

# APPENDIX G

## Public Involvement and Comments



**APPENDIX G**  
**PUBLIC INVOLVEMENT AND COMMENTS**

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# NOTICE OF INTENT



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more beneficiary countries. This preferential treatment is also available for apparel articles assembled in one or more lesser-developed beneficiary sub-Saharan African countries, regardless of the country of origin of the fabric used to make such articles, subject to quantitative limitation. Title VI of the TRHCA 2006 extended this special rule for lesser-developed countries through September 30, 2012.

The AGOA Acceleration Act of 2004 provides that the quantitative limitation for the twelve-month period beginning October 1, 2011 will be an amount not to exceed 7 percent of the aggregate square meter equivalents of all apparel articles imported into the United States in the preceding 12-month period for which data are available. See Section 112(b)(3)(A)(ii)(I) of TDA 2000, as amended by Section 7(b)(2)(B) of the AGOA Acceleration Act of 2004. Of this overall amount, apparel imported under the special rule for lesser-developed countries is limited to an amount not to exceed 3.5 percent of all apparel articles imported into the United States in the preceding 12-month period. See Section 112(b)(3)(B)(ii)(II) of TDA 2000, as amended by Section 6002(a) of TRHCA 2006. Presidential Proclamation 7350 of October 2, 2000 directed CITA to publish the aggregate quantity of imports allowed during each 12-month period in the **Federal Register**.

For the one-year period, beginning on October 1, 2011, and extending through September 30, 2012 the aggregate quantity of imports eligible for preferential treatment under these provisions is 1,877,430,342 square meters equivalent. Of this amount, 938,715,171 square meters equivalent is available to apparel articles imported under the special rule for lesser-developed countries. Apparel articles entered in excess of these quantities will be subject to otherwise applicable tariffs.

These quantities are calculated using the aggregate square meter equivalents of all apparel articles imported into the United States, derived from the set of Harmonized System lines listed in the Annex to the World Trade Organization Agreement on Textiles and Clothing (ATC), and the conversion factors for units of measure into square meter equivalents used by the United States in implementing the ATC.

**Kimberly Glas,**

*Chairman, Committee for the Implementation of Textile Agreements.*

[FR Doc. 2011-24853 Filed 9-26-11; 8:45 am]

BILLING CODE 3410-DS-P

## DEPARTMENT OF DEFENSE

### Office of the Secretary

#### Membership of the Defense Contract Audit Agency Senior Executive Service Performance Review Boards

**AGENCY:** Defense Contract Audit Agency, Department of Defense (DoD).

**ACTION:** Notice of Membership of the Defense Contract Audit Agency Senior Executive Service Performance Review Boards.

**SUMMARY:** This notice announces the appointment of members to the Defense Contract Audit Agency (DCAA) Performance Review Boards. The Performance Review Boards provide fair and impartial review of Senior Executive Service (SES) performance appraisals and make recommendations to the Director, DCAA, regarding final performance ratings and performance awards for DCAA SES members.

**DATES:** *Effective Date:* Upon publication of this notice.

#### FOR FURTHER INFORMATION CONTACT:

Sandra L. Burrell, Chief, Human Resources Management Division, Defense Contract Audit Agency, 8725 John J. Kingman Road, Suite 2133, Fort Belvoir, Virginia 22060-6219, (703) 767-1039.

**SUPPLEMENTARY INFORMATION:** In accordance with 5 U.S.C. 4314(c)(4), the following are the names and titles of DCAA career executives appointed to serve as members of the DCAA Performance Review Boards.

Appointees will serve one-year terms, effective upon publication of this notice.

#### *Headquarters Performance Review Board:*

Ms. Karen Cash, Assistant Director, Operations, DCAA; chairperson.

Mr. Kenneth Saccoccia, Assistant Director, Policy and Plans, DCAA; member.

Mr. Donald McKenzie, Assistant Director, Integrity & Quality Assurance, DCAA; member.

#### *Regional Performance Review Board:*

Mr. David Eck, Regional Director, Mid-Atlantic, DCAA; chairperson.

Mr. Ronald Mullinax, Regional Director, Western, DCAA; member.

Mr. Ronald Meldonian, Regional Director, Northeastern, DCAA; member.

Dated: September 22, 2011.

**Aaron Siegel,**

*Alternate OSD Federal Register Liaison Officer, Department of Defense.*

[FR Doc. 2011-24789 Filed 9-26-11; 8:45 am]

BILLING CODE 5001-06-P

## DEPARTMENT OF DEFENSE

### Department of the Air Force

#### Notice of Intent To Prepare an Environmental Impact Statement For Divert Activities and Exercises, Guam and Commonwealth of The Northern Mariana Islands

**AGENCY:** Headquarters Pacific Air Forces, United States Air Force, DoD.

**ACTION:** Notice of Intent.

**SUMMARY:** Pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S.C. 4321, *et seq.*), the Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 CFR parts 1500-1508), and U.S. Air Force (USAF) Environmental Impact Analysis Process (32 CFR part 989), the USAF is issuing this notice to advise the public of its intent to prepare an Environmental Impact Statement (EIS) for Divert Activities and Exercises, Guam and Commonwealth of the Northern Mariana Islands.

The proposed divert activities and exercises would involve airfield improvements designed to provide additional divert capability for various military aircraft operating as part of joint training exercises, humanitarian assistance activities, and disaster relief operations for northeast Asia. The proposed action would include the development and construction of facilities and infrastructure designed to support up to one tanker squadron of 12 KC-135 aircraft and its approximately 500 support personnel. This proposed action includes divert activities and exercises involving a tanker squadron, as well as USAF, U.S. Navy, or other military aircraft operating in the region, and ideally would require a 10,000-foot runway. Components of the proposal include a cargo pad; an expanded runway area; new taxiways, aprons, and shoulders; 6,000-square foot maintenance facility; jet fuel receiving, storage, and delivery capability; and associated pavement markings, lighting, security, and other related infrastructure.

The possible alternatives for the divert airfield capability include the international airports on Saipan, Tinian, Rota, or other reasonable alternatives developed during the scoping process. Guam International Airport, as an existing divert location, will be considered in this EIS, as part of the no action alternative.

The Air Force is in the process of inviting potential Cooperating Agencies to participate in aspects of the EIS development as appropriate or required.

# NOTICE OF AVAILABILITY



consider to be CBI or otherwise protected through <http://www.regulations.gov> or email. The <http://www.regulations.gov> Web site is an "anonymous access" system, which means EPA will not know your identity or contact information unless you provide it in the body of your comment. If you send an email comment directly to EPA without going through <http://www.regulations.gov>, your email address will be automatically captured and included as part of the comment that is placed in the public docket and made available on the Internet. If you submit an electronic comment, EPA recommends that you include your name and other contact information in the body of your comment and with any disk or CD-ROM you submit. If EPA cannot read your comment due to technical difficulties and cannot contact you for clarification, EPA may not be able to consider your comment. Electronic files should avoid the use of special characters, any form of encryption, and be free of any defects or viruses. For additional information about EPA's public docket visit the EPA Docket Center homepage at <http://www.epa.gov/epahome/dockets.htm>.

All documents in the docket are listed in the <http://www.regulations.gov> index. Although listed in the index, some information is not publicly available, e.g., CBI or other information whose disclosure is restricted by statute. Certain other material, such as copyrighted material, will be publicly available only in hard copy. Publicly available docket materials are available either electronically in <http://www.regulations.gov> or in hard copy at the OEI Docket in the EPA Headquarters Docket Center.

**FOR FURTHER INFORMATION CONTACT:** For information on the federal docket, contact the Office of Environmental Information Docket; telephone: 202-566-1752; facsimile: 202-566-9744; or email: [ORD.Docket@epa.gov](mailto:ORD.Docket@epa.gov).

For information on the public listening session, please contact Christine Ross, IRIS Staff, National Center for Environmental Assessment, (8601P), U.S. EPA, 1200 Pennsylvania Avenue NW., Washington, DC 20460; telephone: 703-347-8592; facsimile: 703-347-8689; or email: [IRISListeningSession@epa.gov](mailto:IRISListeningSession@epa.gov).

If you have questions about the document, contact Audrey Galizia, National Center for Environmental Assessment (NCEA); telephone: 732-906-6887; facsimile: 732-452-6429; or email: [FRN\\_Questions@epa.gov](mailto:FRN_Questions@epa.gov).

Dated: May 24, 2012.

**Darrell A. Winner,**  
Acting Director, National Center for  
Environmental Assessment.

[FR Doc. 2012-13825 Filed 6-7-12; 8:45 am]

**BILLING CODE 6560-50-P**

## ENVIRONMENTAL PROTECTION AGENCY

[ER-FRL-9003-4]

### Environmental Impacts Statements; Notice of Availability

*Responsible Agency:* Office of Federal Activities, General Information (202) 564-7146 or <http://www.epa.gov/compliance/nepa/>.

Weekly receipt of Environmental Impact Statements

Filed 05/29/2012 Through 06/01/2012 Pursuant to 40 CFR 1506.9.

#### Notice

Section 309(a) of the Clean Air Act requires that EPA make public its comments on EISs issued by other Federal agencies. EPA's comment letters on EISs are available at: <http://www.epa.gov/compliance/nepa/eisdata.html>.

**SUPPLEMENTARY INFORMATION:** EPA is seeking agencies to participate in its e-NEPA electronic EIS submission pilot. Participating agencies can fulfill all requirements for EIS filing, eliminating the need to submit paper copies to EPA Headquarters, by filing documents online and providing feedback on the process. To participate in the pilot, register at: <https://cdx.epa.gov>.

