



MEMORANDUM

TO: HONORABLE MAYOR & CITY COUNCIL MEMBERS
FROM: CAROLYNN PETRU, AICP, DEPUTY CITY MANAGER 
DATE: JUNE 2, 2015
SUBJECT: BORDER ISSUES STATUS REPORT
REVIEWED BY: DOUG WILLMORE, CITY MANAGER 
Project Manager: Kit Fox, AICP, Senior Administrative Analyst 

RECOMMENDATION

Receive and file the current report on the status of Border Issues.

EXECUTIVE SUMMARY

This month's report includes:

- An update on recent issues and events related to the Rancho LPG butane storage facility in Los Angeles (San Pedro);
- An update on the proposed 4-unit detached condominium project at 5883 Crest Road in Rolling Hills Estates;
- An update on the possible closure of the Defense Fuel Support Point San Pedro in Los Angeles (San Pedro); and,
- An update on proposed upgrades to the Palos Verdes Reservoir in Rolling Hills Estates.

BACKGROUND

The following is the regular bi-monthly report to the City Council on various "Border Issues" potentially affecting the residents of Rancho Palos Verdes. The complete text of the current status report is available for review on the City's website at:

<http://www.rpvca.gov/781/Border-Issues-Status-Report>

MEMORANDUM: Border Issues Status Report
June 2, 2015
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DISCUSSION

Current Border Issues

Rancho LPG Butane Storage Facility, Los Angeles (San Pedro)

In the past two (2) months, interested parties have continued to forward items regarding and related to the Rancho LPG facility via e-mail. Copies of these e-mails are attached to tonight's report. Staff will continue to monitor this project in future Border Issues reports.

5883 Crest Road Condominium Project, Rolling Hills Estates

The Rolling Hills Estates Planning Commission is scheduled to consider a slightly-revised version of this 4-unit project at the northeast corner of Crest and Highridge roads on Monday, June 1, 2015. Staff plans to attend this meeting and provide a further update as "Late Correspondence" at tonight's meeting.

Closure of Defense Fuel Support Point San Pedro, Los Angeles (San Pedro)

On April 1, 2015, Staff submitted the attached comments on the scope of the draft Environmental Assessment to the Navy. Staff will continue to monitor this project in future Border Issues reports.

Palos Verdes Reservoir Upgrades Project, Rolling Hills Estates

On April 10, 2015, Staff submitted the attached comments on the draft Mitigated Negative Declaration to the Metropolitan Water District. Staff will continue to monitor this project in future Border Issues reports.

New Border Issues

There are no new Border Issues on which to report at this time.

Attachments:

- E-mails related to the Rancho LPG facility (miscellaneous dates) (Page 3)
- Comments on Draft EA for DFSP San Pedro closure (dated 4/1/15) (Page 36)
- Comments on Draft MND for Palos Verdes Reservoir Upgrades Project (dated 4/10/15) (Page 38)

Kit Fox

From: Janet Gunter <arriane5@aol.com>
Sent: Monday, April 20, 2015 10:29 PM
To: darlenezaalney@aol.com; rreg55@hotmail.com; sarahnvaldez@gmail.com; jdimon77@yahoo.com; president@centralsanpedro.org; heather.hutt@sen.ca.gov; Lara.Larramendi@mail.house.gov; lisa.pinto@mail.house.gov; Kit Fox; jnm4ej@yahoo.com
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Subject: YouTube video Rancho LPG / Quest letter to Prof. Bea attempting to discreditResponse attached.
Attachments: Final Response+to+Ron+Conrow+by+Patchett+&+Bea.pdf

Remember one very important thing in reviewing these items.....No one on the side of the community is getting rich for their services to help in this situation. Their interests are pure and without financial gain. This includes world renown Professor Bob Bea. Motive on the side of our community representatives and all the experts volunteering their precious time to assist in this effort... is for one thing only.....the preservation of our lives, our ports and our communities. Any and all efforts are specifically aimed at preventing the catastrophe that is promised from our own recklessness in ever introducing this facility.

Paid consultants and lobbyists on the Rancho LPG /Plains All American Pipeline/ Plains Midstream Canada side... to defend and insulate their operation from scrutiny... are being paid many thousands or even hundreds of thousands of dollars for their intervention and services. This is something that should not be dismissed when investigating this matter. The consequences to be paid for ignoring the real truth of disaster potential here are going to be deadly.

Janet Gunter

See original letter sent to Professor Bea below.

 **Rancho LPG : Quest documents.pdf**

RANCHO

LPG Holdings LLC

April 09, 2015

Professor Robert G. Bea
60 Shuey Drive
Moraga, CA 94556

Subject: YouTube video about the Rancho LPG Facility in San Pedro, CA

Dear Professor Bea,

It has come to our attention that an inflammatory video trailer about the Rancho LPG facility located at 2110 North Gaffey Street in San Pedro, CA has been posted on YouTube titled *Sizzler for Masters of Disaster documentary*, (https://www.youtube.com/watch?v=TBGt_XKNpRk published March 15, 2015. We are concerned not only about the inflammatory nature of this video, but the fact the claims portrayed in the video by you and other commenters are lacking proven scientific information required to quantify exactly how the events described in the video can even happen.

As a result, we have commissioned Quest Consultants Inc., an engineering and process safety consulting firm with considerable worldwide experience in preparing such studies for Liquefied Petroleum Gas storage facilities, to review the video. Attached to this cover letter is Quest's review and findings regarding many of the outrageous and unquantified claims contained in the video.

As a respected forensic engineer, you should be able to provide the technical information to support your claims and those of the other video commenters. However, given past experiences with a prominent anti-Rancho opponent and video commenter, perhaps some of the comments by you may have been taken out of context or conceivably you are not aware of the YouTube video?

However, if you support the claims contained in the video, it should be quite simple for you to produce quantitative validation required to defend the positions of you and the other video commenters. The questions posed by Quest are straightforward (no gotcha questions) with the intention of scientifically explaining how an event can or cannot happen. The residents of San Pedro concerned about "public Safety" are deserving of facts based upon science and not rhetoric!

Sincerely,
Ron Conrow



Western LPG District Manger
Plains/Rancho LPG



April 7, 2015

Mr. Ronald Conrow
Rancho LPG Holdings, LLC
2110 North Gaffey Street
San Pedro, CA 90731

Re: Review of YouTube video
QCI Project 6774

Dear Mr. Conrow:

Quest Consultants Inc. (Quest) has completed a review of the miraclegirlproductions YouTube video titled *Sizzler for Masters of Disaster documentary*, published March 15, 2015. This video production (https://www.youtube.com/watch?v=TBGt_XKNpRk), henceforth referred to as the "Video", claims to describe and quantify the risks associated with the existing Rancho LPG Holdings, LLC (Rancho) facility located on North Gaffey Street in San Pedro, California. Quest's review of the Video addresses specific assertions made in the Video.

One of the principal speakers in the Video is Dr. Robert Bea. Dr. Bea is a retired University of California professor who worked in the Civil and Environmental Engineering Department. Dr. Bea is a respected forensic engineer who lends his voice and opinions to the Video.

There are several instances in the video where the comments presented by Dr. Bea may have been taken out of context. If this is the case, it will be straight-forward for Dr. Bea to identify the text as inaccurate and present the correct text. If this is not the case and Dr. Bea's comments are presented accurately in the Video, then Dr. Bea should be able to provide the technical information supporting his position. The text below taken directly from the video is show in italics.

Dr. Bea: *"Rancho is a very volatile, explosive, flammable gas."*

Dr. Bea: *"It also has very high risk because of the population and community that surrounds it."*

Dr. Bea: *"One of the tanks fails, within a three mile radius of that tank approximately a half a million people live. That's high risk."*

Dr. Bea: *"A large amount of propane in storage tanks that can be affected by strong earthquakes, ignited, that's a natural hazard, or human hazards; hubris, arrogance, greed, ignorance, and indolence is a disaster sooner or later."*

These four quotes, directly attributable to Dr. Bea will be discussed below. In addition to the quotes attributable to Dr. Bea, there are other quotes in the Video that require a review. Since Dr. Bea is a willing participant in the Video, he must agree with the other quotes presented in the Video. As each quote is presented and discussed, Dr. Bea should be asked whether he agrees with the quote as presented, or asked to correct the quote/information presented.

Other quotes in the video not attributed to Dr. Bea.

"There is no way to make these tanks safe."

"Imagine a blast at the Los Angeles harbor the size of fifty atomic bombs. A fire that cannot be put out with water that would trigger a cascading inferno igniting the multitude of storage tanks, petroleum factories, underground gas pipes, and everything in its path."

"We've got two ultrahazardous butane tanks containing over 25 million gallons and propane bullet tanks containing 300,000 gallons."

"Imagine how easily these tanks can be penetrated by a rocket launched grenade or a high-powered rifle."

"These tanks are a quarter-mile from the Los Angeles harbor and would make a high-value target for any terrorist."

"These tanks are built on sand banks called liquefaction areas. They stand 150 feet from a rupture zone with a potential 7.3 magnitude quake at hand."

"This propane and butane is stored above ground in refrigerated tanks and when the liquid is exposed to air, it immediately vaporizes to over 230 times its original volume. A leak from a rupture would float down the sand bank, into the storm drain, and spill out into the harbor."

