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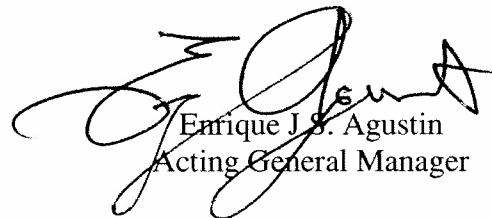
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Attention: GPMO:

Hafa Adai! Enclosed are the Port Authority of Guam's comments on the Draft Environmental Impact Statement/Overseas Environmental Impact Statement for the **Guam and CNMI Military Relocation**: Relocating Marines from Okinawa, Visiting Aircraft Carrier Berthing, and Army Air and Missile Defense Task Force.

Should you have any questions or concerns, please do not hesitate to contact this office.

Sincerely,

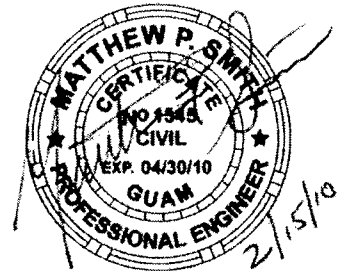


Enrique J. S. Agustin
Acting General Manager

cc: Board of Directors
PAG Planning Division
John Jackson, JGPO Forward, Director



Technical Memorandum



To: Glenn Leon Guerrero, Port Authority of Guam

From: Parsons Brinckerhoff: Matthew P. Smith, Andrea Rosenthal, Jeff Peck, **This work was prepared by me or under my direct supervision**

Date: February 15, 2010

Subject: FINAL Port of Guam Modernization Project - Review of November 2009 Joint Guam Program Office (JGPO) Draft Environmental Impact Statement (DEIS)

Disclosure Statement

PAG is advised that PB personnel were involved in developing four technical discipline assessments related to the Haul Road portion of the JGPO DEIS. Specifically, the four disciplines and individuals involved are as follows:

- Hazmat (Patrick Romero, Seattle office)
- Air Quality (Alice Lovegrove, New York office)
- Traffic Impacts (Kara Swanson, Denver office)
- Historic/Archieology (Jason Bright, Salt Lake City office)

This work was performed for the Department of Public Works under separate contract and is unrelated to the JGPO DEIS review work performed by PB for PAG.

Introduction

In November 2009, pursuant to National Environmental Policy Act (NEPA) requirements, JGPO published a nine volume DEIS discussing the potential environmental impacts of the proposed Guam and Commonwealth of the Northern Mariana Islands (CNMI) military relocations. The proposed actions discussed in the DEIS are complex and involve the U.S. Marine Corps, Navy, and Army and include the relocation of the Marine Corps and their dependents from Okinawa, Japan to Guam; construction of a new deep-draft wharf in Apra Harbor and related shoreside infrastructure improvements to support Navy transiting nuclear aircraft carriers; and development of facilities and infrastructure to support the relocation of Army military personnel and their dependents to establish and operate an Army Air Missile Defense Task Force (AMDTF).

The NEPA lead agency for the EIS process is the Navy. The Navy invited federal agencies that have jurisdiction or technical expertise for components of the proposed actions, or a potentially affected resource, to be cooperating agencies under NEPA. The agencies that are cooperating agencies for the DEIS are U.S. Fish and Wildlife Service (FWS), US Department of Transportation (USDOT) Federal Highway Administration (FHWA), Federal Aviation Administration (FAA), U.S. Environmental Protection Agency (EPA) Region 9, U.S. Office of Insular Affairs, U.S. Department of Agriculture (USDA), U.S. Army Corps of Engineers (USACE)



and the U.S. Air Force. The Guam Department of Public Works (DPW) is a participating agency for the roadway improvement sections for the DEIS.

PB conducted a strategic (i.e., not word for word) review of the DEIS to assess the extent that JGPO considered the effect of their actions on the Port and the planned Port Modernization Program including the Reconfiguration, Maintenance and Repair project. The technical review included the following areas:

- Cargo Forecasts
- Use of Port Property
- Dredging
- Port Projects Included in the Cumulative Effects Analyses
- Ecology
- Traffic
- Air Quality
- Noise
- Contaminated Materials
- UXO
- Security
- Utilities
- Visual Resources
- Socioeconomics
- Historic and Cultural Resources

Findings from the review of technical areas of the DEIS follow. Key findings from the review are summarized in the Conclusions and Recommendations Section at the end of this memorandum. The accompanying spreadsheet contains the individual comments and cites the source for each comment.

Cargo Forecasts

Overview and Analysis

Paragraph 14.2.1.2 addresses the Determination of Significance

Analysis indicates that the significance of impacts to Marine Transportation for vessel visits to Apra Harbor hinges on whether the number of visits exceeds, equals, or falls below historic highs experienced since 1995.

Paragraph 14.2.2.3 addresses construction and operations in Apra Harbor

14.2.2.4 Construction

Analysis indicates that dredging will add 127 vessel trips in the harbor related to the conveyance of Sierra Wharf dredge spoils to open ocean dumping site. It indicates that adding



these vessels to the 2008 vessel count would amount to a 12% increase in vessel traffic for that year. It rates the impact as less than significant.

14.2.2.4 Operations

Analysis indicates that a minimum of three ships carrying amphibious vessels, accompanied by 4 combatant escort ships, could deploy to Apra Harbor a minimum of two times a year for durations ranging between 6 and 21 days. The analysis indicates that adding these ships to the vessel visits would result in less than significant impact given the substantial reduction in the number of vessel visits to the Port of Guam as compared to 1995.

Analysis includes projected container traffic from 2008 through 2018. It identifies the Port as the source of the statistics. It includes commercial and military containers and projects an average of 156,636 containers per year during embarkation with a peak of 190,000 in 2015. The projected average number of containers is double the average number of containers from 1995 to 2008 but the DEIS incorrectly (see discussion below on Port dredging) states that this equates to less than double the number of ships due to increasing vessel capacity. The analysis also indicates that there will be an increase of 149 container vessels above the average visiting the Port of Guam over a one year period assuming **no increase in container capacity** for container ships and that this would still result in less than a significant impact on marine transportation in Apra Harbor due to the historic reduction of 1,902 vessels visiting the Port of Guam between 1995 and 2008.

Recommendations and Response

The Port agrees that historic highs for vessel traffic will not likely be exceeded as a result of the move of military forces from Okinawa to Guam. However, what is missing in the above analysis is the impact to Marine Transportation and traffic into and out of the Port for the following potential activities in Apra Harbor and at the Port:

Summary Points

- A massive increase in non-containerized breakbulk cargo utilizing smaller and higher numbers of cargo transport vessels
 - The increased marine traffic related to breakbulk shipments and expanded wharf operations is not addressed in the analysis.
 - The two Jones Act carriers, namely Matson and Horizon, currently provide shipping services for DOD. It is not clear whether there will be other carriers entering the trade to support the build-up, especially in the area of break-bulk cargo. The JGPO DEIS is silent on this issue.
 - In the early stages the largest increases in cargo traffic and ground-space impacts at the Port will be related to breakbulk cargo. Ground space requirements for handling the combination of breakbulk and container cargo will effectively require site reconfiguration and revised deployment of cranes



and berthing spaces. Breakbulk shipments will compete with container shipments during the scheduling of port calls. There could conceivably be marine traffic impacts as this evolves over time and is concurrently impacted by Port wharf repair and dredging projects.

- Dredging a 600' wide channel through Apra Harbor in support of Air Craft Carrier Berthing at Polaris Point; said dredging to occur for a period of 6 – 18 months
- Potential marine traffic consequences of a change in cargo mix and deferring needed berth bulkhead repairs in favor of a planned (pending) upland maintenance and repair project.
 - In response to the military buildup and its escalating cargo throughput requirements, the Port has altered its normal planned maintenance and repair sequence and capital program expenditures in order improve its near-term cargo handling capabilities before attending to its critical in-water maintenance and repair needs. In a spirit of partnership with DOD, the Port is advancing an uplands maintenance and repair project that requires site expansion and reconfiguration (to support expanded grounding of cargo containers and breakbulk cargo) in order to enhance cargo handling capability in the face of massive growth. This is as opposed to an approach that would involve fixing existing facilities in place and dealing with the temporary reduction of cargo handling capability while berthing space and uplands laydown area is taken out of service to install marine structures.
 - The above-mentioned maintenance and repair approach requires that the Port mortgage (and exhaust its borrowing capacity) its future in order to handle the cargo increases near-term while taking the risk that funds will not be available to address critical bulkhead and fender system improvements following the uplands maintenance and repair effort. The result is that the waterfront facilities will be subject to ever increasing loading (vessel calls, crane usage, surface traffic on wharf) and wear and tear as it continues to deteriorate in material condition. With structural failure already experienced during a 1993 seismic event, risks of catastrophic failure will progressively increase unless and until funding is both identified and made available to finance bulkhead repairs. This risk could materialize in the form of devastating collapse and huge impacts to cargo handling capability and marine traffic for container and breakbulk cargo vessels that would end up queuing in the Harbor.
 - Site reconfiguration is needed along existing wharf structures because of significant change in cargo mix. Huge volumes of breakbulk cargo are projected to support horizontal construction for the military and other impacted infrastructure on Guam. Cargo handling will become more ground-space intensive and will limit the ground area available to process containerized



cargo using the existing wheeled operation. There is potential for significant delays in cargo offloading for both types of cargo if the requested (pending grant/loan package) funding for the uplands maintenance and repair project falls through. If this happens, the queuing of increasing numbers of vessels could occur in the Harbor. This will happen regardless of whether the number count on visiting cargo vessels stays below the historic highs dating back to 1995.

- Repair and replacement of a deteriorated sheetpile bulkhead at berths F4-F6.
 - This is a necessary and planned project needed to shore up the Port's wharves and berthing facilities to secure sustainable operations in the face of increased military cargo of all types.
 - This project will follow the aforementioned uplands maintenance and repair project. As previously mentioned funding for this project has not been identified. The Port's ability to fund it will be significantly impacted by diverting its limited capital program budget and borrowing capacity to the uplands project.
 - If this project is funded through Federal Grants and appropriations and capital recovery charges in the form of cargo tariffs, then the work can proceed in a timely and scheduled fashion. If the project is not funded and the facilities collapse, the repairs will be inefficient and more expensive, longer in duration and likely cause greater delays to marine cargo traffic in the Harbor.
- Reduced berthing access to the port caused by the dredging of the berthing areas between F4 and F6.
 - Dredging to a depth of -42' MLLW will allow fully loaded container cargo ships to visit the Port. This will enhance cargo-throughput using fewer numbers of ships, possibly alleviating temporary traffic impacts in the harbor.
 - Funding for this project is not yet identified. If this project is funded through Federal Grants and appropriations and capitol recovery charges in the form of cargo tariffs, then the work can proceed in a timely and scheduled fashion although it may compete for dredging equipment resources with JGPO dredging. If the project is not funded and dredging is not performed, visiting container ships will have to remain **light-loaded**. Note that this contrary to what is stated in the DEIS about lesser numbers of ships being required due to increasing capacity.
 - The dredging in and of itself will take Port berths out of services for a limited period of time. This may result in temporary queuing of vessels in the harbor with concurrent impacts to other marine traffic.



Use of Port Property

Overview

Use of Port property by the proposed JGPO action was reviewed. The DEIS states use of some areas that are on Port property for the proposed action.

Analysis

The new power plant proposed at Piti and adjacent to the Port is proposed as a long-term alternative for power. The DEIS states that it appears that the property is owned by the Port. An impact analysis has not yet been conducted. The DEIS also identifies the Port as a feasible location for a dredged material dewatering facility and beneficial reuse of the dredged material at the Port as fill for the Port Modernization Program (see the Dredging section of this Technical Memorandum for information).

Summary Points

- Proposed power plant at Piti adjacent to Port appears to use property owned by the Port.
- The Port is identified as a feasible location for a dredged material dewatering facility.
- The Port is identified as a location to beneficially reuse dredged material as fill for the Port Modernization Program.

Dredging

Overview

Volume 1 of the DEIS summarizes the new deep draft wharf for transient aircraft carrier visits to be constructed at Polaris Point with shoreside improvements. The new wharf is discussed in detail in Volume 4 of the DEIS.

Analysis

The new deep draft wharf would be located at the entrance to Inner Apra Harbor channel. The navigational approach would be through Outer Apra Harbor. Ship navigation into the new berth would require a turning basin in front of the wharf. The existing Outer Harbor Channel would be widened to 600 feet with minor adjustments to centerline and navigational aids. No dredging would be required to widen the east-west portion of the navigational channel but due to a sharp southward bend in the existing channel towards Inner Apra Harbor dredging would be required to meet aircraft specifications. A new ship turning basin would be established and would require dredging to -49.5 feet plus 2 feet overdraft. The turning basin would be located near the wharf and north of the Inner Apra Harbor entrance channel.



