80-car train would be unloaded within 12 hours. The proposed two-slot facility would allow adequate capacity unloading.

Unloading System

The unloading facility would be equipped with a 24-car unloading system with individual positive displacement pumps. The unloading rack would be configured to unload two 12-car strings simultaneously. The 600-foot-long center platform would provide access to the tops of the railcars.

The system used to unload each car would consist of an adapter unit to connect the rail car to couplings, hoses, valves, flow meters and piping connecting to a 400 gallon-per-minute (gpm) positive displacement pump. The system may employ articulated loading arms as an alternative to flexible hoses. The loading rack would be the length of 12 cars; the four additional spots would allow unloading 20 cars of either 55 or 60 feet long.

Each car's unloading system would be equipped with an air eliminator to remove vapors (mostly air) potentially mixed in with the product. Air is typically present at the beginning and end of unloading when liquid levels are low. Air removal protects the system's flow meters and ensures accurate flow measurement. This air/vapor flow would be passed through two carbon beds piped in series. The filter medium would be regenerated as needed during operations. In addition, a small volume 'prover' would be installed to allow frequent proving of flow meters. Because of high planned flow rates, a truck-mounted prover would also be available.

A computer system would be used to control and monitor the unloading system's pumps, air compressors, meters and its interface with the refinery's tank system. A new 4160V-480V power distribution center would run the pumps, ventilation system, lighting, telephones, fire alarm and fire suppression systems. Power would be supplied initially from the Carbon Plant and subsequently by extending a line from the main substation in 2015.

Fire Protection and Safety System

A new fire protection and safety system would be installed for the unloading rack, consisting of fire detection equipment, safety showers, eyewash stations, pumps, hydrants, controls and piping. The unloading rack would be equipped with a foam sprinkler deluge system and firewater monitors with foam generators at the unloading rack periphery. The foam spray system would require a foam concentrate storage tank. The system specifications are provided below. The project would also include a secondary Emergency Vehicle Access route from the eastern end of the rail spur to Highway 1.

Foam/Water Deluge System

- Square footage under canopy: 32,860 ft^2
- Divide under canopy area into 5 zones of 6,572 ft^2 each
- Assume two adjacent zones will be activated in a fire
- Design density = 0.16 GPM/ft^2
- Flow rate required = 2 x 6572 x 0.16 = 2,104 GPM
- Provide additional flow of 2 x 500 GPM monitors = 1,000 GPM
- Total fire water flow required = 3,104 GPM
- Activation of deluge valves via manual pull stations (valves) or pilot sprinkler line
- Pilot sprinkler line shall have fusible heads rated at 175°F
- Bladder tank for foam concentrate storage sized for two consecutive activations of two adjacent zones.
- Pressurizing of line downstream of deluge valve activates pressure switch for remote alarm and pressurizes hydraulic valve that opens to allow foam concentrate flow to ratio proportioner
- Assumed foam concentrate is 1% type

Foam/Water Monitors

- Monitors shall be self-educting nozzles with foam totes
- North side monitors will be mounted at grade approximately 50' away from unloading cars
- South side monitors will be provided based on final road clearance dimensions (minimum clearance from empty cars on Track B).

Water Supply System

- Install approximately 2300 feet of 8-inch pipe from the existing water line at the Coke Control Room to the unloading rack area. The supply for this pipe comes from incorporating the existing 6-inch water line and another 6-inch pipe in the area. The two lines will come together to supply the lower portion of the loop.
- Install approximately 2300 feet of 8inch pipe from the existing water line near the flare to the unloading rack area. The source of this line will either be at the 8-inch portion of the line or the 6-inch portion and will be replaced with 8-inch line to provide the adequate flow rate.
- Provide 8-inch fire water loop around the unloading rack.
- Provide two FDC's with check valve between for boosting of pressure in fire water loop at unloading rack (if necessary).
- Two new lines will tie together for a short run to allow for repumping by refinery fire truck pump into looped system around rack.

Pipeline

Downstream of the meter assembly, a new 24-inch above ground pipeline would be routed along an existing internal dirt road on the Phillips 66 property between the unloading facility and the refinery to connect with the existing crude oil storage tanks. This dirt road accommodates periodic on-site traffic only associated with refinery personnel traveling at low-speeds. The line would be approximately 1100-yards (1005 m) in length.

Access Roads

Paved access roads would be constructed near the unloading rack and around the rail spur for access by operations, safety, and maintenance crews. The access road surrounding the rail spur would be 24 feet in width along the southern side of the spur and 12 feet in width along the northern side. Appropriately sized turn-around areas meeting County and CalFire standards and a mid-way track crossing are also included to maximize efficiency in the event of an emergency. Additionally, an eastern Emergency Vehicle Access route would be constructed from the eastern end of the rail spur to Highway 1 following existing agricultural roads. The secondary access road would be improved with decomposed granite or comparable surfacing to support emergency vehicles as prescribed by CalFire but would not be paved.

Security Fence

As required by the U.S. Department of Homeland Security, an extension of the existing chain link fencing topped with barbed wire would be required around the periphery of the new tracks. Additional lighting would also be required, though light would be shielded down to minimize glare in adjacent areas.

Spill Containment and Response Facilities

Drain boxes would feed below-grade 16-inch-diameter drain lines routed to two parallel rectangular storage tanks (approximately 40,000 gallons total volume) located in a vault for containment. Two pumps would transfer any contained oil/water through a new pipeline into the existing refinery's oily water system. The

system would be sized to contain the contents of one rail car as well as the foam and water that would be released from the fire suppression system.

Phillips 66 has a number of existing process safety policies and procedures that would apply to the rail project, including the equipment and operating procedures. These programs are designed to prevent releases of hazardous materials, minimize risk, and ensure the refinery's ability to process crude without increasing risk of releases. For example, the Mechanical Integrity Program covers equipment used to process, control, and store hazardous chemicals and assigns responsibility for equipment inspection and testing as well as maintenance. This program meets the requirements of CCR Title 8 Sec 5189, "Process Safety Management of Acutely Hazardous Materials" (f), (j) and 29 CFR 1910.119, "Process Safety Management of Highly Hazardous Chemicals" (j)

The refinery uses a Positive Material Identification (PMI) program to ensure the integrity of all mechanical and pressurized systems. This program is overseen by the refinery's Inspection Supervisor.

Any new feedstock coming to the refinery undergoes a complete Management of Change (MOC) analysis to ensure that all hazards, as well as the refinery's systems are safe and operable. The MOC program is part of the refinery's Process Safety Management program and tracks equipment modification, addition of new systems and process changes. MOC covers all changes that involve specific chemicals at or above threshold limits as defined in California Code of Regulation, Section 5189, Appendix A or flammable liquids or gasses as defined by California Code of Regulations, Section 5194(c) including new construction, modifications, changes in chemicals or materials, changes in feedstock, and changes in concentrations, temperatures, pressures, or flow rates outside of established Safe Process Limits.

The refinery is also covered by the California Accidental Release Prevention (CalARP) program, which is designed to prevent accidental releases potentially harming the public and the environment and to satisfy community right-to-know laws. Phillips 66 has prepared the required Risk Management Plan (RMP) to analyze the potential for accidents and development of operating procedures, training and maintenance requirements, compliance audits and incident investigation. The refinery additionally has an approved Spill Prevention, Control and Countermeasure Plan (SPCC).

Support Buildings

The unloading facility would include a small parking area and restroom facilities. Both men's and women's restroom facilities would be served by potable water and a septic system for wastewater disposal. All septic system components would be constructed in accordance with applicable State and County regulations and State Regional Water Quality Control Board standards.

