

# Scoping Meeting Summary Report April 17-20, 2007

## Environmental Impact Statement/Overseas Environmental Impact Statement for Relocating Marines from Okinawa to Guam, Transient CVN Berthing, and Placing an Army BMD Task Force on Guam



June 2007



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for  
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Transient CVN Berthing,  
and Placing an Army BMD Task Force on Guam

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## **ACRONYMS AND ABBREVIATIONS**

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AFB	Air Force Base
BMD	ballistic missile defense
CCC	Colonized Chamoru Coalition
CEQ	Council on Environmental Quality
CMTF	Civilian-Military Task Force
CNMI	Commonwealth of the Northern Mariana Islands
CVN	nuclear aircraft carrier
DFW	Division of Fish and Wildlife, Commonwealth of the Northern Marinas Islands
DISID	Department of Integrated Services for Individuals with Disabilities, Guam
DoD	Department of Defense, United States
DoDEA	Department of Defense Education Activity
DON	Department of the Navy, United States
DRT	Department of Revenue and Taxation, Guam
EIAP	environmental impact analysis process
EIS	environmental impact statement
EJ	environmental justice
EO	Executive Order
EPA	Environmental Protection Agency, United States
GCA	Guam Contractors Association
GCOC	Guam Chamber of Commerce
GEPA	Guam Environmental Protection Agency
GIAA	Guam International Airport Authority
GovGuam	Government of Guam
GPA	Guam Power Authority
GPSS	Guam Public School System
GWA	Guam Waterworks Authority
HEA	habitat equivalency analysis
JGPO	Joint Guam Program Office
MYC	Marianas Yacht Club
NCTS	Naval Computer and Telecommunications Station
NEPA	National Environmental Policy Act
NGO	non-government organization
NHP	National Historic Park
NOI	notice of intent
NPDES	National Pollutant Discharge Elimination System
OEIS	overseas environmental impact statement
POE	point of entry
PPE	personal protective equipment
PTSD	Post Traumatic Stress Disorder
QOL	quality of life
U.S.	United States
USFWS	United States Fish and Wildlife Service
USMC	United States Marine Corps
WRMP	Water Resources Master Plan, Guam Water Authority
WWTP	waste water treatment plant



## **1.0 THE SCOPING PROCESS**

### **1.1 Introduction**

This report summarizes the public scoping process for the Environmental Impact Statement/Overseas Environmental Impact Statement (EIS/OEIS) being undertaken by the Navy for relocation of United States Marine Corps (USMC) units, herein referred to as Marines, from Okinawa, Japan to Guam; transient nuclear aircraft carrier (CVN) berthing at Naval Base Guam; and placement of a United States (U.S.) Army ballistic missile defense (BMD) task force on Guam. It presents a summary of comments made at the scoping meetings held April 17–20, 2007 on Guam (two locations), Saipan, and Tinian. Also included in this report is a summary of comments provided by postmarked mail and e-mails received on or before May 21, 2007.

Scoping is an important aspect of the National Environmental Policy Act (NEPA) process. Scoping not only informs the government agencies, interest groups, and general public about the proposed action but identifies the issues and concerns that are of particular interest to the affected populace. This information is then used to assist resource specialists in data collection and analysis for the development of the draft EIS/OEIS.

The scoping process objectives for the EIS/OEIS include:

- Helping the public, elected officials, and agencies gain a clear understanding of the purpose of the NEPA process and associated EIS/OEIS.
- Clearly communicating the public's role in the EIS/OEIS decision-making process, and clarifying the type of public input that will be most relevant and useful.
- Identifying opportunities before and during the EIS/OEIS process for building trust, improving relations, and strengthening the military's credibility with its stakeholders.
- Developing two-way communication with the public to facilitate information sharing.
- Providing a "user-friendly" approach to obtaining public and agency input, suggestions, and mitigation options for consideration in the EIS/OEIS.
- Developing an inclusive, efficient, and cost-appropriate program for disseminating information to stakeholders who already have a heightened level of expectations due to visits and promises already made by U.S. government officials.
- Complying fully with NEPA requirements, Council on Environmental Quality (CEQ) regulations, Department of Defense (DoD) instructions, and Executive Orders (EOs) to ensure stakeholder involvement throughout the EIS/OEIS process.

All comments received during the scoping period are consolidated in this report in order to identify environmental issues/concerns that the Navy should consider during the Environmental Impact Analysis Process (EIAP) and associated EIS/OEIS. Comments received after the scoping period (April 17, 2007 – May 21, 2007) may also be considered during preparation of the draft EIS/OEIS, but are not included in this summary.

Supporting documentation for the scoping meeting and comments are provided in the following appendixes:

- Appendix A presents copies of the Notice of Intent (NOI) to prepare an EIS/OEIS, published in the *Federal Register* on March 7, 2007 and the notice of revised deadline for scoping comments for the EIS/OEIS published in the *Federal Register* on May 4, 2007.
- Appendix B contains the scoping meeting notification advertisements.
- Appendix C presents the scoping meeting mailer sent to stakeholders, including elected officials; federal, state, and local agencies; non-government organizations (NGOs); and trade organizations.
- Appendix D presents the list of addressees to whom the scoping meeting mailer was sent prior to the scoping meetings.
- Appendix E contains the exhibits that were presented at the scoping meetings, including poster panels and a 10-minute looping PowerPoint presentation. (Note: the narrated PowerPoint presentation is contained on the enclosed CD).
- Appendix F contains the facts sheets that were made available to attendees at the scoping meetings to take home.
- Appendix G contains the actual comments received during the scoping period of April 17, 2007 – May 21, 2007.
- Appendix H contains representative excerpts from comments received during the scoping period by resource subject.

## 1.2 Scoping Period

The Joint Guam Program Office (JGPO) hosted open house public scoping meetings on the islands of Guam (two locations), Saipan, and Tinian to solicit comments for consideration in determining the scope of the EIS/OEIS that is being prepared for relocation of Marines units from Okinawa, Japan to Guam; transient CVN berthing at Naval Base Guam; and placement of an U.S. Army BMD task force on Guam. It should be noted the original dates for the scoping meetings on Guam, Saipan, and Tinian were April 3, April 4, and April 5, 2007; respectively. The scoping team was on the island of Guam to conduct the first scoping meeting when Typhoon Kong-Rey passed through the islands. The typhoon was tracking to hit Guam, and a curfew was placed on residents and visitors. Subsequently, the scoping meetings were cancelled and re-scheduled for April 17–20, 2007. Numerous announcements were made to alert the public of the change in the dates of the scoping meetings. Additionally, at the request of the Governor of Guam, a second meeting on Guam was scheduled. Further, the Governor requested that the two scoping meetings be held at community centers rather than at hotels. Because the meetings were re-scheduled, the public scoping comment deadline was extended from May 1, 2007 to May 21, 2007. A notice of the revised deadline for scoping comments for the EIS/OEIS was published in the *Federal Register*.

Open house public scoping meetings were held at the following dates, times, and locations:

- Tuesday, April 17, 2007 from 5:00 pm – 9:00 pm, Yona Community Center, next to the Mayor's office, Guam
- Wednesday, April 18, 2007 from 5:00 pm – 9:00 pm, Dededo Senior Citizens Center, next to the Mayor's office, Guam
- Thursday, April 19, 2007 from 5:00 pm – 9:00 pm, Multi-Purpose Center, Beach Road, Susupe, Saipan

- Friday, April 20, 2007 from 5:00 pm – 9:00 pm, Tinian Elementary School Cafeteria, San Jose, Tinian



## 2.0 SCOPING MEETING NOTIFICATIONS AND MAILINGS

The scoping meetings were advertised extensively, using multiple methods to notify the public. In particular, the Navy used four main methods to disseminate notice of the scoping meetings:

- Publication of a NOI in the *Federal Register*
- Publication of meeting notification advertisements in local newspapers
- Mass mailings
- Other avenues

Each of these methods is discussed in more detail below.

### 2.1 Notice of Intent

The scoping process for the EIS/OEIS began with the publication of a NOI in the *Federal Register* on March 7, 2007 (72 FR 10186). That notice announced the Navy's intent to perform an EIS/OEIS to evaluate potential environmental impacts associated with the following:

- relocation of Command, Air, Ground, and Logistics units (which includes approximately 8,000 service members and 9,000 family members) from Okinawa, Japan to Guam;
- relocation of Marines units, including operations, training, and infrastructure changes;
- enhancement of the infrastructure, logistic capabilities and improve pier/waterfront facilities to support transient CVN berthing at Naval Base Guam; and
- placement of a BMD task force (approximately 630 service members and 950 family members) on Guam.

A copy of the March 7, 2007 NOI is presented in Appendix A.

### 2.2 Newspaper Notification Advertisements

The meetings were announced in three local newspapers: *Pacific Daily News*, Guam; *Marianas Variety*, Saipan; and *Saipan Tribune*, Saipan. Importantly, these advertisements were published the weekend prior to the scoping meetings and throughout the week. This timing ensured that readers would be alerted to the meetings immediately prior to their occurrence so that the meetings would be fresh in their minds. The dates of each advertisement are listed in Table 2-1. Copies of the newspaper notification advertisements are presented in Appendix B. The newspaper announcements for the initial scoping meetings that were re-scheduled are not included.

**Table 2-1: Dates of Newspaper Notification Advertisements for Scoping Meetings**

Island(s)	Newspaper	Dates of Advertisement
Guam	<i>Pacific Daily News</i>	April 14–18, 2007
Saipan	<i>Marianas Variety</i>	April 13, 16, and 17, 2007
Saipan	<i>Saipan Tribune</i>	April 15–19, 2007

### **2.3 Mailer**

Elected officials; federal, state, and local government agencies; NGO representatives; and other persons anticipated to be interested in the EIS/OEIS were sent mailers that described the proposed action and the scoping process and presented the scheduled scoping meeting dates and locations. Approximately 130 mailers were mailed on March 24, 2007. A copy of the mailer is included in Appendix C and a copy of the mailing list is included in Appendix D.

### **2.4 Other Avenues**

In addition to the NOI, newspaper announcements, and mailer, the scoping meetings were advertised via short news advisories and public service announcements that were developed by the JGPO and e-mailed/faxed to local print, television, and radio media venues. Public service interviews with key JGPO personnel were conducted. Local newspapers, *Pacific Daily News* and *Saipan Tribune*, also published their own announcements throughout the scoping period.

### **3.0 SCOPING MEETINGS**

#### **3.1 Meeting Format**

The scoping meetings were designed in an “open house” format to create a comfortable atmosphere in which attendees could speak one-on-one with Navy personnel. Attendees were welcomed at the entrance by greeters who thanked them for coming and directed them to the sign-in table. After an attendee signed in, the greeter explained that the purpose of the meeting was to explain the Navy’s proposed action and to get a record of attendees’ concerns and interests. The greeters identified the Navy representatives who were there to speak with attendees and explained the layout of the meeting room, making a particular effort to identify the area where attendees could provide written or oral comments.

Displays included a slide show and poster exhibits informing viewers of the proposed action, the EIAP, the items to be addressed in the EIS/OEIS, and the NEPA process. Handouts were available to all attendees.

#### **3.2 Slide Show**

A 10-minute looping PowerPoint presentation was displayed continuously during the scoping meeting. The narrated presentation described the scoping meeting open house format, the proposed action, and the NEPA process; explained how the public can comment during the EIAP process; and identified points of contact. The narrated PowerPoint presentation is contained on the enclosed CD.

#### **3.3 Exhibits**

Visual exhibits, such as poster panels, are designed to be interactive and enhance information exchange. Thirteen poster panels were developed to communicate succinctly the JGPO’s message to the public. The poster panels were displayed on easels at three distinct stations, as follows:

- Station 1 – Proposed Action
  - Poster 1 – Proposed Action Overview
  - Poster 2 – Purpose and Need for Action
  - Poster 3 – Proposed Action for the Marines
  - Poster 4 – Proposed Action for the CVN and BMD
  - Poster 5 – Overview of the Island of Guam
  - Poster 6 – Overview of the Commonwealth of the Northern Mariana Islands (CNMI)
- Station 2 – Items To Be Considered in the EIS/OEIS
  - Poster 1 – Factors of Interest of the Community that the EIS/OEIS Will Address
  - Poster 2 – DoD is a Committed Steward to the Environment
  - Poster 3 – Environmental Factors that the EIS/OEIS Will Address
- Station 3 – NEPA Process
  - Poster 1 – Scoping Process
  - Poster 2 – Opportunities for the Public To Comment During the EIS/OEIS Process
  - Poster 3 – How the Public Can Comment on This Project

– Poster 4 – Invited Cooperating Agencies

Most of the activity and discussion during the scoping meetings centered around these poster stations. The posters proved very effective in stimulating dialogue between the Navy and attendees and provided a “user-friendly” approach to obtaining public and agency input, suggestions, and mitigation options for consideration in the EIS/OEIS. A copy of the poster panels presented at the scoping meetings is presented in Appendix E.

### **3.4 Fact Sheets**

Four fact sheets were prepared as “take-aways” for attendees. The fact sheets were titled as follows:

- Proposed Action (in both English and Chamorro)
- EIS/OEIS (in both English and Chamorro)
- NEPA Process (in both English and Chamorro)
- Other NEPA Actions that are Ongoing on Guam

Appendix F contains a copy of the fact sheets that were presented at the scoping meetings.

### **3.5 Opportunities for Comment**

The Navy provided the public with several venues for commenting during the scoping process and at the meetings. Attendees could submit written comments they brought with them, complete a comment form provided by the Navy, write comments on flip charts set up on easels at each station, type comments into a computer set up at each station, or dictate their comments to a Navy representative, who entered them into the computer. A Chamorro translator was available at all meeting locations. A mailing address and an e-mail address were provided for those who wished to submit comments at any time during the comment period.

#### 4.0 SUMMARY OF SCOPING MEETING ATTENDANTS AND COMMENTS

The scoping meetings were very well attended. Table 4-1 summarizes the number of meeting attendees and number of comments received.

**Table 4-1: Summary of Meeting Attendants**

	<b>Meeting 1 Guam (Yona)</b>	<b>Meeting 2 Guam (Dededo)</b>	<b>Meeting 3 Saipan</b>	<b>Meeting 4 Tinian</b>
Estimated Attendance	300	300	120	70
Signed-in Attendance	156	124	81	47
Number of Comments Received	68	77	16	21

The scoping process to date has generated 990 comments, both at the scoping meetings themselves and via U.S. mail and e-mail during the remainder of the comment period. The deadline for comments was extended from May 1, 2007 to May 21, 2007.

This section addresses the comments in four ways:

- In terms of subject matter, the comments concern 28 major resource areas. Table 4-2 lists each resource area and the number of comments received on it. In cases where numerous comments were received on specific topics within a major resource area, the matrix was subdivided accordingly.
- The key issues and concerns reflected in the comments are summarized in Section 4.3 by resource area in the order shown in Table 4-2.
- Appendix G contains a complete set of the comments received. The comments are organized within that appendix under six headings reflecting the comments received at the individual scoping meetings and those that were received during the comment period by mail or e-mail, i.e., Yona, Dededo, Saipan, Tinian, post-mail, and e-mail comments. Four subheadings within each section further organize the comments by source: Federal Department/Agency, Territory Department/Agency and/or CNMI Department/Agency, Other Organizations, and General Public.
- Appendix H contains excerpts from the comment documents that supplement the summary text in this section. These excerpts are organized by resource area in the order shown in Table 4-2.

The issues discussed at the scoping meetings and in written comments submitted to the JGPO during the scoping period are summarized here as they were presented by the commentors and do not imply endorsement or acceptance by the JGPO.

#### 4.1 Scoping Meeting Attendants

At the scoping meetings, reaction of the attendees was largely positive, with some evidence of outward opposition. On Guam, observers noted that attendees were supportive with a few exceptions and that representatives of the Government of Guam appeared favorable, if moderate in their position at both meetings held on the island. On Saipan, there was no outward evidence of opposition. One meeting attendee expressed concern about sufficient protection for the cultural

heritage sites, and stated support for the purpose and need if the Navy carefully recorded cultural heritage sites that have been or might be changed or destroyed. On Tinian, attendees supported the proposed action, and engaged JGPO representatives in conversations about the possibility of a warm base on the island.

