

TINIAN CHAMBER OF COMMERCE

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Position Paper and Official Comments for the
**DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE
GUAM AND CNMI MILITARY RELOCATION**

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Approved and Ratified by the Tinian Chamber of Commerce Board of
Directors
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BACKGROUND

The Tinian Chamber of Commerce has been operating on the island of Tinian for over 25 years and currently consists of over 50 active members ranging from a large Casino/Hotel operation (*employs over 600 people*) to the small Donni Sali (hot pepper) single person harvesters. Although small in size, the Tinian Chamber of Commerce has very close relationships with the Guam Chamber of Commerce and the Saipan Chamber of Commerce and was a key developer of the Micronesia Council of Chambers of Commerce which will be established later this year. The Tinian Chamber of Commerce has also been very active with the US Military Build Up in the region. Involvements range from offering official comments when asked and working with the Joint Guam Program Office on expectations of future military developments on the island of Tinian. The Tinian Chamber of Commerce was also very involved in the Socio-Economic Impact Study conducted on Tinian and provided much of the research and historical data for the study.

STATEMENT OF SUPPORT

The Tinian Chamber of Commerce wishes to make it clear that our membership fully supports military investment on Tinian. Our comments offered below are meant to constructively point out unintentional consequences caused by the military's proposed action in this draft environmental impact statement and to offer solutions which will meet the expectations of businesses and residents on Tinian. The island of Tinian has endured over 30 years of pent up expectations for the military's use and development of the 18,000 acres of leased land on Tinian. Therefore we look forward as equal stakeholders, to ensure that both parties, the people of Tinian and the military, ensure that our future cohabitation and stewardship of Tinian is successful and enduring. Our submitted comments below are that first step toward that goal.

COMMENTS

I. DEIS Statement:

Transportation: 2.3.3.2 (pg 2-14)

"No new transportation infrastructure would be required for implementation of the proposed action at Tinian except bio-security quarantine and inspection areas would be constructed at arrival locations on Tinian"

Roadways and Marine Transportation 14.2.2 (pg 14-4)

"No new transportation infrastructure would be required for implementation of Alternative 1, (2 or 3) at Tinian"

"The additional traffic proposed by transporting equipment and ammunition from the airport to the ranges would not exceed the existing capacity of the roadways; impacts to roadways would be less than significant."

Tinian Chamber of Commerce CONCERN:

The Tinian Chamber of Commerce disagrees with the determination of "less than significant" for impacts to the roads and harbor as a result of the proposed action. Statements are assumed by the DEIS that current "capacity" of the harbor and road

infrastructure are adequate, however no studies or compaction (bore) tests are offered to determine if in fact the roads constructed in 1944 can withstand the additional and heavier loads required for equipment used in the range. Also, when addressing road utilization, the DEIS fails to identify which specific Tinian roads would be accessed or utilized when moving personnel and equipment from the airport or the harbor. If equipment is moved from the harbor to the RTA, then that equipment must move across city roads, the use of which was not addressed in the DEIS. To illustrate further, the DEIS fails to address the significant impact of diverting traffic from Broadway to 8th Avenue (during active range use). 8th Avenue lacks pavement to the East of the Tinian Airport runways, a significant oversight of the DEIS. Traffic would significantly be impacted as it would be diverted from a paved road (Broadway) to a non-paved road (8th Avenue) as a result of the action. This would mean tourist buses and traffic to IBB which currently travel on fully paved roads would be diverted to a road which lacks pavement. The action therefore is significant in nature. Lastly, the DEIS fails to identify the state of disrepair of the Tinian Harbor and uses 11 year old data to describe the harbor and its capacities. The state of the Tinian harbor described in the DEIS does not accurately reflect the current conditions or operations of the harbor and is therefore erroneous in its determination of no significant impact. A state of emergency was declared in October of 2009 by the Municipality of Tinian as well as the State Government in order to immediately repair the areas which pose a potential loss of life. This specific area is adjacent to the main quay and therefore would substantially impact future barge traffic. Initial studies have been done by a private contractor which have determined that the connecting dock is also unstable and could result in future collapse if not repaired. This would result in a main quay that is unprotected. In addition, similar to the “capacity” assumptions made for existing 1944 roadways, the DEIS assumes the same capacity capability for the harbor without structural testing or bore tests.