*EIS No. 20120172, Final EIS, BLM, WV,* East Lynn Lake Coal Lease Project, To Offer Federal Coal in the Coalburg/Winifrede Seam for Competitive Leasing, Wayne County, WV, *Review Period Ends:* 07/09/2012, *Contact:* Chris Carusona 414-297-4463.

*EIS No. 20120173, Draft EIS, FHWA, TX,* South Padre Island Second Access Project, State Highway 100, Across the Laguna Madre, To Park Road 100, Construction of a New Location Highway Facility, USACE Section 10 and 404 Permits, Cameron County, TX, *Comment Period Ends:* 08/15/2012, *Contact:* Gregory Punske 512-536-5960.

*EIS No. 20120174, Final EIS, FHWA, MD,* US 50 Crossing Study, Transportation Improvement from MD-611 to MD 378; and 3rd Street to Somerset Street, Funding, USACE Section 10 and 404 Permits, Worcester County, MD, *Review Period Ends:* 07/09/2012, *Contact:* Nicholas Blendy 302-734-2966.

*EIS No. 20120175, Draft EIS, USFWS, DE,* Prime Hook National Wildlife Refuge, Development of a Comprehensive Conservation Plan, Implementation, Sussex County, DE, *Comment Period Ends:* 08/06/2012, *Contact:* Thomas Bonetti 413-253-8307.

*EIS No. 20120176, Second Final Supplement, USN, 00,* Surveillance Towed Array Sensor System Low Frequency Active (SURTASS LFA) Sonar Systems, Updated and Additional Information on Employment of Four SURTASS LFA Sonar Systems for Routine Training, Testing, and Military Operation, Implementation, *Review Period Ends:* 07/09/2012, *Contact:* CDR R.A. Dempsey 703-695-8266.

*EIS No. 20120177, Draft EIS, USAF, 00,* Divert Activities and Exercises, Guam Commonwealth of the Northern Mariana Islands (CNMI), To Improve existing Airport(s) and Associated Infrastructure in the Mariana Islands and To Achieve Divert Capabilities in Western Pacific, Mariana Islands Region, *Comment Period Ends:* 07/23/2012, *Contact:* Jay Nash 703-693-4001.

*EIS No. 20120178, Final EIS, APHIS, 00,* Glyphosate-Tolerant H7-1 Sugar Beet, Request for Nonregulated Status, United States, *Review Period Ends:* 07/09/2012, *Contact:* Rebecca Stankiewicz Gabel 301-851-3927.

*EIS No. 20120179, Final EIS, DOE, CA,* Energia Sierra Juarez U.S. Transmission Line Project, Construction, Operation, Maintenance, and Connection of Either 230-Kilovolt or a 500-Kilovolt Electric Transmission Line Crossing U.S.-Mexico Border, Presidential Permit Approval, San Diego County, CA, *Review Period Ends:* 07/09/2012, *Contact:* Brian Mills 202-586-8267.

*EIS No. 20120180, Final EIS, USN, HI,* Basing of MV-22 and H-1 Aircraft in Support of III Marine Expeditionary Force (MEF) Elements, Construction and Renovation of Facilities to Accommodate and Maintain the Squadrons, HI, *Review Period Ends:* 07/16/2012, *Contact:* 808-472-1196.

*EIS No. 20120181, Final EIS, WAPA, AZ,* Grapevine Canyon Wind Project, Proposal to Develop a Wind Energy Generating Facility up to 500 Megawatts: (2) a 345 Kilovolt (kV) Electrical Transmission Tie-Line; and (3) a 345-kV Electrical Interconnection Switchyard, Coconino County, AZ, *Review Period Ends:* 07/09/2012, *Contact:* Matt Blevins 800-336-7288.

# NEWSPAPER ADVERTISEMENT

## NOTICE OF AVAILABILITY NOTICE OF PUBLIC HEARING

### DRAFT EIS FOR DIVERT ACTIVITIES AND EXERCISES, GUAM AND COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

The U.S. Air Force (USAF) announces the availability of the Draft Environmental Impact Statement (EIS) for Divert Activities and Exercises, Guam and Commonwealth of the Northern Mariana Islands (CNMI) for public review. The Draft EIS is available for download on the project website address listed below.

The USAF requests comments on the Draft EIS and will host open public hearings on the islands of Saipan and Tinian. The proposed action analyzed in the Draft EIS is to improve an existing airport or airports and associated infrastructure in the Mariana Islands region in support of expanding mission requirements and to achieve divert capabilities in the western Pacific. The proposed airfield and infrastructure improvements would be designed to support a combination of cargo, fighter, and tanker aircraft and associated support personnel for divert landings, periodic exercises, and humanitarian assistance and disaster relief activities. Proposed facilities would be used on an as-needed basis and would not be used as a permanent full-time beddown or installation location. Saipan International Airport and Tinian International Airport are considered alternative locations for the proposed action. In accordance with the National Environmental Policy Act, the USAF has prepared a Draft EIS and is providing this documentation to the public for review.

In addition to electronic files that can be downloaded at the project website address listed below, printed copies of the Draft EIS will available for review until July 23, 2012 at:

- Guam- University of Guam Robert F. Kennedy Memorial Library; Nieves M. Flores Memorial Library; Andersen Air Force Base Library
- Saipan- Saipan Office of the Mayor; Joeten-Kiyu Public Library
- Tinian- Tinian Office of the Mayor; Tinian Public Library
- Rota- Rota Office of the Mayor; Antonio Camacho Atalig Memorial Library.

The public is encouraged to attend the Draft EIS public hearings, which will be held at the following dates, times, and locations:

1. June 25, 2012 - Saipan Multi-Purpose Center, Beach Road, Susupe Village, Saipan, 5:00 p.m.-8:00 p.m.
2. June 26, 2012 - Tinian Elementary School, San Jose Village, Tinian, 5:00 p.m.-8:00 p.m.

Federal agencies, government of CNMI agencies, the public, and other interested parties are encouraged to provide verbal and/or written comments to the USAF for consideration in the Final EIS. Verbal and/or written comments may be submitted at the public hearings or via postal mail. All comments must be submitted or postmarked no later than July 23, 2012.

#### Mail comments to:

Capt Rebecca Heyse, PACAF/PA  
25 E Street, Suite G-108  
Joint Base Pearl Harbor-Hickam, HI 96853  
ATTN: PACAF Divert Marianas EIS

In addition, comments on the Draft EIS will be accepted via telephone voice recording system by dialing 1-855-200-6734, and via the project website at:

[www.PACAFDivertMarianasEIS.com](http://www.PACAFDivertMarianasEIS.com).



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## **COMMENTS RECEIVED ON THE DRAFT EIS**

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

July 26, 2012

Captain Rebecca Heyse  
PACAF/PA  
25 E Street, Suite G-108  
Joint Base Pearl Harbor-Hickam, HI 96853

Subject: Draft Environmental Impact Statement (DEIS), Divert Activities and Exercises, Guam and the Commonwealth of the Northern Mariana Islands (CNMI) (CEQ # 20120177)

Dear Captain Heyse:

The U.S. Environmental Protection Agency (EPA) has reviewed the subject document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. Our detailed comments are enclosed.

According to the DEIS, the Air Force proposes to improve an existing airport to support a combination of cargo, fighter, and tanker aircraft and support personnel for use in divert landings, periodic military training exercises, and humanitarian assistance. Alternative 1 evaluates the use of Saipan International Airport and Alternative 2 evaluates the use of Tinian International Airport. Alternative 1 is identified as the Preferred Alternative.

Based on our review, we have rated the DEIS's Preferred Alternative as Environmental Objections – Insufficient Information (EO-2) (see enclosed "Summary of Rating Definitions"). The noise impacts predicted to occur to residents on Saipan for 8 weeks per year are severe<sup>1</sup>, with some residents exposed to levels that could put them at risk for potential hearing loss. Despite these findings, the noise impact assessment is minimal, and does not provide supplemental noise analysis (metrics other than the minimum Day-Night Average Sound Level or DNL), nor does it evaluate potential for hearing loss for populations exposed to DNL 80 decibels and above. This appears inconsistent with an applicable DoD internal directive that requires hearing loss risk be estimated for these populations.

The DEIS predicts that 11,095 residents would be periodically exposed to noise levels between DNL 65 and 80 dBA (A-weighted decibels). Land use compatibility guidelines published by the Federal Interagency Committee on Urban Noise (FICUN), an interagency committee – of which Department of Defense was a member – formed to develop Federal policy and guidance on noise, concluded that residential land use is incompatible with noise levels above DNL 65 dB unless measures are taken to achieve additional Noise Level Reduction (NLR). DoD's own policy<sup>2</sup> regarding DoD air installations echoes these guidelines when it states that residential use is discouraged in areas exposed to DNL 65-69 dB and strongly discouraged in areas exposed to DNL 70-74 dB. The fact that the noise impacts would

<sup>1</sup> According to Table 1 of the *Guidelines for Considering Noise in Land Use Planning and Control*, Federal Interagency Committee on Urban Noise, 1980, the noise exposure class for noise levels above DNL 75 dB are classified as "severe exposure".

<sup>2</sup> <http://www.dtic.mil/whs/directives/corres/pdf/416557p.pdf>

only occur for 8 weeks per year does not eliminate this land use incompatibility. The Preferred Alternative predicts that a sizable portion of Dandan would receive noise levels at DNL 75 dB or above. The DEIS also acknowledges that this noise will disproportionately affect minority and low-income populations, yet there is no evidence that outreach to these communities has occurred. We are also concerned that three schools will receive impacts greater than DNL 70 dB. The DEIS does not discuss noise mitigation, and suggests that it is not clear that noise mitigation is necessary. EPA does not believe that such a conclusion is supported by the DEIS, and recommends that the Air Force reconsider this matter and evaluate possible changes to the preferred alternative or a new alternative that could reduce the noise impacts.