"Butane and propane burn at temperatures hotter than 3,200 degrees and cannot be extinguished by water. No one, not even firefighters, can approach the blaze."

Quotes directly attributable to Dr. Bea

The following questions for Dr. Bea will focus on the physical state of the Rancho LPG facility, the products stored, and the application of these statements to this facility. The intent is to have Dr. Bea demonstrate his expertise in this area by either supporting one or more statements in a technical manner, or by disagreeing with one or more statements in a technical manner. Each of the quotes above will be analyzed individually.

The first quote by Dr. Bea is, *"Rancho is a very volatile, explosive, flammable gas."*

Clearly, the Rancho facility is not a gas, but the Rancho facility does store flammable liquefied gases (propane and butane in liquefied form). It would be beneficial to educate the listener that volatility only applies to liquids (or some solids that sublime like carbon dioxide) but not to gases. Other common materials are both volatile and flammable. Materials such as gasoline, diesel, kerosene, acetone, and ethyl alcohol, are all volatile liquids and are quite common and, once vaporized, will produce a flammable gas. If a material is flammable, it can be involved in an explosion. Thus, all the materials outlined above are also "explosive."

Dr. Bea, would you agree with the statement above? If not, what is technically wrong with this statement?

The second quote by Dr. Bea is, *"It also has very high risk because of the population and community that surrounds it."*

The statement is made in reference to Rancho being "high risk" due to the population around the facility. Since risk is a product of consequence and frequency, in order to make the statement above, Dr. Bea must have calculated both components of risk, as well as defined what "high" means in regard to risk. Since this exercise must have already been completed by Dr. Bea in order to make such a statement, it should be straight-forward to identify the following components that make Rancho a "high risk" facility.

Component 1 – Consequences used in the risk calculation.

- What accident scenarios were considered?
 - Which materials were released?
 - How were the materials released?
 - What were the initial conditions of the released materials?
- In terms of potential impact on the public, which single consequence affected the largest number of people?
 - How was this particular event modeled?
- What "cascading events" or domino events were evaluated?
- What models were used to quantify the extents of the potential hazards associated with the released materials?
- What hazard levels (e.g., kW/m² for fires) were used in the modeling of the potential hazards and what do they define (e.g., injury, mortality)?
 - Since people were the subject of the "high risk" statement, these hazard levels should be appropriate for people.
- Please describe how the presence or absence of people affected the consequence calculations.

Component 2 – Frequencies used in the risk calculation.

- For each originating release identified in Component 1, there is an associated frequency. For instance, if catastrophic failure of a refrigerated tank holding butane is one of the scenarios evaluated, then you must have calculated the event frequency of such a failure. If the total frequency of such an event is comprised of several independent frequencies, then you must have values for each independent event. For instance, for the catastrophic failure of a single refrigerated butane tank, you would have developed several independent frequencies, as a minimum. One failure mechanism referenced in the video is soil movement, please provide a list of independent events and the documentation supporting their failure frequencies.
 - Catastrophic failure due to soil movement.
 - Catastrophic failure due to ...
 - Catastrophic failure due to ...
- The same questions can be applied to the other vessels in the Rancho facility. Please provide the supporting failure frequency information for each of the following vessels.
 - Horizontal pressure vessels (liquefied propane and butane bullets)
 - Railcars
 - Tank trucks
- In the video, "cascading events" or domino events are referenced. In order to associate a risk to a cascading event, you must have developed the frequencies of the events that, when combined, provide a final frequency of the event caused as a result of cascading events. What cascading events did you develop a frequency for, and how were they developed numerically?

- For each initiating event frequency (e.g., frequency of pipe rupture), there are a number of distributions (e.g., hole size as a function of pipe diameter), conditional probabilities (e.g., immediate, delayed, or no ignition), as well weather dependencies (e.g., low winds blowing from the northwest during stability D conditions). Please describe the methodology used to incorporate this information. An example calculation would be helpful.
- How was the presence or absence of people around the Rancho facility accounted for in the frequency calculations?

Component 3 – Level of risk.

- According to your risk calculations, what are the numerical values of risk calculated around the Rancho facility?
- What numerical value of risk is identified as “high?”
- What risk criteria are you referencing?
 - The risk criteria for individual risk
 - The risk criteria for societal risk
- Do these risk criteria define “high risk,” and if so how?

The third quote by Dr. Bea is *“One of the tanks fails, within a three mile radius of that tank approximately a half a million people live. That’s high risk.”*

- What does the “one tank fails” have to do with “within a three mile radius of that tank approximately a half a million people live?”
 - Did you develop an impact from the Rancho facility that could produce a hazard zone that extends three miles from the Rancho facility?
 - If so, what accident scenario was it?
 - If so, what hazard endpoint (e.g., kW/m²) was used to define the impact?
 - If so, what does this hazard endpoint identify?
 - If so, what is the frequency associated with this event?
 - If not, why did you make this statement?

The fourth quote by Dr. Bea is *“A large amount of propane in storage tanks that can be affected by strong earthquakes, ignited, that’s a natural hazard, or human hazards; hubris, arrogance, greed, ignorance, and indolence is a disaster sooner or later.”*

- The propane is stored in the horizontal pressure vessels, the butane is stored in horizontal pressure vessels and vertical refrigerated tanks.
 - If Dr. Bea modeled a vessel failure due to an earthquake, then he can provide
 - Frequency calculation(s) for developing a failure of a horizontal pressure vessel during an earthquake.
 - Frequency calculation(s) for developing a failure of a refrigerated vessel during an earthquake.
 - Dr. Bea’s comment uses the word ignited. Are you, Dr. Bea, referring to a flash fire, torch fire, pool fire, or vapor cloud explosion?
 - The word hazard refers to “a chemical or physical condition that has the potential for causing damage to people, property, or the environment.” Thus, the fact that a flammable liquefied gas is stored on site presents a hazard. Using this rationale, every car on the road or plane in the sky (or on the runway) presents a hazard. Is that correct Dr. Bea?
- Human hazards. Dr. Bea, please provide examples, relative to Rancho, on each of the human hazards you identified.

- Hubris (arrogance caused by too great pride)
- Arrogance (full of or due to pride)
- Greed (excessive desire especially for wealth, avarice)
- Ignorance (lacking knowledge or experience)
- Indolence (idle, lazy)
- How did you quantify these hazards? Please identify methods and quantitative data for the following.
 - Consequences associated with each human hazard
 - Frequency associated with each human hazard
 - How were these consequence/frequency pairs incorporated into your risk analysis?

Quotes not attributable to Dr. Bea but presented in the Video

The following quotes come directly from the YouTube video that contains Dr. Bea's comments referenced above. Each quote is presented below and described. At the end of each quote's discussion, Dr. Bea will be asked to agree or disagree with the quote.

Quote 1 - *"There is no way to make these tanks safe."*

Safe is a relative term that has no universal numeric value. If the author assumes that "safe" means zero risk, then nothing in life is safe. If Dr. Bea agrees with this quote, then he must have numerically defined "safe" (as would be done in a risk analysis).

Dr. Bea, what is your numeric definition of safe and what reference do you have for it?

Quote 2 - *"Imagine a blast at the Los Angeles harbor the size of fifty atomic bombs. A fire that cannot be put out with water that would trigger a cascading inferno igniting the multitude of storage tanks, petroleum factories, underground gas pipes, and everything in its path."*

The method of determining how much energy is in a fuel and equating that amount of energy to some number of atomic bombs has been shown to be purposely deceiving. It requires the reader to believe the following – The trees in the city park contain enough energy to be equivalent to X atomic bombs. Clearly, no one would consider the trees in a city park to be equivalent to an atomic bomb. Thus, this equivalent energy methodology purposely misleads the reader into think that something that is impossible (e.g., all the trees in the city park "exploding" like an atomic bomb) is actually possible.

This misleading energy equivalence method works like this;

- Calculate, using the heat of combustion of the fuel, the total amount of energy in a tank, ship, train, car, etc. For the purposes of Rancho, add the inventories of all the tanks together.
- The amount of energy in one Hiroshima atomic bomb is ~ 12.5 kT (1 kT = $3.97(10)^9$ Btu)
- Divide the amount of energy of the fuel using the heat of combustion approach by the amount of energy in one Hiroshima atomic bomb and you define how many Hiroshima atomic bomb energy equivalents are in the subject material.
- This presentation is purposely deceiving since the Hiroshima atomic bomb's energy release was instantaneous, and the energy of the fuel at Rancho (for instance) cannot be released instantaneously.
- Using this approach for Rancho (assuming all the tanks are 100% full of liquid, which they cannot be) finds
 - 300,000 gallons of propane = $2.63(10)^{10}$ Btu (using the Gross H_c) = 6.62 kT
 - 25,000,000 gallons of butane = $2.65(10)^{12}$ Btu (using the Gross H_c) = 667 kT
 - Therefore:

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- If all five horizontal tanks contained propane (they do not), the five horizontal tanks would have the energy equivalence of 0.53 Hiroshima atomic bombs.
- The two refrigerated butane tanks would have the energy equivalence of 53 Hiroshima atomic bombs.
- Thus, the energy equivalence in liquefied gas storage at Rancho would be ~53.5 Hiroshima atomic bombs. However, the sequence of events that could lead to all the fuel in the Rancho facility producing the atomic bomb effect is physically impossible, not just unlikely, impossible.
- For the atomic bomb equivalence analogy to be true (as far as immediate destruction potential is concerned), you would need to agree that the following is physically possible
 - Instantaneous vaporization of 100 % of the propane and butane in the Rancho facility (all seven major tanks).
 - Instantaneous mixing of all vapor with air to stoichiometric concentrations.
 - Instantaneous compression of all flammable mass to about the size of a softball.
 - Detonation of all flammable mass with 100 % yield.