Tinian Chamber of Commerce SOLUTION:

1. The DEIS must identify the Tinian public access roads that military personnel and equipment related to range activity would travel on. This will provide a better understanding of traffic patterns and loads necessary on those identified roads which will be used for military access.
2. The DEIS must identify the types and weights of equipment, vehicles, trucks and munitions which will travel on the Tinian public access roads.
3. The DEIS should be amended to include supporting studies and tests which support the assumption of capacity measures for 66 year old infrastructure. Compaction and bore tests should be carried out on the roads identified for military access to the RTA as well as at the Harbor to ensure that loads do not collapse an already unstable infrastructure.
4. The DEIS should properly identify the differences between 8th Avenue and Broadway and offer acceptable mitigation efforts to lessen the significant impact of diverting traffic to a smaller, more damaged and unpaved road. (Broadway is 20’ wide vs. 8th Avenue being 9’ to 18’ wide / Broadway is fully paved vs. 8th Avenue partially paved / Broadway road condition suitable vs. 8th Avenue unsuitable) Significant impact is noted as 8th Avenue is partially unpaved (West of Tinian Airport) and significantly less wide (only 9’ wide lanes in areas South of the Airport and 18’ wide north of the

airport), which will cause direct impact to tourist bus traffic traveling North or South. Two way traffic, although tight can be accommodated with Broadway's 20' width, however two way traffic would not be possible on 8th Avenue's 9' width, especially when considering large 50 passenger buses which would be diverted to 8th Avenue due to the military's proposed action. The only solution is for the action to require mitigation in widening and improving 8th Avenue to accommodate the diverted traffic caused by the military's action.

II. DEIS Statement:

Noise 6.2.2 (pg 6-11)

"The noise contours would be entirely within the DOD-controlled land except for a small portion extending on the northern edge of the Tinian Airport property. In this case, no noise-sensitive receptors would be impacted, resulting in no noise impacts associated with this alternative (1)" "Since neither live-fire noise nor the other activities associated with Tinian would reach sensitive receptors, operational impacts due to airfield operations and live-fire training would result in no noise impacts.

Tinian Chamber of Commerce CONCERN:

The Tinian Chamber of Commerce disagrees with the DEIS' determination that there will be no noise impacts associated with the proposed action and challenges the determination based on noise modeling rather than actual live fire tests. The Tinian Chamber of Commerce has two major concerns with the finding of no noise impact by the DEIS. First, no real live fire tests are offered to confirm "modeled" expectations. The location of the ranges sits in a valley between Mt. Lasso and Pinã Plateau, residents and businesses are worried that the contour of the land surrounding the ranges will amplify the sound and/or direct the sound toward parts of Marpo Heights where Tinian residents live. The action does not discuss how the contours of the land or the funneling of sound due to the valley would affect how sound is carried throughout the island. Second, the DEIS fails to address the significant sound impact to parts of 8th Avenue. Since the DEIS mitigates denial of access on Broadway Avenue by diverting traffic to 8th Avenue, that stretch of road will now be within the 87 and 104dB PK threshold for all three alternatives. Therefore, the action would have significant impact on tourist buses which will be diverted to 8th Avenue due to actions required of the DEIS. The resulting action and noise impact would clearly be inconsistent with the Tourism theme, as tourists would essentially be driving adjacent to and within a very loud and active "war zone". Tourists would be left with memories not of the lush beauty and history of Tinian's northern part of the island but rather the shocking drive through a war zone, which would almost certainly provoke fear and frightening jolts as they drive north and south along 8th Avenue while the range is active. In addition, one of the tourist stops while traveling up 8th Avenue is Mt Lasso's vista point. Tourist would stop here as a part of their tour in order to partake in breathtaking views of Tinian's North Field and Saipan. This area is located within the noise impact zone for Alternative 1 and therefore mitigation efforts need to address the sound impact to this tourist site.

Tinian Chamber of Commerce SOLUTION:

1. The DEIS needs to verify noise modeling with actual real life test studies on Tinian. The action of conducting real life tests will either discredit the hypothesized noise

model or confirm its findings, results of which would be important for the military and civilians on Tinian. Costs associated with these live fire noise modeling tests would be rather inexpensive and quickly produce a reliable study which both the military and civilians could accept as factual and real.

