

NOTES REGARDING GUAM/TINIAN MILITARY BUILD UP EIS

1. The proposed Tinian ranges are for training Marines with use of weapons similar to proposed Guam ranges, but in a “tactical scenario” in combination with the battalion landing (900 troops) and maneuver exercises and other larger unit training capabilities on the island as assessed in the MIRC.
2. Training proposed for Tinian would accommodate the Marines who are relocated to Guam from Okinawa as well as transient US Military forces and multi-national forces.
3. Firing Range types proposed for Tinian:
 - a. Rifle Known Distance Range (KD)
 - b. Automated Combat Pistol Range
 - c. Platoon Battle Course
 - d. Field firing range
4. Training would occur at least once per month with about 200-400 marines staying on Tinian for a 1 week period (5 days). 16 weeks of training estimated per year, however if you add the MIRC EIS plan, trainings would TOTAL to approximately 23 weeks of training per year.
5. No supporting facilities are proposed for the Tinian Ranges. Marines would bring all necessary equipment to the ranges.
6. Termination of the Leaseback Area lease agreement with the CNMI is recommended.
7. Tinian is the only island within the CNMI that the DOD has a training use agreement that would allow the weapons range development that would meet the purpose and need for training of the relocated Marines from Okinawa. – *need a copy of this “Training use agreement”.....(shore leave?)*
8. EIS admits that Tinian is the “only suitable location for this training for Marines based on Guam”.....provides ample negotiation power by CNMI/Tinian officials for mitigation purposes.
9. Critical documents for planning purposes:
 - a. Range Complex Management Plan 2006
 - b. Training Concept Plan, US Marine Forces Pacific 2008
 - c. Guam Joint Military Master Plan, Joint Guam Program Office (in progress)
 - d. CNMI Military Training Master Plan (in progress)
10. Range proposes to NOT use Tinian utilities and NOT use sewage treatment, all plans in the EIS are for “portable means”. Actual automated ranges would run on batteries charged by solar cells.
11. Live fire training could be at night and proposed time is between 7PM-6AM
12. Transportation to Tinian for training of 200-400 Marines would occur via air transport between Andersen AFB and Tinian International Airport. Equipment would be moved by barge.
13. Development of permanent and temporary quarantine inspection areas would be established on Tinian.
14. Feeding of military personnel is expected to be via MRE, food waste would be composted and packaging crushed and bailed for transport to Guam

15. Entire North Field Area would be gated and fenced and then closed during range use.
16. EIS briefly addresses liberty time (2.16), however only if “time permits”. However, a detailed week schedule of activities (Monday – Saturday) leaves no time for such liberty.
17. No storage of equipment or ammunition would occur on the ranges.
18. The EIS assumes that the agreement of grass cutting by the Tinian Mayor’s Office would continue and be “updated to include maintenance of the proposed ranges”
19. The EIS states that all emergency situations would be handled by the military to include fire prevention and protection as well as injury and medical treatments
20. Five security gates would be constructed as a part of the Tinian range plan, each with different configurations based on the 3 different alternative layouts of the proposed range plan.
21. The EIS warns that Tinian’s groundwater aquifers are vulnerable to contamination by substances introduced into the soil surface because of the porous soil and underlying limestone do not significantly impede the passage of contaminants to the shallow aquifers.
22. The alternative that the EIS is pushing for Tinian positions the ranges outside of the limestone that sits on the Tinian main aquifer. (Takapocho Limestone Areas)
23. The EIS acknowledges that munitions and explosive detonations could potentially result in Tinian soil contamination. However, the EIS assures that there will be range management policies put in place to “periodically” remove expended rounds and test the soil.
24. The EIS states that there will be no significant impact to the Geological and soil resources of Tinian and states that no mitigation efforts are necessary. (significant impact not addressed is access by local farmers to the LBA and therefore constrained access to fertile soil for agriculture.
25. An interesting note of the EIS is that it identifies the Tinian Airport as a Flood zone.
26. The EIS proposes to fill a wetland area on Tinian (Area C) located within the range footprint. However, they plan to mitigate the filling of the wetland with the creation of another or improving existing wetland areas on Tinian.
27. The EIS states that a monitoring program would be implemented to identify any early indications of lead contamination movement from expended rounds so that action could be taken to address any potential water quality impacts.
28. The EIS fails to address that although the ranges do not sit atop the Tinian main aquifer, the EIS does not confirm if water contaminants are prevented from traveling in streams or by other means to the main aquifer.
29. The EIS fails to address testing wetlands and ground water areas located outside of the range footprint but within the SDZ (surface danger zones). This creates a situation where expended rounds landing in the SDZ are never tested to measure water quality impact in the SDZ.
30. The EIS states that there will be “significant impact” to the Tinian Monarch due to the reduction of the Airport Mitigation Conservation Area.
31. The EIS states that there will be “significant adverse direct impacts” to 10 NRHP-eligible archaeological resources, “indirect impacts” to 55 NRHP-eligible

archaeological sites in the SDZ and the National Historic Landmark, and “indirect impacts” to 2 NRHP-eligible traditional cultural properties.

