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BUREAU OF STATISTICS & PLANS

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Lorilee T. Crisostomo
Director

JUN 18 2014

TO: Joint Guam Program Office Forward
P.O. Box 153246
Santa Rita, Guam 96915

Office of the Governor of Guam
Attn: Military Build Up Office (Mark Calvo)
Ricardo J. Bordallo Governor's Complex
Adelup, Guam 96910

SUBJECT: Bureau of Statistics and Plans' Input/Comment on the Draft Supplemental Environmental Impact Statement (SEIS)

Hafa Adai! Thank you for giving us the opportunity to comment. Due to the enormous volumes of documents to review, the Bureau of Statistics and Plans (BSP) will continue to review the documents and provide additional information when necessary. Also, we look forward in having continued dialogues to ensure proposed development activities on the island will be in a manner to foster economic opportunities and stability for Guam without adversely affecting the cultural, environmental, social, and natural resources unique to our island.

In accordance with the provision of the Coastal Zone Management Act Federal Consistency Regulations 15 C.F.R. Part 930.41, we are now in the public comment phase and public notice will be issued starting next week in regards to the April 2014 Joint Region Marianas Final Programmatic Coastal Consistency and Negative Determinations relative to activities proposed in the Draft SEIS. As agreed upon, BSP will provide its position on continuing the phase approached or addressing another process by July 15, 2014.

Please note our following comments on the draft SEIS with cited pages to add, replace, where applicable, to information that was previously provided:

Appendix D, Page 3-48/D-98

On the fourth paragraph of 3.4.5.1 Overview of Approval Process, amend and remove entire sentence regarding Guam Seashore Reserve review authority to GBSP.

Appendix D, Page 3-51/D-101

On the second paragraph of 3.4.5.5 Guam Bureau of Statistics and Plans, Guam Coastal Management Program, amend and remove the entire sentence citing that the GCMP will assume the administrative responsibility of the new Seashore Reserve Plan.

Appendix D, Page 4-43/D-157

On Table 4.4-1 Overview of Agency Response to Questionnaires, amend column regarding GCMP's staffing challenges to include "retirement and transfer" and amend column staffing impacts statement to be replaced with "constraint on prioritizing grant tasks versus proposed build-up activities."

Appendix D, Page 4-85/D-199 and Page 4-89/D-203

BSP does not agree with the estimates provided on Table 4.4-52.

Appendix D, Page A-3/D-307

Update to include the following:

Leadership

Name: Lorilee T. Crisostomo
Title: Director, Bureau of Statistics and Plans
Email: lorilee.crisostomo@bsp.guam.gov

Questionnaire Point of Contact- Land Use

Name: Lola Leon Guerrero
Title: Planner IV/Planning Supervisor, Socio-Economic Planning Program
Interim Administrator, Guam Coastal Management Program
Email: lola.leonguerrero@bsp.guam.gov

Questionnaire Point of Contact – Employment and Income; and Revenue

Name: Albert Perez
Title: Chief Economist, Business and Economic Statistics Program
Phone: 475-9685
Email: albert.perez@bsp.guam.gov

Questionnaire Point of Contact – Employment and Income; and Revenue

Name: Monica Guerrero
Title: Planner IV/Planning Supervisor, Planning Information Program
Phone: 475-9679
Email: monica.guerrero@bsp.guam.gov

Appendix D, Page A-4/D-308

On the first comment box regarding North and Central Land Use Plan, add on to stated paragraph:

However, BSP is unsure if this Plan is an enforceable plan or guidance document due to language in Public Law 30-224. Legal opinion is further needed by the Office of the Attorney General.

On comment box regarding Salary Trends, include the following:

2013 Guam Employment Reports – Guam Department of Labor
(March, June, September, December)

Appendix D, Page A-5/D-309

On comment box regarding Most Prominent industries, include the following:

2011 and 2012 Estimates of Gross Domestic Product for Guam – U.S. Bureau of Economic Analysis (BEA) and Guam State Data Center (BSP)

2011 and 2012 County Business Patterns – Guam State Data Center (in BSP)
And online at www.census.gov

2010 Guam Summary File – Guam State Data Center (BSP) and online at
www.census.gov

2010 Guam Public Use Microdata Sample (PUMS) – Guam State Data Center (BSP)

2012 Economic Census, Guam – Guam State Data Center (BSP) and online at
www.census.gov

On comment box regarding Consumer Price Index, include the following:

Guam Consumer Price Index, 2013 (1st, 2nd, 3rd, 4th, quarters), 2014 (1st quarter) –
Business and Economic Statistics Program, Bureau of Statistics and Plans

On comment box regarding Other, include the following:

September 2013 Unemployment Report – Guam Department of Labor, Bureau of Labor Statistics

Impact of the Compacts of Free Association, FY 2004-FY 2013 – Bureau of Statistics and Plans, Planning Information Program, Annually.

Tsunami Inundation Zone and Evacuation Maps, FY 2012, Geographical Information System, Bureau of Statistics and Plans

Guam Street Mapbook, FY 2008, Geographical Information System, Bureau of Statistics and Plans

2011, Guam Statistical Yearbook, Planning Information Program, Bureau of Statistics and Plans, Annually.