2. The DEIS must offer mitigation efforts for the noise impacts overlooked by the noise study and identified by the Tinian Chamber of Commerce. Tourism is a large part of Tinian's economy and access to the historical and recreational sites are mandatory. However, access to the northern part of Tinian is being diverted by the action requirement of the DEIS to 8th Avenue, which lies within the noise impact areas. Mitigations for this impact is to coordinate the improvement of 8th Avenue (as offered above in the transportation mitigation solution) by moving 8th Avenue to the West outside of the noise impact area or possibly improving Riverside Drive on the Western Shore of Tinian to accommodate tourist and IBB traffic. Improving Riverside Drive could solve two concerns by the Tinian Chamber of Commerce: Inadequate capacity and Poor condition of 8th Avenue and the location of 8th Avenue within and adjacent to the SDZ and Noise Impact Area. Perhaps, the DEIS should include a study which would include the improvement of Riverside Drive.
3. The DEIS must offer mitigation efforts for the noise impact to the Mt. Lasso Vista point which will be used by tourists traveling up 8th Avenue. The Tinian Chamber of Commerce recommends that the mitigation for the noise impacts to the Mt. Lasso Vista point would be to relocate the Vista point north and outside the noise impact area. The funding necessary for this mitigation can also be coupled with a visitor's center that would interpret the historical sites located within the RTA which would have extremely limited or no access. Costs related to this mitigation should be the responsibility of the military.

III. DEIS Statement:

Recreational Resources 9.2.2 (pg 9-4, 9-5)

“Recreational resources on Tinian are situated primarily along the North Field, northwest shoreline, and southwest in the vicinity of San Jose village. The proposed structures associated with Alternative 1 implementation are not situated in the proximity of the existing recreational resources; as such, impediments to access are not expected.”

“The proposed actions are situated outside South Tinian. No disturbance to access to the existing recreational resources is anticipated.”

Tinian Chamber of Commerce CONCERN:

The DEIS omits significant recreational resources, Unai Dankulu/Long Beach which consists of over 10 beaches spread over a distance of 1.5 kilometers), and Unai Masalok (which consists of 3 beaches spread over a distance of .5 kilometer) (Unai Dankulu and Unai Masalak comprise a total of one third of the beach areas on Tinian.) Access would be impeded, recreational opportunities would be reduced, conflicts would be created and physical deterioration would occur. Unai Dankulu is the longest beach on Tinian and is a major tourist and resident recreational spot. In fact, on weekends both beaches are used by local families as a camp ground where their stay would be from 2-4 nights on average. The beaches are also one of the premier beaches for all types of fishing ranging from

spear fishing, net casting to rod and reel fishing. Additionally, located just 100 yards west of Unai Dankulu and Unai Masalok beaches are ancient (prehistoric) indigenous latte villages, which incorporate an interpretive trail with brass plaques describing what the hiker is seeing. Current access to these beaches and the ancient historical sites would be impeded by the installation of a fence and denial of access via the only paved road to the site, Broadway. The DEIS does not address how continued access would be granted to tourists and residents; nor does the DEIS address the impact the SDZ would have on that access. Alternatives 1, 2 and 3 (Fig. 2.5-1, 2, 3) illustrate how the SDZ area would actually impede access to the beaches via Broadway Avenue and the dirt access road which comes off of Broadway to the beaches, however no discussion is offered as to how traffic would be redirected in order to avoid the SDZ and not impede access to the beach. If the DEIS does not address these concerns, tourists and residents could have reduced access to the sites. It should also be noted that the location of the noise impact area includes direct noise impact to the current access road to Unai Dankulu and Unai Masalok. Therefore, the impact of live fire noise will have a significant impact to the site as well be in conflict with the purpose of the beach, which is to rest and relax.

Tinian Chamber of Commerce SOLUTION:

1. The DEIS should incorporate the significant impact to Unai Dankulu and Unai Masalok due to noise impact and lack of access. If Alternatives are left as is, then mitigation should be offered so that continued access to Unai Dankulu and Unai Masalok is not impeded. Mitigation suggested by the Tinian Chamber of Commerce would be to divert tourist and resident traffic to the Pinã dirt road which runs parallel to the Eastern Shore south of Unai Dankulu and Unai Masalok. The road must be paved and improved by the military as current access to Unai Dankulu from San Jose Village is 90% paved, with only the beach access road to the east of Broadway being unpaved. Since Broadway will no longer provide access to Unai Dankulu and Unai Masalok due to the SDZ, then the only mitigation acceptable it to divert access to a road which would be equal to or better than current paved access.

IV. DEIS Statement:

Contaminated Sites 17.1.1.4 (pg. 17.3

“Table 17.1-1 lists the active DOD hazardous waste site in Tinian (Tinian Mortar Range used from 1945-1994) that could be impacted by expanded training operations. Formal clearance of the munitions and explosives of concern (MEC) at the site has not been conducted. Site access and visitation is limited, however due to the presence of Unexploded Ordnance (UXO), the former Range is considered a Category 6 (High priority) site and as such determined to require remedial action.”