Dr. Bea, do you agree that the situation described above is physically possible and accurately portrays the destructive potential of the Rancho facility?

- In order to demonstrate how misleading the energy equivalence methodology is, consider Table 1 below. The energy equivalence methodology was made for several common materials that one would easily argue could not “vaporize instantaneously,” yet that is the argument made above.

Dr. Bea, do you think Table 1 presents an accurate representation of the immediate destruction potential of materials such as wood, coal, gasoline, and crude oil?

Quote 3 - *“We’ve got two ultrahazardous butane tanks containing over 25 million gallons and propane bullet tanks containing 300,000 gallons.”*

- There is no definition of “ultrahazardous butane tanks” or “ultrahazardous tanks” in general.
- This statement is simply made-up.
- The fact that propane and butane are stored in the Rancho tanks simply identifies the flammable fluids as being hazardous. There is no definition of ultrahazardous in regard to flammable fuel storage.

Dr. Bea, would you define ultrahazardous in the way identified above? If so, please provide a reference for the definition.

Quote 4 - *“These tanks are a quarter-mile from the Los Angeles harbor and would make a high-value target for any terrorist.”*

- What evidence exists that these tanks qualify as a “high-value target for any terrorist?”

Dr. Bea, do you agree with this assessment, and if so, how was it modeled for consequence and frequency in your risk analysis?

Quote 5 - *“These tanks are built on sand banks called liquefaction areas. They stand 150 feet from a rupture zone with a potential 7.3 magnitude quake at hand.”*

- Please provide references for the following.
 - The tanks are built on sand banks called liquefaction areas.
 - Which rupture zone is 150 feet from the tanks?
 - Reference for 7.3 magnitude earthquake originating at rupture zone.

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- Calculations showing how a 7.3 magnitude quake some distance away (assumed to be 150 feet) from the tanks affects the failure of one or more tanks.

Dr. Bea, have you seen these calculations? If so, who did the calculations, and do you agree with them, and are the consequences and frequencies included in your risk analysis? If you don't agree with them, are these events excluded from your risk analysis?

Quote 6 - *"This propane and butane is stored above ground in refrigerated tanks and when the liquid is exposed to air, it immediately vaporizes to over 230 times its original volume. A leak from a rupture would float down the sand bank, into the storm drain, and spill out into the harbor."*

- The author of this quote could use some help.
 - Propane and butane are stored in the horizontal pressure vessels.
 - Only butane is stored in the vertical refrigerated tanks.
 - The storage conditions for the propane and butane in the pressure vessels and butane in the refrigerated tanks do not allow all of the released liquids to "immediately vaporize." This is physically impossible. Consider the following.
 - Normal boiling point of nitrogen is -320°F
 - Normal boiling point of propane is -43.7°F
 - Normal boiling point of butane (*n*-butane) is 31.1°F
 - A common demonstration in high school chemistry classes involves the teacher spilling liquid nitrogen on a lab table. The liquid boils and, over some period of time, it all vaporizes. This does not happen instantaneously. Thus, if nitrogen with a boiling point over 275°F lower than propane and butane does not immediately vaporize, why would propane and butane act differently?
- The authors appear to contradict themselves. If the propane and butane immediately vaporize, how can the propane and butane "float" down into the harbor?

Dr. Bea, do you agree with the quote in the video? If not, do you agree that all the propane and butane cannot "immediately vaporize" upon release?

Table 1
Energy Equivalence Methodology for Common Materials

Material	Heat of Combustion (BTU/lb)	Storage Device	Storage Device Volume or Total Mass	Material Liquid Density (lb/ft³)	Total Mass (lb)	Total Energy (heat of combustion x total mass) (BTU)	Number of Hiroshima Bombs	Can Material Act Like an Atomic Bomb?
Propane	21,000	20 lb cylinder for BBQ grill	20 lb	31.2 (Propane)	20	420,000	0.0000085	No
Gasoline	20,000	30 gallons (automobile gas tank) equal to 4 ft ³	4 ft ³	45.4 (regular gasoline)	181	3,620,000	0.000073	No
Wood	6,000	1/2 cord (4 ft x 8 ft x 2 ft) or 64 ft ³ or the amount of wood loaded in a pickup bed	64 ft ³	45 (Red Oak)	2,880	17,280,000	0.00035	No
Butane	21,200	Railcar (33,000 gallons, 85% full)	3750 ft ³	36.0 (n-Butane)	135,000	2,862,000,000	0.058	No
Propane	21,000	Rancho horizontal pressure vessel, 60,000 gal, 85% full	6820 ft ³	31.2 (Propane)	212,800	4,468,800,000	0.090	No
Crude Oil	18,100	Railcar (33,000 gallons, 85% full)	3750 ft ³	57 (California crude oil)	213,750	3,868,875,000	0.078	No
Butane	21,200	Rancho horizontal pressure vessel, 60,000 gal, 85% full	6820 ft ³	36.0 (n-Butane)	245,500	5,204,600,000	0.10	No
Coal	14,000	Railcar (1 hopper car) holds 110 long tons (110 x 2,240 lbs)	246,400 lbs	55 (Anthracite)	246,400	3,449,600,000	0.070	No
Gasoline	20,000	1 storage tank (60,000 barrels, 85% full)	286,300 ft ³	45.4 (regular gasoline)	13,000,000	260,000,000,000	5.24	No
Coal	14,000	100 railcar coal train (100 hopper cars x 110 x 2,240 lbs)	24,640,000 lbs	55 (Anthracite)	24,640,000	344,960,000,000	6.95	No
Butane	21,200	One Rancho refrigerated storage tank (12.5 million gallons, 85% full)	1,420,500 ft ³	37.4 (n-Butane)	53,125,000	1,126,250,000,000	22.7	No
Butane	21,200	Two Rancho refrigerated storage tanks (25 million gallons, 85% full)	2,841,000 ft ³	37.4 (n-Butane)	106,250,000	2,252,500,000,000	45.4	No
Crude Oil	18,100	1 VLCC (very large crude carrier, 1,000 feet long) with a capacity of 300,000 DWT (dead weight tons). The carrier holds 300,000 long tons	672,000,000 lbs	57 (California crude oil)	672,000,000	12,163,200,000,000	245	No

Quote 7 - *"Butane and propane burn at temperatures hotter than 3,200 degrees and cannot be extinguished by water. No one, not even firefighters, can approach the blaze."*

- Again the author of this quote could use some help.
 - It appears the author may be referencing degrees Fahrenheit (°F)
 - If so, the author appears to be referencing the adiabatic flame temperatures for propane and butane.
 - For comparison, the adiabatic flame temperatures for some common fuels are listed below.
 - Butane = 3578 °F
 - Hydrogen = 4010 °F
 - Methane = 3542 °F
 - Natural gas = 3562 °F
 - Propane = 3596 °F
 - Wood = 3596 °F
 - Kerosene = 3801 °F
 - Bituminous coal = 3943 °F
 - The adiabatic flame temperature is a theoretical, not actual, flame temperature. It is produced by a flame that loses no heat and assumes perfect, complete combustion. As you can see from the list above, the adiabatic flame temperatures for butane and propane are similar to the adiabatic flame temperatures for wood and coal.
- While it is true that putting water on a propane or butane pool fire will not extinguish the fire, there are other materials that have the same behavior (Class B fires including gasoline, paint thinner, oils, etc.) and firefighters are trained to extinguish these types of fires.

There isn't anything for Dr. Bea to comment on here. The author of this quote just does not have the correct information.

In conclusion, a person of Dr. Bea's background should be able to do two things quite easily.

1. Produce the quantitative validation necessary to defend his stated position that the Rancho facility is a "high risk" facility.
2. Review the comments from other speakers on the YouTube video, of which he is a participant, and either agree with their comments and conclusions, or state they are in error and list the reasons why they are in error.

A person with Dr. Bea's reputation can only follow the path that is supported by science.

If you have any questions, please contact me directly.

Sincerely,



John B. Cornwell
Principal Engineer

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RON CONROW
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Plains/Rancho LPG
19430 Beech Avenue
Shafter, California 93263
ronald.conrow@plainsmidstream.com

April 20, 2015

RE: LETTER TO ROBERT BEA APRIL 9, 2015

Dear Mr. Conrow,

You indicated the questions propounded to retired professor Bob Bea were straightforward with the intention of a search for the truth.

Professor Bea's attached responses are indicative of his years of experience in Catastrophic Risk Management and his ability to give an assessment of risk regarding your facility

If you would be so kind to answer the following questions:

- Was an exemption to CEQA Guidelines granted, when, and what was the reason for the exemption?
- Was the exemption based on economic or other factors? If so what were those factors?
- Was there a hearing, either public or private held regarding the exemption?
- Was there an opportunity for public comment on the exemption?
- If a public meeting was held was it in compliance with the Brown Act?
- If a private hearing was held, did the hearing comply with the Brown Act?
- Are there minutes of the hearing?
- Did other local, state or federal agencies testify or make presentations at the hearing regarding the exemption?