During dredging, vessel access to the Port could be impeded. The later phases of the Port Modernization Program which includes dredging could encounter insufficient contractor resources to conduct Port dredging. The DEIS (Appendix K) also mentions locating a dredged material dewatering facility at the Port and beneficially re-using the dredged material for fill at the Port for the Port Modernization Program. The location of the dredged material dewatering facility is located in the northeast portion of the Port directly where new gates are proposed as part of the Port reconfiguration, maintenance and repair project and appear to extend into the areas where containers will be placed. The cost of the facility was stated as \$22 million. In addition, use of dredged material as fill at the Port could not be feasible from technical, cost and timeframe perspectives.

The 2005 Dredged Material Management Plan (DMMP) prepared by Weston Solutions found the Port site to be feasible for location of a dredged material dewatering facility. In making this conclusion it also stated that social impacts from noise and traffic are problematic but that management plans could be developed. However, the specifics of these management plans were not provided.

Summary Points

- Polaris Point dredging could impede vessel access to the Port.
- Depending on timing, Polaris point dredging could cause competition for contractor resources needed for dredging for the Port Modernization Program.
- The Port (Commercial Port Field 1) has been identified as a feasible location for a dredged material dewatering facility. The location, in the northeastern portion of the Port, directly conflicts with the location of the new gates and other structures and container storage areas proposed for the Port Modernization Program.
- The Port has been identified as a feasible location for the beneficial re-use of dredged material to be used as fill for the Port Modernization Program. Use of the material as fill at the Port may be infeasible due to cost, technical and timeframe reasons.
- Although the 2005 DMMP by Weston found the Port to be a feasible site for a dredged material dewatering facility and source for beneficial reuse of dredged material it also stated that social impacts from noise and traffic are problematic but that management plans could be developed. These mitigative plans are not included in the DEIS. feasible.

Port Projects Included in Cumulative Effects Analyses

Overview

The DEIS discusses cumulative impacts in Volume 7. Table 4.3-1 lists the past, present and reasonably foreseeable projects on Guam, states the timeframe of the project and whether it was dismissed or retained for the cumulative impact analysis. If the project was dismissed for the cumulative impacts analysis, the reason is given. The lead agency or proponent, point of



contact at lead agency, project name/location, area of interest, construction years, status, description and timeframe for each project is given.

Table 4.3-3 is a summary of potential impacts to resource areas for each project included in the cumulative impacts analysis. If there is the potential for a cumulative impact in a resource area the box beneath the technical area is marked. The resource areas covered in this table include water/wetlands, air quality, noise, air space, land use/ownership, recreation, terrestrial biology, marine biology, cultural, visual, marine transportation, utilities/roadways, socioeconomics, hazardous materials, public health and safety, and environmental justice and protection of children.

Analysis

The Port is referred to in Table 4.3-1 as PAG and is mentioned three times in the table as number AH-8, AH-9 and AH-19. For AH-8, the lead agency or proponent is identified as PAG, GovGuam is the point of contact at lead agency, the project name is Guam Port, area of interest is Guam – Apra Harbor, construction years are 2009-2013, status is Request for Proposal issued and proposals reviewed and in process of awarding, description is owner/agent for construction of the Guam Commercial Port, timeframe is future, and the project is retained for the cumulative impacts analysis. AH-9 is the same except that the point of contact at lead agency is MARAD/GovGuam, status is request for proposal issued and proposals have been submitted, and description is construction and commissioning of the facilities, equipment and amenities (\$195 million) that are required to implement the preferred concept “Break-Bulk West” in order to meet minimum requirements of the military buildup construction logistics requirements, and as for AH-8, the timeframe is future and the project has been retained for the cumulative effects analysis. The status for AH-19 is that the DEIS Notice of Availability has been published in the Federal Register on 8/10/07.

For AH-19, the lead agency is PAG, the point of contact at the lead agency is GovGuam and the project name is Commercial Port Improvements, the area of interest is Guam-Apra Harbor, the construction timeframe is 2021-2025, the status is Draft EIS (Notice of Availability (NOA) published in Federal Register on 8-10-07, description is construct new wharf east of Hotel Wharf to accommodate deep-draft container vessels and cruise ships. Dredging and filling of GovGuam submerged lands required, timeframe is unknown and the project was dismissed i.e., not included in the cumulative effects analysis because it is beyond the timeframe for the cumulative impact analysis.

AH-8 appears to be the owners engineer contract that PB currently is performing for the Port. AH-9 appears to be the preferred solution from the 2007 Updated Master Plan. AH-19 appears to be the Deep Draft Wharf project that is on hold.

The Port reconfiguration, maintenance and repair project is not included in the table and therefore, was not included in the DEIS.



Summary Points

- AH-8 appears to be the Port owners engineer contract held by PB and would in of itself not have impacts and therefore should be deleted from the DEIS.
- Port projects to be conducted under the Port owners engineer contract such as the ARRA/USDA Port Improvement Project should be mentioned in cumulative effects anlysis, but not included in the analysis until details are available to permit an analysis.
- AH-9 represents the conclusions of the 2007 Master Plan Update. It is applicable to characterize the overall Modernization Program, but is a program not yet funded. Subsequent to the 2007 Master Plan Update, Master Plan Approval Documents were submitted to and approved by the Guam Legislature. The Modernization Program was separated into three projects labeled as Phase IA, Phase IB, and Phase II. The portion of this program that has near-term projected funding is the Phase IA project otherwise known as the ARRA/USDA Port Improvement Project. Funding for this project could be approved by February 17, 2010. Once technical information becomes available, this project should be included in the cumulative effects analysis. Future Port projects (Phase IB and Phase II) should be identified in the cumulative effects portion of the DEIS but not included in the cumulative effects analysis.
- AH-19 appears to be a proposed Deep Draft Wharf Project that is currently on hold and definitely not funded. Its viability for the future should be confirmed with the Port and should be mentioned but excluded from the cumulative effects analysis at this time.

Ecology Implications

Overview

The DEIS discusses the ecology of the Apra Harbor area and includes an Essential Fish Habitat Assessment (EFH) and other plant and animal species of concern in Apra Harbor.

Analysis

According to the DEIS, the east end of the Port area is vegetated and characterized as scrub forest. It mentions that the Route 11 roadway improvements at Cabras Island in the vicinity of the Port will encroach on scrub forest and tangantangan areas. It is inferred that part of this will be on Port property. According to the DEIS, a total of 43 acres of scrub forest and 14 acres of tangantagan will be impacted along Route 11. It is unclear from the discussion in the DEIS how much of this is on Port property and it is unclear whether or not this acreage is considered to be a substantial impact to vegetation communities.



The 2008 Weston Solutions Final Report on Dredged Material Upland Placement Study located in Appendix K of the DEIS stated that this scrub forest area is feasible for use as a dredged material dewatering facility.

In the direct vicinity of the Port, in the cove between the glass breakwater facility and fuel facilities and cement area, the DEIS identified a known sea turtle nesting area. Other plant and animal species identified by National Oceanic and Atmospheric Administration (NOAA) in the direct vicinity of the Port include sensitive coral, algae, macroalgae, turf algae and bigeye scad fish. Locations of these species are identified in Volume 2, Chapter 11 Figure 11.1-11. The NOAA also identified a coral area of special significance near the Glass Breakwater area. The Port area also was described by Navy studies in 2005 as containing the highest level of zooplankton (it is unclear in comparison to what) and also contains finfish larvae and mollusks.

According to the DEIS, the Western Pacific Regional Fisheries Management Council has characterized all of Apra Harbor as an EFH (refer to Figures 11.1-3 through 11.1-7 in Volume 2, Chapter 11). At the nearby Naval Base Guam, located just south of the Port, seven species of flora/fauna were identified as threatened, endangered or candidate species by US Fish and Wildlife Service, NOAA and Guam Department of Agriculture Division of Aquatic and Wildlife Resources (GDAWR). Additionally, the green sea turtle and endangered hawksbill sea turtle are special-status species reported generally in Apra Harbor according to COMNAV. Similarly, Spinner dolphin, currently listed as a species of greatest concern, has been noted on a regular basis in the general Apra Harbor region according to National Marine Fisheries Service (NMFS) and US Fish and Wildlife Service (USFWS).

Due to the projected increased traffic among the islands from the movement of cargo, personnel and materials, the DEIS also describes potential harm to fragile ecosystems on Guam as a result of the introduction of invasive species.

Accidental transfer of invasive species to Guam due to shipment of supplies, equipment and household goods was discussed as a probable scenario. As a result, it also is probable that invasive species would be introduced through the Port.

Prevention of the spread of the Brown Tree Snake to a non infested area is a major concern on Port exports. In addition, as the DEIS states a comprehensive Micronesian Biosecurity Plan is in the process of development however it not available for review at this time.

Recommendations

It is directly and/or indirectly implied in the DEIS that several plant and animal species (including those listed as species of concern) are in the vicinity of the Port. The invasive species issue is of particular concern to the Port since movement of personnel and goods may introduce invasive species through the Port. The DEIS should specifically address how its dredging efforts in the channel and near Polaris Pt. and the management of invasive species and hazardous cargo shipments will mitigate potential impacts to these sensitive ecological resources.



Summary Points

- In the direct vicinity of the Port, in the cove between the glass breakwater facility and fuel facilities and cement area, the DEIS identified a known sea turtle nesting area.
- Other plant and animal species identified by NOAA in the direct vicinity of the Port include sensitive coral, algae, macroalgae, turf algae and bigeye scad fish. The NOAA also identified a coral area of special significance near the Glass Breakwater area. The Port area also was described by Navy studies in 2005 as containing the highest level of zooplankton (it is unclear in comparison to what) and also contains finfish larvae and mollusks.
- Invasive species including the brown tree snake (BTS), flatworms, various insects and some plants may be introduced through increased cargo through the Port

Traffic Implications

Overview

Traffic conditions and roadway projects related to the proposed JGPO actions are described throughout the DEIS document. The most concentrated discussion of these items is largely summarized in Volume 6, more specifically in Chapter 2 (Proposed Actions) and Chapter 4 (Roadways). Key traffic areas covered in the DEIS are briefly listed below.

Traffic Items Covered in JGPO DEIS (Volume 6)

Chapter Two	Chapter Four
<ul style="list-style-type: none"> • JGPO action alternatives and land use 	<ul style="list-style-type: none"> • Existing traffic conditions
<ul style="list-style-type: none"> • Population trends and projections 	<ul style="list-style-type: none"> • Changes in traffic patterns
<ul style="list-style-type: none"> • Arterials requiring pavement upgrades 	<ul style="list-style-type: none"> • Transit and non-motorized networks
<ul style="list-style-type: none"> • Location/number of bridge replacements 	<ul style="list-style-type: none"> • Future traffic projections
<ul style="list-style-type: none"> • Construction timeline for improvements 	<ul style="list-style-type: none"> • Performance measures (Volume/Capacity, delays, etc)

Chapter 2 provides a detailed overview of the general JGPO alternatives under consideration and describes the recommended improvements to the Guam Roads Network (GRN). Included in these improvements are pavement upgrades, bridge repair/replacements, roadway widening and intersection treatments. Potential timing and phasing of construction activities for near term roadway improvements also are described in Chapter 2 in terms of planning-level timelines.

Chapter 4 provides a high-level overview of the existing transportation system and highlights the existing roadway network on the island with regard to on-base and off-base transportation infrastructure. This chapter also discusses existing traffic demands on these roadways, operational conditions (congestion) during peak traffic periods for key intersections, transit services and non-motorized facilities. The roadway system is divided into four geographic



areas, the North region of the island near Andersen AFB, the Central region, the Apra Harbor region which includes PAG facilities and naval base, and the South section.

Future traffic projections and congestion levels are then described in Chapter 4 which includes a discussion of the anticipated population and employment levels related to the military build-up and the potential volumes that may occur as a result. To assess arterial performance, volume-to-capacity (V/C) was used to measure potential levels of peak period congestion. Additionally, intersection-level traffic analysis was used to measure delays and level of service (LOS) at key roadway crossings. Of the roadways described in Chapter 4 that are critical to the PAG, Route 11 is highlighted as a study arterial and the intersection of Route 1/Route 11 is included in the list of intersections within the Apra Harbor region. The nearby intersection to the south at Route 1/Route 6 also is included in this list. Volume-to-capacity data for Routes 1 and 11 are provided for the 2014 and 2030 horizon as are peak period delays at key intersections such as Route 1/Route 11 and Route 1/Route 6.

Throughout the DEIS, two general horizon years are targeted for the purposes of describing transportation conditions: a short term 2014 timeframe and a longer range 2030 timeframe. These were likely selected to capture the peak (i.e. worst-case scenario) population levels due to the build-up and separately provide a snapshot of conditions in the longer term future.

