



Commonwealth of the Northern Mariana Islands Military Integration Management Committee

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Official Comments and Position on the

**GUAM AND CNMI MILITARY RELOCATION
DRAFT ENVIRONMENTAL IMPACT STATEMENT**

Compiled and approved by the
Policy Committee of the MIMC

BACKGROUND:

THE COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS MILITARY INTEGRATION MANAGEMENT COMMITTEE CHARTER was established in June, 2009 and sets forth the terms for and shall govern the function of the Commonwealth of the Northern Mariana Islands (CNMI) Military Integration Management Committee (hereafter CNMI-MIMC) as the planning and policy-making entity for all activities that relate to the expansion of military training activities to CNMI resulting from the United States Pacific Command's (USPACOM) initiative known as the "Integrated Global Presence and Basing Strategy (IGPBS)", the United States' and the Government of Japan's "Roadmap for Realignment Implementation", and other defense transformation initiatives in CNMI and Guam. The CNMI-MIMC will be the official entity through which the CNMI will interface with the Department of the Navy, United States Marine Corps, Joint Guam Program Office (JGPO) and other Department of Defense units per the guidance include herein.

The CNMI-MIMC policy committee consists of eight members: the Governor of CNMI, the Lieutenant Governor, the President of the Senate, the Speaker of the House, the Mayor of Saipan, the Mayor of Tinian, the Mayor of Rota and the Mayor of the Northern Islands and/or their designees. This committee is chaired by the Governor.

OVERVIEW:

The MIMC Policy Committee fully supports the military relocation throughout the CNMI and Guam. We understand the desire and need of the Department of Defense to continue to have a strong military presence in our region. We also wish to express our sincere commitment to working together with Guam and having a partnership with our neighbor islands that will benefit the entire region. Our comments have been thoroughly discussed and are offered to constructively bring up further discussion on these issues in hopes that the concerns of our people will be taken into consideration. We look forward to a positive and open dialogue in regards to the future of our islands.

Comments on Draft Environmental Impact Statement/Overseas Environmental Impact Statement, Guam and CNMI Military Relocation, November 2009.

The following comments address several concerns, issues and impacts associated with the DEIS. Several comments propose actions that provide an economic benefit to offset the lack of economic opportunity that was initially envisioned during the early scoping session. These are in contrast to the potential loss of access and economic opportunities eliminated by securing two thirds of the island for training and restricting access and use. The remaining deal with impacts that were not addressed nor had any mitigation proposed.

1. Section 2.3.1.2 page 2-11

Issue: Economic benefit: possibility for local contract

Quote: "Grass cutting and landscaping maintenance is required to keep range lines of sight and access intact ... (Section 2.3.5.1 states, "Presently, ranges on Tinian are maintained by contract and agreements with the Municipality of Tinian. These contractual agreements would be updated to include maintenance of the proposed ranges.)"

Comment: There is no existing contract between the local government and the Navy for maintenance of the Tinian Leased Lands. Providing opportunities for local employment is critical to a continuing positive working relationship between the local and military communities on Tinian. The following action is needed by the military to ensure positive relationships are established and maintained:

Solution: 1. Negotiate a new contract. Provide that all grass cutting and landscape maintenance on Tinian leased lands is bid to local contractors.

2. Section 2.3.1.3, page 2-11

Issue: Economic benefit: possibility for local contract.

Quote: "Sanitary facilities would be provided through portable means."

Comment: Providing opportunities for local employment is critical to a continuing positive working relationship between the local and military communities on Tinian. The following action is needed by the military to ensure positive relationships are established and maintained:

Solution: 1. Provide that all portable sanitary facilities needed for military operations on Tinian leased lands are bid to local contractors.

3. Section 2.3.3.1, page 2-13

Issue: Economic benefit: possibility for local contract.