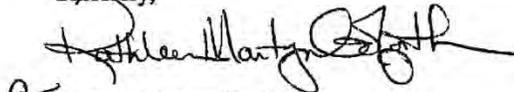
A16  
A17  
A22

The DEIS implies that a design capability less than that proposed, i.e., operation of the same number of aircraft at a reduced load capacity, would meet the purpose and need for the proposed project. EPA recommends, in addition to an improved noise analysis, that alternatives be explored that would improve the airport to a comparable design capability by reducing the number of planes rather than the load capacity of each plane. We also request an evaluation as to whether an alternative that would operate under only the "low scenario" (no fighter jets) would meet the purpose and need. In all cases, noise mitigation measures should be incorporated into the Proposed Action.

A27

EPA appreciates the opportunity to review this DEIS and would like to work with the Air Force to explore ways to meet the the purpose and need for the action while adequately protecting the health and well-being of the residents of Saipan. We will contact you to discuss plans for completing the NEPA process. In the meantime, if you have any questions, please call me at (415) 972-3843 or have your staff contact Karen Vitulano, the lead reviewer for this project, at 415-947-4178 or [vitulano.karen@epa.gov](mailto:vitulano.karen@epa.gov).

Sincerely,



for Enrique Manzanilla, Director  
Communities and Ecosystems Division

Enclosure: Summary of EPA Rating Definitions  
EPA's Detailed Comments

cc: Gordon Wong, Federal Aviation Administration  
Edward M. Deleon Guerrero, Commonwealth Ports Authority  
Frank M. Rabauliman, CNMI Division of Environmental Quality  
Alan Fletcher, Commonwealth Utilities Corporation

## SUMMARY OF EPA RATING DEFINITIONS\*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

### ENVIRONMENTAL IMPACT OF THE ACTION

#### *"LO" (Lack of Objections)*

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### *"EC" (Environmental Concerns)*

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

#### *"EO" (Environmental Objections)*

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### *"EU" (Environmentally Unsatisfactory)*

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

A4

### ADEQUACY OF THE IMPACT STATEMENT

#### *Category "1" (Adequate)*

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### *Category "2" (Insufficient Information)*

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### *Category "3" (Inadequate)*

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR DIVERT ACTIVITIES AND EXERCISES, GUAM AND THE COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS (CNMI), JULY 26, 2012

**Project Description/Alternatives Analysis**

The project description and rationale for the alternatives are not clear. The DEIS states that the KC-135 Stratotanker aircraft is being used as the design aircraft for cargo and tanker aircraft in the EIS and that the KC-135 dimensions will be used to develop space requirements for airport facilities and infrastructure under the Proposed Action (p. 2-2). The Proposed Action, whether taking place at Saipan International Airport (GSN)(Alternative 1) or Tinian International Airport (Alternative 2), was devised to accommodate 12 KC-135 aircraft “to meet the purpose and need of the Proposed Action”; however the DEIS does not state why 12 aircraft were chosen or how this number was determined. This number is important because it is used to scale the number of fighter jets that would be used during training (a size ratio of 1 to 2 was assumed for cargo planes to fighter jets, therefore the Proposed Action includes the use of 24 fighter jets) and it is these that are the source of significant noise impacts.

A24

For the analysis of the implementation phase, the DEIS assumes that any mix of joint fighter, cargo, and tanker aircraft, not to exceed the design capabilities of the airport, could be diverted to or exercised from the airport selected. Representative scenarios of possible aircraft mixes are used to analyze potential environmental consequences. The “low scenario” consists of 12 KC-135’s, the “medium scenario” of 6 KC-135’s and 12 fighter jets, and the “high scenario” consists of 24 fighter jets.

The DEIS also includes 3 runway options for the 2 alternative airport sites: Runway Option A - a runway extension to 10,000 ft (the optimum runway length for the KC-135); Runway Option B - a runway extension less than 10,000 ft; and Runway Option C - no runway extension. The DEIS states that a shorter runway (i.e., no extension) can accommodate KC-135’s and “the location could still support divert, exercise, and humanitarian relief activities” but each KC-135 would need to operate at a reduced load capacity (p. 2-2). Thus, according to the DEIS, operating at a reduced load capacity would meet the purpose and need for the project.

A25

*Recommendation:* The FEIS should explain why 12 KC-135s are needed to meet the purpose and need of the Proposed Action and how this was determined. Discuss the nature of the different scenarios for the reader. For example, explain situations that would require both military training and humanitarian assistance simultaneously at a divert airport (medium scenario).

A24

Since the DEIS indicates that 12 KC-135’s operating at a reduced capacity on a shorter runway would meet the purpose and need for the proposed project, it is reasonable to consider whether some lesser number of KC-135s operating at full capacity on a longer runway would also meet the purpose and need. If it would, an alternative with a design capability for fewer KC-135’s (and, consequently, fewer fighter jets) should be evaluated in the FEIS. If it would not, the FEIS should explain why.

A25

Additionally, we recommend that the Air Force assess whether an alternative that would not utilize the medium and/or high scenario at Saipan International Airport would meet the purpose and need.

## Noise Impacts

### Noise analysis

We have significant concerns regarding the noise impacts to residents in Saipan under Preferred Alternative 1, especially under the medium and high scenarios evaluated. The noise analysis under the high scenario indicates that, for an average busy day during the military exercises 8 weeks per year, 11,095 residents would be periodically exposed to noise levels within the 65 to 80 dBA (A-weighted decibels) DNL (Day-Night Average Sound Level) noise contours (p. 4- 12). The DEIS states that, according to the U.S. Air Force, Federal Aviation Administration (FAA), and Housing and Urban Development (HUD) criteria, noise-sensitive land uses at or above the 65 dBA DNL contour are considered to be within “areas of high noise exposure” (p. 4-4). EPA believes that it is also important to disclose that, according to Federal Interagency Committee on Urban Noise (FICUN)<sup>3</sup> Guidelines for Considering Noise in Land Use Planning and Control (1980), which were developed by the same agencies as above, noise exposures greater than DNL 65 dB are generally not considered compatible with residential land use<sup>4</sup>. The FICUN Guidelines treat areas above DNL 65 dB as marginally compatible to incompatible with residential land use, depending on the degree of noise level reduction (NLR) provided in affected structures. The FICUN land use compatibility guidelines for noise exposure between DNL 65-70 dB call for building codes to require at least 25 dB outdoor to indoor NLR; and, for exposures between DNL 70-75 dB, at least 30 dB NLR is recommended. FICUN considered noise exposure above DNL 75 dB to be "incompatible" with all residential uses except transient lodging with NLR of at least 35 dB. The DEIS does not discuss the housing structures present on Saipan in relation to noise attenuation potential and whether the current buildings are capable of achieving NLR levels specified above for the indicated noise exposures.

A18

Based on Figure 4.1-4, it appears that, of the over 11,000 residents that would be impacted by 65+ dBA DNL, a large percentage would fall above the 70 dBA DNL noise contour, and some above the 75 and 80 dBA DNL. This is a wide range, and the analysis does not provide a breakdown of population exposed for each noise contour.

Despite the high noise levels predicted, no supplemental noise analysis was performed. Supplemental metrics are useful in characterizing specific events and conveying a clearer understanding of the effects impacted communities can expect on their living and working environments as a result of the Proposed Action. For example, single event analysis is useful in evaluating sleep disturbances. Since, for this project, it is assumed that 30% of the flights will occur at night (p. 4-3, 6, 9), this would be an appropriate noise metric to use. No single event noise levels were identified for the Preferred Alternative 1<sup>5</sup>. Similarly, metrics expressing noise impacts in terms of speech interference are also useful for public disclosure. The analysis in the Marine Corps’ West Coast Basing of the F- 35B EIS<sup>6</sup> presented data for both indoor speech interference and indoor sleep disturbance for representative

<sup>3</sup> FICUN formed to develop Federal policy and guidance on noise. The committee’s membership included the Environmental Protection Agency (EPA), the FAA, the Federal Highway Administration, and the Departments of Defense (DOD), Housing and Urban Development (HUD), and Veterans Affairs (VA).

<sup>4</sup> The FICUN Guidelines note that HUD, DOT and EPA recognize DNL 55 dB as a goal for outdoor noise levels in residential areas for the protection of public health and welfare with an adequate margin of safety.

<sup>5</sup> For Alt 2 on Tinian, the DEIS discloses that the maximum single-event level is estimated to reach 95 dBA SEL at the closest community of Marpo Heights (p. 4-24), which would experience close to the 65 dB DNL noise contour, but no single-event measures for the closest community on Saipan, lying in the DNL 80 dB contour are disclosed.

<sup>6</sup> See [http://www.usmcsjfwest.com/Resources/Documents/Final\\_Volume\\_1.pdf](http://www.usmcsjfwest.com/Resources/Documents/Final_Volume_1.pdf)

residences with windows open and windows closed. The F-35B EIS also identified the number of housing units affected in each noise contour above DNL 65 dB, which is useful for disclosing impacts and expressing the mitigation burden for the soundproofing of dwellings.

↑  
A18

The DEIS predicts noise exposures at and above DNL 75 dB, with some above DNL 80 dB, yet there was no analysis to assess the potential for hearing loss. We believe that when noise-sensitive receptors are identified in the 75 dB+ noise contour, risk of hearing loss should be evaluated. DoD policy in "Methodology for Assessing Hearing Loss Risk and Impacts in DoD Environmental Impact Analysis" applies whenever the 80 dB DNL contour extends into populated areas off base and requires that hearing risk loss be estimated for this population.

