



*National Weather Service
Employees Organization*

**Comments on the March 2006 Public Draft Environmental Assessment
National Oceanic and Atmospheric Administration Pacific Region Center**

Attn: Mrs. Christine Fong
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Sent via facsimile to 808-471-5870

Dear Mrs. Fong:

Please consider the following comments on the above captioned Environmental Assessment (EA):

1. In the summary, the document indicates that “with the implementation of Best Management Practices, there would be no significant impacts to physical conditions under the Preferred Alternative” (Ford Island site for Pacific Region Center (PRC)). It is difficult to identify in the document the Best Management Practices being applied. If, based on application of Best Management Practices, the conclusion is a Finding of No Significant Impacts (FONSI), the measures used to mitigate otherwise significant effects (Best Management Practices) should be identified and discussed. See, for example, the vague description of “remediation of site contamination” at p. 2-1 and 3-2. In order to comply with NEPA, remediation and other mitigations measures, if supporting a FONSI, must be identified to facilitate monitoring and allow validation of agency performance of the mitigation measures. This is particularly crucial when, as here, the site is listed on the National Priorities List (Superfund Program), where additional investigation is being conducted of probable petroleum and hazardous substance contamination, and follow-up site visits are planned to document a not yet existing Finding of Suitability to Lease (p. 3-2). It is noted that other alternative sites do not have contaminant issues.
2. On p. 2-3 the document states the NOAA PRC will provide, among other things “secure facilities for detainees”. There is no further elaboration as to type and number of detainees anticipated, additional security or other services required to accommodate detainees, or degree of risk for employees or members of the public proximate to any such detainees. There is no discussion of what could be a significant security and safety issue. Consequently, the EA lacks information necessary to support a FONSI.

3. One conclusion presented is that no significant impacts to traffic would occur under the Preferred Alternative with the implementation of proposed minor roadway improvements. Contrary to the traffic studies presented (section 3.4), common first hand experience in the area indicates current traffic is heavy with frequent back-ups near the causeway entrance. Additionally, the traffic studies presented do not appear to incorporate all traffic anticipated with additional housing proposed for the Ford Island site. For example, approximately 900 proposed additional housing units were presented to Honolulu NOAA employees during an “All Hands” meeting hosted by NOAA on Feb. 21, 2006. Additional family housing would be expected to result in additional trips on and off the island for child care, schools, medical services, retail establishments, business, recreation, errands midday, and more. One line notes no schools are located on Ford Island. P. 3-3 Other services (medical, dental, retail sales, etc.) are not mentioned. This document does not adequately demonstrate how these additional traffic burdens are considered in assessing the alternatives. The document, at section 4.11, allows as how the EA has identified potential adverse impacts on traffic from the Preferred Alternative. It then proceeds to assert that addition of a fourth traffic lane to Ford Island Boulevard and a second right turn lane on the Honolulu-bound direction of Kamehameha Highway will reduce traffic burdens to “acceptable levels”. It is also unclear whether the traffic conditions analyzed are for the bridge, the intersection accessing the bridge, or for traffic passing the area. At p. 3-21, the 2013 traffic conditions analyzed for peak hours, with the vaguely specified traffic projects and the addition of a fourth traffic lane, are estimated to represent an increase of 224% over 1999 volumes, with traffic leaving Ford Island a more than sevenfold increase. Afternoon peak estimated traffic onto Ford Island represents an increase of 257% with traffic leaving a more than six-fold increase. Given the information and increases projected to already heavy traffic, it is difficult to understand how the document, without more, supports a FONSI – even with turn lanes added. Also see the discussion of emergency service access and evacuation.
4. Despite the limited access to the Preferred Alternative site (one bridge and see description of access restricted to Navy personnel, military residents, contractors, and other authorized personnel, with public access limited) p. 3-3, there is no meaningful discussion of emergency response access or evacuation realities. The traffic studies do not address the practicalities of traffic issues associated with any emergency access or evacuation situation. Simply put, there are real issues involved in getting emergency services onto Ford Island if needed, as well as important issues with any evacuation required due to emergency circumstances. Particularly given recent hurricane experiences in the SE CONUS, it would be prudent for NOAA to assess and consider emergency services and evacuation options in making determinations as to location of the PRC. This is a relevant consideration that is not addressed or analyzed in the document. The EA should be revised to address these issues and if the analysis does not support a FONSI, an EIS is warranted.
5. Infrastructure issues associated with the Preferred Alternative include availability of emergency fire, ambulance, police, and medical services. Some services located on or near Ford Island are described (p.3-3) as “available”. There is no analysis of the scope of the available services or analysis of whether and how the emergency services described