Quote: Table 2.3.3-1. "3,280,000 rounds of ammunition will be expended on Tinian annually

Comments: 3,280,000 rounds of lead will contaminate Tinian soils. This does not count use during MIRC exercises. Every effort must be made to pick up the expended lead. Providing opportunities for local employment is critical to a continuing positive working relationship between the local and military communities on Tinian. The following action is needed by the military to ensure positive relationships are established and maintained:

Solution: 1. Provide that all clean up of expended bullets be bid out to local contractors and all contracts relative to this project are publically announced in the CNMI.

4. Section 2.3.5.1, page 2-19.

Issue: Economic benefit: possibility for local contract

Quote: "In order to properly maintain the range berms, the Marine Corps would periodically shut down the ranges and sift the expended rounds (i.e., ammunition fired from the weapons) from the soil on site, place the soil immediately back on the berm face, and contain and transport expended rounds to a local recycling contractor or smelter in accordance with all applicable regulations."

Comment: The term periodically is inadequate.

Solution: The period of time between times of clearing away the spent shells should be set by appropriate authorities so that the recycling can be accurate bid locally.

5. Section 2.3.3.2, page 2-13

Issue: Impact: Protection against invasive species

Quote: "The transport of 200-400 Marines to Tinian from Guam for the proposed 1 week per month company level training exercise would be via air transportation."

Comment: Serious agricultural pests exist on Guam that might be introduced to Tinian. US Wildlife Services is predicting that MIRC exercises may be bringing troops from Asia. Because the Brown Tree Snake, the Coconut Rhinoceros Beetle and other invasive species do not now exist on Tinian, every aircraft landing on Tinian must be inspected by a CNMI Quarantine Inspector, who has been trained and certified by USDA, APHIS-PPQ.

Solution: Fully adopt the plan outlined on page 2-14, "Biosecurity risk assessment and biosecurity plan, non-native species plan." Fully qualified entomologists must be assigned full time to Tinian to monitor invasive species.

6. Section 2.3.3.3, page 2-14

Issue: Impact: Biosecurity procedures

Quote: "Biosecurity training would be coordinated through informal consultations with USDA, WS, CNMI Department of Fish and Wildlife, and DAWR through regional training authority 1 week prior to training event." Page 10-25 "A BSP with Risk Analysis is currently being developed by the National Non-native Species Council in conjunction with the USFWS, U.S. Department of Agriculture, Guam Division of Aquatic and Wildlife Resources, CNMI Department of Fish and Wildlife, and other interested parties to facilitate a comprehensive approach to control non-native species export, import and spread"

Comment: Training and maintenance of the biosecurity plan must be constant and on-going.

Solution: The following action is needed by the military to ensure positive relationships are established and maintained: Complete the comprehensive Biosecurity Plan. A qualified federally funded official should be stationed permanently on Tinian with responsibility of preventing the introduction of invasive species to Tinian.

7. Section 2.3.3.2, page 2-13

Issue: Impact: Tinian Harbor usage

Quote: "If equipment is moved by barge, a single barge would be able to carry the equipment necessary to support the estimated 200-400 Marine training evolution."

Comment: Tinian Harbor, particularly the breakwater, needs repair. It is clear that eventually the Navy will require the use of Tinian Harbor to maximize its utilization of DoD Tinian Leased Lands. Sooner or later, the harbor will have to be repaired. The CNMI does not have adequate funding to support the reconstruction of Tinian Harbor.

Solution: The DOD should coordinate with the Office of Economic Adjustment to identify sufficient funding to complete a comprehensive reconstruction study, including the dredging of the access channel and the inner harbor to the original World War II depth. The Department of the Interior should participate in this process.

8. Section 2.3.3.3, page 2-14

Issue: Impact: Lack of adequate advance planning on Tinian for training exercises

Quote: "Training activity would be scheduled and notice provided in newspapers and via public service announcements on radio and TV at least 1 week prior to training."

Comment: In the past, Tinian has often not received notice of military arrivals until after the plane arrived. Tinian needs long range forecasting to ensure proper coordination during training exercises. Communications between the training officers on Guam and Tinian must be direct.

