



Northwest San Pedro Neighborhood Council

"Your Community Voice"

September 12, 2011

Carmen Trutanich
City Attorney
200 N Main St., 8th Floor
Los Angeles, California 90012

Diana Nave
President

John Mavar
Vice President

Craig Goldfarb
Treasurer

Cynthia Gonyea
Secretary

RE: RANCHO HOLDING'S USE OF RAIL LINE OVER CITY PROPERTY

Dear Mr. Trutanich:

Our community and our Council have long been concerned about the butane storage facility on North Gaffey Street in San Pedro that is currently owned by Rancho Holdings. Our concerns have increased because of the recent incident of the LPG rail car fire in Northern California. The intensity of that situation and evacuation of people over a mile away to avoid risks from a minimal spill has confirmed our anxiety regarding the enormous Rancho facility in San Pedro. We would like your assistance in safeguarding our community.

For over 30 years and through several changes in ownership, a number of discretionary approvals have occurred without the required environmental assessment. In 2005, the Port of LA refused to renew the facility's wharf lease, dramatically altering the LPG business operation and forcing 100% of the transportation of the hazardous gas by truck and rail. Under CEQA law and the California Code of Regulations, this alteration should have triggered a new and complete Environmental Review Process. That never happened. Before that, pipelines connecting this facility with the Valero and British Petroleum refineries were installed, also without an environmental assessment. The Port and City of Los Angeles have jurisdiction over the rail line that Rancho uses to transport its products.

It appears that this facility missed an important step during these changes in operation by not conducting environmental reviews. We are requesting that your office confirm whether an environmental review is required to reflect the current operation and adequately meet the legal requirements of CEQA law. If a new environmental review is required, what is the next step? We would appreciate this information within thirty days.

By doing this, you will have asserted your authority as City Attorney in your duty to properly protect the residents of our City. This is an urgent matter that demands your immediate action. We look to your leadership to guarantee the safety and well being of our public.

Sincerely,

Diana Nave, President