A19

*Recommendations:* The noise analysis in the FEIS should be improved. We recommend that the following be included:

Provide a breakdown of the population that would be exposed in each noise contour. Quantify the number of residents that would be "highly annoyed" as defined in Table 4.1-1 (Feingold data);

Conduct supplemental noise analysis to disclose indoor speech interference and indoor sleep disturbance<sup>7</sup> for the 8 week training period, such as was performed in the Marine Corps' West Coast Basing of the F-35B EIS. Discuss sleep disturbance results with reference to the World Health Organization's guidance that equivalent sound pressure level should not exceed 30 dBA indoors for continuous noise, and 45 dB SEL for single events if negative effects on sleep are to be avoided<sup>8</sup>;

A18

Estimate potential for hearing loss for noise exposures at DNL 75 dB and above. Provide single event analysis (e.g. SEL metrics) for Alternative 1, as is provided for Alternative 2, and include this information in the hearing loss analysis. Discuss results in terms of the World Health Organization's 120 dB guideline threshold for hearing impairment in children<sup>9</sup>. It may be helpful to discuss the frequency of expected noise from the project in terms of hearing loss. Noise-induced hearing impairment occurs predominantly in the higher frequency range of 3,000–6,000 Hz, with the largest effect at 4,000 Hz<sup>10</sup>.

A19

Quantify the number of dwellings that would fall under each noise contour. Disclose that noise levels above 65 dB are normally considered incompatible with residential land use;

Discuss the construction materials and methods of housing structures on Saipan in relation to noise attenuation potential and indicate the probable noise level reduction these structures would be capable of achieving.

<sup>7</sup> The Federal Interagency Committee on Aviation Noise (FICAN) recommends the use of ANSI Standard ANSI S12.9-2008 to Predict Awakenings from Aircraft Noise. See S12.9-2008, *Quantities and Procedures for Description and Measurement of Environmental Sound — Part 6: Methods for Estimation of Awakenings Associated with Outdoor Noise Events Heard in Homes*, 2008

<sup>8</sup> World Health Organization. 1999. *Guidelines for Community Noise*. Available: <http://www.who.int/docstore/peh/noise/guidelines2.html>

<sup>9</sup> *ibid*

<sup>10</sup> *ibid*

**Health Impacts from Noise**

The DEIS does not discuss the potential health effects from noise. There is increasing evidence that noise impacts have non-auditory health effects. A 2007 review article<sup>11</sup> that summarizes studies from the National Library of Medicine database on the adverse health effects of noise concludes that “the potential health effects of noise pollution are numerous, pervasive, persistent, and medically and socially significant. Noise produces direct and cumulative adverse effects that impair health and that degrade residential, social, working, and learning environments with corresponding real (economic) and intangible (well-being) losses”. Long-term physical health effects have been linked to noise effects related to sleep disturbances, stress, cardiovascular response, and increased blood pressure. The mental health effects that noise is suspected to cause or contribute to include anxiety, emotional instability, mood changes, increase in social conflicts, neurosis, and psychosis.

A8

*Recommendation:* Disclose the physical and mental health impacts that have been linked to the project noise levels identified in the FEIS.

**Impacts to Children and Schools**

Pursuant to Executive Order 13045 - Protection of Children from Environmental Health Risks and Safety Risks, the DEIS concludes that the Proposed Action would not result in disproportionate risks to children from environmental health risks or safety risks; however, because there is no discussion of noise impacts on children’s health and learning, this conclusion is not supported.

The DEIS identifies 3 schools that fall into the 70 dB noise contour under the medium and high scenarios for Preferred Alternative 1 (p. 4-7, 4-12). Under baseline conditions, none of these land uses are within the 65 dBA DNL noise contour (p. 3-4). Dandan Elementary School noise would increase from 46 dBA to over 70 dBA, Koblerville Elementary School from 50 dBA to over 70 dBA, and Saipan Southern High School from 49 dBA to over 70 dBA. These are substantial noise increases - decibels are on a logarithmic scale, and an increase of 10 dBs represents a subjective doubling of loudness<sup>12</sup>. Elevated noise levels at schools are of concern because research on the effects of aircraft noise on student learning indicates interference with reading, motivation, language and speech, and memory<sup>13</sup>. These represent acoustical barriers to learning, especially for young children since they are more susceptible than adults to the effects of background noise on spoken communication<sup>14</sup>.

A9

Goines and Hagler (2007), in their review article cited above, concluded that children are particularly vulnerable to the effects from noise interference with spoken communication. The inability to comprehend normal speech may lead to a number of personal disabilities, handicaps, and behavioral changes. Children who live in noisy environments have been found to have heightened sympathetic arousal indicated by increased levels of stress-related hormones and elevated resting blood pressure. Noise is assumed to accelerate and intensify the development of latent mental disorders and children may be particularly vulnerable to these effects because they may lack adequate coping mechanisms. The review article concludes that because children are particularly vulnerable to noise induced

<sup>11</sup> Goines, Lisa RN and Hagler, Louis MD. 2007. "Noise Pollution: A Modern Plague", *Southern Medical Journal*: Volume 100 - Issue 3 - pp 287-294.

<sup>12</sup> Federal Interagency Committee on Noise (FICON), August 1992. *Federal Agency Review of Selected Airport Noise Analysis Issues*. Available: <http://www.fican.org/pdf/nai-8-92.pdf>

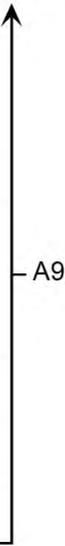
<sup>13</sup> [http://www.fican.org/pdf/Effects\\_aircraft.pdf](http://www.fican.org/pdf/Effects_aircraft.pdf)

<sup>14</sup> ANSI S12.60-2002 American National Standard, *Acoustical Performance Criteria, Design Requirements, and Guidelines for Schools*

abnormalities, they need special protection, and the evidence is strong enough to warrant monitoring programs in schools and elsewhere to protect children from noise exposure.

The DEIS does not identify these impacts to children's health and learning, nor are any mitigation measures identified, as required by 40 CFR 1502.16(h).

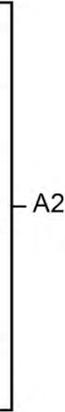
*Recommendations:* Disclose impacts to children including potential health impacts and impacts to learning. Identify possible mitigation measures, including retrofitting impacted schools with appropriate measures to achieve the classroom acoustics standard of the American National Standards Institute (ANSI)<sup>15</sup>. This could include adding insulation, adding a second window pane or replacing windows with better sound attenuation, sealing gaps or leaks in windows and doors, installing baffles in vents and improving the exterior roofing, consistent with radon safety. Indicate whether noise insulation at these schools could achieve the ANSI acoustical performance criteria with the noise levels predicted from the Proposed Action, specifically the requirement that the one-hour average background noise level not exceed 35 dBA in core learning spaces smaller than 20,000 cubic feet and 40 dBA in larger spaces. Identify possible funding sources for this mitigation and the likelihood that mitigation would occur. See comment below on noise mitigation.



**Noise mitigation**

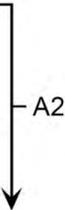
As mentioned, no mitigation measures for noise are identified despite the very high increases in noise that would occur during 2 months of the year. We understand that there is no existing Department of Defense program that permits appropriated funding for off-base sound attenuation; however, since GSN is a civilian airport, it is eligible to apply for financial assistance from the FAA Part 150 program for noise mitigation. This would require updating the Noise Exposure Maps and the Noise Compatibility Plan, as well as matching funds from the airport. According to the DEIS, the Department of Defense will need to negotiate space for military improvements with the authority running the airport, and any additional costs for construction and ongoing maintenance to the operating authority would be addressed in the mutual use agreement (p. 1-14).

*Recommendations:* Identify mitigation measures for noise impacts in the FEIS per 40 CFR 1502.16(h). We recommend that the Air Force work with the airport authority to ensure that the mutual use agreement includes sufficient financial contributions from DoD for ongoing maintenance so the authority can afford to pursue FAA Part 150 program funding.



**Cumulative Noise Impacts Not Evaluated**

The DEIS acknowledges that noise impacts on noise-sensitive receptors during implementation of the preferred alternative would be significant (p. ES-12); however, it does not acknowledge cumulative noise impacts. Table ES-3 on p. ES-22 does not address cumulative noise impacts from implementation of the preferred alternative<sup>16</sup> nor does the text on page 5-9 address cumulative operational noise impacts. Instead, the DEIS states that no cumulative impacts would be expected on the noise environment due to air operations, because the air training operations were analyzed in the MIRC EIS, for which a Record



<sup>15</sup> ANSI/ASA S12.60-2002 (R2009) American National Standard Acoustical Performance Criteria, Design Requirements, and Guidelines for Schools.

<sup>16</sup> A summary bullet is listed only for the construction phase for Saipan, although a summary bullet is included for both construction and implementation for the Tinian alternative.

of Decision was issued. The MIRC EIS, however, did not include training use of the Saipan International Airport, so the impact assessment for the aircraft operations in the MIRC EIS was for noise receptors on Guam. Noise impact assessments are necessarily localized and must involve the actual receptors that would be impacted under the Proposed Action. Cumulative noise impact assessments evaluate project impacts to these receptors in combination with noise from other past, present and reasonably foreseeable future actions.

↑  
A21

*Recommendation:* Conduct an impact assessment for noise impacts that occur incrementally from the proposed action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions (40 CFR 1508.7).

