

# Coastal San Luis Resource Conservation District

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November 17, 2014

CA Public Utility Commission  
CPUC Public Advisor  
505 Van Ness Avenue, Room 2103  
San Francisco, CA 94102

Dear CPUC Public Advisor;

RE: California Public Utilities Commission Railroad Bridge Inspections

We have recently become aware of the California Public Utilities Commission's (CPUC) implementation of Railroad Bridge Inspections within the state. As a first step, the CPUC is completing a bridge inventory. Then, it will identify the most critical criteria and prioritize bridges for inspection. According to a Sacramento Bee news story, with two bridge inspectors to be deployed, "...it would take 50 years to check all 5,000 rail bridges." **This bridge should be a priority bridge for inspection in the near future.**



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FIGURE 3.7: Debris and drift accumulation upstream of the Union Pacific Railroad Bridge during the March 2001 flood. This photo illustrates the need to modify, raise, or strengthen this bridge if an alternative that recommends levee raising is pursued (e.g. Alternative 3c). If the levees are raised without modifications to this bridge, water would inundate the bridge with the potential for failure.

In San Luis Obispo County we have a Union Pacific Railroad (UPRR) bridge that spans the lower Arroyo Grande Creek near the town of Oceano. The creek is subject to flooding and impacts the bridge, which has condition issues. The bridge location is in the San Luis Obispo county Flood Control Zone 1/1A. At the present time, the creek has a 5 year flood level

capacity. Photographs documenting the flood stage impact and bridge condition are attached. The location coordinates for the bridge are 35°05'43.64N by 120°36'31.30W

There is the potential for an increase in shipments of crude oil that will cross this bridge. A revised Draft Environmental Impact Report (DEIR) for a Phillips 66 Company Rail Spur Extension Project at its Santa Maria Refinery on the Nipomo Mesa is currently being circulated by the County of San Luis Obispo for public review and comment. The refinery is proposing to take delivery of and process crude oil. The comment period closes November 24, 2014. Should the project receive approval, the timeline for build out is unknown.

Information provided by the DEIR for the transport of crude oil:

- 5 unit trains per week, an annual maximum number of 250 trains per year.
- Crude oil shipped in non-jacketed CPC-1232 tank cars. Per car capacity is 31,808 gallons, a crude oil weight limit of 210,700 pounds, and is approximately 90 feet in length.
- The proposed unit train configuration would be 3 locomotives, 2 buffer cars, and 80 railcars, each carrying between 26,076 and 28,105 gallons of crude oil. A unit train would be between 1.25 to 1.5 miles in length.

Our concern is the performance of the UPRR bridge over lower Arroyo Grande Creek during a severe inclement weather event and the passage of a crude oil train. The age and condition of the bridge; the limited creek flow capacity; the proximity to the community of Oceano and the South County Sanitation wastewater treatment plant; a prime agricultural producing valley; and, a creek with several endangered species warrants consideration of an inspection early in the CPUC process.

We appreciate your consideration and making these inspections a priority.

Sincerely,



Jackie Crabb, District Manager  
Coastal San Luis Resource Conservation District

cc: Assemblyman Katcho Achadjian, 35<sup>th</sup> District



