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October 4, 2017

Anna Erneholm, Chair  
Environmental and Sustainability Committee  
Coastal San Pedro Neighborhood Council  
1840 S. Gaffey Street, Box34  
San Pedro, CA 90731

**RE: Port of Los Angeles Risk Management Plan; Rancho LPG LLC**

Dear Ms. Erneholm:

Thank you for your letter of September 14, 2017, requesting that the Port of Los Angeles (POLA), in its next Risk Management Plan (RMP) update, include an analysis of the risk posed by the transportation of liquid propane and butane along the Gaffey rail tracks, and provide that information to the community.

Under the California Coastal Act, development activities within the Coastal Zone generally require a coastal development permit to ensure that the activity is consistent with the policies of the Coastal Act. A certified port master plan transfers coastal development permit jurisdiction relative to port development from the Coastal Commission to a port authority. The RMP, as part of the Port Master Plan, exists to help govern the issuance of coastal development permits, as is stated in Section 8.2 of the POLA Port Master Plan:

The Risk Management Plan is considered to be adjunctive to all existing and future local, state, and federal laws and agency regulations. Application of the plan is primarily for the establishment of policies, processes, and procedures and conditions that shall be required for issuance of Coastal Development Permits by the Board.

The Federal Railroad Administration governs railroad safety, and rail transportation is under the jurisdiction of the Surface Transportation Board. In addition, there are at least 15 other federal, state, and local agencies that regulate the facility using the Gaffey rail tracks.

The Port's RMP is designed to govern the siting of structures requiring a coastal development permit, not to regulate moving cargo that is already regulated by more appropriate authorities. Because the RMP fulfills the purpose mandated by the Coastal Commission, and extending its analysis beyond that purpose would either duplicate or contradict other local, state, and federal laws and agency regulations that already govern areas outside the Port's Coastal Commission mandate, the Port does not intend to change its RMP.

Ms. Anna Erneholm, Chair  
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Sincerely,



EUGENE D. SEROKA  
Executive Director

cc: Michael DiBernardo, Deputy Executive Director  
Antonio V. Gioiello, Deputy Executive Director  
Janna B. Sidley, General Counsel  
Justin Houterman, Deputy City Attorney  
Dave Walsh, Director of Engineering  
Jack Hedge, Director of Cargo & Industrial Real Estate  
Michael Keenan, Director of Planning & Strategy  
Arley Baker, Senior Director of Communications  
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Augie Bezmalinovich, Community Affairs Advocate  
Cecilia Moreno, Community Affairs Advocate