**Noise Impacts and Environmental Justice**

The DEIS reveals that Saipan has disproportionately high minority populations and disproportionately high low-income populations in some areas, and that noise impacts would represent “a disproportionate impact on disproportionately high minority populations within District 10” (p. 4-114). It also states that “the USAF will conduct outreach to the potentially impacted communities to ensure they are engaged in the NEPA process and are part of the mitigation development process, if it is determined that mitigation is required” (p. 4-114). It is not clear what criteria the Air Force is using to determine when mitigation is required; nor is it clear whether or not the impacted community has yet been engaged. For outreach to be meaningful, especially to environmental justice communities, it should occur early in the NEPA process.

A1

The DEIS concludes that while disproportionate impacts would occur to minority and low-income populations, this impact would not be significant because it would occur intermittently up to 8 weeks per year. (p. 4-114). This is confusing since the DEIS acknowledges significant noise impacts on page ES-12. Additionally, Council on Environmental Quality’s (CEQ) NEPA Regulations state that “significance cannot be avoided by terming an action temporary” (40 CFR 1508.27(b)7). The noise levels predicted in the DEIS are very high and much higher than the significance threshold of DNL 65 dB identified by FICON, in which the Air Force was a member (see footnote #9).

A2

The DEIS identifies “quality of life” in the discussion of sociocultural issues and states that “quality of life relates to the ability of Saipan and Tinian to adequately support the Proposed Action, including how the island’s general tranquility, family and community relations, cultural identity, infrastructure, social services, and standards of living could be affected” (p. 3-109). The DEIS does not discuss the impact of noise on the island’s general tranquility in its discussion of sociocultural impacts. Based on the noise levels predicted, adverse sociocultural issues may not be negligible as stated in the DEIS (p. 4-113).

A3

*Recommendations:*

If outreach to the community on Saipan has not yet occurred, it should occur as soon as possible, with commenting opportunities provided, before the FEIS is published. Information on noise impacts should be provided in a clear way that is meaningful and understandable to the public. Materials should be translated as appropriate. The FEIS should clarify what criteria the Air Force is using to determine when mitigation is required. The FEIS should acknowledge that noise impacts are significant, in general, and, therefore, significant to the environmental justice community.

A1-A3

The FEIS should reassess the sociocultural impacts of the proposed project, including impacts on the island's general tranquility.

**Infrastructure**

**Water Supply**

The description in the DEIS of the water supply quantity and quality conditions on Saipan is largely accurate with regard to water shortages, the lack of a 24-hour water supply for residents, and high chlorides (saltiness) of the existing groundwater supply. The DEIS states, however, that "it is assumed that both capacity and quality of water at GSN are sufficient to support personnel under both the construction phase and the implementation of the Proposed Action" (p. 3-90). It also characterizes impacts as minor and adverse, noting that they would occur on an already strained system (p. 4-100). Even though the water demand from the project is relatively small, if the BEAR site option is used for billeting and water withdrawal is concentrated in one area (in the vicinity of the intersection of Flame Tree Road and Airport Access Road, p. 2-26), the increase in demand for the 8 weeks per year could have significant localized impacts on the water distribution system in that area. In addition, because of the noted water quality problems, water is deemed too salty for drinking and most residents on Saipan purchase bottled water or groundwater treated by reverse osmosis for drinking.

A10

The DEIS states that a 2-inch water supply line would be required for the proposed hangar, maintenance facility, and billeting areas (p. 4-96). A water line of this size may not be consistent with local codes and could be insufficient to provide flows needed for fire-fighting.

A11

The DEIS estimates the daily increased water demand at approximately 68,000 gpm when the facilities are in use. This is roughly equivalent to one or two of the existing Commonwealth Utility Corporation (CUC) groundwater wells.

A12

*Recommendation:* The FEIS should evaluate localized impacts to the water supply system for the 8 weeks during which exercises would occur. The Air Force should consider the existing deteriorated system in determining significance of these impacts. We recommend working with the CUC to determine the intake locations that would minimize localized impacts, and whether any additional facilities (additional source capacity and/or storage) are warranted. The commercial lodging option appears likely to reduce localized impacts to the water supply system since it is less centralized. If the BEAR Site is used for billeting, the FEIS should note the probable need for bottled drinking water or treatment of some water via reverse osmosis.

A10

The FEIS should indicate whether a 2-inch water line is consistent with local codes and with military codes. Coordinate with CUC to ensure sizing is sufficient for all water needs.

A11-A12

**Wastewater Treatment**

The DEIS accurately describes the conditions of the existing wastewater and sewer systems on Saipan, noting that they are not in compliance with their EPA National Pollutant Discharge Elimination System (NPDES) Permit requirements and the Clean Water Act. While capacity at the wastewater treatment plants is not an issue, the flows, although minor, could exacerbate the noncompliant condition. CUC is currently undergoing a Master Planning process which details the necessary upgrades that are needed to bring the plants into compliance.

A13

*Recommendation:* We recommend coordinating with CUC to determine how the Air Force can utilize the wastewater and sewer system in a manner that is consistent with the proposed draft master plan for Saipan and that will not contribute to noncompliance.

↑  
A13

**Biological Resources**

Biosecurity is a concern for the Preferred Alternative 1 as well as Alternative 2 on Tinian. Increased aircraft activities will increase the potential for the introduction of invasive species, including the brown tree snake, which the DEIS indicates has already been detected on Saipan (p. 4-60). The DEIS states that the U.S. Air Force will commit to implementing 100 percent inspection of all outgoing aircraft from Guam for the brown tree snake, and that redundant inspections “will be” conducted on Saipan (p. 4-60, line 37). On page 4-61, the DEIS states that redundant inspection “could be” conducted on Saipan during project development and training activities (line 37). The DEIS does not discuss the potential for other invasive species to be introduced on Saipan or Tinian from the project. According to the U.S. Fish and Wildlife Service (USFWS), other invasive species of concern in the CNMI are the little fire ant, the greenhouse frog, and the coconut rhinoceros beetle.

A14

Preferred Alternative 1 would remove 14.3 acres of forest, primarily for the east parking apron and ramp and the bulk fuel storage (p. 4-59). The maintenance facility will result in removal of just under an acre. Based on Figure 2.3-6, if commercial lodging is utilized for billeting and the BEAR site is not needed, space may be available for the fuel tanks and hydrant system at this location to avoid removal of up to 5 acres of forest. Additionally, based on Figure 2.3-5, it appears there could be non-forested space across the road from the proposed maintenance facility that could be utilized for this structure.

A26

*Recommendation:* Clarify in the FEIS whether the Air Force will commit to redundant inspections on Saipan during project development and training activities, and identify whether there is sufficient capacity and infrastructure to perform these inspections or whether additional capacity is needed. Work with USFWS to obtain their concurrence on the biosecurity program.

A14

Explore and discuss in the FEIS whether forest removal has been minimized by site planning, including the possible adjustments to facility locations mentioned above.

A26

**Additional Comments**

The DEIS states that portions of the Marianas Trench Marine National Monument are not within the Study Area but are to the north and south of the Study Area (p. 1-3, line 32). However, the DEIS also states that “the Mariana Islands Range Complex (MIRC) and the [Divert Activities] Study Area are the same geographical areas” (p. 1-10, line 30). We note that the MIRC FEIS states that “the MIRC and the [MIRC] Study Area are the same geographical areas” (MIRC FEIS, p. ES-1) and that “portions of the Marianas Trench Marine National Monument lie within the [MIRC] Study Area” (MIRC FEIS, p. ES-2). Clarify this discrepancy in the FEIS.

A5

The DEIS mentions “demolition activities” that would occur for Alternative 1 (p. 4-31) but demolition was not identified in the project description, and p. 4-88 states that Alternative 1 does not entail building demolition. Clarify this discrepancy in the FEIS.

A6

Table 1.5-1 states that no permit will be needed under the Clean Water Act, but that a stormwater general permit will be needed for construction activities. Such permits are issued pursuant to the Clean Water Act.

A7



**U.S. DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric  
Administration**

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Pacific Islands Regional Office  
1601 Kapiolani Blvd., Suite 1110  
Honolulu, Hawaii 96814-4700  
(808) 944-2200 • Fax: (808) 973-2941

**JUL 18 2012**

Captain Rebecca Heyse  
Pacific Air Forces  
25 E Street, Suite G-108  
Joint Base Pearl Harbor-Hickam, HI 96853

Dear Captain Heyse:

This letter provides comments from the NOAA National Marine Fisheries Service (NMFS) Pacific Islands Regional Office's Protected Resources Division regarding the Draft Environmental Impact Statement (DEIS) for the Divert Activities and Exercises for Guam and the Commonwealth of the Northern Mariana Islands.

Our agency is responsible for the implementation of the Endangered Species Act (ESA) and the Marine Mammal Protection Act (MMPA) for marine species within the Pacific Islands Region, which includes the U.S. Territories of Guam and the Commonwealth of the Northern Mariana Islands. The DEIS states in Section 3.7, Marine Biological Resources, that both humpback whales and sperm whales have been sighted off of Saipan, and that humpback whales may migrate to waters off of Saipan for breeding purposes. It also notes that sperm whales have been sighted near the island of Tinian (DEIS pg. 3-61). ESA-listed species under NMFS jurisdiction that are known or expected to occur in waters of the Mariana Archipelago include green sea turtles (*Chelonia mydas*), hawksbill sea turtles (*Eretmochelys imbricata*), leatherback sea turtles (*Dermochelys coriacea*), and olive ridley sea turtles (*Lepidochelys olivacea*), as well as blue whales (*Balaenoptera musculus*), fin whales (*Balaenoptera physalus*), humpback whales (*Megaptera novaeangliae*), sei whales (*Balaenoptera borealis*), and sperm whales (*Physeter macrocephalus*). Numerous other marine mammals also occur within the archipelago and are protected under the MMPA (see attached list).