Solution: The U.S. Marine Corps should establish a community relations/recruiting office on Tinian with direct communications to headquarters, Guam.

9. Section 2.3.3.3, page 2-14

Issue: Economic benefit: Cultural resource education

Quote: "Cultural resource briefing would be completed prior to departure."

Comment: Cultural resource briefings regarding Tinian should be made on Tinian. Providing opportunities for local employment is critical to a continuing positive working relationship between the local and military communities on Tinian.

Solution: The following action is needed by the military to ensure positive relationships are established and maintained: Every Marine that visits Tinian should receive a cultural resource briefing on Tinian. This service should be bid out in the CNMI.

10. Section 2.3.3.3, page 2-14

Issue: Economic benefit: refueling ground transportation on Tinian.

Quote: " ... there will be four sorties assuming two High Mobility Multipurpose Wheeled Vehicles (HMMWV s) are included in the equipment lift."

Comment: These vehicles will need refueling. Providing opportunities for local employment is critical to a continuing positive working relationship between the local and military communities on Tinian.

Solution: The following action is needed by the military to ensure positive relationships are established and maintained: Allow refueling to be done at locally owned fueling stations.

11. Section 2.3.3.3, page 2-15.

Issue: Economic benefit: feeding the Marines while on Tinian

Quote: "Evening meals would be served in the Bivouac Area utilizing Meals Ready to Eat or Unitized Group Rations."

Comment: Providing opportunities for local employment is critical to a continuing positive working relationship between the local and military communities on Tinian.

Solution: The following action is needed by the military to ensure positive relationships are established and maintained: Provide that supplemental rations may be purchased from the local community, particularly fruits and vegetables.

12. Section 2.3.3.3., page 2-15.

Issue: Economic benefit: liberty for the troops

Quote: "Marines would collect brass and ammunition containers for transport to Guam and the range would be secured by 3. p.m"

Comment: There is no mention of what the Marines will do after 3:00 pm, although a previous section states there will be some night training. Providing opportunities for the Marines to visit the historical sites of Tinian as well as San Jose Village is critical to a continuing positive working relationship between the local and military communities on Tinian.

Solution: The following action is needed by the military to ensure positive relationships are established and maintained: Provide for the Marines to have liberty as often as possible during their training exercise.

13. Section 2.3.4.3, page 2-17.

Issue: Social Impact: cross training for local DPS, THS and EMO personnel.

Quote: "A fire management plan that would address the proposed action at Tinian is under development by NAVFAC Pacific. Units using the proposed Tinian ranges would be required to plan for and have the capabilities to respond to fires, consistent with the fire management plan in preparation. Using units also would be responsible for their own medical service using corpsmen and would secure access to a casualty evacuation aircraft while training on Tinian." Section 2.3.5.2, page 2-20, states, "Fire condition monitoring for firefighting readiness and modification of training a appropriate as part of RTA management procedures. Unit-based fire fighting capacity to access range areas with appropriate equipment") Section 3.2.2.1, page 3-13, states, "Units using the proposed Tinian ranges would be required to plan for and have the capabilities to respond to fires consistent with the fire management plan in

preparation. This would include fire condition monitoring for firefighting readiness, modification of training as appropriate as part of RTA management procedures, and unit-based firefighting capacity to access range areas with appropriate equipment.

Comment: Fires in the training area occur annually. Live fire practice will increase the probability of range fires. The Tinian Fire Department has had to respond to grass fires begun by live fire exercises in the past. Unless the Marine Corps is planning on moving fire equipment to Tinian for each exercise capable of controlling and extinguishing wild fires during the windy-dry season, the Tinian Fire Department will be forced to respond. It is also possible that an aircraft crash or ordnance explosion might cause multiple serious injuries. Tinian has experienced an aircraft crash during a training exercise when the Tinian THC was called to respond.