Tinian Chamber of Commerce CONCERN:

Since the DEIS identifies additional significant impact on Tinian due to the introduction of Hazardous Materials and Waste, it would seem appropriate that the DEIS offer as a mitigation measure, the HAZMAT clean up of the Tinian Mortar Range. The public and the business community are concerned that although the DEIS offers mitigation measures to protect Tinian’s environment from the introduction of Hazardous materials and waste, the document fails to offer the immediate clean up of the Tinian Mortar Range as a mitigation effort. It is difficult to accept the DEIS’ statement for its “promised”

establishment of BMP's and SOP's for the care of hazardous materials when there is already a glaring failure of environmental stewardship by the US Government via the Hazardous Waste site called the Tinian Mortar Range. The former utilized range, is simply fenced off and the hazardous materials are left on the Tinian land to contaminate the surrounding areas.

Tinian Chamber of Commerce SOLUTION:

1. The DEIS should offer as mitigation for its proposed action, the clean up of the Tinian Mortar Range. This will assure residents and businesses that the military is sincere about its stewardship of our island's environment.

V. DEIS Statement:

Typical Operating Scenario for Proposed Range Training Evolution on Tinian 2.3.3.3 (pg. 2-14)

"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 event."

Tinian Chamber of Commerce CONCERN:

A one week notice window is not enough time for tourists and residents to address their scheduling of activities for use of North Field areas. Tour operators and hotels are concerned that land tours which include access to areas within the SDZ would not be given enough time to notify their customers of a change of itinerary. Bookings for air charter flights from China for instance are done in some cases one month in advance which includes land tour packages. The land tour packages would include or not include certain tourist sites within the SDZ (Japanese Communications Building, Mt. Lasso Shrine, Long Beach, etc) based on the training schedule for the military. If only one week advance notice is provided, then it would be impossible to sell land tours in advance, thereby removing valuable historical tourist sites from the itinerary all together.

Tinian Chamber of Commerce SOLUTION:

1. The DEIS should extend notice of the use of the range to two weeks. The two week notice should be prior to the advance team landing to prepare the use of the range.

VI. DEIS Statement:

Civilian Range Access, Security and Safety 2.3.4.4 (pg. 2-18)

"It is anticipated that during periods of non-military use, the RTA could be available for other civilian purposes consistent with RTA policies, subject to management restrictions to protect public safety, property and the environment. These uses include the proposed landfill, the proposed wastewater treatment plant, and agency personnel access for natural and cultural resource surveys on Tinian. Periods of potential civilian use would need to be defined and regulated within RTA management procedures."

Tinian Chamber of Commerce CONCERN:

The DEIS fails to identify what RTA policies are envisioned for potential civilian access and use of the historical and recreational areas located in the RTA. This seems to be a violation of the NEPA process as continued access based on the RTA Management Procedure could directly create significant impacts to the use of the environment.

Tinian Chamber of Commerce SOLUTION:

1. The Tinian Chamber of Commerce recommends that the RTA Management Procedures be incorporated in the DEIS document so that impacts of the management procedures can be measured as an environmental impact.

VII. DEIS Statement:

Economic Impacts 16.2.2.1 (pg.16-18 & 16-19)

“Local stores and restaurants in San Jose would also benefit from the proposed action if the Marines in training are granted liberty, as has been the case in the past. However such liberty is not currently guaranteed for regular training exercises under the current description of proposed action. Liberty may be available to the advanced teams before and after training exercises, though these advanced teams would be much smaller and thus have a lesser economic impact.”

“Because of minimal opportunities for liberty, there would be few opportunities for direct military-civilian interaction.”

“To enhance economic benefits and compensate for economic costs for local businesses, the Marine Corps would consider granting trainees some liberty at the end of every training mission so that they might spend money in local establishments and interact with local residents.”

Tinian Chamber of Commerce CONCERN:

Since the DEIS clearly identifies the lack of positive economic impact and accurately notates the possible negative economic impacts due to lack of access to hunting, fishing and tourist sites, the Tinian Chamber of Commerce believes that the impact requires a guaranteed mitigation effort. Simply offering the “potential” for liberty is not enough and the requirement of liberty can and should be built into the training schedules.

