



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND SOUTHWEST
1220 PACIFIC HIGHWAY
SAN DIEGO CA 92132-5190

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Ser 00/072
December 20, 2005

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Mr. Michael J. Boyle, Chief
Gas Branch 1, Div of Gas-Environment & Engineering
Federal Energy Regulatory Commission
888 First St. NE.
Washington, DC 20426

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FEDERAL ENERGY REGULATORY COMMISSION

Dear Mr. Boyle:

This letter is to provide you with a formal Department of the Navy response with attached comments on the DEIS/DEIR for the proposed Long Beach LNG Project previously submitted to you via e-mail 8 Dec 2005.

We do have serious concerns with the DEIS/EIR, as it does not adequately identify our DON assets and operations in the proximity of the proposed LNG facilities. Our facilities are critical to maintaining our national defense mission. Therefore, the project does not adequately evaluate and provide mitigation for potential significant impacts.

We recommend a meeting with FERC, POLB, Coast Guard and other appropriate representatives to further discuss our concerns and provide relevant information on our operations and facilities for inclusion into the next iteration of the environmental document.

My point of contact for this project is Ms. Sheila Donovan who can be reached at (619) 532-1253 and by e-mail, sheila.donovan@navy.mil.

M. S. BOWERS
CAPT, CEC, USN
Commanding Officer
Acting

DON Comment/Resolution Matrix
December 6, 2005

Long Beach LNG DEIS/EIR
October 2005

1.		General Comment	DON assets in proximity to the proposed LNG terminals were not adequately identified nor analyzed in the DEIS/EIR. Due to the critical nature of these DON assets in proximity to the proposed project, we request that the DEIS/EIR specifically address and analysis the adjacent Mole Pier (Pier 12) Fuel facilities and operations to include the San Pedro Fuel Farm (and associated pipelines/infrastructure), Navy Anchorages D-7 and D-8 and potential impacts our off-shore ranges from proposed LNG tanker routes.
2.		General Comment	Due to concerns with potential impacts to our facilities and ranges, we request that a FEIS screen check be made available for our review before publication of the FEIS/EIR.
3.		General Comment	Graphics: please identify DON fuel facilities and other DON facilities on all appropriate graphics in the document
4.	ES	ES-4	Include a summary of impacts on DoN facilities and operational capabilities in Executive Summary discussion.
5.	2		Discussion about BHP Billiton and other LNG Projects did not include existing transit/shipping routes. Recommendation: provide a map/graphics of existing or proposed route of LNG ships from the origination point to the LNG facility at Long Beach.
6.	3, Section 3.3.3.3	3-26	Discussion regarding Navy Mole Pier did not include existing DoN operations. Recommendation: analyze and discuss active Navy fuel pier (pier 12) and importance of operations to National Security.
7.	3	Table 3.3.3-2	Comparison of Alternative LNG Terminal Sites Recommendation: Add a row in "feature" column indicating the Navy fuel pier (pier 12) and analyze the proposed alternatives and effects on DoN operational capabilities.
8.	3		Preferred site was identified, however, no discussion or analysis was included in the report.

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			Recommendation: Include analysis and preferred site discussion in the report.
9.	4, section 4.5	4-46	<p>Include DoN fuel facilities in land use discussion and consistency with operational capabilities.</p> <p>Recommendation: Create a separate section identifying analysis and discussion pertaining to Navy fuel pier and pipeline.</p>
10.	4	4-47	<p>Second paragraph, second sentence, states "The... Navy Mole was closed in 1994..." This is incorrect, most of the Navy Mole pier was indeed closed, but the fuel pier is leased to DESC and is very much open and active. Please revise this section to include analysis our facilities. The current text would leave one to believe there is no impact to DON facilities.</p>
11.	4, Section 4.7; 4.11.7.2	4-88	<p>The DEIS/DEIR did not address the impacts of LNG ship traffic on DoN operational capabilities.</p> <p>Recommendation: perform analysis identifying effects on DoN tankers and other DoN operational capabilities while LNG ship is in transit to the LNG facility within breakwater point and the Long Beach Port. Separate DoN traffic to commercial and discuss impacts.</p>
12.	4	4-89	<p>First paragraph, near end, states "Tankers chartered by the Navy occasionally use the West Basin to access its fuel pier on the Navy Mole." This statement is incorrect, the Navy does not charter fuel tankers, the Defense Energy Support Center does. DESC brings up to 30 tankers per year in, most of which are part of the DoN fleet. The sentence should read "The Defense Energy Support Center brings up to 30 fuel tankers per year into the West Basin for discharge into the San Pedro Defense Fuel Supply Point via the pier on the Navy Mole. This tanker traffic is of national defense interest and will require priority treatment at all times."</p> <p>Mitigation Recommendations: 1. Procedural change that gives DESC tankers the right of way at all times over LNG vessels. The Port Authority and the LNG plant must agree in writing and in advance that LNG ships will hold outside the West Basin if a DESC tanker is discharging in port OR 2. Negotiate with LNG developers to build a new DESC discharge pier on the outside of the West Basin, on the opposite side of the Navy Mole. A new pier outside of the exclusion zone would allow DESC to receive fuel and the LNG plant to discharge LNG at the same time with no restrictions.</p>
13.	4,	4-148	Expand discussion regarding standoff/security/buffer distance