Construction

Construction would require contractor mobilization, construction site preparation, establishment of a staging and equipment laydown area, clearing and grading, removal of the existing rail turnout, laying new track, and assembling the unloading facility and pipeline. The last stage of construction would include demobilization, soil stabilization, restoring vegetation, and removal and disposal of construction wastes (e.g., demolition materials, packaging, and other solid waste).

After contractor mobilization, the site would be prepared, the limits of disturbance would be clearly marked, and initial clearing and grubbing would occur within the construction area. The site would be graded and any remaining soil would be managed on-site. If specified by Union Pacific, the existing rail turnout would be modified to accommodate the planned unit trains, including demolition/removal of approximately 1,300 feet of existing track and placement of a new turnout track and signal, if needed. This work would occur within the existing track corridor and would not require impacts outside the existing disturbed area.

The primary facilities, including the rail extension, unloading station and pipeline, would be constructed by Phillips 66 construction contractors. The number of construction workers would peak at approximately 200. Trucks would import construction materials and components (e.g., track segments, pipe), which would be stored on site in a laydown area. Track construction would include grading, soil compaction and stabilization, placement of sub-ballast and installation of rail, ties and ballast. Track ballast is used to form the rail track bed to allow drainage and to bear the weight of the rail cars. Delivery of construction materials would avoid peak traffic hours.

The unloading facility and system would be assembled adjacent to the completed tracks with connections to the refinery pipeline, stormwater collection system, and oily water treatment system.

Construction Schedule

The overall construction is anticipated to occur over a period of 9 – 10 months. In some cases, portions of the individual tasks below would occur concurrently.

- Turnout track replacement (if needed) – 2 months
- Grading/Soil Transport – 4 months
- Construction of Pipeline – 1 month
- Construction of Tracks – 4 months
- Construction of Unloading System – 2 months

Project Operations

Project operations would include unloading of up to five trains per week. Trains would arrive from different oilfields and/or crude oil loading points depending on market availability. In a unit train configuration, each train would consist of two locomotives, two buffer cars, and eighty railcars carrying 23,500 gallons each or seventy-three railcars carrying 30,000 gallons each depending on the car size, for a total of approximately 2,190,000 gallons (52,142 bbls) or 2,400,000 (57,143 bbls) of crude oil. In a manifest train configuration, varying number of railcars would be dropped off at SMR by a passing train. A dedicated locomotive would remain on-site to move cars.

Because trains would arrive at different times throughout the week, the number of workers would vary depending on the number of trains and worker arrival and departure time would vary throughout the day and night.

Unloading Sequence

The tracks and unloading rack would be designed to allow for the safe and efficient movement of multiple trains and cars in and out of the facility while minimizing the required space. Union Pacific locomotives

would arrive on Union Pacific's mainline track heading south to the SMR. Locomotives would move tank cars into the unloading facility with 10 cars positioned at the unloading rack. Phillips 66 crews would manage movement of the rail cars on-site, unloading 10 cars at a time. Emptied cars would be moved to a storage track. After unloading all cars, train crews would attach locomotives to the empty cars and depart to the west and then to the north and off the Phillips 66 property. Sufficient track would be available to store a second train should one arrive.

Workers would unload incoming unit trains and then disconnect the unloading pumps and prepare the railcars for departure. Phillips 66 would also refuel locomotives when the locomotives were used as switch engines to move the tank cars on and off the track. Locomotive refueling would be completed using a tank truck or a permanent refueling station with a fixed tank and fuel metering system. This process includes repressurizing the brakes using an air compressor system and replenishing the sand used by the locomotives for traction.

Coastal Access Route

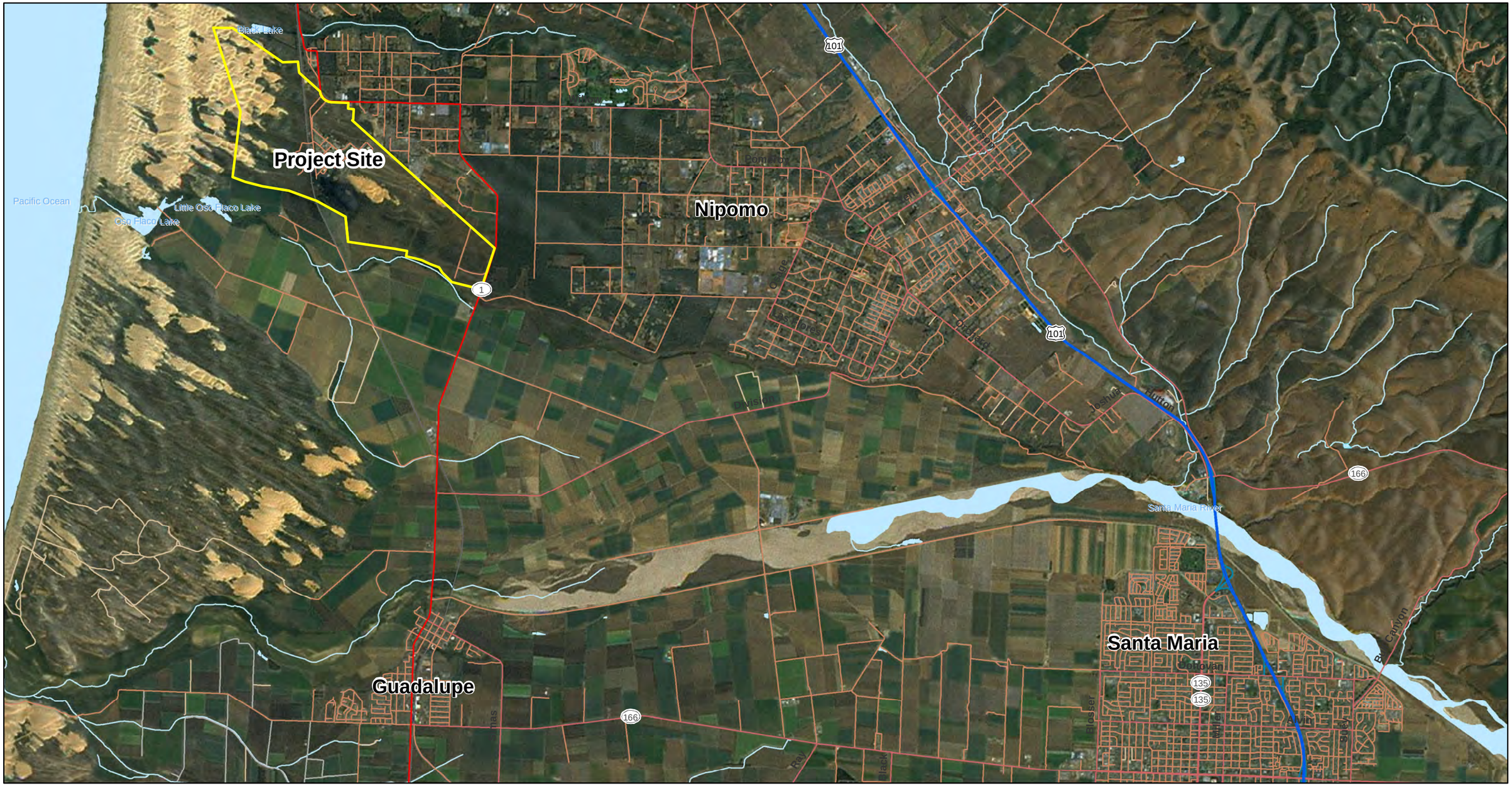
As part of a separate Development Plan/Coastal Development Permit initiated in 2008 ("Throughput Project"; Permit DRC2008-00146) and approved by the San Luis Obispo County Board of Supervisors on February 26, 2013, Phillips may be required to construct vertical public access from Highway 1 to their western property line consistent with the County requirement in Section 23.04.420 – Coastal Access Required, as part of the Rail Spur Project. The access would lead into the Oceano Dunes State Vehicular Recreation Area. The size and alignment of such access, as well as the appropriateness of the access, considering the existing environmental setting, public safety concerns, and the current land uses in the area is currently under consideration by the California Coastal Commission and the County.