Concerns and interests heard in conversation at the scoping meetings centered on the subjects summarized below:

- Short- and long-term job opportunities on Guam and in the CNMI.
- Ability of Guam to accommodate the increased population.
- Impacts on education (drawing teachers from the local teaching pool and the desire for an integrated school system).
- Behavior of the Marines and associated safety issues.
- Continued access to and use of beaches, trails, and waters for fishing, and access to historic areas and memorials.
- Indigenous peoples' rights. Discussion about indigenous people's rights ranged from a few "Yankee go home" remarks to concerns about ensuring the Chamorro people's right to their land.
- The importance of trust. On Tinian, attendees commented that promises were made 30 years ago that some sort of military facilities would be established on Tinian and presence would be maintained. "We want the military to uphold their promise."
- Future state of the tourist industry and the importance of tourism to the economy. With the majority of the new military effort and population growth being focused on Guam, people expressed the desire to see the vacation dollars spread to other islands.
- Land use.
- Natural resources. Concerns were expressed about invasive species, degradation of the coral reefs and associated habitat and fisheries.
- Infrastructure. Concern that the population increase caused by relocating the Marines and their dependents would over-tax an already marginalized and failure-prone infrastructure.

#### 4.2 Summary of Scoping Meeting Comments

The issues discussed at the scoping meetings and in written comments submitted to the JGPO during the scoping period are summarized here as they were presented by the commentors and do not imply endorsement or acceptance by the JGPO.

**Table 4-2: Resource Matrix of Comments Received**

<b>Comment Type</b>	<b>Number of Comments</b>
<b>1. Access</b>	
a. To DoD facilities	6
b. To recreation areas	22
c. Apra Harbor	17
x. Other	2
<b>2. Social</b>	
a. Population increase and associated effects	18

<b>Comment Type</b>	<b>Number of Comments</b>
b. Effects on educational facilities	27
c. Effects on public health and social services	36
d. Respect for local values/people	20
e. Socioeconomics/quality of life	16
f. Mental health and substance abuse	5
g. Income levels and welfare system	4
h. Libraries	7
x. Other	24
<b>3. Economics</b>	
a. Labor-related issues	24
b. Small business opportunities	7
c. Effects on tourism	22
d. Military purchasing of goods locally	4
e. Competitive pricing (on-base vs. off-base)	4
f. Availability and cost of civilian housing	18
g. Improve economy	23
h. Use of local labor vs. bringing in off-island laborers/companies	7
x. Other	15
<b>4. Chamorro Interests</b>	7
a. Self-government	9
b. Cultural, historical, and archaeological	11
c. Ancestral lands and access	6
d. Cultural, historic, and transition education	5
e. Historic properties	5
f. Minoritization of Chamorros/demographic changes	9
x. Other	5
<b>5. Law Enforcement</b>	
a. Crime/prostitution	33
b. Violence against women and children	5
c. Overloading local police/law enforcement resources	13
d. Overloading local emergency response/paramedic resources	7
e. Overall safety	5
x. Other	15
<b>6. Infrastructure/Transportation Misc.</b>	26
<b>7. Increase in Traffic/Roads/Highways</b>	33
<b>8. Utility Requirements</b>	27
<b>9. Potable Water/Groundwater Recharge</b>	56
<b>10. Solid Waste/Recycling</b>	23
<b>11. Sanitary Sewer System</b>	25
<b>12. Noise</b>	
a. Air space management	6
b. Training (artillery ranges, helicopters)	14
x. Other	1
<b>13. Land Use Planning</b>	36
<b>14. Marine Resources</b>	11
a. Fish habitat, coral reefs, and marine mammals	18
b. Effects on local fisherman and the fishing industry	10
x. Other	1
<b>15. Ecological</b>	

<b>Comment Type</b>	<b>Number of Comments</b>
a. Endangered species	7
b. Invasive species	8
c. Native species	7
d. Natural resources	6
x. Other	5
<b>16. Air Quality</b>	8
<b>17. Surface Water</b>	5
a. Dredging and disposing requirements for Apra Harbor	7
b. Sewer outfalls	5
<b>18. Cumulative Impacts</b>	8
<b>19. Hazardous Materials/Hazardous Waste</b>	18
x. Other	5
<b>20. Proposed Action</b>	
a. Not enough information disclosed	16
x. Other	4
<b>21. International Safety</b>	21
<b>22. Use of Local Expertise/Community Members</b>	13
<b>23. Support of Relocation</b>	23
<b>24. NEPA Process</b>	28
<b>25. Radiation</b>	5
<b>26. Overloading of Regulating Agencies</b>	8
<b>27. Construction</b>	14
<b>28. Other</b>	19
<b>TOTAL</b>	990

### 4.3 Summary of Scoping Meeting Comments

**Source of Comments.** Many private citizens contributed comments. Comments were also received from elected officials and numerous organizations and agencies. The Joint Civilian-Military Task Force (CMTF) contributed detailed reports from their subcommittees on many of the resource areas. Most of these reports address the proposed action in terms of existing capability and the capacity of local agencies to accommodate the anticipated increase in demand for various services generated by the increase in both military and worker populations. Among the contributors were Felix P. Camacho, governor of Guam; Senators Judith P. Guthertz, Edward J.B. Calvo, and Vincente Pangelinan; the office of the mayor of Guam; Vincente Gumataotao, mayor of Piti; Jessie B. Palican, mayor of Barrigada and June U. Blas, vice mayor of Barrigada; and representatives of local, state, and federal agencies and organizations. A list of contributors appears in Appendix G

**Nature of Comments.** Many comments address the proposed project itself, rather than recommending an issue to be assessed in the EIS. In such cases, inferences were drawn from those comments for the sake of analysis. For example, if a commentator wrote “I am concerned about the impact of the increased population on the infrastructure,” the inference drawn in terms of the EIS was that the person wanted to be sure the EIS assessed the potential impacts to infrastructure.

Many concerns fall into areas covered by studies routinely performed as part of the EIS analysis process; for example, impacts to natural resources. Other concerns are specific to this project and the Navy is already aware of them. For example, concern was expressed about the potential for increase in crime associated with the anticipated increase in population. Discussion in the EIS of the

consideration given by the Navy to the issue and steps to be taken to mitigate concerns, as appropriate, will demonstrate that the Navy has heard the concern and is taking appropriate action.

#### **4.3.1 Access**

Forty-seven comments from Guam, Saipan, and Tinian reflected concern about the potential impact of the project on civilian access to DoD facilities, recreation areas, Apra Harbor, and other locations, both in terms of the impact of construction activity and actual implementation of the proposed action.

#### **DoD Facilities**

One commentor asked whether the DoD would allow local community access to beaches/parks on base at any time without the need for passes, thus reciprocating the hospitality of the local community to the military, who routinely use off-base beaches. Senator Guthertz recommended that the University of Guam have access to the bases to offer classes there. She also inquired how many civil service employees would be in Guam and whether they would have access to the Department of Defense Education Activity (DoDEA) school system, Navy Exchange, commissary, and military health care system.

The CMTF Subcommittee on Health and Social Services cited the need for access to military bases to transport clients for medical services, to conduct assessments for requested aging services, and to investigate cases of abuse against the elderly and adults with disabilities. The University of Guam School of Nursing, Social Work and Health Services expressed interest in collaborating with the Guam Naval Hospital for use of its facilities for training students.

The Guam Department of Agriculture requested that the DoD commit to allowing local and federal resources agencies access to project areas. The department indicated that it would require such access to conduct its own biological assessments of the project areas related to the proposed action and its alternatives. Further, the department indicated that independent assessments by local and federal trust resource agencies may need to be conducted to assist in determining alternatives or in decisions relating to compensatory mitigation.

#### **Recreational Areas**

Some commentors expressed concern about continued ability to access fishing and other recreation locations (e.g., beaches and diving spots) on Guam. Others expressed concern that increased access to these locations would contribute to the existing problems of over-fishing, changes in fish behavior due to feeding of fish by divers, trampling of coral, and so forth. The Port Authority of Guam wants the EIS to analyze the impacts of the CVN berthing and associated activities such as ordnance handling in terms of how they would affect or extend the explosive safety quantity distance arc, thus impacting civilian and recreational areas of the harbor.

One commentor recommended that the DoD release areas from what the person called “unwarranted controls” that limit civilian access (Ritidian and Glass breakwater); another person pointed out that this area is a valuable resource for the local community; and a third noted that “traditional user groups (U.S. citizens) have been alienated and discriminated [against]” in terms of recreational access. One commentor was concerned that the proposed action would impact access to the Ritidian Point Wildlife Refuge.

The Guam Department of Agriculture inquired whether the proposed action would impact recreational hunting in areas where hunting is allowed, and expressed concern that limiting hunting would increase deer and pig populations and further damage the already strained forest habitat. Guam Environmental Protection Agency (GEPA) was concerned about the numbers of additional active duty personnel, dependents, and military transients who would be competing with residents and tourists for use of recreational sites.

The mayor and vice mayor of Barrigada expressed concerns about the impact of construction, operations, and maintenance of the U.S. Army BMD task force on (1) public use of, and access to, two softball fields on Route 8A and (2) continued public access to, and use of, the Admiral Nimitz Golf Course and Club House.

Commentors from Tinian also expressed concern about the impact on recreational and small craft boating in their harbor.

### **Apra Harbor**

A number of members of the Marianas Yacht Club (MYC), members of a Japanese sailing club, and some commentors who did not list an affiliation expressed concern about access to Apra Harbor and the ability to continue recreational boating and boating events in the harbor, which is apparently the site of numerous local and international regattas, in addition to being heavily used by the local population. Also mentioned was the MYC location at Sasa Bay and concerns about access to mooring and anchorage locations. Another member asked what would be done to ensure that use of the harbor would not be restricted and that civilians would continue to have the same quality of life [in terms of recreational sailing] that they have always enjoyed.

The Guam Sailing Federation shared concerns about access to the harbor, stating that few safe sailing areas on Guam are deep enough for smaller sailing craft; besides Apra Harbor, the Cocos Lagoon is the only other protected large body of water, and usage of that lagoon is limited by its location at the extreme southern end of the island.

Other commentors were concerned about access to Apra Harbor in terms of potential impacts on fishermen. The Guam Department of Agriculture says fishermen have been denied access or given limited access in recent years and expressed concern about increasing impacts as a result of continued increase in the number of military projects on Guam.

### **Private Property, Cultural and Historic Sites, Tourist Sites, and Roads**

Several commentors on Saipan and Tinian pointed out that the tourist locations on Tinian are in the north where, as they understand it, the military activity is proposed. Their concern about access to those areas has to do with the impact on tourism and, therefore, on the economy.

Several commentors indicated concern about maintaining access to cultural and historic sites and to family property. The Guam Ancestral Lands Commission reported to the CMTF that the original landowners of parcels of land contiguous to military properties have experienced denial of access and denial of use of infrastructure. Observations from landowners along the north shoreline of Andersen Air Force Base (AFB) (Northwest Field) and the northwest side of Naval Computer and Telecommunications Station (NCTS) Finegayan say that access to these areas has been severely restricted since September 11, 2001. Several commentors had been denied access to their land and cited loss of development and tourism opportunities.

In terms of tourism, one commentor mentioned access to Double Reef, an area that has been discussed as a site for part of a firing range, and suggested an open/closed process similar to the one used in Hawaii when range activities could impact fishers.

Commentors are also concerned about civilian access to major roads, including Route 3A, which has previously been subjected to security restrictions that resulted in lack of access to some private property. One person observed that existing public rights-of-way “remain open, accessible, and unobstructed,” and that “there should be no ‘military roads’ in Guam except within a military base.”

**Mitigation.** Regarding impacts to Apra Harbor, one Guam resident asked whether the MYC would receive compensation for impacts. Another member asked whether the DoD could accommodate sailing event schedules if the club advised the military of its schedule in advance.

#### 4.3.2 Social

Approximately 16 percent of comments (157 comments) received pertained to social issues. Commentors on Guam, Saipan, and Tinian all had concerns related to social issues. Many commentors expressed general concern about the increase in population and its overall social impact.

#### Education

Twenty-seven commentors expressed the desire that the Navy assess the impact of military expansion on education, educational facilities, and teachers. The majority of these comments concerned Guam. One commentor from Tinian expressed general concern about the impact of the proposed action on their schools. Another from Tinian indicated that the DoD would need to assist in improving their schools, and a third commented that money would be coming into the school system.

Senator Guthertz submitted a letter presenting specific points concerning education. The senator indicated the need to assess higher education requirements that would result from the increased military and dependent population and recommended that the long-range goal for primary and secondary education on Guam be one integrated school system. Other commentors also specifically requested that the DoD work toward one integrated school system on Guam. One commentor stated that all plans for addition to DoDEA schools should be included in the EIS, including the potential willingness of the military to work with the local government in building partnerships with the Guam Public School System (GPSS) and to develop a charter school and any plans to send dependent children to Guam public schools.

Commentors expressed concern that the DoD will establish/enhance its own schools only; others stated that they want the DoD to invest in improving schools overall. There is also concern that the DoD schools would deplete the resources of the local teacher pool. To assess the impact on education, the CMTF requested extensive information, including planning factors for DoD civilians, their dependents, contractors and family members, and Pacific region migration growth between 2008 and 2014 by elementary, middle, high school, and higher education age groups; where these groups will live; length of contractors’ stays on Guam; and anticipated special education facility, sports facility, and vocational/technical training planning requirements, among other items.

Commentors expressed concern about the impact of contractors’ and workers’ families on non-DoDEA schools.

Two commentors suggested the Navy and Marines partner with the schools by sending speakers into the classrooms to explain the military and its mission to the students and to talk about the types of job opportunities that might be available through the military. A teacher from the Commonwealth of Northern Mariana College, a vocational college, suggested an office on Saipan to provide work/study/internship opportunities, indicated that the college could “ramp up” to support staffing needs related to the project, and offered to assist with research, computer tasks, and special studies.

### **Health Facilities and Social Services**

Significant concern (36 specific comments) was expressed about impacts on health facilities and social services in terms of strain on the facilities, staff, and resources of health and social service agencies on Guam. Most of these agencies are already stretched to the limits of their capacity and are hindered from expansion by financial constraints (i.e., lack of funding for facilities, equipment, and salaries) and an inadequate labor pool.

The CMTF Subcommittee on Health and Human Services emphasizes the need to assess integration of military and civilian health and social support structures, and discusses various potential impacts to Guam’s “already fragile health and social service system infrastructure.” The subcommittee anticipates that the number of persons who have difficulty getting adequate medical care will triple, resulting in problems of family stability and well-being, and that the shortage of pharmacists on the island will be exacerbated, putting a strain on access to medication in the community. The subcommittee report recommends identifying and maximizing synergies and cost efficiencies in utilizing joint resources to improve health care and social services (e.g., shared funding and resources). The report lists questions to be pursued with the DoD and requests that the EIS examine the impact on the community of military expansion with regard to drug and alcohol abuse, the provision of related services, provision of disability services, and other specifics that are detailed in the text of the document in Appendix G.

The Department of Integrated Services for Individuals with Disabilities (DISID) expressed concern that increased demand for respite care for caregivers of individuals with disabilities would exhaust local funds. DISID is also concerned about the Supreme Court Olmstead Decision of 1999 mandating the integration of developmentally disabled customers in state hospitals and mental institutions into community-based services, including the broad issue of compliance with the Americans with Disabilities Act, both in terms of the financial burden this would generate under current conditions and in terms of impacts of added population connected with the military expansion.

Comments from Guam, Saipan, and Tinian expressed concern about the impact of the military expansion on specific health issues as follows:

- Risk of communicable diseases from workers coming to Guam; a recommendation for public health offices at the airport and port.
- Potential for increased incidence of Post Traumatic Stress Disorder (PTSD) on Guam and the related potential need for mental health counseling, given the current attention to PTSD.
- Increase in the number of veterans on Guam, related increased demands on veteran health care, and the potential need for a fully functional Veterans Administration hospital.
- Possibility of increased funding for social services.

- Impacts from air, sea, or river-borne contaminants originating from U.S. military or joint foreign military exercises.
- Ability to manage a health crisis such as a flu pandemic.
- Availability of adequate medical supplies, vaccines, and so forth.
- Capacity of service agencies to handle anticipated increases of substance abuse, child abuse, family violence, small claims, civil and criminal cases, and so forth.