Solution: The following action is needed by the military to ensure positive relationships are established and maintained: The Marine Corps should provide continuous cross training activities with Tinian DPS, THC and EMO personnel. During exercises the Tinian Health Center and Tinian Department of Public Safety should be alerted.

14. Section 2.3.4.4, page 2-17.

Issue: Economic impact: Closure of Broadway.

Quote: "Broadway would be closed during training."

Comment: The lands north of West Field and east of Broadway are currently used by local ranchers according to the leaseback agreement. If Broadway is closed, ranchers will not be able to water their cattle.

Solution: The following action is needed by the military to ensure positive relationships are established and maintained: One of the old roads to the east of the leaseback ranches could be opened to provide ranchers with access to their cattle ranches.

15. Section 8.2.2.1, page 8-15.

Issue: Economic impact: termination of leaseback grazing permits.

Quote: "Alternative 1 would affect 35 agricultural/grazing permits, totaling approximately 2,552 ac (1,032 ha) as shown on Figure 8.2-1. There is little cropland and the soil types on Tinian do not meet the requirements for prime farmland (Young 1989, USDA 2009)." ". .. This would safeguard the public by keeping them out of any areas where there are potential dangers *while simultaneously maintaining access to areas where training is not being conducted.*" "Existing leases within the LBA would be reviewed and potentially terminated." Page 8-17 "Permits within the LBA would be terminated, causing less than significant impact to land ownership but significant impacts to agricultural use and to consistency with FPPA" Page 10-23 "Once more details are developed for the training operations on Tinian, the Navy would review the decision to terminate leases and retain those that are determined compatible with military mission requirements for the area."

Comment: These lease lands are used for grazing cattle. The grass grows quite well and provides a steady income to those who manage cattle ranches. The impact is significant to Tinian.

Solution: Those ranches that are directly impacted by training should be relocated to other sites within the Lease Back Area, possibly west of 8th Avenue. Only those permits affected by the firing zone should be terminated. These permit holders should be offered equal leases on other lands within the Lease Back Area.

16. Section 2.5.1, page 2-23

Issue: Impact clarification: Definition of range area

Quote: As shown in Figure 2.5-1, all four ranges associated with Alternative 1 are in the south-central portion of the MLA within the area delineated by 8th Avenue, 90th Street and Broadway.

Comment: 90th Street is not identified on any of the maps.

Solution: The north side of 86th Street and the east side of 8th Avenue form the southern and western boundaries of the range.

17. Section 2.5.1, Page 2-23

Issue: Impact: FAA Mitigation Zone

Quote: "All four range footprints partially overlay the FAA Mitigation Area."

Page 8-10 "There is a Federal Aviation Administration wildlife mitigation area and a no wildlife disturbance area in the LBA."

Comment: The mitigation zone was created at the time that the airport was being planned and created

Solution: The FAA mitigation zone must be re designated.

18. Section 3.2.2.1, page 3-13

Issue: Cultural impact: land clearing.

Quote: "Although construction footprints would be minimal, it is assumed the full area would be graded or cleared of vegetation."

Comment: The process of clearing will disturb identified archaeological sites.

Solution: As land clearing is conducted, all identified archaeological sites must be properly excavated.

All artifacts are to be recovered and curated by Historic Preservation Office, Saipan. Most important, the most distinctive artifacts are to be returned to Tinian to be housed in an appropriate museum.

19. Section 12.2.2.2, page 12-17

Issue: Impact: Tinian Historic Properties will be disturbed by construction and use of the firing ranges.

Quote: "Alternative 1 would result in significant direct impacts to 10 NRHP-eligible or listed archaeological sites and indirect impacts to 55 archaeological sites, one HHL, and one traditional cultural property. Page 16-22 "CNMI could request federal financial assistance for development of a small museum dedicated to Tinian's history"

Comment: Archaeological remains within the LBA are extremely valuable to the people of Tinian.