The County has requested that a feasibility study be prepared to consider coastal access across the SMR. That document is currently in preparation. For purposes of the current project description for the rail spur project, a representative coastal access route has been developed in accordance with the alignment proposed in the County Conditions of Approval for the Throughput Project generally following existing roads on the SMR property. One alternative route has also been proposed to avoid areas previously mapped to support the endangered Nipomo Mesa lupine (Figure 8).

The conceptual routes considered are approximately 1.5 miles in length and 30-feet in width. The routes would require users to cross the active main railroad lines. It is assumed that the route would include a paved pedestrian and bicycle path. The access would not be intended to provide a new vehicle access route to the Oceano Dunes State Recreational Vehicles Area.

APPENDIX B

Figures



Legend

Property Boundary

NOTES:
1. Imagery accessed through ESRI World Imagery via ArcGIS Online Layer Packages by ESRI (12/1/2010) (c) 2010 Microsoft Corporation and its data suppliers accessed on 03/08/2013 through ArcGIS 10.

N

0 5,000 10,000

SCALE IN FEET

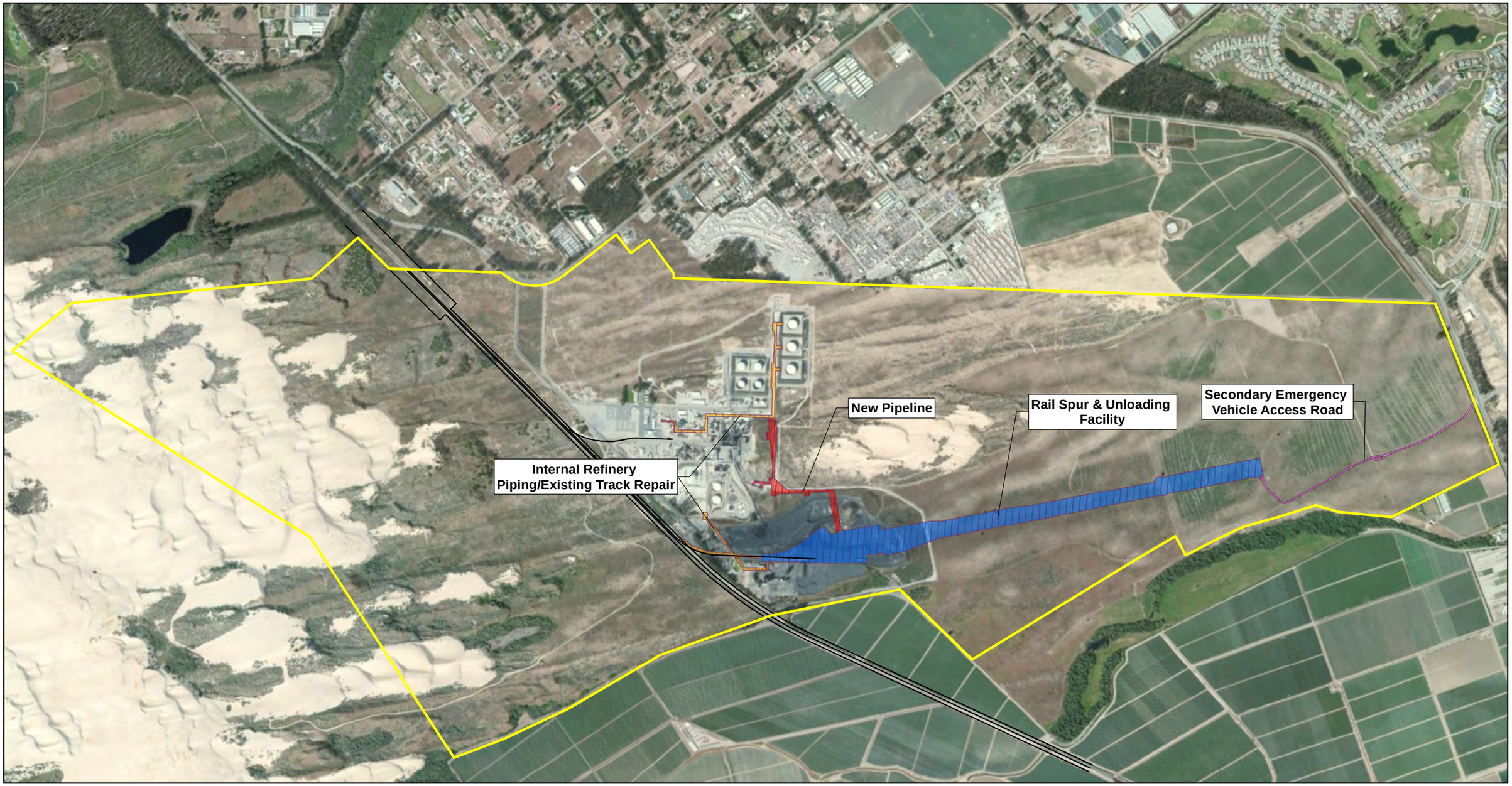
Phillips 66
Santa Maria Refinery Rail Project

PROJECT AREA

ARCADIS

FIGURE
1

I:\BCG_Misc\Phillips\GIS\Projects\060613\Fig 1 ProjectArea.mxd 6/14/2013 BGriffith
Coordinate System: NAD 1983 StatePlane California V FIPS 0405 Feet



Legend

- Property Boundary
- Existing Rail Line
- Limits of Disturbance

NOTES:
1. Imagery accessed through ESRI World Imagery via ArcGIS Online Layer Packages by ESRI (12/1/2010) (c) 2010 Microsoft Corporation and its data suppliers accessed on 03/08/2013 through ArcGIS 10.

