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(Department of Land Management)
GUBETNAMENTON GUÅHAN
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Subject: Department of Land Management, Government of Guam Input / Comment on the Draft Supplemental Environmental Impact Statement (DSEIS)

Transmitted herewith are organization requirements of Department of Land Management as they may be impacted by the upcoming military buildup.

The DSEIS provides verbatim, "in conjunction with changes in the mix of personnel involved in the relocation, the adjustments would reduce the originally planned relocation of approximately *8,600 Marines with approximately 9,000 dependents* to a force of approximately *5,000 Marines with approximately 1,300 dependents*. That decision prompted the Department of the navy's review of the actions previously planned for Guam and approved in the September 2010 Record of Decision. This review concluded that while some actions remained unchanged, others, such as *the size and location of the cantonment and family housing areas,* could significantly change because of the force modification. [Thus], the Department of Navy published a new *Notice of Intent (77 FR 61746, October 11, 2012)* and amended the scope of the ongoing Live Fire Training Range Complex SEIS to add those actions that materially changed due to the new force posture".

"The cantonment/family housing preferred alternative at Finegayan would comprise approximately *1,452 acres (588 ha) on a single contiguous parcel of federally-owned land*. The property is bounded on the north by North West Field (NWF) and Route 3 and on the west by a cliffline (within DoD property), the Haputo Ecological Reserve Area (ERA), and the Philippine Sea. The site is also bounded to the east by limited residential development and to the south by the Dos Amantes planned area, also known as the former Harmon Village (non-federal property). Although DoD property descends to the coastline, the cantonment would be situated on the upper area of Finegayan and would not encroach on the cliffline leading to the ocean or the adjacent ERA. On-site DoD utilities development under Alternative A would include buried electrical, communications, water, an

and wastewater lines generally along existing or proposed roadways, a new electrical substation, two communication area distribution nodes, one ground level water storage tank, three wastewater pump stations, a recycling facility, and a solid waste transfer facility. In addition, offsite routing of electrical, water, and wastewater lines would be implemented (mostly along existing roadway corridors for Routes 3 and 9) to connect the new on-base infrastructure to existing utility networks".

"Comments on 2014The LFTRC preferred alternative at (NWF), would comprise approximately 3,981 acres (1,611 ha) on land currently under the custody and control of the federal government. Access to areas within the Ritidian Unit of the Guam National Wildlife Refuge (NWR) that fall within range Surface Danger Zones (SDZ) would be restricted only when ranges are in use. Alternative 5 would impact approximately 265 acres (107 ha) for the construction of the individual ranges, range support building, range towers, range access roads, and a perimeter fence, as well as the replacement of facilities within the Guam NWR that would fall within the range SDZs. The remaining acres would include lands and submerged lands within the SDZ that would not be affected by construction. Power to the site would extend from an existing overhead line at NWF. Potable water service would require installation of a water main along Perimeter Road to connect with an existing water line. Planned wastewater service to the range maintenance building would include construction of a new sewer main along Perimeter Road to connect with an existing sewer line".

The following general comments are provided for your review and consideration:

The DSEIS notes the Department of Defense desire to adopt a new force posture in the Pacific to reflect a significantly smaller and reconfigured force on Guam. The 2014 DSEIS provides discussion that for the most part is intended on utilizing existing federally-owned land resources to accommodate the new posture. The draft, however, provides very little discussion on the impacts due to external development forces and/or development opportunities predicated on the military buildup regardless of the proposed size. Population increases predicated on the buildup is noted as "included growth". As with the development spike occurring between 2005 and 2010, we anticipate similar behavior that may occur outside the realm of control of both the local government and federal military entities. The benefits of economic growth for the island remains obvious, however, we must note land use resources are finite, and while development growth can be controlled within federal areas as discussed in both the 2012 and 2014 report, our local government organization must be afforded necessary tools, assistive to insuring steady economic development and growth to effectuate the best benefit to the island's socio-economic well-being. To clearly address any anticipated level or size of buildup for the island, the Department of Land Management as the lead to addressing land-related matters through its over-arching mandate responsibilities must maintain certain critical resources to include:

1. Adequate and appropriate manpower, as opposed to the suggested 2% increase, efficiently execute the Department's many critical mandates;

2. An updated land use master plan, designed in conjunction or in concurrence with an Island-Wide Comprehensive Plan, adopted and executed with appropriate manpower and up-to-date technological support;

3. Updated Geodetic Control Adjustment and Island-wide Aerial Photogrammetric Mapping, and;

4. Implementation of a permit tracking platform interphase with systems designed for the Department of Land Management, Department of Public Works, and other land resource related local government entities with appropriate access to land use related data as an assistive tool as related to the permitting/licensing review process.

Such tools and resources would serve precursor to articulating, addressing, and resolving the complexities of potential socio-economic impacts that otherwise may not be controllable, and may very well negatively affect core endeavors to promote and protect public health, safety, and welfare of the island.

