



GHURA

Guam Housing and Urban Renewal Authority
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To: Joint Guam Program Office Forward
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Santa Rita, Guam 96915

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

Subject: Guam Housing and Urban Renewal Authority Input / Comment on the
Draft Supplemental Environmental Impact Statement (SEIS)

GHURA has reviewed the Draft Supplemental Environmental Impact Statement (DSEIS) relative to the size of the buildup, the scope and pace of construction activities, the projected increase in population, the impact on the civilian housing market and the impact on various community facilities.

We focused our review processes on the proposed relocation/buildup activities with the potential to impact GHURA-assisted populations of low and moderate income individuals and families. We have concluded that any adverse impact, if any, on this population, would be minimal.

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

Housing

The report indicates the construction of 535 family housing units (preferred location, Finegayan). While the figure is low and consists entirely of on-base housing, the concern is for the off-base housing needs of the civilian construction workforce. The conversion of typical single-family housing to spot workforce housing would reduce the availability of affordable housing for purchase or rental. There are approximately 5,000 marines and approximately 1300 dependents anticipated by the height of the relocation in 2021. A separate comment is made for the need to develop unaccompanied bachelors quarters. Details on the quantity needed and whether it was existing or to be constructed is discussed in 'Marines', below. *(2.2.2 Cantonment/Family Housing)*

Construction

The report points to a gradual construction period. This in itself is a positive response to the community's early concerns over swift spikes in population resulting from military relocation efforts. However, we did not note details on the phases of construction. *(2.2.1 Relocation of Marines and Associated Population Change)*



Marine Personnel

The DSEIS report indicates that one-third of the 5000 Marines relocating active duty Marines would be Permanent Change of Station personnel (est. 1670 persons) and two-thirds (est. 3330 persons) would be personnel in the Unit Deployment Program (UDP). Permanent Change of Station means that the official relocation of an active duty personnel with their dependents to a different duty station. The UDPs will be deployed to Guam for period of 6 months and would not be accompanied by dependents. However, there is no discussion of requirement to be housed on-base. Regarding housing off-base, the report does not provide details of whether deployment to Guam will continue to be considered as an overseas housing allowance. This overseas status is favorable for reducing competition for affordable rents. *(2.2.1 Relocation of Marines and Associated Population Change)*

Ground Transportation

Off-base roadways are defined as transportation roadway features that support vehicular traffic, public transit service, and pedestrian and bicycle facilities outside DoD military bases. The Guam roadway network must be able to accommodate increased traffic resulting from the proposed relocation of approximately 5,000 marines with their 1,300 dependents once "steady-state" population in-migration conditions are in place after 2028. *(3.12 Ground Transportation)*

Additionally, the construction period would cause a temporary increase in the civilian labor force which will put further demand on the Guam roadway network. Guam's roadway network makes up a majority of Guam's non-military roadway systems. The preferred military cantonment/family housing area is Finegayan. This area of Dededo is home to hundreds of low and moderate income households, many assisted through GHURA development activities.

This can also be viewed as additional support for the improvement to Guam's public transit system.

Water System

The DSEIS indicates that there would be an increased demand of potable water to the GWA potable water system during the construction around year 2021. The estimate does not include indirect long-term impacts from civilian growth. The report does not provide an estimated number to reflect the whole picture. However, they do indicate the demand of potable water to be 3.74 MGd by 2028 (compared to the 2021 estimate of 0.84 - not to include the civilian growth). *(4.1.14.2 Utilities/Environmental Consequences/GWA Water System)*

Water discussion in the DSEIS hinges upon the fact that the local improvements to the water system would proceed as currently mandated by federal regulators. Although GWA would see water distribution issues regardless of the buildup, the DSEIS cites that the Legislature has recently authorized the GWA to finance improvements to its water system, therefore, the system should be improved and therefore the proposed buildup would not have a significant impact on the water system. The report also says that the DoD would supply additional water to GWA to meet the increased demand from the construction workforce. However, they do not indicate what this service means in terms of cost.



Wastewater

The wastewater collections system in Finegayan cannot handle the increase in demand for this project. They propose to connect to GWA's collection system along Route 3 through a relief sewer. Referring to the 2010 Final EIS, the GWA interceptor sewer in Route 3 & 9 would have the capacity to meet the demand. Again they site that the Legislature has authorized GWA to improve its wastewater system. *(4.1.14.2 Utilities/Environmental Consequences/Wastewater)*

If you have any questions regarding these comments, please contact me directly at mjduenas@ghura.org or by phone at 671-475-1378.

Sincerely,

MICHAEL J. DUENAS
Executive Director