Several commentors expressed concern about the increased exposure of the island's population to military toxins on land, sea, and air, and expressed concern about increased levels of cancer and increased numbers of children born with low birth weight and birth defects.

### **Respect for Local Values and People**

Twenty specific comments concerned respect for local values (including political values), culture, community, and "sensitivity to community sentiments." Commentors wrote that negative impact could be mitigated through an orientation program for incoming military and dependents on local culture and mores that would "promote the spirit of *Ina 'fa' maolek* (caring, sharing, and getting along);" specifically, the Navy should "adopt prevention strategies to educate visitors to cultures, customs, expectations, and opportunities for interaction." One commentor suggested the JGPO arrange tours of local attractions through the Guam Visitors Bureau and Chamber of Commerce for all incoming military and their dependents. Another commentor indicated the EIS must include the promotion of respect for diversity and social integration by providing such education; "the military must consult with local government regarding this issue."

The CMTF Social and Cultural Subcommittee, chaired by Thelma Z. Hechanova, Acting President of the Department of Chamorro Affairs, suggests, among several points, that the EIS assess the DoDEA curriculum to determine whether it adequately educates youth on Guam's history and culture. The subcommittee also suggests assessing the feasibility of COMNAVMAR and Andersen AFB historians educating the public to enable a better understanding of the military in Guam.

One citizen recommended that JGPO and the Navy choose more representatives from the Chamorro community to more appropriately represent local values. One commentor expressed concern that disruption to family lives and cultural values would ultimately "jeopardize the future of [indigenous] children." One commentor expressed concern that the elderly get more respect, suggesting separate meetings for the elderly community. The Micronesian Youth Services Network expressed concern about ensuring that "the transition of personnel on our islands will not disrupt our family lives and our cultural values...."

Several commentors indicated that they felt as though they were treated as second-class citizens. One commentor from Saipan indicated that "these are their islands, and the locals' culture and related artifacts which still can be found...are also deserving of respect."

Other commentors predicted the new population would get along well with the local community and that new residents would choose to live in the local communities. Sanctuary Incorporated, a non-profit organization focused on youth and their families, recommended using the *Social Impact Assessment Guide and Principles* as a basis for conducting the social impact study for the EIS. The Chamorro Studies Association requested, "protect the people of Guam and their human rights."

Several commentors expressed concern about potential increase in racism and discrimination. The CMTF Cultural and Historic Subcommittee recommended that the EIS assess the current interaction between DoDEA and the GPSS to facilitate integrated and collaborative activities in anticipation of promoting anti-racism and gaining a better understanding of cultural differences.

### **Socioeconomics**

Scoping identified a number of socioeconomic areas to be assessed in the EIS. The Bureau of Statistics and Plans, in its recommendations to the CMTF, indicated that the EIS socioeconomic evaluation should address changes in population, community demographics, and employment and income levels; demand for public services; and demand on Guam's utilities, transportation infrastructure, education service, health care and social services, among other major issues. The bureau also indicated the need to conduct the socioeconomic study in the context of the other impact assessment components (i.e., fiscal, environmental, and transportation).

### **Job Opportunities**

Job opportunities resulting from implementing the proposed action generated significant comment. The comment document submitted by the Guam Chamber of Commerce (GCOC) at the scoping meeting in Dededo discussed a 2007 survey conducted by that organization which found that 88 percent of Guam residents polled believe that the increased military presence will result in additional jobs. The ability of local residents to compete for jobs, the potential for priority in the hiring process to be given unfairly to military dependents, the influx of alien workers and their associated impact on the job market, and recommendations that priority be given to local workers were the major themes of commentors. Several commentors indicated that qualified local residents should receive hiring preferences. One requested that all contracting be local and that all civil service posts be filled by local workers; others asked whether the DoD would offer job training, particularly for management and white collar jobs. One commentor from Tinian felt that there would be "jobs for everyone."

Because military dependents qualify under federal displaced worker programs, the CMTF Subcommittee on Labor recommended that the EIS address the impact the inclusion of military dependents would have on federal dollars and training slots otherwise available for Guam residents classified as displaced workers.

Several commentors were particularly concerned about opportunities for and consideration of people with disabilities. DISID stated that individuals with disabilities would be at a disadvantage and in "fierce competition" with non-disabled job applicants, and recommended that the military require its contractors to allow vocational rehabilitation consumers the opportunity to be trained and employed. Other commentors also wanted to know whether financial assistance would be available to develop employment and training for people with disabilities.

One commentor asked that contractors and subcontractors know the laws regarding hiring of people with disabilities, particularly in terms of requirements to purchase products and services from companies who work with the disabled. The Veterans Affairs Office inquired about the ability of disabled veteran-owned businesses to participate in the construction contracts, whether there is a priority for these groups or a percentage being reserved for them, and whether JGPO would notify veterans of such an opportunity through press releases.

Several organizations are hoping to find qualified people among military dependents to help meet anticipated growth in job opportunities. Among them, DISID cites the need for certified social workers, vocational rehabilitation counselors, and compliance officers. The University of Guam School of Nursing, Social Work and Health Services is anticipating more nurses who can work in various health facilities on Guam and the additional and varied expertise they will bring. Also, the school is anticipating availability of military nurses or their spouses as adjunct faculty members and student preceptors. The CMTF Subcommittee on Labor recommends that the EIS, in its assessment of the impact on availability of teachers, assess the potential of military dependents providing services to the civilian school system.

### **Quality of Life (QOL)**

The 2007 GCOC survey referenced previously (cited in the comment document submitted by that organization) showed that 60 percent of Guam residents believe that the added military presence on the island would ultimately improve the island's QOL. Of the remainder, 21 percent disagreed and 19 percent indicated that they didn't know.

Senator Pangelinan indicated that the EIS should include an assessment of the interactive social, political, and economic effects on the people of Guam's QOL and culture. The CMTF Cultural and Historic Resources Subcommittee report indicated that the EIS should address social and cultural issues related to, among other specific areas, improving QOL for the military and their families in Guam and ensuring inclusion of the military and their families in the community to the maximum extent possible.

Other comments on QOL included concerns about:

- Potential for increases in undesirable adult entertainment spots and the increase in "red light" entertainment.
- Increased numbers of confrontations between members of the military and local residents.
- Disruption of/changes in access to recreational areas.
- Loss of Guam's domestic tranquility; and aesthetic impacts to pristine land.

One commentor stated, "The quality of life in Guam and the Mariana Islands cannot be compromised." The director of the Micronesian Area Research Center submitted a paper on QOL issues related to the proposed military expansion on Guam, contending that QOL issues (encompassing everything from dependable infrastructure to environmental and cultural concerns for the citizenry of Guam) "are not a luxury, they are a necessity." He stated further that the Marine presence on Okinawa had degraded the QOL there, and that resolution of these issues depends on a working partnership with the U.S. military.

One commentor from Tinian expressed concern that once the military came to the island, movements by civilians would be restricted and feared that "the dock and airport would be under the sole control of the military".

Some commentors perceive impacts to water recreational resources and facilities as QOL issues. The GEPA mentioned in its comment document the need to estimate numbers of additional active duty personnel, dependents, and transient workers who will be in competition with residents and tourists for sites for diving, snorkeling, sailing, fishing, and boating.

One U.S. Navy commentor indicated QOL concerns that pertain to the military and their dependents. He indicated that the proposed plan to relocate three Marine Expeditionary Force units to Guam would significantly impact current tenant operations, training, and QOL, and commented that the infrastructure planning and programming should aim to minimize and/or mitigate impacts “in a most reasonable manner.” Examples of potential QOL impacts that this commentor presented include:

- Potential inequity in quality of infrastructure between relocated units living in new facilities and existing personnel in old ones.
- Impact of CVN operations on QOL of current missions and QOL of base personnel.
- Potential of the Polaris Point CVN location option to impact QOL of area families and service members.
- Impact to the QOL of the CVN crew because the proposal isolates the crew from naval base mission support and QOL assets (e.g., the exchange, clubs, and other infrastructure).

### **Mental Health and Substance Abuse**

The CMTF Subcommittee on Health and Human Services expressed the concern that changes in community structures and increased migration to and from Guam will increase mental health problems, child abuse, and child neglect on Guam. The subcommittee report indicated a need to assess the military’s plans for mental health and substance abuse treatment and developmental disabilities, and determine what measures are needed to meet the demand for services.

Other commentors also expressed concern about the potential increase of mental health problems (with regard to the military population, the concern is largely PTSD), increases in drug and alcohol abuse due to the increased population, and the ability to handle the anticipated cases with existing resources, including facilities and professional staff. Sanctuary, Inc. indicated the need for training in drug and alcohol addiction counseling and clinical services.

### **Income Levels and Welfare System**

One commentor indicated that the EIS should assess the possible impacts of the proposed project on the need for welfare services. Another expressed concern that as the cost of living rises, more residents would need public assistance programs, increasing the financial burden on the government (of Guam). The CMTF Subcommittee on Public Health and Social Services requested that the EIS examine the extent of impact on family income levels, the potential effect on the welfare system, and resulting disparities.

### **Libraries**

The Guam Library Association commented that the Guam Public Library System is insufficiently robust to serve the anticipated thousands of additional customers. Commentors recommended that libraries be included in plans for the military expansion, stating that they are important in providing “healthy alternatives” in terms of activities for members of the military. One commentor supported “full development of the community support services component” of the *Guam Integrated Military Development Plan*, indicating the entire component as outlined would be needed to support the increased numbers of military and their dependents.

## **Mitigation**

One commentor asked what mitigation DoD would pursue to address impacts on the school system if teachers are drawn away to teach in the DoDEA school system. Others had general questions about how impacts on education would be minimized. In terms potential lack of respect for local values and culture, several commentors suggested educating the incoming military and their dependents on local culture, history, and mores. One person suggested mitigating the impact of the “red light” industry by working with the local Guam authorities to establish a specific zone within which such activities would be allowed to operate.

### **4.3.3 Economics**

The CMTF Economic Development Subcommittee report expressed concern that the extent of benefits and potential impacts on jobs and revenue has not been quantified, and recommends that the EIS forecast the financial impact of the proposed actions on the Guam economy.

## **Labor**

Labor-related comments covered a wide range of interests. The CMTF Economic Development Subcommittee indicated that the EIS should analyze the number and types of jobs to be created and anticipated associated revenue. The Guam Contractors Association (GCA) believes that the military construction program for Guam will necessitate workers from Asia and suggests there be a special quota or waiver to facilitate this. The GCA is concerned about ensuring compliance with federal and local laws to prevent abuses of alien labor force (H2B) workers, such as have occurred in the past.

The CMTF is concerned about local work force sustainability, the potential impact of an H2B on the local and regional community, and the challenges to the economy from the U.S. Congress’s approval to remove the restriction of H2B labor on military-related construction. The task force recommends that the EIS include:

- An assessment and projection of wages by skill sets and other job desirability factors.
- Characterization of the sustained job increase post construction in the military, public and private sectors.
- Training requirements anticipated over the next 15 years for multiple skill sets.
- Analysis of the impact of the DoDEA educational system on availability of teachers and other specialty services and therefore on Guam’s public and private school systems.
- Evaluation of potential workforce availability over the next 10 years.
- Analysis of the impact of military dependents on federal dollars and training slots otherwise available for Guam’s residents.

GCOC indicated that build-up of training facilities in the CNMI to store equipment for training would complement the chamber’s concept of “labor collaboration,” which envisions labor-intensive work such as prefabrication of buildings that would greatly alleviate logistical and congestion issues on Guam, put unused excess barracks in the CNMI to use, and reduce the social impact of thousands of foreign laborers on Guam.

Several commentors are concerned about competition for job openings, and some recommend priority consideration in hiring for Guam residents. Others are concerned that military dependents

will receive priority in jobs. Still others are concerned about the need to address labor pool issues, previously discussed in other subsections, and the potential drain of employees from local businesses and industry, most particularly the tourism industry, by higher-paying jobs related to the military expansion (e.g., construction jobs).

One commentator was specifically concerned about labor and wages as related to women. That individual indicated that the EIS should include baseline data on wages earned by women on Guam and an analysis of the anticipated effect on women's earnings from increased competition for local wages. The commentator indicated further that the EIS should assess the effect on growth in and increased reliance on the low-paying retail sector, especially in terms of women's employment.

The GCA addressed the anticipated training needed for an estimated 20,000 people to accommodate requirements of planned military construction. The association asked for consideration of federal funding for student tuition at the Trades Academy, possibly through a public-private partnership with the Guam Department of Labor.

### **Small Business**

Small business concerns included several issues. The CMTF Economic Development Subcommittee recommends that the EIS recommend mitigation if funding from the Japanese government is non-appropriated, because non-appropriated funds are exempt from small business targets. The subcommittee report also indicates that the EIS should assess the impact on small business participation if nationwide small business goals have already been met in other U.S. locations and the possibility of applying the Alaska Native Corporation model to Guam businesses.

### **Tourism**

The Guam Visitors Bureau observed that tourism exerts the greatest impact on the island's economy; GCOC stated that tourism provides 20,000 jobs, or one-third of the island's employment. Not unexpectedly, tourism and the impact of the proposed action on tourism generated considerable comment. The GEPA and others indicate the EIS should address the impacts of the proposed actions on the Guam and CNMI tourism industry.

Some commentators made general comments about the anticipated impact of the proposed action on tourism; others were more specific. Some commentators felt that tourism would increase because families of military personnel, contractors, and other workers would vacation on Guam. Commentors from Saipan and Tinian also anticipate an increase in tourism. Two commentators were concerned about the impact on tourism of visitors seeing large numbers of military personnel and vehicles – one individual suggested a resultant change in perception from Guam the Paradise to Guam the Military Base. Another individual indicated that the EIS should assess effects of intensified defense dependency on tourism and economic stability.

In its comment document, The Visitors Bureau stated that more North American tourists are anticipated and cited a recent *Japan Intelligence Report*, which indicated that the increased presence of the military has not changed Guam's image as a vacation destination (62 percent of those polled); indeed, 27 percent of people polled said that the increased military presence improves the island's image. The report noted, however, that the expansion will tax the already strained infrastructure (see Section 4.3.6), which, in turn, will exert a negative impact on the ability to sustain tourism, as tourism "absolutely demands clean water, power, and proper disposal of wastes."

The Visitors Bureau, the GCOC, and several individual commentors are very concerned about migration of the tourism labor force to construction and other job opportunities. The GCOC recommends that JGPO be sensitive to “wage-driven competition” and the potential to erode the island’s tourism work force. Finally, there is concern that construction activities and the associated increased traffic and congestion in the port could negatively impact tourism.

One commentor questioned how the military leadership would support tourism, and recommended that the military hire Guam’s skilled labor force, promote use of hotels by military visitors, and assist with the construction of Guam’s National Museum and Guam’s Conference Center.

### **Local Business**

Local businesses would like to participate as much as possible in the anticipated military expansion. Commentors, including the mayor of Piti, wanted to know whether construction materials, supplies, equipment and other goods would be purchased from local businesses to spur economic growth and provide more local jobs. One commentor recommended that all contracting be accomplished by local firms, to include local civil service hires, and expressed concern about alien companies immune to local controls doing business on bases.

CMTF Economic Development Subcommittee recommends assessment of opportunities for local businesses to obtain a larger share of contract dollars than in the past; statistics show that local contractors obtained only 45 percent of funds awarded even though they won 71 percent of the total contracts.

Local businesses (regardless of size) expressed concern that the military and its contractors can ignore local franchises that supply certain goods and services and deal instead with off-island franchises of the same company, because Guam is designated an “overseas” area. The CMTF recommends that the EIS evaluate this designation with the goal of ensuring that local franchises are respected in contracting. Further, the CMTF recommends that the EIS should evaluate subsidies provided to off-island suppliers of goods to the disadvantage of local businesses. At least one commentor recommended making local purchasing a priority. The CMTF also recommends evaluation of the impact of off-island construction project contractors on local businesses, particularly small, disadvantaged, and minority businesses. In another comment, the CMTF indicated that the EIS should evaluate the impact of the proposed action on the ship repair industry, to include a comparison of current ship repair facilities against anticipated future needs.

One commentor cited the policy in effect under the former Navy Public Works Center, where individual divisions issued operational contracts for technical assistance with local vendors, resulting in maintenance of a staff of skilled professionals at all times and empowering the community to build capacity. The commentor contrasted this with the anticipated use of off-island contractors.