We foresee our current manpower reaching stress levels to meet its mandate of serving as a primary first tier reviewing and approving agent of all business licenses, contractor license clearance, clearing/grading permit applications, building and final occupancy permits, and various intra-agency clearance procedures inclusive of federal clearance review such as Coastal Zone Management clearances through the Bureau of Statistics & Plans. Stresses will equally affect role as the sole repository of all land information with a potential strain on manpower, materials, and equipment, to include data information software as we anticipate an increase in recordation and information storage of land-related transactions, maps on subdivision surveys and land registration with related processes thereof.

The administration's forecast to meet a housing need of 4,000 units generally reflects immediate needs for Guam's current population, however, this number may increase in light of the upcoming buildup, regardless of significant decreases as prescribed in the DSEIS. With the government encouraging an increase in housing development in the name of providing affordable housing, it remains evident that most pre-buildup housing facilities typically remain with the mid-high to high price range, where an increase in housing development from this stock do not necessarily translate to an attempt to providing homes for all residents of Guam, but instead were inadvertently design to meet a high affordability range specific to higher-paying military-related population, thus, the potential to cause *community gentrification* throughout various Guam communities. And notwithstanding the near 10-year economic infusion into the housing market that may have been contributed by deployed and returning Army National Guard/Reserve (ANGR) personnel, the weight of supply and demand has generally been compromised as a majority of new housing built by private industry generally lean towards a more mid-high and/or high range buyer market, and as a counterweight measure, to meet a demand for low to mid-range housing would be dependent on assistance of the government through available subsidies and programs.

Of such subsidies and programs there exists the operation of the Chamorro Land Trust Commission (CLTC) under the authority of Title 21 GCA Chapter 75. With the CLTC charged as stewards of such resources, the CLTC's underlying mandate is to serve the needs of its benefactors by means of applying methods of appropriate measure and legality to execute the best use and/or disposal of Chamorro homelands. As aforementioned development pressure continue to persist, we predict the appeal to consider such public lands for housing for qualified

benefactors will become more appealing, if not apparent with respect to reducing costs for home development.

In this respect, we again foresee obvious strains on manpower, materials, and equipment consistent with additional growth in the number of recipients. There will also be an impact on the of the Guam Ancestral Lands Commission with predicted strain and pressures due to present growth projections, coupled with growth contributed by the upcoming buildup. These strains and pressures will focus again on manpower, materials, and equipment to insure more land is returned for possible future development.

The following specific comments with cited pages are provided for your review and consideration:

1. On Page 3-104 the DSEIS provides, "[the] approach to determining significance differs from the fixed threshold criterion that was used in the 2010 Final EIS. The 2010 Final EIS applied a strict quantitative threshold of a 2% or higher increase in staffing to determine significance, regardless of any other circumstances or context. While percentage increases in staffing required were considered in this DSEIS analysis, and the 2% level was used to initially screen agency groups for closer evaluation, the additional contextual information that was considered in the impact assessment (e.g., existing agency deficits, capacity going forward, and temporal considerations) is more reasonable and less arbitrary than using a uniform quantitative threshold without real-world context".

   As reported in May of 2011 the Department remains under-staffed to the ever growing demands of the public, compounded by a growing population and interest in land resource development opportunities. Since 2011, Guam Department of Land Management (GDLM) manpower and resources necessary to address the full extent of its departmental mandates have been compromised even further either through attrition or lack of resource funding to support inherent DLM programmatic elements. Since 2011, effects due to the lack of manpower are currently felt relative to meeting the needs of Guam's current populace and end users of our services. Thus, regardless of its significant reduction as proposed in the DSEIS, the new buildup posture represents a formidable factor in adding significant pressures to the department's daily, short-, and long-range workload.

2. Page 4-421 provides, "During construction, all categories of public services agencies combined would require an estimated 130 additional employees, an increase of 2.9% over baseline staffing levels. This maximum increase in staffing levels would be temporary, lasting from approximately 2021 through 2023. The increase in Guam's population from the proposed action would not likely put excessive strain on Guam's public services and permitting agencies. However, staffing requirements for many public service agencies would increase by more than 2% indicating significant impacts. A total of 14 agencies would be affected by the increase in Guam's population. The DSEIS should expand its thought process beyond the prescribed fourteen agencies.

3. Page 4-138 does not identify the Department of Land Management as an agency to be affected by increased population. Contrary, it is an agency maintaining responsibilities and mandates that support and assist in effectuating certain core mandates of those agencies listed.

4. We disagree with findings provided on page 4-139 and request further information be provided to substantiate its "broad perspective" overview of applying a 2.9% increase over baseline staffing for GovGuam agencies.

We appreciate this opportunity to comment the 2014 DSEIS and look forward to providing additional assistance on the matter.

Sincerely,

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Acting Director