

Ray Regalado, President
Laurie Jacobs, Vice President
Melanie Labrecque, Treasurer
Cynthia Gonyea, Secretary



Certified Neighborhood Council
Certification Date 02-12-02
NW San Pedro Neighborhood Council
638 S. Beacon Street, Box 688
San Pedro, CA 90731

TELEPHONE: (310) 918-8650 • WEBSITE: NWSanPedro.org • E-MAIL: BOARD@NWSanPedro.org

July 19, 2018

Acting Executive Director Meghan Reese
Chair Gisele L. Fong and the Board of Directors
Harbor Community Benefit Foundation
302 W. 5th Street, Suite 300
San Pedro, CA 90731

Dear HBCF Staff & Board,

The Harbor Benefit Community Foundation (HCBF) sponsored a 2017 Harbor Community Off Port Land Use Study. The study was conducted by the consulting firm Rami & Associates. Its purpose was to: (1) explore and document off-Port community impacts in San Pedro and Wilmington, (2) explore the relationship between these impacts with the Port of Los Angeles (POLA) operations and related activities; and (3) inform future activities of the HCBF and community groups.

In Chapter 4 of the sponsored Land Use Study the consultant identified various hazardous and polluting land uses including the Rancho LPG facility in north San Pedro. Quoting from the study regarding the facility:

“Interviewees reported that the facility uses a rail spur to store and move the highly volatile and flammable liquefied gas to and from the Port within proximity to residential areas and commercial districts. A long-time San Pedro resident described the danger associated with storing highly flammable butane on rail cars near residential areas: “These rail cars are filled with explosive gas and fuel...these rail cars are basically stored on train tracks that are close to residents and schools. Rancho...uses its tracks and cars as a secondary storage facility.”¹

However, the study did not identify the rail transport routes of Liquid Petroleum Gas (LPG) from the Rancho LPG facility, for example, along the North Gaffey rail spur, or assess the rail transport routes of LPG and other hazardous materials² from other facilities over Port-owned rail lines.

The study’s purpose was not to evaluate the risk posed by such transport. We do know, however, that a standard rail tank car holds 30,000 gallons of LPG. Should one tank car derail, spill its contents, and explode after encountering an ignition source, in a worst-case scenario, the blast radius would be 0.5 miles causing both physical injury, even death, and material damage over a large area.

On September 21, 2017 the Port of Los Angeles communicated that the California Coastal Commission does not mandate that the Port, in its Risk Management Plan, assess the risk posed by the rail transport of hazardous material on Port-owned rail lines due to their transitory nature. However, this does not obviate the risk posed by such transport both within the Port and off-Port. This provides an opportunity for the HCBF to commission such a comprehensive study to assess the

¹ See page 151 of Land Use Study.

² See EPA listings of hazardous material in Appendix A: 40 CFR Part 68.

risks such transport poses not only to the Port but also to San Pedro, Wilmington, and other nearby communities through which LPG and other hazardous materials are transported by rail.

We have enclosed two videos of a 2008 propane explosion in Toronto where liquid propane was being illegally transferred directly from one truck to another:

https://www.youtube.com/watch?v=bJuRQPr0_jo
<https://www.youtube.com/watch?v=TVBLL4p4pPM>

There was also an incident in Lincoln, CA on August 24, 2011 where a rail tank carrying 29,000 gallons of liquid propane caught fire that required a one-mile danger zone, mandatory evacuation and a state of emergency declaration:

<https://www.youtube.com/watch?v=qH421AWPyms>
<https://www.cbsnews.com/news/burning-rail-car-a-small-thermal-nuclear-bomb/>

Therefore, the Northwest San Pedro Neighborhood Council requests that the HBCF commission such a study in accordance with its MOU to properly assess such a disaster occurring when 30,000-gallon rail tank cars are involved adjacent to the neighboring communities of San Pedro and Wilmington. This is an environmental justice issue of the first order.

Sincerely,



Ray Regalado, President
On behalf of the Northwest San Pedro Neighborhood Council

CC:

Central San Pedro Neighborhood Council, 1840 S. Gaffey Street, Box 212, San Pedro, CA 90731
Coastal San Pedro Neighborhood Council, 1840 S. Gaffey Street, Box 34, San Pedro, CA 90731
Harbor City, P.O. Box 325, Harbor City, CA 90710
Harbor Gateway North Neighborhood Council, P.O. Box 3723, Gardena, CA 90247
Harbor Gateway South Neighborhood Council, 20911 S. Denker Ave, Torrance, CA 90501
Wilmington Neighborhood Council, 544 N Avalon Blvd, Wilmington, CA 90744
San Pedro & Peninsula Homeowners Coalition, PO Box 1106, San Pedro, CA 90733
Los Angeles Councilman Joe Buscaino, 200 N. Spring Street, Room 410, Los Angeles, CA 90012
councilmember.buscaino@lacity.org
Ryan Ferguson, Field Deputy for San Pedro ryan.ferguson@lacity.org
Los Angeles Mayor Eric Garcetti, 200 N. Spring Street, Room 303, Los Angeles, CA 90012
mayor.garcetti@lacity.org
Manny Lopez, Senior Area Representative, Mayor's Office of Public Engagement
emmanuelle.lopez@lacity.org
The Honorable Nanette Barragan, United States Representative, 302 W. Fifth Street, Suite 201, San Pedro, CA 90731 cc Morgan.Roth@mail.house.gov
Port of Los Angeles, Gene Seroka, Executive Director GSeroka@portla.org
Thomas Gazsi, Deputy ED & Chief of Public Safety and Emergency Management TGazsi@portla.org
Christopher Cannon, Director of Environmental Management CCannon@portla.org
David Libatique, Deputy ED, Stakeholder Engagement DLibatique@portla.org