Analysis

The proposed JGPO actions and related mitigation described in the DEIS appear to adequately discuss transportation issues from the perspective of the general roadway network. However, for the purposes of the Port modernization project some conflicting issues between the JGPO actions and the proposed PAG reconfiguration, maintenance and repair project may need to be resolved to ensure that potential cumulative impacts are fully addressed. The majority of these issues relate to the timing of roadway improvements as proposed in the DEIS and how they correspond to the Port reconfiguration, maintenance and repair project. In addition, the projected traffic congestion on specific roadways affecting the Port-based truck movements is also in question. These issues are summarized briefly below.

Chapter 2 Potential Gaps in Information

- Guam Roadway Network (GRN) improvements No. 13 and No. 14 call for pavement strengthening of Route 1 near Routes 11 and 6. These improvements may disrupt commercial and construction-related truck movements into and out of Port facilities.
- GRN improvements No. 4 and No. 5 would involve pavement strengthening of Route 11 from Route 1 to the Port entrance and intersection improvements at Route 1/Route 11, respectively. These activities may coincide with Port repair and maintenance work, hence affecting vehicle movements to/from Port facilities.
- The timing of GRN improvements to Route 11 and to the intersection of Route 1/Route 11 shows implementation in 2011. Upgrades to Route 1 north and south of Route 11 are expected in 2013. These coincide and conflict with the Port repair and maintenance construction schedule (2010-2013).



- The discussion under Section 2.1.1.8 states that construction of the GRN improvements “would occur from 2010 to 2016 with peak construction in 2013”. This coincides with the Port’s repair and maintenance schedule of 2010-2013.
- Table 2.5-4 *Guam Roadway Network Construction Projects to be Completed Each Year* is further evidence of overlapping schedules between GRN activities and Port repair and maintenance work. Note Route 1 and 11 improvements shown as being completed in 2011.
- The proposed construction of a new power plant at the Cabras/Piti site (summarized in Table 2.1-3) may affect PAG truck movements on Route 11 particularly during high-intensity construction activity.

Chapter 4 Potential Gaps in Information

- The Route 1 volume-to-capacity (V/C) ratio shown in Table 4.2-5 *Alternative 1 and 2 Future ADT and Volume to Capacity Ratio Summary* would exceed 1.00 in Taumuning by 2014 which is an area where Port trucks (commercial and construction related) pass through. This relates to both Alternative 1 and Alternative 2 (Preferred).
- Similar to the above issue: the Route 1 V/C ratio shown in Figure 4.2-20 *Central Region 2014 PM Peak Congestion Levels for Alternatives 1 and 2* is far greater than 1.0 by 2014 (in fact > 1.15) which may affect Port truck movements. This again relates to both Alternative 1 and Alternative 2 (Preferred).
- The level of service (LOS) for the intersection of Route 1 and Route 11 is shown to be at Level E by 2014 during the PM peak hour which indicates heavy congestion and high delays. This high level of congestion may affect commercial truck movements to/from the Port.

Recommendations and Summary Points

In order to fully address Port interests as they relate to the JGPO actions and proposed mitigation measures described in the DEIS, the following actions are recommended:

- The DEIS should address impacts to Port truck movements (including military shipments) on the roadway network due to construction activity on Routes 1 and 11.
- The DEIS should formally address impacts to Port container movements (including military shipments) due to bridge replacements on Route 1 north and south of Route 11.



- The DEIS should assess the impacts of constructing a new power plant at the Cabras/Piti site since it may have some affect on traffic flow on Route 11.

Air Quality Implications

Overview

The DEIS discusses potential air quality impacts by different regions on the island. The area of the island discussed in the DEIS that is applicable to the location of the PAG project is referred to as the Apra Harbor area. JGPO projects that have the potential to impact the PAG or add to impacts from the proposed PAG reconfiguration, maintenance and repair project are as follows:

- Intersection of Route 11 and Route 1 improvements
- Improvements to Route 11
- New diesel power plant adjacent to existing Guam Power Authority (GPA) facilities near the PAG

The DEIS indicates that there could be significant impacts to air quality on the island of Guam due to the addition of power generating facilities. Additionally, the DEIS discusses temporary impacts to air quality occurring as a result of construction activities. However, impacts to air quality around the Port are not anticipated to exceed federal thresholds with the military buildup on Guam.

Analysis

The DEIS indicates that significant impacts could occur as a result of the need for additional power for the island with the military buildup. To accommodate the military buildup, part of the long range alternative is to construct another diesel fired power plant adjacent to the existing GPA facility near the Port. However, the scope of the DEIS does not include analyses of impacts to air quality on Guam from the addition of the new power plant. Therefore, the affects of adding a new power plant near the port would be addressed as part of the environmental permitting process associated with the new power plant project at a later date. Should further air quality analysis be included in the DEIS of the long range alternative (as part of the revisions after the comment period), this analysis should be included in the PAG project Environmental Assessment (EA).

The remaining projects associated with the military buildup discussed in the DEIS are not anticipated to affect the PAG project. Any cumulative impacts from the JGPO DEIS and the Port of Guam modernization would be entirely from the military buildup since the PAG project will not add additional cargo or other traffic into and out of the Port. Nevertheless, the DEIS does not discuss cumulative effects of their projects (specifically projects numbered 4, 5, 13 and 35 as shown on Figure 2.5-8 of the DEIS) near the Port. Also, the DEIS does not discuss impacts relating to accessing the Port while the JGPO projects are simultaneously under construction with the Port Modernization project.



Finally, it appears that public beaches near the Commercial Port may not have been included in the DEIS. The addition of traffic and construction of JGPO related projects could potentially affect air quality at adjacent locations of frequent human use including public beaches.

Recommendations

The DEIS indicates that significant impact to air quality could occur as a result of the need to increase power generation at existing facilities. These impacts are not discussed in the executive summary. General impacts to air quality on the island of Guam should be included in the summary (Table ES-4).

The DEIS does not indicate how traffic into and out of the Port will be accommodated during the transition of military personnel, equipment and other needs to the island. There is concern that with increased traffic there could be queuing on port property and consequently issues with air quality. However, queuing is not discussed in the DEIS. A general discussion of queuing into and out of the Port should be addressed in the DEIS.

The DEIS also does not discuss cumulative effects from the associated projects and the Port's ability to function efficiently. This is particularly important considering modernization of the Port overlaps with the proposed JGPO projects. An analysis of any anticipated impacts that construction of the JGPO projects will have on the Port's ability to move traffic in and out efficiently should be conducted. Additionally, an analysis of how construction of the JGPO projects while the Port is under construction will affect loading/unloading of JGPO equipment and transportation of cargo should be conducted. It appears that the public beaches near the Port have not been analyzed in the DEIS. Beaches along Route 1 are discussed briefly in the document but there is some concern that beaches specifically near the Port were overlooked. If this is the case, information about these areas should be added in the DEIS.

The DEIS discusses best management practices (BMPs) to minimize affects of the military buildup on Guam. BMPs for air quality are not discussed as part of this effort. BMPs for air quality should be included as part of the DEIS document.

Summary Points

- Impacts to air quality as a result of increase in power generation should be addressed in DEIS executive summary
- DEIS does not address accommodation of traffic into and out of the Port during the overlapping period when the Port reconfiguration, maintenance and repair project will be constructed and the JGPO project will be taking place.
- Increased queuing on Port property due to potential could result in air quality issues and should be evaluated
- Impacts on air quality at the public beaches adjacent to the Port should be ievaluated
- Best management practices (BMPs) for air quality should be included.



Noise Implications

Overview

The DEIS discusses potential noise impacts by different regions on the island. The area of the island discussed in the DEIS that is applicable to the PAG project is referred to as the Apra Harbor area. JGPO projects that have the potential to impact the PAG or add to impacts from the PAG project are as follows:

- Intersection of Route 11 and Route 1 improvements
- Improvements to Route 11
- New diesel power plant adjacent to existing GPA facilities near the PAG

The DEIS indicates that there could be noise impacts on Guam due to additional traffic. These impacts are anticipated to be somewhat temporary during the height of cargo traffic associated with the buildup. However, there could be permanent affects from the increased population on the island and consequent increase in traffic around the island. Generally, the JGPO DEIS regards the Apra Harbor area as having no land uses sensitive to noise. Therefore any addition of traffic, either temporary or permanent, is not anticipated to have an effect on the noise environment of the Apra Harbor area.

Analysis

The DEIS did not discuss the potential impacts from noise on the public beaches near the commercial part of the Port and on the 24-hour security personnel at the Port. The DEIS did not discuss potential noise impacts when the JGPO roadway projects near the Port (i.e. projects numbered 4, 5, 13 and 35 as shown on Figure 2.5-8 of the JGPO DEIS) are planned to be under construction simultaneously with the Port Modernization project. The additive effect of construction equipment on the noise environment could affect the 24-hour security personnel at the Port.

Recommendations

The DEIS does not analyze noise impacts to public beaches near the Port nor does it analyze impacts to 24-hour security at the Port. Analysis of these items should be conducted. Additionally, the DEIS should consider discussing cumulative effects of noise on sensitive areas (i.e. 24-hour security and public beaches) while the JGPO projects (i.e. project numbers 4, 5, 13 and 35) overlap with construction efforts of the Port Modernization project.

Summary Points

- Noise impacts to public beach areas near the Port and on Port 24-hour security personnel should be evaluated.
- Cumulative effects of noise on sensitive receptors during the overlap of construction timeframes from the JGPO project and the Port reconfiguration, maintenance and repairs project should be assessed.



Contaminated Materials Implications

Overview

An overview of contaminated materials affecting locations near the Port was provided. Potential items of concern to the Port include references to the adjacent Power Plant, potential PCB contamination in power poles and the transport of contaminated materials through the Port. Details of the more critical aspects of the contaminated materials review, including consideration whether or not PAG interests regarding contaminated materials are adequately addressed and correctly represented in the DEIS, is provided below.

Analysis

The DEIS suggests potential soil and/or groundwater contamination at the Guam Power Authority (GPA) Cabras Power Plant. In particular, documented site history and site conditions indicate that soil and/or groundwater contamination is likely (refer to Table 17.1-5 in Volume 2, Chapter 17). The table also includes a statement that there was significant non-compliance with former PCB disposal near (GPA) Cabras Power Plant.

PCB fluids for breakers were once used in pole and pad-mounted transformers and capacitors. A field review of power pole and pad-mounted transformers in the Apra Harbor region during inspections of substations and GPA utility buildings indicated that PCB contamination along Route 11 is likely.

The DEIS states that expanded Department of Defense (DoD) missions on Guam would result in an increase in the off-island transport and inter-island transfer of hazardous waste. Hazardous materials usage thresholds in Okinawa suggest similar usage and impacts on Guam following the Marine Corps relocation.

Within the aircraft carrier berthing project description, the DEIS states that accidental releases of petroleum could occur during project-related construction or operations from vehicles, watercraft and equipment which could potentially migrate throughout Apra Harbor. The DEIS describes some best management practices (BMPs) for smaller spills including spill prevention, control and countermeasure plans that will be detailed within stormwater and spill contingency plans.

Recommendations

- Fuel for the new power plant will come through the Port. With the arrival of fuel at the Port, the potential for spills on Port property exists. The DEIS document does not address nor delineate responsibility for cleanup of potential fuel spills on Port property. It is recommended that this be addressed.

The DEIS states that expanded DoD missions on Guam would result in the off-island and inter-island transfer of hazardous waste. It is assumed that this material will be coming through the Port, however, this should be clarified. Similarly, clarification should be determined as to which party is responsible for clean-up and remediation to Port caused by hazardous spills or



other incidents as a result of JGPO project-related hazardous waste.

The DEIS section of the aircraft carrier berthing project briefly describes general BMPs pursuant to Navy response plans regarding small fuel spills on land and in water during construction (including containment booms and deployment of Navy oil response units). However, a statement in the DEIS concludes that larger spills have the potential to migrate within Apra Harbor. It is recommended that more detail regarding larger spill prevention and mitigation be provided.

Summary Points

- It is recommended that delineation of responsibility of potential fuel spills on Port property as a result of power plant fuel transport be addressed.
- Similarly, clarification should be determined as to which party is responsible for clean-up and remediation to Port caused by hazardous spills or other incidents as a result of JGPO project-related hazardous waste.
- It is recommended that more detail regarding larger spill prevention and mitigation be provided in the event of a larger spill in Apra Harbor as a result of the aircraft carrier berthing project.

UXO Implications

Overview

In general, the DEIS describes munitions and explosives of concern (MECs), which includes UXO. A review of the DEIS was conducted to determine if unexploded ordnance (UXO) was identified at locations at or near the Port.

Analysis

According to the DEIS, the Department of Defense (DoD) is coordinating with Guam Environmental Protection Agency (GEPA) to conduct preliminary assessments and site inspections of specific Areas of Concern (AOCs) on the island of Guam in regard to munitions and explosives of concern (MECs).