- Was there any public notice to residents of the exemption?
- Was the exemption disclosed to any investors as required under the California Corporations Code?
- What happens if the refrigeration system fails in the tanks?
- How often is the refrigeration system inspected?
- Is there a back-up system in place for the refrigeration system?
- What is the inspection/maintenance schedule for the refrigeration system?
- Do the maintenance personnel have special qualifications or training?
- In reality, is Rancho's impound basin (represented as capable of capturing the contents of one of the 12.5 million gallon butane tanks upon rupture) incapable of this action since refrigerated "liquid" butane gas vaporizes and expands over 200 times its volume (as a liquid) upon exposure to warmer ambient air temperature? Is the impound basin dependent on the local ground stability which during an intense earthquake could become locally unstable due to liquefaction and slope failures?
- Would the calculation of the .5 mile blast radius by Quest differ if there were no impound basin?
- Have you reviewed Sparks, Nevada's Hazardous review of 30,000 pounds of propane explosion?
- Has the Sparks, Nevada's Hazardous review been factored into any study or the hazards of this site?
- In the event of an explosion at your facility causing property damage, what are the policy limits for reimbursement to homeowners?
- Has Rancho ever submitted an insurance policy as requested by Alan Gordon, California State Lands commission or the City of Rancho Palos Verdes?
- Is there an existence of a high degree of risk of some harm to the person or property of others by the operation of the Rancho facility? Would you agree LPG is dangerous because of its properties? A flammable gas liquefied by pressure or refrigeration, which

will revert explosively (volume increase) to gas, which is heavier than air, very flammable and virtually inextinguishable?

- Is there likelihood that the harm that results will be great?
- Is the storage of 25 million gallons of butane a matter of common usage in the community?
- Would you comment on your inability to eliminate the risk by the exercise of reasonable care?
- Why your location is not inappropriate for your activity?
- Extent to which Rancho's value to the community is outweighed by its dangerous attributes?
- Is there a mathematical formula to predict how long the butane will remain in a liquid state in the presence of the heat of an explosion which can demonstrate that the liquid butane will not remain cool?
- Do you believe a butane fire will burn itself out before the cool liquid butane has a chance to turn into a gas?
- Is Rancho a money loser subsidized by Plains All American? Why does Plains Marketing pay the rent for the facility drawn on an account in Van Wert, Ohio?
- Is Rancho merely a storage facility for the benefit of Tesoro and Valero?
- Does Rancho pay any money for the use of the rail line immediately adjacent to the facility?

Thank you for your cooperation.

Sincerely,



Anthony G. Patchett, Esq.

(Retired-Assistant Head DDA, Environmental Crimes/OSHA Division, Los Angeles County)

CC: Michael Karzas 60 Minutes, Dan Wiekell, LA Times

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CENTER FOR CATASTROPHIC RISK MANAGEMENT
DEPARTMENT OF CIVIL & ENVIRONMENTAL ENGINEERING
BERKELEY, CALIFORNIA 94720-1710

April 20, 2015

Mr. Ronald Conrow
Rancho LPG Holdings, LLC
2110 North Gaffey Street
San Pedro, CA 90731



Re: Letter dated April 9, 2015 with responses regarding my statements contained in the YouTube video about the Rancho LPG Facility in San Pedro, CA

Dear Mr. Conrow:

I have reviewed the contents of your letter to me dated April 9, 2015 regarding my statements contained in the YouTube video about the Rancho LPG Facility in San Pedro, CA. This letter summarizes my responses to the four quotations I made in the YouTube video.

Before I address the four quotations, I would like to address several statements contained in your letter to me. First, you state:

"We are concerned not only about the inflammatory nature of this video, but the fact the claims portrayed in the video by you and other commenters are lacking proven scientific information required to quantify exactly how the events described in the video can even happen."

The background I reviewed and analyzed that formed the foundation for my statements in this video came from documentation I have obtained since 2011 regarding the Rancho LPG Facility, surrounding facilities, and similar LPG facilities in other locations. This documentation included several qualitative and quantitative 'risk analyses' of the Rancho LPG Facility that addressed some of the major hazards that confront these facilities and the uncertainties associated with performance of these facilities given the different kinds of hazards. These hazards included effects on the facilities and surrounding communities and industrial facilities of intense earthquakes, ground instability (e.g. liquefaction during earthquakes, instability developed as a result of intense storm effects), tsunamis, terrorist activities, and those associated with operations and maintenance of the facilities (e.g. LPG transport into and out of the facilities). This background included several hundred documents.

After I completed review of the background documentation, in mid-2011, I advised Mr. Anthony Patchett that the primary conclusion I reached after analyzing the available background was:

"the only sensible way forward is to have an advanced, high quality, thorough, validated risk analysis performed...this would be similar to advanced analyses that are done for critical facilities such as nuclear power plants."

Mr. Patchett commissioned a detailed review of the background documentation pertaining to Quantified Risk Analyses (QRA) of the Rancho LPG facilities by Mr. Philip Meyers of PEMY Consulting. Mr. Meyers issued a report at the end of December 2011 summarizing the results of his review. Mr. Meyers developed a series of detailed recommendations that addressed development of a comprehensive QRA for these facilities; thus, corroborating my primary conclusion.

The consequence of these developments is that your request for “proven scientific information required to quantify exactly how the events described in the video can even happen” does not exist at this time. The statements I made in the video represent my synthesis of the information and conclusions regarding the risks of major accidents associated with the existing Rancho LPG facilities.

In your letter you state: “you should be able to provide the technical information to support your claims and those of the other video commenters.” Your contention that I should be able to provide the technical information to support those of the other video commenters is not correct. Prior to release of the video, I was not able to review, validate, or comment on the comments and observations made by the other video commenters. Those individuals should be given the opportunity to respond as I am responding to the four comments I made during the video.

Further, in your letter you state: “However, if you support the claims contained in the video, it should be quite simple for you to produce quantitative validation required to defend the positions of you and the other video commenters. Later in this letter, I will provide the background for the four comments I made during the video. As I summarized in the foregoing paragraph, I will not “defend the positions...of the other video commenters.”

Finally, in your letter you state:

“The questions posed by Quest are straightforward (no gotcha questions) with the intention of scientifically explaining how an event can or cannot happen. The residents of San Pedro concerned about ‘public safety’ are deserving of facts based upon science and not rhetoric!”

I agree that the residents of San Pedro and the local, State, and Federal government agencies having responsibilities for these facilities are deserving of facts based on science not rhetoric. Unfortunately, based on the available background information I have reviewed which includes a QRA performed by Quest Consultants Inc., I do not think there is sufficient valid and validated information (qualitative and quantitative) to inform the residents of San Pedro and the responsible local, State, and Federal government agencies regarding the ‘public safety’ and risks of major accidents associated with the Rancho LPG facilities. I think it is incumbent upon Rancho LPG Holdings LLC to provide the residents of San Pedro and the responsible government agencies the scientifically based information on the ‘public safety’ and risks (likelihoods and consequences) associated with major accidents involving the Rancho LPG facility.

Next, I will address each of the four statements I made in the video as summarized in your letter to me and further detailed in the letter from Quest Consultants Inc. to you (dated April 7, 2015).

Dr. Bea: “Rancho is a very volatile, explosive, flammable gas.”

The commentary provided by Quest (page 2) properly characterizes the LPG contained in the name of your company: Rancho LPG Holdings LLC: Liquefied Petroleum Gas:

Clearly, the Rancho facility is not a gas, but the Rancho facility does store flammable liquefied gases (propane and butane in liquefied form). It would be beneficial to educate the listener that volatility only applies to liquids (or some solids that sublime like carbon dioxide) but not to gases. Other common materials are both volatile and flammable. Materials such as gasoline, diesel, kerosene, acetone, and ethyl alcohol, are all volatile liquids and are quite common and, once vaporized, will produce a flammable gas. If a material is flammable, it can be involved in an explosion. Thus, all the materials outlined above are also “explosive.”

Dr. Bea: "It also has very high risk because of the population and community that surrounds it."

The commentary provided by Quest (page 3) properly defines the information that should be *but is not* available:

The statement is made in reference to Rancho being "high risk" due to the population around the facility. Since risk is a product of consequence and frequency, in order to make the statement above, Dr. Bea must have calculated both components of risk, as well as defined what "high" means in regard to risk. Since this exercise must have already been completed by Dr. Bea in order to make such a statement, it should be straight-forward to identify the following components that make Rancho a "high risk" facility.

My statement is based on the information contained in the series of 'risk analyses' documents I cited earlier in this document. My synthesis of that information led to my qualitative assessment of "high risk". That assessment included an assessment of the likelihoods of major accidents due to the multiple categories of hazards I cited earlier (earthquakes, severe storms, ground instability, terrorist activities, and operating and maintenance activities) and the consequences (deaths, severe injuries, property and productivity damages, and direct and indirect monetary costs).