### **Competitive Prices and Purchasing Issues**

Commentors expressed concern for more competitive prices both on and off base. As cited previously, one commentor inquired whether civilians could get onto bases to see what products are offered at what prices in order to compare them with off-base pricing. According to the CMTF Economic Development Subcommittee, the EIS should project how much spending will occur both on and off base by industrial category to enable market analysis for business expansion and introduction of new businesses.

## Housing

Housing and the housing market and the impact on that market (rental and home purchase) of the arriving military and their dependents are specific areas of concern. While the “boost to the rental and housing markets in Guam” is seen as a positive impact, commentors want the EIS to assess and mitigate impact to the rental and home sale market in terms of what commentors say is the already evident impact to middle and lower income families of the anticipated buildup: one commentor contends that because speculators are investing in homes geared toward the military, housing has become unaffordable for the general populace; another calls the housing market one that “already marginalizes the community.”

Several commentors expressed concern that because the military housing allowance exceeds the amount locals can afford to pay, rents will go up, and local residents will be forced out of the market. Senator Guthertz suggested that Guam not be considered “overseas” for housing allowance. Several commentors recommended giving priority to local families in housing (and other areas) to avoid their displacement in favor of military families. One commentor indicated that the Navy should provide a subsidized housing purchase program of cash grants to mitigate the impact of the anticipated influx of Marines and dependents. One commentor asked whether the DoD would provide funding for a detailed housing study on Guam, or whether grants would be made available for an extensive study.

The CMTF scoping comments pertaining to off-base housing, housing demand, and rent costs asserts that housing production is not expected to match future demand and that Guam will experience a shortage in total housing and in affordable units. The CMTF *Housing Subcommittee Report* cites the need for information about the anticipated housing mix and expressed concern about the ability of working class citizens to continue to afford to live near employment centers on the island. The report expressed concern about available housing inventory elsewhere, and affordable transportation to work for people who may have to relocate. In addition, the report expressed concern about increased strain the anticipated population growth would have on the existing inventory of emergency and transitional housing. The report recommended assessing the need for more affordable housing, because most housing developments on Guam are now geared to the upper- and middle-income ranges. The report also expressed the need for controlled expansion to avoid excess housing once the temporary support personnel and contract workers have gone.

Comments from the U.S. Department of Agriculture in the Combined Joint Task Force *Housing Subcommittee Report* cited the concern that population growth in some areas of Guam might disqualify rural communities and individuals from population-based housing loans and funding subsidies. The GEPA mentions the anticipated impacts on its resources caused by the need to provide housing facilities for temporary workers.

The GEPA says the EIS should estimate the numbers of H2B workers, temporary alien employees, and workers from the U.S. and elsewhere and assess the long-term impacts of their presence on current and projected home renters.

## Improved Economy

Twenty-three comments centered on the potential for, anticipation of, and ensuring that the military expansion results in an improved economy. In addition to comments relative to anticipated increased revenue generated by the increase in permanent population and the influx of contractors, alien

workers, and their families, the Guam Visitors Bureau and several individual commentors cite anticipated increase in tourism as a contributing factor to improved economy.

GCOC's 2007 survey revealed that 79 percent of Guam residents believe that the increased military presence will lead to additional tax revenue, and numerous comments received during the scoping process concerned potential tax revenues and revenue from various permitting and licensing fees. Several commentors look for cooperation from the federal government in aggressively pursuing all such licenses and taxes, including stopping "leakages" of gross receipt and withholding taxes for work done on Guam. Senator Guthertz proposed that the Government of Guam (GovGuam) levy a nonrefundable processing fee of \$1,000 on each alien worker brought into Guam, to be paid by the employer.

Guam's Department of Revenue and Taxation (DRT) indicated that some companies had not been filing and/or paying taxes due to Guam. DRT requests access to contractors' information from the DoD, and recommends some means by which it could clear companies for work. DRT proposes an awareness program for off-island businesses and contractors to ensure that all filing and payment requirements are met. Commentors also indicated that holders of military contracts must understand all tax laws and requirements, and the CMTF recommends that military contracts be registered with the Government of Guam upon contract award.

Several commentors discussed the need to capture all Section 30 funds, and recommended that these funds apply to transients, even those spending only one day on Guam. The CMTF suggested that the EIS project the cost of living on Guam during construction and operation associated with the proposed action, the number and types of jobs to be created, and the projected revenues payable to the Government of Guam.

The majority of the commentors from Tinian believe strongly that military presence on Tinian would help the island's and CNMI's economy. Six commentors expressed disappointment that the military presence proposed by negotiations 30 years ago, whereby Tinian "gave up 2/3 of Tinian," never materialized. One commentor indicated that the people of Tinian are "on the verge of packing their bags and mov[ing] elsewhere if the economy does not improve." Another indicated that if the military comes now, it would be "worth the wait," but, if not, "the civilians will turn on their support, as the sacrifice was not worth the reward."

### **Mitigation**

The CMTF Subcommittee on Labor requested that the EIS identify measures to mitigation the impact military dependents would have on the federal displaced worker programs in Guam. One comment recommended that the EIS assess mitigation of project-related increases in demand on the welfare system.

The Bureau of Statistics and Plans says the EIS needs to identify the means to mitigate adverse socioeconomic impacts, including not taking or modifying a proposed action; minimizing impacts through design or operation; or compensating for the impact by providing substitute facilities, resources, or opportunities.

The president of the Guam Hotel and Restaurant Association recommended developing programs to augment the existing local work force pool in the face of potential drain by the increase in federal civil jobs.

#### 4.3.4 Chamorro Interests

Discussion about access to ancestral land can be found in subsection 4.3.4, and discussion pertaining to respect for local values and people can be found 4.3.2, including reference to the possibilities of educational programs for incoming military and their dependents.

The CMTF Social and Cultural Subcommittee submitted a comprehensive paper on the subject of Chamorro interests (see Appendix G). That subcommittee recommends that the EIS identify issues and concerns that must be addressed to minimize negative social impacts and allow local and military communities to live in harmony. On this subject, the report recommended that the EIS assess:

- Guam's current infrastructure in terms of family entertainment, art, music, and cultural activities and identify methods to overcome shortcomings.
- Guam's plans for the Guam museum and the potential for shared funding.
- Feasibility of a partnership among the military, GovGuam, consulates, and tourism entities to develop a cultural reception center for newcomers that promotes Guam's culture and resources.
- Available resources to ease the transition of military personnel and family members moving into and living in the local economy (i.e., outside the fence).
- Current cooperation between military and local communities and identify ways to improve integration, including involvement of arts and culture groups.
- Use of local artists during military-related functions to foster and promote Guam's culture.

#### Self-Government

Senator Guthertz and other commentators inquired about the impact of the proposed action on progress toward self-government for the Chamorro and called for the EIS to analyze the effect of the proposed action on decolonization as a non-self-governing territory. Some commentators expressed concern that the proposed action would have a negative impact on the quest for self-government. Catherine Flores McCollum, the Maga Haga of the Colonized Chamoru Coalition (CCC), commented "our self-determination is at jeopardy again. We do not want interference. It is our right to choose our political status. We want to be decolonized." Ms. Hope Cristobal of the Chamorro Studies Association cited United Nations Resolution 1514(XV), which affirms the right of all peoples to self-determination, and indicated that the Chamorro people are inextricably part of the homeland: "we are the taotao tano'." Ms. Cristobal said that the proposed action presents obstacles to decolonization of the Chamorro people and political status development, and contravenes the process of mutual consent by the people of Guam to any major decision affecting them.

One commentator wrote that the U.S. government should help Guam exercise its self-determination and help Guam towards "a true democracy." Another referred to the current situation on Guam as enslavement, colonial domination, and oppression of individuals and indicated that the United States is obligated to support Chamorro self-determination. Another commented that the relocation of U.S. Marine Forces should not be implemented until the people of Guam (i.e., descendants of Chamorro inhabitants in 1898) are educated about their political status options and the island's people vote in an internationally monitored plebiscite to determine their political status.

The CMTF Subcommittee on Health and Social Services report contended that the military buildup, with the decision-making powers in Washington, would strengthen the sense of individuals and groups in Guam as a colonized people.

One individual stated that the military build-up “violates the human right of self-determination of the Chamorro people by the way decisions were made,” and feels the build-up will eventually weaken, demolish, and destroy those rights. Another commentator indicated that Guam has the right to say “no” to the military buildup proposal because the U.S. has not kept its word regarding guiding Guam to independence and has abused laws requiring American managerial administration not to last beyond 25 years.

### **Cultural, Historic, and Architectural**

Comments pertained to the need to preserve traditions, language, culture, and sacred grounds for future generations. The CMTF Subcommittee on Health and Social Services wants more emphasis on preservation and Chamorro language and culture. The subcommittee’s report also expressed concern about the disintegration and weakening of familial and kinship networks.

Recommendations from commentators on the EIS process include assessment of the economic value of cultural resources of Guam, assessment of land-taking policies, and working with local regulatory agencies towards protection of ancient Chamorro burial grounds and other such sites. Concerns were expressed that the influx of off-island construction workers, many of whom may become permanent residents, will have an effect on the ability to preserve the Chamorro culture.

In terms of historic and archaeological sites, the GEPA indicated that all proposed new development sites must receive formal historic site impact review, evaluation, and mitigation for impact in these areas. One individual requested that the military record and preserve historic information before building, demolishing, or bombing. The Bureau of Statistics and Plans wanted to know whether the potential archaeological sensitivity of the total project area would be assessed, whether archaeological assessments of sites would be conducted, and how well the members of the military would be educated in the importance of this need. The Advisory Council on Historic Preservation announced that it will participate in the consultation to resolve adverse effects for the proposed military expansion in the CNMI.

Commentors stated that heritage landscapes on Guam are essential to tourism; heritage tourism is an important component of the tourist market on Guam; continued access to these locations must be assured. Heritage institutions such as the Guam Museum and Micronesian Area Research Center at the University of Guam are critical, contribute to the heritage tourism market, “and should be subsidized in the current military build-up.”

### **Demographics**

Commentors expressed numerous general concerns about the overall impact of the anticipated increase in population on Guam’s demographics. Several specific comments concerned the political impact brought about by potential skewing effects of population changes on both island-wide and district elections. The CMTF Subcommittee on Health and Social Services and others expressed concerns about “minoritization” of the Chamorro people in their own land.

#### **4.3.5 Law Enforcement**

Senator Guthertz and other commentors asked for on- and off-base crime statistics for the Marines stationed on Okinawa. The CMTF writes in its comments on public safety and law enforcement that the EIS should assess the impact of the increased population generated by the military buildup on Guam's law enforcement resources, including the potential impact on Guam's criminal justice and prison systems. To do this, historical data from Okinawa and other neighboring areas related to the military and local arrests is required.

#### **Crime and Prostitution, Violence Against Women and Children**

Thirty-three comments expressed concern about the potential for increased crime and prostitution. One commentor indicated anticipated higher rates of domestic violence, rape, and sexual assault due to increased military population, and higher rates of property crime with increased poverty and drug abuse.

Five comments were received concerning violence against women and children. Commentors referenced violent incidents involving Marines on Okinawa and expressed concern about similar incidents happening on Guam. The CCC Maga Haga said, "Many of our women will be exploited and impregnated by the influx of military personnel" and asked whether the military will take responsibility for the illegitimate children "born from this abuse."

Other specific concerns included the possibility of an increase in sexually transmitted diseases and under-age pregnancies; the probability of public brawling; development of a "red light" industry on Guam; fighting between military personnel and local citizens; and proliferation of adult entertainment and sex shops "detrimental to local culture, family values, and behavior." The Guam Police Department stated that it anticipates additional incidents of drunken driving, vehicular accidents, property crime, and robbery.

Several commentors recommended that the EIS assess establishing a permanent military shore patrol/military police to assist with law enforcement. One commentor recommended implementing a "safe ticket home" program whereby after 2:00 a.m. any serviceman or servicewoman could get a free taxi ride to the base front gate by showing his/her military identification.

The Customs and Quarantine Agency reported to the CMTF its concerns about increases in drug trafficking and human trafficking, already on the rise in Guam, and the increased vigilance that will be required associated with port activities. The agency expressed concern about increased criminal activity associated with the military build-up, citing specifically money laundering, narcotics, and counterfeiting: "Criminals follow sources of money...."

A commentor from Saipan indicated that the island would need assistance with law enforcement because their police force is small.

#### **Police, Law Enforcement, and Emergency Response Resources**

The police department, fire department, emergency services, the Department of Public Health and Social Services, and other agencies expressed concern about their ability to handle additional needs in their respective areas of concern. The police reported that their resources (i.e., facilities, communication, staff, and equipment) are already stretched to the limit and that funds from the Government of Guam are either unavailable or inadequate.

Some of these agencies and departments report that they have lost personnel to better opportunities in the job market. The police department wrote that the shortage of patrol officers and patrol vehicles “has transformed our patrol operations into reactionary mode.” Comments stated that communication is inadequate and computer technology is obsolete. One commentor wrote that only officers who can afford to buy their own ammunition are able to transition from 9 mm caliber weapons to semi-automatic .40 caliber pistols.

The Guam Fire Department anticipates that the proposed military population growth will place greater demands on fire engine programs (fire and emergency responses, fire hydrant maintenance, home safety inspections, drills, and so forth); ambulance service and rescue service; fire prevention programs; emergency 911 communication system programs; and training programs. The department cites the need for additional personnel to meet anticipated growth in demand for emergency response; additional fire trucks, ambulances, and medical supplies; and additional fire and rescue stations.

#### **4.3.6 Infrastructure/Transportation, Miscellaneous Comments**

One commentor indicated that “any increase in the population of Guam means there must be a significant improvement in all areas of our infrastructure.” The Guam Visitors Bureau says, “Tourism absolutely demands clean water, power, and proper disposal of all waste,” and recommends a comprehensive solution along the lines of a public–private partnership, whereby “the government is the landlord but private capital solves the problem and is responsible for the system at least until the capital is recovered.” Several commentors indicated that efficiencies could be achieved by the military’s improving and building on existing infrastructure rather than starting with new systems. A few commentors indicated that the federal government has an obligation to help the people of Guam upgrade all utilities.

GCOC believes that the magnitude of the impact of the proposed action on the island’s civilian infrastructure will require significant external assistance, potentially in the form of help centers on institutional expertise, a comprehensive funding strategy to support integrated upgrading of Guam’s entire infrastructure, and housing and community support facilities. GCOC recommends brokered private sector participation in an island-wide infrastructure by “leveraging the military’s investments...with private capital and federal funds to which the island is entitled that can either support commercial viability of upgrades...or maximize federal and non-local funding sources for highways, bridges, telecommunications, and various social programs affected by the buildup....”

More than two dozen comments pertained to miscellaneous transportation issues, i.e., issues not related specifically to roads. Concerns were expressed about the impact of overall transportation requirements of the magnitude anticipated on an island the size of Guam. The CMTF Subcommittee on Infrastructure and the Ports and Customs weighed in heavily with reports covering various transportation-related issues.

Concerns were expressed about congestion at the port of Guam. The Port Authority of Guam has concerns about the increase in cargo and personnel associated with the infrastructure buildup, which will have an impact on the capacity and operation of the island’s air and sea ports, followed by actual relocation of the military, their dependents, and their equipment and associated increase in the existing flow of passenger vehicles and cargo (household and commissary items, etc.). The Guam Port Authority recommends that the EIS address short- and long-term port requirements; impacts of the CVN berthing on civilian and recreational operations and movement in the harbor; impacts on harbor traffic; and impacts on current tug and pilot service, and coordinate the EIS effort with the

update to the Port Authority of Guam's master plan currently underway. The GEPA would like the EIS to address potential conflicts of use of shared facilities at the port or interference by military demands on critical commercial needs.

Addressing issues of fuel, the Guam Power Authority (GPA) requests load demand and energy requirements for the transfer and buildup period, in addition to the need to determine the fuel reserve requirements. The Department of the Navy (DON)/DoD expects GPA to maintain in order to determine whether the fuel reserve policies are sufficient for DON/DoD mission requirements, and DON/DoD funding required for additional fuel inventory, construction of additional tanks, and expediting existing equipment modifications/upgrades for additional infrastructure to support new fuel types and increased reserves. GPA recommends investigating the benefit of DON/DoD participation in the agency's fuel oil hedging program. GPA wants the feasibility of additional berthing or pipelines for increased security and hedging against system unavailability to be investigated. Finally, GPA wants the DON/DoD to ensure that the local community is not impacted if GPA is unable to complete the required infrastructure improvement by the anticipated relocation.

