

# ***Guam Environmental Protection Agency***

## Scoping Comments for Environmental Impact Statement/Overseas Environmental Impact Statement Mariana Islands Range Complex

July 2007

**RE:** *Notice of Intent (Federal Register Vol. 72, No. 105, dated June 1, 2007) by the Department of Defense to produce an Environmental Impact Statement/Overseas Environmental Impact Statement (EIS/OEIS) on the impacts of conducting military readiness activities in the Mariana Islands Range Complex.*

### **Alternative Training Sites Outside of the Mariana Islands:**

The EIS/OEIS needs to assess what other areas, whether US owned or not, are available or could become available for the same types of training that are proposed for the Mariana Islands. This should be categorized by each type of training exercise requirements and especially identify areas for live fire, amphibious landing, strategic bombing, naval gunfire, and subsurface, surface, and aerial gunnery/missile exercises. Do US allies such as Japan, the UK, France, Australia, Republic of the Marshall Islands, etc. have suitable sites currently being used or that could be made available as alternatives to or back-ups for Mariana Islands sites?

### **New Alternative within the Mariana Islands:**

Rather than increasing training operations by improving and using all existing ranges (Alternative 1) or increasing training by improving and using all existing ranges while adding new operations, expanding to adjacent areas and increasing event tempo and frequency (Alternative 2), we recommend a third alternative be assessed.

This Alternative 3 would increase training operations by increasing event tempo and frequency, with improvements to coordination and scheduling among all units needing training, while improving some existing ranges which would be shared and eliminating some other existing ranges which duplicate the facilities at more appropriate existing ranges. Such consolidation of training sites would have much less impact on island resources and free limited lands for other uses. Concentrating impacts of training at fewer sites should be a planning goal.

To suggest how the EIS/OEIS could be used to address the idea of Alternative 3, the assessment could consider combining similar training from multiple sites to be held at the same site. For example, for each of the seven ranges on Guam that have been suggested as needed to support the relocation of Marines to Guam, the following uses/training activities are listed.

**GUAM SITES FOR MARINE TRAINING SHOWING DUPLICATION:**

<b><u>Naval Station</u></b>	<b><u>Naval Magazine</u></b>	<b><u>NCTS</u></b>
<i>Field Maneuvers</i>	<i>Breacher House Tng</i>	<i>KD small arms range</i>
<i>Close Quarter Combat</i>	<i>Helicopter insert/extrac</i>	<i>Parachute drop zone</i>
<i>KD small arms range</i>	<i>Bivouac</i>	<i>Small level MOUT tng</i>
<i>Helicopter insert/extrac</i>	<i>Land Navigation</i>	<i>Helicopter Landing</i>
<i>C-130 short runway tng</i>	<i>Reconn patrol</i>	<i>Over the Beach insert</i>
<i>Parachute tng drop zone</i>	<i>Sim TRAP w/CAS</i>	<i>Overland maneuvers</i>
	<i>Firebucket tng</i>	
	<i>Sniper range</i>	
	<i>Land Demolitions</i>	

<b><u>Andy South</u></b>	<b><u>AAFB NWF Tng</u></b>	<b><u>AAFB Tarague</u></b>
<i>Supt MOUT, TRUE Tng</i>	<i>Fixed wing AC Tng</i>	<i>Small Arms up to 7.62mm</i>
<i>Convoy Training</i>	<i>Helicopter Tng</i>	<i>Inert 40/60mm mortar</i>
<i>Unit man/urban warfare</i>	<i>FTX/Bivouac Tng</i>	<i>Tracked/pop-up targets</i>
<i>Simunitions only</i>	<i>Small arms live range</i>	<i>CQC Facility</i>
<i>Helicopter insert/extrac</i>	<i>Limited disturb of T&amp;E</i>	

**Barrigada Site**

*TRUE Tng*  
*Overland Maneuvers*

The EIS/OEIS could assess the consolidation of these Training Sites and Ranges with same type of training. For example, other sites could accommodate the training needs listed for NCTS, Barrigada and NWF Training Sites, as shown below. The distances for moving trainees between the sites on Guam are not sufficient to require the luxury of having the larger number of sites that are proposed. Overall scheduling coordination should be emphasized for efficient use of fewer sites.