B27

The DEIS states that fuel would be shipped to the harbors to support the proposed increase in military air traffic; however, it does not include an analysis of the impacts of increased vessel traffic (to supply fuel or any other supplies) on protected marine species or their habitats. Instead, the effects section of the DEIS focuses on construction and operations at the airfields. The EIS should consider the potential impacts of increased shipping to the selected island to supply the construction and to provide the extra fuel and military supplies that would be required in support of the proposed action, as well as any other expected marine activities.

B28

The DEIS states Tinian Harbor supports limited shipping of shallow draft vessels and has a limited capability to accept fuel shipments (Section 2.2.2.3 pg. 2-10). Based on this statement it appears that harbor improvements would be required to accommodate the expected shipping of shallow draft vessels. As such, the Tinian alternative should include an assessment of any required harbor work.



Additionally, the cumulative effects analysis (DEIS Chapter 5) lacks sufficient consideration of the impacts to the marine environment, such as increased shipping traffic within the action areas (Sections 5.3.7.1 and 5.3.7.2).

We recognize that your agency has made a preliminary determination in the DEIS that the proposed action may affect, but is not likely to adversely affect, protected marine species (DEIS pg. 4-68 lines 9 and 21; pg. 4-69 lines 5 and 16). However, the DEIS is currently insufficient to justify that determination, and we're recommending that consideration be made to the additional points described above to insure a full assessment on the potential impacts of the project regarding sea turtles and marine mammals. If you require technical assistance regarding your effects determination, or have questions regarding what is necessary to fulfill your ESA section 7 obligations, please contact Donald Hubner at (808) 944-2233 or at donald.hubner@noaa.gov.

B30

If you should have any questions regarding these comments, please contact Jayne LeFors on my staff at (858) 546-5653 or at the e-mail address jayne.lefors@noaa.gov.

Sincerely,



Alecia VanAtta  
Assistant Regional Administrator  
for Protected Resources

**MARINE PROTECTED SPECIES of the MARIANA ISLANDS**

National Marine Fisheries Service, Pacific Islands Regional Office

**MARINE MAMMALS**

All marine mammals are protected under the Marine Mammal Protection Act. Those identified under the ESA Listing are also protected under the Endangered Species Act.

<u>Common Name</u>	<u>Scientific Name</u>	<u>ESA Listing</u>
Blue Whale	<i>Balaenoptera musculus</i>	Endangered
Blainville's Beaked Whale	<i>Mesoplodon densirostris</i>	
Bryde's Whale	<i>Balaenoptera edeni</i>	
Cuvier's Beaked Whale	<i>Ziphius cavirostris</i>	
Dwarf Sperm Whale	<i>Kogia simus</i>	
False Killer Whale	<i>Pseudorca crassidens</i>	
Fin Whale	<i>Balaenoptera physalus</i>	Endangered
Humpback Whale	<i>Megaptera novaeangliae</i>	Endangered
Killer Whale	<i>Orcinus orca</i>	
Long-Finned Pilot Whale	<i>Globicephala melaena</i>	
Longman's Beaked Whale	<i>Indopacetus pacificus</i>	
Melon-Headed Whale	<i>Peponocephala electra</i>	
Minke Whale	<i>Balaenoptera acutorostrata</i>	
Pygmy Killer Whale	<i>Feresa attenuata</i>	
Pygmy Sperm Whale	<i>Kogia breviceps</i>	
Sei Whale	<i>Balaenoptera borealis</i>	Endangered
Short-Finned Pilot Whale	<i>Globicephala macrorhynchus</i>	
Sperm Whale	<i>Physeter macrocephalus</i>	Endangered
Bottlenose Dolphin	<i>Tursiops truncatus</i>	
Common Dolphin	<i>Delphinus delphis</i>	
Fraser's Dolphin	<i>Lagenodelphis hosei</i>	
Pantropical Spotted Dolphin	<i>Stenella attenuata</i>	
Risso's Dolphin	<i>Grampus griseus</i>	
Rough-toothed Dolphin	<i>Steno bredanensis</i>	
Spinner Dolphin	<i>Stenella longirostris</i>	
Striped Dolphin	<i>Stenella coeruleoalba</i>	
Dugong*	<i>Dugong dugon</i>	Endangered
Northern Elephant Seal	<i>Mirounga angustirostris</i>	

**SEA TURTLES**

All sea turtles are protected under the Endangered Species Act.

<u>Common Name</u>	<u>Scientific Name</u>	<u>ESA Listing</u>
Green Turtle	<i>Chelonia mydas</i>	Threatened
Hawksbill Turtle	<i>Eretmochelys imbricata</i>	Endangered
Leatherback Turtle	<i>Dermochelys coriacea</i>	Endangered
Olive Ridley Turtle	<i>Lepidochelys olivacea</i>	Threatened

\* Dugongs are under the jurisdiction of the US Fish and Wildlife Service.



**U.S. DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
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July 17, 2012

Capt Rebecca Hayes  
PACAF/PA  
25 E Street, Suite G-108  
Joint Base Pearl Harbor-Hickam, HI 96853  
Attn: PACAF Divert Marianas EIS

Dear Capt Hayes,

The National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NMFS) Pacific Islands Regional Office, Habitat Conservation Division (PIRO HCD) has reviewed the "Draft Environmental Impact Statement for Divert Activities and Exercises, Guam and the Commonwealth of the Northern Mariana Islands" prepared for United States Air Force, Headquarters, Pacific Air Forces (USAF) in June 2012. We offer the following comments in accordance with the Essential Fish Habitat (EFH) provision of the Magnuson-Stevens Fishery Conservation and Management Act (MSA 50 C.F.R. § 600.905 – 930), also the National Environmental Policy Act (NEPA 42 U.S.C. 4321 et seq.), the Fish and Wildlife Coordination Act (FWCA 16 U.S.C. § 662(a)), the Coral Reef Executive Order 13089, and the Clean Water Act (CWA 33 U.S.C. §1251 et seq.)

The USAF proposes to construct facilities and infrastructure at an existing airport or airports in the Mariana Islands to support a combination of aircraft and associated support personnel for divert landings, periodic exercises, and humanitarian assistance and disaster relief. The Proposed Action will establish additional divert capabilities to support and conduct current, emerging, and future training activities, while ensuring the capability to meet mission requirements in the event that access to Andersen Air Force Base (AFB) or other western Pacific locations is limited or denied.

The draft Environmental Impact Statement (DEIS) describes three potential alternatives:

- *Alternative 1 - GSN:* the creation of divert capabilities at the Francisco C. Ada Saipan International Airport (GSN) (preferred)
- *Alternative 2 - TNI:* the creation of divert capabilities at the Tinian International Airport (TNI)
- *Alternative 3:* No Action

The DEIS evaluates impacts from both the Construction Phase and the Implementation Phase. The Construction Phase includes the potential extension of airport runways and creation of a parking apron, temporary munitions storage area, hazardous cargo pad and arm/disarm pad, aircraft hangar,



maintenance facility, jet fuel infrastructure, and billeting facilities for up to 500 personnel. The Implementation Phase includes activities related to divert landings, humanitarian airlift staging, military exercises, jet fuel receiving, storage, and distribution, and billeting.

According to the DEIS, the GSN Alternative will increase impervious surfaces by up to 2,392,200 square feet and the TNI Alternative will increase impervious surfaces by up to 4,090,800 square feet. Both alternatives are located within the coastal zone, in close proximity to nearshore marine resources, including Essential Fish Habitat (EFH). Previous large scale clearing and grading projects in the Mariana Islands have resulted in significant impacts to surface and nearshore water quality, EFH, and coral reefs. The DEIS states that: "With proper sediment and erosion controls and storm water management BMPs in place, it is assumed that storm water runoff during construction activities would result in short-term, indirect, minor, adverse impacts on water quality in down gradient surface water bodies and nearshore waters." (p. 4-54 lines 13-16) However, the DEIS provides limited analysis on BMP implementation, maintenance and effectiveness and does not evaluate the potential impacts of these activities on EFH in the affected nearshore waters.

B31

The Magnuson-Stevens Fishery Conservation and Management Act (MSA), (16 USC § 1855(b)(2)) requires federal agencies to consult with NMFS on "any action authorized, funded, or undertaken, or proposed to be authorized, funded or undertaken, by such agency that may adversely affect any essential fish habitat identified under the Act." Further, NMFS is required to provide conservation recommendations for actions that would adversely affect EFH. 50 CFR 600.905 outlines the general EFH consultation procedure. We recommend that the USAF evaluate potential impacts to EFH associated with this proposed action to determine whether consultation under MSA is necessary for this project.

Impacts to water quality may also affect corals petitioned for listing under the Endangered Species Act (ESA). Forty of the eighty-two candidate species are found in the Mariana Islands (see attached list). A number of these species have been observed in close proximity to the airports and harbors in both Saipan and Tinian. A decision on listing is expected in late 2012. Listing of the corals under the ESA might necessitate a Section 7 consultation for corals. More information on this process is available at: [http://www.fpir.noaa.gov/PRD/prd\\_coral.html](http://www.fpir.noaa.gov/PRD/prd_coral.html)

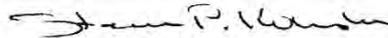
B32

During the scoping meetings, it was noted that significant harbor improvements may be required to support the development, enhancement, and operations of a divert airfield location. Should the USAF require upgrades at either Saipan Harbor or Tinian Harbor to accommodate the delivery and handling of jet fuel or other supplies, the USAF may need to initiate consultation with NMFS under the Fish and Wildlife Coordination Act and MSA.

