



SIERRA CLUB OF HAWAI'I

Date: June 30, 2023

Re: Comments on the Red Hill Defueling and Fuel Relocation Draft Environmental Assessment/Overseas Environmental Assessment

Administrator Joint Task Force - Red Hill and Defense Logistics Agency,

Thank you for the opportunity to comment on the Red Hill Defueling and Fuel Relocation Draft Environmental Assessment/Overseas Environmental Assessment ("EA/OEA").

The Sierra Club of Hawai'i has a long history of protecting our islands' natural and cultural resources, access to clean water systems, and the health and welfare of our communities. We recognize that the draft environmental assessment for the movement of fuel from the Red Hill Bulk Fuel Storage Facility marks a potential shift towards greater transparency in Department of Defense operations; however, the Sierra Club of Hawai'i expresses its concern regarding a need for the EA/OEA to incorporate the spirit and directives of Executive Order 12898 ("EO 12898"), in assessing the potential impacts of Alternative #2 on proposed relocation sites and adjacent communities – especially those that have experienced past exceedances in environmental and public health limits.

While the EA/OEA purports to be consistent with the policy considerations behind EO 12898, further consideration of the environmental justice effects of the proposed relocation is strongly recommended. EO 12898 seeks the achievement of environmental justice by "identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."¹ Accordingly, further work must be done to ensure that the EA/OEA reflects the full meaning of environmental justice, which includes every individual's explicit right to a healthy environment being freely exercised, "whereby individual and group identities, needs, and dignities are preserved, fulfilled, and respected in a way that provides for self actualization and personal and community empowerment."² Given that communities proposed to receive environmentally hazardous fuel under the EA/OEA have been disproportionately burdened by environmental injustices, including those arising from US military actions and activities, the EA/OEA must assess how these disproportionate burdens may be exacerbated by the added threats and risks of the proposed movement and storage of fuel.

¹Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations, 59 Fed. Reg. Vol. 59 (Feb. 16, 1994).

²<https://www.nmhealth.org/publication/view/help/309/#:~:text=Environmental%20justice%20refers%20to%20the,and%20personal%20and%20community%20empowerment.>

In addition, an essential component of environmental justice is community engagement, inclusion, and agreement to actions that could place them at disproportionate risk of harm. All such individuals should be entitled to active participation throughout the decision-making process. No community should be denied crucial knowledge regarding projects that exacerbate their vulnerability to environmental impacts, especially when such impacts may be compounded by prior impacts and future threats such as the climate impacts.³

Alternative #2 in the EA/OEA insufficiently assesses and addresses the environmental justice ramifications of its proposal to relocate fuel to existing locations within the DoD fuel supply chain, to communities that have historically experienced disproportionate harms to their surrounding environment. We advise the Navy to consider Alternative #2 as a sorely needed opportunity to acknowledge and assess *past and present* environmental and subsequent socioeconomic harms, and ways to mitigate any potential exacerbation of such harms - including but not limited to remedial actions that address the disproportionate burdens that recipient communities have experienced and continue to experience. Anything less than preventative and restorative measures in the relocation plan, with full transparency, outreach, and engagement for destination communities, risks perpetuating and amplifying existing environmental injustices.

A quick review of proposed sites for receiving fuel in Alternative #2 reveals the following entrenched environmental injustices:

- **West O‘ahu (Campbell Industrial Park):** West O‘ahu residents have been subject to health inequities for decades due to poor air and water quality from various “community disamenities” - including the siting of power facilities and O‘ahu’s primary landfill in the region (which have notably been used to process (burned) and store highly hazardous military waste). In the recent past, the EPA has also found Campbell Industrial Park facilities to be in violation of the Clean Air and Resource Conservation and Recovery Act for improper management of hazardous waste⁴. The impact is so acute in this area that a study found that the life expectancy estimate of residents in the Waianae zip code to be ten years less than the rest of O‘ahu;⁵ many of these residents are working class communities of color with the highest percentage of Native Hawaiians on the island.

Further west, military occupation and use of the Mākua Military Reservation have raised significant concerns about the environmental health impacts of military training in the area, which has also deprived Native Hawaiians of their physical and spiritual connections with their ancestral lands in Mākua Valley.

From an environmental justice perspective, it should be acknowledged that the historical and present presence of the military in West O‘ahu has riddled the area with

³*Vecinos para el Bienestar de la Comunidad Costera v. FERC*, 6 F.4th 1321, 1329 (D.C. Cir. 2018), ruling that the analysis of the project’s impacts on communities would extend well beyond the project sites.

⁴<https://www.epa.gov/newsreleases/epa-fines-par-hawaii-refining-facilities-over-chemical-safety-hazardous-waste>

⁵https://www.cdc.gov/pcd/issues/2018/18_0035.htm

contaminated land and waters, causing physical, spiritual, and cultural harms to people and the environment, and the threat of exacerbating these harms through the potential storage of fuel in the region must be assessed and mitigated through community consultation and remedial actions.

