



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

JUN 28 2011

Mr. Dale Johannesmeyer, NEPA Coordinator  
BRAC Program Management Office Southeast  
4130 Faber Place Drive, Suite 202  
North Charleston, SC 29405

Dear Mr. Johannesmeyer:

The Environmental Protection Agency (EPA) has reviewed the Department of the Navy's (Navy) Draft *Supplemental Environmental Assessment (SEA) for the Disposal of Naval Activity Puerto Rico* (formerly Naval Station Roosevelt Roads) dated May 2011. In 2007, the Navy prepared the *Environmental Assessment for the Disposal of Naval Activity Puerto Rico* (2007 EA) to evaluate the potential environmental impacts associated with the disposal of Naval Activity Puerto Rico (NAPR) in accordance with the Commonwealth of Puerto Rico's 2004 Reuse Plan. In April 2010, the Commonwealth submitted an addendum to the original 2004 Reuse Plan. This draft SEA addresses the reuse of NAPR property in accordance with the Commonwealth's 2004 Reuse Plan with the 2010 Addendum. The 2010 Addendum proposes a twofold increase in the development of the property (approximately 6,000,000 square feet in total) as compared with the 2004 Reuse plan, including a large casino, entertainment area, restaurants, an 18-hole golf course and a 1,000 room hotel.

On February 9, 2006, EPA commented on the 2007 draft EA. As we received no response to our letter nor a copy of the Final EA, many of our original comments still stand. A copy of our 2006 letter is enclosed for your information.

Regarding the draft SEA, EPA has several overarching concerns.

- The Commonwealth's 2010 Reuse Plan Addendum was not included in the SEA. It is difficult to identify environmental impacts without a complete description of a proposed project.
- EPA understands that the 2010 Reuse Plan will not be approved by the Puerto Rico Planning Board until a hearing on June 30, 2011. Modification of the SEA may be necessary if changes are made to the plan. In addition, the SEA relies on the Puerto Rico Planning Board to prepare special zoning or conservation guidelines to mitigate any environmental impacts from the 2010 Addendum. The Board has not released any special zoning or conservation guidelines that would provide mitigation. Without this, the adequacy of the mitigation cannot be determined.

- The Navy's 2007 EA was not available on the BRAC website. The original EA would have provided information to assist agencies and the public to understand the change in environmental impacts.

We have also enclosed a list of more specific comments on the SEA. In general, EPA finds that the document does not provide enough information on the proposed use of the land, nor does it provide appropriate analyses of indirect or cumulative impacts.

We thank you for the opportunity to comment on the SEA. If you have any questions, please call Lingard Knutson of my staff at (212) 637-3747.

Sincerely,



Grace Musumeci, Chief  
Environmental Review Section

Enclosures

1) Figures 1-3 and 2-1 appear to show Cabras Island as being included in Parcel III. Likewise Figure 2-1. If these two figures are correct, then solid waste management unit (SWMU) #79, the former Navy drone launching operations on Cabras Island, must be added to Table 3-2, Summary of Environmental Sites within Parcel III. Also, Figure 3-2 (Environmental Contamination Sites within Parcel III) would need to be modified to include SWMU #79. SWMU #79 was used by the Navy as a drone launching site, and was identified as a new SWMU in 2009, subsequent to issuance of the 2007 RCRA Consent Order. Based on evidence of releases of hazardous constituents, the Navy is now required to implement a Phase I RCRA facility investigation (RFI) and other corrective actions as necessary.

However, EPA understands that Cabras Island will be retained by the U.S. Coast Guard, and will not be included within Parcel III. If that is correct, then Figures 1-3 and 2-1 need to be modified. Language should then be added to the SEA making it clear that Cabras Island will not be part of the proposed Parcel III development, including the "Destination Anchor" area shown on Figure 2-1.

2) Table 3-2, Summary of Environmental Sites within Parcel III must be modified as follows:

(a) for SWMUs (Sites) 10, 23, 25, 30, and 39, the status under the 2007 RCRA Consent Order should be Corrective Action Complete, with controls.