B33

Thank you for the opportunity to provide input during the scoping process for this proposed action. Should you have any questions, please contact Valerie Brown in our Guam Field Office [valerie.brown@noaa.gov](mailto:valerie.brown@noaa.gov) or 671-646-1904.

Sincerely,



for  
Gerald W. Davis  
Assistant Regional Administrator  
Habitat Conservation Division

**CC via e-mail:**

**U.S. Fish and Wildlife Service  
US EPA Region 9  
CNMI Coastal Resources Management Office  
CNMI Department of Environmental Quality  
CNMI Division of Fish and Wildlife**



United States Department of the Interior



NATIONAL PARK SERVICE  
Pacific West Region  
333 Bush Street, Suite 500  
San Francisco, California 94104-2828

IN REPLY REFER TO  
L7619 (PWR-PP)  
ER 12\0420

31 JUL 2012

Capt. Rebecca Heyse, PACAF/PA  
ATTN: PACAF Divert Marianas EIS  
25 E Street, Suite G-108  
Joint Base Pearl Harbor-Hickam, Hawaii 96853-4512

Dear Captain Heyse,

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for Divert Activities (ER 12\0420). The National Park Service (NPS) has some general comments on the proposed project as well as specific comments regarding information in the DEIS.

**Natural Resources**

The NPS is concerned that increased flights from Guam and other areas can introduce invasive species to Saipan (or Tinian), especially the brown tree snake. Additional inspection resources, quarantine areas, personnel, training, and detection dogs will all be needed. The ability to have 100% inspection and control over all Divert traffic landing on Saipan will be necessary and the EIS should address how the Divert procedures will conform to regional Biosecurity Plans and requirements.

C31

**Cultural Resources**

The NPS represents the Secretary of the Interior in matters relating to National Historic Landmarks (NHLs). This authority is granted by the National Historic Preservation Act (NHPA) and authorizes the NPS to act on behalf of an NHL that a federal undertaking may adversely affect :

*Prior to the approval of any Federal undertaking which may directly and adversely affect any National Historic Landmark, the head of the responsible Federal agency shall, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to such landmark, and shall afford the Advisory Council on Historic Preservation a reasonable opportunity to comment on the undertaking.<sup>1</sup>*

<sup>1</sup> NHPA Section 110(f) and 36 CFR 800 Section 800.10. [16 U.S.C. 470h-2(f) — Federal undertakings affecting National Historic Landmarks]



Section 106 of the NHPA, as set forth in 36 CFR Sections 800.6 and 800.10, requires that an agency identify the presence of NHLs and other historic properties within the undertaking's area of potential effect and assess whether implementation of undertaking will have an adverse effect on such properties. If it is determined that an undertaking may affect an NHL, the Agency is required to notify the Secretary of the Department of the Interior of any consultation involving an NHL, and formally invite the Secretary to participate in Section 106 consultation when there may be an adverse effect to an NHL.

We have noted the potential for adverse effects to the Landing Beaches, Aslito/Isley Field, and Marpi Point National Historic Landmark District (NHL) on Saipan, specifically the Aslito/Isley Field Historic District section of the NHL. On June 17, 2012, NPS staff visited the proposed area for the Saipan alternative with HDR Environmental, Operations and Construction, Inc. (HDR) archeological staff. This field visit was prompted by a draft Phase I Cultural Resources Survey Report (April 2012) prepared by HDR for the Saipan alternative for the proposed project. This field visit was very informative and we enjoyed the opportunity to discuss the details of the cultural field work.

During the field visit, we discussed the locations within the project area that were investigated for cultural resources during the survey and what resources were identified. We visited a Japanese bunker that had not been previously identified. HDR had sent a letter to the Historic Preservation Officer (HPO) of the Commonwealth of the Northern Mariana Islands (CNMI) and NPS asking for "concurrence" on the determinations of eligibility to the National Register of Historic Places (NRHP) that was included in the Phase I report. This included the recommendation that some features within the NHL are ineligible for the NRHP. There was some confusion as to what HDR was asking for in regards to concurrence. We explained that the only way an NHL designation can be modified is through the NHL amendment process which includes a review and acceptance by the National Historic Landmarks Committee of the National Park System Advisory Board. Please refer to our detailed comments in the letter dated June 25, 2012 from Dr. David Louter to Mr. William Grannis (see Attachment).

C32

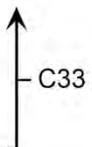
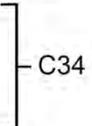
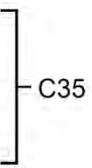
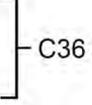
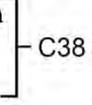
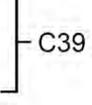
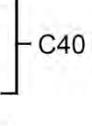
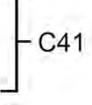
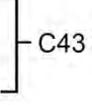
On June 22, 2012, a team of HDR and Air Force representatives provided the NPS with a presentation about the DEIS. From that discussion, we understand the analyses required under the National Environmental Protection Act (NEPA) and NHPA are being combined. We would like to reiterate the need to invite all interested parties to participate in meetings that are clearly advertised as Section 106 consultation.

In general, the Section 106 process should be followed to determine the effects, if any, to historic properties within the project area. To date, it appears that a letter initiating Section 106 was sent to the CNMI HPO, the NPS and the Advisory Council on Historic Preservation (ACHP) (February 2012). Additionally, a draft Phase I cultural resources survey was prepared for the Aslito/Isley Field area. This report identified cultural resources within proposed areas of ground disturbance within the project area for Alternative 1 in the DEIS.

In addition, the National Park Service offers the following comments specific to the DEIS:

Chapter 3, Affected Environment, page 3-62, lines 10-11 – The description of the study area for cultural resources needs to be better defined. The Area of Potential Effect (APE) as defined in

C33

<p>36 CFR 800.16(d) “geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist” should be included. The NPS suggests the inclusion of a map showing the APE for the proposed project.</p>	 <p>C33</p>
<p>Page 3-68, line 14 (and line 17) –These sentences reference an “APE”. The APE has not been previously defined in the DEIS. The Area of Potential Effect for each alternative should be defined in the Affected Environment section of the DEIS; and if there is variance between the alternatives, then individual APE maps should be included.</p>	 <p>C34</p>
<p>Chapter 4, Environmental Consequences, page 4-69, 4.8 Cultural Resources, paragraph 2 This paragraph does not adequately define the Section 106 process requirements as outlined in 36 CFR 800. For example, it states that consultation will only be done if adverse effects to cultural resources are determined. Through the Section 106 process, effects to resources are determined through the consultation process.</p>	 <p>C35</p>
<p>4.8.1 Alternative 1 – GSN – There is no mention of the Phase I Cultural Resources Survey (2012) that was prepared by HDR for the Aslito/Isley Field alternative. Suggest referencing the findings from the report.</p>	 <p>C36</p>
<p>4.8.1 Alternative 1 – GSN – The area of the proposed associated fuel tanks located at the Port of Saipan is not addressed and should be.</p>	 <p>C37</p>
<p>4.8.1 Alternative 1 – GSN – If possible, the Section 106 finding of effect should be included with the NEPA impact determination. For example, a long-term major impact would be significant under NEPA as well as an adverse effect under Section 106.</p>	 <p>C38</p>
<p>4.8.1 Alternative 1 – GSN, line 32 – While the adverse impacts could impact the historic fabric, a better way to state this would be that there could be adverse impacts to the National Historic Landmark historic properties.</p>	 <p>C39</p>
<p>4.8.1 Alternative 1 – GSN, Line 33 – Section 106 consultation as outlined in 36 CFR 800.2 needs to be done with all interested parties – not just the HPO and NPS. Additionally, because the proposed project area is within a National Historic Landmark the ACHP needs to be consulted.</p>	 <p>C40</p>
<p>4.8.1 Alternative 1 – GSN, Line 34 – Likewise, the determination of impacts to resources and identification of appropriate mitigations should also be done in consultation with all interested parties.</p>	 <p>C41</p>
<p>4.8.1.1. Construction Phase, paragraph 1 – Replace the term historic fabric with historic property(ies) where appropriate.</p>	 <p>C42</p>
<p>4.8.2 Alternative 2 – TNI, line 37 – Section 106 consultation needs to be conducted with all interested parties to identify the APE, resources within the APE and potential impacts to those resources from project implementation. Likewise, the determination of impacts to resources and</p>	 <p>C43</p>

identification of appropriate mitigations should also be done in consultation with all interested parties.

4.8.2 Alternative 2 TNI -- If possible, the Section 106 finding of effect should be included with the NEPA impact determination. For example, a long-term major impact would be significant under NEPA as well as an adverse effect under Section 106. ] C44

Chapter 5, Cumulative and Other Effects, 5.3.8 Cultural Resources In general, the impact assessment to cultural resources from cumulative impacts is lacking a discussion on past, present and reasonably foreseeable future actions when added to the proposed action. The discussion in the DEIS seems to further address impacts to cultural resources from the proposed action only. ] C45

5.3.8 Cultural Resources, line 21 The long term impacts should be defined using NEPA terminology long-term, direct/indirect, adverse, etc. As much as possible these should be factually described rather than qualitatively labeled. ] C46

5.3.8 Cultural Resources, Line 22 Historic fabric should be changed to historic properties. ] C47

5.6 Irreversible and Irretrievable Commitments of Resources Given that both Alternatives 1 and 2 had moderate to major adverse impacts to historic properties, the NPS suggests that some cultural resources may have irreversible impacts or be lost. ] C48

Mitigation Because there would be adverse impacts to cultural resources there will need to be a discussion of mitigation measures to avoid or minimize these impacts. ] C49

The National Park Service looks forward to the continued consultation associated with this project. If you have any questions regarding our comments, please contact Barbara Alberti, Superintendent, American Memorial Park and War in the Pacific National Historical Park at 671-477-7278, extension 1003, or by email ([barbara\\_alberti@nps.gov](mailto:barbara_alberti@nps.gov)).