The description of the aircraft carrier berthing in the DEIS also discusses public injury and/or deaths resulting from UXO encountered on land during construction and in water during dredging operations in Apra Harbor. It states furthermore, that a review of historical records will be performed to assess MECs in the locations where construction or dredging will be conducted. If the records indicate areas of concern, surveys will be conducted to remove MECs.

Additionally, in the DEIS portion of the document which outlines the aircraft carrier berthing, inconsistent information is presented regarding impacts from UXO during construction and operation. Tables 18.2-1 and 18.2-2 in Chapter 18, Volume 4 (aircraft carrier berthing) state that UXO will likely have “no impact” for both Alternatives 1 and 2. However, Table 18.2-3



summarizes UXO impacts for Alternatives 1 and 2 as “less than significant impact”. The general ranking for impacts according to the DEIS is as follows:

- SI = Significant impact,
- SI-M = Significant impact mitigable to less than significant,
- LSI = Less than significant impact,
- NI = No impact,
- BI = Beneficial impact

Since there appears to be a difference between a “no impact” and “less than significant impact” ratings, the discrepancy in UXO impacts for Alternatives 1 and 2 should be clarified.

Recommendations

The report does not specifically address UXO on Port property. However, the possibility of UXO encounters during dredging operations (which are in relative close proximity to Port property) were addressed. Therefore, the locations of in-water AOCs identified by DoD and GEPA might be of interest to the Port.

In general, more information regarding where the DoD and GEPA will be conducting land and/or water site inspections for MECs should be provided in the DEIS. In particular, it is important to understand whether some of the AOCs are located near the Port, as this could potentially affect Port operations.

As mentioned, there appears to be conflicting information presented in three tables. In particular, the “no impact” versus “less than significant impact” discrepancy regarding UXO in the aircraft carrier berthing section of the DEIS documents should be clarified. Although this is a detail that may not directly affect the Port, it is something that should be generally clarified in the DEIS.

PB also recommends that a UXO expert review PB’s findings and the DEIS document.

Summary Points

- The DoD and GEPA Areas of Concern (AOCs) site inspections at or near the Port should be addressed.
- The aircraft carrier berthing section discrepancy between “no impact” versus “less than significant impact” for UXO should be resolved
- UXO expert should review findings in the DEIS document.



Security Implications

Overview

The DEIS document was reviewed with respect to physical security. Overall, the report was quite thorough. However, inconsistencies regarding the level of detail or level of reader-expected understanding with respect to the force protection descriptions were noted.

Analysis

In Volume 1, force protection language is used but not defined. There is an inherent assumption that all readers of the document know what force protection means.

Further in the document, some details regarding force protection are provided, such as set-off distances, fencing and access control. However, this information is not provided consistently with respect to all aspects of all of the alternatives. It was difficult to understand the environmental impact of a specific alternative without a comprehensive list of potential force protection mitigation efforts.

Recommendations

More detail in the document (without divulging too much sensitive security information to the general public) regarding specific mitigation efforts is likely needed. For example, a list of typical force protection responses should be included in the DEIS.

In addition, the DEIS should include discussion about what type of fencing material will be used throughout the proposed developed areas and how high the fencing will be (including barbed wire – or not). For example, the Port utilizes concrete masonry unit (CMU) walls for security. In general, CMU walls are less attractive to tree snakes, last longer than metal mesh, and help withstand the high surf in the area. From an environmental and aesthetic perspective, it is important to understand what type of fencing will be constructed (metal mesh or CMU blocks) and if barbed wire will be included around the proposed developed areas.

The DEIS mentions that the military expansion will impact cultural sites, tourism sites, and commercial shipping, but does not go into any detail about what the security mitigation measures might be. Perhaps the DEIS could share what type of security measures have been used in similar situations. This would provide more context without giving away too many details.

The DEIS mentions many public utilities and services, such as 911 service and libraries and that they are not sufficient for the military expansion. Will this project pay to expand those public utilities and services? Additionally, a statement regarding the power plant adjacent to the Port should be included, including whether or not additional security measures are necessary at the power plant.

In general, more detail including what type of security measures have been used in similar situations should be provided in the DEIS, without requiring a full evaluation of every security risk and specific security mitigation responses.



The Port was designated a Strategic Port in 2009. There will be a wash down area at the Port which will be used to wash down vehicles driven to the Port from the military staging areas before they are loaded onto ships. Additionally, the Port reconfiguration, maintenance and repair project is proposing setting aside the break bulk area for the military whenever they undertake a mission related to the Strategic Port designation. This will close off the break bulk area to commercial operations and impact Port operations. Within the DEIS, there should be a discussion about how JGPO security measures will impact the Port.

Summary Points

- The DEIS should define what force protection measures mean and should be applied consistently.
- Discuss how security measures at the Port will impact the Port.
- Clarify how procedures for missions related to the Port's Strategic Port designation will impact the Port.
- State whether or not additional security measures will be needed at the existing power plant as well as the proposed new power plant adjacent to the Port and whether these measures will affect the Port.

Utilities Implications

Overview

A review of utilities, including power generation, potable water and wastewater systems, solid waste and telecommunications was conducted to determine what was presented regarding the Port of Guam in the DEIS. Details of the utility review are provided in the following sections.

Analysis

As a result of the military buildup in Guam, the potential for increased utility usage is likely. For example, in the Executive Summary the DEIS states that some power generating facilities will have increased use under the preferred alternatives. The DEIS also states that wastewater flow increases from military buildup could result in more issues with wastewater and potable water system limits. In particular, upgrading of sewer capacities might be needed. Impacts to potable water was determined to have a "significant impact mitigable to less than significant impact" for Guam Water Authority (GWA).

It is not clearly presented within the DEIS how increases in power, water and wastewater usage due to the military buildup will potentially affect the adjacent Port or other public areas. However, the DEIS only mentions that the pavement strengthening and improvement projects will affect utilities in Apra Harbor along Route 1 and Route 11, including power, navy power, cable television, fiber optic, GWA and Navy sanitary sewer and water. Some utilities would require relocation due to pavement strengthening. It was not specifically stated



how the projects will affect utilities at the Port and details regarding when and where the utilities would be relocated were not provided.

Recommendations

It is not specifically addressed in the DEIS document what affect the military buildup will have on the adjacent Port (or other public areas). The DEIS should evaluate how utility demands and relocations as a result of the JGPO actions will affect current Port operations as well as future Port modernization including the reconfiguration, maintenance and repair project.

Summary Points

- The DEIS should evaluate how utility demands and relocations as a result of the JGPO actions will affect current Port operations as well as future Port modernization including the reconfiguration, maintenance and repair project.

Visual Impact Implications

Overview

An overview of visual impacts was provided in the DEIS for the viewpoints from Asan Bay Overlook, Cabras Island Scenic Vista, Orote Point Scenic Vista and Mount Chachao Scenic Vista. These viewpoints cover the area that also was reviewed for the Port reconfiguration, maintenance and repair project.

- Asan Bay Overlook: located in the War in Pacific National Historic Park on the southwest coast of Guam, this viewpoint provides a panoramic view of the shoreline.
- Cabras Island Scenic Vista: Cabras Island is a finger-like reef island, which forms the shoreline of Apra Harbor. The viewpoint provides a view of the west coast of Guam
- Orote Point Scenic Vista: located on the westernmost point of Orote Peninsula, the viewpoint provides unobstructed views of the deepwater port to the south.
- Mount Chachao Scenic Vista: one of the designated units in the War in Pacific National Historic Park. Viewpoint from the summit shows and overview of Apra Harbor and Orote Point.

Although substantial changes to the visual environment were noted for specific areas of Guam, the DEIS states that these changes would be expected to be brought to a level of less than significant, with mitigations measures in place.

Analysis

The affected environment discussion in the DEIS is adequate and correct to establish potential environmental consequences such as substantial modification of natural-appearing landscapes located adjacent to public roadways and transforming the relatively open visual



character of some areas into densely developed areas with numerous buildings, roads, parking lots, sidewalks, and landscaping. Viewpoints in common with the Port reconfiguration, maintenance and repair project include the Asan Bay Overlook, Cabras Island Scenic Vista, Orote Point Scenic Vista, and Mount Chachao Scenic Vista. The environmental consequences discussion in the DEIS does not conflict with findings expected for the Port reconfiguration, maintenance and repair project. Issues are adequately addressed and no missing information was noted. The DEIS finding that no significant visual impacts are anticipated in the Apra Harbor area is consistent with the Port's analysis. Additionally, potential mitigation measures are sufficient and do not present adverse issues for the Port reconfiguration, maintenance and repair project.

Recommendations

Information provided in the DEIS concerning visual impacts appears to be consistent with the PAG reconfiguration, maintenance and repair project. Therefore, recommendations for further information or resolution of discrepancies do not appear to be needed.

Summary Points

- Visual impact assessment appears consistent with the Port reconfiguration, maintenance and repair project.

Socioeconomic Implications

Overview

An overview of socioeconomic implications was provided in the DEIS. The analysis covered the following areas:

- Historical and Economic Overview
- Population Characteristics; overall trends and demographics, and military demographics.
- Economic Characteristics: employment by industry, occupational profiles, income profiles, price adjusted income, unemployment, temporary workforce housing, and overview of current GovGuam capacity issues
- Public Services

Analysis

The environmental consequences discussion in the JGPO DEIS does not conflict with findings expected for the Port reconfiguration, maintenance and repair project. Socioeconomic impacts are anticipated to be largely island wide in nature with little difference in effects among the various alternatives analyzed in the DEIS:

- Population impacts: including active-duty Marines, dependents, and rotating transient Marines (about 19,500 people), the proposed actions would add about 65,000



residents to Guam's population in 2014 and a subsequent more stable population of approximately 31, 000 by 2020.

- Economic Impacts: most long-term economic impacts would be beneficial, though the construction boom would entail substantial growing pains related to rapid population influx and housing shortages. These impacts combined with others such as noise and traffic, would substantially impact the quality of life on Guam for several years, until the steady-state military operational phase is in place.
- Public Service Impacts: many public services offered by GovGuam would need to increase professional staff to service the new population. Most of these agencies would need to rapidly expand their services and staff during the 2012-2014 peak, then cut them back as construction ends.
- Sociocultural Impacts: the sociocultural impacts by their nature are complex and would have no single outcome measure. Established patterns of military outreach to Guam's civilian community are likely to minimize the sort of day-to-day irritants that affect the average citizen.
- Significant impacts on environmental justice issues would occur according to the DEIS. However, the PAG reconfiguration, maintenance and repair project is not expected to adversely impact socioeconomics or impact environmental justice and therefore, would result in no additive cumulative impacts.

In general, socioeconomic issues in the DEIS are evaluated in an island-wide context and there is no specific indication or assessment that these issues could be temporarily impacted by actions or impacts at the Port, ie. say by temporary overloading of the cargo handling capabilities of the Port, or temporary disruptions to cargo flow out of the Port when congestion occurs with Port gate work, utilities work in Route 11 ROW, and ongoing work to strengthen Route 11 and make improvements to the Route 11-Route 1 intersection. It is unclear if issues related to cargo flow in and out of the Port would have impacts needing to be evaluated.

Recommendations

Potential mitigation measures identified without a concurrent Port project are sufficient. If the Port Improvement Project is successfully funded and moves forward, the assessment should be expanded to include or rule out cumulative socioeconomic impacts as relates to the Port reconfiguration, maintenance and repair project.

Summary Points

- Information provided on socioeconomics appears to be consistent with post-construction impacts of the Port reconfiguration, maintenance and repair project



- Temporary economic impacts may occur during the period when the Port project moves forward and there are disruptions to Port cargo handling capability and the flow of goods into and out of the Port via the temporarily congested Route 11 and the Route 1-Route 11 intersections.

Historic and Cultural Resources Implications

Overview

The JGPO DEIS discusses cultural resources in Volume 2, Chapter 12, environmental consequences in Volume 4, Chapter 12 and cumulative impacts in Volume 7 Chapter 4. Impacts from connected actions such as roadways and utilities are in Volume 6, Chapter 14.

Analysis

Port interests regarding historic and cultural resources are adequately and correctly represented in the DEIS. No historic properties are identified on Cabras Island, and so no impacts are identified. Moreover, the likelihood of undocumented archaeological resources on Cabras Island is appropriately identified as low. Submerged cultural resources in Apra Harbor are identified, and the proposed actions should have no effect on them.

Regarding cumulative impacts, three Port projects are identified as future actions:

- Commercial Port Improvements (Identified as AH-19 in Table 4.3-1, which identifies a Notice of Availability for a Draft EIS published 8-10-7)
- RFP for construction at the Port (identified as AH-8 in Table 4.3-1).
- Construction and commissioning of facilities, equipment and amenities for “Break Bulk West” (identified as AH-9 in Table 4.3-1)

Project AH-19 is identified as outside the temporal horizon for their cumulative analysis. The JGPO DEIS estimates potential impacts from the remaining two projects (AH-8 and 9 above) and estimates no adverse impacts to cultural resources. Typically, only resources that could be adversely affected by a proposed action are considered for cumulative analyses.