The Guam International Airport Authority (GIAA) would like the EIS to assess compatibility of the airport's existing and planned infrastructure with current and planned military aircraft operations; the impact on current and planned airport projects; impact on additional infrastructure requirements of airfield, cargo facility, terminal, among others, because GIAA's capital improvement program is based on current project needs. Future military expansion could constrain the expansion of the GIAA. Other issues identified by GIAA include the types of cargo and equipment to be shipped/transported and the transport of weapons and explosives on island roads.

The Guam Public Transit System currently operates with 15 buses. The increase in population is expected to increase demand on the public transportation system. The GEPA says the EIS should evaluate options to develop private shared systems of mass transit that meet the needs of residents and visitors and DoD, should consider potential impacts to alternatives to buses, and should assess the possibility of consolidation or integration of the Guam Public Transit System with military resources (buses and facilities). The CMTF indicated that the EIS should address the impacts of the military expansion on the island's transportation services for students. One issue raised by commentors is that the EIS should also address the transportation needs of the anticipated 20,000 temporary workers who will be housed somewhere on the island during the construction process.

#### **4.3.7 Increase in Traffic/Roads/Highways**

Many of the 33 comments in this category expressed concern about the ability of Guam's roads and bridges to handle the anticipated increase in traffic load. Multiple comments indicated that detailed studies must be conducted identify needs, synchronize signals, and bring roads up to federal standards. Commentors expressed the opinion that infrastructure improvements should be a joint effort of the military and Guam, benefiting the entire island. Some expressed concern that all improvements would be geared to the military only – "behind the fence." One commentor indicated that, "New roads and highways built to support the military missions should be open for use by all. There should be no 'military roads' in Guam except within the bases."

Commentors opined on the pros and cons of building a north-south limited access road. One commentor stated that for this road, the EIS should include plans for condemnation of lands, fair market value compensation to private land owners, public access to the roads, and increased potential for other land takings.

Felixberto Dungca, Jr., land use and transportation planner for GovGuam, observed that DoD facilities are spread throughout the island, and predicted increased traffic and congestion among these locations and between the military locations and civilian/private/government locations on the island. He suggested that if the DoD has a bus system in Okinawa, consideration be given to moving those buses to Guam to augment the existing transportation system. Further, Mr. Dungca recommended developing a comprehensive transportation model to address all infrastructure needs, public transit, accommodation of military personnel, and so forth, to include identification of funding sources and a project plan.

Mary Torre, president of the Guam Hotel and Restaurant Association, requested that funds be identified for signage – roads, landmarks, parks and recreation, and hazard and warning – to add practicality, functionality, and aesthetics for the benefit of visitors and citizens alike.

The Bureau of Statistics and Plans asked whether a transportation study would be performed to support the EIS and posed numerous questions about the impact of increases in population on the transportation infrastructure, the capacity of the existing system, and potential coordination of planning with the Guam highway master plans. The bureau also asked whether the EIS would address “accidents with low probability but high consequences,” and include a separate consequence analysis for maximum severe transportation accidents involving the various heavy trucks anticipated and materials they are transporting. The bureau recommended that the EIS develop complete, detailed hypothetical accident scenarios, and that the analysis include the potential economic impacts of transportation accidents. The bureau was also concerned that planning of new roads take into account increased stormwater runoff, impact to wetlands, and increased noise pollution.

The CMTF would like the EIS to address the impacts of the military expansion on primary, secondary, and tertiary roadway systems. One individual commented, “Don’t do highway planning, do good transportation planning.” One commentator indicated that FHWA allocations for Guam should increase to reflect the military impact on the entirety of the transportation system, and transportation planning should aggressively include greenways and open space corridors as well as supplemental funding. Another commentator suggested doing long-term, not short-term, studies. A third commentator hoped the joint military–Guam effort would “bring Guam into the 21st Century” in terms of fixing antiquated infrastructure.

The police and fire departments are concerned that increased vehicular traffic on roads and highways in areas that are already congested will add to the volume of traffic accidents, road rage, and travel delays and impact the mobility of emergency and rescue vehicles. The GEPA requests that the EIS provide detailed information and analysis of alternative roads and associated impacts. Further, the agency expressed concern about the impact of increased traffic and congestion to the Tumon area and commercial establishments.

Other traffic comments concerned assumptions that proposed housing would be constructed in central and northern locations, thus severely impacting traffic in already congested areas. Some commentators expressed concern that increased traffic would increase air pollution.

### **Mitigation**

In terms of traffic, commentators requested identification of measures to mitigate impacts of increased traffic.

#### 4.3.8 Utility Requirements

Comments on utility requirements in general expressed concern that the utility infrastructure on Guam inadequately serves the existing population and would be unable to accommodate additional demand: “The current production of our utility agencies is barely enough to meet local demands,” according to one commentor. Several commentors told of intermittent loss of power and water supply. Comments also recommended that utility planning and improvement be a joint military-civilian effort, and that improvements benefit the entire island.

GPA’s report to the CMTF identified issues related to power. Several were concerned that planning scenarios might include separation of DoD power from Guam’s island-wide power system. In connection with this possibility, GPA wants to determine the rate impact of such an action and the impact of stranded assets recovery on the civilian community and to investigate federal laws that prevent adverse affects or impact.

GPA also recommended investigating the DON/DoD position on, and requirements for, under-frequency load shedding, to include funding to mitigate the requirement, and investigating the reliability and quality of GPA’s electric service (i.e., outage frequency and duration, equipment obsolescence, system upgrades, funding sources for upgrades/modernization, and rate impact). GPA expressed confidence in its ability to support DoD if construction of power-generating facilities within base parameters becomes an option. One specific concern of GPA is that GPA not be excluded from discussions that may ultimately require GPA support to maintain or operate power utility facilities if a special process entity or core group is formed to handle procurement and contracts to support the relocation.

In terms of overall energy production and capacity, the GPA commented the EIS should:

- Evaluate partnership between the GPA and DoD rather than separate DoD-developed and operated energy systems.
- Evaluate alternative energy options (e.g., wind generation, cold seawater air-conditioning, ocean thermal energy conversion, and solar power, among others).
- Assess designing military facilities to maximize energy conservation and modifying existing buildings to promote conservation.
- Assess the potential for and costs and impacts of accelerating the conversion to underground utilities and removal of above-ground utility poles.

Several other commentors also suggested that the EIS consider the alternative sources of energy identified by GPA. One commentor specified the use of photovoltaic panels and solar water heaters. The Guam Soil and Water Conservation District supported Bio Energy and development of ocean technology for energy generation. Senator Pangelinan requested that a certain percentage of new energy generation be environmentally friendly, renewable resources, such as wind and solar energy.

The U.S. Environmental Protection Agency (EPA) recommended that DoD use a life-cycle assessment approach to determine the best choices for energy generation infrastructure development. The document submitted by the agency contains significant discussion on renewable energy, alternative fuels/biodiesel, and energy conservation and efficiency.

## Mitigation

GPA recommended investigating alternative fuels to mitigate rising diesel fuel (petroleum) costs.

### 4.3.9 Potable Water/Groundwater Recharge

**GEPA and EPA.** Comments from the GEPA and the EPA indicate that they will require review for expansion of drinking water systems to service DoD facilities. These agencies indicated that the EIS should assess existing capacities, projected needs, and approaches to meet those needs; identify alternative sources of water (i.e., surface water, groundwater, recycled water, desalination, and various treatments that would be needed for these sources); and assess the level and impact of increased demand on the sole source aquifer. Several other commentors agreed on the issue of consideration of alternative drinking water sources, citing existing shortages of potable water. The DoD should partner with the GWA on comprehensive water facility upgrades. The GEPA also cited the need to assess accelerated replacement of leaking water lines and development of new storage reservoirs as alternatives to finding new water sources.

In addition, the EPA indicated that the EIS should:

- Describe existing source water quality in the area with respect to public health requirements, drinking water regulations, and applicable water quality standards.
- Estimate the project's drinking water needs.
- Discuss the risk of saltwater intrusion from additional withdrawals from the sole source aquifer.
- Include maximum water conservation in planning for drinking water systems.
- Evaluate water reuse where applicable.

GWA's Water Resources Master Plan (WRMP) forecasts population growth linearly based on historical data; GWA is concerned that the military buildup could nullify projections and associated project schedules.

The GWA, in its report to CMTF, indicated that the EIS should assess impacts on water and wastewater infrastructures, and recommended direct coordination between the EIS consultant and GWA and evaluation of the following factors:

- GWA's WRMP population forecasts.
- Impact and magnitude of capital project cost increases.
- Impact on availability of technical professionals.
- Impact on the cost of utility service to GWA customers.
- Options for leak repair as an alternative to new source development.
- Strategic coordination and integration of distribution systems.
- Strategic extension of the GWA system as an Andersen AFB backup.
- Extension/expansion of the GWA distribution system to support North and South Finegayan.
- Coordinated response to groundwater under direct influence.

The report contains details about each factor and can be found in its entirety in Appendix G.

Senator Pangelinan requested that the EIS provide for construction of a desalination plant to meet the mission requirement of the military.

Another commentor summarized many of the other individual comments in urging the DoD to “consider the water issue in the broadest context possible, including, without limitation, water quantity, water sources, water delivery, and water contamination.” The commentor cited the fact that Guam’s water issues have been studied for years, and provided internet links with supporting information. The commentor indicated that the demand for water “in a closed system like Guam’s affects the entire island in ways we likely have no clear comprehension [of],” and calls Guam’s existing water infrastructure “rickety at best,” and included several quotes from *Stars and Stripes*, 21 July 2006:

“...antiquated utility system needing repairs and restructuring to better meet the needs of its [then] 39,000 water customers, 21,000 sewage system customers, and 46,000 power customers.... Yet there is one customer among those thousands, local officials say, whose size, demand and wealth could help spur some of the improvements: the U.S. Department of Defense.”

“But as 8,000 Marines and more than \$10 billion of military investment make their way to the island...local utility officials see an opportunity to expand their system, enlarge their customer base and share some of the costs to do both.”

Comments indicated that the EIS should assess the need for and impact of increased pumping from the sole source aquifer for DoD uses, the estimated quantity and quality of storm water runoff to be generated by increased impervious surface, how contaminants would be removed, how the runoff would be directed to recharge the aquifer, and groundwater under the direct influence of surface water. The CMTF indicated that the EIS should assess impact on the aquifer due to growth in areas with no public sewer system.

Commentors wanted specifics on the total volume of local water supply, expressed concern that supply could be accidentally or intentionally contaminated, and asked what could be done to prevent such an incident. The Bureau of Statistics and Plans asked what measures would be implemented to prevent possible deterioration of water quality in and around the proposed mission area.

Additional commentors from Guam expressed concern that there would not be enough water for the existing demand and the anticipated increase in population, cited instances when the Navy turned off residential water supplies to some areas, expressed the fear that the military and their dependents would receive priority access to good drinking water, and worried about the ability of the sole source aquifer to recharge sufficiently. One commentor expressed concern about putting a landfill over Guam’s southern water reserve. Another commentor expressed concern that the Navy would cut off the water supply to the people to use the water for their personnel and ships.

Two commentors from Saipan detailed the lack of a potable water supply on the island, the condition of the existing water, the risk of third world diseases from the water supply, and asked for assistance in addressing the problem.

The Guam Soil and Water Conservation District expressed concern about the capacity of the island’s water resources to meet Guam’s agricultural needs. The island’s farming community

requires a consistent and accessible supply of water, and the district is concerned about the accessibility and supply volume of water currently available in both northern and southern Guam. Assessment of the available volume of water, management of the aquifer, and distribution of water resources is critical to the farmers. To ensure compatible development, the agency indicated that the DoD needs to address distribution, infrastructure, source management, and accessibility to water.

#### **4.3.10 Solid Waste/Recycling**

Comments favored a joint Government of Guam–military effort for solid waste management. One commentator suggested specific opportunities for partnering with the local government or sharing resources to handle materials such as waste glass and plastic, indicating that the local communities do not have and cannot afford equipment to process these materials on their own. This same commentator requested that the military show leadership in minimization of solid waste, and gave as an example requiring a charge for each plastic bag used at the commissary or post exchange to encourage people to use their own bags.

A commentator asked whether the DoD would assist Guam with closure of Orote landfill; the commentator speculated that the landfill contains post-war toxic waste placed there before Guam took it over. Another commentator expressed concern that the military would keep everything behind its fence except its solid waste and wastewater.

One individual recommended that the economy could be boosted by a recycling operation that provided business opportunities for local citizens and military families while benefiting the environment. Another indicated that it is important for the military on base and in military housing to have an aggressive recycling program, and suggested such a program could be in conjunction with GovGuam's recycling program. The same commentator indicated that a proposal for an incinerator should not be entertained, as incineration is outdated technology that produces toxic byproducts and greenhouse gases and contributes to global warming.

According to the GEPA, the EIS should address improved new methods to reduce and recycle solid waste (i.e., the Air Force's successful reduction and diversion of waste from landfills), assess impacts of not recycling, assess the possibility of partnerships between private and GovGuam recyclers, assess the option of a single landfill, and assess the change in the projected landfill life as a result of the military build-up.

The Guam Soil and Water Conservation District recommends that the military consider recycling of wastewater for use as a source of water for irrigation. It is their opinion that the construction of new wastewater plants would expand the current practice of discharging treated wastewater to the ocean, thus further depleting reusable water resources. The district recommends an integrated approach to development and management of water and wastewater resources that will mutually benefit the military and civilian populations. Other commentators felt the same.

The Bureau of Statistics and Plans raised the question of the effects of the proposed action on solid waste disposal, among other issues, as it may impact the quality of Guam's waters, particularly in estuarine, reef, and aquifer areas. The EPA says the EIS should identify how solid waste from the project will be managed, and recommends the DoD use a life-cycle assessment approach for determining the best choices for waste management.

#### **4.3.11 Sanitary Sewer Systems**

More than two dozen comments concerned the sanitary sewer system. The GEPA states that:

- Wastewater collection and disposal systems must comply with GEPA wastewater regulations.
- Connection to the public sewer system for wastewater management in connection with the military expansion is necessary.
- DoD partnership with the GWA should be part of the DoD expansion.
- The EIS must evaluate alternatives that best serve both the civilian and military communities.
- The EIS should address the possibility that a comprehensive wastewater collection system for new or expanded DoD facilities in northern Guam cannot be completed in time.
- Alternative solutions to treating and disposing of the increase in wastewater from planned DoD developments need to be addressed.
- Extension of sewer facilities to areas without sewers should be coordinated with the GWA.

The EPA recommends that the EIS identify all expected wastewater disposal needs, identify existing and planned treatment facilities to accommodate these flows, and discuss how DoD existing and proposed wastewater facilities will integrate with GWA facilities. The EPA also stated that the GWA Northern District Wastewater Treatment Plant (WWTP) is out of compliance with its National Pollutant Discharge Elimination System (NPDES) permit and that it is unlikely that a Clean Water Act Section 301(h) waiver from secondary treatment can continue for either that plant or the Agana WWTP if there are large increases in wastewater flows. Project planning should include plans for full secondary treatment and avoid any type of onsite wastewater treatment and disposal system.

Some commentors wanted to know whether the DoD would provide its own sewage treatment plant and sewer lines. One commentor wanted to know whether there will be any mitigation for additional sewage generation from the added population. Another worried that sewers would back up and compromise water quality.

### **Mitigation**

The GEPA says that if GWA improvements can be supported in the form of mitigation of the DoD impacts, the necessity and cost of secondary wastewater treatment may be avoided.

#### **4.3.12 Noise**

##### **Air Space Management**

Numerous comments concerned the anticipated increase in noise from fixed-wing aircraft and helicopters. Commentors questioned whether the proposed increased air activity would occur over land or sea. The mayor and vice mayor of Barrigada expressed specific concern about the impact of the proposed relocation of Marines and of the construction, operations, and maintenance of the U.S. Army BMD task force on air space management.

