



CIVILIAN MILITARY TASK FORCE:
Response to Federal Register Vol. 72 No. 44
Announcement Dated March 7, 2007

Marine Relocation, Transient Nuclear Aircraft Carrier (CVN) Berthing,
and Army Ballistic Missile Defense (BMD) Task Force

GOI-60.164

PRESENTED BY:

Felix P. Camacho
Governor of Guam

MAY 2007



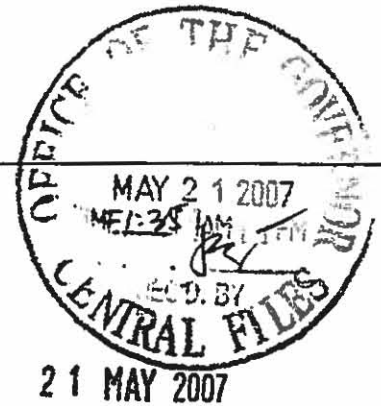
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Felix P. Camacho
Governor

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Major General (Ret.) David Bice
Executive Director
Joint Guam Program Office
ATTENTION: EV2
258 Makalapa Drive, Suite 100
Pearl Harbor, Hawaii 96860-3134

Dear General Bice:

Hafa Adai! Thank you for this opportunity to submit the Civilian/Military Task Force's scoping comments in response to the March 7, 2007, Notice of Intent regarding the military expansion on Guam. These comments are submitted as a prelude to further opportunities for comment as more information becomes available and scopes are narrowed.

I created the Civilian/Military Task Force through Executive Order No. 2006-10 to work with the federal government in preparing Guam for the influx of military personnel over the next decade. I invited a broad cross-section of the community to come to the table and take a role in the planning process for this enormous undertaking by the U.S. military and the government of Guam.

The Civilian/Military Task Force is developing an integrated comprehensive master plan to accommodate the expansion of military personnel, operations, assets and missions and to maximize opportunities resulting from the expansion for the benefit of all the civilian and military community.

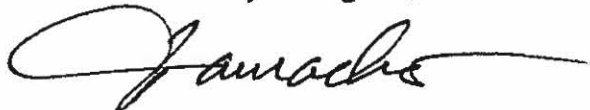
Government and community leaders are working together to ensure Guam is prepared, not just for the impact of the movement, but also for the opportunities this can bring for our people. We greatly appreciate the consistent tone coming from Washington, D.C. that this buildup must be mutually beneficial; because what is good for Guam is good for the military and the United States. That is why we are very excited to be a partner in this process and why we take our role and responsibility to prepare for the expansion very seriously.

The Civilian/Military Task Force prepared its scoping comments, which represent only an initial assessment of our needs based on the information available from the federal

government. We understand this is an enormous project with far-reaching effects, which must be considered holistically. But in order to determine the cumulative impact, we must have the opportunity to participate in this same dialogue as the planning process continues. That is why it is critical we gather more information so we can narrow our assessments and know exactly the overall impacts to our community and environment based on each activity to be undertaken over the next decade.

The people of Guam are ready and eager to make the improvements which will prepare our community and the military for this movement. The availability of information about the buildup will help us to prepare our infrastructure, sustain environmental quality and improve the quality of life on Guam. These enhancements to our island will benefit our people and the military expansion as one community.

Sinsiru yan Magåhet,

A handwritten signature in black ink, appearing to read 'F. Camacho', with a long, sweeping horizontal line extending to the right.

FELIX P. CAMACHO

I Maga' Låhen Guåhan

Governor of Guam

attachments



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MAY 2007

Guam Civilian-Military Task Force
Contributions for Inclusion in "scoping process" for the Environmental Impact
Statement / Overseas Environmental Impact Statement (EIS / OEIS)
May 2007

Guam's Civilian Military Task Force (CMTF) and its Subcommittees have convened to discuss the myriad of issues related to:

1. the relocation of U.S. Marine Corps (USMC) forces to Guam;
2. the improvement of pier / waterfront infrastructure for transient U.S. Navy Nuclear Aircraft Carrier (CVN) at Naval Base Guam;
3. the placement of a U.S. Army Ballistic Missile Defense (BMD) task force on Guam;
4. the enhancement of infrastructure and logistics capabilities;
5. the social, cultural and economic implications; and
6. the effects upon Guam's environment.

The CMTF hereby submits its comments for inclusion into the "scoping process" for the Environmental Impact Statement / Overseas Environmental Impact Statement (EIS / OEIS). This document includes verbal & written contributions from the Public and Private sectors of our Island.

It is not the CMTF's intent that this document be Guam's single contribution. It should not be assumed that this document addresses all of Guam's contributions to the "scoping" process. Instead, this document highlights some of the key elements that were identified as important by the CMTF membership and government of Guam instrumentalities. The CMTF is aware that there are additional scoping comments that are being submitted by various Government of Guam instrumentalities that are not included in the document. These comments must also be taken into consideration.

It is the CMTF's hope that in addition to conducting a thorough environmental impact evaluation that the EIS/OEIS will also conduct an equally thorough review of the socio-economic impacts. This evaluation should include quantitative and qualitative measurements of the impacts of the proposed development. It should also identify ways to mitigate the impacts. The socio-economic evaluation should address:

- Changes in population;
 - Changes in community demographics;
 - Results of retail/service and housing market analyses;
 - Demand for public services;
 - Demand on Guam's utilities;
 - Demand on all of Guam's transportation infrastructure;
 - Demand for education services;
 - Demand for health care and social services;
 - Changes in employment and income levels;
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- Changes in the allocation of fiscal resources to address the new demands that will be placed upon Guam's government sector; and
- Changes in the aesthetic quality of Guam's community.

One of the major challenges that the CMTF experienced in identifying issues that should be addressed in the Environmental Impact Statement and Overseas Environmental Impact Statement is the many unknowns that were left unanswered in DoD's scoping presentations. The CMTF and each of its Subcommittees feel that it is presumptuous to "assume" any one growth pattern. Most of the comments in this document highlight the lack of information that is needed to plan for growth and to develop and provide meaningful scoping contributions to the EIS/OEIS process.

INFRASTRUCTURE IMPACTS

GUAM WATERWORKS AUTHORITY

BACKGROUND

The Department of Defense has invited comment from the general public and public agencies on the scoping of an Environmental Impact/Overseas Environmental Impact Statement (EIS/OEIS) regarding the repositioning of Department of Defense (DOD) forces in Guam. The projected military buildup on Guam includes the Relocation of U.S. Marines Corps Forces, Enhancement of Infrastructure and Logistic Capabilities, Improvement of Pier/Waterfront Infrastructure for Transient U.S. Navy Nuclear Aircraft Carrier (CVN) at Naval Base Guam, and Placement of a U.S. Army Ballistic Missile Defense (BMD) Task Force in Guam. In addition, the military has proposed projects and force increases such as the extension of Kilo Wharf, development of additional submarine space at Polaris Point and numerous upgrades on Anderson Air Force Base.

The Guam Waterworks Authority (GWA) notes that these actions will have considerable impact on water and wastewater infrastructure and all of these impacts should be scrupulously and conscientiously evaluated within the EIS/OEIS document.

GWA POSITION ON MILITARY BUILDUP

Over the last decades, the national focus has been for DOD to concentrate on defense activities and allow civilian government and private sector professionals to manage and operate support functions such as utilities. Numerous privatization contracts on both the Navy and Air Force installations on Guam illustrate that similar advantages can be had by moving in accord with the rest of the country.

In the past, the DOD on Guam has generally followed an "inside-out" approach to wet utility infrastructure. That is, independent utility infrastructure is constructed on and between military installations to support the primary mission. Excess capacity is sold to the civilian government agencies and facilities are transferred to the same when no longer needed by the military. It appears that a similar approach is being taken with the proposed action.

It is clear that DOD must have access to reliable, redundant, and sustainable utility infrastructure in order to successfully implement its primary mission. The argument for the historical "inside-out" approach to infrastructure development is that such reliable, redundant and sustainable utility infrastructure is not available from the civilian government and private sectors. In the past this was indeed the case. However, GWA believes that this paradigm is no longer applicable. Significant strides have been made to improve all aspect of GWA operations.

Therefore GWA believes that an "outside-in" approach should be given primary consideration in all aspects of utility infrastructure planning pertaining to the proposed military development. First consideration should be given to investment in existing local infrastructure to build the reliability and redundancy that can adequately support the primary military mission and simultaneously benefit the civilian population.

IMPACTS AND SCENARIOS TO CONSIDER

The following sections contain a list of concerns and/or specific options that GWA would like to be considered in the development of the EIS/OEIS. The specific options listed are utility development options that GWA believes can meet both the needs of GWA and DOD. These options may be the most economical and environmentally friendly option to address specific needs and should be given fair and reasonable consideration.

General

- **Direct Coordination Between EIS/OEIS Consultant and GWA:** During the development of the EIS/OEIS, project consultants should coordinate directly with GWA personnel, as delegated by the General Manager, in order to ensure full understanding of the concerns and impacts expressed herein.
- **GWA Water Resources Master Plan (WRMP) Population Forecasts:** The recently completed WRMP forecasts population growth linearly based on historical data. Proposed infrastructure capacity upgrades are roughly based on these population projections. The military build-up has the potential to render the projections and associated project schedules null and void.

Although the current proposal would bring the total number of military personnel on Guam to a number similar to that of previous decades, the total population on Guam has significantly increased since that time. The impact of the proposed expansion will be fundamentally different than in the past. The EIS/OEIS cannot view the build-up simply in terms of on-base impacts. Even in the unlikely event that all additional military personnel and their dependents are all housed on base, the support personnel required to realize the increase in construction and long-term support services will significantly impact off-base population. This will run the gamut from teachers and day care provider for dependents and MWR personnel to expanded restaurants and entertainment establishments that will be developed to serve the increased DOD population.

Demands for water and wastewater loads will rise much faster than the projections in the WRMP, creating a need to revisit long term planning and funding forecasts (as approved by the U.S. EPA). The EIS/OEIS should evaluate WRMP population; recommend more appropriate projections based on military activities; and assess the

impact of revised population projections on WRMP project scheduling and funding projections.

- Evaluate Impact And Magnitude Of Capital Project Cost Increases: The sheer breadth of the proposed build-up will increase competition for A/E consultants, materials, and construction entities. The competition will drive up costs and will negatively impact the ability of GWA to implement much needed capital improvement projects as defined in the Water Resources Master Plan and unrelated to the military build-up. The negative impact will be exacerbated should the military decide to pursue an "inside to out" approach in which infrastructure to support the buildup is accomplished without consideration to the use and improvement of existing local utilities. In that case, GWA's \$100M CIP budget will be in competition with the \$15B DOD project budget. Being "priced out of the market" might mean that GWA would be unable to support these needs.
- Impact On Availability Of Technical Professionals: Significant growth in private developments, much of which is driven by the anticipated military growth, is already being experienced at GWA. Our paired-down staff is struggling to meet current demands. There is a current shortage of the professional and technical staff needed to meet existing workload. The needs gap will be exacerbated as development increases in anticipation of the military buildup. Additional staff will be required in order to insure that new development is done properly and does not become a burden to GWA rate payers.

As the large scale projects to support the DOD plan commence, the demand for skilled professionals in the private sector will increase as well in order to support implementation of these projects. Private financing may lure skilled professionals away from the public sector. It will be very difficult for public sector agencies to compete with private sector financing for these professionals.

- Inspectors will be required to verify that construction is completed in accordance with GWA rules and regulations and consistent with industry standard practices.
 - Professional Engineers will be needed to verify that the existing systems have sufficient capacity to satisfy increased demand and loading; to determine where upgrades are required; and to develop projects to address those upgrades.
 - Certified Operators will be needed to maintain expanded water and wastewater systems. DOD and GWA are already in competition for the few certified operators and skilled technicians available on island; expansion of on-base facilities will increase this pressure on both, while shared facilities would allow continuation of GWA's employee development and training plan.
 - Technicians such as electricians and mechanics are already in short supply on Guam, and additional personnel will be needed for system maintenance and repair.
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- Impact on Cost of Utility Service to GWA Customers: There are many areas of the island in which the GWA does not have a water distribution system but in which the Navy does. In order to provide water service to residential customers in these areas, GWA will enter an agreement with the Navy to buy water and subsequently provide service to these residences as GWA customers. The Navy and GWA currently have disparate rate structures with the Navy rate structure being greater than that of GWA. Therefore this provision of service is done at a net financial loss to GWA. GWA is able to do this because the number of customers is relatively small. However, should DOD pursue a primarily inside-out approach to this effort, there will likely be a need created requiring GWA to purchase significantly more water from the Navy in order to meet customer demand. This could have a significant financial impact on GWA. The EIS/OEIS should evaluate development options to completely avoid this scenario or evaluate mitigation measures such as rate structure parity with GWA that would mitigate the impacts.

Water System Impacts and Options

- Option of Leak Repair as an Alternative to New Source Development: The development of new water sources (wells) is being considered as an option to meet water demands. The potential impact of additional pumping on the sole source aquifer is not clearly understood. There are high water losses in both the Navy and GWA water distribution system. The GWA WRMP projects that future demands can be satisfied by recapture of water losses without having to develop new sources. Coordinated leak repair and/or line replacement in both GWA and Navy systems should be considered as source option to meet future demands of both entities.
 - Strategic Coordination and Integration of Distribution Systems: GWA believes that the GWA and the military should develop a long term vision and roadmap for the full coordination and integration of water distribution systems on the island. It is understood that the implementation of the vision may take place over a long period of time in order to address DOD concerns about the reliability and sustainability of existing GWA facilities. All projects implemented as part of this DOD action should be defined and developed to be consistent with a common long term vision.
 - Option of Extension of GWA System as Andersen Backup: Andersen Air Force Base has insufficient water supply to support the proposed USMC presence. Interconnection with the GWA system to supplement existing systems and to provide backup should be considered as an option to the proposal to extend the Navy system to the area.
 - Option of Extension and/or Expansion of GWA Distribution System to Support North/South Finegayan: North and South Finegayan have inadequate supply and storage. Interconnection to the GWA system and the provision of common storage facilities should be considered as an option to the development of new independent system.
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- Option of Coordinated Groundwater Under Direct Influence (GWUDI): Both the Navy, the Air Force and GWA are facing significant costs to install new treatment facilities should the Northern Aquifer be declared to be GWUDI. Coordinated efforts to address the treatment requirements could reduce the financial impact to all parties due to economies of scale. Options to mutually address GWUDI issues should be considered.
- Impact of Population on Existing Pumping, Distribution, and Storage Facilities: As previously noted, even if all military personnel are housed and served within base confines, significant civilian personnel will be required who will not be housed on base. Numerous GWA distribution lines and booster pump stations and storage facilities have been identified as needing upgrade due to future WRMP growth projections. Increases in these projections will mean inadequate funding for the infrastructure growth, leading to reduced water pressure and inadequate fire flows, which are both a high cost to ratepayers and a serious safety hazard.
- Coordination of Utilities with Defense Access Roads (DPW LRP-B20): GWA is working to reduce dependency on Navy water for customers in Agat and Santa Rita. Successful reduction of the dependency will create excess capacity for the Navy that could be used elsewhere without having to develop new sources. One barrier to reduced dependency in Agat and Santa Rita is limited ability to move water from the North. It is understood that a defense access road between naval magazine and Anderson Air Force Base is being considered as part of the overall scope. Installation of water transmission lines under portions of the proposed road could reduce GWA dependency on Navy water and should be considered as a "source" option.

Wastewater System Impacts

- Increased Environmental Impact of Multiple Wastewater Treatment Plants (WWTP): Duplicate wastewater systems will multiply environmental risk. For example, GWA is installing a new deep ocean outfall at their Northern District Wastewater Treatment Plant. This outfall has been designed to allow for future growth, and will discharge the treated effluent from a plant that currently treats sewage from both NCS Finegayan and AAFB. A duplicate plant and outfall would double the environmental impacts, quadruple project costs for the military, and is clearly contrary to DOD policy.
 - Option of Combined GWA/Navy Agat WWTP: The Navy has already identified a probable future need for additional treatment facilities for its southern bases (Apra Harbor, Naval Magazine and Polaris Point). As long ago as 1992 a feasibility study was done that identified the potential for a shared sewage treatment plant located at GWA's Tipalao property (located across from Camp Covington). GWA will be building a new secondary wastewater treatment facility on this property with or without the addition of DOD flows. The WRMP identifies this project as a 2012 need. GWA's Agat WWTP (which will be replaced by the new Tipalao facility) and
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the Navy's Apra Harbor WWTP already share a deep ocean outfall. Increasing the designed capacity of the new plant to accommodate Navy flows would be far less costly and have far fewer overall environmental impacts than building two new plants in the same area.

- o Option of Expanded Northern District WWTP: GWA currently treats all wastewater from AAFB and NCS at this plant. GWA did not anticipate expanding this plant (based on WRPM projections) until 2015. Pushing up this deadline and combining efforts with DOD for a plant expansion could be cost effective for both systems. The advantages of a single outfall are noted above. Additional advantages include already existing collection systems.
 - Evaluation of Anderson Air Force Base Wastewater Characteristics: GWA has never characterized any of the wastewater discharges from any of the military facilities. The build-up and expanding industrial activities can be an opportunity for GWA and DOD to coordinate on potential pretreatment requirements. A treatment system included as a part of a Northern District upgrade could conceivably be far more cost effective to install than building a new treatment or pretreatment facility would be.
 - Impact of Population on Collection and Pumping Facilities: As previously noted, even if all military personnel are housed and served within base confines, significant civilian personnel will be required who will not be housed on base. Several GWA sewer lines and pump stations have been identified as needing upgrade due to future WRMP growth projections. Increases in these projections will mean inadequate funding for the infrastructure growth, leading to sewer backups and overflows that are both a high cost to ratepayers and a serious environmental and health hazard. Additionally, both GWA and DOD existing sewer lines are currently significantly deteriorated; a joint inspection and repair program potentially using in situ repair techniques currently not available on-island would be extremely beneficial to both.
 - Impact on Aquifer Due to Growth in Unsewered Areas: The WRMP identified significant unsewered areas in the Northern Aquifer watershed. Many of these areas are adjacent to the military bases. Growth in this area due to an increase in various off-base and support personnel could have a considerable negative impact on the aquifer from which both military and GWA wells draw.
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GUAM POWER AUTHORITY

Infrastructure, Ports:

- In considering the benefits of fuel diversification, one alternative is coal-fired generation. Delivery of coal supplies to such plant would require new dock facilities to accommodate shipping and transportation from the dock to the coal storage facilities. Consider the need to reserve space for any future potential coal shipment handling facility.