Recommendations

The presentation of the specific JGPO Area of Potential Effects (APE) in Volume 4 Chapter 12 should be clarified. The chapter needs to illustrate the physical and geographical relationship between the JGPO APE, and the Port’s property. The chapter identifies a “proposed channel” on its two figures, but nowhere does it state whether this is the entire APE or not. Known historic properties in Apra Harbor should be clarified on figures and in text to avoid any contradiction in the future. An unidentified red dot is plotted within the proposed channel in Figures 12.2-1 and 12.2-2, which is outside the No Training area. The document should identify this resource and how it is not impacted, if it is within the proposed channel. In the Apra Harbor section of the off-base roadway section, Route 11 on Cabras Island should be changed from a “Medium” probability for encountering undocumented archaeological resources during construction, to a “No/Low” probability area.



Summary Points

- Presentation of JGPO Area of Potential Effects and known historic properties in Apra Harbor should be clarified. The DEIS needs to be specific as to the Area of Potential Effects for each alternative in Chapter 4, and needs to precisely plot locations of known historic properties.
- Route 11 on Cabras Island should be changed from a “Medium” probability for encountering undocumented archaeological resources during construction, to a “No/Low” probability area.

Overall DEIS Review Conclusions & Recommendations

PB’s review of the DEIS found that the document often did not evaluate the potential for impacts of JGPO’s proposed actions on Port operations and facilities. The DEIS is flawed regarding both potential use of the Port property and consideration of effects on Port operation, efficiency, and mission, as well as the economic burden potentially imposed on the Port. It is possible that some portions of the proposed actions could have significant effects on Port operations and access and conflict with the Port’s proposed modernization program.

The JGPO DEIS also did not consider the effects of their proposed actions on the Port’s proposed reconfiguration and maintenance and repair project, ie. the pending ARRA/USDA Port Improvement Project. This is significant because there is overlap between the timeframes of the proposed JGPO project (2010-2020, with peak in 2014) and the Port’s proposed reconfiguration and maintenance and repair project (2010-2013). Furthermore, the DEIS has identified a direct conflict with this project in its discussions concerning the location for a dredged material dewatering facility and proposed the beneficial use of the dredged material resulting from the proposed actions as fill for the Port’s modernization program. The proposed dredged material dewatering facility is located on Port property designated for the location of an expanded container yard, fumigation area, potential helipad for DOD, fencing, DOD access in support of the Strategic Port designation, and new gates, canopies and other supporting terminal infrastructure.

Below is a summary table of the key findings from PB’s review of the DEIS:



**JGPO DEIS REVIEW
SUMMARY OF KEY FINDINGS**

Cargo Forecasts

- Minimizing impacts to marine traffic in Apra Habor and roadway traffic into and out of the Port hinges on the Port being able to modernize its facilities. This itself hinges on the Port being able to obtain sufficient funding for its Phase IA and Phase IB maintenance and repair projects.
- Phase I A funding decisions should be released by February 17, 2010. If funding is sufficient to execute the Phase I A project, cargo handling capability should be significantly improved by 2013. If less than the full amount of Phase I A funding is authorized, the project will need to be redefined and redesigned in order to maximize the benefit of what can be accomplished within available funding.
- Following full or partial funding of the Phase I A project, Phase IB funding in the form of federal grants and appropriations and cargo tariffs will need to be identified. Failure to secure Phase IB funding will put the Port's main wharf structures at increasingly high risk of catastrophic failure in the face of ever increasing cargo throughput and the always present possibility of tsunamis and seismic events.
- The Port's efforts to perform standalone maintenance and repair work in a manner that allows for near-term expanded cargo handling capability mandates that uplands work be performed ahead of critical in-water work. This puts the Port at risk while it attempts to accommodate the cargo impacts of the JGPO projects on Guam.

Use of Port Property

- Proposed power plant at Piti adjacent to Port appears to use property owned by the Port.
- Use of the Route 11 ROW for relocating utilities needs to be coordinated with utility relocations being considered as part of the ARRA/USDA Port Improvement Project
- Proposed location of a dredge dewatering facility on property being used to reconfigure and expand the Port as part of the ARRA/USDA Port Improvement Project presents direct conflict between the projects.

Dredging

- Polaris Point dredging could impede vessel access to the Port.
- Polaris point dredging would cause competition of contractor resources needed for dredging for the Port Modernization Program.
- The Port (Commercial Port Field 1) has been identified as a feasible location for a dredged material dewatering facility. The location in the northeastern portion of the Port directly conflicts with the location of the new gates and other structures and container storage areas proposed for the Port reconfiguration, maintenance and repair project.



- The Port has been identified as a feasible location for the beneficial re-use of dredged material to be used as fill for the Port Modernization Program. Use of the material as fill at the Port may be infeasible due to cost, technical and timeframe reasons.
- Although the 2005 DMMP by Weston found the Port to be a feasible site for a dredged material dewatering facility and beneficial reuse of dredged material it also stated that social impacts from noise and traffic are problematic but that management plans could be developed. These mitigative plans are not included in the DEIS.

Port Projects Included in the Cumulative Effects Analysis

- AH-8 appears to be the Port owners engineer contract held by PB and would in of itself not have impacts and therefore should be deleted from the DEIS.
- Port projects to be conducted under the Port owners engineer contract such as the Port reconfiguration, maintenance and repair project should be included in the DEIS.
- AH-9 and AH-19 appear to be from the Port Master Plan and are not accurately represented.

Ecology

- In the direct vicinity of the Port, in the cove between the glass breakwater facility and fuel facilities and cement area, the DEIS identified a known sea turtle nesting area.
- Other plant and animal species identified by NOAA in the direct vicinity of the Port include sensitive coral, algae, macroalgae, turf algae and bigeye scad fish. The NOAA also identified a coral area of special significance near the Glass Breakwater area. The Port area also was described by Navy studies in 2005 as containing the highest level of zooplankton (it is unclear in comparison to what) and also contains finfish larvae and mollusks.
- Invasive species including the brown tree snake (BTS), flatworms, various insects and some plants may be introduced through increased cargo through the Port potentially impacting the Port and the remainder of Guam. The DEIS does not discuss measures to prevent the introduction of invasive species.
- The marine environment in the vicinity of the Port is characterized as sensitive; containing species of social concern, threatened, endangered, candidate and, in the case of the Spinner dolphin, species of greatest concern. The area also is characterized as containing the highest level of zooplankton and also contains finfish larvae and mollusks. A coral area of special significance was identified near the Glass Breakwater area. The DEIS did not provide the precise location of these species and therefore, the actual occurrence of these species at the Port can not be



determined from the DEIS.

Traffic

- The DEIS should address impacts to Port truck movements (including military shipments) on the roadway network due to construction activity on Routes 1 and 11.
- The DEIS should formally address impacts to Port container movements (including military shipments) due to bridge replacements on Route 1 north and south of Route 11.
- The DEIS should assess the impacts of constructing a new power plant at the Cabras/Piti site since it may have some affect on traffic flow on Route 11.
- Table 2.5-4 is further evidence of overlapping schedules between GRN activities and Port repair and maintenance work. Note Route 1 and 11 improvements shown as being completed in 2011.
- The timing of improvements to Route 11 and the intersection of Route 1/Route 11 shows implementation in 2011. Upgrades to Route 1 north and south of Route 11 are expected in 2013. These coincide and conflict with the Port reconfiguration, maintenance and repair project construction schedule (2010-2013).
- The DEIS states that construction of the GRN improvements “would occur from 2010 to 2016 with peak construction in 2013”. This coincides with the Port’s reconfiguration, maintenance and repair project construction schedule of 2010-2013.
- The level of service (LOS) for the intersection of Route 1 and Route 11 is shown to be at Level E by 2014 during the PM peak hour which indicates heavy congestion and high delays. This high level of congestion may affect commercial truck movements to/from the Port.

Noise

- Noise impacts to public beach areas near the Port and on Port 24-hour security personnel should be evaluated.
- Cumulative effects of noise on sensitive receptors during the overlap of construction timeframes from the JGPO project and the Port reconfiguration, maintenance and repairs project should be assessed.

Air Quality

- Impacts to air quality as a result of increase in power generation should be addressed in DEIS executive summary
- DEIS does not address accommodation of traffic into and out of the Port during the overlapping period when the Port reconfiguration, maintenance and repair project will be constructed and the JGPO project will be taking place.
- Increased queuing on Port property due to potential could result in air quality issues



and should be evaluated

- Impacts on air quality at the public beaches adjacent to the Port should be evaluated
- Best management practices (BMPs) for air quality should be included.

Contaminated Materials

- Likely soil and groundwater contamination between the Port and Route 1 due to Cabras Power Plant's (Piti) history of non-compliance with PCB disposal requirements and utility poles along Route 1 which potentially contain PCB transformer oil. The DEIS does not state the potential for contamination to affect Port property. The DEIS does not state who is responsible for clean-up of potential spills or other releases of contaminated materials from cargo containing contaminated materials on Port property. The DEIS also does not provide specific information on how spills or other releases of contaminated materials on Port property will be prevented.
- It is recommended that delineation of responsibility of potential fuel spills on Port property as a result of power plant fuel transport be addressed.
- Similarly, clarification should be determined as to which party is responsible for clean-up and remediation to Port caused by hazardous spills or other incidents as a result of JGPO project-related hazardous waste.
- It is recommended that more detail regarding larger spill prevention and mitigation be provided in the event of a larger spill in Apra Harbor as a result of the aircraft carrier berthing project.

UXO

- The DoD and GEPA Area of Concern (AOCs) site inspections at or near the Port should be addressed.
- The aircraft carrier berthing section discrepancy between "no impact" versus "less than significant impact" for UXO should be resolved.
- UXO expert should review findings in the DEIS document.

Security

- The DEIS should define what force protection measures mean and should be applied consistently.
- Discuss how security measures at the Port will impact the Port.
- Clarify how procedures for missions related to the Port's Strategic Port designation will impact the Port.
- State whether or not additional security measures will be needed at the existing power plant as well as the proposed new power plant adjacent to the Port and



whether these measures will affect the Port.
<ul style="list-style-type: none">• The DEIS should define what force protection measures mean and should be applied consistently.• Discuss how security measures at the Port will impact the Port.• Clarify how procedures for missions related to the Port’s Strategic Port designation will impact the Port.• State whether or not additional security measures will be needed at the existing power plant as well as the proposed new power plant adjacent to the Port and whether these measures will affect the Port.
Utilities
<ul style="list-style-type: none">• The DEIS should evaluate how utility demands and relocations as a result of the JGPO actions will affect current Port operations as well as future Port modernization including the reconfiguration, maintenance and repair project.
Visual Resources
<ul style="list-style-type: none">• Visual impact assessment appears consistent with the Port reconfiguration, maintenance and repair project.
Socioeconomics
<ul style="list-style-type: none">• Information provided on socioeconomics appears to be consistent with the the Port reconfiguration, maintenance and repair project.
Historic and Cultural Resources
<ul style="list-style-type: none">• Presentation of JGPO Area of Potential Effects and known historic properties in Apra Harbor should be clarified. The DEIS needs to be specific as to the Area of Potential Effects for each alternative in Chapter 4, and needs to precisely plot locations of known historic properties.• Route 11 on Cabras Island should be changed from a “Medium” probability for encountering undocumented archaeological resources during construction, to a “No/Low” probability area.