- **Selby, California:** Selby most notably houses the Selby Slag, a 66-acre, 2.5 million ton slag pile loaded with toxic heavy metals, a state Superfund site. This highly contaminated stretch of San Francisco Bay waterfront land is laced with huge amounts of health-damaging lead, zinc, copper, arsenic, antimony, cadmium, and nickel.⁶ Additionally, there are numerous oil refineries, chemical plants, and steel plants in Selby, practices that are known to be large polluters. Further exposure to potential hazards would potentially exacerbate dwindling resources for this community, and such threats should be assessed and mitigated through community consultation and remedial action.
- **Puget Sound, Washington:** The Puget Sound has experienced a number of environmental issues especially related to the health of their aquatic ecosystems. As reported by the Department of Ecology, industrial activities like agriculture, manufacturing, and wastewater treatment have all contributed to toxic pollution, acidification, and bacterial pollution in Puget Sound.⁷ Given that two-thirds of the state's population lives in the Puget Sound region, assessing the disproportionate risk to these communities in the fuel relocation process is critical.
- **Vancouver, Washington:** Vancouver already ranks as one of the cities with the greatest environmental health risks to residents due to lead exposure, proximity to Superfund sites, diesel emissions, and various air quality issues. The EA/OEA must assess the threat of exacerbating these health risks under Alternative #2, as well as options for mitigating such risks through community consultation and remedial actions.
- **Manchester, Washington:** The Manchester Fuel Depot is the Pentagon's largest single fuel station in the US, storing approximately 1.8 million barrels of fuel.⁸ This site has confirmed or suspected contamination and is in the state cleanup process under Washington's [Model Toxics Control Act](#). The facility sits on approximately two miles of shoreline and is separated by a 26-acre tidal lagoon, Little Clam Bay, and a county road. The property also contains a perennial stream, Beaver Creek, which runs through the north end of the facility and various man-made spill containment ponds. In June 2023, it was reported that two types of per- and polyfluoroalkyl substances (PFAS) that exceed an advised environmental standard were detected at Naval Base Kitsap-Manchester in 2022. The surrounding community is awaiting answers for the water tests underway. In the meantime, they must be consulted and options for mitigating the risks of exacerbating their current environmental challenges - including through remedial actions - must be assessed.
- **Sasebo, Japan:** Sasebo was a small fishing village militarized by the Imperial Japanese Navy that was later greatly destroyed during World War II and reestablished by the Allied

⁶<https://www.sunflower-alliance.org/comment-on-selby-slag-remediation-april-12/>

⁷<https://ecology.wa.gov/Water-Shorelines/Puget-Sound/Issues-problems>

⁸<https://www.kitsapsun.com/story/news/local/2017/12/05/manchester-fuel-depot-plans-replace-wwii-era-underground-storage-tanks/915357001/>

forces and US Fleet Activities.⁹ Sasebo remains a US Navy installation today that primarily serves to repair US and Japanese naval ships.¹⁰ Navy ship repairs often require large quantities of hazardous and toxic materials, which, when coupled with the waterfront location of shipyards that provide pathways for potential pollutants to enter directly into the aquatic environment, are greatly problematic.¹¹ The Sasebo community must be consulted as part of the EA/OEA process and options to mitigate the exacerbation of existing threats to their environment, health, and welfare must be assessed.

- **Port of Singapore:** The Port of Singapore is the top maritime capital of the world as well as one of the busiest. Emissions from ships as well as other sources of air and water pollution, noise, odors and visual impact are among the main environmental impacts of the port. Community consultation and remedial actions to mitigate additional environmental threats and impacts must be assessed.
- **Subic Bay, Philippines:** The legacy of the US military in the Subic Bay is one of toxic waste spilled and pumped into waterways and buried in landfills for decades.¹² The area's inhabitants have experienced toxic pollution and environmental health issues since the 1990s. A study in 2000 for the Philippine Senate also linked the toxins to "unusually high occurrences of skin disease, miscarriages, stillbirths, birth defects, cancers, heart ailments and leukemia."¹³ Subsistence fishers have been dislocated due to the pollution to the bay over the past decade. Community consultation and remedial actions to mitigate additional environmental threats and impacts arising from the movement and storage of fuel under Alternative #2 must be assessed.
- **Darwin, Australia:** Darwin residents have already dealt with years of PFAS contamination as a result of extensive military presence in the port. It has been confirmed that recreational activities should be avoided in the two nearby creeks, which are popular fishing spots, particularly with local Indigenous groups.¹⁴ Homegrown produce on residential properties in the area could pose a health risk because of PFAS concentration in the soil as well. Community consultation and remedial actions to mitigate additional environmental threats and impacts arising from the movement and storage of fuel under Alternative #2 must be assessed.

Given the historical and present environmental injustices at and surrounding the proposed fuel receiving sites, much of which are the result of military activities, the Joint Task Force-Red Hill and US Defense Logistics Agency is urged to complete a thorough assessment of the impacts of fuel relocation on these sites' environment and surrounding communities - including ways in which these injustices may be exacerbated by the threat of fuel movement and storage. It is essential that the Navy is transparent in the relocation process and both assesses and takes

⁹<https://www.pearlharborhistoricsites.org/blog/sasebo>

¹⁰<https://www.navsea.navy.mil/Home/RMC/SRF-JRMC/Japan-Tours/WorkingInJapan/SRFJRMCsaseboOperations/>

¹¹ <https://www.oecd.org/sti/ind/46370308.pdf>

¹²https://globaldale.files.wordpress.com/2011/11/toxic_wastes_facts-figures-nov-12-2011.pdf

¹³<https://mandalaprojects.com/ice/ice-cases/subic.htm>

¹⁴<https://www.theguardian.com/australia-news/2017/jul/27/seafood-in-popular-darwin-fishing-spots-contaminated-by-toxic-foam>

restorative or remedial actions to fulfill the spirit and directives of EO 12898, and ensure earnest trust is built with communities both nationally and internationally. Restorative measures should be taken to mitigate any anticipated impacts to ensure that similar detrimental events like the fuel releases and forever chemical spills at the Red Hill Bulk Fuel Storage Facility do not harm the land, water, and people of any area. Importantly, nearby communities that may be subject to fuel relocation should be notified and meaningfully engaged in the decision making process before the arrival of fuel.

Thank you for the opportunity to submit comments and for providing additional information on the Red Hill Defueling and Fuel Relocation Draft Environmental Assessment/Overseas Environmental Assessment.

Sincerely,
Sierra Club of Hawai'i