Infrastructure, Energy:

Generation Expansion and Fuel Issues

- Conduct an economic forecast to support relocation
 - Provide any additional information to improve GPA's models or to concur with GPA's current outlook
 - Prepare load demand and energy requirements for the transfer and buildup period.
 - Compare these requirements with GPA's assumptions used in GPA's Integrated Resource plan
 - Compare GPA's generation planning criteria of one day in four and a half years LOLP against DOD's requirement
 - Determine the added cost for the more stringent planning requirements
 - Investigate alternative fuels to mitigate rising diesel fuel (petroleum) costs
 - Identify the premiums to place on fuel diversification
 - Determine the DOD funding level for fuel diversification or renewable energy
 - Determine if GPA's fuel reserve policies are sufficient for the DON/DOD mission requirements (GPA's fuel inventory policy is to maintain a reserve of Residual Fuel Oil between 30 and 60 days)
 - Determine the fuel reserve requirements DON/DOD expects GPA to maintain for normal and critical operations
 - Determine DON/DOD funding required to expedite/accelerate existing equipment modifications/upgrades for any additional infrastructure (bulk storage) to support new fuel types and increased reserves?
 - Determine DON/DOD funding required for construction of additional storage tanks to meet DOD/DON requirements
 - Determine DON/DOD funding required for the additional fuel inventory required.
 - Explore various business models under which GPA purchases bunker fuel to meet inventory requirements to support DON/DOD.
 - Consider whether there are benefits to DON/DOD participation in GPA's residual fuel oil hedging program
 - Investigate the benefit of DON/DOD having the Authority purchase a fuel swap or other hedge instrument not currently authorized by the Guam Public Utilities Commission
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- Investigate whether DON/DOD desires arranging for an annual fixed price for fuel
- Review the single berthing & pipeline for tanker discharge condition and investigate the feasibility of additional berthing or pipelines for the purposes of increasing security and hedging against system unavailability...investigate economics and benefits of DON/DOD funding this additional infrastructure
- The Japan base relocation is a fast track project which may require improvement to existing infrastructures. Determine and articulate DON/DOD's commitment to ensure that the local community is not impacted with the move if GPA is not able to complete infrastructure improvement by the anticipated relocation. This could be due to funding issues, delays due to restoration after a typhoon or other catastrophic events, etc.

Separation from IWPS Grid Issues

- Assuming there are planning scenarios that include separation of the DOD power system from the island wide power system:
- Determine the rate impact on the civilian community and the impact of stranded assets recovery on the civilian community
- Determine the extent of separation from the GPA grid impact:
 - Transmission assets that are to be conveyed under the CSA
 - Tie-in to the grid
- Investigate any federal laws or requirements that prevent any adverse affects or impact on the community

Power System Issues

- Review the DON/DOD position and requirements for under frequency load shedding (UFLS), to include funding to mitigate the requirement, for the following:
 - Upgrade to Generator Governor Controls
 - Improvements to system protection and SCADA communications
 - Automatic transfers to existing backup generation
 - Special tariffs for exclusion from the UFLS.
- Investigate the following related to reliability and power quality concerns that have surfaced regarding GPA electric service
 - Power quality
 - Outage frequency and durations
 - Equipment obsolescence
 - System upgrades
 - Funding Source for c. and d. above
 - Rate Impact/mitigation

Backup Generation Issues

- DON/DOD has openly discussed options for construction of power generating facilities within the base parameters. GPA is confident that it can support DOD.
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Determine DON/DOD's requirements for GPA that will keep it a customer of GPA.
Determine and provide DON/DOD requirements for:

- Planning and operations criteria
- Performance monitoring and reporting
- Criticality of loads
- Backup generation
- Power Quality.

DON/DOD Procurement Related Issues

- It has been brought to our attention that DON/DOD will create a Special Process Entity (SPC) or a core group to handle all procurement and contracts to support the Japan base relocation. There is concern that GPA will be excluded from discussions that may ultimately require GPA support to maintain or operate power utility facilities.
 - Determine how GPA can be allowed to compete within the SPC/SPE process.
 - Describe the alternatives to this SPC/SPE.

Conditions of War

- Determine any special/requirements during times of war or high security alerts in relation to the IWPS including:
 - Personnel
 - Assets
 - Vehicles
 - Access Restrictions (Tanguission Fuel Line, 115kv Maintenance Roads, WSD generators at GWA pump stations, etc)

Upcoming Studies & Projects

- Articulate what studies DON/DOD will conduct to determine impacts of the Japan base relocation. (e.g. Transmission planning, Cost of service, Generation expansion)
- Determine how GPA can actively participate in these planning studies.

Infrastructure, Water/Wastewater:

- The Cabras-Piti Complex contains the bulk of GPA baseload generation. This area gets its water from DON.
 - a. Investigate any impacts to current and future requirements for water supply to the Cabras-Piti Complex.
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PORT AUTHORITY OF GUAM

Historically, the Port Authority of Guam (PAG) has been the venue through which military goods and equipment are off loaded. However, even before the actual relocation of equipment, military personnel and dependents, there will be an increase in cargo and personnel associated with the infrastructure build up to precede the actual relocation. This will have a more immediate impact on the capacity and operation of both our island's air and sea ports.

Furthermore, after the initial construction phase is completed, there will be an increase from the present flow on the number of military passengers and cargo (household items, POVs, commissary items, etc.) With that, we would like to see included in the EIS:

- An examination of the Port Authority of Guam's present Infrastructure. Provide projections for future infrastructure requirements in the areas of oil storage, water, sewer, electrical, data and communications systems, wharf waterfront expansion, warehousing and/or container yard expansion to accommodate realistic and expected future expansion.
 - An analysis of how the Department of Defense (DoD) will identify and address short term requirements, as well as to enable our ports to be in a position to provide for its sustained long term needs to include funding needs and potential funding sources.
 - A detailed analysis of the impacts of the Transient US Navy Nuclear Aircraft Carrier (CVN) at Naval Base Guam, ordinance handling operations at areas within the inner and outer harbor, particularly how it would affect or extend the Explosive Safety Quantity Distance (ESQD) arc and restrictions on operations on the civilian and recreational areas of the outer harbor.
 - Impact on Harbor Traffic – With the increase in traffic at the military side of the harbor, PAG operations may be affected. Although few, there have been instances in the past when the arrival of military vessels is kept confidential and only made known to the community when it is at the mouth of the Harbor.
 - Impact on current tugs and pilot services – Will the current resources accommodate both the military and commercial sides of the harbor? If a military vessel arrives, will the commercial vessel be expected to wait for the return of the tug and pilot?
 - Examination of the impact the anticipated increases in vessel activity, in both Inner and Outer Apra Harbor would have on future requirements/adequacies of navigational aids for the harbor waters under the Port's jurisdiction.
 - Mitigation plans for oil spills caused by Military activities.
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- Environmental impact potential for proposed dredging and construction activities at Apra Harbor related to Kilo Wharf.
- Environmental impact and containment plans in the event of a nuclear accident resulting from the Nuclear Vessels operating at Kilo Wharf, i.e. Nuclear carriers.
- With the USMC to be berthed on Guam but transiting primarily by sea to conduct training and, if necessary, to engage in combat, will the commercial port of Guam be designated a Seaport of Embarkation/Debarcation for military outload operations? If so, how will this increase in military operations impact the safety and security risks to the island's only commercial port? How will necessary upgrades to the commercial port's security be implemented/funded? How will the additional maritime safety and security requirements associated with military outload operations be accommodated by U.S. Coast Guard Sector Guam?
- The potential of invasive species, to include Brown Tree Snakes on other areas of the Pacific. The probability of these invasive species entering or leaving Guam on a military aircraft or container vessel will rise proportionately with the increase in air traffic and movement of personnel and cargo to and from Guam.
- The Port Authority of Guam is also mandated to provide support for recreational activities such as the small boats marinas and other community support functions. What impacts will be felt by the civilian community in providing this support for our military users?

The Port is presently obtaining consultant services to update the Port Authority of Guam Master Plan. It is strongly recommended that environmental documentation determining the impact of the proposed military relocation, and other anticipated major DOD developments, on the Port's infrastructure be compiled in conjunction with the preparation of the PAG Master Plan update. Also, given that the Port will be the first major infrastructural component in the local community to experience the impacts of the growth, we request that this coordination receive priority scheduling in the EIS process.

A.B. WON PAT GUAM INTERNATIONAL AIRPORT AUTHORITY (GIAA)

I. Background

The 2006 agreement between the United States and Japan to shift approximately 8,000 military personnel and their dependents from Japan to Guam is reflective of the island's strategic importance to the Department of Defense's (DoD) overall military posture. Given the island's geographical location in close proximity to major Asian countries provides the DoD with the opportunity to position forces on a permanent and rotational basis. The pre-positioning of military assets on Guam will help decrease DoD's response time to a crisis or contingency in the region.

In light of the above, the projected military build-up presents Guam with a unique opportunity to work closely with DoD agencies to identify areas of interest, issues or concerns and produce an Environmental Impact/Overseas Environmental Impact Statement to assess and address these items in its final report.

II. Overview – A.B. Won Pat International Airport Authority, Guam (GIAA)

The A.B. Won Pat International Airport Authority, Guam (GIAA) is the caretaker's of Guam's only commercial airport, the lifeline to the island's tourism-driven economy. An autonomous instrumentality of the Government of Guam, GIAA is licensed and certified by the Federal Aviation Administration (FAA) as the airport operator for island. An essential facility and service provider for the island of Guam, GIAA provides services to major international and regional airlines serving 22 destinations and employment opportunities for over 6,000 Guam residents.

Situated atop a bluff located in the middle of the island, the Won Pat Guam International Airport occupies approximately 1,622 acres of property that was formerly known as the U.S. Naval Air Station, Agana (NAS). A former Joint Use Airport, NAS was converted to a civilian operated airport in April 1995. In September 2000, GIAA received the deed from the federal government that conveyed the airfield, runways, taxiways and other properties designated for airport purposes. Designated by the FAA as a "Small Hub" Airport, annual passenger activity exceeds 3 million per year. The following is an overview of GIAA's properties and facilities:

1. Terminal Facilities
 - a. 767,553 square feet with over 76 ticket counter positions
 - b. 48 immigration and 42 customer inspection stations
 2. Gates
 - a. 21 aircraft parking positions
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- b. 18 common use terminal gates
- 3. Runways
 - a. Runway 6L/24R – 10,000 feet (plans underway for extension to 12,000 feet)
 - b. Runway 6R/24L – 10,000 feet
- 4. Taxiways – plans are underway for the completion of a 12,000 feet parallel taxiway anticipated to be completed EOY 2008
- 5. Cargo Facilities
 - a. 43,990 square feet air cargo warehouse
 - b. 11,527 square feet of office space, consolidated shipping and express mail services
- 6. Other facilities and Areas
 - a. 24 Acres located on the North East part of the Airport
 - b. 86 Acres of former military housing units
 - c. 100 Acres of property to include aircraft hangars, ground support equipment maintenance facilities, storage facilities, warehouses, and barracks facilities

III. Current and Planned Improvements

GIAA has invested over \$500 million in Guam's commercial airport and is expected to complete or commence 59 projects worth over \$150 million over the next 18-24 months (please see the attached project listing). Many of the capital improvement projects are focused on infrastructure maintenance and development such as the runways extensions, taxiway construction, pavement strengthening, utilities projects, and integrated cargo facility; property development to create diversified revenue streams; and terminal upgrades to improve passenger facilitation and enhance the overall traveling experience. Many of these projects are driven by the projected forecast and growth of commercial aviation activities.

IV. Scoping Concerns for GIAA

In light of the projected military build-up, the following are areas of interest or concerns that GIAA would like to see addressed in the EIS/OEIS to be prepared by the DoD:

- 1. Projected Growth in passenger, cargo and aircraft traffic.

GIAA's projected forecasts were conducted in 2005 and earlier. While military traffic was taken into consideration, the figures used were based on the current military profile of the island at that point in time and did not reflect Guam's increased military posture for 2008 and beyond.

2. Impact on current and planned airport projects given the projected growth outlined in Item #1.

GIAA's capital improvement program is focused on infrastructure development and maintenance, property development and revenue diversification, and terminal upgrades to improve passenger facilitation and overall enhancement of the traveling experience. These projects are driven by the projected forecast and growth of commercial aviation activities.

3. Impact on additional infrastructure requirements for airfield, terminal, cargo facilities, road access, traffic pattern and circulation, and utilities infrastructure to ensure compatibility with current and future military aircraft operations or personnel movements.

GIAA's capital improvement program is based on the needs of the commercial aviation industry now and through the year 2025. Moreover, GIAA is limited in the expansion of its airfield infrastructure. Additional infrastructure requirements that are not identified in GIAA's current CIP program or planning horizon may have an impact the surrounding communities.

4. Impact on existing environmental mitigation programs.

GIAA has several environmental mitigation programs underway and the environmental baselines were based on current commercial aircraft activity with minimal military traffic. The following are GIAA's existing environmental programs.

- a. Noise Compatibility Program – the level of activity and type of aircraft deploy may affect our existing noise contours that were approved in 2004 by the FAA as part of GIAA's existing Noise Compatibility Program.
- b. Hazardous Spill Prevention Control and Countermeasures – what type of material and supplies would military aircraft contain and what controls or measures are in place to mitigate contamination or spills.
- c. Military Fuel Lines and Easement Boundaries – there are portions of the military fuel line that are located on airport property. What are DoD's mitigation and remediation action plans in the event of a spill or leak from these fuel lines?
- d. EPA Compliance Requirements – How will DoD address the federal EPA mandates with regards to conduct aircraft operations at the Guam International Airport?

5. Implementation and Funding Sources for additional infrastructure requirements

- a. Develop logical implementation schedule – work closely with GIAA to incorporate infrastructure development plans in accordance with GIAA's ongoing capital improvement program
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- b. Identify funding sources – GIAA's capital improvement program is 90% funded by the FAA. In addition, GIAA is a designated Military Airports Program grant recipient and is also eligible to receive grants from other federal agencies such as the Federal Highway Administration and the Economic Development Agency.

ENVIRONMENTAL IMPACTS

Guam Environmental Protection Agency

The Guam Environmental Protection Agency (Guam EPA) recognizes the need for repositioning of Department of Defense (DOD) forces in Guam and provision of infrastructure to support the increased needs of the DOD. In response to the Notice of Intent by the Department of the Navy to produce an Environmental Impact Statement/Overseas Environmental Impact Statement (EIS/OEIS) on the impacts of 1) proposed relocation of 8,000 Marines from Okinawa to Guam, 2) facilities for berthing of nuclear aircraft carriers at Guam and 3) placement of an Army Ballistic Missile Defense Group on Guam, the Guam EPA provides the following comments. We request that these be included in scoping input to the development of the Draft and the Final EIS.

Why an "Overseas EIS"?

Previous DOD EIS's for Military Training in the Marianas (1998) and for Relocation of Navy Activities to Guam from the Philippines (1993) were not OEIS's. What are the proposed actions and impacts that are to be "beyond 12 miles " from US shores that are said to trigger the need of an OEIS? Will application of the OEIS lessen the concerns and responsibilities of DOD that would otherwise be addressed in an EIS? Will impacts to the environment of the Commonwealth of the Northern Marianas be addressed equally as those to Guam's environment?

National Defense Concerns Versus NEPA:

What circumstances relative to National Defense would override, modify or cancel the NEPA requirements applied to these proposed actions and the development of the EIS/OEIS?

Cooperating Agencies:

How much will each Cooperating Agency contribute in resources, manpower and funds to this NEPA EIS/OEIS effort?

Infrastructure, Wastewater:

Wastewater collection and disposal systems must comply with Guam EPA Wastewater Regulations. The projected increase in numbers of DOD personnel and families precludes the use of individual wastewater disposal systems. As is implemented elsewhere on DOD properties on Guam, connection to the public sewer system is needed. Partnership of DOD with the Guam Waterworks Authority (GWA) on comprehensive upgrades of total facilities should be part of the DOD expansion. The DEIS must propose and evaluate alternatives that may best serve both the civilian and the military

communities on Guam through a comprehensive island-wide approach with GWA. The recent GWA Master Plan was developed to cover the period of the planned military expansion but was done before the information on increased military expansion was available. The EIS/OEIS process should revise the GWA Master Plan to include new military impacts.

If a more comprehensive wastewater collection system for all new or expanded DOD activities in northern Guam cannot be completed in time for planned expansion, the DEIS/OEIS should address this. In such an event, a temporary arrangement of special wastewater treatment facilities, that have effluent of drinking water quality discharged on the site, may be considered, if this can be built and operated to Guam EPA approval, with no impact on the aquifer below. DOD must coordinate with the local Guam Waterworks Authority on the total projected amount of wastewater from the DOD properties that will be treated at the Northern Sewage Treatment Plant. Under the necessary comprehensive approach to all DOD increased activities, extension of sewer facilities to new residential and other areas is needed. Also, plans must be approved to share in the up-grade and maintenance costs of sewer distribution and treatment once the existing DOD Wastewater MOU expires in 2010.

Alternative solutions to treating and disposing of the increase of wastewater from the planned DOD developments need to be addressed. The GWA Northern Wastewater Treatment Plant (WWTP) is out of compliance with its National Pollutant Discharge Elimination System (NPDES) permit from EPA. GWA is trying to make improvements to meet requirements under a Federal Stipulated Court Order. GWA may need to upgrade this WWTP to secondary treatment if Clean Water Act Section 301(h) requirements and water quality standards cannot be met. If the GWA improvements can be supported in the form of mitigation from the DOD impacts, the necessity and cost of secondary treatment may be avoided, through EPA's agreeing to continue GWA's waiver from secondary wastewater treatment requirements under Section 301(h) of the Clean Water Act.