N

0 1,255 2,510

SCALE IN FEET

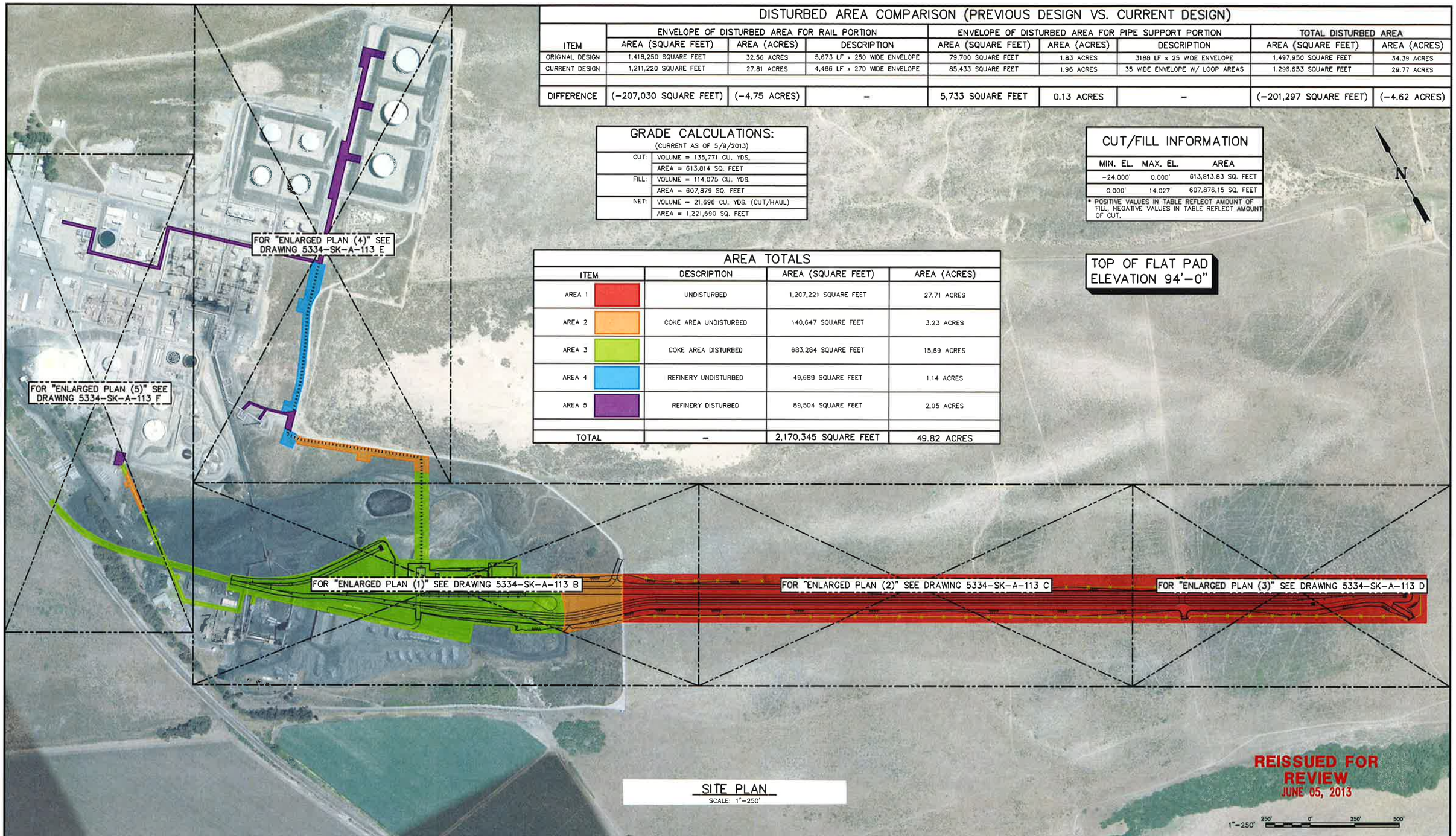
Phillips 66
Santa Maria Refinery Rail Project

PROPOSED PROJECT SITE ON PHILLIPS 66 PROPERTY

ARCADIS

FIGURE
2

I:\BCG_Misc\Phillips\GIS\Projects\060613\Fig 2 ProposedProjectSite_rev1.mxd 6/17/2013 BGriffith
Coordinate System: NAD 1983 StatePlane California V FIPS 0405 Feet



DISTURBED AREA COMPARISON (PREVIOUS DESIGN VS. CURRENT DESIGN)

ITEM	ENVELOPE OF DISTURBED AREA FOR RAIL PORTION			ENVELOPE OF DISTURBED AREA FOR PIPE SUPPORT PORTION			TOTAL DISTURBED AREA	
	AREA (SQUARE FEET)	AREA (ACRES)	DESCRIPTION	AREA (SQUARE FEET)	AREA (ACRES)	DESCRIPTION	AREA (SQUARE FEET)	AREA (ACRES)
ORIGINAL DESIGN	1,418,250 SQUARE FEET	32.56 ACRES	5,673 LF x 250 WIDE ENVELOPE	79,700 SQUARE FEET	1.83 ACRES	3188 LF x 25 WIDE ENVELOPE	1,497,950 SQUARE FEET	34.39 ACRES
CURRENT DESIGN	1,211,220 SQUARE FEET	27.81 ACRES	4,486 LF x 270 WIDE ENVELOPE	85,433 SQUARE FEET	1.96 ACRES	35 WIDE ENVELOPE W/ LOOP AREAS	1,296,653 SQUARE FEET	29.77 ACRES
DIFFERENCE	(-207,030 SQUARE FEET)	(-4.75 ACRES)	-	5,733 SQUARE FEET	0.13 ACRES	-	(-201,297 SQUARE FEET)	(-4.62 ACRES)

GRADE CALCULATIONS:

(CURRENT AS OF 5/9/2013)

CUT:	VOLUME = 135,771 CU. YDS.
	AREA = 613,814 SQ. FEET
FILL:	VOLUME = 114,075 CU. YDS.
	AREA = 607,879 SQ. FEET
NET:	VOLUME = 21,696 CU. YDS. (CUT/HAUL)
	AREA = 1,221,690 SQ. FEET

CUT/FILL INFORMATION

MIN. EL.	MAX. EL.	AREA
-24.000'	0.000'	613,813.83 SQ. FEET
0.000'	14.027'	607,876.15 SQ. FEET

* POSITIVE VALUES IN TABLE REFLECT AMOUNT OF FILL, NEGATIVE VALUES IN TABLE REFLECT AMOUNT OF CUT.

AREA TOTALS

ITEM	DESCRIPTION	AREA (SQUARE FEET)	AREA (ACRES)
AREA 1	UNDISTURBED	1,207,221 SQUARE FEET	27.71 ACRES
AREA 2	COKE AREA UNDISTURBED	140,647 SQUARE FEET	3.23 ACRES
AREA 3	COKE AREA DISTURBED	683,284 SQUARE FEET	15.69 ACRES
AREA 4	REFINERY UNDISTURBED	49,689 SQUARE FEET	1.14 ACRES
AREA 5	REFINERY DISTURBED	89,504 SQUARE FEET	2.05 ACRES
TOTAL	-	2,170,345 SQUARE FEET	49.82 ACRES

SITE PLAN

SCALE: 1"=250'

NUMBER	SH.	REFERENCE DRAWINGS

REV. NO.	DATE	REVISED (DESTROY ALL PRINTS BEARING EARLIER DATE)	REV. BY	CKD. BY	APP'D
A	5/28/13	ISSUED FOR REVIEW	-	-	-
B	6/3/13	REISSUED FOR REVIEW	-	-	-
C	6/4/13	REISSUED FOR REVIEW	-	-	-
D	6/5/13	REISSUED FOR REVIEW	-	-	-

