



Cool Davis

Empowering Citizens for Climate Action

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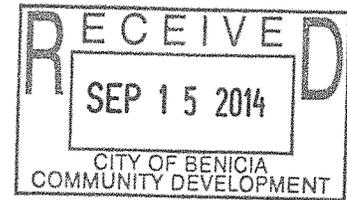
Cool Davis Mission

To inspire our community to reduce greenhouse gas emissions, adapt to a changing climate, & improve the quality of life for all.

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September 10, 2014

Amy Million, Principal Planner
Community Development Department
amillion@ci.benicia.ca.us



Re: Comments on the Valero Crude-By-Rail Project DEIR

Dear Ms. Million,

Please add these comments to the public legal record on Valero's Crude-By-Rail Project and incorporate them as part of the review of its DEIR, which proposes the shipment of crude oil by trains which would pass through the City of Davis.

Cool Davis is a non-profit organization whose mission is to inspire our community to reduce greenhouse gas (ghg) emissions, to adapt to a changing climate, and to improve the quality of life for all! We work to implement aspects of the Davis Climate Action and Adaptation Plan related to home energy efficiency, transportation, and consumption.

The various Air Quality Management Districts have written comments already addressing the need for the DEIR to offer mitigations to offset the admitted emissions from the increased train traffic. This is helpful as far as it goes, but the proposed mitigations are limited to the immediate air pollution impacts.

Cool Davis believes there are several more impacts to be considered. First, the two daily trains that deliver crude to Benicia will be returning on the same route each day to be filled again with a new delivery of crude oil. The mitigations must cover the ghg emissions for the round trip for each train each day.

Second, the impacts of the trains are cumulative as more trains travel on the tracks. By mid-September, 2014 – in other words as soon as next week – San Luis Obispo County expects to release their DEIR for recirculation on the Santa Maria Refinery Rail Spur Project that will mean an additional train per day moving through Davis. This means the ghg emissions will be even higher, exacerbating the pollution problems already increased by the Valero trains. The mitigation for the Valero train emissions must take into account the round trip of the Valero train in the context of the existing air quality and the compromised air quality in the near future should the Santa Maria project be approved.

Third, CEQA specifically addresses impacts for all of California. The DEIR for the Valero project has chosen to focus on train ghg emissions from Roseville to Benicia rather than from the borders of California to Benicia. At a minimum, the total ghg emissions beginning when the trains cross the border into California must

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be recognized and evaluated.

To be complete, the DEIR should consider the full life-cycle impact of the fossil fuel footprint from the extraction process to the transportation to the final consumption which all contribute to local pollution and global climate change. Singling out only the greenhouse gas emissions as the train passes through town is a thin slice of the total lifecycle and its impact. CEQA requires a more cumulative and holistic approach.

Under AB32, the California Global Warming Solutions Act, California has chosen a set of goals for greenhouse gas reduction. According to the California Energy Commission, in the last year California significantly reduced its consumption of oil through conservation measures such as more efficient vehicles and more trips by transit, biking and walking. We have proven we can reduce our footprint!

Generally, mitigations are direct offsets related to local pollution. However, since ghg emissions do contribute to global climate changes that affect California communities as well as others around world, the mitigation should also provide global benefits. Cool Davis proposes that creative mitigations such as funding toward the transition to electric and hybrid vehicles, including incentives and behavioral approaches to encourage households to purchase electric vehicles and to encourage multi-family residences to install electric vehicle charging devices for their residents. Another example would be funding to local governments for conversions to “complete streets” to encourage more biking and walking. Cool Davis would be happy to work with the project proponents on possible mitigations to effectively reduce ghg emissions to best fit our community, the region, and the world. The mitigations must reduce ghg emissions sufficiently to counterbalance the emissions added to the community by the daily trains.

Unfortunately, the sudden and substantial increase in crude-by-rail into our state takes us backwards, increasing our ghg emissions into the atmosphere and slowing our necessary conversion to renewable energy and low-carbon fuels as we confront climate change. This DEIR must examine how the increase in oil trains will affect our climate goals and propose appropriate mitigations if it finds that the incoming crude-by-rail makes it harder to reach those goals. At stake is a livable planet for all living beings, including our children and their children. The best mitigation may be to stop importing high carbon intensity and volatile crude oil by rail and instead put our efforts into supporting passenger rail and other measures more consistent with a safe climate. The “No Project” option deserves serious consideration.

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Thank you for taking into account the above concerns regarding greenhouse gas emissions for the Valero Crude-by-rail Project. We trust the Benicia Planning Commission will agree it is important to extend the analysis of the present DEIR and we look forward to the recirculation of the DEIR with new analysis and, if necessary, meaningful mitigations.

Sincerely,

Bill Heinicke, President of Cool Davis Foundation Board of Directors
Davis, California
info@cooldavis.org

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