DEIS
 REVIEW COMMENTS SHEET

No.	Vol	Chpt	Pg	Line, Tbl, Fig	Comment	Commenter (last name)	Agency/Org
1	1	ES	ES-5	Paragraph 2	Force protection and mitigating measures should be described at a lower level so that non security readers of the document understand what is required.	Walsh	PB
2	1	1	1-39	Section 1.9.5	DEIS mentions Ports Subcommittee for Guam Civilian Military Task Force (CMTF) working together on common issues affecting Guam. Inference is military and those affected are communicating.	Peck/Rosenthal	PB
3	1	1	1-45	Table 1.11-1	ODMDS site is 9 nm from Apra Harbor, includes usage by Port projects.	Peck	PB
4	1	2	2-12	Section 2.2.3.1 (Dredging)	One of the scenarios evaluated in the DEIS considers 100% beneficial re-use of the IGPO dredged material for PAG's expansion program. Consider adding additional security measures necessary for public utilities (electricity) and services (such as 911 and roads) that serve the US military needs.	Peck/Rosenthal	PB
5	1	2	2-26	Section 2.6	Consider whether or not the roadways that support the US military need to be constructed in a different manner (beyond DPW and FHWA guidelines) to support the US military's needs.	Walsh	PB
6	1	2	2-27	Section 2.6	DEIS states that aggregate, clean soil, and top soil would be imported from off-island. It is assumed that this material would come through the Port.	Walsh	PB
7	1	2	2-31	Section 2.7.1.4	Basalt would be imported to Guam via ocean transport through the Port.	Peck	PB
8	1	2	2-35	2.7.2.1	DEIS states that grading equipment, trucks, cranes and small equipment would be imported. It is assumed that this equipment will come through the Port.	Peck	PB
9	1	2	2-36	2.7.2.2	Purple area shown on the legend is not visible.	Peck	PB
10	1	3	3-11	Figure 3.3-1	The proposed SDZ location is not clear on the map.	Walsh	PB
11	1	3	3-11	Figure 3.3-1	Describes dredging at Polaris Point.	Walsh	PB
12	1	ES	ES-18			Rosenthal	PB

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 REVIEW COMMENTS SHEET

No.	Vol	Chpt	Pg	Line, Tbl, Fig	Comment	Commenter (last name)	Agency/Org
1	2	2	2-68	Section 2.4.1.1	Biosecurity (invasive species) Plan needed for ACE Beddown project, related to exports and imports. It is assumed this would impact Port. This seems to be one of the few locations in this volume that discusses specific force protection actions. Consider whether more areas/functions should have this level of specificity.	Peck	PB
2	2	2	2-74	Paragraph 1	DEIS states that PAG has prepared a Master Plan with proposed 18 acres of fast land to support new commercial port cargo handling in Apra Harbor. Potential in-water expansion project is an ambitious endeavor that may be confronted with cost, feasibility and ecological concerns and also requires full environmental documentation; up to 1.5 mcy of fill may be needed. Also mentions PAG Navy MOU concerning Navy supply of fill.	Walsh	PB
3	2	2	2-91 and 2-92	Subsection: Dredged Material Disposal	This seems to be one of the few locations in this volume that discusses specific security measures. Consider whether more areas/functions should have this level of specificity.	Peck/Rosenthal	PB
4	2	2	2-103	Paragraphs 1 and 2	This seems to be one of the few locations in this volume that discusses specific force protection actions. Consider whether more areas/functions should have this level of specificity.	Walsh	PB
5	2	2	2-104	Subsection: Proposed Operations	Consider whether the force protection capabilities need to be described.	Walsh	PB
6	2	2	2-109	Section 2.5.2.3	Liquefaction; reports only known occurrence on Guam located at the Port in 1993.	Walsh	PB
7	2	3	3-13	Paragraph 1	DEIS states Apra Harbor is busiest port in Micronesia; it is assumed that PAG is part of this.	Peck	PB
8	2	4	4-43	Section 4.1.4.1	Port Authority Beach is impaired due to bacteria with greater than 10% of samples exceeding Guam Water Quality Standards. This is an environmental characterization of Port property.	Peck	PB
9	2	4	4-43	Paragraph	Under discussion of surface water, DEIS mentions Commercial Port Bridge along Route 11 is at the edge of the 100 year flood zone. Also mentions that most of Apra Harbor is within this zone and that there are no base flood elevation determinations. It is assumed that the Port is included (and this is correct).	Peck	PB
10	2	4	4-54 and 4-55	Subsection: Surface Water			
11	2	4	4-83	Subsection: Non-DoD Land (Construction)	65,000 CY of soil fill imported for range complex. It is assumed that this is through the Port.	Peck	PB
12	2	4	4-129 and 4-130	Section 4.2.8.3	Consider whether the force protection capabilities need to be described.	Walsh	PB
13	2	5	5-3	Paragraph 1	Portion of Guam within a 2.2 mile radius of Power Plant in Piti (i.e. the Port) is within a non-attainment area for SO ₂ air pollution.	Peck	PB
14	2	5	5-23	Entire Page	The DEIS does not analyze queuing on Port property into and out of the gate as a result of an increase in cargo that will occur.	Noel	PB
15	2	5	5-24	Paragraphs 1 and 2	JGPO should analyze the cumulative effects of the Port reconfiguration, maintenance & repair project.	Noel	PB
16	2	6	6-14	Table 6.1-8	JGPO DEIS did not evaluate noise impacts at the public beaches near Route 11 and the Port. Additionally JGPO DEIS did not evaluate noise impacts to the 24-hour security presence at the port.	Noel	PB
17	2	8	8-5	Subsection: Submerged Lands Ownership	Mentions that shipping is addressed in Volume 2, Chapter 14 under Marine Transportation. It is assumed that shipping through the Port would be included.	Peck	PB
18	2	8	8-38	Subsection: Land/Submerged Land Ownership and Management	Mentions that PAG manages some of the submerged lands in Apra Harbor and Commercial Traffic in the Harbor.	Peck	PB
19	2	8	8-42	Subsection: ESQD Arcs	Mentions that Explosive Safety Quantity Distance (ESQD) Arcs may encumber the navigation channel through portions of Hotel Wharf at the Port Authority of Guam.	Peck	PB
20	2	8	8-47	Paragraphs 1 to 3	Route 11 along Commercial Port is to be rehabilitated. Route 11 intersection improvements will also be occurring along with bridge replacements and pavement strengthening along Route 1. Timing of this with Port maintenance and repair and reconfiguration project was not considered. Roadway improvements are planned to major Port access roads (including Route 11 and Route 1). Mentions two-lane roadway rehabilitation project on Route 11 from the Port to Route 1. Intersection improvements will be made to Route 1 and Route 11. Bridge replacements and pavement strengthening will occur along Route 1 and Route 11. It was not clear whether DEIS considered the effect on the Port's maintenance, repair and reconfiguration project.	Rosenthal	PB
21	2	8	8-48	Paragraphs 1 to 3		Peck/Rosenthal	PB

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No.	Vol	Chpt	Pg	Line, Tbl, Fig	Comment	Commenter (last name)	Agency/Org
22	2	8	8-65	Subsection: Beneficial Reuse (Last Bullet)	States that PAG Master Plan includes a proposed 18-acre area for expansion of fast land to support new commercial port cargo handling in Apra Harbor.	Peck	PB
23	2	10	10-61	Figure 10.1-23	Indicates east end of commercial port area is characterized as scrub forest / Identifies vegetation communities on Port Property.	Peck/Sykora	PB
24	2	10	10-63	Table 10.1-20	Indicates there are 7 species of flora/fauna that are listed as threatened, endangered or candidate species at Naval Base Guam.	Sykora	PB
25	2	10	10-64	Figure 10.1-24	Figure indicates sea turtle nesting area near the Port.	Sykora	PB
26	2	10	10-66	Figure 10.1-25	Route 11 roadway improvements at Cabras Island indicate improvements will encroach scrub forest and tangantangan areas; inference is part of this may be on Port property.	Peck/Sykora	PB
27	2	10	10-67	Table 10.1-22	Indicates there is one endangered bird species (Mariana common moorhen) within Apra Harbor region BRSA for proposed GRN project.	Sykora	PB
28	2	10	10-80 and 10-81	Section 10.2.1.3 (Bullets)	Identifies potential harm to fragile ecosystems on Guam from the introduction of invasive species due to increased traffic among the islands from the movement of personnel and materials. It is inferred that materials would move through the Port.	Peck/Sykora	PB
29	2	10	10-80 and 10-82	Section 10.2.1.3 (Bullets)	States that existing control and containment activities at air and sea ports for BTS are insufficient to deal with the risk associated with the increased cargo and personnel movement from Guam to other vulnerable destinations. Inference is that this is an issue for Port exports.	Peck	PB
30	2	10	10-126	Paragraph 1	Discusses accidental transfer of invasive species on Guam and other islands due to shipment of supplies, equipment and household goods. Inference is some would move through the Port.	Peck	PB
31	2	10	10-136 and 10-137	Subsection: Invasive Species Avoidance, Minimization and Control (Bullets 5 and 6)	Navy would notify the point of destination port in the event of DOD-related vehicles and equipment leaving Guam without inspection by USDA and Wildlife Service. Inference is that some of this could be shipped through Port.	Peck	PB
32	2	10	10-137 to 10-139	Subsection: Invasive Species Avoidance, Minimization and Control (Bullets)	States the need for a comprehensive approach to control invasive species exports, imports, and spread. Inference is that some of these goods would go through the Port.	Peck/Sykora	PB
33	2	11	11-42	Fig 11.1-11	Indicates sensitive coral, coralline algae, macroalgae and turf algae benthic habitats and potential sea turtle nesting areas and bigeye scad fish surrounding the Port. Also, coral area of special significance is near the glass breakwater.	Peck/Sykora	PB
34	2	11	11-43	Paragraph 6	All of Apra Harbor is designated an Essential Fish Habitat (EFH).	Sykora	PB
35	2	11	11-43	Paragraph 7	The Port area contains highest level of zooplankton; other organisms include finfish larvae, decapod zoeae and pteropodes (mollusks).	Peck/Sykora	PB
36	2	11	11-44	Paragraph 3	Threatened green sea turtle and endangered hawksbill sea turtle are special-status species reported in Apra Harbor.	Sykora	PB
37	2	11	11-51	Paragraph 1	Mentions Route 11 roadway improvements would impact Port traffic.	Peck	PB
38	2	11	11-67	Subsection: Outer Apra Harbor	Less than significant impact to marine flora, fauna, invertebrates and EFH for Alternative 1.	Sykora	PB
39	2	11	11-69	Figure 11.2-3	Mentions sea turtle nesting near Port.	Peck	PB
40	2	11	11-71	Subsection: Operations	Mentions that Increased ship traffic may disturb organisms living in upper water column.	Sykora	PB
41	2	11	11-71	Subsection: Non-Native Species	Discusses Regional Biosecurity Plan and Risk Analysis for terrestrial and marine biosecurity for commerce to Micronesia through Ports. Inference is PAG is a player in this.	Peck	PB
42	2	11	11-73	Paragraph 1	Dredged material disposal options include fill for the PAG expansion program.	Peck/Rosenthal	PB
43	2	11	11-88	Table 11.2-13	Mentions that Navy determined no adverse affect on EFH during construction and operation for Apra Harbor.	Sykora	PB
44	2	12	12-49	Paragraph 2	Unclear what kind of Navy procedures must be followed to obtain access to Pagat Cave. Unclear whether security measures be added to Pagat Cave.	Walsh	PB

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No.	Vol	Chpt	Pg	Line, Tbl, Fig	Comment	Commenter (last name)	Agency/Org
45	2	13	13-45 through 13-55	All Pages	General observations: The affected environment discussion is adequate and correct. Viewpoints in common with Port project include the Asan Bay Overlook, Cabras Island Scenic Vista, Orote Point Scenic Vista, and Mount Chachao Scenic Vista (Figure 13.1.1-1). Identifies existing visual quality in the Route 1/11 intersection in the Port area. Characterizes it as moderate to moderately low in industrial environment; not considered a big issue.	Stewart	PB
46	2	13	13-54	Table 13.1-13	General observations: The environmental consequences discussion does not conflict with findings expected for the Port project. Issues are adequately addressed and no missing information was noted. Agree with finding that no significant impacts are anticipated in the Apra Harbor area.	Peck	PB
47	2	13	13-70, 13-73; 13-76, 13-79	Table 13.2-1; 13.2-2; 13.3-5	General observations: Potential mitigation measures are sufficient and do not present adverse issues for the Port project. Describes the affected environment at the Port.	Stewart	PB
48	2	13	13-83	Entire Page		Stewart	PB
49	2	14	14-1	Section 14.1.1 Subsection: Commercial Port		Peck	PB
50	2	14	14-2	Facilities	Provides a description of Port facilities.	Peck	PB
51	2	14	14-3 and 14-4	Table 14.1-1	Describes vessel traffic in terms of types, Port visits, inter-island shipping, ship rotations, and cargo. Provides history of vessel calls from 1995 through 2008.	Peck	PB
52	2	14	14-3	Paragraph 3	Discusses recreational vessel capacity of marinas, aquaworld and harbor of refuge. Does not state any impacts. Equivocates on number of vessels and impacts as relates to impacts on marine transportation by stating: If the maximum annual number of vessels that would visit the harbor during the embarkation period exceeds the annual maximum since 1995, then a significant impact to marine transportation may occur. If the maximum annual number of vessels that would visit the harbor during the embarkation period is equal to or less than the annual maximum number of vessels since 1995, then there would be a less than significant impact to marine transportation. Overall, does not address any potential impacts.	Peck	PB
53	2	14	14-7	Paragraph 1 Subsection:		Peck	PB
54	2	14	14-8	Construction	Number of vessel trips to the Port during construction (127 for dredge transport).	Rosenthal	PB
55	2	14	14-8	Section 14.2.2.3	States an expectation of no impacts on marine transportation in Apra Harbor.	Peck	PB
56	2	14	14-8	Section 14.2.2.4	Identifies an addition of 127 vessel trips to transport dredge material with less than significant impact on marine transportation in Apra Harbor.	Peck	PB
57	2	14	14-9	Paragraph 4	Number of container vessels projected during operation is 124 each year between 1995 and 2008.	Rosenthal	PB
58	2	14	14-9	Table 14.2-1	Projects container traffic 2008 through 2018 and identifies Port as the source of the statistics. Includes commercial and military containers. Projects an average of 156,636 containers per year during embarkation with a peak of 190,000 in 2015. The projected average number of containers is double the average number of containers from 1995 to 2008 but DEIS states less than double number of ships due to increasing vessel capacity. This ignores vessel capacity constraints due to existing dredge depths.	Peck/Rosenthal	PB
59	2	14	14-9	Table 14.2-1	Military container movements increase significantly through the Port of Guam repair and maintenance construction period (2010-2013). States that due to decline in vessels visiting the Port since 1995, the number of visits of amphibious vessels and combatant ships to Apra Harbor will have less than significant impact on marine transportation in the harbor.	Lo	PB
60	2	14	14-9	Paragraph 2	JGPO DEIS statement "Not expected there would be twice as many visits by container ships to the Port of Guam during embarkation period because the capacity of container ships has been increasing". Statement does not take into account that vessels need to lighter to enter the Port and therefore, there may not be sufficient draft for vessels to navigate.	Peck	PB
61	2	14	14-9	Paragraph 4	Projects no increase in military vessel traffic to Port and declining or level non-military vessel traffic to Port.	Rosenthal	PB
62	2	14	14-17	Paragraph 1	States declining vessel traffic from 1995 to 2008. Indicates projected increased traffic from 2010 through 2017 including container shipments with vessel traffic highs less than that experienced in 1995. Indicates that marine traffic associated with operations and construction would have Less Than Significant Impacts (LSI) on marine transportation in Apra Harbor.	Peck	PB
63	2	14	14-18 16-1 through	Paragraph 1	General observations: the affected environment discussion clearly characterizes the demographic and employment characteristics of Guam including the Naval Base and Port area, which is identified as "Central".	Stewart	PB
64	2	16	16-36	All Pages	Proposed action would generate more demands on Guam for roads, ports, sewer, water, power, and other necessary infrastructure. This impacts all services users on Guam.	Peck	PB
65	2	16	16-3	Last paragraph		Peck	PB