can be expected to address or be available to address the needs of the 670 plus NOAA related workers plus additional proposed populations (PRC and additional housing). A discussion of police type services does not appear to be included – whether it be Honolulu City, military police, or Federal Protective Service. Also, the Island of Oahu recently experienced extreme flooding and severe raw sewage and wastewater discharges into the ocean. As a consequence of these recent events, utilities and storm drainage issues require analysis for proposed sites, not just description (p. 3-2). This would be particularly true for NOAA as a coastal oceans agency seeking to create a world class center. Again, as plans for additional housing on the Preferred Alternative site are known, a cumulative effects analysis must include discussion of the infrastructure effects associated with the proposed action and those other actions. Sewage and rain and floodwater capacity is a very real issue and is not addressed adequately in this EA to support a FONSI conclusion. Note, other alternative sites are described as having access to municipal existing fire, police protection, and ambulance services (p. 3-8).

6. There is no discussion or analysis of public transportation services and access to the actual Preferred Alternative site on Ford Island as compared to other alternatives. It is unclear whether there is public bus access to the proposed pass office [to be constructed] and/or the proposed NOAA PRC site. There is no discussion of shuttle services or other aids to facilitate transportation other than by private vehicle. Similarly, the discussion of Alternatives fails to address other infrastructure needs including availability of child care for dependents of workers. Particularly given the bridge and pass office access and other considerations, the socio-economic analysis should address public transportation options as well as the effects on children and availability of support services. This lack of information and analysis fails to meet the spirit of NEPA and the EA is lacking in that it does not treat significant issues.
7. No lead-based paint survey has been conducted, but it is likely lead-based paint was used in Building 175, 176, 130, and S181. It is similarly likely that due to the deteriorated condition of the buildings, chips and dust around the buildings – as well as past operations involving contaminants – mean heavy metal contamination of the area is likely. P.3-3 vs alt. sites with no contaminants 3-8. Mitigation and/or risks are not addressed in the document.
8. Related to the comments above on wastewater issues for the Preferred Alternative, the EA indicates at 2-3 the Seawater Laboratory facility would include a seawater well and wastewater treatment and discharge system. Information on the wastewater treatment and discharge system is lacking. As described in the document (3-14 and on), water quality in Pearl Harbor is poor, but hopefully improving. Sediments etc. have a high level of contaminants. Although the document indicates water from the wells should be of sufficient quality, (section 4.3.1), discussion of specific plans for protection of the environment from harmful discharges from the Seawater Laboratory facility is not included. The discharge of potential alien species, wastes, pathogens, or potentially harmful materials into ocean waters is an issue. The EA is deficient in failing to clarify the treatment that will be afforded Seawater Laboratory discharges. It is not clear whether they will be included in other sewage/waste treatment. This is a significant issue

in the Hawaii environment and merits particularized discussion prior to a FONSI conclusion. If specialized measures are required to mitigate risks, then any FONSI must specify the mitigation measures and they should be discussed in the document.

9. Although the preferred alt. project site is on military property, there is little or no description and analysis of effects of the military control of the space and access so far as ensuring the improved “business opportunities” purpose for the project. For example, the property is limited access based on military guidelines and procedures. The document does not address the fact public access will be more restricted than on other alternative sites including that employees, contractors and visitors may be restricted from access during periods of heightened security. There is no discussion of whether military guidelines on use of personal property will apply and may bar access (motorcycle operator garment requirements, cell phone use in vehicles, bumper stickers and/or decals on vehicles etc.); and what effect “banning” of a member of the public, contractor, or employee from military property may have on “business opportunities”. There is no analysis on how heightened security procedures and lack of public transportation may or may not discourage access by minority and low-income populations including non-English speaking fishermen or others. Absent treatment of these issues, it is difficult to assess whether the Preferred Alternative meets the needs stated for the project.
10. NOAA has failed to comply with the spirit and letter of NEPA, as well as NAO 216-6, by preparing this EA as an after-the fact justification of action. NOAA has already invested extensive staff time and resources in the Ford Island PRC plan, demonstrated by staff briefings on the progress of the Ford Island project as well as public newspaper and press releases and announcements that the PRC will be located on Ford Island.

Sincerely yours,

Daniel A. Sobien
National President