During the past 45 years, I have been involved as an originator, contributor and reviewer of more than one hundred QRAs involving 'High Risk Systems.' This work has been associated with design, construction, maintenance, and operation of onshore and offshore industrial oil and gas exploration, production, transportation, and refining systems. Several of these QRAs were associated with oil and gas production and transportation facilities located onshore and offshore Southern California near the Rancho LPG facilities. I have written three books, contributed chapters in 4 other books, written several hundred refereed technical papers and reports, and taught university undergraduate and graduate courses on System Risk Assessment and Management (SRAM) of engineered systems for more than 20 years. This work has been closely associated with my forensic engineering work as a primary investigator on more than 30 major accidents and disasters that have primarily involved oil and gas exploration, production, transportation, and refining systems. This work has been involved with more than 40 major national and international joint industry – government sponsored research projects that addressed SRAM of complex engineered systems.

The latest of these SRAM research projects was a 6-year duration project sponsored by the National Science Foundation. The goal of this project was to develop and validate advanced SRAM methods to address the complex, interconnected, interactive infrastructure systems (gas storage and transportation, power and water supply, marine, highway, and railway transportation, communications, flood protection) located in the California Delta. This research project addressed primary deficiencies found in previous formal quantitative QRAs and PRAs: 1) omission of important categories of uncertainties, 2) systematic incorporation of optimistic human and organizational 'biases,' 3) assumptions integrated into the risk analyses that were not validated, 4) systematic underestimate in the consequences of major accidents, 5) omission of important interactions between infrastructure components and systems, and 6) application of inappropriate risk 'acceptability' and 'tolerability' criteria. All of these deficiencies resulted in dramatic under-estimates of the infrastructure risks and inappropriate acceptance – tolerability of those risks. I have detected evidence of all of these deficiencies in the existing formal QRAs that have been performed for the Rancho LPG facilities.

This experience has provided me with an extensive 'library' of experience and knowledge about QRAs, PRAs (Probabilistic Risk Analyses), PSM (Process Safety Management), Safety Cases, and other relevant technologies that apply to understanding the risks posed by the Rancho LPG facilities. The combination of this previous experience together with the knowledge I developed from my review of the previous studies of the Rancho LPG facilities provided the basis for this and the other statements I made in the video.

Dr. Bea: “ (If) One of the tanks fails, within a three mile radius of that tank approximately half a million people live. That’s high risk.

Based on the results contained in the previous Rancho LPG ‘risk analysis’ studies I reviewed, the three mile radius was the distance I estimated that there could be significant negative effects or consequences from the explosion of one of the Rancho vertical LPG storage tanks. That distance could be significantly greater if both of the vertical storage tanks failed during a single event or other nearby facilities (e.g. Rancho horizontal LPG storage tanks, adjacent refining facilities) were involved in a cascade or propagation of fires and explosions. I estimated the number of people who could live, work, and be present in this densely populated and industrial area during such an event. My qualitative assessment of the likelihood and consequences associated with such an event indicated the risks could be ‘High’.

Dr. Bea: “A large amount of propane in storage tanks that can be affected by strong earthquakes, ignited, that’s a natural hazard, or (plus) human hazards: hubris, arrogance, greed, ignorance, and indolence is a disaster sooner or later.”

The commentary provided by Quest (page 4) properly characterizes the storage tanks I referenced:

“The propane is stored in the horizontal pressure vessels, the butane is stored in horizontal pressure vessels and vertical refrigerated tanks.”

This commentary also defines the potential types of gas ignition as:

“flash fire, torch fire, pool fire, or vapor cloud explosion” and combinations of these types.

The Quest commentary further observes:

The word hazard refers to “a chemical or physical condition that has the potential for causing damage to people, property, or the environment.” Thus, the fact that a flammable liquefied gas is stored on site presents a hazard. Using this rational, every car on the road or plane in the sky (or on the runway) presents a hazard. Is that correct Dr. Bea?

Yes, I think these are correct statements. It is for these very reasons that the technology associated with SRAM has been developed. There are many important hazards that need to be properly recognized, evaluated and managed before there are major accidents that can have dramatic negative effects on people, property, productivity, environmental quality and the quality of life.

The Quest commentary requested that I address the “human hazards” I detailed in my quotation and how they are relevant to Rancho. These human hazards were part of the ‘equation’ (analytical expression) I developed to explain simply why and how major disasters have and continue to happen. I based this ‘Equation for Disaster’ on my detailed ‘Root Causes Analyses’ studies of more than 600 major accidents and my more than 30 forensic engineering investigations of major disasters that have included the failures of the flood protection system for the Greater New Orleans area during and following Hurricane Katrina, the BP Deepwater Horizon Maconodo well blowout in the Gulf of Mexico, and the PG&E San Bruno gas pipeline fires and explosions.

The Equation for Disaster is: $A + B = C$. ‘A’ are natural hazards like explosive hydrocarbons, corrosion, metal fatigue, earthquakes, tsunamis, hurricanes, and instability of the ground. ‘B’ are human hazards including hubris, arrogance, greed, complacency, ignorance, and indolence. ‘C’ are disasters sooner or later. The definitions of these human hazards in the Quest commentary (page 5) are appropriate.

At this point in my review of the documentation associated with the Rancho LPG facilities, I have detected plentiful evidence of the presence of ALL of the 'B' human hazards in the 'Equation for Disaster.' In addition, there is ample valid evidence available to characterize the multiplicity of significant natural hazards at and in the vicinity of these facilities. I conclude it is time for Rancho LPG Holdings LLC to take effective actions to avoid the 'C' results associated with the facilities it owns and operates.



Robert Bea, PhD, PE (retired)
Professor Emeritus
Center for Catastrophic Risk Management
University of California Berkeley

Kit Fox

From: Janet Gunter <arriane5@aol.com>
Sent: Monday, April 27, 2015 12:27 PM
To: gene_seroka@portla.org
Cc: noelweiss@ca.rr.com; alan.gordon@treasurer.ca.gov; abaker@sco.ca.gov; jennifer.lucchesi@slc.ca.gov; heather.hutt@sen.ca.gov; MrEnvirlaw@sbcglobal.net; amartinez@earthjustice.org; jones@usgs.gov; Kit Fox; rgb251@berkeley.edu
Subject: Rancho LPG and the Port situation
Attachments: rancho rail accident mar 8 2012 angle 2.jpg; la_times_apr4_1977.pdf; la_times_jul16_1977.pdf; lpg article proposal 1977.pdf

Hello Mr. Seroka-

While our homeowners have been hitting the problem of the Rancho LPG issue on many fronts....it dawned on me today that we should really focus some greater effort on promised discussions with the port. Hence, my contact with you today. At a State Lands Commission hearing almost a year ago now, your port attorney and Dave Matthews promised Chair, Alan Gordon, that they would be engaging in conversations with the attorney that has been assisting our homeowners on this issue for several years now, Noel Weiss. Contact was never made by either of the Port reps to bring this promise to fruition. We would like to schedule a meeting with you to discuss this entire issue.

While the City of LA and its councilman and mayor have both recognized publicly (TV interviews) the jeopardy that this facility and its operation poses to the adjacent communities, the leadership to take action to "prevent" a looming catastrophe has been absent. The Rancho Palos Verdes City Council has also solicited the cooperation and assistance of the City of LA on this issue to no avail.

The latest earthquake in Nepal is just a recent reminder of the deadly aftermath that significant quakes represent. The Port of LA continues to play a vital role in the allowance of an operation that poses an extremely high explosive risk to the entire Harbor area. That risk, of course, includes the massive and extremely important infrastructure of the industrial port complexes. In 2004, the Port of LA denied the renewal of the Amerigas/Rancho LPG pipeline lease to a port wharf. The reason (while the inference was made by the port that it was primarily for the safety of residents) was because the port could not complete the build out of the China Shipping terminal expansion project with the hazardous pipeline in place. However, the port "continues" to this day to allow the private Rancho LPG LLC business (no longer a port tenant) to transport their highly explosive commodity across a port controlled "rail spur" (for a paltry \$1200/mo) and across port controlled rail that fronts on Gaffey St. and runs through the port daily. Each 30,000 gallon rail car of propane/butane gas has a blast radius of .42 mile. There has NEVER been any analysis to estimate potential for damage from this facility or this rail transportation practice....NOR is there any adequate liability insurance in place to cover losses by what FERC filings illustrate to be... an "insolvent" Rancho LPG. This appears to be a major issue of reckless mismanagement.

The Port of LA is dealing with the current upgrade of its marine oil terminals to MOTEMS standards in an attempt to protect the assets of the port. Smart. These upgrades include seismic improvements to terminals to meet a seismic standard of 8.0. Meanwhile, within 1/4 mile of the inner harbor of the port, sits the Rancho LPG facility, built to a seismic substandard of 5.5 - 6.0! The Rancho 25+ million gallons of both butane and propane gas on premises is the stored energy equivalent of over 50 atomic bombs! So, the question is, "How prudent is the investment of many millions of dollars into these improvements at your port marine terminals, when the Rancho facility (with more than a 3 mile blast radius from a single 12.5 million gallon butane tank)...sitting on the edge of the harbor...can obliterate any benefit that might have been derived from those upgrades?" Why is the port and State Lands not asking this question? Why are they not protecting this major investment??

