

Comments letter sent via Baykeeper's action alert by our supporters

To: Barry Young, Senior Advanced Projects Advisor, Bay Area Air Quality Management District

Dear Mr. Young:

Thank you for the opportunity to submit these comments concerning Phillips 66's marine terminal operations expansion. I'm deeply concerned about the impacts to the San Francisco Bay Area's air and water quality that could result from the expansion of the refinery's marine terminal operations, especially the proposal to increase the number of oil tankers per year from 59 to 135. The increased tankers are likely to be carrying tar sands oil from the proposed Kinder Morgan Transmountain Expansion Project.

I respectfully request that your environmental review include the following important considerations:

- The increased cumulative and incremental risk of oil spills from the proposed expansion in marine terminal operations;
- The worst case spill scenarios and all related environmental impacts both to San Francisco Bay and along the length of the entire oil transport route, as well as to the Bay Area's air quality;
- An evaluation of the type of oil proposed for transport and any environmental impacts a feedstock conversion from California-produced crude oil to Canadian tar sands-produced oil would have on refinery emissions and effluent.
- The unique risks associated with non-floating oils, which can cause severe air quality impacts and can decimate the bottom benthic layer of the Bay, which is home to many organisms critical to the Bay's food chain;
- The climate impacts of this project, including a lifecycle analysis for the oil proposed for transport to California, which could be significant and reverse California's progress towards reducing global climate impacts; and
- The impacts to oil tanker transport in the Bay by the U.S. Army Corps of Engineers' recent determination that the Pinole Shoal Channel will be on a reduced dredging schedule.

Your rigorous review is especially warranted in light of Phillips 66's September 20, 2016 oil spill into San Francisco Bay. That spill resulted in harm to the Bay from two large oil sheens, sent more than 100 Vallejo residents to the hospital, prompted more than 1,400 odor complaints, and led Vallejo officials to issue a shelter-in-place order for nearby residents.

Thank you for carefully considering these impacts to the Bay's water quality and the Bay Area's air quality and ensuring that our waters and air are strongly protected.

Sincerely,

(Baykeeper supporter)