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No.	Vol	Chpt	Pg	Lines, Tbl, Fig	Comment	Commenter (last name)	Agency/Org
66	2	16	16-37 through 16-99	Table 16.2-52	General observations: the environmental consequences discussion does not conflict with findings expected for the Port project. Issues are adequately addressed and no missing information was noted. As noted, socioeconomic impacts would be island wide in nature with little difference in effects among the various alternatives. As noted, significant impacts on environmental justice issues would occur. However, the Port project is not expected to impact environmental justice and therefore there would be no additive cumulative impacts.	Stewart	PB
67	2	16	16-79	Subsection: Regional Issues	Regional responsibilities of GFD and GPD related to public safety, such as storage of hazardous materials at the Port Authority would affect the number of additional staff that might need to be added.	Peck	PB
68	2	16	16-83	Entire Page	Will this military relocation program include upgrading local Guam facilities such as the 911, library, judiciary, beaches and recreational facilities? States that under the no-build alternative, agencies planning infrastructure development such as at the Port, would have more time to achieve their overall objectives. Inference is that the converse applies if the development moves forward.	Walsh	PB
69	2	16	16-98	Section 16.2.4	General observations: Potential mitigation measures are sufficient and do not present adverse issues for the Port project.	Peck	PB
70	2	16	Table 16.2-53		Appears that Glass Breakwater is outlined in the figure as a military installation. Unclear how this is important or relevant to hazardous material /waste and/or UXO.	Stewart	PB
71	2	17	17-19	Figure 17.1-5	According to IGPO, DoD is coordinating with GEPA to conduct preliminary assessments and site inspections of Areas of Concern (AOCs) on Guam in regard to munitions and explosives of concern (MECs). This includes Naval Base in Guam. If anything is identified in the water, might potentially affect the Port.	Sykora	PB
72	2	17	17-25	Figure 17.1-11		Sykora	PB
73	2	17	17-34	Table 17.1-5	Table address potentially contaminated sites near Power Plant along Route 11 between the Port and Route 1. Suggestion of potential soil and groundwater contamination adjacent to the Power Plant. Suggestion of potential PCB contamination in power poles along Route 11.	Peck/Sykora	PB
74	2	17	17-41	Table 17.2-4	Expanded DoD missions on Guam would result in an increase in the off-island transport and inter-island transfer of hazardous waste. Hazardous materials usage thresholds in Okinawa suggest similar usage and impacts to Guam following the relocation.	Peck/Sykora	PB
75	2	17	43	Table 17.2-5 and Table 17.2-6	Discussion of construction-related impacts for hazardous material handling on Guam. Inference is that some of this material will pass through the Port.	Peck/Sykora	PB
76	2	20	20-10	Last line	Port Master Plan cited as a reference for Land and Submerged Land Use.	Peck	PB
77	2	20	20-28	Last line	Port Master Plan cited as a reference for Marine Transportation.	Peck	PB

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No.	Vol	Chpt	Pg	Line, Tbl, Fig	Comment	Commenter (last name)	Agency/Org
1	3	18	18-2		Explain how access control relates to environmental circumstances	Walsh	PB

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No.	Vol	Chpt	Pg	Line, Tbl, Fig	Comment	Commenter (last name)	Agency/Org
1	4	2	2-32	Subsection: Security/Biosecurity	First paragraph under Security/Biosecurity describes fences. Level of detail should be carried throughout the document for different areas/functions being considered.	Walsh	PB
2	4	10	10-6	Paragraph 3	Accidental releases of petroleum that could migrate within Apra Harbor.	Sykora	PB
3	4	10	10-12	Bullet 1	Implied that invasive species enter through Port shipment of supplies and equipment.	Sykora	PB
4	4	11	11-37	Table 11.1-5	Spinner dolphin is listed as species of greatest conservation need, noted on regular basis in Apra Harbor. General observations: Aircraft berthing would occur in Apra Harbor. Although some new elements would be introduced into the existing landscape and others would be removed, the result would be no significant impact. The environmental consequences discussion does not conflict with findings expected for the Port project. Issues are adequately addressed and no missing information was noted. Agree with finding that no significant impacts are anticipated in the Apra Harbor area.	Sykora	PB
5	4	13	13-4	Table 13.2-3	Types of tourism restrictions that would be enacted during carrier ingress and egress should be addressed.	Stewart	PB
6	4	16	16-10	Paragraph 2	General observations: The environmental consequences discussion does not conflict with findings expected for the Port project. Issues are adequately addressed and no missing information was noted. Socioeconomic impacts would range from significant but mitigatable, to beneficial. The Port project is not expected to adversely impact socioeconomic or environmental justice; therefore, there would be no additive cumulative impacts.	Walsh	PB
7	4	16	16-18	Table 16.2-23		Stewart	PB
8	4	18	18-7	Section 18.2.2.5	Discussion of death or injury to public could result if UXO encountered on land during construction and in water during dredging operations in Apra Harbor. Review of historical records will be performed; surveys will be conducted to remove munitions and explosives of concern (MECs) if records indicate necessity. Depending upon where UXO is located, this could potentially affect the Port area and access to the Port.	Sykora	PB
9	4	18	18-11 and 18-12	Tables 18.2-1, 18.2-2 & 18.2-3	Appears to be inconsistent information in tables. Tables 18.2-1 and 18.2-2 indicate no impacts during construction and operation from UXO. However, Table 18.2-3 indicates "less than significant impact" from UXO.	Sykora	PB

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No.	Vol	Chpt	Pg	Line, Tbl, Fig	Comment	Commenter (last name)	Agency/Org
1	5	2	2-5	Section 2.3.2.2	Types of physical measures that are necessary to meet the munitions storage force protection requirements should be provided.	Walsh	PB
2	5	2	2-7	Figure 2.3-1	Unclear how the decision will be made as to security requirements for historic properties and when the military interests will supersede cultural and historic interests.	Walsh	PB
3	5	12	12-2	Section 12.2.1.2	General observations: Construction of the AMDTF would be short term in duration and result in minimal impacts, both construction and operation. The visual setting for the port project would not be affected by this construction. The environmental consequences discussion does not conflict with findings expected for the Port project. Issues are adequately addressed and no missing information was noted. Agree with finding that no impacts to visual resources would occur.	Walsh	PB
4	5	13	13-7	Table 13.2-1	General observations: for the AMDTF, the environmental consequences discussion does not conflict with findings expected for the Port project. Issues are adequately addressed and no missing information was noted. Socioeconomic impacts would range from less than significant to beneficial. The Port project is not expected to adversely impact socioeconomic or environmental justice; therefore, there would be no additive cumulative impacts.	Stewart	PB
5	5	16	16-19	Table 16.2-22		Stewart	PB

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No.	Vol	Chpt	Pg	Line, Tbl, Fig	Comment	Commenter (last name)	Agency/Org
1	6	1	1-39		Military buildup would cause an increased demand for imported goods and materials (especially construction supplies, equipment and materials) that would be shipped through the Port. It would also be required to support the construction workers and induced population increase. Indicates that many areas of the Port are at capacity or unusable. Also indicates that the Port had plans to expand and make improvements prior to the news of the military relocation but that the relocation adds impetus to implement improvements and service the increased construction and population.	Peck	PB
2	6	2	2-107	Last Paragraph	States that the structural integrity of the Commercial Port Bridge was not evaluated because it is a culvert. Therefore, within the document we are essentially lead to believe that we don't know its capacity to handle the increased traffic loads associated with the buildup.	Peck	PB
3	6	2	2-108	Figure 2.5-1	Identifies bridges impacted by hauling cargo from the Port to points throughout the island. Inference is increased and heavier cargo is coming through the Port.	Peck	PB
4	6	2	2-109	Paragraph 2	Discusses roadways with widening requirements due to increased traffic and preference for use as haul routes for trucks handling cargo hauled from the Port to points north on the island. Inference is increased and heavier cargo coming through the Port.	Peck	PB
5	6	2	2-110	Figure 2.5-2	Maps preferred truck hauling routes leading away from the Port. Inference of increased and heavier cargo coming through the Port.	Peck	PB
6	6	2	2-115	Section 2.5.1.7	Discusses the Guam Road Network containing logistical routes for construction-related transport connecting the Port of Guam with Navy and Air Force bases, the Finegayan area, the Naval Munitions Site, concrete batch plants, rock quarries and precast concrete panel fabrication sites associated with the military buildup on the island. Inference is key role the Port plays in the logistical support infrastructure and as a point of origin in the Guam Road Network.	Peck	PB
7	6	2	2-120	Table 2.5-3	Guam Roadway Network (GRN) improvements No. 13 and No. 14 call for pavement strengthening of Route 1 near Routes 11 and 6 which may disrupt commercial and construction-related truck movements into and out of Port facilities.	Lo	PB
8	6	2	2-122	Table 2.5-3	GRN No. 4 and No. 5 would involve pavement strengthening of Route 11 from Route 1 to the Port entrance and intersection improvements at Route 1/Route 11, respectively. These activities may coincide with Port repair and maintenance work, hence affecting congestion.	Lo	PB
9	6	2	2-122	Table 2.5-3	Table identifying the Route 11 paving strengthening and Route 1/11 intersection improvements projects. This is to handle more and heavier cargo passing through the Port.	Peck	PB
10	6	2	2-123	Figure 2.5-8	Timing of GRN improvements is shown. Improvements to Route 11 and to the intersection of Route 1/Route 11 are slated for 2011. Upgrades to Route 1 north and south of Route 11 are expected in 2013. These coincide and conflict with the Port repair and maintenance project	Lo	PB
11	6	2	2-124	Section 2.5.1.8	First paragraph states that construction of the GRN improvements "would occur from 2010 to 2016 with peak construction 2013". This coincides with the Port's repair and maintenance schedule of 2010-2013.	Lo	PB
12	6	2	2-124	Table 2.5-4	Further evidence of overlapping schedules between GRN activities and Port repair and maintenance work. Note Route 1 and 11 improvements shown as being completed in 2011.	Lo	PB
13	6	3	3-9	Figure 3.1-3	States that the Navy owns potable water systems in the Port.	Sykora	PB
14	6	3	3-15 to 3-17	All Pages	Wastewater flow increases from military buildup could result in more issues with wastewater and potable water system limits.	Sykora	PB
15	6	4	4-27	All Pages Listed	There are references to Route 11 level of service on pages 27, 81, 107, 137, 153 and 165.	Peck	PB
16	6	4	4-28	All Pages Listed	There are references to Route 11 congestion on pages 28, 29, 76, 77, 78, 79, 80, 107-111, 133-136, 149-150, 155, and 161-162.	Peck	PB
17	6	4	4-39	Bullets	Points to construction and population peaks in 2014. Infers cargo demand peak in same timeframe.	Peck	PB
18	6	4	4-41	Figure 4.2-1	Island population increases significantly during Port of Guam repair and maintenance construction period (2010-2013).	Lo	PB
19	6	4	4-66	Table 4.2-5	Route 1 volume-to-capacity (V/C) ratio would exceed 1.00 in Tanmuning by 2014 which is an area where Port of Guam trucks (commercial and construction related) pass through. Relates to Alternatives 1 and 2.	Lo	PB
20	6	4	4-70	Figure 4.2-20	Similar to above - Route 1 V/C ratio is shown to be greater than 1.0 by 2014 (in fact > 1.15) which may affect Port truck movements.	Lo	PB
21	6	4	4-81	Table 4.2-10	Level of Service (LOS) for intersection of Route 1 and Route 11 is shown to be at "E" by 2014 during the PM peak hour. This high level of congestion may affect commercial truck movements to/from the Port of Guam	Lo	PB
22	6	4	4-107	Table 4.2-18	Same as above, LOS for Route 1/Route 11 is shown to be at "E" by 2014 for the PM peak hour. Such high level of congestion could influence truck movement efficiency.	Lo	PB
23	6	4	4-128	Figure 4.2-52	Similar to Comment #3 where V/C ratio is shown to be greater than 1.0 by 2014 during the PM peak hour for (Alternative 8). May affect truck movements to/from the Port of Guam.	Lo	PB
24	6	7	7-9	Paragraph 4	JGPO should analyze the cumulative effects of the Port reconfiguration, maintenance and repair project.	Noel	PB