I know that you have more than likely seen the youtube video that is the promo for a documentary in progress on this issue, I am again providing that link.

https://m.youtube.com/watch?v=TBGt_XKNpRk

I have also attached a photo of the rail car collision on your rail spur at Westmont & Gaffey street on March 8, 2012. That accident miraculously escaped tank rupture. There was also a derailment on the rail fronting Gaffey Street at Channel on Memorial Day 2005. Again, "luck" saved the day.

Other attachments are archived articles that will help you understand just how long there have been concerns about this facility. "Pure luck" cannot last forever. On multiple fronts, this situation increases in probability for disaster daily. Our hope is that you, as the new port leader, will take the action that has been so woefully avoided, to prevent the inevitable. Whether it is the expected "big one", a "terrorism event" (as warned by retired Coast Guard Commander Flynn), a failing antiquated 40+ year old infrastructure, or simple human error, the consequences of ignoring this danger

are too great to even imagine. But, we MUST respond to this very obvious "clear and present danger". We need you, Mr. Seroka, to step up.

Please schedule a meeting with us to discuss this asap. The other day was Nepal....but, our time is coming.....and we know it won't be too long.

Thank you for your time.

Janet Gunter

Kit Fox

From: Seroka, Gene <gene_seroka@portla.org>
Sent: Sunday, May 03, 2015 8:10 PM
To: Janet Gunter
Cc: noelweiss@ca.rr.com; alan.gordon@treasurer.ca.gov; abaker@sco.ca.gov; jennifer.lucchesi@slc.ca.gov; heather.hutt@sen.ca.gov; MrEnvirlaw@sbcglobal.net; amartinez@earthjustice.org; jones@usgs.gov; Kit Fox; rgb251@berkeley.edu; Tankersley, Eileen; Swift, Erica
Subject: Re: Rancho LPG and the Port situation

Janet,

I will be happy to meet with you. Although I am traveling on bush was this week, Eileen will work with you on potential meeting days/times.

Regards, Gene

Sent from my iPhone

> On Apr 27, 2015, at 12:27 PM, Janet Gunter <arriane5@aol.com> wrote:

>

> Hello Mr. Seroka-

> While our homeowners have been hitting the problem of the Rancho LPG issue on many fronts....it dawned on me today that we should really focus some greater effort on promised discussions with the port. Hence, my contact with you today. At a State Lands Commission hearing almost a year ago now, your port attorney and Dave Matthews promised Chair, Alan Gordon, that they would be engaging in conversations with the attorney that has been assisting our homeowners on this issue for several years now, Noel Weiss. Contact was never made by either of the Port reps to bring this promise to fruition. We would like to schedule a meeting with you to discuss this entire issue.

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stored energy equivalent of over 50 atomic bombs! So, the question is, "How prudent is the investment of many millions of dollars into these improvements at your port marine terminals, when the Rancho facility (with more than a 3 mile blast radius from a single 12.5 million gallon butane tank)...sitting on the edge of the harbor...can obliterate any benefit that might have been derived from those upgrades?" Why is the port and State Lands not asking this question? Why are they not protecting this major investment??

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>

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> Janet Gunter

> <rancho rail accident mar 8 2012 angle 2.jpg> <la_times_apr4_1977.pdf>

> <la_times_jul16_1977.pdf> <lpg article proposal 1977.pdf>

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Kit Fox

From: Janet Gunter <arriane5@aol.com>
Sent: Thursday, May 07, 2015 9:33 AM
To: heather.hutt@sen.ca.gov; Lara.Larramendi@mail.house.gov; lisa.pinto@mail.house.gov; amartinez@earthjustice.org; MrEnvirlaw@sbcglobal.net; noelweiss@ca.rr.com; det310@juno.com; connie@rutter.us; igornla@cox.net; darzavalney@aol.com; rreg55@hotmail.com; jdimon77@yahoo.com; president@centralsanpedro.org; dwgkaw@hotmail.com; jhwinkler@me.com; carl.southwell@gmail.com; sarahnvaldez@gmail.com; jwilliamgibson@ca.rr.com; Kit Fox; irene@miraclegirlproductions.org; gene_seroka@portla.org; rob.wilcox@lacity.org; fmillar@erols.com; kaiephron@yahoo.com
Cc: rgb251@berkeley.edu; lpryor@usc.edu; ahricko@hsc.usc.edu; meshkati@usc.edu
Subject: 4 min. report- hazard of crude due to addition of a "modicum" of LPG..."PURE LPG CARS" NOT MENTIONED!

Please Watch!

The incredibly higher danger of the transport of "full rail cars of butane and propane gas" (that which is making the new crude oil more volatile) is not even mentioned in this report! The Rancho LPG storage facility transports its 30,000 gallons of "pure and highly...highly explosive" propane and butane in rail cars that run through our neighborhoods and the port daily!! The blast radius from a single 30,000 gallon railcar of the propane or butane commodity has a .42 mile blast radius! Rancho is also transporting this gas on the backs of large trucks which have an inherently higher rate of accident. All of this action that gravely jeopardizes adjacent local residential populations, schools and youth sports fields continues to be conducted without so much as a comprehensive risk analysis! This irresponsibility must stop!

http://www.aol.com/article/2015/05/06/oil-train-derailment-prompts-evacuation-in-north-dakota-town/21180327/?icid=maing-grid7%7Cmain5%7Cd15%7Csec3_ink4%26pLid%3D1230698675&a_dgi=aolshare_facebook

Janet Gunter

Kit Fox

From: Janet Gunter <arriane5@aol.com>
Sent: Thursday, May 07, 2015 11:28 AM
To: det310@juno.com; connie@rutter.us; noelweiss@ca.rr.com; MrEnvirlaw@sbcglobal.net; amartinez@earthjustice.org; igornla@cox.net; dwgkaw@hotmail.com; burling102@aol.com; darzavalney@aol.com; sarahnvaldez@gmail.com; jdimon77@yahoo.com; rreg55@hotmail.com; dlrivera@prodigy.net; peter.burmeister@sbcglobal.net; mandm8602@att.net; bonbon90731@gmail.com; jody.james@sbcglobal.net; john@nrcwater.com; carl.southwell@gmail.com; Kit Fox; chateau4us@att.net; claudia.r.mcculloch@gmail.com; ruboysen@aol.com; jhwinkler@me.com; hanslaetz@gmail.com; irene@miraclegirlproductions.org; president@centralsanpedro.org; fxfeeney@aol.com; fmillarfoe@gmail.com; fmillar@erols.com
Cc: rgb251@berkeley.edu; ahricko@usc.edu; meshkati@usc.edu; lpryor@usc.edu; heather.hutt@sen.ca.gov; Lara.Larramendi@mail.house.gov; lisa.pinto@mail.house.gov
Subject: THIS IS WHO OWNS RANCHO LPG....."PLAINS"A GLIMPSE AT CHARACTER OF OPERATORS!

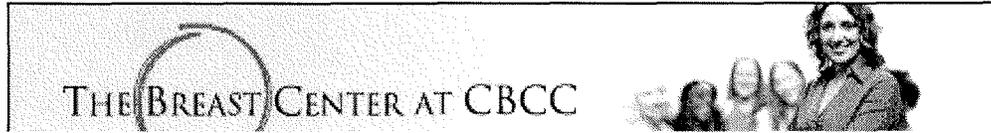
<http://www.bakersfieldcalifornian.com/business/kern-gusher/x1510915323/EPA-faults-air-districts-approval-of-oil-train-terminal-near-Taft>



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➔ Login (/login?return=%2FBlogs%2F2015%2F05%2F05%2FEPA-faults-air-district-s-approval-of-oil-train-terminal-near-Taft.html) Register (/registration?return=%2FBlogs%2F2015%2F05%2F05%2FEPA-faults-air-district-s-approval-of-oil-train-terminal-near-Taft.html)



EPA faults air district's approval of oil train terminal near Taft (/Blogs/2015/05/05/EPA-faults-air-district-s-approval-of-oil-train-terminal-near-Taft.html)

By JOHN COX, The Bakersfield Californian jcox@bakersfield.com

SUNDAY, MAY 17, 2015 3:47 AM



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om%2Fimage%2F2015%2F05%2F05%2F600x600_q90_w%2F1952135269-data-

ox%2F%20The%20Californian&BackURL=http%3A%2F%2Fwww.bakersfield.com%2FBlogs%2F2015%2Fminal-near-Taft.html&BackText=Back%20to%20the%20Story)

John Cox/ The Californian

One hundred tanker cars formed a mile-long train waiting to be unloaded in early December at Plain Pipeline LP's new rail-to-pipeline near Taft. The train carried about 70,000 barrels of oil, or about 3 m facility was designed to handle two such trains per day.

Federal officials say a new oil-by-rail terminal near Taft qualifies as a major air polluter that should have undergone a more rigorous environmental review.

The U.S. Environmental Protection Agency said in letters mailed Thursday that the facility was wrongly permitted by the San Joaquin Valley Air Pollution Control District, and that Houston-based terminal owner Plains Marketing LP violated the Clean Air Act by failing to obtain proper permission to operate it.

It remained unclear Monday what the 10-count notice of violations might mean to the facility's operation. Plains was given 10 days starting April 30 to arrange a meeting to discuss the findings with the EPA.