APPROVED FOR CONSTRUCTION

A. F. E.	DATE	SIGNED

DRAWN BY -
CHECKED BY -
TRACED BY -
TRAC'G. CKD. -
APP'D -
APP'D -
SCALE AS NOTED
DATE 6/6/2013

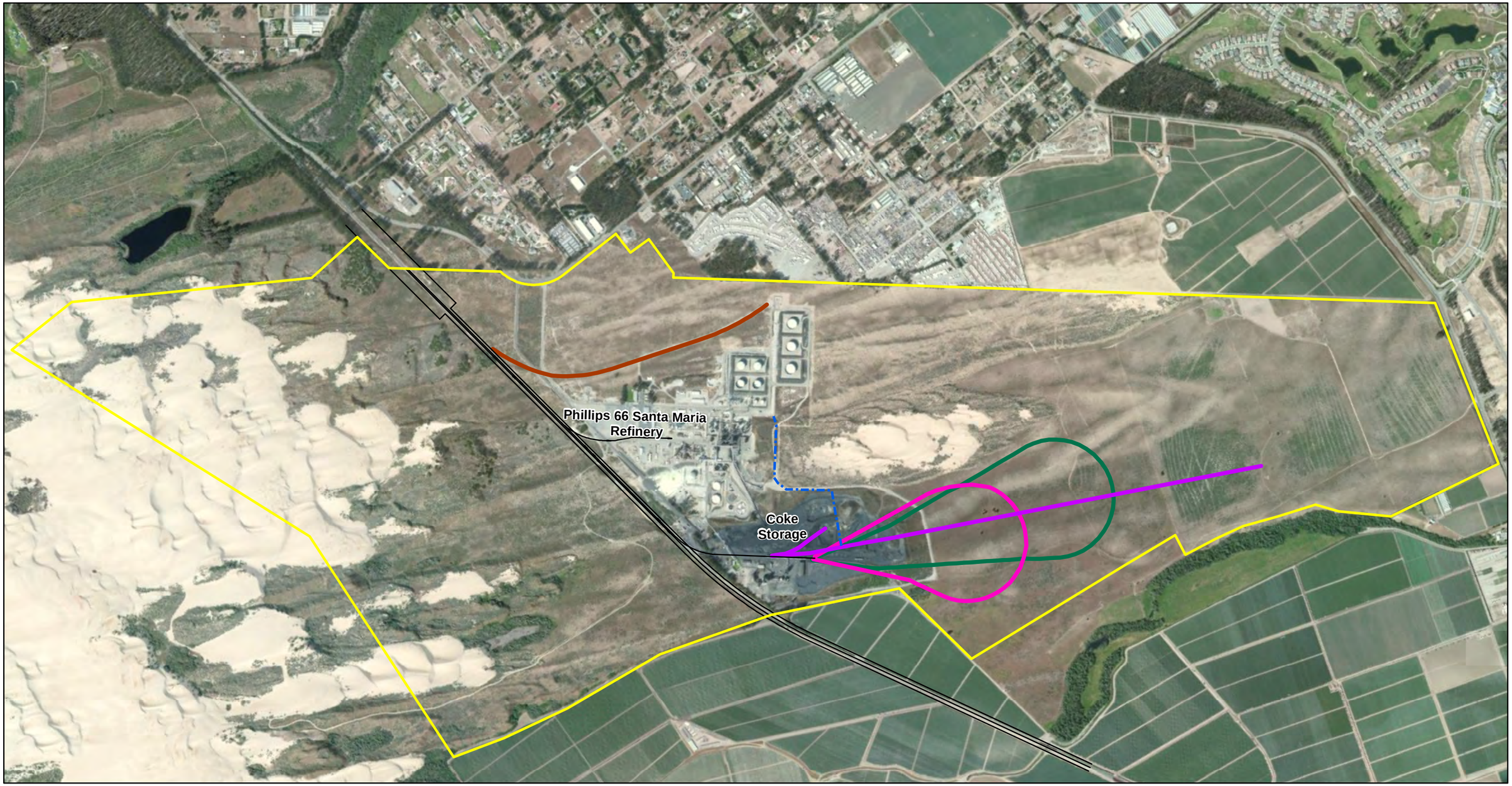
SPEC SERVICES
SPEC Services, Inc.
17101 Bushard Street
Fountain Valley, CA 92708
(714) 963-8077
5334_SK-A-113.dwg:(SK-A-113 A GRADING PLAN)

SANTA MARIA FACILITY
PHILLIPS 66 RAIL PROJECT
SITE PLAN

PHILLIPS 66 CO.
Santa Maria Facility

DRAWING NO. 5334-SK-A-113 A

SHEETS 1 OF 1



Legend

- Property Boundary
- Existing Rail Line
- Pipe Routing
- Northern Access Track
- Small Loop Track
- Large Loop Track
- Straight Track (Proposed Project)

NOTES:
1. Imagery accessed through ESRI World Imagery via ArcGIS Online Layer Packages by ESRI (12/1/2010) (c) 2010 Microsoft Corporation and its data suppliers accessed on 03/08/2013 through ArcGIS 10.

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0 1,255 2,510

SCALE IN FEET

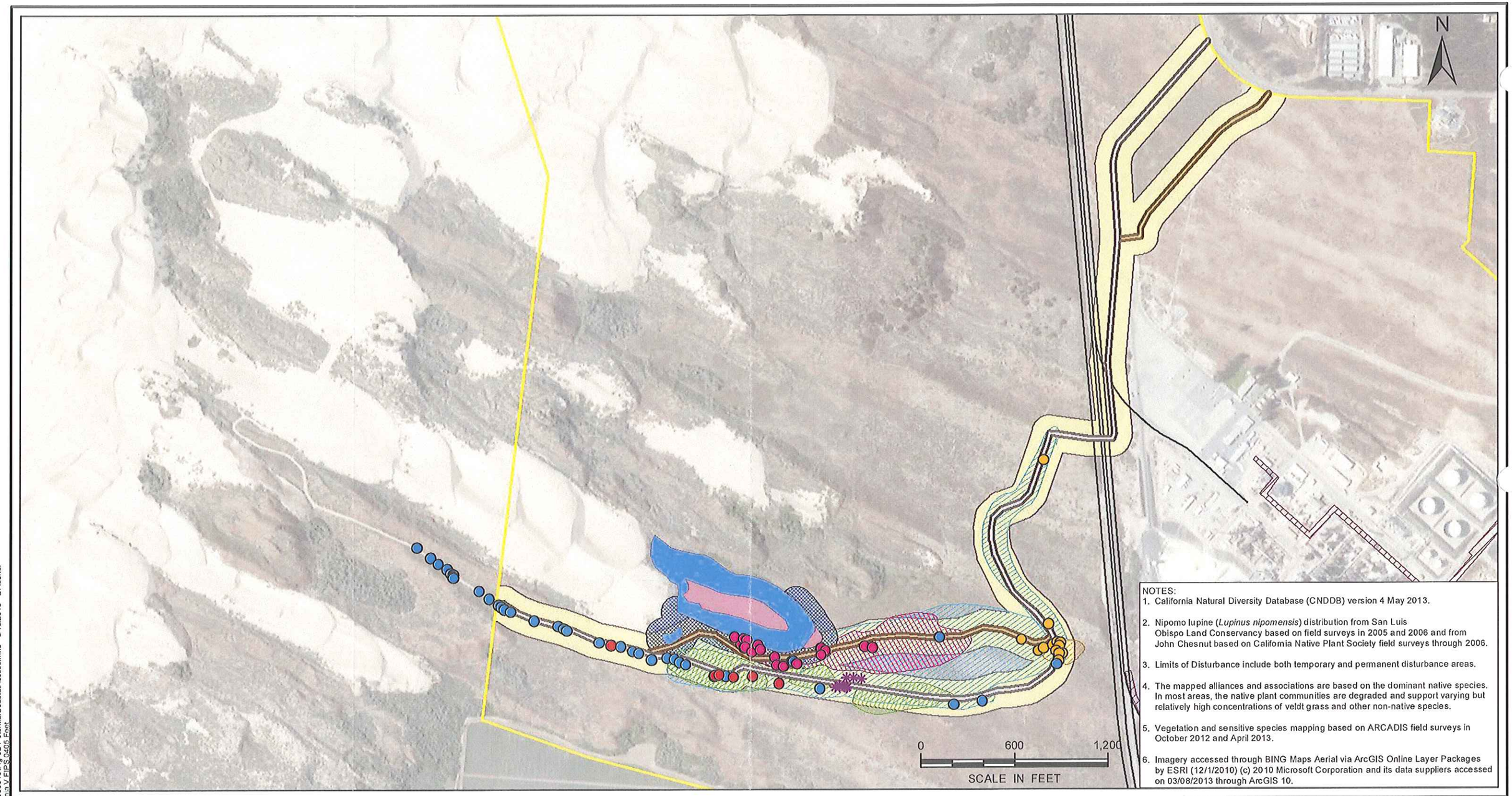
Phillips 66
Santa Maria Refinery Rail Project