Tinian Chamber of Commerce SOLUTION:

1. The Tinian Chamber of Commerce recommends that DEIS implement liberty time within the proposed training schedule and measure the economic impact of allowing 200-400 military personnel to have liberty in downtown Tinian. The Tinian Chamber of Commerce believes that if this liberty is measured in economic impact terms, that businesses and the community as a whole would benefit which in turn would translate into more support for the proposed action.

VIII. DEIS Statement:

Summary of Impacts Table 16.2-1 (pg 16-21)

“Significant adverse impacts to Tinian economy due to periodic access limitations to tourism-related sites, cattle grazing land and wild chili plants – economic costs may outweigh benefits”

Summary of Potential Mitigation Measures Table 16.2-2 (pg.16-22)

“CNMI could seek federal financial assistance for development of a small museum dedicated to Tinian’s history; to support Tinian’s tourism industry would further minimize economic impacts on the Tinian tourism industry.”

Tinian Chamber of Commerce CONCERN:

It is clear that tourism will be impacted by the military's proposed action. Tinian tourism will be directly impacted due to constrained and in some instances zero access to tourist sites. Tinian tourism will also be significantly impacted by the range sound impacts to the pristine and tranquil environment which in some cases overlaps tourist roads, beaches and historical sites. And lastly, Tinian tourism access to historical and recreational areas in the Northern part of Tinian will be diverted to non-paved roads, which would impede access by large tour buses. Since the DEIS clearly identifies the lack of positive economic impact and accurately notates the possible negative economic impacts, it seems misplaced as a mitigation measure to recommend the CNMI government mitigate negative actions caused by the military's action.

Tinian Chamber of Commerce SOLUTION:

1. The Tinian Chamber of Commerce recommends that the DEIS recognize and recommend that the mitigation for the loss of Tinian economic tourism activity be that the MILITARY pay for the development of a small museum dedicated to Tinian History. Since it is the military impeding access and since it is the military diverting tourist traffic, then it should be the responsibility of the military to offer mitigation through the military funding of the development of Tinian's first museum.

IX. DEIS Statement:

Economic Impacts 16.2.2.1 (pg.16-18)

"The military would terminate the grazing rights to build the proposed ranges, causing significant adverse economic impact. Tinian ranchers would have to utilize a diminished amount of available grazing land in the southern third of the island"

"Finally, loss of access to training areas would mean loss of local gathering access to the wild chili peppers locally know as donnisali, a Tinian Export. However, any chili plants in the southeast quadrant of the military lease area would be either up-rooted during grading or be located in the Surface Danger Zone (SDZ), where access would be restricted during proposed training activities."

Summary of Impacts Table 16.2-1 (pg 16-21)

"Significant adverse impacts to military-civilian relations because, during training exercises, local residents would lose access to popular beaches, fishing spots, and the memorial crosses at the north tip of the island on religious holidays; less than significant social impacts in all social aspects during construction."

Tinian Chamber of Commerce CONCERN:

Negative Economic impacts are of major concern for the Tinian Chamber of Commerce. Specifically, the negative impacts to gazing and donni sali harvesting, the Tinian Chamber of Commerce objects to the glaring lack of mitigation efforts offered for the adverse impact to these industries.

Revocation of Tinian grazing permits: The DEIS clearly identifies significant impact to 35 grazing permits, which will be cancelled as a result of the proposed action by the military. Significant investments of time, labor and financial resources were expended by these 35 livestock ranchers and a unilateral cancelling of leases held does

not seem fair or acceptable to the Tinian Chamber of Commerce. Additionally, the DEIS fails to identify current infrastructure such as paved roads which provide access to the gazing lease areas which would be relocated as a result of the military's proposed action. The DEIS offers no mitigation efforts for the loss of investment or the road improvements for future identified relocation sites for the 35 grazing pastures. The Tinian Chamber of Commerce believes that any relocation effort should include the military's involvement through mitigation efforts offered below.

Loss of access to donni sali harvesting areas: The DEIS clearly identifies significant impact to the donni sali export industry. Tinian is well known throughout the region as a top hot pepper producer and its namesake separates Tinian Hot Pepper from other peppers produced on other islands due to the spiciness of the pepper grown exclusively on Tinian. In fact the Marianas Visitor's Authority holds an annual government sponsored event which promotes the Tinian Hot Pepper industry called "The Tinian Hot Pepper Festival". For decades, significant time, labor and financial resources both publicly and privately funded have been developing this emerging export industry for Tinian, however the DEIS fails to identify the significance of this industry and fails to offer an equitable mitigation for "uprooting" or "denying access" to 2/3rds of the donni sali crops which are located within the proposed RTA and SDZ. The Tinian Chamber of Commerce believes that a significant mitigation effort should be offered by the DEIS to account for the potential collapse of a viable export industry on Tinian due to the impact of the proposed action of the military..