(b) for SWMU 11 (Site 11), Site Access Restrictions and deed restrictions are required by the 2007 RCRA Consent Order. The Corrective Measures Study cannot be completed at this time as no final decision has been made by the Navy regarding the final disposition of Building 38.

(c) for SWMU 45 (Site 45), a Corrective Measures Study is currently being implemented, as required under the 2007 RCRA Consent Order.

(d) for SWMUs (Sites) 46 and 53, although all corrective actions required under the 2007 Order have been completed, the determination of Corrective Action Complete with controls has not yet undergone required public review, nor has the Corrective Action Order been modified to reflect that determination.

(e) for ECP Site 4, please indicate that it is designated SWMU 58 under the RCRA Consent Order.

(f) for AOC F – under Status, please add the comment that at Site 1738, a work plan for treatment through in-situ chemical oxidation (ISCO) was submitted to EPA to address the constituent MTBE in the groundwater.

(g) the footnote that "Shaded Areas Require No Further Action" needs to be modified to indicate that, for all sites where Land-use Controls are required, maintenance of those controls and submission of an Annual Report to EPA documenting those controls are required under the 2007 RCRA Order.

- 3) Section 3.2.4 (Administrative Order on Consent) The second sentence of paragraph 2 should be modified to indicate that since the Consent Order was signed, SWMU #79 (former Navy drone launching operations) located on Cabras Island was also designated by the USEPA as a SWMU and that official notification was sent by the Navy.
- 4) Figure 1-3 and 2-1 both appear to include SWMU 76 (the Army National Guard Boat Maintenance Facility) within Parcel III. EPA understands that this SWMU will be retained by the Puerto Rico National Guard and will not be included in Parcel III. If so, Figures 1-3 and 2-1 should be revised. Also, language should be added to the SEA making it clear that the Puerto Rico National Guard Boat Maintenance Facility (SWMU 76), though wholly contiguous to Parcel III, will not be part of the proposed Parcel III development.
- 5) Figure 2-1 appears to include SWMU 73 (former DRMO Scrap Metal Recycling Yard) and other portions of the 53.77 acre Camp Moscrip parcel within the area of the proposed "El Yunque Ecotourism Resort." EPA understands that SWMU 73 and rest of the Camp Moscrip parcel have been transferred to the U.S. Army, and will not be included in Parcel III. Figure 2-1 should be revised. Also, the SEA should make clear that SWMU 73 and the Camp Moscrip parcel will be retained by the U.S. Army; and will not be part of the proposed Parcel III development.
- 6) Figure 2-1 appears to include the former base Hospital within the area of the proposed "Golf Course and Country Club" development. EPA understands that the 27.9 acre hospital parcel has been transferred to the Servicios De Salud Episcopales, Inc., and will not be part of the proposed Parcel III development. Please revise Figure 2-1 to reflect that. Also, language should be added to the SEA making it clear that the Hospital parcel will be retained by the Servicios De Salud Episcopales, Inc., and will not be part of the proposed Parcel III development.
- 7) LUC – land use control – should be added to the Acronyms and Abbreviations section.
- 8) Section 3.7.4. The SEA did not provide a detailed map identifying the 3,340 acres of land being held for conservation purposes by the Puerto Rico Conservation Trust. Here, and throughout the EA, the Navy discusses a developmental buffer zone identified by the 2010 Reuse Addendum as a way of mitigating impacts from the new development. Until such buffer zones are formally established and legally documented, the SEA should include the impacts of the development on the mangroves, wetlands and other ecosystem types on the conserved lands. Enumerating the impacts will emphasize the need for the timely creation of the buffer zones.
- 9) Section 4.3.1. The Navy has not provided a potable water use budget. While the SEA references a document titled "Naval Station Roosevelt Roads Potable Water Demand Determination and Cost Analysis Report," this document is not available in the SEA.
- 10) Section 4.3.2. The Navy has not provided a waste water collection and treatment budget or satisfactorily shown that the existing systems can handle waste water through Phase II. While the

SEA references a document titled “Naval Station Roosevelt Roads Wastewater Generation Determination and Cost Analysis Report,” this document is not available in the SEA.