TRACK LAYOUT ALTERNATIVES

ARCADIS

FIGURE
3

I:\BCG_Misc\Phillips\GIS\Projects\060613\Fig 3 TrackLayoutAlternatives.mxd 6/14/2013 BGriffith
Coordinate System: NAD 1983 StatePlane California V FIPS 0405 Feet



NOTES:

1. California Natural Diversity Database (CNDDB) version 4 May 2013.
2. Nipomo lupine (*Lupinus nipomensis*) distribution from San Luis Obispo Land Conservancy based on field surveys in 2005 and 2006 and from John Chesnut based on California Native Plant Society field surveys through 2006.
3. Limits of Disturbance include both temporary and permanent disturbance areas.
4. The mapped alliances and associations are based on the dominant native species. In most areas, the native plant communities are degraded and support varying but relatively high concentrations of veldt grass and other non-native species.
5. Vegetation and sensitive species mapping based on ARCADIS field surveys in October 2012 and April 2013.
6. Imagery accessed through BING Maps Aerial via ArcGIS Online Layer Packages by ESRI (12/1/2010) (c) 2010 Microsoft Corporation and its data suppliers accessed on 03/08/2013 through ArcGIS 10.

Property Boundary
Existing Rail Line
Limits of Disturbance
Potential Coastal Access Route A
Potential Coastal Access Route B

Sensitive Species Observed in June 2013

California Spineflower (*Mucronea californica*)
Sand almond (*Prunus fasciculata* var. *punctata*)
Blochman's Groundsel (*Senecio blochmaniae*)
Blochman's leafy daisy (*Erigeron blochmaniae*)
California Spineflower (*Mucronea californica*)
Sand almond(*Prunus fasciculata* var. *punctata*)
Blochman's Groundsel (*Senecio blochmaniae*)
Blochman's leafy daisy (*Erigeron blochmaniae*)
Crisp monardella (*Monardella undulata* ssp. *crispa*)
Nipomo Mesa Lupine (*Lupinus nipomoensis*)

Sensitive Habitats (2013)

Central Dune Scrub Dune-Heather and Silver Bush Lupine Association
Arroyo Willow Scrub (Wetland)
Freshwater Marsh - Coast Carex Herbaceous Alliance
100-ft Riparian Buffer

Phillips 66
Santa Maria Refinery Rail Project.

POTENTIAL COASTAL ACCESS ROUTES SURVEYED SENSITIVE RESOURCES

ARCADIS

FIGURE
8

H:\GISPROJECTS_ENV\Phillips66\GIS\Projects\060613\Fig 8B PotentialCoastalAccess.mxd 6/18/2013 DFischer
Coordinate System: NAD 1983 StatePlane California V FIPS 0405 Feet

APPENDIX C

Agency Referral Responses

100% Post Consumer Recycled Paper

SLO COUNTY apcd | Air Pollution Control District
San Luis Obispo County

May 28, 2013

Mr. Murry Wilson, Environmental Specialist
County of San Luis Obispo
Planning & Building Dept., Environmental Division
County Gov't Center #310
San Luis Obispo CA 93401

SUBJECT: APCD Comments Regarding the DRC2012-00095 PHILLIPS 66 , Santa Maria Refinery (SMR) Railroad Spur Initial Study / Mitigated Negative Declaration.

Dear Mr. Wilson,

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the above referenced project located at 2555 Willow Road in Arroyo Grande. The project as proposed will modify the existing rail spur at the refinery to allow for the delivery of crude oil to the SMR for processing.

The following are APCD comments that are pertinent to this project.

GENERAL COMMENTS

As a commenting agency in the California Environmental Quality Act (CEQA) review process for a project, the APCD assesses air pollution impacts from both the construction and operational phases of a project, with separate significant thresholds for each.

Based on the APCD preliminary review of land use application package it would appear the calculations and conclusions presented in the initial study and project description do not fully categorize all the emissions that will be associated with the project. A number of the emissions sources seem to have been omitted from the project emission calculations. These sources need to be addressed so that the full impacts of the project can be thoroughly assessed.

From the limited information provided in Appendix A (page 12) it also appears that only the emissions from rail hauling in the state of California were included in the calculations. All emissions associated with the project should be quantified whether they occur inside or outside the state of California. In addition, all assumptions, emission factors and supporting calculations (i.e. spreadsheets and CalEEMod reports) should be provided to APCD to enable staff to review and verify the calculations.

PROJECT SPECIFIC COMMENTS ON INITIAL STUDY

Page 5 – Mainline Turnout – The project description indicates that a modification or replacement of the mainline turnout many be required as part of this project. This work should be included in the construction calculations as a worst case scenario. It is not clear, from the data presented in Appendix A, if the turnout has been included in the construction calculations.

Page 6 – The project description indicates that carbon beds will be used in series to handle air/vapor from the unloading process. A description on how the filter medium will be regenerated and how the emissions from the regeneration process will be handled should be provided in the initial study. These emissions should also be included in the operational phase emission calculations.

Page 6 – It does not appear that the construction or operational phase emission calculations include the new boiler. These emissions should be included in the overall calculations.

On **page 7** of the project description it indicates there would be "no net increase in emissions" from the new boiler as the use of fuel gas to generate steam would occur through a diversion of the same fuel gas that normally is used to generate electricity. This raises two questions, first if electricity is not being generated on site – won't electricity need to be purchased from an offsite source? Offsite electrical generation would have emissions associated with it which should be addressed and included in the calculations as applicable. Secondly, how is the refinery going to guarantee that both boilers (one for steam and one for electricity) will not be operating simultaneously? There must be some mechanism in place to prevent both boilers from being used at the same time if "no net increase of emissions" is to be assumed. The applicant will need to provide an explanation acceptable to the APCD in order for these emissions to be excluded from the operational phase emission calculations. In addition, the construction of the boiler should be included in the construction phase emission calculations.

As indicated on **page 7** – 7,450 gallons/day of make-up water will be needed for the new steam boiler operations. Emissions from water pumping and handling should be included in the operational emission calculations for both criteria pollutants and greenhouse gases.

Page 7 - The project description indicates that aluminum dome roofs will be installed on two of the refineries existing crude oil tanks. The emissions from the construction of these two dome roofs should be included in the construction emissions since these roofs will be needed to support the handling of the heavier crudes. After the existing crude tanks are retrofitted with domed roofs will the tanks be placed on the refinery vapor recovery system? And if so, is that system adequate to handle the additional load or will modification to the vapor recovery system be required?

Page 8- Fire Protection and Safety System – it was not clear from the description if new fire water pump(s) will be part of this system or not. If so, emissions from routine maintenance and testing of the pump(s) should be included in the operational phase emission calculations.

Page 8 - Internal unpaved roadways should be maintained to prevent fugitive dust generation. Newly constructed roadways and parking areas should be paved or maintained to minimize dust. Fugitive dust from unpaved roadways should be included in operational phase emission calculations.

Page 10 – Parking areas and roadway leading to the new facility should be paved or treated to prevent fugitive dust.

Page 10 – Was the demolition and removal of 1300 feet of existing track included in the calculations? Offsite hauling for disposal or recycling of any materials should be included in the calculations including the final destination, number of trips and length of trips.