Infrastructure, Drinking Water:

Plan review for expansion of the drinking water systems to service all DOD facilities will be required by US EPA and Guam EPA. Regardless of their owners and operators, the water distribution systems, including water storage tanks and water line connections must be inspected for compliance to meet Guam and U.S. Safe Drinking Water Standards. Existing capacities, projected needs and recommended approaches to meet those needs should be considered. The impacts of using alternative sources of drinking water should be assessed. These alternatives should consider surface water, ground water, recycled water, desalination and various treatments needed for future water sources and combinations of these sources. Partnership of DOD with GWA on comprehensive upgrades of total water facilities should be part of the DOD expansion. Impacts on Guam's population of such cooperative development of infrastructure versus separate DOD developed and operated systems must be addressed.

The EIS/OEIS process shall address the cumulative impact of the military build-up on the 2006 Guam Water Resource Master Plan to include the DOD's proposed future developments and evaluate alternatives that may best serve both the civilian and the military communities on Guam through a comprehensive island-wide approach with GWA. Accelerated replacement of leaking GWA and DOD water lines and development of new planned storage reservoirs should be emphasized to recover and store the lost water in lieu of developing new water sources. Such alternatives must be considered as well as water conservation and recycling.

Groundwater:

A series of assessments on ground water must be carried out as part of the EIS/OEIS. Cumulative impacts of military expansion and relocation on the US EPA recognized sole source aquifer of Guam need to be addressed. Increased pumping from the aquifer for all DOD uses shall be assessed relative to its corresponding sub-basin's sustainable yield. Because of pollution risks to currently utilized ground water resources, the issue of ground water under the direct influence of surface waters (GWUDI) must be assessed and its impact on cost and availability of water to serve the increased needs of expanded population and developments must be evaluated.

Extension of sewer facilities to unsewered developments off federal lands done in a coordinated comprehensive approach with GWA to protect the Guam Northern Aquifer while developing expanded sewer facilities for military customers must be considered.

The impact of existing TCE and PCE pollution on production of well water for expanded military needs and the alternatives for removing this pollution as part of the drinking water source development must be considered. The closing of the Tumon-Maui Tunnel and the closing of the Air Force air stripping facility in Dededo for well water should be reconsidered among alternatives for water production. Replacement of the air stripping facility with a granulated active carbon filter system as used at Guam International Airport for former Naval Air Station contamination clean-up, at two of GWA's water wells and two privately owned water wells, which have been quite successful in the removal of contaminants, should be considered.

Storm Water Management:

The Guam EPA requires that all storm water disposal, up to the 20-year, 24-hour storm event, be contained on-site of the proposed facilities. Permits for and upgrades to stormwater management systems will be required to accommodate the large expected increases to the flows and decreases to quality of the storm water, whether discharged to the ground or to surface waters.. New expansion construction and upgrades to air strips, wharves, roads, parking areas or other impervious surfaces should have management controls consistent with the Government of Guam's legally applied Stormwater

Management practices and this must be recognized as part of the mitigation under the EIS/OEIS. Special attention to the Federal Sole Source Aquifer designation of the aquifer under Northern Guam must be included in the DEIA/OEIA. Impacts of deviation by the DOD from practices enforced by Guam EPA for stormwater management, as applied on all non-DOD properties on Guam, must be addressed.

Erosion Control:

All proposed activities involving clearing and grading should comply with best management practices applied throughout Guam. Agency permit fees shall be paid where applicable. Environmental Protection Plans (EPP) are required for clearing and grading activities. Stormwater best management practices and erosion control measures shall be implemented for construction and post-construction phases. Vegetative waste should be composted, mulched and diverted from the waste stream going to the landfill. Prior to the commencement of earthmoving activities, local government clearances from the Guam EPA (e.g., for water quality impacts) Department of Agriculture (for wildlife and endangered species), Department of Parks and Recreation's Historic Preservation Office (for historical and archeological concerns) must also be obtained.

Quarries:

Expanded demand for quarry materials for military construction and off-base construction triggered by the military developments must be assessed and matched to existing and new quarry sites. Impacts of the uses of the quarries and selection of sites and methods that are least damaging to the environment, and to human and natural resources should be assessed and developed into a comprehensive quarry development plan for Guam. The EIS must propose and evaluate alternative quarry materials sources that may best serve both the civilian and the military communities on Guam through a comprehensive island-wide partnership (shared development).

Production of limestone sand from quarries for all uses of sand should be required, rather than use of submarine and beach sources of sand.

Radon Abatement:

Guam EPA encourages that all new proposed dwellings, dormitories, barracks, classrooms and offices in northern Guam be designed as Radon Resistant New Construction Buildings, since they will be built over limestone topography known to emit unsafe levels of radon gas. Impacts of not doing so should be addressed in the EIS.

Air Pollution:

Impacts of emissions due to potential increase of demands from existing power suppliers or the construction of new power sources, including back-up power sources and waste to

energy production, need to be assessed and related to compliance at all potential Guam sites. Impacts of increased vehicle and vessel emissions on Guam air quality should be addressed.

Solid Waste and Construction and Demolition(C&D) Debris:

The AAFB has been successful in reducing and diverting waste, especially green waste, from landfills. Similar and improved new methods to reduce and recycle solid waste should be addressed in the DEIS/OEIS and impacts on landfill requirements noted. Partnership possibilities with private and Government of Guam recyclers should be considered. Assessment and recommendations should be made on limiting landfills to a single, privately operated one for all of Guam, regulated by an autonomous authority. The change to the lifetime of this already planned landfill due to increased waste from the expanded population due to military build-up must be calculated in the EIS. Temporary alternatives on military property should not be proposed without assessment of their impacts on development of the proposed single landfill for all of Guam. The impact of the transportation of increased solid waste to the new landfill facility should also be addressed.

C&D debris from DOD activities should be recycled as much as possible. Capacity to recycle old concrete from demolition sites exists on Guam. If the hardfill material resulting from demolition in DOD projects is to be disposed of off-Base, the current inventory of Guam EPA permitted hardfill sites must be evaluated in the DEIS/OEIS to see if they can accommodate the quantity of hardfill to be generated. If there is not assured capacity, alternatives must be proposed. Alternatives that may best serve both the civilian and the military communities on Guam through a comprehensive island-wide partnership (shared development) for hardfill management should be evaluated.

A recycling program encompassing all federal and non-federal activities on Guam should be considered, to include aluminum cans, cardboard, paper, plastics, glass, metals, wood and green waste. Separation and private curb-side collection for recycling of these materials needs to begin very soon and this should be promoted through a joint Military and Government of Guam approach. Impacts of not doing so should be assessed.

A deposit on all white goods, TV's and other appliances, aluminum cans, plastic bottles, and glass needs to be initiated Island-wide, with full commitment of the DOD, to promote recycling.. Or else an alternative means of funding the collection and recycling of these items should be recommended, as is done on Saipan.

Hazardous Waste and Installation Restoration Sites:

Management practices and impacts of hazardous waste, inclusive of waste propellants, explosives, pyrotechnics, used oil; etc. must be addressed. Potential hazardous wastes from construction, demolition, training, restoration and support services must be included. DOD should have generic contingency plans that should outline procedures that DOD will

adhere to in the event that they find adverse environmental conditions during the buildup, this may include but not limited to buried or submerged drums/containers, contaminated soil/water, UXOs, as well as experienced "spotters" that can identify these situations.

Installation Restoration sites such as the Military Munitions Response sites, and the "over-the-cliff" dumping onto Urunao private properties and other clean-ups need to be incorporated in assessing of best alternative development sites. Unexploded ordinance from WWII and other widespread and often unrecorded military contaminants are in jungle areas, submerged lands and currently undeveloped military sites. This can impact site selection and costs of new developments. Known IR sites and timelines for cleanup actions need to be considered in the DEIS/OEIS review of alternative development sites.

Toxic or Environmentally Harmful Chemicals:

Impacts from increases in imports or in generation or storage of toxic chemicals or chemicals that may harm the environment must be addressed.

Pesticides Use:

Impacts of the use of insecticides, fungicides, rodenticides, and microbicides in DOD operations, construction, renovation and maintenance should be addressed. A Pesticides Use Plan should be required for all DOD activities.

Explosives Hazards:

Land use and water use impacts and potential natural resources impacts, especially to native species, from military explosives must be addressed.

Firearms Training Impacts:

For planned location of firearm training areas, the EIS must look into the impact of the noise that may disturb the normal activities of native species as well as human uses of land and waters. Besides land and water uses impacts, impacts to the environment from bullets, shell casings and firearms use residuals must be addressed in the EIS. The impacts of bullets on the marine environment should be assessed over the life of a shooting range. Clean-up of these training wastes must be planned and therefore shooting out to sea can not be acceptable. If an alternative includes shooting over the marine environment, the methods and costs of removal of bullets from the coral reefs protected by US Executive Order must be addressed.

Beach Landing Training Impacts:

Amphibious landing exercises will have impacts on coral reef conservation, beach and coastal area erosion, and migratory shorebird feeding, and can conflict with other uses of

natural resources and land and water areas. These issues all need to be addressed and impacts of all classes of proposed craft in all possible use areas must be separately addressed.

Electromagnetic Radiation Impacts:

Any possible or perceived impacts from electromagnetic radiation related to military activities and possible health and land use impacts must be addressed.

Nuclear Radiation Impacts:

Any possible or perceived impacts from nuclear radiation related to military activities and possible health and land and water use impacts must be addressed.

The current level of radioactivity in Apra Harbor (water and submerged lands adjacent to Polaris Point or the Inner Harbor) and the sources of this radioactivity must be assessed. What types of radioactive monitoring or surveying are done on military installations and at Guam sites external to the bases? What are the types of samples, periodicity of sampling, the isotopes and radiation of concern, and locations of sampling? What monitoring processes are employed? What is the turnaround time for results? What federal and Guam agencies receive these monitoring results?

Will there be a cumulative increase in background radiation levels due to the additional nuclear vessel activities in the Harbor or at the other proposed sites?

Native Species Habitats:

Significant cooperative activities among the DOD, and U.S. and Government of Guam agencies concerned with endangered species and native species conservation have progressed over many years. Habitat areas on DOD property have been used for cooperative conservation projects. The DEIS/OEIS must note impacts to listed species and address protection of their habitats, including providing improved studies and re-evaluation of their habitats near DOD development sites. The EIS must propose and evaluate natural resource conservation alternatives that may best serve both the civilian and the military communities on Guam through a comprehensive island-wide partnership. Management through accepted ecosystem approaches should be described.

Special attention must be given to native Guam tree snails which have been inadequately addressed in previous impact studies. All native tree snails have been badly impacted by human activities, especially removal of vegetation and introduction of alien species. Three of these species are listed as endangered on Guam. For example, the Draft EA for the proposed Beddown of Training and Support Initiatives at Northwest Field, listed tree snails as "not present ". But one species was recently rediscovered by the Director of the University of Guam Marine Laboratory while performing a study for the Air Force at

Northwest Field. This species had not been seen anywhere since its original discovery before its scientific description in 1898 (Reference: Barry D. Smith, 2000, Land Snail Survey of Proposed Cargo Drop Zone at Northwest Field, Andersen Air force Base, Guam).

Loss of vegetation serving as habitat and food sources for endangered tree snails, birds and bats and impacts on native species from all new developments and from DOD related population growth needs attention in the DEIS/OEIS. Information on impacts to Guam species and alternatives and activities to mitigate impacts on these species should be addressed. We believe that a comprehensive mitigation plan is needed in regards to overall impacts on living plants and animals from all the proposed DOD activities. This should include recommendations on mitigation banking possibilities for future impacts.

Cumulative impacts to health of ecosystems, including coral reefs, must be addressed.

Also, improved management of impacts from introduced species and procedures to prevent new introductions on land and in fresh and marine waters should be addressed

Apra Harbor Resources:

Impacts of the creation of wharf facilities to berth the CVN, as well as other expanded needs of the Navy, the Marines and the Coast Guard in Apra Harbor will seriously impact the many existing and potential uses of Apra Harbor. Outer Apra Harbor is one of the cleanest harbors in the world, with its clear waters and numerous coral, fish and invertebrate species. Because of the many existing uses occurring in Outer Apra Harbor, a comprehensive conceptual plan for all uses, including the planned new military uses, should be prepared as part of the EIS and its implementation by all users promoted. A partnership approach to such planning among Government of Guam, Federal resource agencies and the DOD will best serve both the civilian and the military communities on Guam and the National interest.

Alternatives to destroying the coral reef shoals in Apra Harbor must be developed and promoted in the EIS to allow a turning basin for the aircraft carriers that will visit Guam. These various shoals, including Western Shoals, Middle Shoals, Dry-Dock Shoals, Jade Shoals, Finger Reef, Sponge Reef and Hidden Reef are beautiful healthy coral areas with highly diverse fish and invertebrate species. These are areas that the tourist industry as well as the local population and military residents utilize for sport scuba diving, and snorkeling excursions. Protection of the shallower shoals from ship groundings and boat damage would be aided by better marking of the various shoals with proper buoys. Development of deeper artificial reefs in Apra Harbor would not mitigate damage to these shoals.

Increases in sea traffic and related restrictions or limitations on commercial and recreational water uses in Apra Harbor must be addressed.

Impacts beyond Inshore Waters:

If the Overseas EIS is being done because developments or changed uses are planned in areas beyond 12 miles from shore, these uses, their alternatives and their impacts should be described. No proposed activities in these waters have been named, but JGPO has said that the reason for an OEIS is because of some kind of activities and impacts will be beyond 12 miles.

Cumulative Impacts:

The Guam EPA has reviewed the scoping needs for the impacts expected from the actions noted in the NOI for the EIS/OEIS, as a separate group of impacts, not encompassing the significant interactive and cumulative impacts of related DOD proposed developments not only to current local conditions, but also to proposed or anticipated local development/growth. The overall cumulative impacts of additional projects and developments directly and indirectly caused by military expansion on Guam need to be addressed as thoroughly as possible in the DEIS/OEIS. For example, some of the many inter-related DOD activities that are ongoing and planned for development on Guam include the redevelopment of munition igloos at Andersen AFB, establishment of Global Hawk activities, the proposed Beddown of Training and Support Initiatives at Northwest Field, the expansion of Kilo Ammunition Wharf, the improvements to support nuclear submarines, the development of on-base schools, associated sports facilities directly related to school activities, library expansion, military education center expansion, facilities outside of the DoDEA school and higher education systems to provide collaborative opportunities and joint program planning for K-16 yet to be determined, barracks, housing and supermarkets, etc.

We request that the DEIS/OEIS include more than summary tables of the ongoing and expected projects. The cumulative and interactive impacts of each proposed project need to be addressed along with local future development/growth. Discussion should be provided on compatibility and interdependency of projects and ways to mitigate overall impacts. Comprehensive approaches to accommodate infrastructure needs and the lessening of any resulting negative impacts overall need to be addressed in light of all DOD activities.

The inclusion of impacts from transient DOD personnel and construction and service workers must be added to impacts of those based on Guam in all issues addressed in the EIS/OEIS.

Cumulative impact analyses should include not only direct impacts, but also impacts indirectly caused by military activities. Many indirect impacts due to the proposed build-up covered by this EIS/OEIS are already occurring, such as increased property sales,

production of barracks for construction workers, increased immigration or return of previous residents to Guam, etc. Statistics and projections on these changes and impacts must be generated for the EIS.

The logical reference point for measuring cumulative impacts must be established, such as environmental conditions at a certain point in time, e.g., 2006.

Mitigation:

Previous mitigation by the DOD on Guam and in the CNMI for environmental impacts has not been successful, such as the Navy mitigation for construction of Kilo Wharf. Much improved and permanent mitigation must be planned in this EIS/OEIS. We believe that a comprehensive mitigation plan is needed in regards to overall impacts on living plants and animals from all the proposed DOD activities on Guam. This could include recommendations on mitigation banking possibilities for future impacts. Impacts and mitigation for other islands should also be addressed.

The potential value of determining compensatory mitigation actions through the technique of Habitat Equivalency Analysis (HEA), as is being used for Kilo Wharf expansion mitigation, should be discussed and its application to all DOD projects impacts evaluated.

Mitigation for impacts to the human environment should consider provision of DOD lands for public uses such as recreation or a new public landfill and sharing of DOD resources such as those for mass transportation.

Impacts on Regulating Agencies:

We are particularly concerned over the anticipated impacts of increased military presence on Guam on the ability of Guam Environmental Protection Agency to provide the services which we are mandated to perform under US and Guam laws. The same concerns apply to other Government of Guam regulatory agencies.

Although plans, sites and detailed information on the relatively huge and sudden establishment of new facilities to be addressed in this EIS are not yet available, as well as information on other possible DOD projects and secondary impacts, these must be taken into consideration. Our estimates on anticipated impacts on Guam EPA services can only be general and preliminary at this time, and subject to revision as more information becomes available.

Wastewater: Whether the DOD develops its own or, as logically expected, uses Guam Waterworks Authority owned and operated wastewater collection and disposal systems, they must comply with Guam EPA Wastewater Regulations. A comprehensive wastewater collection system for all new or expanded DOD activities on Guam needs to be developed and coordinated with the GWA Master Plan, then approved by GEPA. DOD must

coordinate with the Guam Waterworks Authority and GEPA on the total projected amount of wastewater from the DOD properties that will be treated by GWA. Sewer connection permits, treated wastewater discharge permits and plans and designs for collection and treatment systems, all need Guam EPA engineers detailed reviews and approvals.

Drinking Water: Guam EPA will need added resources to review plans for expansion of the DOD drinking water systems and their meeting legal requirements, while not impacting resources necessary for non-DOD water users. The water distribution and treatment systems, including water storage tanks and water line connections must be inspected by Guam EPA for compliance to meet Guam and U.S. Safe Drinking Water Standards.

Clearing, Grading and Excavation: Most new DOD facilities will involve clearing and grading, which require Guam EPA permits following plans being reviewed by GEPA engineers. An Environmental Protection Plan (EPP) is also required for clearing and grading activities. If surface water may be impacted, a Water Quality Monitoring Plan must be filed with GEPA and approved for each project. Plans for best management practices applied to stormwater disposal and erosion control measures must be reviewed, approved, permitted, and then after construction, monitored by GEPA staff. New expansion, construction and upgrades to air strips, parking areas or other impervious surfaces should have management controls consistent with the Government of Guam's legally applied new Stormwater Management practices. Although the DOD does not apply for Guam Building Permits for construction on Federal properties, the private contractors working on DOD projects do apply for the various GEPA permits. Planned new developments over Guam's federally recognized Sole Drinking Water Source Aquifer will require increasing scrutiny by the already overworked GEPA staff.