	Section 4.11.7		Recommendation: Include expanded standoff/security/buffer distance discussion in sections 4.11.7 and 4.11.8 and identify where the requirements are applicable (i.e., while moored, in transit at the Long Beach Port, 3 NM, 12 NM, open waters).
14.	4, Section 4.12	4-197	<p>The DEIS/DEIR did not address the cumulative impacts of proposed LNG projects discussed in section 2 re: ship, LNG facility, traffic/congestion, etc. on DoN operational capabilities to include potential impacts to our off-shore training ranges.</p> <p>Recommendation: identify and analyze cumulative impacts of LNG ship, LNG facility, traffic/congestion, and other LNG ships on DoN facilities at the Navy fuel pier (pier 12), pipe lines leading to the fuel farm, and ranges (i.e., Point Mugu Sea Range and SOCAL).</p>
15.	Appendix F, Section 2.2.2. Table 4-2, Table 4-5	4-2 thru 4-4	<p>Description of intentional events. Addresses large commercial aircraft but does not address small private aircraft loaded with explosives. This area has a significant number of small aircraft including, near by LB Airport.</p> <p>Recommendation: Provide a hazard analysis and graphics of explaining impact on Navy Anchorages D-7 and D-8, Fuel Pier and San Pedro fuel farm.</p>
16.	Appendix F, Section 4.9.2-2; Table 4-11; Table 4-12	4-25; 4-32; 4-103	<p>Location of nearest Sensitive Receptors. The DEIS/DEIR does not include all DON exposed sites.</p> <p>Recommendation: Add the following to DON exposed sites Navy Explosive Anchorages D-7 and D-8, Fuel Pier and San Pedro fuel farm. Include exposed sites in hazard analysis and graphics.</p>
17.	Appendix F, Section 4.7.3	4-35	<p>The DEIS/DEIR does not include all site- specific vapor dispersion analysis to account for local conditions.</p> <p>Recommend: Provide site specific vapor dispersion analysis to account for local conditions to better determine the likely extent of dispersion. Address the impact on Navy Explosive Anchorages D-7 and D-8, DESC fuel farm.</p>
18.	Appendix F,	5-1	Hazards Analysis to Neighboring Facilities: Could not assess the potential impacts of Proposed LNG facility on DoN fuel pier (i.e., impacts of radiant energy and overpressure

	Section 5		<p>on structures and plant equipment).</p> <p>Recommendation: provide an explanation and analysis of graphics contained in Appendix F relating to the DoN fuel pier and possible moored DoN tankers in the process of off-loading within the vulnerability zone.</p>
19.	Appendix F, Section 6	6-1	<p>Worst-Case Hazards Associated with Other Flammable Fuel Facilities: Could not assess the potential impacts of Proposed LNG facility on DoN fuel pier.</p> <p>Recommendation: provide an explanation of graphics contained in Appendix F and its effects relating to the DoN fuel pier, possible moored tankers in the process of off-loading within the vulnerability zone, the existing fuel lines leading to the DoN fuel farm, and chain-reaction impact scenario which includes TOSCO facility and San Pedro Fuel Farm.</p>