Page 11 – From the construction schedule it does not appear the construction calculations included the construction of the new boiler, dome roofs for the crude tanks, or a refueling station for the locomotive (page 12). In order to accurately assess emission impacts from construction, all emission sources need to be included in the construction calculations. As detailed on page 15, pursuant to CEQA evaluation, the effects must take into account the whole action involved, including direct, indirect and cumulative impacts of construction and operations.

Page 23 – Initial Study – Air Quality Section
Section (b) While it appears that the district fugitive dust threshold will not be exceeded, SLO County is non-attainment for State PM standard, so measures should be implemented to reduce dust to the extent feasible. Additional mitigation measures may be required once all construction emissions have been quantified.

The last paragraph under Section (b) states "*the project would generate an increase in operational air emissions from locomotives transporting crude oil in rail tankers along the new rail spur, unloading of crude oil from rail tankers at the facility and use of facility equipment including a new heating system, pumps, compressors and* ***tank trucks*****."**

- First it is not clear where the tank trucks would be used. Use of tank trucks was not discussed in the project description. This should be explained and associated emissions should be incorporated into the analysis.
- On page 7 the project description indicated there would be "no net increase" in emissions from the new boiler, here it indicates there would be an increase. Please explain.

Section (d) sensitive receptors – A screening health risk assessment should be completed for the proposed project.

Section (e) odors – The Refinery Odor Control Plan will need to be updated to include the proposed project. The Plan should be submitted to the APCD for review and approval prior to the issuance of any land use permits.

Appendix A

Construction Phase Emission Calculations – (applies for both criteria and GHG emissions)
Based on the data presented in Appendix A it is unclear if the following emission sources have been included in the construction calculations. If not, the calculations should be revised to include these sources. Until such time as these emissions have been quantified it is not possible to adequately

determine the construction impact from this project. Once corrected, the air quality analysis should be forwarded to the APCD for review.

Additional aspects to evaluate and include in the air quality analysis:

1. Offsite hauling of demolition materials including but not limited to old rails associated with replacement or modification to the mainline turnout.
2. New boiler
3. Power line extension
4. Dome roofs for the crude tanks
5. Refueling station for the locomotive
6. Boundary fence
7. Construction workers commute trips

- Calculations – District staff recommends that a spreadsheet be developed that details all the project components and emissions associated with each component. Table A-1 in Appendix A is a good start as it lists out certain activities (demolition, grading, soil transport, contraction pipeline, and construction rail line). However it clearly does not include all of the items listed above. This table should be expanded to show emission factors and associated emissions for each project component.

- Mitigation – even though the calculations do not show a threshold exceedance of fugitive dust, the Nipomo area is a non-attainment area for PM so measures should be implemented to reduce dust to the extent feasible.

- Mitigation – in addition to the mitigation measures outline in Appendix A, District staff recommends the following measure be included as condition of approval for this project.

    - NOA - <u>Asbestos / Naturally Occurring Asbestos</u>
      Naturally occurring asbestos (NOA) has been identified by the state Air Resources Board as a toxic air contaminant. Serpentine and ultramafic rocks are very common throughout California and may contain naturally occurring asbestos. The SLO County APCD has identified areas throughout the County where NOA may be present (see the APCD's 2009 CEQA Handbook, Technical Appendix 4.4). If the project site is located in a candidate area for Naturally Occurring Asbestos (NOA), the following requirements apply. Under the ARB Air Toxics Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations, prior to any construction activities at the site, the project proponent shall ensure that a geologic evaluation is conducted to determine if NOA is present within the area that will be disturbed. If NOA is not present, an exemption request must be filed with the APCD. If NOA is found at the site the applicant must comply with all requirements outlined in the Asbestos ATCM. This may include development of an Asbestos Dust Mitigation Plan and an Asbestos Health and Safety Program for approval by the APCD. If NOA is not present, an exemption request must be filed with the Air District. More information on NOA can be found at
      http://www.slocleanair.org/business/asbestos.php

- Demolition - Demolition of Asbestos Containing Materials
  Demolition activities can have potential negative air quality impacts, including issues surrounding proper handling, demolition, and disposal of asbestos containing material (ACM). Asbestos containing materials could be encountered during demolition or remodeling of existing buildings. Asbestos can also be found in utility pipes/pipelines (transite pipes or insulation on pipes). If building(s) are removed or renovated; or utility pipelines are scheduled for removal or relocation, this project may be subject to various regulatory jurisdictions, including the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (40CFR61, Subpart M - asbestos NESHAP). These requirements include, but are not limited to: 1) notification requirements to the APCD, 2) asbestos survey conducted by a Certified Asbestos Inspector, and, 3) applicable removal and disposal requirements of identified ACM. Please contact the APCD Enforcement Division at (805) 781-5912 for further information.

- Permits - Construction Permit Requirements
  Based on the information provided, we are unsure of the types of equipment that may be present during the project's construction phase. Portable equipment, 50 horsepower (hp) or greater, used during construction activities may require California statewide portable equipment registration (issued by the California Air Resources Board) or an APCD permit. Operational sources may also require APCD permits.

  The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive. For a more detailed listing, refer to the Technical Appendices, page 4-4, in the APCD's 2009 CEQA Handbook.

  - Power screens, conveyors, diesel engines, and/or crushers
  - Portable generators and equipment with engines that are 50 hp or greater
  - Electrical generation plants or the use of standby generator
  - Internal combustion engines
  - Rock and pavement crushing
  - Unconfined abrasive blasting operations
  - Tub grinders
  - Trommel screens
  - Portable plants (e.g. aggregate plant, asphalt batch plant, concrete batch plant, etc)

  To minimize potential delays, prior to the start of the project, please contact the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.

Operational Phase Emission Calculations – (applies for both criteria and GHG emissions)

- It is not clear from the data presented in Appendix A, if the calculations include the following operational emission sources. If not the calculations should be revised to include these sources. Until such time these emissions have been quantified it is not possible to adequately determine the operational impacts from the project.

    1. Emissions from the carbon beds when the beds are regenerated.
    2. Operation of the new boiler.
    3. Provide an accounting of all sources that were included in the fugitive emissions calculations.
    4. Pumping of water 7,450 gallons/day for boiler, page 7 (discussed above)
    5. Fugitive from unpaved roadways should be included in operational emission calculations.
    6. Locomotive – there is a category in Table A-7 for locomotive emissions. It is not clear if this includes operation while on the site. Both offsite and onsite operation should be included. Estimate of onsite emissions should be listed separately from offsite emissions.
    7. Emissions from the haul train over the entire length of the trip. Trip mileage and associated emission calculation should include round trips (to and from the crude source).
    8. Emissions from the train trips should be broken out to show emissions in San Luis Obispo County, and emission outside of San Luis Obispo County including emission **outside the state of California**.
    9. Emission from employee commute trips.
    10. Emissions from routine maintenance and testing of fire water pump(s) if new pump(s) are to be installed at the unloading rack.
    11. Offsite electric generator.
    12. Methane and other light hydrocarbons released from the crude when it is heated.

- It is not clear from the data present in table A-5 what is meant by the heating system. More specific information must be provided (size of the boiler, emission control equipment on the boiler etc.)

- There is not enough information provided to verity any of the operational phase emission calculations. As indicated above assumptions, emission factors and supporting calculations (i.e. spreadsheet) should be provided.

- The applicant will need to secure an Authority to Construct Permit from the APCD prior to the start of the project.

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at 805-781-4667.

Sincerely,

Melissa Guise

Melissa Guise
Air Quality Specialist

MAG/ksj

cc: Mr. Jim Anderson

Attachments

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DRC 2012-00095 Phillips 66 Company
5/13/2013

These are the Building Division Comments to be incorporated into the Conditions. Please call me if you have any questions.