Water Quality Certification: All US Clean Water Act Section 401 permitting is administered by Guam EPA. Related review of wetland permits and of Federal Consistency Approval under the Coastal Zone Management Act are also carried out. Projects from military expansion will increase workloads for all of these.

Solid Waste: GEPA must permit and regulate landfills that accommodate military expansion, and also must regulate other disposal activities and the expanded waste storage, recycling, waste separation, collection and transfer activities expected. GEPA plays a major role in having future military solid waste management be integrated with the public waste management system and having DOD utilize the new Guam Sanitary Landfill.

Significant amounts of Construction and Demolition(C&D) Debris are expected to be generated by upcoming military developments. This requires development and permitting of new hardfill sites.

Even the existing GEPA mandates for regulating and planning for these solid waste activities remain unfunded by the US and by Guam General funds. The added responsibilities for expanded military developments must result in added resources of

manpower, equipment and operational funds for GEPA to meet its mandates on solid waste management planning and regulation.

Hazardous Waste and Clean-Up Sites: Amounts of pesticides and hazardous materials linked to the military expansion will increase on Guam, needing additional Guam EPA resources for monitoring, permitting and enforcement.

Dozens of Installation Restoration (clean-up) sites of hazardous wastes on DOD properties (and overflowing from DOD properties, such as over the cliff at Urunao), as well as off-Base, Formerly Used Defense Sites (FUDS), are recognized. Many more on Guam may be found in the future as resources become available to identify them. These are being assessed and slowly restored to allow safe, but often restricted, uses of at least adjoining properties. GEPA through its DSMOA program plays a key part in promoting and overseeing such clean-up activities. Increased DOD developments will lead to pressure to increase and speed up the investigation and restoration of these hazardous waste sites and will increase generation of new hazardous waste to be managed. This will expand the already burdensome load on GEPA resources.

Air Quality: Permitting and monitoring of air quality related to increased releases of pollutants from military facilities, vehicles and equipment or private and Guam Government facilities, vehicles and equipment serving increased DOD demands, will increase the demands on already insufficient Guam EPA resources.

Off-Base Impacts: A very significant increase in off-base population would occur as a result of the importation of labor necessary for construction. Most of the laborers for DOD construction would have to be temporarily brought in to Guam.

Housing Facilities for Temporary Workers (Barracks) will cause many impacts involving land use and infrastructure permitting and planning by GEPA staff to mitigate and control. Likewise, related increases in traffic and government services for the imported workers will demand GEPA attention. The DOD may not assume primary responsibility for these impacts, making the work of GEPA even more difficult. The immediate increased demands on water, sewage and solid waste disposal from the influx of new workers will only aggravate the existing severe violations of environmental standards by the Government of Guam, as illustrated by the Federal Court ordered Consent Decree and Stipulated Orders.

New road construction has always been a regular burden on GEPA reviewers and permitting staff and this should greatly expand with urgent requirements for roads needed by the military.

The expected DOD construction both off and on Base will require massive amounts of quarried materials that will also lead to more review, permitting and inspection work by GEPA staff.

Wherever they are located, military developments, private and public developments triggered by the DOD expansion and even plans for expanded programs, will generate extensive EIA/EIS documents with strict timelines for review and comment. GEPA is already understaffed in manpower able to conduct these reviews and provide required formal comments.

Loss of Qualified Staff: Besides directly generating much more work for the GEPA staff, the urgent and well funded DOD development projects promise to lure more and more capable staff trained by GEPA to abandon the Agency for more lucrative positions in support of the military expansion. Several extremely important and experienced staff have already made this move in the last year. This is crippling the ability to fulfill GEPA mandates, while the demands and workloads are simultaneously greatly increasing. The EIS may address impacts on the permit processing resources and resulting delays in permit approvals and discuss the secondary impacts and costs resulting from these delays.

Infrastructure, Energy:

Partnership of DOD with GPA versus separate DOD developed and operated systems should be evaluated for impacts to the environment and to customers.

New alternative energy options to replace traditional sources of power should be evaluated, such as wind generation, cold seawater air-conditioning, ocean thermal energy conversion, methane from the Ordot Dump, waste-to-energy and solar power. These can prevent increased pollution that would be generated by expanded use of diesel, oil, solid waste or coal as fuel.

Military facilities should be designed for energy conservation and existing buildings should be modified to promote conservation.

Due to the many typhoons that Guam experiences, more reliable underground utilities need to be installed and the old system of power poles needs to be removed. In the past, after large storms have hit the Island, it has taken from 1 week to more than a month in some of the outlying areas for power to be restored. This is because of wind damage to power lines and equipment. Also, security of these utilities from other threats, such as vehicle accidents or terrorist and vandal actions would be served by relocating them underground. Current technology easily allows underground replacement of above ground lines. Costs and impacts of acceleration of this conversion, on and off DOD property, as related to the military build-up should be addressed.

Infrastructure, Traffic and New Roads:

With approximately 40,000 active duty personnel and dependents added to the island, what additional numbers of government and personal vehicles will be needed? What percentage will be importing their vehicles to Guam? What will be the impact to traffic? What will be the impact to Government of Guam Motor Vehicle Registration and licensing resources and services?

All Guam residents anticipate serious problems of increased road traffic accompanying the population changes tied to DOD expansion, and are concerned about development of new roads to link military operations. Much information and detail of alternative roads and their impacts must be covered in the EIS and Guam Highway Master Plans should be updated to coordinate with military road plans.

Potentials for bicycle use on and off base should be assessed and how to meet needs for safe bicycle paths throughout Guam should be considered.

Management of stormwater runoff must be incorporated in all plans and designs for new roads and road improvements. Where new roads are planned, impacts to wetlands and areas of environmental concern must be addressed.

Coordination with Government of Guam

All regulatory agencies of the Government of Guam will apply their permitting and regulatory responsibilities, as required by US National laws and Guam laws, to the activities undertaken by the DOD and its contractors to support relocation and expansion of the military on Guam. To avoid problems and delays in the progress of the support actions, regular dialog and communication among the DOD, its contractors and Guam agencies, including the Guam Bureau of Statistics and Plans, the Guam Environmental Protection Agency, the Guam Department of Agriculture and the Guam Department of Parks and Recreation should be held. The permits, approvals and consultations needed from Government of Guam Agencies as well as from other Federal Agencies should be noted as part of the draft EIS/OEIS.

Recreational Resources:

Impacts to Water Recreational Resources & Facilities: What numbers of additional active duty personnel and their dependents and military transients will be scuba diving, snorkeling, sailing, fishing, jet skiing, boating and competing with residents and tourists for dive, snorkel, fishing, and vessel use sites? This may be estimated from projections based on current Guam statistics on DOD associated divers and boat owners. Should the Recreational Water Use Master Plan and Recreational/Marine Preserve Permits limit the number of people at environmentally sensitive areas (like they do for Hanauma Bay in Hawaii) to minimize impact to those sites e.g., at Piti Bomb Holes Marine Preserve?

Increased impacts on marina facilities and moorings for boat will be impacted and should be assessed. The EIS also should estimate the impact of increased recreational and commercial fishing, due to population increases, to the local fish resources. Mitigation for these increased impacts must be detailed.

Increased use of public areas: Impacts must be assessed and mitigation planned for increased demands for off-base playgrounds, beaches, parks, picnic areas, sports facilities (soccer, football, baseball, softball, swimming, tennis, basketball, paintball, cock-fighting, volleyball, etc.), hunting areas, camping areas, off-roading vehicle use areas, fishing areas, conservation areas, hiking trails, biking trails and paths, and other public areas. This includes direct demands from military population increases and indirect increased demands from additional population triggered by the Military build-up.

Impacts to animal facilities:

With approximately 40,000 active duty personnel and dependents to the island, how many will be bringing their pets? What is the impact to pet quarantine facilities and veterinarian services?

SOCIO-ECONOMIC IMPACTS

MASS TRANSIT

Observation- a review of Department of Defense (DOD) facilities and land holdings on the Island of Guam show that they are spread throughout the island from south, central, east and north as follows:

- South- Naval Ordinance Annex, Apra Heights
- South-Central- Apra Harbor/Naval Station, Tenjo Vista Tank Farm, Sasa Valley Tank Farm, Nimitz Hill, Naval Hospital
- East- Barrigada Transmitter Site, NCTS Barrigada, Anderson South
- North- South Finegayan Housing, NCTS Finegayan, Northwest Field, Anderson Air Force Base

Most if not all of these facilities are separated by civilian/government lands and foreseeable traffic generation can be expected to increase using the local transportation networks (roads). As such, it is safe to say that most of Guam's public roads will be impacted depending on the level of increased activities connecting these facilities. Furthermore, traffic generation between military installations and civilian/private/government such as commercial, business and residential zoned areas can also be anticipated.

Based on the assumption that any proposed construction of housing facilities will be centrally and northerly located (*Andersen South, expansion of South Finegayan Housing, NCTS Finegayan*), thus increasing traffic movement in the already populated central and northern areas of Guam (*Mangilao, Dededo, Yigo, Barrigada, etc.*)

Traffic can be expected to increase connecting these populated areas as well as traffic generation into the existing commercial and business districts on Guam (*Dededo, Tamuning, Hagatna*), and connecting to southern military facilities (*Naval Station*). The major highways that will be impacted are:

- Route 1- Marine Corp Drive- from AAFB to Naval Station;
- Route 3-North
- Route 15- East
- Route 16-Central
- Route 10 and 4-Central

Traffic generation can also be expected to increase on Route 7 leading up to Naval Hospital with the proposed expansion of the hospital, the construction of a new high school and other related facilities.

Likewise, traffic generation associated with direct military functions and activities can be expected to increase between Naval Station/Ordinance Annex (south) and AAFB(north).

Public (Mass) Transit and Impact of Military Buildup:

Currently, the government of Guam through the Division of Public Transit Services, Department of Administration operates a public transit system supported by a fleet of fifteen (15) buses. This system has been in operations for over 20 years and is comprised of three (3) service categories:

- *Fixed Routes* - this system utilizes 4 of buses on a fixed schedule with designated bus stops connecting three (3) major hubs, Chamorro Village (central), Agat Mayor's Office (south) and Micronesia Mall (north);
- *Demand Response Services* - this system utilizes 6 buses and is designed to serve as a feeder shuttle service into the fixed routes. Riders using this service are required to call in to the dispatcher to schedule a ride.
- *Para-Transit Services* - this system utilizes 5 buses and are reserved for individuals with with a disability who are certified by the Department of Administration and issued a Paratransit ID card;

Over the past five years, the transit system has seen an increase in riders using the system averaging over 20,000 rides (Pax) per month. This number is expected to increase among the present population as dependency continues, and the quality and efficiency of the system improves. The increase in population as a result of the military buildup will result in additional increases in the volume of riders.

The public transit system in its current state is facing difficulties with keeping up with the local demand for services. The added demand from the military community as a result of the increase in military population will place additional as well as new challenges on the Guam Public Transit System.

It is estimated that at least a ten percent (10%) increase in ridership will result from the military community. This translates to about 2,000 additional rides per month just from the military community. It is anticipated that the Guam Public Transit System will have to expand current service routes and add new routes to serve the various military facilities.

The EIS should explore the consolidation or integration of both the Guam Public Transit System and military resources (buses, facilities, etc.) to better serve both population segments. This approach of consolidation or integration of resources should be seriously considered today and in the preliminary planning process that will benefit both military personnel/dependents and the civilian community. If the military currently has a bus system in Okinawa to service its personnel, then consideration should be given to

relocating those buses to Guam to augment the existing public bus transportation system. Potentials and impacts should be considered in the EIS for alternative systems to busses.

CULTURAL AND HISTORIC RESOURCES

The Environmental Impact Statement (EIS) Study should address social and cultural related issues, with the aim to:

- ensure a smooth transition of military members and their families, as well as for the people of Guam;
- ensure the continued preservation of Guam's culture and lands;
- foster and promote civilian and military relations;
- improve the quality of life for military members and their families while stationed on Guam and the local population;
- ensure inclusion of the military members and their families into the community to the maximum extent possible;
- investigate the potential, mutual synergies and efficiencies using shared federal and local resources to support the above objectives.

The following should be included in the EIS study to determine the impact to the community of Guam:

- Assess the attitude of the people of Guam and develop recommendations to mitigate and dispel the ill-perception of "why" the U.S. Marines were forced to leave Okinawa (e.g. rape of a minor, cultural differences, etc).
 - Based on statistics of U.S. Marines in Okinawa pertaining to the ill-effects (e.g. crime, Sexually Transmitted Diseases (STDs), alcohol-related crashes, bar fights, unwed pregnancies, etc), assess Guam's infrastructure and capacity to handle a proportional increase to its existing infrastructure.
 - Assess Guam's current infrastructure in terms of family entertainment, art, music, and cultural activities/alternatives and identify recommendations to overcome any identified shortcomings.
 - Assess Guam's current plans for the Guam Museum and identify cost efficiencies for integrating military history on Guam and the potential for shared funding, while Museum project is still in development (e.g. consider an integrated island-wide museum plan (e.g. National Park Service, Guam Museum, COMNAVMAR, Andersen AFB, and Micronesia Area Research Center).
 - Assess the feasibility of a joint partnership between the military, GovGuam, Consulates and Tourism entities to develop a *cultural reception center* for all newcomers that promotes Guam's culture and resources that ensures quality of
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life during their stay on Guam and provides a better understanding of Guam's "way". Such a center could be located in areas like

- hotel lobbies through Concierge services
 - A. B. Won Pat Guam International Airport
 - Guam Visitors Bureau
 - MWR offices
 - Department of Parks and Recreation postings
 - Assess the available resources to ease the transition of a military member/family moving into and living on the economy (living outside the fence), and identify what village Mayors can do to support their transition (e.g. linking to other families as a local support group).
 - Assess the feasibility of the COMNAVMAR and Andersen AFB historians to educate the public to gain better understanding about the military in Guam to include the development of
 - orientation and cultural sensitivity programs;
 - training programs as appropriate for distinct populations; and
 - Materials that are culturally and linguistically accurate.
 - Assess the current cooperation between the military and local communities and identify recommendations to better integrate the military and local communities to include
 - bringing arts and culture groups to the table to think, act, and invest in what makes Guam unique;
 - increasing awareness, education, and outreach arts and cultural programs;
 - continuing to align villages to various military groups;
 - Creating a steering committee of civilian and military members to coordinate programs for the benefit of the public.
 - Assess the feasibility of utilizing local visual and performing artists during military related functions to foster and promote Guam's culture.
 - Assess the current interaction between DoDEA and GPSS and identify recommendations to integrate or identify collaborative school activities to promote anti-racism and gain a better understanding of cultural differences (e.g. invite DoDEA schools to GPSS schools during Chamorro Week, invite GPSS to DoDEA during Black History Month, other special events, etc.) and to also include
 - increase effective marketing to expand audiences and encourage greater participation and support of the arts by our residents;
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- Build on Guam's unique heritage, develop cultural tourism, and bring the arts & culture to the military through cultural and recreational activities and events.
- Identify if sufficient programs are available to ease the transition and, if not, identify programs that have worked in other communities.
- Identify an annual budget to support any recommendations stemming from the EIS study for social and cultural programs.
- Assess the DoDEA curriculum to determine if it is sufficient to educate youth on Guam's history and culture to include
 - bringing in knowledgeable experts to teach Chamorro language and culture;
 - building a resource pool of Chamorro language and culture teachers and utilizing that resource;
 - bringing Pa'a, CAHA, and other cultural groups to provide programs to the military; and
 - Reviewing and implementing a comprehensive Chamorro Guam-based curriculum in DODEA schools.
- Assess the requirement for additional Chamorro language and culture teachers to include necessary training, resources to teach the teachers, and venues for practical experiences.

Historical and Archeological sites: Every new development site proposed in the EIS alternatives must receive formal historical and archeological site impact review, evaluation and mitigation.

PUBLIC SAFETY AND LAW ENFORCEMENT

Assess the impact of the increased number of military personnel and their dependents, DoD civilian personnel and their dependents, and contractors (i.e. foreign labor workers, US companies) on Guam's law enforcement resources, to include the impact upon Guam's adult and juvenile correctional systems, confinement/rehabilitative facilities, court system, and victim services. Identify actions that will be taken to mitigate negative impacts and jurisdictional issues.

In order to accurately evaluate the impact the military will have on Guam's prison system and its criminal justice system, historical information is required. Data and an analysis of it from various units stationed in Okinawa and other neighboring areas that is related to military and local arrests is needed in order to project the true impact upon Guam's criminal justice system based upon data. The analyzed data should include the number of military personnel that were arrested by local authorities annually in order to accurately project any real impact on our prison system.

The United States Military may have plans to build a correctional facility or brig for all its military personnel but that may not be applicable for local arrests for violations of local laws. This may include for instance: Family Violence, Assault, Murder, Rioting, Theft, Sexual Assault, Robbery, Drug Possession, Public Intoxication, DUI, and a host of other violations that local authorities would have primary jurisdiction.

If we took the assumption that only 2% of the 20,000 military personnel and family expected would be arrested or get in trouble with the law, Guam will need 300 cells. This is a small percentage with a huge impact. Guam's adult correctional facility in its present state would be unable to provide a safe and healthy environment for these prisoners. This enormous impact would be further exacerbated if the local population were involved in the crime. This could impact our prison population exponentially.