The GIAA's environmental programs are based on current commercial aircraft activity and assume minimal military traffic. The levels of activity and types of aircraft to be deployed in connection with the proposed military expansion may affect the noise contours approved by the Federal Aviation Administration in 2004 as part of the authority's existing noise compatibility program.

## **Training**

One commentor is concerned about increased noise pollution from military land vehicles as well as military aircraft. A commentor from the village of Mangilao cited annoyance by helicopter noise. Questions came in about what can be done to minimize air activity noise on the island. One commentor from Tinian expressed concern about noise-induced stress.

GEPA indicated that the EIS must consider impacts from proposed firearms training on normal activities of native species and human uses of land and water.

## **Mitigation**

One commentor at the Dededo meeting suggested moving flight operations from the old South Andy housing area to the Northwest Field, and the commentor from Mangilao, requested moving helo training to over the Northwest Field. One commentor suggested that noise abatement projects/programs be initiated to protect communities near bases from increased noise pollution. Another asked whether there would be funding to insulate houses from noise.

### **4.3.13 Land Use Planning**

Many commentors are concerned about land use planning. Issues center on the possibility that the DoD might take more land for the military expansion, the impact of military activities on pristine land, the desire for the military to avoid sensitive areas in placing its activities, annoyance that there is land that has not been released as agreed, and requests not to stop the return of lands, the potential for negative impact on civilian use of land for recreation and development, and the need to train and conduct exercises without hindrance to residents. Tinian residents expressed dissatisfaction that the Navy held two-thirds of the island for 30 years without using it, causing negative economic impact on Tinian.

The Bureau of Statistics and Plans cites the urban development policy of the Guam Coastal Management Program that commercial, multi-family, industrial, and resort hotel zone uses and uses requiring high levels of support facilities be concentrated within areas capable of supporting concentrated land development. The bureau wants to know how the DoD mission would be affected by that policy, and whether historic preservation regulations would be adhered to if the mission requires encroachment onto undeveloped properties. Further, future communities need to be planned and zoned so that business, industrial, and military exercise areas are not in close proximity to housing developments, which would adversely affect both safety and QOL. Also, the bureau indicated that the effect of new activities on the natural landscape of the island must be addressed. The bureau supports green building, conserving site resources, and conserving energy and materials, and its report makes suggestions in terms of house design considerations to ensure incorporation of green design in planning.

The GCOC believes that the potential socioeconomic and environmental impact of the proposed action can be “reduced, mitigated, or otherwise muted to the extent that various elements of the planned build-up occupy ‘customized’ land use footprints” throughout Guam and the Marianas, citing as examples large post-Base Realignment and Closure of land and underutilized facilities remaining on U.S. government property.

One commentor indicated that he believed that Guam land issues do more to strain local–federal relations than any other issue. He believes the military expansion can occur without provoking local

sensitivity if existing public rights-of-way remain open, new roads are available for military and civilian alike, and excess federal land (“Andy South” and “South Finn”) is released as promised.

Some commentors offered specifics: opposition to live fire near Yigo, for example, and concern about the impact of maneuvers near Dededo. Several individual commentors agreed with the GCOC that the military should use land already under federal control, feeling that the expansion can be accomplished within the military’s current footprint. One commentor requested coordination of any future land use planning with the Government of Guam – “it can no longer be haphazard.” Another wrote that in 1976, 20,000 acres on Tinian were acquired by lease for 99 years, intended to house a \$600 million multipurpose base under Air Force administration, and asked what happened to that plan.

The mayor and vice mayor of Barrigada expressed concern about impacts of about the impact of construction, operations, and maintenance of the U.S. Army BMD task force on future zoning, development, and land use of privately owned vacant properties on Route 8a.

Another issue raised by commentors related to land use planning is the question of where the estimated 20,000 additional laborers needed for the construction effort will be housed. Guam does not at this time have additional land zoned for barracks.

Several commentors offered property for use by the government to accommodate the Marine relocation. These offers were for parcels ranging from several acres of undeveloped land to several parcels near existing military facilities. In addition, there was an offer of use of a developed resort area as a residential community.

#### **4.3.14 Marine Resources**

Numerous commentors expressed concern over both direct and indirect impacts of the military expansion on Guam’s marine resources and the marine ecosystem, including potential aesthetic impacts on “beautiful areas” such as Selle Bay, Cetti Bay, and Fua Bay. One commentor indicated concern about the potential impacts on the environment of Apra Harbor from berthing an aircraft carrier there. Comments received from the Division of Fish and Wildlife (DFW), Department of Lands and Natural Resources, CNMI, indicated concern about the possible impacts to marine resources of the CNMI.

The U.S. Fish and Wildlife Service (USFWS) submitted a comment document that discussed endangered species, species of concern, and federal trust species. Federal trust species found in the Mariana Islands include coral reefs and marine mammals, and impacts to these species are therefore a concern for the USFWS.

The Bureau of Statistics and Plans indicated concern about the potential impact of each proposed project related to military expansion on marine resources, including removal or disturbance of marine habitat. Western Pacific Regional Fishery Management indicted that the EIS address impacts to Guam’s coastal and marine resources. The Guam Department of Agriculture indicated that the DON should consult with their representatives regarding marine mammal species, specifically to avoid impact on endangered sea turtles and sea turtle nests.

The National Park Service, U.S. Department of the Interior, discussed potential impacts to sites within the War in the Pacific National Historic Park (NHP) from adjacent development or increased use of the park. Many sites of cultural significance for the Chamorro resident population have

marine-related importance: food was formerly gathered from the reef flat in the Asan Beach unit; the Agat area was used for subsistence fishing; legends are associated with Camel Rock and islets in the Agat unit, and so forth.

The EPA comment in terms of impacts of training covers potential impacts in multiple resource areas: the EIS should identify the proposed training actions and assess the impacts from live-fire training exercises, including the potential for fire, noise impacts to wildlife and coral reefs, soil and water contamination, and safety risks from unexploded ordnance.

### **Fish Habitat, Coral Reefs, and Marine Mammals**

One person fears that accessibility of the shoreline for “high impact” recreational use will greatly damage the ecosystem, impacting fish habitat and survivability. Several commentors were concerned about impacts to the Sasa Bay Marine Reserve. One commentor indicated concern that new construction and bulldozing of the jungles would cause runoff and landslides that could pollute beaches and destroy marine life.

Commentors indicated specific concerns about impact to the coral reefs and the increased potential for sedimentation of the reefs. One commentor indicated that anthropogenic factors are already heavily impacting the coral reefs surrounding Guam, and asked how the military would minimize impacts caused by the new construction, human thoughtlessness, arson, and so forth. This commentor also asked whether there would be educational training for newly arriving military and their dependents about protecting coral reefs.

GEPA expressed concern that amphibious landing exercises would have impacts on coral reef conservation and coastal area erosion. The agency indicated that the EIS should develop alternatives to destroying the coral reef shoals in Apra Harbor in connection with the turning basin for the visiting aircraft carriers, and suggested better markings with proper buoys to protect shallower shoals from ship groundings and other boat damage. GEPA further indicted development of deep water artificial reefs would not mitigate damage to these shoals.

The EPA indicated that the EIS should:

- Discuss the effect of training on erosion and sedimentation stress for coral reefs, identifying mitigation measures in all cases.
- If mid-frequency sonar is part of the project, assess impacts to marine mammals based on the best available science.
- Fully document impacts from dredging and the fill-in connection with the CVN pier/waterfront infrastructure work on coral reefs and other aquatic resources.
- Identify the acreage and ecosystem characteristics of the area directly affected, depth of dredging operations, and length of time required for the dredging.
- Describe the potential for indirect impacts from sediments on coral reefs and identify measures to monitor and mitigate these impacts.
- Include non-structural alternatives and those that avoid and minimize impacts to coral reefs.

One commentor from Saipan also recommended “a major orientation effort” related to local laws, regulations, and protocols for spear-fishing, SCUBA diving, reef-walking, marine and seashore takings, and so forth.

The National Park Service indicated that approximately 1,000 acres of marine environment in the War in the Park NHP (more than half the total park area) could be affected by adjacent development or increases in park use. These acres contain significant marine resources, including extensive coral reef resources and microhabitats and the Agat unit. The Agat unit contains extensive seagrass beds that serve as a nursery habitat for coral reef organisms, provide shelter and habitat for neretic organisms (those that live in the tidal zones), and can influence water quality.

Guam Department of Agriculture indicated that the EIS should address direct and indirect impacts to coral reef and terrestrial resources that would result from the proposed action, specifically those associated with installation or upgrade of facilities to accommodate a vessel the size of a nuclear aircraft carrier. Further, the department recommended that projects related to marine ecosystems avoid periods of coral spawning, and recommended that a habitat equivalency analysis (HEA) or other equivalent model be used to determine appropriate compensatory mitigation for loss of coral reef habitat.

The CNMI DFW expressed concern about potential adverse impact to coral reefs or shallow water habitats to those islands from military exercises involving movement of heavy equipment and personnel.

### **Effects on Local Fishermen and the Fishing Industry**

Several commentors conveyed concern about the impact on local fishermen and the fishing industry; one characterized the impact as “disastrous,” contending that the military influx will exacerbate the already significant impact by non-native user groups on the limited shoreline resource. That commentor indicated that impacts on the marine ecosystem by high-impact recreational use of the shoreline will result in loss of sustenance and protection for marine species, that lack of habitat will impact growth and survivability of fish, and that native fishers who fish for sustenance and livelihood will be forced to abandon their way of life. Other commentors expressed the same concerns.

CMTF comments indicated that impacts on current and potential fisheries must be addressed, including transshipment through Guam and development of proposed new fishery facilities in Apra Harbor. Another commentor also indicated the need for additional fishery facilities in Apra Harbor facilities to support tuna fishing.

The Bureau of Statistics and Plans indicated concern that significant increase in population would increase demand on local fisheries and contribute to the over-harvesting of already over-exploited reef fish populations and populations of other commercially valuable reef organisms.

### **Other**

Commentors indicated concern about the potential impacts of firing into the ocean. GEPA commented that the EIS should address impacts of land and water use of military explosives. Senator Guthertz and at least one other commentor indicated that any live firing ranges for training must not impact waters on the west side of the island, as these diving and fishing areas are important to Guam’s residents and tourists. One commentor expressed concern that the Double Reef area, important to tourism, would be “placed off limits” due to proposed live firing, and suggested moving those exercises to the naval magazine area where the military owns land.

The EPA indicated that the EIS should disclose information on U.S. waters that could be affected by the proposed projects, that discharge into those waters “must be the least environmentally damaging practicable alternative available to achieve the project’s purpose,” and that the EIS should evaluate project alternatives in this context.

The Bureau of Statistics and Plans recommends monitoring of living marine resources prior to, during, and after construction or dredging activities and development of contingency measures to address unexpected or accidental impacts to marine resources. The bureau indicated that monitoring efforts should focus on vitality of living marine resources and not solely on environmental variables (e.g., turbidity, nitrates, phosphates, and so forth).

One commentor expressed concern that local expertise in tropical marine biology be used to avoid repetition of prior incidents of errors in studies by people unfamiliar with local species. Another was concerned about avoiding deterioration of the island’s marine attractions.

### **Mitigation**

EPA indicated that a comprehensive mitigation plan for impacts to coral reefs and biological resources should be developed, and that the EIS should include discussion of minimization and mitigation of impacts to coral reefs in terms of construction practices, HEA, a mitigation plan, responsible parties, and contingency plans. The Guam Department of Agriculture indicated that the Navy must “honor, implement, and fund mitigation measure(s) related to the loss of the coral reefs and terrestrial ecosystems as agreed upon....”

#### **4.3.15 Ecological**

##### **Endangered Species**

Commentors – both individual and agency – evidenced much concern that the EIS assess impacts on endangered species, including potential impacts to essential habitat for those species. The USFWS submitted a detailed comment document, recommending, among other items, that the DoD conduct environmental compliance for each project that is a part of the proposed action, and that consultation and cooperation with the service and other relevant resource agencies begin at the earliest possible time in the analysis process. The USFWS comment document can be found in its entirety in Appendix G.

The USFWS is concerned, as are other commentors, that the activities associated with the military expansion (i.e., construction, expansion, and alteration projects and military training activities) may result in habitat loss and physical disturbance of federally listed endangered species. The USFWS indicated that the DoD must follow appropriate Endangered Species Act Section 7 procedures.

In its comment document, USFWS cites several specific species of concern, which are species with restricted ranges that could be impacted by military activities on some of the islands in the Marianas, and recommends that the EIS include an analysis of potential impacts to those species. Additional species called *federal trust species* occur in the Mariana Islands, among which are migratory birds. The USFWS expressed concern that the aforementioned activities may disturb or harm these species. The EIS must disclose in full all potential impacts.

The GEPA expressed particular concern about native Guam tree snails; three species are listed as endangered on Guam. The agency indicated that these snails have been badly impacted by human activities and have been inadequately addressed in previous impact studies.

## **Invasive Species**

The USFWS, EPA, and six other commentors stated concern over the potential for harm from the introduction of invasive species to fragile ecosystems on Guam and in the Marianas by increased traffic among the islands from the movement of personnel and materials. Such species include the brown tree snake, vertebrate pests that have already caused significant damage, flatworms, various insects, and some plants. The USFWS indicated that one or a few of these would be devastating to each island's unique ecosystem, and that the EIS must outline inspection and sanitary procedures to avoid introducing invasive species to islands that might be free of them. Again, there were multiple comments along this line.

The EPA indicated that the EIS should address the potential for aquatic invasive species to be transported via bilge water, hull fouling of ships using berthing facilities, and increases in shipping traffic associated with the project. The GPA expressed concern that the potential for invasive species, including the brown tree snake, to enter and leave Guam will rise proportionately with the increase in air traffic and movement of personnel and cargo.

With particular reference to the brown tree snake, major concerns from commentors included movement/escape of the snake to other Pacific islands and potential approaches to control and mitigate such movement. The USFWS indicated that existing control and containment activities at air and sea ports are insufficient to deal with the risk associated with the increased cargo and personnel movement from Guam to other vulnerable destinations. Further, the USFWS indicated that the Navy must assure funding to sustain a 100 percent inspection rate of all cargo, vehicles, munitions, household goods, and other items departing from Guam. This level of funding should be part of the Navy's annual operations budget.

The CNMI DFW indicated that the issue "of utmost concern" to the division is brown tree snake interdiction. The agency stated that an effective, enforceable, and fail-proof procedure for inspecting all military cargo, personnel, and equipment entering the CNMI must be instituted.

The Guam Department of Agriculture indicated that the EIS must indicate what funding sources will be provided to address measures to control accidental transport of the brown tree snake outside of Guam and, as did the USFWS, indicated that the DoD must assure consistent funding to sustain 100 percent inspection rate of all cargo, vehicles, munitions, household goods, and other items departing from Guam. The department's comments referenced regulation protocols 505 and 506 that should be incorporated into a brown tree snake control plan to be included as an appendix in the EIS.

## **Native Species**

The GEPA indicated that the EIS must note impacts to both endangered and native species and address protection of their habitats, including improved studies and reevaluation of habitat near DoD development sites.

## **Natural Resources**

The GEPA indicates that the EIS must propose and evaluate natural resource conservation alternatives that may best serve Guam's civilian and military communities through a comprehensive island-wide partnership. The agency indicated that the EIS should address loss of vegetation serving as habitat and food sources for endangered species from new development and DoD-related population increases, including alternatives and impacts to mitigate such impacts.

The EPA specified topics of discussion for streams and wetlands in its submitted comment, including acreage and habitat type water sources for mitigation areas, size and location of mitigation zones, and contingency plans, among others.

The CNMI DFW indicated concerns about ensuring the integrity of the CNMI's natural resources, and indicated the need to address impacts to the CNMI's terrestrial natural resources. The agency cited specific concerns about Farallon De Medinilla, home to nesting seabirds subject to impact by potential increases in bombing; resurgence of feral animals that have been or are being eradicated; and the impact on subsistence fishing of families on Alamagan, Pagan, and Agrihan. The DFW requested the opportunity to assess potential impacts to valuable wildlife habitat on Tinian and Aguihan and to negotiate mitigation measures.

