



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

December 20, 2006

Mr. Jonathan Wald
Natural Resource Planner
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Facsimile (671) 366-5088

Subject: Final Environmental Impact Statement (FEIS), Establishment and Operation of an Intelligence, Surveillance, Reconnaissance (ISR), and Strike Capability, Anderson Air Force Base, Guam (CEQ #20060483)

Dear Mr. Wald:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

EPA reviewed the Draft Environmental Impact Statement (DEIS) and provided comments to the U.S. Air Force (USAF) on June 27, 2006. We rated the DEIS as Environmental Concerns - Insufficient Information (EC-2) due to concerns regarding impacts to wastewater and solid waste infrastructure, endangered species, noise impacts to children, and the lack of a complete cumulative impacts assessment. To assist decision-makers, we requested that substantial additional information be included on these topics, as well as information on the resource impacts and infrastructure needs of the 1,800 migrant laborers who will construct this project. We made recommendations for reducing project impacts and encouraged the USAF to commit to green building principles as outlined in Executive Order (EO) 13123, "Greening the Government through Efficient Energy Management," and the recently executed "Federal Leadership in High Performance and Sustainable Buildings" Memorandum of Understanding.

A number of substantial improvements were made to the FEIS. EPA appreciates the additional information on the plans to upgrade the Guam Waterworks Authority Northern District Wastewater Treatment Plant as well as the discussion of solid waste disposal options for the project.

We commend the USAF for including mitigation for noise impacts to children and residents by implementing noise level reduction measures for new facilities and military family housing. We especially support the USAF decision to adopt the American National Standards Institute voluntary classroom acoustic standard for the new high school and upgrades to existing

schools on the Base. We recommend the USAF include this important noise mitigation in the Record of Decision (ROD). In addition, we commend the USAF for committing to EO 13123 by ensuring that new buildings have low-flow water saving devices, which can reduce water consumption by as much as 39%. We encourage the USAF to also include energy efficiency and renewable energy in the final building plans, as outlined in EO 13123.

While EPA recognizes the significant improvements in the FEIS and USAF's commitments to environmental protection, EPA has continuing concerns regarding cumulative environmental impacts and direct impacts to endangered species. With regard to cumulative impacts, in our comment letter on the DEIS, we emphasized the importance of including all reasonably foreseeable future actions (RFFA) in the cumulative impacts analysis, with the understanding that per 40 CFR 1502.22, when there is incomplete or unavailable information, an agency's evaluation of impacts can be general and based on theoretical approaches. The FEIS does not include the Marine Corps proposed move to Guam as a RFFA, and the USAF responded to our comment by saying the Marine Corps move to Guam was speculative.

Both the Council on Environmental Quality (CEQ) guidance¹ and EPA's cumulative impacts review guidance² states that long range planning of government agencies should be used in determining RFFAs for a cumulative impacts analyses. It is clear that the Marine Corps move to Guam has been the subject of substantial long-range planning, as indicated on the U.S. Pacific Command's website³, and this action meets the intent of RFFA in the CEQ regulations. As such, a general discussion of impacts expected from the Marine Corps move to Guam should have been included in the FEIS. In addition, it is not clear that cumulative impacts to infrastructure from the required laborers were included in the FEIS. EPA continues to recommend that cumulative impacts from both of these actions be disclosed in the ROD.

EPA also has continuing concerns regarding impacts to endangered species. The FEIS should have specified what "facility requirements" prevented efforts to realign the perimeter road to avoid impacts to higher quality habitat, as EPA recommended. The added mitigation measure to encourage Mariana fruit bat pup recruitment is constructive; however, and we recommend the USAF include this mitigation in the ROD.

EPA appreciates the opportunity to review this FEIS. When the Record of Decision is signed, please send one copy to the address above (mail code: CED-2). If you have any

¹ Council on Environmental Quality, 1997, *Considering Cumulative Impacts under the NEPA*

² USEPA, 1999, Consideration of Cumulative Impacts in EPA review of NEPA documents, p. 11

³ For example: <http://www.pacom.mil/articles/articles2006/060712story1.shtml>.

"Considerable plans of United States Pacific Command [PACOM] to expand the presence of the United States military on Guam" is also referenced in a Senate Report, available at:

http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=109_cong_reports&docid=f:sr286.109.pdf

questions, please contact me or Karen Vitulano, the lead reviewer for this project, at 415-947-4178 or vitulano.karen@epa.gov.

Sincerely,

/S/

Paula Bisson, Manager
Environmental Review Office
Communities and Ecosystems Division

cc: Earl Campbell, U.S. Fish and Wildlife Service
Adrienne Loerzel, Staff Assistant, Office of the Governor of Guam
John Jocson , Acting Administrator, Guam Environmental Protection Agency
Mike Gawel, Chief Planner, Guam Environmental Protection Agency
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