HEALTH AND SOCIAL SERVICES

Comments are grouped by main categories. These categories include: general health issues; general mental health, substance abuse and developmental disability issues; general social issues; human resources; funding; infrastructure; policy and legislation and; health insurance. The scoping comments reflect the broad spectrum of healthcare and social services. Following is an overview about the *types of major activities* that should be undertaken by DoD to assess and mitigate impacts:

- Feasibility for partnerships
 - Ascertaining a baseline of services and quantifying military expansion efforts
 - Impact on the system of care for health & social services
 - Impact on existing respite, emergency, day care and residential treatment homes
 - Determining the impact on "minoritization" of indigenous Chamorros; weakening civilian personal and local identities; increased segregation and discrimination; disintegration and weakening of familial and kinship networks; increase in mental health and child abuse problems; capacity building of local health and social services; increased segregation and discrimination and building communication structures between local and military communities
 - Cost benefit investments and analyses of local infrastructures and off-island investment services;
 - Assessing standards of care and ethical requirements
 - Workforce capacity and ability to sustain services post construction phase
 - Current capacity to respond to wide spread epidemics, mass casualties, acts of terrorism, etc.
 - Impact of adult industry (bars, parlors, alcohol and drugs) on health and social welfare
 - Examine the policy of Food Defense and Terrorism for food distribution and outlets to reduce the risk of intentional food contamination between military and civilian
 - Cross mandatory reporting, sharing of information concerning health and welfare of children, seniors and general public health
 - Full inventory assessment of Guam's medical capacity and assess the cost-benefit of shared resources to conduct health screening, x-rays, laboratory exams, and specialized operations
 - Identify health and social high risk factors associated with population expansion
 - Assessing available federal funding streams
 - Analyses of health insurance structures and disparities
 - Local and military policies in accessing healthcare
 - Identify and maximize synergies and cost efficiencies in utilizing joint resources to improve health care and social services (shared funding, shared resources)
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It is important to note that while these scoping comments are specific to health and social services, it should be recognized that transportation, labor, education, infrastructure, public safety, housing, social and cultural issues, and economic development are interrelated areas that impact health and social services.

General Health Issues

- Study the feasibility for partnerships for the provision for health
- Consider the scenario: 2 years from now, over 40,000 people will move to Guam as part of the military's strategic defense plan. Report on the findings with respect to what impact it will have on Guam's health and social service delivery system: hospital and clinic facilities, medical, allied health and social service personnel, funding, supplies, medical equipment, and technology. With the findings, what impact will it have on family, community and social well being?

General Mental Health, Substance Abuse and Disability Issues

- Examine the impact military expansion will have with respect to drug and alcohol abuse on the community, criminal justice system
- Assess the current system of care and the potential impact it will have on residential treatment, the court system, to provide for those who need mental health, substance abuse and disability services
- Assess military expansion plans for mental health and substance abuse treatment and developmental disabilities and determine what measures are needed to meet demand for services.

General Social Issues

- Evaluate military policies to determine if they can be modified to accommodate the local situation.
 - Examine the extent the impact would have upon family income levels and its effect on the welfare system and potential disparities resulting
 - Examine the laws and processes for investigation and resolution of offenses and criminal acts committed by military personnel and their dependants.
 - Conduct a study to determine the impact on the following: "Minoritization" of indigenous Chamorros; weakening civilian personal and local identities; increased segregation and discrimination; disintegration and weakening of familial and kinship networks; increase in mental health and child abuse problems; capacity building of local health and social services; increased segregation and discrimination and building communication structures between local and military communities.
 - Explore the impact on respite care services, emergency shelters for battered women and their children, foster care homes.
 - Assess the impact of existing child care services and foster services to meet the demand
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- Conduct a sustainability plan post military buildup

Human Resources

- Assess the scale of margin with respect to the capacity of medical (family practice, pediatricians, public health doctors, for eg.), nursing, dentistry, pharmacy, barbering and cosmetology, optometry and allied health;
- Assess current workforce capacity of healthcare/ social service providers in both public and private sectors and determine the impact if adequate human resources are not obtained;
- Examine the workforce capacity to handle substantial increase of patients/consumers/customers

Funding

- Determine federal funding streams that are being initiated specifically to address the increase of military personnel on health and social services.
- Conduct a study of similar communities and population size that experienced military expansion and determine the economic impact it had on the health and social service system. What lessons learned would assist Guam's health and social service system in projecting and planning for appropriate funding levels, shared funding and other economy of scales?
- If federal and local funding remained at same levels what would be the implications for sustaining quality of care
- What funding levels would be necessary on an annual basis for 5 years to meet expansion plans for the needs for health and social services?

Infrastructure

- Evaluate the cost benefit of investing in the local infrastructure in lieu of building a brand new Naval Hospital or build a hospital that allows for both military and civilians (the public) to utilize, where there is a shared investment in hospital equipment and facilities.
 - Conduct cost benefit analysis of improving local infrastructure versus providing care off-island
 - Assess current healthcare and social services (hospital, clinics, residential treatment homes, shelters,) and identify areas where capitol investment can be directed to provide care locally vise off-island
 - Assess potential for Guam to serve as a healthcare hub for the western pacific region
 - Study Guam's Emergency Medical Services and Emergency Triage system and determine the human resources, and infrastructure capacity needed to meet military expansion efforts and potential threats to the community if needs are not met
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- Assess Guam's capacity to respond to wide spread epidemics, mass casualties, acts of terrorism, etc.
- Conduct a full inventory assessment of Guam's medical capacity and assess the cost-benefit of shared resources to conduct health screening, x-rays, laboratory exams, and specialized operations
- Identify health and social high risk factors associated with population expansion at this magnitude and determine the full impact it will have upon the current health and social service system.
- With respect to transportation, examine current plans and potential impact to gain access to emergency services, as well as health hazards resulting to fuel emissions
- With respect to the adult entertainment industry, (bars, night clubs, etc.) assess the level and severity of impact upon the community; what will be gained, lost and changed.

Policy & Legislation

- Examine disparities in local laws and military policies (ie) public health reporting, child abuse, environmental health and communicable diseases and its impact upon the community of Guam
- Examine the policy of Food Defense and Terrorism for food distribution and outlets to reduce the risk of intentional food contamination between military and civilian
- With existing public health laws governing animal and food borne complaints, assess the level of risk concerning "imported diseases" as a result of increased population numbers. What changes and/or developments must be made to control further diseases and new vaccines to control a public health outbreak?
- With respect to standards of care, conduct an assessment of regulatory requirements (medical and background clearances), institutional accreditation, provisions to practice at all levels of healthcare, licensing and certification to determine eligibility and quality and fair treatment for all people living on Guam
- Identify and maximize synergies and cost efficiencies in utilizing joint resources to improve health care and social services (shared funding, shared resources)

Health Insurance

- Examine Guam's health insurance industry for both civilian and military personnel and determine opportunities and treats to all family income levels and citizenship
 - Examine the major health policy plans (MIP/Medicaid) and determine the impact upon accessing quality of care
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Recommendations

The following need to be fully assessed by DoD in order to help mitigate negative impacts to Guam's health care and social service systems.

- It is necessary for the community to understand what the DoD policy is with respect to medical treatment, mental health, substance abuse treatment, etc. (e.g. off-base treatment, off-island treatment, etc) and it is necessary that DoD determine the potential impact to Guam's health system
- Focus on assisting the local hospitals and clinics (GMH, DMHSA, Public Health,) to become JCAHO accredited, so that the military can justify, utilize and pay for off-base treatment. Most clinics are JCAHO accredited; therefore, local clinics should be utilized to the maximum extent.

Assess impacts by addressing the following

- What will be the capacity at Naval Hospital and the AAFB clinic?
 - What medical assets will accompany the USMC move?
 - What social service assets will accompany the USMC move?
 - What family support service assets will accompany the USMC move?
 - What are the anticipated personnel/family demographics of the specific USMC units that are slated to move?
 - What are the current utilization rates for social services/family services of the specific USMC units slated to move?
 - Will current COMNAVMAR social service/family service functions be expanding?
 - Are there plans to expand the current US Naval Hospital Guam?
 - Do these plans include an expansion of services not currently provided by US Naval Hospital Guam?
 - What type of care is currently being referred from US Naval Hospital Guam to the local community?
 - Are there plans to recapture this work load?
 - What will be the use of military and their dependants in using welfare benefits (ie) WIC program
 - Are there plans to increase civilian hires of medical personnel from the local community?
 - Will the USMC move have an impact on the DoD/VA sharing agreement, with regard to care provided to VA patients?
 - What is the current level of capacity to provide services for the organization in the organization
 - Can the current level of capacity meet the anticipated growth capacity during military expansion and if not, what will be the solution
 - What are the anticipated nursing education needs of military personnel/family
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- What are the educational levels of the military nurses/family members (particularly BSNs and MSNs)
 - Will the military contribute to expansion/renovation of the nursing school to accommodate personnel/family needing nursing education
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OFF-BASE HOUSING, HOUSING DEMAND, RENT COSTS

The real estate market on Guam has spiked since the speculation of the military build-up. We have seen the increase in prices of land, homes and rental units. The long-term effects will be mainly on the low-income and working class families. Support personnel and contract workers will be arriving to augment the military expansion. Some may be temporary.

Rental prices near economic centers will increase driving those who cannot afford these rents further away from their place of work. Families may find themselves priced out of the market and have difficulty finding places to live close to our island's employment centers. Although Guam is a small island, affordable and reliable transportation could be a problem for those with rental affordability issues. While there are plans to construct housing within the military installations being planned, based upon current DoD policies and practices, its services members are given the option of living off the base and are given a housing stipend. This housing stipend exceeds the amount of money Guam's civilian community, and in particular those in the low to moderate income categories have available. As a result, most of the housing developments are now being geared toward the upper-middle income range.

It is anticipated that current housing production is not expected to match future demand and due to this lag, Guam will run a deficiency in the total housing and most especially affordable units needed. Taking into consideration a population growth that is planned in phases, one gray area is the external demands that usually accompanies any military build-up and effects it will cause. What the housing income mix will be is a factor that needs to be immediately addressed. Another problematic area is pressure being placed on current affordable rental units. While these units have long been a staple for Section 8 clients within the U.S. Housing and Urban Development's Section 8 vouchers program, military BAQ subsidies will adversely affect market conditions, since they offer a higher dollar scale for members opting to live off base. Shifting conditions such as this will inadvertently lead landlords to gravitate more towards military members and thus leaving Section 8 clients with little to no rental opportunities. One needs only to look at the current Hawaii rental market with a utilization rate in the 70 to 80 percent lease up rate for its Section 8 program where the low-end renters have been severely affected by this difference in scale.

Presently, the potential availability of housing for low to moderate income families that own property contiguous to military properties is being negatively impacted. They are often denied access to their property or they are denied access to nearby basic infrastructure such as water, sewer, power and established roads. The cost to develop their property in order to provide for access and infrastructure places their ability to build a home on their property out of their financial reach.

EIS Issues That Should Be Addressed:

- **Off-base Housing**

An increase in off-base population is now occurring, even as the DEIS is being developed, as a result of the importation of labor necessary for construction. Numbers of H2 workers and temporary alien employees as well as workers from the US and other territories and the Freely Associated States need to be estimated and their temporary and long term impacts addressed. ✓

These contract workers may rent existing available dwellings and the economic impacts of this should be addressed. The impacts on current and projected home renters in the community should be assessed. Housing Facilities for Temporary Workers (Barracks) should be discouraged if they are not in a compatible land use surroundings and are not supported by the local community. The DOD should bear responsibility in these matters and cannot depend on its contractors to identify and mitigate impacts of temporary workers living off-Base. If sewer, roads and water are not available for the barracks, use of available rental units should be encouraged. Or, barracks on Base for future military uses may be addressed as an alternative means to house construction workers.

- **Housing demand, rent costs:**

The impact on availability and local costs for purchase or renting of housing because of demand from military construction and build-up must be assessed. This assessment should include:

- An in-depth housing needs and assessment study to establish a baseline that could shed light on future housing needs
- Future housing stock and affordability of housing in an escalating housing market
- Possible deficit of affordable housing inventory and correspond effects on low to moderate-income families.
- Current affects of local and military regulatory requirements that create barriers to future housing needs on Guam.
- Identification of ways to remove barriers and other impediments to allow for land resources impacted by military installation to be accessed by the civilian community

- **Civilian Growth**

As employment opportunities are generated by the proposed military installations, the civilian population will relocate to areas near the military installations.

- The impact of the housing demands and the location of the housing developments should be assessed even though they may not be directly related to the military build-up and the creation of new military installations.
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- Building materials costs:
 - The impact on availability and local costs for building materials because of demand from military construction must be assessed.
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GUAM'S ECONOMY

Expansion of the Guam Economy

While it is generally understood that the military expansion program will have positive benefits for the Guam economy, the extent of benefits and any potential impacts on jobs, revenue and additional economic activity have not been quantified.

- The proposed action is expected to increase jobs, revenue and economic activity. The EIS/OEIS should forecast the financial impact of the proposed actions on the Guam economy. In particular, the EIS should project what the cost of living would be on Guam during the period of construction and operation associated with the proposed actions; the number and types of jobs to be created; and the revenues projected to be payable to the Government of Guam. It is expected that the proposed actions will create positive impacts which need to be quantified. However, increases may create adverse impacts as well, such as increases in the cost of housing and homelessness. The EIS must address mitigation measures for potential adverse impacts.
 - The military consistently indicates that military growth is good for the Guam economy since servicemen and women will spend money off-base. The EIS should project how much spending will occur off-base as well as on-base by the various industrial categories. This information will allow business to have market information required for business expansion and new business introduction.
 - Guam is aware that the Navy has decided against locating a carrier strike force in Guam and opting instead to locate the CVN in San Diego. Although we understand that the costs for locating a CVN were determined to outweigh the benefits, we recommend that the EIS address the location of an Expeditionary Strike Group on Guam, given the presence of Marines and the need to transport them. An Expeditionary Strike Group consists of troop transports and support vessels such as The Bonhomme Richard Expeditionary Strike Group that visited Guam in April 2007.
 - The EIS/OEIS should describe whether the assignment of active duty military personnel to Guam will allow Guam to collect income tax as allowed under Section 30 of the Organic Act of Guam. Section 30 allows Guam to collect income tax revenue from active duty personnel stationed on Guam. Currently, as many personnel have been only temporarily assigned to Guam, Section 30 taxes are not paid into the Guam treasury, even though temporarily assigned active duty personnel utilize services on Guam. The EIS must identify mitigation measures to resolve this impact if the military plans to assign active duty personnel to Guam on a temporary basis.
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- Companies doing business with the military are required to comply with Guam "doing business" requirements e.g., business registration, payment of gross receipts taxes, and other requirements. Current military contracts contain a provision which identify these "doing business" requirements but the contracts also state: "Business registration with the Government of Guam is not considered in determining contractor responsiveness or responsibility." At the very least, the EIS should recommend that contractors must be registered with GovGuam upon contract award.

Opportunities for Local Businesses

- Based upon a data base of military contract awards maintained by Guam Economic Development and Commerce Authority, on the average from FY 2002-2007, local contractors obtained 45% of the funds awarded but won 71% of total contracts. Greater opportunity for local businesses to obtain a larger share of the contract amounts awarded is sought.
 - The proposed action will result in significant funding for construction projects. This amount of funding and the scope of projects have and will continue to attract numerous off-island contractors. The EIS should evaluate impacts on local businesses and particularly on local small, disadvantaged and minority businesses.
 - The source of funds to implement the proposed action may not all come from DoD budgets. Non-appropriated funds are exempt from small business targets and if funding from the Japanese Government is considered non-appropriated, local small businesses will have difficulty obtaining a share of such funding. U. S. small business programs are not required to be followed by US contractors in Okinawa, nor can we expect Japanese companies who will use Japanese government funding to comply with small business programs. The EIS must evaluate methods to mitigate against these impacts on small business.
 - On the other hand, if funds to implement the proposed action are appropriated into the DoD budget, small business targets are nation-wide goals ie, if these goals have already been reached in other US locations, use of funding in Guam need not have small business goals. The EIS should evaluate the source of funds from the standpoint of local small business participation.
 - Alaskan Native corporations seem to have some kind of advantage in bidding for military contracts. If this is true, the EIS might evaluate the Alaska Native Corporation model for application to Guam businesses that have remained here during good times and bad similar to ensure greater participation in military contract awards.
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- Local businesses may have franchises to supply certain goods and services to Guam consumers but the military or its contractors can ignore franchises and deal directly with off-island business with the same franchise because Guam is an "overseas" area. The EIS should evaluate the designation of Guam as an overseas area with respect to franchises and ensure that local franchises are respected in the award of contracts.
- Local wholesalers are at a disadvantage in competing with off-island wholesalers since shipping of goods is subsidized by the military. The EIS should evaluate subsidies provided to off-island suppliers of goods and identify mitigation measures that provide greater advantages to local businesses or at least levels the playing field
- General Bice consistently mentions public/private partnerships as the way to fund most improvements needed on or off bases. The public/private partnership model appears to involve private sector start-up funding with an agreement that requires a long term lease of the facility by the military. Assuming that most local businesses do not have or cannot obtain the level of financing required for large military projects, the EIS should discuss how local business/residents can benefit from public/private partnerships. In addition, the EIS must evaluate different models for public/private partnerships and the Government of Guam should be involved in the planning for any public/private partnership to ensure that to the maximum extent practicable, local businesses are included in such arrangements.
- The Japanese Government will funnel its financial commitment of over \$6 Billion through "Special Purpose Entities" which will allow the Japanese to directly benefit. This method of project financing will impact on local businesses and financial institutions. The EIS should discuss how SPEs can be made to provide opportunities for island businesses and residents.
- The EIS should evaluate how military services that are not intrinsically governmental will be performed. If such services will be contracted to the private sector, similar to the Base Operating Support contract for Naval Base Guam, then scopes of work should be tailored to the capabilities of local companies. The EIS should also consider the application of a local business preference system similar to that afforded US companies that compete against foreign companies for U.S. work.
- The EIS should provide estimates of the annual amount and nature of ship repair work so that impacts on this important industry can be evaluated. The EIS should baseline current ship repair capabilities and evaluate them against future needs for ship repair.