11) Section 4.3.3. EPA recommends that the Navy provide a letter from the Puerto Rico Power Authority’s supporting its findings that the existing electric system infrastructure would be sufficient to service the Parcel III properties throughout Phase II of the 2010 Reuse Plan development.

12) Section 4.3.6. According to the Puerto Rico Solid Waste Management Authority’s 2010 document titled “Solid Waste Management in Puerto Rico: Realities, Facts and Figures,” only 24 landfills are now in operation on Puerto Rico. None are located in Ceiba, the municipality containing the NAPR property. By 2014 only 14 landfills are expected to be operational. The 2004 document cited in the draft SEA is out of date, and does not include solid waste to be generated by the proposed casino and large hotel. This section must be updated.

13) Section 4.8. Page 4-48. The document states, “Any increase in vessel traffic in Ensenada Honda or Bahía de Puerca which could result in a corresponding increase in the potential for manatee/boat collisions in these areas would be regulated through the USACE permitting process.” This statement is incorrect. The USACE does not regulate vessel traffic or vessel volume in a port. Under Section 10 of the Rivers and Harbors Act, and Section 404 of the Clean Water Act, the USACE does permit port construction and dredging. However, the USACE has no continuing authority over how many vessels are allowed to use a port. The Corps would not be able to minimize possible adverse effects to endangered or threatened species caused by the volume of vessel traffic. This is an indirect effect of the disposal of the NAPR property and should be part of the Endangered Species Act consultation for that action.

14) Section 4.11. The Puerto Rico Planning Board letter concurring with the Navy’s finding that the proposed action would not constitute an effect on coastal uses and resources must be included in the EA. “TBD” is not adequate.

15) Section 5. The disposal of the NAPR property will decrease the available area for wildlife in the Municipality of Ceiba. This loss of habitat should be analyzed cumulatively by discussing the loss of habitat in the Municipality over the last few decades and projecting this loss into the future.

16) Section 5.1. The proposed development in Zone 2, known as the Caribbean Riviera, has increased significantly from the 2004 to the 2010 Reuse Plans. The SEA does not provide an analysis of potential visitor/worker traffic volumes during Phase II. Depending on this analysis, any needed road upgrades on the property should be analyzed for indirect and cumulative impacts.

16) The draft SEA should discuss the issue of recycling of all solid waste to be generated by the 2010 Reuse Plan.

17) The Navy identified the 2010 Reuse Plan Addendum's impacts as indirect to the action of disposing the NAPR property. However, many of the indirect environmental impacts were not thoroughly analyzed. For example, the impacts of the additional upgrades to the existing potable water system are mentioned, but not analyzed.

18) EPA recommends that the Endangered Species Act consultation and Essential Fish Habitat assessment be contained within the draft SEA.

19) The NAPR property has acted as a safe haven for several threatened and endangered species. The Navy should discuss the use of deed restrictions on the property to minimize impacts to these species. While the Navy states that it is anticipated that the Puerto Rico Planning Board will adopt a Special Zoning Plan and conservation measures, this has not happened since the first Environmental Assessment, and may not be reasonably foreseeable. Deed restrictions on the property would ensure that impacts to endangered and threatened species are mitigated.

20) Lodging facilities have some of the highest resource utilization rates of all commercial/service buildings. These facilities can significantly impact the environment (e.g., air and water pollution) and put pressure on infrastructure (e.g., electrical generation, water use, solid waste, waste water treatment). In addition, increasing prices of basic commodities, such as energy and water, call for the implementation of resource efficiency measures in lodging facilities. Such measures are important to promote both environmental and business sustainability. The hospitality sector's impacts on the environment can be reduced through sustainable facility design, construction and operation. In other sectors, sound building construction and operation practices have demonstrated reduced water, energy use, and solid waste generation, which collectively contribute to cost savings.

EPA formally established a partnership between the Puerto Rico Tourism Company (PRTC) and the Puerto Rico Solid Waste Authority (PRSWA), for the strengthening of a green lodging program in Puerto Rico. EPA, PRTC, and PRSWA staffs are available to work with the developer of this project to ensure that sustainability principles are incorporated into the design and operation of these facilities. Please visit our hospitality sector website at: <http://www.epa.gov/region02/p2/hospitality/index.html>.