Solution: CNMI Historic Preservation Officers must be present during all land clearing and construction procedures. All artifacts discovered must be curreted by the CNMI Historic Preservation Office. All distinctive artifacts are to be returned to Tinian for display in a proper museum.

20. Section 4.2.1.1, page 4-16

Issue: contamination for surface water from leaks or spills."

Quote: "The storage of hazardous materials and fuels pose a continued risk of surface water contamination"

Comment: In is important to prevent contamination of surface water resources.

Solution: Provide a standard operating procedure for storage of hazardous materials on Tinian. Fuel storage spills can be eliminated by purchasing fuel locally in currently approved sites and locations

21. Section 8.1.2.6, page 8-10

Issue: Economic Impact: loss of use of Broadway for tour busses traveling to National Historic Sites at North Field.

Quote: "There are seven points of interest within the LBA that are on the Tinian self guided tour; however, public access is restricted during training" Page 9-5 "Broadway would be closed during training.

However, the public can travel up S" Avenue, check in with personnel manning the first access gate.

Once cleared by range control, they can proceed up 8th Avenue, checking in with each successive guard point until clear of the training area." "No potential mitigation is suggested for Alternative 1.

Comment: Tour busses now using Broadway, which is in good condition, will have to use S" Avenue. Portions of 8th Avenue are not paved. This will cause damage to busses and rental cars.

Solution: As all firing ranges are north of 86th street, vehicles should be allowed to turn west on 86th Street to reach 8th Avenue, to proceed to historical sites on North Field.

22. Section 14.2.2.1, page 14-4

Issue: Economic impact: roads in MLA.

Quote: "No mitigation measures are suggested."

Comments: Roads in on military leased lands were constructed by Seabees during World War II. Regular use of these roads by heavy military equipment will cause deterioration of the roadway.

Solution: An annual road maintenance program should be established. Key roads should be upgraded to handle frequent use by heavy equipment.

23. Section 17.2-1, page 17-7.

Issue: Impact: Hazardous Materials Transport/Transfer Consequences and Mitigation

Quote: Page 17-8, "Due to the projected increase in the volume of hazardous waste, Alternative 1 could result in significant impacts to human health and the environment."

Comments: No potential mitigation measures are identified. Mitigation plans should be established.

Solution: An independent party should be contracted to provide constant surveillance and inspections for full compliance with federal, local and DoD laws and regulations and implement corrective actions as necessary at the expense of the Navy.

The following comments are exclusively focused on the proposed mitigation measures, which remain unclear and undefined in terms of which government entity, federal or state, will be responsible for carrying out these actions. Furthermore, the mitigation costs associated with addressing the referenced environmental impact on the affected area (Tinian) are not provided. This is a grave concern in that the Commonwealth of the Northern Mariana Islands (CNMI) neither has the capacity or the financial means to ease the environmental and socioeconomic impacts brought forth by the planned military exercises on the island of Tinian.

For instance, the draft study reveals that there will be no significant socioeconomic impact on the infrastructure, housing, regional employment, and income; however, "effects on commercial and recreational fishermen, divers, and boaters would be short term in nature and produce some temporary access limitations." The same also shows that "some off shore events, especially if coincident with peak fishing locations and periods" could lead to "temporary displacement and potential economic loss to individual fishermen." We agree with the preceding statement; however, we feel that the second clause in this statement needs further clarification. In other words, how short will these effects be? What measurement tool was used to make this determination? What type of survey (if any) was conducted to conclude that the financial hardships that will be experienced by fishermen as a result of the temporary access limitations will yield a minimal impact? We are concerned because given our current dismal economic situation, most of the CNMI people rely on farming and fishing for supplemental income and subsistence. Moreover, we do not think that the advance public notifications announcing the temporary closure of these affected areas would suffice in terms of making up the economic losses incurred by the fishermen. Tourism would also be affected due to closure to some premium diving spots. Perhaps, as a recommendation, the DoD should provide some monetary compensation to the affected state (Tinian and Guam) for the incurred losses.