Other Economic Considerations

- Most of Guam is considered rural for the purposes of U. S. Department of Agriculture Rural Development Programs. This allows very low to moderate income, first-time homeowners to take advantage of low interest rate programs for home purchases and construction. The 2000 US Census determined that the Village of Dededo is ineligible for USDA's housing programs. Increases in military personnel may result in Guam no longer being classified as rural and declared eligible for USDA programs. As a result of military growth, Tamuning, Yigo and other villages may become ineligible if village populations exceed the 20,000 population threshold for USDA's housing programs. The EIS should identify mitigation measures to off-set this impact.
 - USDA Rural Development's Business & Industry Guaranteed Loan Program provides a government guarantee to private credit to improve, develop, or finance business, industry, and employment and improve the economic and environmental climate in rural communities. This purpose is achieved by bolstering the existing private credit structure through the guarantee of quality loans which will provide lasting community benefits. The maximum loan that can be guaranteed by USDA is \$25 million. Currently, all of Guam is eligible for USDA's Business Programs since the population threshold is 50,000. However, village whose populations increase as a result of military growth may become ineligible for the Business Programs as well. Mitigation measures for this potential impact must be identified in the EIS.
 - The U. S. military owns a number of unused federal property particularly small, isolated parcels that are scattered throughout the island. Given their size and location, it is expected that these parcels of land will not be needed for military expansion purposes. The EIS should assess the need for land in Guam and should recommend release of those parcels not needed for expansion purposes to allow them to be developed so that they can contribute to the Guam economy and reduce federal costs of maintaining these properties.
 - The Guam Economic Development and Commerce Authority manages the former FAA housing area which is contiguous to NCTMS and the South Finegayan Housing area and the area across from the Andersen South Housing, now used for urban assault training. The EIS must evaluate impacts generated by military use of adjacent military properties on the potential for development and operation of these properties for non-military uses.
 - Commercial Fisheries and Transshipment: Guam has had a recent history of large scale fisheries industry using the Apra Harbor port facilities and linked air cargo resources and has had plans for expanded service of foreign and US fishing fleets. Some of the few remaining large scale fisheries resources in the world that are not over-fished, the Western Pacific tuna stocks, are in waters surrounding Guam. Impacts must be addressed on current and potential fisheries including
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transshipment through Guam and development of proposed new fishery facilities in Apra Harbor.

- Impacts on the Guam's tourism industry from the proposed DOD actions must also be addressed.

LABOR

The military expansion in the Mariana Islands poses many potential socio-economic changes that are best addressed with proper economic modeling to generate a range of data projections and produce forecasts for demographics, gross regional product, output (sales), wages and salaries, personnel income, employment and labor force to provide the basis for the analysis related to housing, retail, schools, social services, and local government impacts.

The approach must quantitatively measure where the island is now in terms of human capital, forecast what it will look like incrementally over the next 10 years, identify what resources are available and what resources are lacking, and provide practical alternatives on how best to address these shortfalls.

The plan for labor growth will specify all supporting data and assumptions used in making the recommendations. While the plan can be phased to address resources availability, the complete plan needs to include the following elements:

- A database of current available workers in terms of skills sets and trends that have occurred in these skills sets over the past decade.
- A listing of all potential military projects with as much definition as practically possible over the next 15 years.
- A forecast of the demand for skilled labors by skills sets, including the primary construction industry, the secondary service industry (support service) and the tertiary maintenance and repair industry over the next 10 years.
- A projection of certain significant aspects of the future Guam economy and, in particular, changes to Guam's cost of living in terms of housing, food, utilities, taxes, etc.
- An evaluation of manpower and staffing needs to support the delivery of service at the One Stop Career Center and partners.

It is recognizes that the effectiveness of the strategic planning efforts is dependent upon the accuracy of the forecasts and on the ability of planning efforts to anticipate and adjust to the changes in the forecast. Preliminary indications of the scope, magnitude, and duration of the increase in military activity strongly suggest for an immediate need for a comprehensive economic plan with specific focus on human resources, training, employment, and employment support (i.e. transportation, housing, child care, etc.).

The situational context of Guam's labor market and the results of on-going military growth discussions pose concerns with regard to workforce sustainability and impact of Alien

Labor Force (H2B) to the local and regional community. The recent U.S. Congress approval to remove the restriction of the H2B on military related construction poses several challenges for an island economy and all workforce related issues and the ancillary social economic issues.

Impact of Service and Technical Capacity at Guam Department of Labor

- Compliance and Enforcement
 - Needs for Alien Labor Processing & Certification Division (ALPCD) enforcement and compliance – considering all budget categories (personnel, equipment, supplies, rental, capital outlay, etc.)
 - Funding associated with H-2B compliance and fraud/abuse prevention for ALPCD
 - Technology and Systems
 - Personnel and Administrative Services
 - Needs of GDOL to support an increased department workload as a result of the increased H-2B population to include:
 - Labor market testing within the Guam Employment Service (Wagner Peyser Act)
 - Support for Workman's Compensation & OSHA due to increase in construction activity and the injuries associated with this type of work
 - Support for Wage & Hour division to prevent wage abuses

Based upon the work that has been undertaken by the Labor Subcommittee, they have identified the following to be included in the Guam military build-up EIS/OEIS:

- An assessment and projection of wages by skills sets as well as other job desirability factors, including the potential for upward mobility, and a projection by age cohort from both Guam, Northern Marianas, and insular areas in the Pacific jurisdiction to measure potential labor supply alternatives, including attracting those considered non-employed away from continued dependence on public assistance programs is needed in the EIS. ✓
 - Identification and assessment of the sustained job increase after construction, including the sustained job increases in the military and public/private sectors is required to insure the island is not negatively impacted by meeting immediate short term needs and failing to provide for sustained requirements that could have negative implications for Guam's private sector and its military sector.
 - A listing of training requirements to take the current workforce skill level to meet as many of the skill levels anticipated over the next 15 years. Current training resources need to be evaluated for its current effectiveness in meeting present and anticipated training needs as well as the capacity to provide specialized training to meet anticipated needs. The evaluation should include public sector providers such as the Guam Public School System (GPSS), Guam Community
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College (GSS), University of Guam (UOG), as well as private, non-profit training providers such as the Guam Contractors Association Trades Academy (GCATA), Guam Hotel and Restaurant Association (GHRA), and other civic and private for-profit training providers.

- The EIS must address the impact upon the availability of teachers and other specialty services the DODEA system will have upon Guam's public and private school systems. Inclusive within this assessment is not only the additional demand that will be created by an expanded DODEA system but also those military dependents that would be able to provide services to the civilian school systems.
 - The EIS should provide a monetary quantification of the cost of training to be incurred by the civilian sector and the Government of Guam to meet DoD's labor requirements and an evaluation of all potential funding sources that may be available to address the training costs.
 - An evaluation of potential workforce availability, including sources of labor, current and anticipated market for industrial skilled labors, and the barriers for attracting, recruiting, and retaining these labor forces over the next 10 years.
 - The EIS should address the impact the inclusion of military dependents will have upon federal dollars and training slots that would otherwise be available for Guam's residents who are displaced workers as military dependents also qualify under federal displaced worker programs. The EIS should identify mechanisms to mitigate any negative impacts.
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EDUCATION

The assessment and impact on the increased demands for education facilities and personnel at all levels caused by the proposed DoD actions must be addressed to ensure the goal of maintaining quality, accessible education island-wide (public, private, and DoDEA) at all levels (K-16) is achieved. This includes an assessment and impact for new schools/facilities, sports facilities directly related to school activities, library expansion, military education center expansion, and new facilities outside of the DoDEA school and higher education systems to provide collaborative opportunities and joint program planning for K-16 yet to be determined. This also includes an assessment and impact of the projected demands of the numbers and types of teachers needed; the number of administrators and staff needed; the number of support personnel (i.e. food service, maintenance, library, education centers) needed; and instructional material demands needed.

The most critical information needed are the growth planning factors for the number of DoD civilians and their dependents, contractors and family members, and Pacific region migration growth between 2008 and 2014. The lack of this information is preventing the CMTF Education Subcommittee's ability to assess any impact to the public and private school sectors in all elements of the education systems (K-16), to include vocational/technical training needs. This in turn does not allow feedback to other subcommittees who need to assess the total impact of water, power, sewage, waste disposal, construction, transportation support system requirements, phone, internet, and other needs to support the education system. The location of any projected school/facility needs is also dependent on where these families may reside. This will affect re-districting efforts to spread the appropriate population. Thus, it is critical that through the EIS process, the following be answered:

1. What are the changes to the planning factors of military personnel and dependents growth in the below spreadsheet and when are they projected to arrive on Guam (by year from 2008-2014)?
 2. Are Special Operations Forces (SOF) and family members still part of the projected gains?
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*CAT	Mar- ines	Mar- ine Fam Mem	Navy	Navy Fam Mem	Air Force	AF Fam Mem	Coast Guard	CG Fam Mem	Army	Army Fam Mem	SOF	SOF Fam Mem
2014??												
*Elementary (Age 5-10)	0	1,798	0	10	0	310	10	0	0	189	0	133
*Middle (Age 11-13)	0	585	0	5	0	110	5	0	0	62	0	43
*High (Age 14-17)	0	585	0	5	0	110	5	0	0	62	0	43
*Higher Ed (Age 18&up)	9,700	5,582	1,250	30	2,630	920	30	0	600	587	350	411
*Total	9,700	8,550	1,250	50	2,630	1,450	50	0	600	900	350	630

*NOTE: These numbers reflect growth in population, not total population.

- What growth planning factors can be provided for the number of DoD civilians and their dependents, contractors and family members, and Pacific region migration growth between 2008 and 2014 (broken down by elementary school (ages 5-10), middle school (ages 11-13), high school (ages 14-17), and higher education(ages 18 and above))?

*CAT	DoD Civ	DoD Civ Fam Mem	**Con- tractors	Contr Fam Mem	Pacific Region Migration
2014?					
*Elementary (Age 5-10)	0	??	0	??	??
*Middle (Age 11-13)	0	??	0	??	??
*High (Age 14-17)	0	??	0	??	??
*Higher Ed (Age 18&up)	??	??	??	??	??
*Total	??	??	??	??	??

NOTE: *These numbers reflect growth in population, not total population.

**Contractors include H1, H2, H3, U.S. etc.

- Where will these general populations mentioned above anticipated to work or reside?
- What is the anticipated length of stay of contractors and/or Pacific Region migration (i.e. Federal States of Micronesia)? This is important to know in order to ensure education-related facilities are not over/under constructed based on exaggerated data).

6. What special education planning factors/requirements can be anticipated, what ages, and how many?
 7. What are the anticipated vocational/technical training demands and timelines associated with the trained workforce?
 8. What is the procedure to incorporate new education-related facilities requirements during the EIS process, to include related sports fields/facilities for student activities (i.e. schools, libraries, education centers)?
 9. What is procedure to integrate new education-related new facilities requirements into on-going infrastructure support efforts (i.e. water, waste water, power, EPA assessments, etc)?
 10. What are the guidance/expectations of library support for service members and dependents – to expand or build additional new library facilities?
 11. What are the guidance/expectations of the Education Center support for service members (and family members) – to expand or build additional new learning facilities and/or office space?
 12. What communication infrastructure is being addressed towards band-width and internet capability increases for education-related programs or island-wide demands?
 13. What communication infrastructure is being addressed towards phone line increases?
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Other Impacts That Should Be Addressed in the EIS / OEIS

To follow is a listing of additional issues that also warrant consideration and inclusion in the EIS/OEIS that is being developed.

1. As originally presented by the DOD's proposed "scoping" document, the EIS / OEIS should continue to address all the "factors of interest to the community";
 2. The EIS / OEIS should require a direct dialogue with each of the infrastructure organizations, and to insure that the respective multi-discipline considerations & nuances thereof are incorporated into the Draft & Final EIS / OEIS;
 3. The EIS / OEIS should focus on how the existing & respective Infrastructure Organizations can support the needs of both the civilian and DOD community, and as opposed to establishing separate / independent / duplicative infrastructural systems & services (e.g., power generation, water wells, landfills, etc.) within a small, Island footprint;
 4. The EIS / OEIS should assess the impacts of the Military expansions on the existing & finite levels of industry professionals, contractors, workforce, materials & supplies, etc. ... and as it affects the cost of doing business, the cost of infrastructural construction, and the economic supply Vs. demand curve;
 5. The EIS / OEIS should assess the impacts of the DOD's expansions on the Island's power generation, transmission & distribution infrastructures, and specific to ...
 - Infrastructure, Ports,
 - Infrastructure, Energy ...
 - i. Generation Expansion and Fuel issues,
 - ii. Separation from IWPS Grid issues,
 - iii. Power System issues,
 - iv. Backup Generation issues,
 - v. DON/DOD Procurement related issues,
 - vi. Conditions of War,
 - vii. Upcoming Studies & Projects, and
 - Infrastructure, Water/Wastewater;
 6. The EIS / OEIS should assess the Mobile telecommunication requirements for the DOD's expansions on both Guam and the CNMI, and specific to ...
 - the capacities & locations,
 - the timeline for arrival of all new DOD personnel, and
 - the selection process for mobile telecommunication providers & the types of services;
 7. The EIS / OEIS should assess the establishment of an Exclusionary Zone around Guam and the CNMI, for Navy SPY1 Radar or similar radars from the other service branches, and as premised on the following ...
 - The Navy SPY1 Radar is very powerful and has the capability of interfering with commercial satellite delivery of video signals (television). When the Navy uses such radar within 75-100 miles of Guam or CNMI, it disrupts the delivery of cable television services to residents of Guam and the CNMI by
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disrupting the downlink from commercial satellites to MCV cable television reception dishes,

- This has not been a significant issue previously as few major unit naval exercises were held in waters near Guam, although in June of 2006, television signals were disrupted for approximately two weeks during a multi-nation exercise. With the establishment of berthing for a CVN battle group, these events are likely to become more frequent in the future, and
 - The Hawaiian cable television operators suffered from such disruptions from some time until an exclusionary zone was created around the Hawaiian Islands that prevented the Navy from using SPY1 radar within 75-100 miles of the Hawaiian Islands during routine (non-emergency) operations. Guam and the CNMI need a similar exclusionary zone to avoid disruption of cable television services to the residents of our islands;
8. The EIS / OEIS should assess reimbursements for relocation of the existing network during road or other construction. During road construction or other construction required by the military expansion, it may become necessary to move current viable wireline networks (cable television, telephone and power) to another location. Utilities would expect a continuation of current military policy which is to reimburse the costs of relocating such network, and will cooperate fully with any joint trench efforts in order to keep relocation costs to a minimum;
9. The EIS / OEIS should assess the impacts of the DOD's expansions on the Island's primary, secondary & tertiary roadway systems, and specific to ...
- the Guam 2010, 2020 & 2030 Highway Masterplans,
 - the establishment of an Intelligent Transportation System,
 - planned vs. proposed roadway reconstructions, and
 - Mass Transit, traffic signalizations, bridges, waterways and other roadway activities;
10. The EIS / OEIS should assess the impacts of the DOD's expansions on the Islands Integrated Solid Waste Management Systems, and specific to
- Municipal Solid Waste Landfill Facilities (MSWLF),
 - Solid Waste Transfer Stations,
 - Household Hazardous Waste Facilities,
 - Solid Waste Diversion & Materials Recycling Facilities,
 - Solid Waste Collections for Government, Commercial & Residential Customers, and
 - compliances to regulatory bodies having jurisdiction (e.g., USEPA, GEPA, GPUC, etc.);
11. The EIS / OEIS should assess the impacts of the DOD's expansions on the Island's building construction activities, and specific to ...
- the increased regulatory oversight and enforcement requirements imposed on regulatory Agencies, and
 - the increased cost of construction induced by an increased demand placed on a finite supply of Contractors, and
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12. The EIS / OEIS should assess the impacts of the DOD's expansions on the Island's bus transportation services for students of both the Public and the Private schools, and specific to increases in routes, equipment fuel & maintenance, etc.
 13. The EIS / OEIS should assess the number of active military and veterans who will decide to retire and or live on Guam, and place demands on Guam's Veterans Affairs' services and benefits and determine the nature and impact of the demands (i.e. healthcare, housing, burial, etc.)
 14. The EIS / OEIS should address the affects on Guam's tourism industry and economic sustainability.
 15. The EIS / OEIS should examine the effect on income and wealth inequality (GINI score increase) as some individuals may profit from the base increase while others may be impoverished by it.
 16. The EIS / OEIS should examine the effect the expansion will have on the cost of living, particularly for land and housing.
 17. The EIS / OEIS should include the effect on unemployment and underemployment as a result of military dependents being introduced into the local labor force.
 18. The EIS / OEIS should provide more detailed information in order to effectively plan and project the future needs of the local and military communities. The lack of detailed demographic data, for example, can produce inaccurate population projection counts which may result in poor planning calculations and outcomes. The numbers that have been officially released are too general and do not provide a clear picture as to the extent and make-up of the military buildup. Without specific age and sex breakdown of active duty members and their dependents, planners are left to do much guess work on the make-up of the school age population, the elderly, persons with disabilities, and the labor force. Social and demographic details are necessary to effectuate appropriate policy measures and action plans to meet the needs of the various population sectors.
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Fuetsan Famalao'an
P.O. Box 7932 Tamuning, Guam 96931

May, 2007

Mr. David Bice
Executive Director
Joint Guam Program Office
258 Makalapa Drive, Suite 100
Pearl Harbor, Hawaii 96860-3134
Attn: EV2 JGPO
c/0NAVFAC Pacific

Buenas yan Hafa adai Mr. Bice,

Fuetsan Famalao'an is a voluntary non-partisan advocacy group of concerned citizens committed to the inclusion of the needs and concerns of girls and women in all official plans for any increased U.S. militarization of Guam. Fuetsan Famalao'an strives towards a competent, healthy, just and sustainable island community.

We submit the following input for inclusion in the preparation of the EIS/OEIS for the relocation of Marine Corps Forces to Guam, Enhancement of Infrastructure and Logistic Capabilities, Improvement of Pier/Waterfront Infrastructure for Transient US Navy Nuclear Aircraft Carrier (CVN) at Naval Base, Guam, and Placement of a US Army Ballistic Missile Defense (BMD) Task Force in Guam.

Given the U.S. Military's unprecedented plan and the local, regional and national significance, we insist that the scope of the proposed study include not only an assessment of the impacts on the physical environment but also the interactive social, political, and economic effects on the people of Guam's quality of life and culture.

Consistent with the knowledge we have of our island and the lessons that we have learned from our historical struggles and those of other communities, we strongly recommend that the *procedure* for conducting this particular Environmental Impact Study (EIS) include the following conditions and requirements:

1. That all studies be conducted by contractors independent of the military and in partnership with local institutions and experts. Diverse community input must be actively solicited from families, women & children. We insist upon being partners in the process and need assurance that this assessment will not be dominated by the interests of the U.S. military.
2. That a full disclosure policy be included in the EIS/OEIS. This policy shall include but not limited to, (a) timely transmittal of interim details on decisions regarding the scope, contractors, and standards to be used in assessing each impact before the final

EIS/OEIS and Record of Decision are completed; (b) timely public alert on any ships entering Guam's coastal waters or EEZ that have the capacity of carrying nuclear weapons and/or depleted uranium and whether the military plans on berthing them on Guam; (c) public disclosure on mitigation plans for any contaminations, from known or unknown or omitted risks from military exercises and/or sites which have been deemed contaminated as a result of dumping of hazardous waste. The policy should include full and timely disclosure to Congresswoman Madeleine Z. Bordallo, to Governor Felix P. Camacho, to the Speaker of the Guam Legislature, to the Mayors of Guam and to the Guam Public Library. To ensure that the people of Guam are promptly informed, any and all announcements shall be made through all print and electronic media, including the internet and disseminated within ten (10) days of the any decisions made.