## **EXAMPLES OF POSSIBLE REDUCTION OF GUAM SITES FOR MARINE TRAINING**

### **NCTS Training Site**

*KD Range, is being conducted on Naval Station.*  
*Parachute drop zone, is being conducted on Naval Station.*  
*Small level MOU Tng, is being conducted on Andy South.*  
*Helicopter Landing, can also be conducted on Andy South.*  
*Over the beach insert, is being conducted on Naval Station.*  
*Over Land Maneuvers, is being conducted at Naval Mag.*

### **Barrigada Site**

*TRUE Tng, is being conducted on Andy South.*  
*Over Land Maneuvers, is being conducted on Andy South and Naval Station.*

### **NWF Training Site**

*Fixed wing AC training, is being conducted on AAFB/Naval Station.*  
*Helicopter training is being conducted on AAFB, Andy South, and Naval Mag.*  
*FTX/Bivouac Tng is being conducted on Naval Mag.*  
*Small arms live range is being conducted on AAFB and Naval Station.*

With Guam's land resources being very limited, the consideration of consolidation of military assets and the intra support between military branches would be beneficial to all. This concept could allow the NCTS, Barrigada, and NWF sites to be left undisturbed, or used for other activities, in the example above. The EIS should apply this concept to evaluate how proposed sites may be reduced and training consolidated, resulting in a third alternative.

### **Impacts beyond Inshore Waters:**

The possibility of consolidating and decreasing impact areas proposed for off-shore training must be assessed, just as on the land areas. Developments or changed uses planned in areas beyond 12 miles from shore should be described, and their alternatives and their impacts should be evaluated. Commercial and recreational fishing grounds include some very large and some smaller submerged banks beyond 12 miles from Guam but within the 200 mile EEZ. These are important to local fishermen and their prime use should be for managed fisheries and ecosystem support for important fish species. The numerous off-shore Warning Areas identified for training should be limited and reduced in number to prevent use in the areas that include the fishing banks. For example, parts of Area W-517 and the area west of Guam should not be planned for use, while the three huge areas east of Guam may be more suitable to avoid conflicts with fishermen..

### **Why an “Overseas EIS”?**

The previous DOD EIS for Military Training in the Marianas (1998) was not 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?

### **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. Besides planning to avoid future impacts through design, improvements and management practices at training facilities, existing problems must be addressed. Contingency plans should outline procedures that DOD will adhere to in the event that they find adverse environmental conditions during the training facilities development. This may include but is not limited to buried or submerged drums/containers, contaminated soil/water and UXOs. Delays for clean-ups or options to develop alternate sites should be addressed.

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 training 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.

### **Explosives Hazards:**

Land use and water use impacts and potential natural resources impacts, especially to native species, from military explosives must be addressed. Detonations in water during naval mine removal training should be minimized and simulation with minimal charges that do not kill fishes or other marine life such as endangered sea turtles should be planned. Restrictions from areas known to have healthy native forests and coral reefs should apply.

### **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 protecting the public (fishermen, divers, tour boats) and of removal of bullets from the coral reefs protected by the US Coral Reef Ecosystem Conservation Amendment Act of 2007 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. Alternative sites that avoid impacts to coral reefs must be prioritized.

### **Electromagnetic Radiation Impacts:**

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

### **Native Species and their 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 training developments 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.

Potential impacts to endangered and threatened sea turtles, marine mammals and seabirds, as well as other marine organisms at the offshore sites must be addressed.

Cumulative impacts to health of ecosystems, including coral reefs, must also 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 increased training 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 or expanded military training 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 sites that protect the coral reef shoals in Apra Harbor from training impacts must be developed and promoted in the EIS. 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 and by siting training exercises far from these resource areas. 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 related to proposed training must be addressed.

### **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 not only all proposed training but also 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 proposed relocation of 8,000 Marines from Okinawa to Guam, facilities for berthing of nuclear aircraft carriers at Guam, placement of an Army Ballistic Missile Defense Group on Guam, the redevelopment of munition igloos at Andersen AFB, establishment of Global Hawk activities, the 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, 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. This would be done in coordination with the development of the Draft EIS/OEIS for the Marines Relocation, etc. Discussion should be provided on compatibility and interdependency of projects and ways to mitigate overall impacts. Comprehensive approaches to accommodate infrastructure needs and multiple uses of sites 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 military build-up 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/OEIS's.

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 the original Kilo Wharf. Much improved and permanent mitigation must be planned in this and other

DOD EIS's. 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.

**Infrastructure, Ports:**

Increased shipping through the Port Authority of Guam related to the planned military expansion is already occurring and will greatly grow during and following the EIS period, overtaxing the already strained resources. Conflicts of use over shared facilities at the Port or interference by military training demands into the critical commercial needs must be addressed.

The EIS should propose and evaluate alternatives that may best serve both the civilian and the military communities on Guam, even investigating DOD support to improve the non-DOD shipping and air transport facilities.

**Impacts to adjacent properties and to Ancestral Lands returned by the Federal Government:**

The impacts of the proposed DOD actions on uses of adjacent non-federal properties and especially on uses of Ancestral Lands returned by the Federal Government should be addressed. There are fears by landowners that training exercises and firing range usage may negatively impact their properties.