

Peninsula Community Planning Board  
P O Box 7994 San Diego, CA 92167

NBPL Miramar Pipeline EA Project Manager  
Naval Facilities Engineering Command, Southwest  
Attention: (RUE20.TB)  
2730 McKean St., Bldg. 291  
San Diego, CA 92136-5198

**SUBJECT: US Navy Environmental Assessment for the Miramar Pipeline Repair Project**

The Peninsula Community Planning Board (PCPB) understands the U.S. Navy will be preparing an Environmental Assessment (EA) to assess whether repairing and relocating the Miramar Pipeline would have significant environmental effects. The Miramar Pipeline is a Navy-owned and operated fuel pipeline extending 17.3 miles between Fleet Logistics Center San Diego (located at Naval Base Point Loma in the Peninsula Community Plan Area off Rosecrans Street) and Marine Corps Air Station Miramar in San Diego. The pipeline was built in 1954, with a 30 year design life, and provides fuel for Navy ships and aircraft. In 2012, approximately 100 million gallons of fuel were transferred via the Miramar pipeline.

According to information provided at the public scoping meeting conducted by the Navy, approximately 4.5 miles of the Miramar pipeline are in need of repair or relocation to address pipeline anomalies, such as dents, corrosion and metal loss, increase seismic safety and support the Navy's current and future fueling needs. Most pipeline anomalies occur between Naval Base Point Loma and Lytton Street. Under the proposed action, this length of pipeline (3.5 miles) would be relocated within the Rosecrans Street right-of-way.

To address erosion issues along the LaPlaya waterfront from McCall Street to Talbot Street, the pipeline would be relocated within the Rosecrans Street right-of-way.

Rosecrans Street is the major arterial that runs through the Point Loma community between Interstate (I) 5 and Canon Street, and is a critical transportation link for residents, students, employees, and visitors in the Point Loma community.

The PCPB appreciates the opportunity to provide comments on the scope of the proposed EA being prepared for this project and provide the following comments.

**COMMENTS**

1. The EA needs to address the construction timeline, construction hours and days, whether nighttime construction will be conducted, and how access along Rosecrans Street will be maintained to existing residences and businesses during construction to ensure minimal disruptions to the traveling public during the construction phase.
2. The EA needs to address what traffic control plans will be implemented to avoid traffic delays along Rosecrans Street during construction.

3. The EA needs to address whether the pipeline in the LaPlaya waterfront will be removed or left in place after the proposed relocation, and what measures will be implemented during this process to avoid, reduce, and minimize potential risks to public health and safety from discharges of fuel during this relocation.
4. The EA should address if there are alternatives to relocation along Rosecrans Street.
5. The EA needs to address whether public access to the LaPlaya waterfront will be maintained during pipeline relocation. This area is actively used by residents and visitors and for access to San Diego Bay.
6. It is our understanding that between 2002-2005, there were jet fuel leaks totaling 500,000 gallons at the Navy's Point Loma Fuel Tank Storage Facility that reached within yards of San Diego Bay. The Community was not made aware of the full extent of the spill. As a result of these leaks and with a view to preventing further catastrophic fuel leaks, the Navy agreed to supply prompt data and findings concerning the Fuel Storage Facility and the MCAS Fuel Pipeline to community organizations, stake-holders, and the public in general in order to restore confidence in the Navy rehabilitation of the Fuel Facility.

However, we note several examples of Navy decisions made between 2010-2013 to not disclose to the community fuel spill logs, pipe inspection reports, and options for the fuel pipeline.

#### EXAMPLES

- a. Navy Oil Spill Logs 2004 - 2013. Navy claims these are confidential. (Navy refused to supply Oil Fuel Spill Logs to Community Groups) (5 requests)
  - b. Navy refuses to supply August 2008 - P.I.G. Report and how it complied with report recommendations to Community Groups) (4 requests)
  - c. Navy did not accept request to meet/present to PCPB on the project.
7. The EA should identify the locations of identified pipeline defect areas.

The PCPB appreciates the opportunity to provide comments on the scope of the proposed EA for this project and look forward to receiving the Draft EA for review. We would appreciate a presentation by the Navy to PCPB on this project which greatly affects our community. Please direct any questions on these comments to me at: [pcpbem@gmail.com](mailto:pcpbem@gmail.com).

Sincerely,



JULIA M. QUINN, Chair  
Peninsula Community Planning Board