3. In the event that that there is inadequate data or details of the military plans or other information required to properly assess direct, indirect, or cumulative impacts, no implementation of a proposed alternative should occur until said assessment is complete.

The following are areas of concern that we submit for review and inclusion in the EIS as it affects the people of Guam:

Physical effects

- The potential for increased levels of and exposure to military toxins on land, sea, and air from potential radiation exposure due to accidents, etc. These include VOC (volatile organic compounds), jet fuel, metals, pesticides and herbicides that result from aircraft, ship, and vehicle maintenance, wash downs and operations, and base and off-base office and residential construction, maintenance, and operation, as well as increased radioactive exposures if certain weapon systems are stored and used in training.
- Providing noise abatement projects/programs to ensure that the civilian communities near bases will not see or hear an increase in noise pollution from military jets flying over villages/island and land vehicles. This includes increased levels of air and soil pollution.
- Increased use of water and sewer system. In the area of utilities, include gathering data that could negatively affect use of civilian water supply, power and sewer. Outline any other plans, i.e. desalinization plants and the establishment of new wells in the north and south whether the local community will have access to these resources.
- Increased levels of hazardous and non-hazardous waste disposal and potential for diversion, dumping, or leaks. This includes any plans for the military to build additional landfills or incinerators to address the increased military presence on Guam and whether the local community will have access to these resources.

- With the arrival of BMD, as an operational missile defense, Guam is plausibly a first target (as well as being illegal under the 1972 ABM treaty). The EIS should include any emergency plans that will be put in place given the increased potential for missile and other attacks on Guam's military assets.
- There has been talk of constructing a road between Anderson Air Force Base and the Naval Base. The EIS should include the plans with regard to condemnation of lands, fair market value compensation to private land owners, public access to the road to include the local community, increased potential for other land takings including coastal fishing, recreational, historical and sacred site.
- Any and all plans that may include the military building their own power generation and the affects of tapping into the civilian power supply. The EIS should also include assisting the Government of Guam to make improvements to the current infrastructure for these utilities.

Human physical and mental health effects/Healthcare delivery system

- Provide cancer, other diseases and health risk tracking mechanisms among the local civilian community to monitor significant increases in cancer as a result of potential contaminants due to the increased military presence in Guam.
- Measures to ensure the safety of the civilian population from foreign aggression.
- Measures to address increased levels of fear of becoming a victim of crime; increased levels of injury, mortality, and PTSD in the transient and permanent population; and increased levels of alienation and sense of powerlessness among the local population.
- The EIS must include the promotion of respect for diversity and social integration by providing education to military personnel and their families regarding local customs, cultures and traditions. The military must consult with the local government regarding this issue.
- The military must realize the potential conflict that will occur and plan for appropriate social programs to active duty personnel and their families.
- Include the anticipated impacts on the incidence of health and mental health problems and on related resources, service facilities and medical coverage.

DODEA/Education

- The EIS should include any and all plans with regard to the addition of DODEA schools and potential increased enrollment in these schools. The plans should also include whether the military would be willing to work with the local

government in building partnerships with the Guam Public School System and the potential of a charter school.

- Plans, if any to provide options to military personnel to send their children to the Guam Public School System.
- Plans, if any to continue the practice of hiring locally to fill teacher vacancies with the DODEA school system and the number of additional teachers necessary with the plans to build additional schools.
- The plan for reintegration of DODEA students into the Guam Public School System.

Social/political/economic effects

- The EIS should address the affects of intensified defense-dependency will have on Guam's tourism industry and economic sustainability.
- Plans to include equal distribution of contracts (services, products, etc) amongst the local population and to ensure that local companies have first priority for contractual work.
- The military must have a clear defined understanding as to the jurisdiction of local courts in criminal matters regarding all military personnel.

Wages/cost of living/unemployment:

- The effect on income and wealth inequality (GINI score increase) as some individuals profit substantially from the base increase and others are impoverished.
- The effect that will occur regarding inequality in educational and health benefits available to military and civilian segments of population have on social and economic inequality.
- The affect on the cost of living, particularly for land and housing.
- The EIS should include gathering of baseline data on wages earned by women on Guam over the past ten years, and analysis of the anticipated effect on women's earnings from increased competition for local wages.
- Unemployment rates may be initially lowered during construction phase unless labor supply brought in from off-island. The EIS should include the effect on unemployment and underemployment as a result of military dependents being introduced into the local labor force.

- The effect on growth in, and increased reliance, on low-paying retail sector, especially in terms of employment for women.
- Plans to increase economic and employment opportunities for women.
- The potential skewing effects on island-wide and district election demographics and the corresponding political effects, including those evidenced by representation of women in elected leadership positions and in political parties.
- Few if any defense-related industries have grown up on Guam over the last century and are unlikely to do so now. The EIS should include plans to address any defense supply chain multiplier effect on the economy.
- Closing of SRF and other military activities in the 90's resulted in massive relocation of indigenous families from Guam for economic reasons. Outline any plans or likelihood of any new industry being established on Guam and the ability of that industry to provide sustainable employment for women despite fluctuations in military presence.
- Address the economic effect that may potentially increase with retired military personnel on Guam.

Political effects:

- The EIS must include the effect on the decolonization of Guam as a non-self-governing territory under the UN Charter, including minoritization of the Chamoru people as private contractors are brought in for building and operations and the military population increases and to include the Chamoru self-determination (decolonizing vote as a non-self governing territory under the UN Charter which has yet to be conducted).
- The plans should include the effect this will have on the commitment to the democratically approved process of mutual consent by the people of Guam on any major decision affecting Guam's people.
- The effects on cultural attitudes and values towards war and militarism (cultural militarization) and confidence in the democratic process.

Social effects:

- The EIS must include the effects on levels of crime, especially domestic violence, rape, and sexual assault and higher rates of property crime in civilian population with increased poverty and drug use if/when unemployment and wage depression increases.
- The potential for increased human trafficking.

- The EIS should address plans to address the effects of racial and ethnic tensions as the conflicts arise between military and local population.
- The affects of continued segregation of the school systems.
- The affect of overuse utilization/or wear and tear rates and maintenance costs for local roads, recreational facilities, and public services including schools, social welfare, hospitals and other medical resources, police and courts.
- The effects of increased military enlistment among young people, especially with respect to:
 - Brain drain
 - Lower likelihood of college attendance among veteran population than comparable non-veteran population
 - Lower earnings among veteran population than comparable non-veteran population
 - Higher rates of physical disability and PTSD for deployed sectors of the population that enlist
- The impacts of new construction on archaeological, historical, and sacred sites.
- The impacts of global warming on the immediate and long-term future and interaction with the military growth impact (e.g. more intense storms will make military hazardous waste sites more vulnerable to further migration).

Non-human population effects

- The EIS should include assurance from the military that new invasive species such as the brown tree snakes will not be introduced into the island and how the increase of military presence may affect endangered species on Guam.
- Plans to address any potential impact on living/non-living coral reef and marine life.

Public Communication

- For all assessments and studies pertaining to the EIS of the military build-up, intermittent public communication (prior to the final EIS) via print, electronic and town meetings should occur as soon as each step is completed to apprise the public of findings of various assessments and studied.

It is imperative that a tri-annual (years 2014,2017,2020) study and five years thereafter, be conducted to assess the impacts on the physical environment, the interactive social, political and economic effects on the people of Guam's quality of life and culture.

In closing, there is a general sentiment among our people that the scoping meetings were not as successful as publicized. The format was divisive and in some ways intimidating, and clearly not conducive to full community participation. Similarly, the failure of officials to release detailed information to the general public (i.e., the vague language of posters and handouts, and the sudden removal of the Master Plan from the website) places us at a disadvantage in this process and contributes to undue anxiety and fear. All of these factors preclude effective participation and true understanding by the people whose lives will be irreversibly changed.

Should you need further clarification please contact us at fuetsanfamalaoan@gmail.com or at the mailing address listed above.

Senseramente,

Fuetsan Famalao'an

BUREAU OF STATISTICS AND PLANS

(Bureau of Planning)

Government of Guam



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Attention: EV2

Hafa Adai:

In response to your request for comments to the Notice of Intent regarding the Department of Defense (DOD) preparation of an Environmental Impact Statement (EIS) for the proposed Relocation of Marine Corps Forces to Guam, Enhancement of Infrastructure and Logistic Capabilities, Improvement of Pier/Waterfront Infrastructure for Transient U.S. Navy Nuclear Aircraft Carrier (CVN) at Naval Base Guam, and Placement of a U.S. Army Ballistic Missile Defense (BMD) Task Force in Guam, the Bureau of Statistics and Plans (BSP) has the following preliminary comments:

Without knowing the exact number, location, and size of all the projects related to the three "Proposed Actions" mentioned in the scoping meetings, it is impossible for us to provide sufficient detailed comments. We urge the DOD to provide individual scoping meetings for each project or for a small group of similar projects in order to provide sufficient level of detail for each project. These series of meetings will be similar to the scoping meetings conducted for the Kilo Wharf Expansion. At the scoping meeting for the Kilo Wharf expansion, the public and government agencies were able to view various alternative plans and were given the opportunity to provide more focused, detailed input into the design of the EIS.

Overall, it is important that a Master Plan be provided in order to thoroughly review all types of activities associated with the military buildup. In addition, coordination and improved communication between the military and the Government of Guam agencies must continue throughout the review and construction process. In order to ensure that proper monitoring of impacts to natural resources is properly monitored, it is critical that baseline data be collected. This effort needs to be initiated as soon as possible to ensure that data is collected prior to the start of any project. Will the military be collecting baseline data?

Federal Consistency Determination

Federal consistency obligations under the Coastal Zone Management Act of 1972 (CZMA) are independent of those required under NEPA and are not necessarily fulfilled by the submission of a NEPA document, 15 CFR Part 930.37. Section 307(c)(1)(A) mandates that: Federal consistency requires that any action proposed by a Federal agency that will have a reasonably foreseeable effect on any land or water use or natural resource of a State's coastal zone must be consistent to the maximum extent practicable with the enforceable policies of States' federally approved CZMA programs. 16 USC § 1456(c)(1). 15 CFR Part 930 Classified activities that affects any coastal use or resource is not exempt from the requirements, unless the activity is exempted by the President under section 307(c)(1)(B) of the Act. Please refer to §930.30 to §930.46 of the Code of Federal Regulations (15 CFR) Subpart C - Consistency for Federal Agency Activities, for the corresponding provision of the law. If the Federal Consistency determination was not incorporated with the NEPA document, please ensure that Federal Consistency determination document be submitted to BSP for review.

The Coastal Zone Act Reauthorization Amendments of 1990 (CZARA) Public Law 101-508, as well as the Coastal Protection Act of 1996 amended the CZMA to clarify that the federal consistency requirement applies when any federal agency activity, regardless of location, affects any land or water use or natural resource of the coastal zone. This new "effects" language was added by the CZARA to replace previous language that referred to activities "directly affecting the coastal zone," establishing "a generally applicable rule of law that any federal agency activity (regardless of its location) is subject to [the consistency requirement] if it will affect any natural resources, land uses, or water uses in the coastal zone. No federal agency activity is categorically exempt from this requirement."

Mitigation

Will the mitigation measures discussed in an EIS cover the range of impacts of the proposal? What is the scope of mitigation measures that must be discussed? Will it include such things as design alternatives that would decrease pollution emissions, construction impacts, aesthetic intrusion, as well as relocation assistance, possible land use controls that could be enacted, and other possible efforts? Mitigation measures must be considered even for impacts that by themselves would not be considered "significant." Once the proposal itself is considered as a whole to have significant effects, all of its specific effects on the environment (whether or not "significant") must be considered, and mitigation measures must be developed where it is feasible to do so.

Fragile Areas

Fragile areas refer to areas that support significant cultural areas, and natural marine and terrestrial wildlife and plant habitats. In assessing ecological needs, DOD should aim for healthy natural resources, which in turn will produce sustainable military and other uses and benefits.

"What are the ecological conditions necessary to support the military mission, important species or natural communities, allowable public uses and commodities, and to comply with laws?" What are the existing and planned levels of operations or training? What environmental conditions are necessary for these activities? Are there concerns about the condition or management of the natural resources that may affect the mission? How will the military uses of the ecological area governed, and how flexible are the activities and schedules? Will the current and past ecological information be evaluated? Is there a baseline inventory/monitoring that can be used to characterize existing organic and inorganic conditions and to establish an information base for future comparisons?

Will the military seriously examine the legal requirements affecting natural resources, such as the Sikes Act, Endangered Species Act, the Migratory Bird Treaty Act, wetlands regulations and historic preservation requirements? DODINST 4715.3 Environmental Conservation Program, OPNAVINST 5090.1 B and NAVFACINST P-73 are applicable regulations for natural resources conservation. What is the extent of Military's commitments made through NEPA mitigation plans and Biological Opinions for endangered species on the military installation?

Will archeological assessments of the sites be conducted and how good will the members of the military be educated of this need? Will the potential archaeological sensitivity of the total project area be assessed, including the prehistoric past, the historic past and the subsurface disturbance record? Will enough background literature investigations be conducted including existing archaeological studies, historical documents, other surveys, and other data sources? Are there existing source materials that can be reviewed to identify historic land use through time, atlases, maps, drainage plans, and other pertinent records, such as aerial photographs, that can be referenced?

Shoreline Development

Development along the shoreline has the potential to require the removal of coastal marine and terrestrial habitat, increase freshwater runoff to nearshore marine habitat through the increase in impervious surfaces and the removal of vegetation, contribute to the contamination of the shallow freshwater 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. How will these concerns be addressed in the EIS? Additionally, will the development projects on U.S. military property utilize "green infrastructure" practices and attempt to reduce the demand for non-renewable energy and other resources?

How will the direct, cumulative and secondary impacts of the increase in development of private property (e.g., condominiums and other housing developments) along the shoreline, which will inevitably arise (and some having already arisen) in response to the military expansion on Guam, be addressed in the EIS? Surely these consequences should be considered, even if occurring outside federal property, as it is unlikely they would arise if the military expansion was not to occur. How will the Navy work with private developers to accommodate the influx of military personnel while maintaining ecosystem integrity and compatibility with cultural and aesthetic values? Will compensatory mitigation include the impact of projects occurring beyond federal property boundaries (but as a direct result of the military expansion)?

Living Marine Resources

How will the EIS specifically address the potential impact of each project related to the military expansion on the living marine resources in Guam's nearshore waters? These impacts include, but are not necessarily limited to, the direct removal or disturbance of marine habitat, reduced nearshore water quality, and the disturbance of sea turtle and sea bird nesting sites. We are also concerned that the significant increase in the island's population will place further demand on the local fisheries and contribute to the overharvesting of already over-exploited reef fish populations and the populations of other commercially valuable reef organisms.

We also recommend that monitoring of living marine resources be conducted prior to, during, and after construction or dredging activities and that contingency measures be developed for situations in which unexpected or accidental impacts to living marine resources be developed. An example would be a contingency plan for removing sediment from corals and other benthic organisms if sediment levels exceed some pre-determined level and if damage to or destruction of these areas was not expected and not incorporated into a compensatory mitigation package. Such a plan would involve immediately stopping the activities believed to cause or contribute to the excess sediment, and devising some method for removing the sediment from the benthos. If a living marine resource is unexpectedly damaged or destroyed, and the ecological services of these resources are compromised, these lost services should be incorporated into a compensatory mitigation package.

What monitoring regimens will be established to ensure that natural resources are not damaged? We also recommend that monitoring efforts focus directly on the vitality of the living marine resources and not just on environmental variables (e.g., turbidity, nitrates, phosphates, etc.). This is particularly important in areas where dredging is proposed. Rather than rely solely on limited turbidity measurements to determine whether a nearby marine resource is being impacted, monitoring of the nearby marine resources should be conducted regularly, especially during dredging operations.

Again, without knowing exactly what projects are planned as part of the three "Proposed actions," it is very difficult to provide meaningful input towards an EIS that would address all of our concerns. As mentioned above, we strongly urge the Navy to conduct scoping meetings for individual projects or small groups of related projects. It would be helpful to receive information about possible locations and footprints for currently proposed or possible projects, along with known requirements for accommodating these projects. For example, what locations are being considered for the berthing of nuclear aircraft carriers and how deep and how large an area is required for maneuvering the carriers? There are significant living marine resources inside Apra Harbor, and we are concerned that we are not able to provide detailed comments on specific projects that may affect these resources prior to the development of an EIS.

Recreational Areas

How will the Navy address the increased demand for recreational activities/facilities while maintaining compatibility with the surrounding environment and land uses, adequately serving community centers and urban areas, and protecting beaches and passive recreational areas such as wildlife and marine conservation areas, scenic overlooks, and historical sites? Of particular concern is the increased number of individuals participating in recreational activities in the nearshore waters, including scuba diving, snorkeling, boating, jet skiing, fishing, and other activities. An increase in the number of divers and snorkelers at popular sites such as Ypao Beach (in the Tumon Bay Marine Preserve) and the Piti Bomb Holes Marine Preserve, for example, will contribute to the already high density of users at these sites and the visible effects of these users on the living marine resources (trampled coral, increased turbidity, altered fish behavior from fish feeding, etc.). An increase in the number of military personnel engaged in fishing activities (e.g., rod and reel, hook and line, spearfishing) will further contribute to the overharvesting of fish and other marine organisms and potentially lead to conflicts with the local fishing community and other resource users.

Erosion and Sediment Control

Have military officials developed a soil erosion and sedimentation control plan for all of its proposed projects? Erosion and sedimentation control is one of the development policies for the Guam Coastal Management Program (GCMP) in achieving federal consistency. The importance of erosion and sedimentation control is to protect Guam's water sources, coastlines, and the environment in general. Any type of land disturbing activity increases the potential for erosion to occur. Sediment runoff from eroding lands and poorly managed construction sites are pollutants, causing siltation of stream habitat, loss of shorelines, damaged coral reefs, and increased water turbidity.