Each count carries a maximum fine of \$37,500 per day, starting the day the notice was issued. Criminal penalties are possible if the company remains in violation 30 days after the notice was sent.

Plains said Monday it could not comment because it had not yet received formal notification of the allegations.

A lawyer for the air district faulted the notice, saying the EPA's findings run contrary to years of established practice.

Opened in November, the Plains facility is capable of receiving up to two oil trains per day, each a mile long, and diverting the crude into pipelines connected to refineries around the state. Its permit currently allows for only one mile-long shipment per day.

The facility, one of two large oil-by-rail terminals permitted near Bakersfield, is the target of a lawsuit environmental activists filed in January in Kern County Superior Court. It alleges Plains worked with the air district to minimize public scrutiny of the project, and that a more rigorous review is in order.

Such terminals have stirred controversy across North America because of a series of fiery oil train derailments in recent years. But the January lawsuit, and now the EPA's notice of violations, focus on emissions, not potential derailments, as a reason to be wary of the projects.

A spokeswoman for Earth Justice, one of the environmental groups opposed to the Plains terminal, said the EPA's finding was not directly related to January's legal action, but that it is nevertheless a big help to the lawsuit.

The EPA notice said the air district concluded in 2012 the terminal was exempt from a more robust review, because its emissions fell below a certain level.

But the federal agency said the air district failed to consider potential air pollution from floating roofs inside oil storage tanks at the site. If those roofs had been properly taken into account, the EPA said, the terminal would be classified as a major polluter, triggering a wider review.

Air district Counsel Annette Ballatore-Williamson countered, saying roof tank emissions occur at most once per year, during maintenance and repair, and that the EPA has long accepted the air agency's approach to regulating floating roof tanks.

"We're a little bit frustrated" by the EPA notice, she said. "We think, based on our reviews, the EPA is dead wrong."

Ballatore-Williamson said she was unsure whether her agency would try to attend any meeting between Plains and the EPA, but noted the district "definitely has an interest in defending the legitimacy of its practices."

Several environmental advocacy groups expressed satisfaction with the EPA's notice of violations, including the Sierra Club's local chapter.

"This terminal wreaks havoc on our region's already compromised air quality and our communities now fear the risk of exploding trains," Gordon Nipp, vice chairman of the Sierra Club's Kern-Kaweah Chapter, said in a news release.

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Kit Fox

From: Janet Gunter <arriane5@aol.com>
Sent: Wednesday, May 20, 2015 9:53 PM
To: MrEnvirlaw@sbcglobal.net; noelweiss@ca.rr.com; amartinez@earthjustice.org; connie@rutter.us; igornla@cox.net; jhwinkler@me.com; lonnacalhoun@me.com; darlenezavalney@aol.com; sarahnvaldez@gmail.com; pedrolaurie@yahoo.com; det310@juno.com; jody.james@sbcglobal.net; bonbon90731@gmail.com; irene@miraclegirlproductions.org; fxfeeney@aol.com; igornla@cox.net; Kit Fox; donna.littlejohn@langnews.com; nick.green@langnews.com; paul_h_rosenberg@hotmail.com; jdimon77@yahoo.com; president@centralsanpedro.org; rreg55@hotmail.com; pmwarren@cox.net; burling102@aol.com; mikelisk@aol.com; readsmd@aol.com; dwgkaw@hotmail.com; jwilliamgibson@ca.rr.com; cicoriae@aol.com; alsattler@igc.org; marciesmiller@sbcglobal.net; dlrivera@prodigy.net; peter.burmeister@sbcglobal.net; mandm8602@att.net
Cc: heather.hutt@sen.ca.gov; Lara.Larramendi@mail.house.gov; lisa.pinto@mail.house.gov; rgb251@berkeley.edu; lpryor@usc.edu; carl.southwell@gmail.com; abaker@sco.ca.gov; alan.gordon@treasurer.ca.gov; david.wulf@hq.dhs.gov; rob.wilcox@lacity.org; matthew.rodriguez@calepa.ca.gov; carlos.delaguerra@lacity.org; gene_seroka@portla.org
Subject: More on the history of Rancho LPG's operators.."Plains"...more insight into a hard reality

Improperly sited facility storing 25+ Million Gallons of highly explosive gas...sitting on an earthquake fault of 7.3 potential in tanks built over 40 years ago to a seismic standard of 5.5...with a 3.1 mile radius of blast impact from a single "one" of two 12.5 million gallon butane tanks on "USGS" designated "landslide" area....located within 1,000 ft. of homes, schools and shops.....and "operated" by this cast of characters? Really? And, what is anyone doing about it? EPA has no protective regulations in place whatsoever to guard the public's safety....the City of LA has said that their "hands are tied".....and Rancho/Plains says they are "legal". Is there any justification for this insanity and recklessness? The answer is "no". Deadly and unacceptable consequences lie in wait while everyone simply twiddles their thumbs awaiting the disaster. See story:

<http://america.aljazeera.com/articles/2015/5/20/plains-all-american-has-history-of-oil-spills.html>

Janet Gunter

Kit Fox

From: ReadSMD@aol.com
Sent: Thursday, May 21, 2015 10:01 PM
To: arriane5@aol.com; MrEnvirlaw@sbcglobal.net; noelweiss@ca.rr.com; amartinez@earthjustice.org; connie@rutter.us; igornla@cox.net; jhwinkler@me.com; lonnacalhoun@me.com; darlenezavalney@aol.com; sarahnvaldez@gmail.com; pedrolaurie@yahoo.com; det310@juno.com; jody.james@sbcglobal.net; bonbon90731@gmail.com; irene@miraclegirlproductions.org; fxfeeney@aol.com; Kit Fox; donna.littlejohn@langnews.com; nick.green@langnews.com; paul_h_rosenberg@hotmail.com; jdimon77@yahoo.com; president@centralsanpedro.org; rreg55@hotmail.com; pmwarren@cox.net; burling102@aol.com; mikelisk@aol.com; dwgkaw@hotmail.com; jwilliamgibson@ca.rr.com; cicoriae@aol.com; alsattler@igc.org; marciesmiller@sbcglobal.net; dlivera@prodigy.net; peter.burmeister@sbcglobal.net; mandm8602@att.net
Cc: heather.hutt@sen.ca.gov; Lara.Larramendi@mail.house.gov; lisa.pinto@mail.house.gov; rgb251@berkeley.edu; lpryor@usc.edu; carl.southwell@gmail.com; abaker@sco.ca.gov; alan.gordon@treasurer.ca.gov; david.wulf@hq.dhs.gov; rob.wilcox@lacity.org; matthew.rodriquez@calepa.ca.gov; carlos.delaguerra@lacity.org; gene_seroka@portla.org
Subject: Re: More on the history of Rancho LPG's operators.. "Plains" ...more insight in...

Janet--the chronic dysfunction that parallels Rancho/Plains is the repeated ineffectiveness of our various area politicians, agencies, and organs of government to respond to this problem. When I drive by, it has occurred to me that perhaps a well-targeted campaign involving civil disobedience would start a more effective process.

In a message dated 5/20/2015 9:53:00 P.M. Pacific Daylight Time, arriane5@aol.com writes:

Improperly sited facility storing 25+ Million Gallons of highly explosive gas...sitting on an earthquake fault of 7.3 potential in tanks built over 40 years ago to a seismic standard of 5.5....with a 3.1 mile radius of blast impact from a single "one" of two 12.5 million gallon butane tanks on "USGS" designated "landslide" area....located within 1,000 ft. of homes, schools and shops.....and "operated" by this cast of characters? Really? And, what is anyone doing about it? EPA has no protective regulations in place whatsoever to guard the public's safety....the City of LA has said that their "hands are tied".....and Rancho/Plains says they are "legal". Is there any justification for this insanity and recklessness? The answer is "no". Deadly and unacceptable consequences lie in wait while everyone simply twiddles their thumbs awaiting the disaster. See story:

<http://america.aljazeera.com/articles/2015/5/20/plains-all-american-has-history-of-oil-spills.html>

Janet Gunter

Firm behind California oil spill has shaky safety record

Plains All American Pipeline has a long history of safety and environmental violations, records show

May 20, 2015 12:42PM ET Updated 9:50PM ET

by **Renee Lewis**

The U.S. pipeline operator responsible for Tuesday's rupture, which released up to 105,000 gallons of oil into the Pacific Ocean off Southern California, has a shaky safety record, reports show.

A rupture in a 24-inch pipeline operated by Plains All American Pipeline left a 4-mile trail of oil on the shores along Highway 101 near Santa Barbara, according to Coast Guard Petty Officer Andrea Anderson.

Officials warned the public to keep off the polluted shoreline after toxic fumes were reported in the area. The California Department of Fish and Wildlife said Wednesday that it was assessing the damage to the area's wildlife and on Wednesday night, Gov. Jerry Brown declared a state of emergency in Santa Barbara County due to the effects of the spill.

Plains said it shut down the flow of oil after the spill and initiated its emergency response procedures. Boom trucks were sent in Tuesday to clean the water.

"Plains deeply regrets this release has occurred and is making every effort to limit its environmental impact," the company said in a statement. "Our focus remains on ensuring the safety of all involved."

The company did not respond to Al Jazeera's request for comment.