32. The EIS assumes no impact to air quality on Tinian, however no baseline data is provided nor future testing promised. There is also a lack of discussion regarding air quality impact from the discharge of weapons and or explosions in the range.
33. The EIS assumes no impact from noise based on modeling of sounds of weapons proposed for use on the Tinian ranges, however no baseline noise tests have been made to compare with proposed live fire expectations. Nor has any real life tests been done to test the sound wave impact to residential areas on Tinian.
34. The EIS states that there will be no flight pattern changes into and out of Tinian as the proposed ranges on Tinian would not require any amendments to FAA flight patterns.
35. The EIS mentions a “Tinian Land Use Master Plan” that has been created but is not yet completed by the Department of Public Lands.
36. The EIS states that existing leases (35 agriculture/grazing permits) within the leaseback area would be reviewed and potentially terminated. The EIS states that there will be no mitigation offered to this significant impact.
37. The EIS states that continued access to the National Historic Landmark (bomb pits, runway), northern beaches and IBB would be accessible through 8th Avenue through a series of safety checkpoints. Broadway would be closed during training.
38. In the EIS Recreational Resources section, it fails to identify the Tinian blow holes (2), Fisherman’s monuments, long beach or the Chamorro latte village trail at long beach.
39. There are no recommended mitigation efforts offered by the EIS for the impact on recreational resources located within the training range areas.
40. Mitigations offered by the EIS for Terrestrial Biological Resources are:
 - a. Brown Tree Snake Prevention Plan
 - b. Tropical monitoring of Avian Productivity and Survival surveys
 - c. Tinian Monarch Management plan
 - d. Reforestation
 - e. Establishment of a Forest Mitigation Area for the land taken for the range development. – to be overlapped on existing conservation “no wildlife disturbance” areas
 - f. Wildland Fire Management Plan and Resources – work with Local Fire Department
 - g. Micronesian Biosecurity Plan – prevent non-native species to Tinian
41. Denial of Cultural access to sites would occur during training periods from north of the existing Tinian Airport and south of Shinto Shrine Circle on Broadway including all lands to the east and east of 8th Avenue north of the airport and south of Chulu Beach. Restricted access would include restricting access to certain beaches and the blowhole which are located within the SDZs. Mitigations offered against that adverse impact to access to these areas would be public educational materials and displays about the history of Tinian.
42. The EIS identifies less than significant impact to Visual views from Mt. Lasso. Mt. Lasso, being a popular and MVA maintained tourist scenic point would be

- impacted by the large clearing of lands to the south of the view. Proposed mitigation suggests creating native flora to create a natural-appearing “green” around the cleared range areas, outside of the firebreaks/perimeter roads. Also, only clearing areas directly associated with the proposed firing ranges would be done. Since Mt. Lasso sits above the ranges, these mitigation efforts do not seem to address the visual impact of the range to the scenic view of Tinian. Therefore, other mitigation efforts must be done.
43. The EIS proposes that no improvements would be necessary to the Tinian roads, Tinian airport or the Tinian Harbor, therefore no mitigations are offered. However the EIS does not address the anticipated weight of vehicles that would be transferred on Tinian roads, nor does it address the possible impact due to the weights being carried by city roads. Federal Highway funds may be available to upgrade the Tinian city roads via DAR (defense access roads) for the purpose of transporting equipment and troops from the Tinian harbor and Tinian airport to the range sites.
 44. The EIS suggests alternatives for the dumping of portopotty waste: The EIS makes no mention of creating a wastewater treatment facility for the range.
 - a. Use existing DOD septic tank and leaching field on Tinian
 - b. Dispose at the Tinian Dynasty Wastewater treatment facility
 - c. Use existing IBB septic tank and leaching field
 - d. Build a new septic tank and leaching field
 - e. Utilize another privately owned septic tank and leaching field
 45. It should be noted that in the Socioeconomic section of the EIS, there are some factual errors with the dates of gaming implementation on Tinian. (1970’s and 1978)
 46. The construction phase of the Tinian range is expected to create a maximum of 180 construction jobs per year for a two year period. The EIS assumes that this would lead to the creation of about 35 indirect jobs in the Tinian economy. (multiplier)
 47. During the operational phase of the Tinian range it is expected that approximately 12-15 Tinian residents could be employed as security guards, grounds-keeping crew, and sanitation workers.
 48. The proposed action does not guarantee liberty for marines who are training while on Tinian therefore the EIS states that there will be no significant impact to the economy as a result of the training on Tinian.
 49. Mitigation for the potential loss of tourist access to the tourist sites which generate local revenue for businesses would be to “consider” granting liberty at the end of every training mission so that marines spend money in the local economy.
 50. The EIS suggests that the **CNMI Government** should apply for federal financial assistance for the development of a small museum dedicated to Tinian history as a possible mitigation for the loss of historical access to sites in North field.
 51. The Hazardous Materials and Waste section of the EIS notes that the Tinian Range could result in significant impact to human health and the environment. Approximately 4,480lbs of hazardous materials are expected to be imported to Tinian per year.