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No.	Vol	Chpt	Pg	Line, Tbl, Fig	Comment	Commenter (last name)	Agency/Org
25	6	7	7-36	Subsection: Apra Harbor	The JGPO DEIS does not analyze queuing on Port property into and out of the gate as a result of an increase in cargo that will occur. JGPO DEIS did not evaluate noise impacts at the public beaches near Rte. 11 and the Port. Additionally JGPO DEIS did not evaluate noise impacts to the 24-hour security presence at the Port.	Noel	PB
26	6	8	8-1	Line 11	General observations: Utilities and off base roadways construction would occur within the same general timeframe as the Port project and it is anticipated that viewers on the island would notice a rapid increase in urbanization. The anticipated changes to the visual environment in the Apra Harbor area would be minimal. This expected result does not conflict with findings expected for the Port project. Issues are adequately addressed and no missing information was noted.	Noel	PB
27	6	15	15-24	Table 15.2-9	General observations: The environmental consequences discussion does not conflict with the findings expected for the Port project. Issues are adequately addressed and no missing information was noted. Socioeconomic impacts would range from significant to beneficial. However, the Port project is not expected to adversely impact socioeconomics or environmental justice and therefore there would be no additive cumulative impacts.	Stewart	PB
28	6	17	17-13 17-15 and 17-29 through 17-30	Table 17.2-17		Stewart	PB
29	6	17	30	Table 17.2-18 and Table 17.2-35	General observations: Potential mitigation measures are sufficient and do not present adverse issues for the Port project.	Stewart	PB

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No.	Vol	Chpt	Pg	Line, Tbl, Fig	Comment	Commenter (last name)	Agency/Org
1	7	2	2-2	Table 2.1-1	Item 13: States that surveys will be conducted to identify and remove ordinance from the work site, previously in Volume 4 it was stated that surveys will be conducted only if review indicated a necessity. The table does not indicate BMP 8 to minimize affects to AQ. If there are BMP's to minimize potential affects to AQ suggest adding these to the table.	Sykora	PB
2	7	2	2-2	Table 2.1-1	Type of navigational restrictions that will be in place during aircraft carrier transits should be addressed.	Noel	PB
3	7	3	3-47	Entire Page	States that established SOPs implemented prior to construction would mitigate the impact from UXO to "less than significant".	Walsh	PB
4	7	3	3-70	Section 3.3.17.1	Port maintenance, repair and reconfiguration project is not included in the cumulative effects analysis and logistics.	Sykora	PB
5	7	4	entire table	Table 4.3-1	General observations: the cumulative impacts discussion does not conflict with findings expected for the Port project. Issues are adequately addressed and no missing information was noted. Agree with finding that overall, impacts on visual resources would be minor and no significant impacts are anticipated in the Apra Harbor area.	Rosenthal	PB
6	7	4	4-25	Entire Page	General observations: Chapter 4 notes that the socioeconomic impacts of the preferred alternatives would have a strong additive impact on the cumulative projects impact and it is the influx of population to support the preferred alternative that triggers the socioeconomic impacts. However most of the cumulative projects, including the Port project are not expected to be growth inducing. The Port project is not expected to adversely impact socioeconomics or environmental justice and therefore it would not create additive cumulative impacts. The cumulative impacts discussion does not conflict with findings expected for the Port project. Issues are adequately addressed and no missing information was noted.	Stewart	PB
7	7	4	4-20 through 4-25	All Pages		Stewart	PB
8	7	4	4-10	Table 4.3-1	AH-8- owner/agent for construction of the Guam Commercial Port project, construction timeframe 2009-2013, is retained for the cumulative impacts analysis. Lead agency/proponent is PAG & point of contact is GovGuam.	Rosenthal	PB
9	7	4	4-10	Table 4.3-1	AH-9 - construction and commissioning of the facilities, equipment and amenities (\$195 million) that are required to implement the preferred concept "Break-Bulk West" in order to meet minimum requirements of the military buildup construction logistics requirements. Construction timeframe is 2009-2013 and project is retained in cumulative impacts analysis. Lead agency/proponent is PAG and the point of contact at lead agency is MARAD/GovGuam.	Rosenthal	PB
10	7	4	4-11	Table 4.3-1	AH-19- construct new wharf east of Hotel Wharf to accommodate deep-draft container vessels and cruise ships. Dredging and filling of GovGuam submerged lands required. Construction timeframe is 2021-2025 and the project was not included in the cumulative effects analysis.	Rosenthal	PB

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No.	Vol	Chpt	Pg	Line, Tbl, Fig	Comment	Commenter (last name)	Agency/Org
					NONE		

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No.	Vol	Chpt	Pg	Line, Tbl, Fig	Comment	Commenter (last name)	Agency/Org
1	ES	ES	ES-35	Table ES-4	The JGPO DEIS indicates that significant affects to AQ could occur at some existing power generating facilities due to increased use under the preferred alternative. Suggest adding AQ impacts and potential mitigation measures to the summary table.	Noel	PB

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No.	Vol	Chpt	Pg	Line,Tbl, Fig	Comment	Commenter (last name)	Agency/Org
1	Appendix I				The IGPO DEIS states that the addition of a new power plant near the Port (Pti) is assumed to be a significant source of air pollution which will be able to be mitigated. Nevertheless detailed analysis has not been conducted. There are security guards at the entrance to the fuel tank facility which are considered sensitive receptors for air quality and noise.	Noel	PB
2	Appendix A		20 of pdf	Federal, State, Local Agencies	Joseph Duenas, Acting General Manager for PAG, attended the Public Scoping Mtg in April 2007	Rosenthal	PB
3	Appendix K		279 of pdf	ES-1	Commercial Port (identified as Field 1) cited in 2008 Weston Solutions Final Report Dredged Material Upland Placement Study as a feasible location for a dewatering facility for dredged material. Facility located in northeastern portion of port extending into paved container area.	Rosenthal	PB
4	Appendix K		321 of pdf	Chapter 3.2.3	Discusses Commercial Port Field 1 as a Confined Upland Dewatering Site. Can accommodate 573,459 cy of dredged material.	Rosenthal	PB
5	Appendix K		322 of pdf	Figure 12	Commercial Port Field 1 Confined Upland Dewatering Site	Rosenthal	PB
			42 of document;32				
6	Appendix K		3 of pdf		States Navy and Gov Guam signed an MOU for the use of dm appropriate for fill and to establish procedures for use of material as fill by PAG. States facility will facilitate the use of dm for the Port expansion. DM will be brought to Port in sealed trucks.	Rosenthal	PB
			32 of document;31				
7	Appendix K		3 of pdf	Table 5	Construction Cost of Dewatering Facility at Port - \$22,191,271	Rosenthal	PB
8	Appendix K		42 of document		Port site identified as feasible in 2005 DMMP by Weston. Characterized existing conditions & noise, air quality & odor impacts. States social impacts from noise and traffic are problematic but management plans could be developed and therefore, location is feasible.	Rosenthal	PB
			64 of document				
9	Appendix K				States a concept sketch of the port expansion was provided by PAG during Weston's Dec.2003 site visit. There is no table of contents for each subject/section forcing someone to page through thousands of pages to see what the contents are. The firms and individuals who prepared the reports are not listed as preparers in the DEIS even though the information was used to determine impacts of the IGPO project.	Rosenthal	PB
10	Appendix K					Rosenthal	PB

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No.	Vol	Chpt	Pg	Line, Tab, Fig	Comment	Commenter (last name)	Agency/Org
1	General Observation				Portions of JGPO project evaluated in the DEIS may be awaiting funding.	Rosenthal	PB
2	General Observation	in FAQs on website		http://www.guamdeis.us/about/faq/roadway	The preferred alternative evaluated in the JGPO DEIS may not be the preferred alternative implemented. The final selection of the alternative to be implemented will be made in the ROD.	Rosenthal	PB
3	General Observation				Construction schedule beginning in 2010 appears overly optimistic (i.e. to begin shortly after the ROD in late summer 2010).	Rosenthal	PB
4	General Observation				Aircraft carrier berthing - deep draft air carrier wharf; Polaris Point dredging will create competition for available resources, have potential cumulative effects on marine environmental resources for non-JGPO projects that require dredging or significant marine construction within the same ecosystem; and could potentially affect vessels which are trying to navigate into the Port.	Rosenthal	PB
5	General Observation				New power plant proposed at Piti adjacent to the Port proposed as a long-term alternative. An impact analysis has not been conducted. Property appears to be owned by PAG.	Rosenthal	PB
6	General Observation				Coral aggregate will be coming into the Port. The JGPO DEIS does not state who will be conducting security screenings on the aggregate or address how the incoming aggregate could affect normally occurring Port operations and the proposed Port reconfiguration and maintenance and repair project.	Rosenthal	PB
7	General Observation				The JGPO DEIS states that dredged material from dredging at Polaris Point could be removed by Gov Guam including PAG.	Rosenthal	PB
8	General Observation				The JGPO DEIS states that the PAG expansion plan may not be feasible.	Rosenthal	PB
9	General Observation				Fuel for the power plants will arrive at the Port. This creates the potential for spills on port property. Document does not address this or delineate responsibility for clean-up.	Rosenthal	PB
10	General Observation				JGPO DEIS states that construction will be 2010-2020, with peak in 2014. Port EA assumes construction is 2010 to 2013.	Rosenthal	PB
11	General Observation				JGPO DEIS states roadway improvements planned to major Port access roads Route 11 and Route 1; all roadway work will take place between 2011 to 2016; no specifics given.	Rosenthal	PB
12	General Observation				Preferred alternative in the JGPO DEIS may not be final alternative implemented. Procedurally, the Port EA can only consider the preferred alternative as stated in the JGPO DEIS when evaluating cumulative impacts between the projects.	Rosenthal	PB
13	General Observation				The DEIS does not address how Port construction for the maintenance and repair project and normal operations will be carried out while JGPO construction is ongoing.	Rosenthal	PB
14	General Observation				The DEIS does not address how JGPO roadway construction will affect construction vehicle (for maintenance and repair project) and regular vehicle access to the Port.	Rosenthal	PB
15	General Observation				The DEIS does not adequately address the handling of increases in cargo related to construction of JGPO's action while simultaneously constructing the Port.	Rosenthal	PB
16	General Observation				There is significant mention of issues having potential impacts to the Port. Many of these relate to the volume, weight, and type (in some cases contaminated or potentially contaminated) of cargo shipments. There is the absence of an assessment of how the port will handle the cargo when it loses capacity while replacing the waterfront (bulkhead) structures and performing dredging. There is the absence of a cumulative impacts assessment between the JGPO projects and the Port's project. The Port project is incorrectly characterized, i.e. they are referring to the Overall Modernization Program in the Master Plan rather than only announced (but currently unfunded) project (Maintenance and Repair Project). There is no assessment of the disruption to marine traffic destined for the Port during their 6-18 month period of dredging a 600 ft wide channel through Apra Harbor. There is enough discussion about biohazards and invasive species to signal that the Port will have to contend with changed and increased levels of scrutiny and responsibility when dealing with the influx of cargo impacting these issues. There is no assessment of traffic impacts to the Port when Route 11 and Route 11/1 intersection work takes place. There is no apparent assessment of how the competition for resources could affect workforce availability, the price of labor, and the price of materials for our respective projects.	Peck	PB