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RE: Public Comment Submission: revised Divert Activities and Exercises Revised Draft Environmental Impact Statement (EIS)

The revised draft EIS fails to meet EIS public outreach requirements.

The purpose of the National Environmental Protection Act (NEPA) is to promote informed decision-making by federal agencies by making "detailed information concerning significant environmental impacts" available to both agency leaders and the public. The proposed Divert Activities and Exercises are to take place in the Commonwealth of the Northern Mariana Islands (CNMI) where English is a second language for the majority of the public. The majority of the permanent local population are ethnic Chamorro and Refaluwasch. Yet revised draft EIS is provided only in the English language. This is despite numerous calls in recent years and even recent months for the agencies under the DOD to provide EIS documents in Chamorro and Carolinian languages. The USAF failed to fulfil its requirement under NEPA to inform the public by not providing translations of the EIS in local languages. The consequences of this failing is that many people in the community, those who cannot read English or who have difficulty reading and comprehending materials written in English, cannot understand and evaluate the implications and impacts of the proposed activities. They are effectively disenfranchised and excluded from the NEPA process. The EIS must be redone in local languages and an effective outreach program designed with measures in place to ensure success must be conducted.

The intent and spirit of NEPA's public outreach requirements is to ensure the local government and public's full understanding of the nature and impacts of proposed activities and to encourage their participation in the decision making process by providing their perspectives and concerns. It is contrary to this intent and spirit for the USAF to present information in such a way as to be misleading and to make their intent obscure. The USAF states in ES 5. Preferred Alternative, "The USAF does not identify or determine a preferred alternative in this Revised Draft EIS." This statement is misleading. It implies that the USAF does not have a preferred alternative when in actuality, based on the public discussion at the USAF open house on Saipan, it is clear that the USAF prefers Alternative 1 – Modified Saipan Alternative and Alternative 3 – Hybrid Modified Alternative in that order. By not stating a preferred alternative in the revised draft EIS, the USAF both avoids a more detailed discussion in the EIS as to why it prefers the Saipan alternatives and leads CNMI government leaders and the public to the false assumption that the USAF will accept the local community's strong preference for Alternative 2 – Modified Tinian Alternative. As a result, it can be expected that there will be less apparent public opposition to the USAF plans both in public debate and comments submitted. Whether this is intentional manipulation or not, the result is the same. The seriousness of the impacts to the CNMI community is downplayed when attention is diverted away from those alternatives that the community does not support. The USAF's choice of an alternative in its Record of Decision will be based in part on this community response. To comply

with NEPA's intent and spirit the EIS must be redone with the USAF's preferred alternatives clearly named and the reasons for the preference fully discussed.

The U.S. military has intentionally broken its large-scale development of the Mariana Islands and surrounding waters into the world's largest live-fire training range into multiple proposals with the resulting effect of misleading the public and minimizing apparent impacts.

Prior to the approval of the Mariana Islands Range Complex (MIRC) proposal in 2010, the U.S. military already held extensive areas of the Marianas. This include fully half of the northern third of Guam along with huge areas in the south, including the island's only lake, most of the land around Apra Harbour, and numerous other large areas of Guam that, together, make up a third of Guam's entire land mass. Here in the CNMI, they held a long-term lease on two thirds of Tinian, land around Tanapag Harbour and the entire island of Farallon de Medinilla.

The MIRC created a half-million-square nautical mile live-fire training range that surrounds Guam, Rota, Tinian, Saipan and all but the furthest islands to the north. The MIRC authorized live-fire on and in the land, air, and sea throughout the training range. It also expanded the small-arms scope of the Tinian ranges into four range complexes inclusive of artillery, grenade, and high-impact zones.

On July 30, 2015 the U.S. Navy announced its Record of Decision for another proposal—the Mariana Islands Training and Testing Area (MITT) that doubled the area of the MIRC to nearly a million square nautical miles. It also greatly increased the level of the Navy's deadly sonar and live-fire ordnance testing and training in CNMI waters. The MITT plan allows the Navy to damage or kill over 6 square miles of endangered coral reefs plus an additional 20 square miles of coral reef around FDM through the use of highly explosive bombs. It ups the rate of explosive bombing from 2,150 bombs per year to over 6,000 bombs per year, increasing the Navy's bombing of FDM by roughly 300 percent.

On Sept. 2, 2015, the Navy signed the Record of Decision for another proposal, the Guam and CNMI Military Relocation proposal, approving a new Marine Base in Guam, a new Live-Fire Training Range Complex, or LFTRC, and a separate hand-grenade range.

Another separate proposal is the CNMI Joint Military Training (CJMT) proposal that would allow the military to use two-thirds of Tinian for their second highest level of live-fire training range and to take the entire island of Pagan and use it for their highest level of live-fire training.

Taken together, these proposals surround the CNMI with live-fire ranges; in Guam to the south; Tinian in the west, FDM and Pagan to the north, and all around us on and in the ocean.

The proposed Divert Activities and Exercises is another US Military expansion. It's primary purpose is training. It will move more land and airspace from CNMI government jurisdiction to the USAF.

The Divert Activities and Exercises EIS is presented independent of other training related proposed and recently approved activities. Yet it is clearly and intimately related to them, particularly the MERC and MITT that will involve nearly a million square miles of ocean around the Marianas, large patches of airspace above and near CNMI islands, and live-fire aerial bombardment of FDM island. In fact, while the EIS ignores this relationship, it inadvertently reveals this relationship when the EIS refers readers who want to understand how the Divert Activities and Exercises proposal effects other military training operations to the EIS documents of the MERC/MITT proposals.