Tuesday's spill follows a long history of safety and environmental violations by the company in the United States and Canada, news reports and Environmental Protection Agency records show.

In 2014 a Plains pipeline ruptured in Los Angeles' Atwater Village, sending more than 18,000 gallons of crude running through the city's streets. Toxic fumes were reported in the industrial area for days after the spill.

The company has been cited for 10 oil spills that violated the Clean Water Act in Texas, Louisiana, Oklahoma and Kansas. In 2010, Plains settled with the EPA after agreeing to pay \$3.2 million in civil penalties.

In April 2011 a pipeline operated by the company's Canadian branch, Plains Midstream Canada, ruptured in a remote area of Alberta's boreal forest, releasing at least 37,000 barrels of crude oil. The same line ruptured in 2006, spilling about 180 barrels.

In a 2012 spill, a smaller line operated by Plains Midstream Canada ruptured, spilling 2,900 barrels of crude into the Red Deer River in central Alberta. The company was ordered in January to hire a third party to audit its pipelines in Alberta, Saskatchewan, Manitoba and Ontario after regulators said the company failed to comply with previous safety directives.

Despite its spill record, Plains has plans to construct a pipeline in Arkansas, where an Exxon Mobil pipeline ruptured in March 2013, spilling more than 134,000 gallons of crude oil into a housing subdivision, forcing hundreds of residents to evacuate.

Plains' recent pipeline ruptures come amid increasing pipeline accidents across the U.S. involving different operators, government data show.

There were 704 oil and gas pipeline incidents involving leaks or emergency shutdowns to avoid accidents in 2014, according to data from the Pipeline and Hazardous Materials Safety Administration (PHMSA), a branch of the U.S. Department of Transportation.

That averages nearly two spills every day last year in the United States.

The pipeline incidents from 2014 resulted in 19 deaths, 96 injuries and over \$300 million in reported property damage, PHMSA data show. Since 1995, there have been more than 10,000 incidents, 371 deaths, 1,398 injuries and in excess of \$6 billion in reported property damage.

1 April 2015

Naval Facilities Engineering Command Southwest
DFSP San Pedro EA Project Manager
ATTN: Code JE20.GB
1220 Pacific Hwy.
San Diego, CA 92132-5190

SUBJECT: Comments on the Scope of the Draft Environmental Assessment for the Proposed Closure of Defense Fuel Support Point (DFSP) San Pedro

Dear Sir/Madam:

The City of Rancho Palos Verdes has received notice of the proposed closure of DFSP San Pedro, and we attended the open house and public scoping session that was held on March 18, 2015 in San Pedro. We offer the following comments on the scope of the draft Environmental Assessment (EA) to be prepared for this proposal:

1. We understand that, once the draft EA completed, it will be released for a 15-day public review and comment period, as required pursuant to the provisions of the National Environmental Policy Act (NEPA). We further understand that the draft EA could be released by this summer. With summer vacations and other family obligations, we are concerned that residents in Rancho Palos Verdes, the surrounding Los Angeles communities of San Pedro and Wilmington, and the City of Lomita would not have sufficient time to review and provide meaningful comments on the draft EA if only fifteen (15) days are provided to do so. As such, the City of Rancho Palos Verdes respectfully requests that the public comment period for the draft EA be extended to at least forty-five (45) days.
2. The project area for this proposal excludes the sites of the former San Pedro and Palos Verdes Navy housing complexes, as well as portions of the DFSP San Pedro site that are leased for ball fields and a Los Angeles Police Department (LAPD) shooting range. However, the portions of the site utilized by the Palos Verdes Peninsula Land Conservancy (PVPLC) for a native plant nursery and captive breeding program for endangered Palos Verdes blue butterflies do not appear to have been excluded. PVPLC's operations at DFSP San Pedro are of vital importance to habitat preservation and restoration efforts on the Palos Verdes Peninsula. The draft EA should address both the on- and off-site biological

resources impacts of any changes to PVPLC's operations at DFSP San Pedro that may result from its full or partial closure.

3. We noted at the scoping meeting that there was an apparent discrepancy between the disposition of the underground concrete storage tanks between Alternatives 1 and 2. While both alternatives noted that these tanks would be abandoned in place, Alternative 1 stated that they would be filled with inert material but Alternative 2 only stated that they would be abandoned. We were told that the tanks would be filled under both alternatives, but this needs to be clarified in the draft EA.
4. Alternatives 1 and 3 describe the existing office and administration buildings being maintained in "caretaker" condition, while Alternative 2 describes them as being maintained in "as is" condition. The draft EA should clearly describe what these terms mean.
5. It seems clear that each of the proposed alternatives will result in varying levels of disturbance and disruption of the site. The draft EA should quantify the environmental impacts of each of these alternatives in terms of:
 - a. Quantities and depths of earth movement (i.e., cut, fill, import and export)
 - b. Number and routing (i.e., Gaffey Street vs. Western Avenue) of truck trips
 - c. Air quality, noise and hazardous materials exposure for sensitive receptors
6. We understand that the proposed project does not address the future use of the property in the event of its eventual disposal by the Navy. Nevertheless, we would like to see the draft EA address in general terms the possible future use(s) that might be suitable on the property (in terms of the exposure of future employees, visitors or residents to environmental conditions) under Alternatives 1, 2 and 3.

Again, thank you for the opportunity to comment upon this important project. If you have any questions or need additional information, please feel to contact me at (310) 544-5226 or via e-mail at kittf@rpvca.gov.

Sincerely,



Kit Fox, AICP
Senior Administrative Analyst

cc: Mayor Jim Knight and Rancho Palos Verdes City Council
Doug Willmore, City Manager
Carolynn Petru, Deputy City Manager

M:\Border Issues\DFSP San Pedro Closure\20150401_EAComments.docx

10 April 2015

Malinda Stalvey
Environmental Planning Team
Metropolitan Water District
PO Box 54153
Los Angeles, CA 90054

SUBJECT: Comments in Response to the Notice of Intent to Adopt a Mitigated Negative Declaration for the Palos Verdes Reservoir Upgrades Project

Dear Ms. Stalvey:

The City of Rancho Palos Verdes appreciates the opportunity to comment upon the proposed Mitigated Negative Declaration (MND) for the above-mentioned project. We have reviewed the MND, and offer the following comments:

1. The Project Description in the Initial Study (pp. 1-16) raises several questions:
 - a. What are the two (2) MWD member agencies that will be reconnected to the reservoir after the upgrades are complete?
 - b. What will be the new maximum capacity of the reservoir after the upgrades are complete?
 - c. Is a back-up generator or other emergency power supply for the reservoir proposed as a part of the upgrade project? If not, why not?
 - d. It is our understanding that the Chandler Quarry in Rolling Hills Estates no longer accepts construction and demolition material. If this is the case, what will be the destination for this material?

2. The discussion of Hydrology and Water Quality impacts in the Initial Study (pp. 50-53) concludes that impacts related to the exposure of people and structures to risk of loss, injury or death due to flooding resulting from a failure of the reservoir will be less than significant, and no mitigation measures are recommended. However, the inundation map for the Palos Verdes Reservoir prepared by MWD in the 1970s (see enclosure) clearly shows that portions of Green Hills Memorial Park and the *Rolling Hills Riviera* neighborhood in Rancho Palos Verdes could be flooded to depths of up to ten feet (10') in the event of a catastrophic failure of the reservoir. We understand that part of the purpose of the proposed project is to upgrade the

reservoir to current safety standards. Nevertheless, the City of Rancho Palos Verdes respectfully requests the inclusion of the following mitigation measures as a part of the MND:

- a. MWD shall prepare an updated inundation map for the Palos Verdes Reservoir, based upon its expected maximum capacity after the completion of upgrades. A copy of this map shall be provided to the City of Rancho Palos Verdes and first responders (i.e., Los Angeles County Sheriff and Los Angeles County Fire) for emergency preparation, planning and response purposes.
 - b. MWD shall develop, in conjunction with the City of Rancho Palos Verdes and first responders, a system for emergency public notification of downstream residents in the event that an imminent failure of the reservoir is observed, either as a result of routine inspection or an unusual event (e.g., earthquake, etc.).
3. The discussion of Transportation/Traffic in the Initial Study (pp. 67-71) concludes that construction traffic entering and exiting the project site could have a significant impact upon the safety of recreational trail users along Palos Verdes Drive North and Palos Verdes Drive East, and recommends the use of flagmen and guards as a mitigation measure. The City concurs with this assessment, but would also point out that the segments of Palos Verdes Drive North and Palos Verdes Drive East adjacent to the reservoir are a part of a major commuter route for Palos Verdes Peninsula residents. The City of Rancho Palos Verdes respectfully suggests that the use of flagging operations should be expanded to include motorists as well, particularly during peak morning and evening commute hours.

Again, thank you for the opportunity to comment upon this important project. If you have any questions or need additional information, please feel free to contact me at (310) 544-5226 or via e-mail at kitf@rpvca.gov.

Sincerely,



Kit Fox, AICP
Senior Administrative Analyst

cc: Mayor Jim Knight and Rancho Palos Verdes City Council
Doug Willmore, City Manager
Carolynn Petru, Deputy City Manager
Tracy Bonano, Emergency Services Coordinator
Nicole Jules, Deputy Director of Public Works