52. The Hazardous Materials and Waste section of the EIS notes that approximately 90,160lbs of hazardous waste would be created on Tinian as a result of the training activities.
53. No mitigation efforts are identified by the EIS as procedures expected to be put in place suggest that the impacts would be less than significant if the procedures are adhered to. (17-23)
54. The EIS does address the former Tinian Mortar Range (adjacent to the blow hole) that was left abandoned by the Navy. The site remains untested or environmentally remediated due to the UXO and possible chemical contamination. However no mention of impact or remediation is made in the EIS, even with the site categorized as an “Active DOD Hazardous Waste Site on Tinian” and ranked as a “Category 6” (high priority) site. Mitigation for future potential hazardous damage to Tinian should be offered by the EIS that immediately tests and remediates this Tinian Mortar Range in exchange for possible further hazardous damage to Tinian’s environment.
55. The Public Health and Safety portion of the EIS discusses no significant impacts as a result of training activities on Tinian, public notices are emphasized in the EIS in order to ensure safety on and in the surrounding areas of the ranges. This emphasis by the EIS creates an opportunity for the Municipality to mitigate possible lapses in public notices by seeking the military to assist in a public access radio or television station for Tinian. Currently, the EIS only calls for newspapers and public postings at least 1 week prior to training events. A full time devoted public access channel would be more acceptable.
56. Although the EIS does cover UXO from the WWII area, it fails to address possible UXO from rounds that fall in the SDZ during training exercises. A system needs to be in place to identify rounds fired within the range and those accounted for in the catchment devices for each range. Any difference in rounds fired and those found inside the active range footprint would mean rounds missing and possibly in or out of the SDZ. This creates a public health and safety issue not addressed in the EIS.
57. The EIS notes that Tinian’s poverty level is 4 times that of the US and two times that of Dededo, Guam. (48%)
58. EIS stated Tinian Demographics (2005):
 - a. Chamorro 44%
 - b. Filipino 32%
 - c. Chinese 9%
59. The Environmental Justice and Protection of Children section of the EIS fails to identify Guam as a contributor to disproportionate affects of project related impacts. For instance, Guam’s economy is due to have significant positive impacts to its economy due to its role in hosting the buildup, however Tinian would have a disproportionate affect of that same economic benefit while assuming a heavier environmental burden of hosting the live fire ranges.
 - a. President Clinton’s Executive Order (12898) stipulated that “no group of people, including a racial, ethnic, or a socioeconomic group, should bear a disproportionate share of the negative environmental consequences

resulting from industrial, municipal, and commercial operations or the execution of federal, state, local and tribal programs and policies.”

- b. The EIS as drafted does not combine Environmental justice impacts of Tinian and Guam and instead segregates them. – This could be a violation of the NEPA process.
 - i. It can be argued that Tinian is bearing a disproportionate share of negative environmental consequences due to the live fire ranges (when compared to Guam)
 - ii. It can also be argued that Tinian is bearing a disproportionate share of the economic benefits when compared to Guam.
 - iii. The Municipality should require a proportionate study that examines Tinian’s role and participation in the build up and proportionate it to Guam’s role, then based in the federal dollars expended or mitigation efforts created weigh the differences to see if there is adequate proportion of burden between the two islands.

CONTRACTING OPPORTUNITIES

- Grass cutting and vegetation control on ranges
- Removal of expended rounds and recycling/smelting
- Bus service from airport to range areas for marines
- Rental of portopotties
- Security of Gates and range inspection during non-training times
- Service of automated range equipment (electrical/mechanical maintenance)
- Environmental monitoring (soil testing)
- Tug Boat, barge and piloting services for the Tinian Harbor – movement of military equipment for the training activities 16-23 weeks per year
- Water sales to range (bottled and bulk)
- UXO disposal and investigations