The Guam Environmental Protection Agency (GEPA) enforces the Guam Soil Erosion and Sedimentation Control Regulations, which affects all individuals conducting land disturbing activities for public or private development. This agency has the authority to

perform on-site inspections and issue notices of violations (NOVs), which could result in work stoppage, penalties, or both. How will the military ensure that proper sediment control be in pursuant to Section 10104, Erosion and Sediment Control Plans and the approved CNMI and Guam Stormwater Management Manual?

As GCMP and Guam Environmental Protection Agency are moving toward management of water resources in watershed units, what are the potential impacts of additional military activities to Guam's watershed priority areas: Northern Guam Watershed, Piti/Asan Watershed (central Guam); and Ugum Watershed (southern Guam)? Should there be disturbance to these areas, will there be community involvement to restore the watersheds?

Urban Development

Land and water resources may still be available to accommodate growth in the island's economy but they must be managed wisely and must be protected from abuse. We must also respect the limitations on the ability of the island's resources to support certain types of uses in certain locations.

With this in mind, it is a policy of the Guam Coastal Management Program with regards to urban development that commercial, multi-family, industrial and resort-hotel zone uses and uses requiring high levels of support facilities shall be concentrated within areas capable of supporting concentrated land development. The development of high-intensity development has often been controlled by historical patterns or where there is a major facility or where the infrastructure is in place such as water, power, roads and sewer.

How will your mission be affected by our policy on urban development? How will your mission affect our island resources and our environment? Will there be baseline studies to determine the present state of the resources and the environment in and around the mission area? With regard to urban development, will Historic Preservation Rules and Regulations and Laws be adhered to if the mission requires encroaching into undeveloped properties?

Air Quality

Clean air is a resource that is very important on Guam. With the proposed military buildup, there is a grave concern that the people of Guam and the environment would be exposed to some degree of pollution, such as: airborne particles and wide variety of toxic gases. Will the military control and monitor their activities to safeguard and ensure Guam's good air quality?

Water Quality Issues

It is a policy of the Guam Coastal Management Program with regards to water quality that safe drinking water shall be assured and shall be protected through the regulation of uses and discharges that pose a pollution threat to Guam's waters, particularly in estuarine, reef and aquifer areas.

The Northern Guam Groundwater Lens has been designated under federal law, as Guam's principal source aquifer by the United States Environmental Protection Agency. Because of the increasing development, there is the high potential that the Northern Groundwater Lens could become contaminated. This area should be regulated and designated as an area of particular concern in order to monitor the types of activity allowed as there are land use activities that may potentially impact our precious primary source of drinking water adversely.

Many land use activities such as agricultural, commercial and residential are conducted throughout the island of Guam. Due to Guam's geological makeup, the Guam Coastal Management Program is deeply concerned of the potential impacts of unregulated and unmonitored activities as well as heavily developed urban areas on the water quality of our surface water and the impacts to the health of our nearshore environment as well as our reefs due to erosion and storm water runoff.

What effects will your proposed mission have on such issues as solid waste disposal, stress to the infrastructure, erosion, hazardous waste, etc... as they may impact the quality of Guam's waters, particularly estuarine, reef and aquifer areas? What measures will be in place to prevent possible deterioration of our water quality? Will there be a baseline study done to determine the level of water quality in and around the proposed mission area?

Hazardous Areas Issues

The intent of "Hazardous Areas" as stipulated in the Procedures Guide for Achieving Federal Consistency with the Guam Coastal Management Program is that development in hazardous areas will be governed by the degree of hazard and the land use regulations. The policy as further specified in the procedures guide are identified hazardous lands, including floodplains, erosion-prone areas, air installations, crash and sound zones and major fault lines shall be developed only to the extent that such development does not pose unreasonable risks to the health, safety or welfare of the people of Guam, and complies with the land use regulations.

The possibility of accidents during the normal transportation and storage of radioactive material, chemicals and explosives add to the vulnerability of the island. Any accidents involving nuclear materials could have far reaching consequences on the island's population and economy.

What kinds of measures are in place to address hazardous materials such as explosives and its impacts to our land use and water use? How will hazardous wastes be disposed of, such as old PCB's? How much will be generated and how will they be handled? How will the impacts to the marine environment, health and safety of our community are addressed from the hazardous materials that are brought in? In the event of an oil discharge or a release of hazardous substance from a vessel, what control measures are in place to address the effects of such hazards into any of Guam's onshore or offshore surface waters?

In the event of any construction in hazardous lands that include floodplains, erosion-prone areas, air installation crash and sound zones, what measures are taken to ensure that such development does not pose unreasonable risks to the health, safety, or welfare of the people of Guam? Will all land-use regulations be complied and adhered to? Will there be efforts to identify natural hazard areas and addressed them within the EIS?

Are there alternative sites identified that will limit the use of construction in flood prone areas and are there measures available to minimize or reduce risk in injury and loss of property which would normally be associated with imprudent use of hazardous areas?

Should debris unearthed while excavating land that were once used for as defense sites be discovered, what measures are taken to ensure that the clean up of those debris do not pose a threat to human health or the environment? How will they be disposed of? Are there written guidelines and standards established to ensure that the discovery of any contaminations that may be found be addressed accordingly?

Major Facility Siting

It is anticipated that the planned military expansion will add a projected seventeen thousand active duty personnel and their families and at least ten thousand in support personnel to the island's population. The population increase will require additional energy resources. At this time local utility companies are urging the military to utilize their existing systems and work with them to increase capacity. With regards to transportation infrastructure the Guam International Airport Authority already has ongoing expansion activities, the Port Authority of Guam has plans in place and is revising its master plan but may need funding to ensure expansion that will meet the military expansion needs, and Guam's highways may need to be expanded in some areas but local contractors are capable of completing such work and the Federal Highway Administration funds can be utilized for such projects.

Increasing capacity and improving service is necessary to convince the military that local utility companies are capable of supplying their needs. At this time discussions between the Consolidated Commission on Utilities and the military continue on this matter.

For reasons such as limited land availability, limited natural resources, reduced environmental impacts and economic feasibility it would be much more beneficial to the island to utilize existing utility and transportation systems and upgrade the systems. Having duplicate systems to serve the community on such a small island does not make sense.

So, a critical question with regards to this policy area is whether the military intends to build energy and transportation facilities for their facilities? If so, what systems are they considering on building and where might they be constructed?

Northern Guam Groundwater

A challenge to the Bureau that has an effect on housing is the efforts to protect the Northern Guam Groundwater Lens.

How does the military plan on protecting the Northern Guam Groundwater Lens?

The Northern Guam Groundwater Lens has been designated under federal law as Guam's principal source aquifer by the United States Environmental Protection Agency. Recent events occurring in certain subdivisions have highlighted gaps in the existing subdivision laws and potential health hazards that can arise. These recent events, related to inadequate sewer infrastructure for the density of housing, resulted in more restrictions and requirements for housing subdivision developments.

Due to the impending increased development of land associated with the Military expansion activities, there is growing concern that the Northern Groundwater Lens could become contaminated. This area should be specially regulated and designated as an area of particular concern in order to monitor the types of activity allowed as there are land use activities that may adversely impact our precious source of drinking water.

Community Planning

Land is probably the most limited resource on our small island. Our future communities need to be planned and zoned so that business, industrial, and military exercise areas are not in close proximity of housing developments. This would address both safety and quality of life issues. Considering that so much will happen soon, we must address how the new activities will affect the natural landscape of the island and resources that will be affected by adjacent developments. How does the military intend to address these issues? How does the military intend to promote efficient community design with the limited land resources?

Green building practices reduce negative environmental impacts, while using the features of the site to enhance human comfort and health. Preserving site resources and conserving energy and materials in construction and building operations are important

benefits. Planning can greatly reduce construction, utility, and maintenance costs. The following are house design considerations to ensure green design is incorporated:

- Location relative to transportation, sewer, water, power, fire and other existing infrastructure
- Natural site characteristics that may enhance or restrict design, e.g. solar access, stream corridor, on-site raw materials, cluster of trees, topographic rise, microclimate, soil texture, renewable energy sources, etc.
- Efficient use of space for floorplan layout, e.g. shape and size
- Environmentally and socially considerate parking and road network, e.g. efficient access, reduce impervious materials, community oriented
- Green product material selection
- Efficient and comfortable floorplan, energy and water efficiency, and indoor air quality
- Home renovation and demolition
- Construction waste management plan
- Topographical features that influence drainage and air movement
- Groundwater and surface runoff characteristics
- Soil texture and characteristics (bearing, compatibility and infiltration rates)
- Air movement patterns
- Neighboring developments and proposed future developments
- Parcel shape and access
- Solar attitude and microclimate factors, e.g. wind load
- Sensitive areas such as wetlands, animal migration or mating areas, and endangered species of plants or animals
- Neighboring cultural and architectural characteristics
- On-site raw materials such as wood, stone, sand and clay available for construction
- Existing trees and native vegetation

Transportation

Will there be a Transportation Study to supplement the Guam EIS/OEIS? Transportation will be evaluated as part of the Federal Consistency Determination. The Transportation Study should include but not be limited to the following: What are the impacts of this increased expansion on Guam's ports, shipping routes? What are the current conditions of major roads, signs, lighting, traffic signals, and speed limits on Guam? Can the current infrastructure support an increase in vehicular volume? What is the carrying capacity of all roads with the current population? Will it be necessary to improve current conditions and build new roads? Will this be coordinated with the Guam Highway Master Plans? Will the planning of new roads take into account increased stormwater run-off, impact to wetlands, increased noise pollution, etc? What are the impacts to air traffic and air transport facilities?

With increased vehicular volume, what will be the effect on potential accidents involving a motor vehicle? Will the EIS address potential increases in driving under the influences (DUIs)? What will happen to vehicle insurance rates? Will there be contingency plans for transport of hazardous wastes?

Will the EIS also address the potential effects of natural disasters (especially earthquakes and floods), typhoon damage, catastrophic infrastructure failures, and sabotage or terrorist attack during handling, storage, and transportation?

Will the EIS address "accidents with low probability but high consequences"? Will the EIS include a separate consequence analysis for maximum severe transportation accidents involving various heavy trucks used and materials they are transporting? For each hypothetical accident scenario, the EIS should provide a detailed description of the relevant assumptions, such as impact speed, fire duration and temperature, proximity to highly populated areas, weather conditions, time required for emergency response, cask performance (loss of shielding and/or containment), and radiological consequences. The EIS should also provide a sensitivity scenario explaining where key assumptions are based on expert judgment and/or limited data and explaining how the calculated consequences would be affected by different assumptions.

Will the EIS address the potential economic impacts of transportation accidents? For accidents which do not involve loss of shielding and/or containment, the EIS should evaluate potential emergency response costs and liabilities for rail carriers, motor carriers, and local governments. For accidents involving loss of shielding and/or containment, the EIS should evaluate cleanup and disposal costs in addition to emergency response costs. The EIS should also address potential adverse economic impacts resulting from perceived risk of spent fuel transportation.

Socioeconomic Impacts

As Guam continues to grow, local officials and community members are constantly challenged by the need to balance fiscal, social, economic, and environmental goals. Hopefully, Guam can accommodate this military development without compromising the day-to-day quality of life for residents. It is important to consider, as early in the planning process as possible, whether the proposed development will have a significant effect on the social and economic welfare of the community.

Will the EIS assess socio-economic impacts of this relocation? How will the socio-economic impact assessment be conducted? What is the methodology; what is the reasoning behind the methodology? This should be thoroughly discussed in the EIS. Depending on the resources available to conduct the socio-economic impact assessment and the specific objectives of the analysis, some methods may be more appropriate than others.

The socio-economic impacts should include quantitative and qualitative measurements of the impact for proposed development. Specifically, will it address the following?

- Changes in population;
- Changes in community demographics;
- Results of retail/service and housing market analyses;
- Demand for public services;
- Changes in employment and income levels; and
- Changes in the aesthetic quality of the community.

Estimates of expected changes in demographics, housing, public services, etc, is essential for planning, to preserve/improve quality of life and minimize potential adverse impacts. Furthermore, the socio-economic impact assessment is vital because it can help communities avoid creating inequities among community groups as well as encourage the positive impacts associated with the development.

Because socio-economic impact assessment is designed to estimate the effects of a proposed development on a community's social and economic welfare, the process should rely heavily on involving community members who may be affected by the development. Specifically, what members of the community will be involved in this process? It is our hope that this process should include community leaders and others who represent diverse interests in the community such as community service organizations, development and real estate interests, minority and low income groups, local government agencies.

Development constitutes a significant change in the type and intensity of use on a parcel of land (e.g., the Northern Guam lens, indigenous limestone forests, wetlands, coral reefs). Depending on the location chosen for the new construction and the type of development, the social impact on the community may affect one group of residents more significantly than another (e.g., farmers, the elderly, low income or minority groups).

It is critically important to devote attention to the potential impacts of development on vulnerable segments of the human population. Hopefully, the proposed development will not require investigation into such possibilities, yet the staff conducting the socio-economic impact assessment should be aware of social equity concerns. Other demographic groups that may be disproportionately affected by the proposed development include adolescents, the unemployed, and women; members of groups that are racially, ethnically or culturally distinctive (e.g., Micronesian population); or occupational, cultural, political or value based groups for whom a given community, region or use of the biophysical environment is particularly important. No category of persons, particularly those that might be considered more sensitive or vulnerable as a result of age, gender, ethnicity, race, occupation or other factors, should have to bear the cost of adverse social impacts. A thorough socio-economic impact assessment can help avoid future inequities associated with new development by preemptively considering the potential impacts of a project.

In thinking about vulnerable populations, it is also useful to examine the consequences of a no-development option. For example, what are the consequences for Guam if there is no relocation?

It is necessary to conduct this socio-economic impact assessment in the context of the other impact assessment components (i.e., fiscal, environmental, transportation). Unfortunately, socio-economic impact assessment often takes a backseat to other types of impact assessment such as fiscal and environmental impact analysis because the impacts are often more difficult to measure, and the social impacts associated with a development are generally more subtle than impacts on a community's fiscal balance sheet or local natural resources.

It is important to bear in mind that while certain individuals or community groups may be active and forthcoming with input into the planning process, other community groups (e.g., low income or minority groups) that may be equally or even disproportionately affected by the proposed development may be less vocal in expressing concerns and interests. In situations where traditionally disempowered groups may be impacted by a development, it is important to make a concerted effort to involve them in the social impact assessment process.

Finally, it is important to note that a socio-economic impact assessment not only forecasts impacts, but should also identify means to mitigate adverse impacts. Mitigation should include efforts to avoid an impact by not taking or modifying an action; minimizing, rectifying or reducing the impacts through the design or operation of the project or policy; or compensating for the impact by providing substitute facilities, resources or opportunities.

Thank you for giving us the opportunity to comment.

Si Yu'os Ma'ase',



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Ref: Comments on the U.S. Marine Relocation from Okinawa, Japan to Guam

Hafa Adai Sir(s):

In response to the public scoping meeting that was held on Guam in April 2007 with regard to the realignment of U.S. Marine forces to Guam for purposes of strengthening its force structure in the Pacific, I am submitting comments on the proposed movement and expansion of military operations to Guam:

- 1) **The Need for Detailed Demographic Data on the Military Personnel and Dependents** – With the movement of Marines and their families, other military personnel, and skilled laborers to Guam in the next few years, Guam's population structure will no doubt change dramatically. Critical issues such as housing needs, labor force, education, social welfare, and population impact must be addressed by policymakers and business leaders alike. It is apparent that current and detailed information is needed to project the future needs of the local and military communities. Detailed statistical breakdown on gender and age groups by active duty and dependents, number of persons with special health care needs and type of need, number of privately owned vehicles, crime rate of the military upon Japan's local community, and other relevant data will be useful in developing plans and programs that will benefit the military and Guam's resident population.

At present, government officials and the public have only received general figures as to the number of active duty and dependents moving to Guam. The government currently maintains detailed housing and population counts on Guam's civilian and military communities conducted by the U.S. Census Bureau on a decennial basis. A decennial census is not sufficient to obtain the critical information for policymakers and planners to determine Guam's current economic performance and what can be expected in the forthcoming years. The lack of detailed demographic data, for example, can produce inaccurate population projection counts which may result in poor planning calculations and outcomes. Thus, government officials must resort to frequent and up-to-date surveys and studies to develop and initiate programs and policy measures in order to meet the needs of the community. In the face of Guam's financial challenges, local funds may not be available to collect current information which leaves much guesswork of Guam's officials to project and fill the public's needs;

- 2) **The Need to Recruit Personnel to Conduct Reviews of Military Projects and Conduct Housing and Economic Studies** – With Guam's perpetuating economic problems and the government's financial crises, administration officials are assessing the existing government structure and working to reduce the size and cost of government operations. The mass exodus of government employees in the late 1990s due to retirement and voluntary separation have resulted in the government's remaining workforce to fulfill the tasks left by exiting staff and management officials. Many agencies are understaffed and unable to take on additional workload. Additional personnel are needed to review proposed military projects, collect and compile statistics, conduct studies, perform needs assessment, and engage in other matters as required.

It is important to note that over the years, Guam's leaders have been faced with making revenue estimates and projections to address Guam's financial situation and market activity without the benefit of an economist to oversee the process. It was only until February 2007 that the Bureau of Statistics and Plans recruited a Chief Economist. The Chief Economist oversees the Economic Research Center, which is made up primarily of entry level staff to collect, compile and process information to produce the Consumer Price Index and the Import and Export reports. Because financial and economic information are critical for an effective policymaking process, recruitment of mid-level personnel (such as senior and associate economists and planners) to produce an updated Housing Needs Study, the Overall Economic Development Plan for Guam, and the Gross Domestic Product will help government leaders set policy direction and identify programs and projects that will assure the greatest benefit to the island. Funding to recruit much needed personnel or providing funds to contract services to conduct such studies and assist in compiling updated statistical information should be discussed and addressed.

I believe that with improved data comes better planning and credible results to ensure that social, housing, education programs, and infrastructural development and public services are in place to service the military and local community alike.

Thank you for allowing me the opportunity to comment. Should you have any questions, please feel free to contact my office by telephone at (671) 472-4201/2/3, facsimile at (671) 477-1812, or email at tlamorena@gmail.com.



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