The Bureau of Statistics and Plans said that in assessing ecological needs, "the DoD should aim for healthy natural resources." The bureau indicated concern that development along the shoreline has the potential to require removal of coastal marine and terrestrial habitat, increase fresh-water runoff to nearshore marine habitat through increase in impervious surfaces and removal of vegetation, contribute to contamination of the shallow fresh-water lens occurring along the coast, contribute to shoreline erosion, degrade the aesthetic quality of the coastline, restrict views of the coast, and restrict public access to the shoreline, and asked how the EIS would address this concern.

The Guam Department of Agriculture indicted that the EIS should address all direct and indirect impacts related to terrestrial biological resources, including forest and associated biological communities.

The National Park Service indicted that approximately 1,000 acres of natural resources that include tropical savanna, savanna vegetation recovering from fire, limestone and riverine forests, and coastal and inland wetlands could be affected by development adjacent to the NHP or increased use of the park.

Several individual commentors expressed concern about the impacts of the proposed action on vegetation and wildlife habitat. The mayor and vice mayor of Barrigada expressed concern about the impact of placement of the Army BMD task force on wildlife habitat for deer and other indigenous plant, vegetation, and fauna in Radio Barrigada. Another commentor from Guam indicated concern that live fire training at the NCTS area will drive wildlife away and make life miserable for Yigo residents. A commentor from Saipan indicated that CNMI's northern islands are the commonwealth's "only real assets," and expressed concern that care be taken to preserve them and their habitat.

#### **4.3.16 Air Quality**

Comments expressing concern about the potential impact on air quality were received from individuals and agencies. Comments from individuals centered primarily on concerns that increased traffic would contribute to increased air pollution.

The GEPA indicated that the EIS should assess impacts of increased vehicle and vessel emissions on Guam air quality, and assess the impacts of emissions due to potential increase of demands from existing power suppliers or construction of new power sources, including back-up power sources and waste-to-energy production.

The EPA requested that the EIS provide a detailed discussion of ambient air conditions, National Ambient Air Quality Standards, criteria pollutant non-attainment areas, and potential air quality

impact of the project for each fully evaluated alternative, including discussion of construction-related impacts. Portions of Guam near the Cabras power facility and the Tanguisson Power Plant are designated as non-attainment for sulfur dioxide. The EPA indicated that the project will need to comply with Clean Air Act Section 176 and EPA's general conformity regulations at 40 Code of Federal Regulations Parts 51 and 93. The EPA also stated that the EIS should address the applicability of those regulations and how project actions, including construction emissions subject to GEPA jurisdiction, conform to an approved implementation plan, and consider non-attainment areas in siting project facilities.

EPA indicated that the EIS include a thorough analysis of emissions estimates of criteria pollutants and diesel particulate matter from construction of the alternatives and disclose available information about health risks associated with vehicle emissions and mobile source air toxics. The EPA recommended including a construction emissions mitigation plan and provided a list of mitigation measures that should be included in that plan (see the EPA comment submission in Appendix G).

The EPA indicated that the EIS should contain a comprehensive air impact analysis. The EPA recommends the Navy and JGPO consider installation of an air quality monitoring network in Guam as part of the buildup activities. It would represent the air quality in and around the two sulfur dioxide non-attainment areas; the collected data could assist Guam to document its air quality status and could be used to support future redesignation to attainment.

The EPA recommended that the EIS discuss project elements that will be major contributors to greenhouse gases and identify practices or project elements that will be incorporated to meet the goals of EO 13423 in terms of greenhouse gas reduction. EPA referred the DoD to its website for information on its Waste Reduction Model, a lifecycle model for tracking greenhouse gas emission reductions and energy savings from various waste management practices.

The mayor and vice mayor of Barrigada expressed concern about the impact of both the U.S. Marine relocation and the placement of the U.S. Army BMD task force on air quality. The Bureau of Statistics and Plans indicated a concern about air pollution connected to the military buildup (e.g., airborne particles and toxic gases), and inquired whether the military would control and monitor its activities to safeguard and ensure Guam's good air quality.

#### **4.3.17 Surface Water**

The EPA is concerned with spills as a possible source of groundwater contamination, particularly the potential impact of spills on the sole source aquifer. The EPA stated that every effort to maximize protection from spills should be implemented. The EIS should identify all activities under the proposed action that could potentially affect groundwater, all potential contaminants associated with the proposed action's activities, and measures that would be taken to protect groundwater.

The GEPA indicated the need to address storm water issues. The GEPA requires all storm water disposal up to the 20-year, 24-hour storm event be contained on the site of the proposed facilities and this must be recognized as part of the proposed mitigation for storm water generation, along with impacts of deviation by the DoD from the GEPA enforceable practices and policies. The GEPA indicated that new expansion construction and upgrades to air strips, wharves, roads, parking areas or other impervious surfaces should have management controls consistent with GovGuam's legally applied storm water management practices.

The GEPA indicated that the EIS should identify the storm water management practices and design features that will be incorporated into planning to prevent pollutants from entering waters during construction and subsequent operation and those activities must comply with the EPA's NPDES permits.

A number of other commentors expressed concern about increased impervious surfaces resulting from implementation of the proposed action and their associated effects on storm water run-off .

#### **4.3.18 Cumulative Impacts**

The GEPA's comments indicated that the EIS must address as thoroughly as possible the cumulative impacts of all individual projects and developments directly and indirectly caused by military expansion on Guam. The GEPA requested that the EIS:

- Include more summary tables of ongoing and expected projects.
- Assess cumulative and interactive impacts of each proposed project along with local future development/growth.
- Discuss the compatibility and interdependency of projects and ways to mitigate overall impacts.
- Include analysis of impacts from transient DoD personnel and construction and service workers in all issues addressed in the document.
- Include analysis of cumulative impacts to the health of the island's ecosystems.
- Include analysis of impacts indirectly caused by military activities (e.g., increased property sales, production of barracks for construction workers, etc.); a logical reference point for measuring cumulative impacts in terms of environmental conditions at a certain point in time must be established.

The EPA noted that a thorough cumulative impacts analysis should be performed which includes impacts from this project and "all reasonably foreseeable future actions by the DoD agencies or entities" and identifies how resources, ecosystems, and human communities of concern have already been affected by past or present activities in the project areas. The analysis should characterize these resources in terms of their response to change and capacity to withstand stresses, and identify the additional stresses that will affect the resources. The EPA provided sources of guidance and the DoD use that guidance as a systematic way to analyze cumulative and growth-related impacts for the project.

The Guam Department of Agriculture also indicated that the EIS should address direct, indirect, and secondary cumulative impacts of all past, present, and future projects on the marine and terrestrial environment; power, water, and other infrastructure; socioeconomics; land use; and so forth. The Western Pacific Regional Fishery Management Council is concerned about assessment of cumulative impacts on Guam's marine resources.

#### **4.3.19 Hazardous Materials/Hazardous Waste**

GEPA indicated that the EIS should address management practices for and potential impacts of hazardous waste; impacts from increases in imports, generation, or storage of toxic chemicals; impacts insecticide, fungicide, rodenticide, and microbicide use; and impacts of residuals of bullets, shell casings, and firearms on designated firearm training areas. The GEPA indicated that the DoD should have contingency plans that outline procedures to be followed in case of discovery of adverse

environmental conditions during the buildup (e.g., buried or submerged drums and containers, contaminated soil/groundwater, unexploded ordnance, and so forth).

The EPA indicated that the EIS should:

- Address potential direct, indirect, and cumulative impacts of hazardous waste from construction and operation of the proposed project.
- Identify projected hazardous waste types and volumes.
- Identify expected storage, disposal, and management plans.
- Evaluate measures to mitigate generation of hazardous waste, including assessment of alternate industrial processes using less toxic materials.
- Consider the broadest range of feasible pollution prevention measures.
- Address how hazardous and other wastes from ships will be managed.

The Bureau of Statistics and Plans asked about the DoD's measures to address hazardous materials and their potential impacts on land use, water use, the marine and terrestrial environments, and the health and safety of the community. Further questions included inquiries as to how the materials would be disposed of, how much would be generated and how they would be handled, and the nature of control and emergency measures. The bureau further asked what measures would be applied to debris unearthed during excavations on land formerly used as defense sites to ensure that no threat is posed to human health or the environment.

Individual comments were received on the subject of potential oil spills and other hazardous waste accidents. The Port Authority of Guam asked that the EIS address mitigation plans for oil spills and the potential environmental impact and containment plans in the event of a nuclear accident resulting from CVN berthing.

Some commentors complained about past DoD hazardous wastes practices and the number of remaining environmental sites on Guam, and expressed concern that this problem would continue with the military expansion, in some cases mentioning specific chemicals of concern. One commentor indicated that the military "contaminated the harbor with PCBs, that the Navy must clean up the waters of the naval station, and that the military must clean up the Ordot landfill.

GEPA indicated that the EIS should include installation restoration sites in the analysis of the best alternatives for development sites. One commentor expressed concern about increased levels of hazardous and non-hazardous waste disposal, concern about the related potential for diversion, dumping, or leaking, and concern about potential plans by the military to build additional landfills or an incinerator.

#### **4.3.20 Proposed Action**

##### **Lack of Information**

Guam's governor, the Honorable Felix P. Camacho, indicated that the CMTF, which he established by executive order, prepared its comments based on the information available, and that those comments represent an initial assessment of the needs of the contributing member organizations. The governor stated that it is critical that more information be gathered to enable the CMTF to

narrow its assessment and understand exactly the potential overall impacts of the proposed activities on the community and the environment.

The CMTF Housing Subcommittee report contained information on the types of additional detailed data required to project future needs of the local and military communities, to include demographic data, housing reports, crime statistics, public transit use, numbers of privately owned vehicles, access to social welfare programs, and access to medical services.

Senator Pangelinan asked how EIS studies could be conducted given the uncertainty in the military plans of the final number of personnel and their dependents anticipated in Guam.

Other comments pertain to the lack of specific information on the proposed action and the impact of that lack of information on the ability of agencies and individuals to comment other than broadly. Some agencies further indicated that the lack of information negatively impacted their ability to plan for the military expansion in terms of additional staff; equipment; and facility, computer, and communications requirements. GEPA, the Department of Public Health & Social Services, USFWS, and others stated the need to have additional information when it becomes available.

The DRT requested information on anticipated numbers of civilian and military personnel and the anticipated numbers of new investors in order to meet demand and to gauge the impact of new business licenses and increased taxpayer base. The Bureau of Statistics and Plans needs detailed demographic data on military personnel and dependents to project future needs of the local and military groups. The Department of Corrections needs historic information to evaluate the impact of the increased military presence on the prison system on Guam (e.g., the department cited the need for 300 additional cells if 2 percent of the proposed military personnel were in violation of laws for which local authorities have primary jurisdiction).

The Department of Parks and Recreation and Historic Preservation will need information on the volume, location, and nature of construction projects. The GIAA needs information on projected growth in passenger, cargo, and aircraft traffic both for immediate planning purposes and because its current and planned improvements are based on projected growth of commercial aviation without consideration for increases associated with the proposed action.

The Guam Department of Agriculture noted the absence of critical information needed to review and comment on the notice of intent, and criticized the lack of clear proposed actions and possible alternatives as violations of CEQ 40 Section 1508.22 (a) regarding the notice of intent.

Some individual comments contained questions and requests for information from the JGPO, for example: exactly where the proposed actions would be located, how much land would be needed, what kind of impact indicators the military is looking at.

#### **4.3.21 International Safety**

Commentors on both Guam and Tinian expressed concern that the increased military presence on Guam and the potential for military presence on Tinian could make the islands targets. One commentor indicated that plans should be made to ensure the safety of the civilian population from foreign aggression. A commentor on Guam asked whether the military would protect the citizens if an attack occurred. One commentor recommended that the military and Government of Guam cooperate to establish plans and places for the public to use in the event of attack, and asked what systems would be used to inform the public of danger. Others commented that they felt better and

more secure in terms of international threats because the military is there and will have even more of a presence in the future.

The report submitted to the CMTF by the Subcommittee on Health and Human Services indicated a concern over the threat of attacks. The report mentioned food defense and terrorism and the potential risk of intentional food contamination as concerns because Guam is considered a strategic location, and discusses steps to reduce risk in the community.

#### **4.3.22 Use of Local Expertise/Community Members**

Commentors strongly recommended the use of local expertise to assist with the analyses required during the EIS process and involvement of community members throughout the project. Recommendations for using local expertise included tapping into the resources at the University of Guam (engineers, scientists, and other technical experts) and using the resources of the local Filipino-American community. A commentor from that community observed that the Filipino-American community represents between 25 and 35 percent of Guam's population and provides a vital source of labor, from non-skilled to professional levels. The commentor indicated that this community would "be honored" to assist and requested that the community's available talent in terms of builders, planners, construction managers, architects, and engineers be included in military planning and build-up opportunities.

Several individual commentors provided personal background information, offered assistance on the project, and provided contact information. One commentor recommended using local expertise in collecting environmental data, citing a prior situation where an off-island contractor's unfamiliarity with local species resulted in incorrect tallies. Another indicated that members of the local community "should be part of the study group and their voices should be heard...part of the decision-making process rather than just bystanders." Some comments contained suggestions for partnering opportunities.

Representatives of the Chamorro community indicated both the desire to participate and the opinion that involvement of representatives of the Chamorro population is essential to the success of the project and its ultimate acceptance. Further, some commentors viewed inclusion of Chamorro representation as essential to offset feelings of alienation and isolation in the Chamorro community that could have far-reaching social impacts.

Several agencies submitted comments stressing the mutual benefits of consulting with local agencies on ongoing master planning efforts and of coordination between the military and local agencies on individual subject area analyses, particularly those pertaining to infrastructure.

The Bureau of Statistics and Plans indicated that because the socioeconomic assessment would evaluate proposed impacts on a community's social and economic welfare, the process should involve community members who may be affected, including community leaders and representatives of diverse interests such as community service organizations, development and real estate interests, minority and low income groups, and government agencies.

Multiple commentors viewed community involvement as critical to the success of the project and to its acceptance by the residents of Guam. Recommendations ranged beyond what is legally required for an EIS process under NEPA, from extending the public outreach program in order to keep communities informed throughout the process (e.g., through monthly reports, use of a website, talk radio, additional meetings, etc.) to Senator Guthertz' recommendation that the JGPO's forward

office be located off base, rather than near Commander, Naval Forces Marianas headquarters. One commentor provided a list of recommendations for communication with the public that ranged from establishment of a website to a weekly newspaper column and outreach through public libraries and the mayors' offices.

The Honorable Felix Camacho, governor of Guam, indicated the need to continue the existing dialogue between the military and the CMTF as the planning process goes forward.

One resident of Tinian suggested that the military hire locals to assist in facilitating "any function deemed necessary."

#### **4.3.23 Support for Relocation**

Some comments contained concerns and questions without expressing a positive or negative view of the proposed action.

#### **Positive Reaction**

The CMTF indicated overall support for the project but included subcommittee reports which expressed specific concerns, made recommendations on what the EIS should contain in terms of impact and mitigation analysis, and expressed the need for additional information to assist with planning. Most local elected officials indicated their support for the project but submitted concerns and recommendations.

The Guam Visitors Bureau stated, "You will find that you have a very supportive community on Guam." As previously cited, a 2007 survey by GCOC showed 71 percent of Guam's residents supporting an increased military presence. Fourteen percent were opposed, and 15 percent were either neutral (9 percent) or didn't know (6 percent). The majority of comments from Tinian supported the proposed action, citing anticipated improvements in the island's economy, job opportunities, infrastructure, and security. One commentor from Tinian indicated that the "overwhelming majority" would like to see some movement to Tinian more than ever now...."

In many cases, both in comments received at the meetings and afterwards, people expressed support for the proposed action but voiced concerns about potential impacts in various areas.

#### **Negative Reaction**

The commentor previously cited who recommended educating the Chamorro descendants of the 1898 Chamorro inhabitants about their political status and holding an island-wide plebiscite on self-determination, indicated that without these steps "relocation of Marines to Guam is merely another assault on the island of Guam and its people in the name of American 'freedom and democracy,' which allows neither to the Chamorro people in their homeland."

Another commentor indicated, "No more U.S. military build-up and expansion – there's already too much U.S. military on Guam. If anything, there needs to be support from the U.S. to help us exercise our self-determination, not to keep us as a colony of people, and to help us towards a true democracy that we have been denied for so long...."

