



# GUAM ENVIRONMENTAL PROTECTION AGENCY



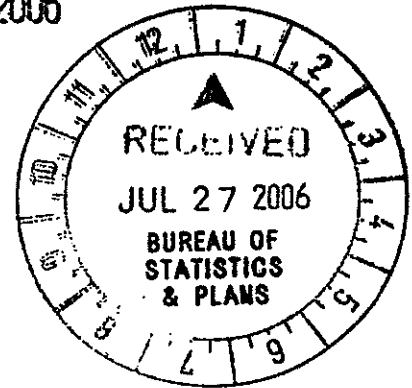
## AHENSIAN PRUTEKSION LINA'LA GUAHAN

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JUL 26 2006

### MEMORANDUM

TO: Acting Director, Bureau of Statistics and Plans  
FROM: Administrator  
SUBJECT: Impact of Increased Military Presence on Guam



Buenas Yan Saluda!

In response to your memorandum received July 24, 2006, concerning information on the anticipated impacts of increased military presence on Guam Environmental Protection Agency services, we provide the following preliminary assessment.

Guam Environmental Protection Agency recognizes that the Department of Defense (DOD) plans to increase forces and activities on Guam in the near future at a large scale and a rapid pace. The proposed Beddown of Training and Support Initiatives at Northwest Field, the redevelopment of Andersen Air Force Base (AAFB) Munitions Igloos, establishment of Global Hawk activities, expansion of the Navy Ammunition Wharf, improvement of Polaris Point submarine support capabilities and other Inner Apra Harbor facilities, development of accommodations and training facilities for the large influx of marines, etc. are notable. These are seen as part of many inter-related DOD activities that are ongoing and planned for development on Guam. It reasonable to believe that the Air Force, Navy and Marines and their supportive resources will implement stated expansions and improvements on Guam as well as possible additional developments that are not yet announced or described. The relative suitability of the U.S. owned properties in Guam as sites to develop DOD facilities are well recognized. Although plans, sites and detailed information on the relatively huge and sudden establishment of new facilities for the US Marines moving to Guam are not yet available, as well as information on other possible projects such as additional craft assignments to Guam and DOD development of infrastructure and housing, these must be taken into consideration also. Until a DOD study or report is provided that comprehensively addresses these numerous existing, developing and planned actions, indicating links among them and possible additional comprehensive approaches to accommodate infrastructure needs, our estimates on anticipated impacts on our services can only be general and preliminary, and subject to revision as more information becomes available.

*"ALL LIVING THINGS OF THE EARTH ARE ONE"*

Guam Environmental Protection Agency has responsibilities and concerns in the following areas that relate to increased military presence:

#### **Solid Waste:**

The Navy Landfill is not in conformity to National and Guam requirements and must stop operations as soon as practicable. The AAFB Landfill meets legal standards but is not designed for capacity to meet even existing rates of waste generation beyond 2007. Besides permitting and regulating these landfills and others that may be proposed by DOD to accommodate military expansion, GEPA also must regulate other disposal activities and the expanded waste storage, recycling, waste separation, collection and transfer activities. 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 for GEPA to meet its mandates on solid waste management planning and regulation.

#### **Hazardous Waste and Clean-Up Sites:**

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.

#### **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.

#### **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 overdue GWA Master Plan then approved by GEPA. If bivouac conditions for expanded DOD training require simulation of lack of infrastructure, alternative methods to allow the training conditions but provide necessary protection to the aquifer will have to be addressed. This would be a new type of permitting to address 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.

#### **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.

#### **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.

Besides directly generating much more work for the GEPA staff, the urgent and well funded DOD development projects promise to lure capable staff trained by GEPA to abandon the Agency for more lucrative positions in support of the military expansion. This will cripple the ability to fulfill GEPA mandates, while the demands are simultaneously greatly increasing.

As requested, we appoint our Chief Planner as GEPA Point of Contact for these matters. Please have your staff call our Planner Mike Gawel at 475-1646 if there are questions or more information is needed.

Dangkolo na Si Yu'os Ma'ase.

  
**ALEJANDRO D. SOTO**  
Acting