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U.S. ARMY CORPS OF ENGINEERS, HONOLULU DISTRICT FORT SHAFTER, HAWAII 96858-5440

02 July 2020

Environmental Programs Branch Program and Project Management

SUBJECT: Documentation of Consistency Determination under the Coastal Zone Management Act with Guam Coastal Management Program, Guam Bureau of Statistics and Plans for the Lonfit Ammunition Depot and Vicinity (FUDS Property No H09GM0300) located on Nimitz Hill, Asan Municipality, Territory of Guam.

Mr. Edwin Reyes Administrator Guam Coastal Management Program Bureau of Statistics and Plans P.O. Box 2950 Hagatna, Guam 96932

Dear Mr. Reyes:

The U.S. Army Corps of Engineers (USACE), Honolulu District is providing a Consistency Determination and supporting documentation under the Coastal Zone Management Act (CZMA) §307(c)(1) and 15 Code of Federal Regulations (C.F.R.), Part 930, Subpart C for the Lonfit Ammunition Depot and Vicinity Formerly Used Defense Site (FUDS) (Property No. H09GM0300) located on Nimitz Hill, Asan Municipality, Territory of Guam. The USACE seeks concurrence with the consistency determination that our proposed federal action is consistent to the maximum extent possible with the enforceable policies of the Guam Coastal Management Program (GCMP).

USACE's proposed federal action is to remove and dispose sixty-two (62) 55-gallon drums from Quonset Hut B at Lonfit Ammunition Depot and Vicinity. This site is located within an abandoned ammunition storage area previously known as Area 6A, Fifth Field Depot, Ammunition Storage. Fifty-nine (59) drums contain asphalt-like material and three (3) drums contain a basic liquid suspected to be sodium hydroxide solution. The proposed activities associated with the drum removal and disposal are expected to last for a month from mobilization to clean-up.

In April 2020, USACE started coordinating with GCMP staff from seeking guidance and advice for the process and the types of supporting documentation necessary for the Lonfit Ammunition Depot and Vicinity FUDS drum removal and disposal. In the discussion, it was determined that the following documents would support our consistency determination:

- A completed Guam Coastal Management Program Assessment (GMPA) Form;
- Copy of the initiation letter to U.S. Fish and Wildlife and the enclosed Biological Assessment that contains detailed description of the proposed project, maps on the location of the proposed project, and path to remove the drums; and
- 3. Copy of the USACE Draft Record of Environmental Consideration

The GCMP defines the "coastal zone" of Guam to include all non-federal property within the Territory, including offshore islands and the submerged lands and waters extending seaward to a distance of three (3) nautical miles.

The removal and disposal of the 62 drums would occur within Guam's "coastal zone" as defined above. The USACE believes there is a potential for these activities to have direct and indirect effects on Guam's coastal uses or resources, as described in the attached completed GCMP Assessment Form. Therefore, under 15 C.F.R. 930.33, USACE's proposed action is subject to CZMA federal consistency requirements.

This consistency determination has been prepared in accordance with Guam's *Guide Book to Development Requirements on Guam* (Bureau of Statistics and Plans 2020). USACE's evaluation of the enforceable policies of the GCMP is contained in the GCMP Assessment form.

Based on the information, data, and analysis contained in the attached completed GCMP Assessment Form and in the enclosed documents listed above, the USACE finds that its proposed federal action is consistent to the maximum extent practicable with the enforceable policies of the GCMP.

The USACE seeks concurrence with our consistency determination. We will presume concurrence if we do not receive a response within 60 days from receipt of our consistency determination.

We look forward to receiving your concurrence soon. Should you have any questions or require additional information, please contact Ms. Madelyn Martinez, Branch Biologist, at (808) 835-4103 or e-mail, madelyn.t.martinez@usace.army.mil.

Sincerely,

David Griffin Chief, Environmental Programs Branch Program and Project Management

Enclosures