The MIRC, MITT, Guam and CNMI Relocation, LFTRC, CJMT and Divert Activities and Exercises all contribute to the creation of the world's largest live-fire training range. Breaking them into separate

activities with their own independent EIS disclosures has for all intents and purposes allowed the Navy, Air Force and Marines to circumvent the intent of the NEPA process. Public and government stakeholders were unaware of the full extent of the military's intentions. The cumulative impacts were thereby obscured. Decision makers in the U.S. military who approve each proposal, do so based in part upon the feedback and comments of stakeholders – in this case under-informed stakeholders.

The Divert Activities and Exercises must be abandoned and a new proposal drafted that accurately describes the U.S. military's large-scale live-fire training expansion in the Marianas so that stakeholders may understand and comment on the cumulative impacts as required by NEPA.

The proposed activities will have a negative impact on the local tourist industry.

The main economic engine of the CNMI is its tourist industry. Tourists come to the CNMI to see a Micronesian island and to experience its land, waters and people. In many ways, the tourist experience is our product and its value depends upon a continuing positive visitor experience, from the moment a tourist arrives in the CNMI to the moment that tourist boards a plane home. Tourists choose their destinations based on many factors. We know from 40 years of interactions with our tourists is that our history is important to them; our ancient history, our colonial period history, and our World War II history where our islands played a prominent role in Japanese and American history.

Anything that diminishes our image as a small Micronesian island damages our tourist product. Anything that destroys or diminishes our historic properties damages our tourist product.

The proposed activities will result in loss and damage to World War II historic areas and buildings. They will change the initial impressions of tourists as they arrive at Saipan International Airport. The drive from the airport is currently along a green belt dotted with historic buildings. Visitors "feel" like they've arrived on a small Micronesian island. The Japanese buildings and bunkers provide a glimpse of World War II. The two alternatives that involve the use of land around Saipan's airport will change this aspect and initial experience. We will lose green areas to paved tarmac and parked military aircraft. We will lose peace and quiet to jet noise from military training exercises. Tourists will also suffer delays and added air travel time and expense as a result of commercial flight having to accommodate regular military aircraft use of our airport and airspace.

The proposed activities will not only damage our historic assets, but they are contrary to the intent of Executive Order (EO) 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. The CNMI community is overwhelmingly ethnic minorities and the CNMI is a low-income community with one of the highest levels of poverty in the United States. The proposed activities will put an unfair burden on our community.

Because the proposed activities will damage our historic properties and otherwise have a negative impact on the tourist experience when tourism is our primary industry and our main source of self-generated income, the proposed activities should not move forward.

The Tinian lease area is incorrectly excluded from consideration.

The northern two thirds of Tinian currently under lease to the DoD was excluded from consideration as a potential divert airfield location because it lacks "existing infrastructure". This requirement of existing infrastructure is arbitrary. Infrastructure can be built by the USAF. Further, use of the lease area for the divert airfield is an appropriate, productive use of the Tinian lease area. The area

obviously has merit for use as an airfield since it includes the old World War II airfields. If the reason for the requirement of existing infrastructure is the cost of building such infrastructure, then it begs the question, "how important can the divert airport be for the USAF if it is not willing to pay the costs of renovating and providing infrastructure?". If it is not important enough to spend the money, then asking the CNMI to give up land for the divert project seems unreasonable. It is essentially asking the CNMI government to subsidize a USAF project that is not important enough for the USAF to spend its own, far greater financial resources on.

Alternative sites outside the CNMI are arbitrarily excluded.

The revised draft EIS states that a divert airfield is needed "...in the event of a disruption of operational capabilities at Andersen AFB or other western Pacific locations." This implies that there are other airfields in other western Pacific locations. The EIS needs to list all other Pacific location, including non-USA locations and explain why each cannot meet the need. The EIS should also consider alternative new airfields that could potentially be built on foreign soil.

The USAF's justification for the Divert Activities and Exercises project is not compelling as most of the needs cited are already met. The project appears to be a desired but unnecessary expansion of existing capability.

- Emergency response justification should be removed entirely. FAA Airport Sponsor Assurance C. 27 already authorizes the use of any of the CNMI's commercial airports in an emergency.
- Divert landings already occur at A.B. Won Pat International Airport, Guam; Saipan International Airport, and Rota International Airport.
- Currently, planned joint military exercises occur within the MIRC and Mariana Islands using Andersen AFB and the surrounding airspace and range area. It is unclear why it is necessary to also provide support from Saipan or Tinian.
- Humanitarian airlift staging can already occur at Andersen AFB or A.B. Won Pat International Airport, Guam. FAA Airport Sponsor Assurance C. 27, allows for use of Saipan International Airport and Tinian International Airport as well.
- The DoD has 30 million acres that it currently uses for training purposes*. It is difficult to imagine that they need to take additional land from the CNMI to meet its training land needs. The CNMI only has 177 square miles of land. Of this, the US Military already controls 30.4 square miles. This is in addition to the 1/3 of Guam's entire landmass that is under military control.

The CNMI is a poor choice of location for staging a humanitarian aid effort.

While the need to support emergency humanitarian efforts is cited as justification for establishing a divert airfield in the CNMI, the CNMI has few local resources to support any significant emergency humanitarian aid effort. Guam, where there are far more of the materials, supplies and resources required and on hand for such an effort is a far better choice. The CNMI can offer only limited support and in fact, Rota, Tinian and Saipan airports are already available for humanitarian assistance via FAA Airport Sponsor Assurance C. 27. Further, the CNMI government is highly unlikely to deny use over the limits of C. 27 in a true emergency.

Sincerely,

Peter J. Perez
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Member Alternative Zero Coalition

*source: <https://www.serdp-estcp.org/Program-Areas/Resource-Conservation-and-Climate-Change/Natural-Resources>