2012 Guam Statistical Yearbook, Planning Information Program, Bureau of Statistics and Plans, Annually.

Appendix D, Page A-9//D-313

Update the following:

Leadership

Name: LORILEE T. CRISOSTOMO
Email: lorilee.crisostomo@bsp.guam.gov

Questionnaire Point of Contact

Name: Lola Leon Guerrero
Title: Interim Administrator
Email: lola.leonguerrero@bsp.guam.gov

Appendix D, Page A-10/D-314

Include column in table for FY 2013, and 9 FTE filled and 2 not filled.

On the comment box regarding staffing issues, amend and replace completely with the following:

In FY 2011, the new Administration placed a hiring freeze due to budget constraints. In mid 2012, hiring freeze was lifted. About mid to end of calendar year 2013, capacity of employees has decreased. GCMP currently does not have the capacity to review permit applications in a timely manner due to the decrease in staff. The Biologist (Special Projects Coordinator) program was moved to the University of Guam in November 2013 due to the diving liability issue, the GIS manager retired in June 2013, one Planner III lateral transferred into the BSP Planning Information Program in October 2013, and the Administrator governmental transferred to another agency in December 2013. Also, the NOAA fellow contract ended January 2014 due to no more funding resulting from federal sequestration. In March 2014, GCMP division was moved to another office site

delaying work for a month until new office space was operable. As of June 4, 2014, GCMP only has two Planner IIIs, 1 Planner II, 1 Program Coordinator, 1 Administrative Assistant housed at BSP Adelup office, 1 detailed Interim Administrator from BSP's Socio Economic Planning Program and 1 Program Coordinator funded under the Coral Reef Conservation Grant Program as a Limited Term Appointment. Recruitment to fill vacancies is moving forward. Note that federal grants cover the cost for personnel and operations (office lease, travel, communication, contractual, equipment and supplies).

On the comment box regarding military activities, add sentence to the end of the stated paragraph:

In addition, GCMP only has one vehicle to conduct site visit and the vehicle needs major service and needs to be overhauled.

Appendix D, A-12/D-316

On the comment box regarding Guam Seashore Reserve Plan, amend and replace completely with the following:

As stated before, BSP/GCMP is not an enforcement agency but plays a significant role in the Application Review Process of the Guam Land Use Commission and the Guam Seashore Protection Commission. Although BSP/GCMP invested a lot of time and resources on drafting an update Seashore Reserve Plan, the Department of Land Management (Authority for Plan Implementation) has requested to revisit the draft update, address natural occurrence permit process, and conduct more stakeholders meetings for input. Also, BSP/GCMP wants to provide support to Department of Land Management to enhance its existing structure to implement the Plan. Since GCMP's resources are federally funded, further funding needs to be approved by grantor to continue with the plan update.

Appendix D, A-13/D-317

On the comment box regarding Follow Up to 2010 study, amend and replace completely with the following:

Although BSP/GCMP invested resources on the development of the Guam North and Central Land Use Plan, BSP is unsure if this Plan has been officially adopted to be implemented or used as a guidance document only due to language in Public Law 30-224. While legal opinion is still needed by the Office of the Attorney General, the plan would be used as a guidance document in the meantime. That being said, discussion on reviewing zoning within northern village has started. After GCMP Administrator and staff met with the Dededo village Mayor and the Dededo Municipal Planning Council, GCMP staff noted all the recommendations by the Mayor and the Municipal Planning Council. Recommendations include

proposed commercial activities (i.e. mom & pop stores, Laundromat, food establishments etc.) within their communities; small commercial plazas, multi-unit housing, park areas to name a few. Further discussions are to take place and decision of the Municipal Planning Council is needed before proceeding with addressing the specific proposed areas for rezoning. As a result of a hold on funding for this task, GCMP is unable at this time to move forward until such time the special awards condition is cleared by grantor to continue with this project.

Guam Mitigation Policy has been adopted. However, implementation of rules is being worked on. GCMP is not the enforcement agency. As stated before, GCMP provides technical review support and network coordination with the designated network agencies that have the authority of enforcements.

Appendix D, Page B-26/D-562

On number 9. Guam Seashore Reserve Plan, amend b and c sentences and replace completely with the following:

- b. The goal is to assist Department of Land Management in adopting an update Guam Seashore Reserve Plan. BSP/GCMP will continue to invest its legal counsel to work on the updating the plan.
- c. When adopted, the existing Seashore Clearance Permit process will be more defined and address coastlines vulnerability to various impacts.

In conclusion, we believe that the economic development as a result of the realignment of the Marines to Guam is a positive move for our island. Knowing that the numbers and scope have been reduced and having a longer timeframe for the Build-Up would allow us a better position to capitalize upon opportunities identified, mitigate problems anticipated, overcome challenges, and create a manageable impact on our island community in the coming years.

If you have any questions regarding these comments, you can contact me at 472-4201 or via email at lorilee.crisostomo@bsp.guam.gov or contact any of the Program division heads of BSP at their respective contact numbers and emails. We greatly appreciate your consideration to respond accordingly. Si Yu'os Ma'ase.

Sincerely,


LORILEE T. CRISOSTOMO
Director