Another area of public concern involves the use of the Municipality of Tinian and Aguigan's airspace. Restricting airspace use may hinder the municipality's plan to expand its airport to allow direct international flights and this action may further exacerbate the island's local economy amid poor tourist arrivals. As with the previous recommendation, I suggest that the federal government consider providing some financial assistance to the municipality to alleviate the losses incurred by this airspace restriction.

The planned United States military buildup on Guam and the CNMI has many aspects for the benefits of the community if major preparation and mitigation are "balanced" and support will certainly harmonized the relationship of the DoD personnel with the local community. Although there are also many negative and environmental aspects of the buildup, we look upon it in with optimism for the benefit of our community.

As your report emphasizes the natural resources that we can provide in our community, take into account the proximity and the closeness of the northern tip of Guam and the most southern tip of the island of Rota. We are appropriately forty-seven (47) miles away.

The major development of the buildup is just in our doorstep in the northwest area of the island of Guam, which we can overlook from Rota on a clear day.

Rota would like to benefit from this buildup and we can offer our island with its great flora and fauna or our natural resources as an alternative recreation for the DoD personnel. Below are some of the positive objectives that we would like to offer:

- -Usage of a rest and recreation facilities
- -Create an adopt-school or adopt-village program
- -DoD personnel tourism group would create additional income
- -Plan ferry type transportation for travel with the proximity of the bases
- -Create an ecotourism for DoD personnel such a "bonnie stomping"
- -More local opportunity for economic development
- -More local workforce employed
- -Create a liaison office of the DoD personnel with the local government based in Rota

These are just a few of the way Rota can balance the support of the DoD personnel based on Guam. The strategic approach is that we all benefit from revenues collected from tourism and usage of facilities within Rota. This is an added value for recreations of DoD personnel that will be unique and a big difference from Guam. We are sure the DoD personnel will appreciate what we have to offer in Rota. The other aspect since the report is about balancing the support of DoD Guam; we feel that a great mitigation effort should be done within our island. Below are some of our concerns and issues that we want to implement in our island with the vast support of DoD Guam.

- -Continuous update of plan military exercise to inform our community
- -Information of the magnitude or impact of this exercise to our community
- -Plan an emergency alternative or program for mitigation efforts
- -Inform our community of the necessary preparation and usage of Rota
- -Coordinate at all times with our local government of events planned within our area
- -Inform and update any future unclassified plans for Rota
- -Continuous support and studies of environmental and usages of natural resources

In the economic aspects, we don't have major businesses or contractors to bid for any DoD Guam projects. Although, we would appreciate if DoD would upgrade our facilities to benefit everyone, especially DoD personnel coming to Rota for recreational purpose.

- -Providing continuous transportation between Guam and Rota
- -Help prepare our harbor area so that we can have adequate supplies from fuel to consumer goods
- -Upgrade our marina to provide more fishing or personal recreation boats to use by everyone
- -Support our farmers by purchasing our agriculture products and other domestic product we can provide to the DoD Guam

Our administration would like to tap on the vast resources of DoD Guam and to create a working relationship. We feel that Rota can accommodate some of these aspects that Guam may not be able to handle. The Mayor of Rota is prepared to fully cooperate and assist in any means necessary.

CLOSING:

The CNMI MIMC understands that the proposed military actions are complex projects involving multiple components of the US Marine Corps, Army, and Navy. While the Draft Environmental Impact Statement offers much needed answers to the proposed military build-up in our region, the lack of mitigation measures for the CNMI are of great concern.

The MIMC also understands that working in partnership with both the Department of Defense and the Territory of Guam are critical in reaching the ultimate goal of providing a unified plan that will provide both the freedom and security that we have come to enjoy from our association with the United States.

We welcome the military build up in our region in whatever capacity the U.S. Military deems appropriate and acceptable as long as the mitigation effects are in direct proportion to the proposed actions.

Sincerely,

Governor Benigno R. Fitial
Chairman
CNMI – Military Integration Management Committee