Tinian Chamber of Commerce SOLUTION:

1. The Tinian Chamber of Commerce recommends that the DEIS offer the military's assistance in relocation efforts for the terminated lease holders through the coordination of military training exercises which would involve surveying and parceling new public land in the Southern portion of Tinian. (With the cooperation of the CNMI Department of Public Lands) Additionally, the military could offer the manpower and equipment necessary (via sanctioned training exercises) to relocate the gazing fences and infrastructure invested by the lease holders, which would be required to be removed as a result of the military's proposed action. This proposed mitigation action, although not legally required by the existing grazing lease agreements, would nonetheless ease the social impacts of a military forcing ranchers off their lands and instead exemplify the military's willingness to work with the community and its residents.
2. The Tinian Chamber of Commerce recommends that the DEIS offer paved road access mitigation to offset the potential impact of relocating livestock ranchers to areas on Tinian where no paved road access exists. Currently, both 8th Avenue and Broadway Avenue provide ample paved road access to the leased grazing areas, the proposed cancellation of the grazing leases would force the CNMI Department of Public Lands to relocate the grazing permit holders to areas where no paved roads exist. The military could mitigate the negative impact of such a relocation by offering, in conjunction with item 1 above, to pay for the development and construction of a new road to the site selected by the CNMI Department of Public Lands to relocate the ranchers.

3. The Tinian Chamber of Commerce recommends that the DEIS offer to fund a donni sali cultivation project and study, which could transplant existing mature donni sali plants located within the RTA and the SDZ to the southern portion of Tinian and develop the planting and development of a new harvesting area in the southern part of Tinian. The military funds similar mitigation efforts which involve the displacement or demolition of endangered plants and animals, therefore, since the DEIS has identified a significant impact to this export industry on Tinian, the Tinian Chamber of Commerce recommends that the military fund an equitable program which compensates Tinian for the loss of an emerging export industry.

X. DEIS Statement:

Economic Impacts 16.2.2.1 (pg 16-18)

“There is a “possibility” that 12 to 15 Tinian residents could be employed as security guards, grounds-keeping crew, and sanitation workers to support the proposed action on Tinian. Those direct jobs would constitute a less than significant impact, falling short of the calculated 31.5-job mark.”

Tinian Chamber of Commerce CONCERN:

The Tinian Chamber of Commerce is concerned that the military’s proposed action lacks community driven focus. It would seem that if the military’s plan is to build a live fire range on a peaceful and beautiful tourist concentrated island, that the military would investigate and implement policies which bring it closer to the Tinian community and its people. One must admit, that the proposed military action and the possible environmental consequences is already a “hard sell” to the people of Tinian, yet not enough thought or concern was given to the people of Tinian in this DEIS. Glaringly evident is the statement that “possibly” 12 to 15 jobs would be created in return for the series of negative significant impacts of the proposed action of a live fire range on Tinian. To illustrate further, the DEIS does not identify high paying jobs such as range management positions, electrical repair technicians, software programmers or heavy equipment operators, all of which are a regular position involved in live fire ranges. Instead, the DEIS offers minimum wage level jobs such as security guards, grounds-keeping crew and sanitation workers. There is also a significant difference in expectations from the community regarding jobs created by the proposed military action. The Tinian Chamber of Commerce estimates that expectations in the community are between 100-200 jobs, however realistic expectations that that Tinian Chamber of Commerce supports are 50-75 jobs, which would include all levels of employment not just the minimum wage jobs.

Tinian Chamber of Commerce SOLUTION:

1. The Tinian Chamber of Commerce recommends that the DEIS reevaluate job expectations for the proposed action and look at possible private range operating (range control) contracts which would localize and expand job opportunities for the people of Tinian. Currently, the DEIS calls for advance teams, presumably military personnel, who would prepare the live fire range for a scheduled exercise. Since this (Guam/CNMI Military Relocation) proposed action anticipates 16 weeks of training and the MIRC anticipates an additional 10-12 weeks of training on Tinian, it would seem more economical for the military to privatize the management of the range

operations. This way the range activity could be managed by a private firm and more job opportunities could be offered to locals on Tinian. The Tinian Chamber of Commerce considers this the best mitigation effort the military's action can offer as it will have direct positive impact to job opportunities on the island of Tinian.