A third commentor indicated that the increased military presence in the CNMI would "affect the islands in a bad way. It will change the character and could hurt tourism from other countries.... STAY AWAY!" Another commented that bringing more people to Guam will exacerbate the

problems [of infrastructure inadequacy]. One commentor indicated that “the military will always snatch to get ‘theirs’ first at the expense of the local civilians to have very little to none.”

Negative comment from Tinian concerned the failure of the DoD to use the land it has held for 30 years, keeping it from productive use by island residents and negatively impacting the island’s economy. On another subject, one commentor indicated that, “They are here again, making promises. During the covenant negotiations some military officers came and promised that the military will open up its market for farm produce – never happened. What happened?”

Another commentor from Tinian asked, “Why not tell the people your final intent, not what you want us to hear?” The commentor cited the number of men and women who have served and are serving “Uncle Sam” and concluded, “It’s time Uncle Sam [did] something for the people of Tinian.”

#### **4.3.24 NEPA Process**

Twenty-eight comments concerned the NEPA and EIS processes.

The Guam Department of Agriculture stated that the notice of intent “shall briefly (a) describe the proposed action and possible alternatives....” and commented that the lack of a clear description of the proposed actions and possible alternatives violates CEQ 40 Section 1508.22(a) regarding notice of intent. The department also commented that each proposed action should have been announced as a separate notice of intent.

In terms of purpose and need and alternatives, the EPA indicated the EIS should explore whether locations outside of Guam are practicable for any aspects of the project, and recommends a “full and complete examination of potential alternatives....” the EPA indicated that the EIS must clearly document reasons that alternative locations are infeasible or it will not meet the purpose and need. Further, the EPA indicated that the EIS should present environmental impacts of the proposal and alternatives in a comparative form.

Hope Cristobal of the Chamorro Studies Association commented that the EIS must inform the public of the design of the Guam military buildup rather than justify decisions that have already been made. She commented that a genuine no action alternative must be included, and that the EIS must address subsequent and cumulative impacts associated with the proposed plan, include adequate public disclosure and public information to Guam’s bilingual community, and must consider inclusion of “any written agreement to clean up, rehabilitate, and/or compensate for damage resulting from known risks (such as road damage).”

Several comments suggested consideration of activities that would broaden the normal NEPA process. For example, the Western Pacific Regional Fishery Management Council recommended that the Navy conduct public scoping sessions in every Guam municipality. More than one commentor recommended a separate EIS for each individual project. The Guam State Clearinghouse recommended consistent and updated reviews of the project impact during its operational phase to correlate with anticipated scoped findings, and asked whether there would be designated points of contact for social, economic, and infrastructural impacts during that phase. Another commentor asked who the decision-maker is for the proposal.

One commentor recommended that all studies be conducted by contractors independent of the military and in partnership with local institutions and experts and that the EIS include a full disclosure policy in terms of providing interim details to the public of approaches to impact

assessment and mitigation plans, with the recommendation that all announcements be made through all print and electronic media, within ten days of any decision made. The commentor further commented that in the event details and data are inadequate for proper assessment of impacts, no implementation occur until the assessment is complete.

Another commentor indicated that additional scoping meetings should be held when more information is available. Another asked what national defense circumstances would override, modify, or cancel NEPA requirements pertaining to the proposed actions and preparation of the EIS.

Commentors expressed confusion about the designation of the study as an overseas environmental impact statement because to date no proposed activities in waters beyond 12 miles from shore have been named.

#### **4.3.25 Radiation**

GEPA indicated that the EIS should assess the current level of radioactivity in Apra Harbor, and address possible or perceived impacts to health and land use from electromagnetic radiation and from nuclear radiation related to military activities. One commentor cited concern over the potential for increased radioactive exposures from weapons systems that may be stored and used in training along Guam's coastal areas.

#### **4.3.26 Regulatory Agency Capacity**

Comments received from some agencies expressed concern that they would be unable to meet the demands placed upon them from all aspects of the proposed military expansion – the increase in permanent population, pre- and post-construction activities, and sustained monitoring of long-term activities.

The Department of Parks and Recreation sees the need for increased resources. Of primary importance is that staff will be needed in the Historic Resources Division to accommodate increased construction permitting demands; the department sees this as a potential bottleneck and recommends federal government funding to fully staff the Division of the Guam State Historic Preservation Office to address this need. The department also needs additional staff to address increased use of public parks by the increased population, including more lifeguards and other recreational workers.

The Customs and Quarantine Agency sees impact in terms of increases in customs law enforcement actions at the point of entry (POE), given the immigration of temporary, foreign workers; increases in interdiction of prohibited items and contraband at the POE; increases in arrests, citations, and other law enforcement actions; increases in customs enforcement activities; potential for incident response due to hazardous material or weapons of mass destruction-type accidents at the POE; and increased homeland security procedures. The agency believes the anticipated impact will strain an already underfunded department and small staff. The agency notes there is no cost recovery for services it provides at Andersen AFB, the naval station, or other military activities, and notes that it maintains an office in the Air Mobility Command Terminal on Andersen AFB at no cost to the DoD.

The DRT stated that it operates currently under circumstances of inadequate staff, computer equipment, and supplies and field equipment; the need to update its Internal Revenue Codes and other manuals, regulations, and subscriptions to various research institutions; and the need for a permanent facility to house its functions. Funding is not available for current needs, and the bureau anticipates an increase in demand for its services as a result of the military expansion, particularly in terms of enforcing tax laws, ensuring that Section 30 monies are reported and recovered, and related

matters. The DRT commented that it receives a minimal amount of payment in lieu of tax monies from the federal government, which occupies 30% of the island's real estate.

The Judiciary of Guam expects direct impact and exponential increases to existing work/caseloads in the areas of criminal felonies and misdemeanors; domestic cases; juvenile cases; and others, including civil, probation, small claims, traffic citation. The Judiciary expressed a need for more judicial officers to handle its current caseload, and anticipates an increased need for personnel, and associated furniture, equipment, computer technology, networking infrastructure, and communication capability.

GEPA stated concerned about the impact of the increased military presence on its ability to provide its mandated regulatory and compliance oversight of waste water; drinking water; clearing, grading, and excavation permitting; water quality certification; construction and demolition debris permitting; hazardous waste monitoring, permitting, and enforcement; air quality permitting and monitoring; impacts related to temporary workers; new road construction permitting and review; and quarried material permitting and review. GEPA expressed concerned that, in addition to work generated by the military expansion, "urgent and well funded DoD development projects" will lure needed staff from the agency; some key staff have left already, increasing the impact on the ability to fulfill agency mandates.

The Bureau of Statistics and Plans cited the need to recruit personnel to conduct reviews of military projects and housing and economic studies to ensure that social, housing, education programs, infrastructure, and public services are properly in place. The Department of Corrections expressed the need for additional personnel and facility and equipment expansions/improvements.

In addition to regulatory agencies, other organizations and agencies on Guam are addressing their ability to meet anticipated increases in demands.

The police department cites limited personnel and other resources, as mentioned previously in subsection 4.3.5. The department has lost police officers and civilian employees as a result of an early retirement law enacted in 1999. Among the effects are delayed response time, discontinuation of some crime prevention programs, and backlog of cases. There is a shortage of vehicles (shortfall of 197) and equipment (particularly personal protective equipment [PPE] and ammunition - \$1.4 million), facilities are outdated and inadequate, and computer and communications equipment is obsolete. There is no funding to enhance the department's preparedness level (facility improvements alone are estimated at \$44.5 million). The report from the police department suggests assessing the possibility of DoD's providing military police in the form of a permanent shore patrol to assist with law enforcement.

The fire department will be requesting additional manpower, fire and rescue gear, and fire and rescue vehicles to meet anticipated increased demands. The department will need several new fire stations in what it refers to as strategic locations throughout Guam to adequately protect the planned expansion. At this time the department sees the need for 144 additional personnel and \$1.8 million in PPE, among other significant and unfunded needs.

The Guam Memorial Hospital Authority reports a shortage of healthcare professionals across all specialized areas, financial concerns (only 6 percent of a subgroup of 24 percent of self-pay patients actually pay), the need to renovate and increase the capacity of the current facility (a shortage of beds is anticipated if this does not occur), the need for a multi-year strategic plan to upgrade its information technology, the need to upgrade and/or replace hospital equipment across all areas, the

added problem of the seven-hour flight time to the closest urban state for supplemental assistance, and the need for financial support. The organization, in a survey for the CMTF Subcommittee on Health and Social Services, says it hopes to augment its professional staff with military dependents or part-time active duty personnel, to explore federal funding opportunities, and to collaborate with the military, whereby military health facilities (U.S. Naval Hospital Guam and the Andersen AFB clinic) could be shared.

#### **4.3.27 Construction**

Commentors expressed concern about the ability to accommodate the requirements of anticipated construction activities, from managing large increases in the numbers of trucks and other vehicles on the roads to the quantities of cement that will be required. The Guam Visitors Bureau understands that the total cement/aggregate/delivery industry can accommodate 30 percent of what is perceived to be, at times, \$2 billion in construction activity per year. The bureau also is concerned that ways must be found to reduce the impact on Guam and its ability to deliver required services. The bureau also is concerned about the need for the highest level of coordination to successfully manage multiple vendors, contractors, and thousands of employees (and has consulted with JGPO on this issue already).

The Guam Visitors Bureau and other commentors recommend that the CNMI participate in the process. CNMI has unoccupied barracks, sites for fabrication of cement, and facilities for wood making. The Visitors Bureau believes that opportunities to collaborate with CNMI would both contribute to their economy and alleviate some of the potential problems on Guam posed by the magnitude of the construction effort.

Some commentors discussed concerns about the ability of the port to accommodate anticipated construction activities. GCOC sees the port “as the long pole in the tent” in terms of the forthcoming construction effort. GCOC says the port is “decades behind in ‘thru-put’ capacity for the billions worth of construction supplies, materials, and equipment that will be brought into the island;” and argues that some type of commercial venture will be required to rectify this situation by developing, funding, and constructing/operating a contemporary port operation, including expansion of the current facility.

Further, in its written comment, GCOC recommended that the JGPO’s comprehensive construction program facilitate use of major off-island contractors and temporary workers, partner with local institutions to expand training programs to produce local skilled workers for the future, and provide local business opportunities.

In an additional comment, the GCOC recommends using the CNMI as a construction and materials staging area; pre-fabricated units could be shipped to Guam from the CNMI, thus reducing both the labor and on-site construction load.

Questions arose about the anticipated timeline for construction, whether Japanese contractors would be used, assurance of contractor capability and integrity, and related issues.

#### **4.3.28 Other**

##### **Environmental Justice**

The EPA cited EO 12898, Federal Actions to Address Environmental Justice (EJ) in Minority and Low-income Populations (February 11, 1994), and indicated that according to the 2000 census,

23 percent of individuals living in Guam are currently functioning below the poverty level. EPA indicated that the EIS should include an evaluation of EJ populations within the geographic scope of the project; the EIS should address the potential for disproportionate adverse impacts to minority and low-income populations and the approaches used to foster public participation by these populations, and reflect coordination with the affected populations. EPA indicated that because of the potential EJ impacts of the project, all infrastructure improvements be coordinated with GovGuam to ensure that local populations also benefit from the improvements and that the project does not create a disparity in standards of living between the civilian and military populations.

The Bureau of Statistics and Plans indicated that it is critical to devote attention to potential impacts on vulnerable segments of the human population, and that some demographic groups may be disproportionately affected by the proposed development (e.g., adolescents, the unemployed, women and members of groups that are racially, ethnically, or culturally distinctive). The bureau stated that no category of persons...should have to bear the cost of adverse social impacts.

### **Erosion Control and Dredged Material Management**

The GEPA stated that all proposed activities involving clearing and grading comply with best management practices applied throughout Guam. Further, the GEPA indicated that stormwater best management practices and erosion control measures be implemented for construction and post-construction phases, and that proper permitting and local government clearances would apply to the project.

The EPA stated that the EIS should discuss the anticipated volume of dredged material that will be generated and options for management. The EPA indicated the agency is working with the Navy to identify an ocean disposal site for clean dredged material outside Apra Harbor, but only for clean material that cannot be beneficially reused. The EPA recommends survey level sediment characterization begin prior to the November 2009 planned beginning of dredged material characterization to obtain estimates of the amount of upland disposal areas that would be required for management of contaminated sediment.

### **Climate Change and Global Warming**

The EPA recommended that the EIS evaluate the potential for impacts of climate change on the project in terms of sea level rise, increases in climatic variability, and increases in extreme weather events when considering placement of facilities.

At the meeting on Saipan, an attendee submitted a report by The CAN Corporation entitled *National Security and the Threat of Climate Change*. The CAN Corporation indicated that the consideration of rising sea levels due to global warming should be incorporated into the analysis when determining locations for military facilities so they would not be jeopardized in the future.

### **Miscellaneous**

Guam Homeland Security/Office of Civil Defense requests assessment of the feasibility of a 24/7 Joint Operations Center to ensure collaborative efforts of the DoD and the local and federal governments to ensure readiness and responsiveness to the increased citizenry, examination of DoD-Government of Guam tropical cyclone warning and notification systems and impacts on a population that is unfamiliar with those systems, and DoD funding to upgrade and maintain the Government of Guam very high frequency communication system that the DoD currently uses.

Several commentors asked “Why Guam?” Another commentor asked why not go to U.S. possessions other than CNMI. One commentor asked the DoD to specify what national security and alliance requirements led to [the proposed action].

GEPA also suggested that the EIS address impact to animal facilities, quarries, and pets.

Several commentors supported the need for innovative solutions to address the complex planning and construction needs.

Several commentors discussed the potential for risk of cancer and other illnesses resulting from military activities, based largely on historic activities in the region that have proven to be detrimental.

Several commentors posed questions about reparations for various circumstances. One commentor asked when war reparations would be paid to Chamorro descendants; would the DoD provide compensation to families on Guam who may have lost personal property, income, lands, businesses, homes, and monies; would the DoD assist the people of Guam to lobby the U.S. Congress for compensation for effects of possible nuclear fallout from the Bikini Island test sites; who will be responsible for compensating the Government of Guam because of the migration of people from the Federated States of Micronesia, Belau and other countries or the military buildup; and when will the Chamorro people be afforded a letter of apology from the Japanese government for the atrocities of World War II.



## 5.0 CONCLUSIONS

Analysis of the comments received confirms that there is widespread interest in the proposed action in Guam and the CNMI. Most comments indicated questions and concerns in one or more resource areas. Key issues are:

- Belief that existing infrastructure (water, wastewater, solid waste, electrical) on the three islands cannot support the proposed action and belief that the current status of the services/resource areas on the island would be overtaxed by the influx of people during construction and operational phases of the proposed action.
- Socioeconomic issues were identified as issues of great concern and interest, but for construction and operational phases of the proposed action. This includes physical infrastructure, social infrastructure, economic benefits, cultural resources (effects on Chamorro culture), political issues (effects on statehood initiatives), private property issues, construction capacity, housing, public safety, and recreation/access issue.
- Concerns about how improvements to infrastructure will be addressed (i.e., whether the military would partner with Government of Guam and improve infrastructure to the mutual benefit of the civilian and military communities or just add new infrastructure to accommodate military needs.
- Impacts on transportation. Vehicular traffic: increased numbers of vehicles on the road, congestion, increased numbers of accidents. Mass transit: concern about addressing existing inadequacies in the face of increased and geographically expanded demand.
- Impacts of the proposed action on natural resources, such as terrestrial and marine ecosystems, wildlife, and marine mammals.
- Capacity of agencies and departments of Guam to accommodate the anticipated increase in population and the demands for various services the increase will generate.
- Actual ability to implement the construction needed for the buildup, given the unprecedented magnitude of the effort.
- Social, health, and economic concerns including personal safety in local communities, and also quality of life.
- Extensive interaction with local agencies and departments will be required to facilitate construction and implementation.
- A large number of commentors included requests for mitigation of impacts in the resource areas that were of concern to them and it can be anticipated that those commentors will follow up to determine whether or not mitigation is adequately addressed.

There is significant interest on the part of the commenting public in being involved in the EIS analysis process and in ongoing communication with the Navy and JGPO as the project moves forward. A number of agencies and individuals specifically offered assistance that could prove useful as the analysis moves forward in (1) indicating willingness to work with the local community, (2) providing local expertise that could be helpful to off-island contractor personnel, and (3) forging relationships between the Navy and the community that would be mutually beneficial in the future.

