

February 15, 2010

Attention: GPMO
JGPO c/o NAVFAC Pacific
258 Makalapa Drive, Suite 100
Pearl Harbor, HI 96860-3134

As a native of Guam and a member of the We Are Guahan Coalition, the DEIS for the Guam and CNMI military relocation of U.S. Marines from Okinawa, the Apra Harbor dredging and construction associated for the Visiting Aircraft Carrier Berthing, and the Army Air and Missile Defense Task Force is troubling to the future survival of our people because it threatens the ecosystem and resources upon which we depend. Specifically, it does not adequately address the following, regarding the current and future state of Guam's water resources:

- 1) The sustainable yield of 80.5 million gallons per day, referred to in Chapter 2 of the DEIS, is based on a study that is 19 years old. How can we be assured that the sustainable yield in Northern Guam Lens Aquifer (NGLA) that is based on the old methodology is still accurate today? In specific terms, how is the sustainable yield defined and determined?
- 2) Do the methodologies used in determining sustainable yield of the Northern Guam Lens Aquifer definitively show that the current climate of global warming and rising sea levels has no effect on the quantity and quality of water resources?
- 3) What level of salt concentration in the water extracted from the Northern Guam Lens Aquifer is used to define the sustainable yield?
- 4) To what extent has the sustainable yield diminished due to the increased development over the Northern Guam Lens Aquifer (NGLA)? How has the increase of impervious surfaces impacted the rate of recharge of the NGLA? Which scientific studies have been completed to determine if the recharge rate has been affected? What are the scientific limitations in these studies?
- 5) Is the Northern Guam Lens Aquifer divided into distinct and separate subbasins? Or are these subbasins connected hydrologically? How are the subbasins defined and determined scientifically? What are the limitations of the techniques used to determine them?
- 6) Is it possible that over-extraction of one part of the aquifer can impact other areas of the aquifer? What current studies have been completed to support these findings? Are the sampling techniques used sufficient to determine the state of the water throughout the Northern Guam Lens Aquifer? What are the limitations in the sampling techniques used in these studies?
- 7) What is the rate of sinkhole formation over the Northern Guam Lens Aquifer? How does the changing topography affect the recharge rates and the quality of the water recharging the aquifer? Are there any current studies that are used to determine the recharge rates? What are the limitations to these studies? How will the rate of sinkhole formation

- change with the increase of construction and activity over the Northern Guam Lens Aquifer?
- 8) How will the impacts to the state of the Northern Guam Lens Aquifer of drilling additional water wells be determined? Will the impacts be determined before drilling or afterwards?
 - 9) What is the current level of water consumption by the military both for industrial and residential purposes? How much of this water will be used in situ? How much will be used off-island? How and with what frequency will water consumption by the military be monitored?
 - 10) Will there be an annual cap for water consumption by the military? If not, what is the estimated peak and average water consumption? What safeguards or procedures are in place to ensure that over-extraction of our water resources both in the Northern Guam Lens Aquifer and surface waters does not occur?
 - 11) The DEIS does not adequately explain their figures of how much water will be consumed during the construction phase and the expected use of water by the H2B worker population. What methodology was used to determine water consumption for construction and usage by the worker population?
 - 12) The DEIS projects a shortfall of water consumption during the construction phase based on current water production levels. How will this shortfall impact the existing water consumers?
 - 13) What is the proximity of the toxic sites, including but not limited to Installation Restoration Projects (IRPs), to the potential location of proposed water wells? What methodologies will be used to determine the potential for the drilling of new wells to facilitate the movement of toxic materials from the surface or subsurface into the water supply in the Northern Guam Lens Aquifer? What are the limitations to these methodologies?
 - 14) What containment procedures will be used in case of release of toxics from increased military activity, training, and/or usage? How will these toxics be prevented from reaching the water supply in the Northern Guam Lens Aquifer? What is the level of effectiveness of these procedures? What are the limitations of these procedures?
 - 15) Are there any current containment measures for accidental explosion of THAD missiles? How will the toxics from the THAD missiles be prevented from reaching the water supply both in the Northern Guam Lens Aquifer and other water sources? What is the effectiveness of these procedures? What particular studies have been completed to show the effectiveness? What are the limitation of these studies and the procedures of containment and prevention of the spread of contamination?
 - 16) What chemicals and toxins that are of environmental and health concern that are currently used by the U.S. military and which are not included on the battery of tests for water quality (drinking and otherwise) required by the U.S. EPA and Guam EPA?
 - 17) Will the water be tested for these potential toxins (chemical, biological, radiological, and others)?

Sincerely,

Sabina Perez
c/o We Are Guahan Coalition at core@weareguahan.com
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