Comments from Building Division:

1. All plans and engineering shall be prepared by a California Licensed Professional of Record unless exempted by the Business and Professions Code.

2. The project is subject to a construction permit as well as the newly adopted 2013 California Codes, effective date January 1, 2014.

3. The project will require a full soils report including addressing the design parameters of all building/structure foundations at the time of construction permit application submittal.

4. Any occupied structures (restrooms) are subject to the California State Title 24 accessibility / energy laws.

5. A grading permit is required and the project shall conform to the "National Pollutant Discharge Elimination System" storm water management program regulations (SWPPP).

6. Cal Fire shall evaluate the storage of hazardous materials. A fire sprinkler system maybe required for the structures. The sprinkler plans shall be submitted with a separate application for a separate fire sprinkler permit with the application for the structure(s). The application for the sprinkler system and any water tank storage required for the system shall be approved prior to issuance of the structure(s). Cal Fire requires that all commercial sprinkler systems be reviewed by a licensed fire protection engineer.

7. All on-site utilities serving existing structures shall be located on the correct parcel containing the structure served.

8. In the Land use process the case planner shall determine which components and what square footage of those components are subject to public facilities fees, suggest a spread sheet.

9. A pre-construction permit application submittal meeting is required with Stephen Hicks or his designee in the Building division (free of charge) to clarify how many permit's will this scope of work required and determine the timing of the permit review process and any other key issues.

by Elizabeth Szwabowski, Plans Examiner III

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ventura Fish and Wildlife Office
2493 Portola Road, Suite B
Ventura, California 93003

IN REPLY REFER TO:
08EVEN00-2013-CPA-0116

May 21, 2013

Murry Wilson
Planning and Building Department
County of San Luis Obispo
976 Osos Street
San Luis Obispo, CA 93408

Subject: Modification of Existing Railroad Spur at the Santa Maria Refinery, Phillips 66, Arroyo Grande, San Luis Obispo County, California (DRC2012-00095)

Dear Mr. Wilson:

We are responding to your request, received via email on May 7, 2013, for our comments on the subject project located at 2555 Willow Road, in the city of Arroyo Grande, California. Phillips 66 (applicant) proposes to modify the existing railroad spur at the Santa Maria Refinery to include an eastward extension, an unloading facility, a new transfer conveyance pipeline, and a restroom. The tracks and unloading facility would be designed to accommodate trains of up to 80 tank cars and associated locomotives in unit train or manifest train configurations. These trains would deliver crude oil to the refinery for processing within the current and allowable throughput limits. The unloaded crude oil would be transferred to the existing storage tanks via a new pipeline that would be constructed along an existing internal refinery road. The new rail spur lines would extend approximately 2,600 yards from the terminus of the current spur. The project will result in the disturbance of approximately 40 acres. We have substantial concerns regarding the impact of the proposed project on the federally-endangered Nipomo Mesa lupine (*Lupinus nipomensis*). We understand that the last remaining population of the species occurs on the subject property.

Surveys have not been conducted for Nipomo Mesa lupine; therefore, we are unable to properly evaluate the effects of the project. The significance of the project on Nipomo Mesa lupine cannot be determined without knowing whether the species occurs onsite. However, the application prematurely states that the project will have a less than significant impact on federally-listed species with mitigation measures incorporated. Furthermore, the application does not include any measures to avoid impacts to the species, should it occur onsite.

The region had a poor rainfall year and the species may currently persist only as a seed bank without producing above ground individuals. We recommend that a reference occurrence be visited prior to surveying the project site to determine if, and to what extent, the species is expressing itself with above ground individuals this year.

Nipomo Mesa lupine, a member of the legume family, is difficult to detect and has very long-lived seeds that can remain viable underground for many years. The seeds require scouring (e.g., scratching of the surface of the seed) in order for germination to occur. It is possible that a seed bank undetected by surveys will germinate during construction and grading activities associated with the proposed project.

In summary, we find the documents submitted to be lacking essential survey information for the presence of the federally-endangered Nipomo Mesa lupine. Surveys are needed to accurately evaluate and characterize the impacts the project, as proposed, would have on the species. Protective measures should be developed to avoid all project-related impacts to Nipomo Mesa lupine. We are willing and available to work with you to achieve this goal. In addition, we recommend that you contact the California Department of Fish and Wildlife because Nipomo Mesa lupine is also listed by the State of California as endangered.

Sincerely,

Diane K. Noda

Diane Noda
Field Supervisor

cc:
Brandon Sanderson, California Department of Fish and Wildlife
Kami Griffin, County of San Luis Obispo

heal slo
HEALTHY EATING ACTIVE LIVING
San Luis Obispo County

June 10, 2013

TO: San Luis Obispo County Planning Commission

FROM: HEAL-SLO - Healthy Communities Work Group

RE: DRC2012-00095 – Phillips 66 Company

The Healthy Communities work group has reviewed the proposal to modify the existing railroad spur at the Santa Maria Refinery to include an eastward extension, an unloading facility, a new transfer conveyance, and a restroom. This is a comprehensive proposal that brought up many questions. The health impact of this proposal is dependent on the answers to these questions.

Phillips 66 plans to receive five unit trains per week, each unit incorporating 80 cars and 3 diesel engines. It is important to remember that train traffic would increase along the entire route, not just in the immediate vicinity of the plant.

- What is the potential for traffic and pedestrian accidents at train crossings, as a result of the increased train traffic in the County?
- The noise study looked at residences close to the facility, but what about increased noise along the rest of the route?
- Would increased train traffic cause air quality issues? Would the loading/unloading cause air quality issues?
- The plant appears to have developed a comprehensive fire safety plan for incidents within the plant, but what if there were accidents, spills or a train derailing along the rest of the route? Is there a general safety plan in place to deal with those types of issues?
- How would neighbors to the plant be advised in case of an accident at the plant? Have neighbors been consulted about this proposal?
- What is the capacity of the plant to handle site safety issues for workers?

Thank you for the opportunity to review this project. We will monitor this proposal as it moves forward in the planning process.

COALITION PARTNERS:

Arroyo Grande Community Hospital
Boys and Girls Club – South County
Cal Poly University
Art and Design Department
Center for Sustainability
Food Science & Nutrition Department
Kinesiology Department
Landscape Architecture Department
STRIDE
CenCal Health
Central Coast Ag Network
City of San Luis Obispo
Parks and Recreation Department
Community Action Partnership of SLO County, Inc.
Dairy Council of California
Diringer Associates
Equilibrium Fitness
First 5 Commission of SLO
French Hospital Medical Center
Juiciful Creative Consulting
Kennedy Club Fitness
Lillian Larsen Elementary School
Living the Run
Lucia Mar Unified School District
Network for a Healthy California – Gold Coast Region
North County Farmers Market Assoc.
Oceano Community Center
Paso Robles Library & Recreation Services
Rideshare – Safe Routes to School
San Luis Sports Therapy
San Miguel Joint Unified School District
San Miguel Resource Connection
SLO Bicycle Coalition
SLO Council of Governments
SLO County Board of Supervisors
SLO County Community Foundation
SLO County Health Commission
SLO County Office of Education
SLO County Parks
SLO County Planning and Building
SLO County Public Health
SLO Food Bank Coalition
UC Cooperative Extension
YMCA of SLO County

HEAL-SLO is the SLO County obesity prevention coalition and its mission is to increase healthy eating and regular physical activity among County residents through policy, behavioral and environmental changes. In carrying out that mission, a subcommittee called the Healthy Communities Work Group provides responses to Planning staff, from a healthy community's perspective, on proposed land development projects, ordinance and general plan amendments, and special projects.