Sincerely ,

Christine S. Lehnertz  
Regional Director, Pacific West Region

Atch:1

Cc w atch:  
PWR-CR



## United States Department of the Interior

NATIONAL PARK SERVICE  
Pacific West Region  
909 First Avenue, Fifth Floor  
Seattle, Washington 98104-1060



H3417 (PWR-CR)

June 25, 2012

William Grannis, Environmental Program Manager  
Department of the Air Force  
HQ PACAF/A7AV  
25 E Street, Suite B-206  
Joint Base Pearl Harbor-Hickam, HI 96853-5420

RE: Request for NPS Review of Draft Phase I Cultural Resources Survey Supporting the Environmental Impact Statement for Divert Activities and Exercises on Saipan Commonwealth of the Northern Mariana Islands

Dear Mr. Grannis:

Thank you for the invitation to review the Draft Phase I Cultural Resources Survey Supporting the Environmental Impact Statement for Divert Activities and Exercises on Saipan Commonwealth of the Northern Mariana (the Survey).

The National Park Service (NPS) is delegated monitoring and technical assistance responsibilities by Congress to ensure that National Historic Landmarks (NHL) retain the highest level of integrity. Our responsibilities include review and formal comment on individual proposed actions within National Historic Landmarks as well as the cumulative effect of changes through time on NHL properties. The NPS also prepares, reviews, and provides technical assistance in the preparation NHL nominations. It is our understanding that your request for NPS review is not part of a NHPA Section 106 consultation; rather it is a request for technical assistance prior to your development of alternatives under NEPA and prior to your assessment of effects. It is in the capacity of providing technical assistance that we have reviewed and are offering comments on the Survey. Specifically, the Air Force has requested NPS to evaluate and provide comments on the findings of eligibility presented in Chapter 9 of the Survey.

To best address the findings of the Survey, NPS comments are focused on a broader discussion about the Landing Beaches Aslito/Isley Field, Marpi Point National Historic Landmark District (NHL), as well as the method and process for identifying additional contributors and for determining when previously identified contributors no longer contribute to a NHL. We believe this discussion will prove beneficial for this and other projects involving NHLs.



As noted in May 25, 2012 cover letter and in the Survey, the study area for the proposed undertaking is located within the boundary of the Aslito/Isley Field portion of the NHL. It appears that in the field survey individual properties located within the NHL boundary were identified and the eligibility of each resource assessed individually for listing in the National Register of Historic Places, which serves one aspect of identification and evaluation; however, it does not adequately address these same resources as contributors to the NHL. Within the Aslito/Isley Field portion of the NHL, the NHL nomination specifically identifies two large sites, a Japanese building and other Japanese concrete structures as part of the NHL; only one building and two vehicular/aircraft parking areas were identified as noncontributing. The following excerpt from the NHL nomination provides more specific information:

*Recommended as part of a national historic landmark is the general area formerly known as Aslito Field and Isley Field to include: the site of the two B-29 runways, taxiways, and hardstands; the site of the Seventy-third Bombardment Wing's administrative area; the Japanese blockhouse on the beach at Unai Opyan; and the concrete Japanese structures associated with Aslito Field. Exempted are the modern air terminal, its vehicle parking lot, and its concrete aircraft parking area in front.*

An assessment of whether these properties still contribute to the NHL would require an evaluation of the integrity relative to the state of the properties at the time of designation. If the assessment were that contributors had lost a significant degree of integrity since designation, they would not become non contributors unless an update to the NHL nomination was prepared and accepted. The process for changing the boundary, period of significance or deeming contributors as non contributors starts with the NHL program. Based upon an update to the NHL nomination, the NHL program would make a recommendation to the NHL Committee of the NPS Advisory Board, which in turn would make a recommendation to the full Board followed by a recommendation to the Secretary of the Interior. Those determinations are not made by the SHPO. It is also important to note that the integrity of a historic site as a category of historic property is assessed slightly differently than that of a historic building or structure. Reference pages 40-41 of the National Register of Historic Places Bulletin, "How to Prepare a NHL Nomination" for additional information about sites.

As our comments indicate, assessing the eligibility of resources within a NHL requires a different process than employed in the Survey. However, the information provided in the Survey, specifically the identification of features and structures within the NHL, could serve as a good start to a much needed update to the NHL nomination for Landing Beaches Aslito/Isley Field, Marpi Point National Historic Landmark District. If you have further questions, please do not hesitate to call or email Dr. Elaine Jackson-Retondo at 415 623 2368 or [elaine\\_jackson-retondo@nps.gov](mailto:elaine_jackson-retondo@nps.gov).

Sincerely,



David Louter,  
Chief, Cultural Resources Program  
Pacific West Region



Edward J.B. Calvo  
Governor  
  
Raymond S. Tenorio  
Lt. Governor

**Department of Agriculture  
Dipattamenton Agrikottura**

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Animal Health 734-3940  
Aquatic & Wildlife Resources 735-3955/56; Fax 734-6570  
Forestry & Soil Resources 735-3949/50; Fax 734-0111  
Plant Nursery 734-3949  
Plant Inspection Facility 472-1426; 475-1427; Fax 477-9487



Mariquita F. Taitague  
Director  
  
Manuel Q. Cruz  
Deputy Director

Capt. Rebecca Heyse  
PACAFIPA  
25 E Street, Suite G-I 08  
Joint Base Pearl Harbor-Hickam  
HI 96853

July 16, 2012

Re: PACAF Divert Marianas Draft Environmental Impact Statement (EIS)  
Dear Capt. Heyse:

The Department of Agriculture's Division of Aquatic and Wildlife Resources (DA WR) received the Draft Environmental Impact Statement (EIS) for the proposed Divert Activities and Exercises, Guam and Commonwealth of the Northern Mariana Islands (CNMI) for review and comments. The letter acknowledged by Maj. Gen. Russell J. Handy, Director of Operations, Plans, Requirements and Programs, did not state when comments are due.

D50

The Draft EIS studies the potential impacts of the Proposed Action of developing divert capabilities within CNMI in the event that access to Joint Region Marianas- Andersen or other Western Pacific locations is limited or denied. The Preferred Alternative, Alternative 1, for the proposed action is Saipan International Airport (GSN). The Draft EIS also analyzed the findings for Alternative 2, Tinian International Airport. The Alternatives will require additional space to meet the needs proposed by the U.S. Air Force in an event that access to Andersen Air Force Base and other Western Pacific locations is limited or denied. The Draft EIS addressed environmental issues as required through the NEPA process. However, prior to the release of the Draft EIS, the Nightingale reed warbler (*Acrocephalus lusciniia*) study was not completed. The analysis of the reed warbler study is very important to be able to provide more constructive comments regarding the protection of this endangered species. Please find attached our comments pertaining to the Draft EIS. We look forward to the Final EIS and the incorporation of our concerns in the final comment.

D51

Sincerely,  
**MARIQUITA F. TAITAGUE**

No.	Title	Page	Line	Column	Subject	Statement	Comment	commentor
1	Noise	3-3	3		Existing Conditions	The noise analysis contained in the Draft EIS is based upon readily available background information and data that were current at the time of the analysis. Refinement of the noise analysis is an ongoing process and will be finalized based on Draft EIS comments prior to the Final EIS.	Noise analysis should include impacts to migratory birds and endangered species in the area. Noise impacts on protected species should be determined and mitigated to avoid any 'harm, harassment, or alteration' to the protected species behavior.	JQ
- M167								
2	Geological and Soil Resources	3-25	1-2		Existing Conditions	Limestones and calcareous deposits compose about 90 percent of the surficial geology on Saipan, with volcanic rocks exposed on 10 percent of the land surface (from erosion and weathering).	Mitigation to control and prevent further erosion at the proposed site must be implemented in duration of the project and thereafter. Methods should not be restricted or limited to silt curtains, other methods should be employed and managed accordingly for effectiveness.	JQ
- M144								
3	Geological and Soil Resources	3-25	8-13		Existing Conditions	Limestones in Saipan are also highly permeable, which indicates the connectivity of pores within the rock. A rock with a higher permeability has a greater ability to transmit the flow of groundwater. Volcanic rocks on Saipan typically are poorly sorted and have undergone secondary alteration that inhibits the flow of groundwater. However, faults transect the island in a north-northeast direction, complicating the sequence and porosities/permeabilities of rock units (DON 2010b). Porosity, permeability, and groundwater are further...	Contractors and the Military (AF) must develop and implement mitigation to prevent any petroleum fuel leakage to exposed limestone surface in duration of the project construction and duration of military activities.	JQ
- M145								

4	Terrestrial Biological Resources	3-39	12	Table 3.6-1. Vegetation communities associated with the new areas, as part of the proposed action	Vegetation community within the proposed action are communities important to seasonal migratory birds protected under the MBTA (mowed fields). Tangiangangan forest are important habitat for foraging and nesting like the yellow bittern and Endangered reed warbler. Mitigation actions must be developed and implemented to avoid harm to nesting, foraging, perching birds protected under the MBTA and ESA.	JQ	M159
5	Terrestrial Biological Resources	3-48	4-8	Black Noddy breeding colonies.	Noddies frequently travel along the airfield perimeter as they move between nesting and feeding sites. This activity was most pronounced during summer months. Transiting noddies were observed crossing Runway 07/23 several times during point counts. During the 2012 nightingale reed warbler surveys, a black noddy rookery, consisting of approximately 60 nests, was observed at GSN.	JQ	M160
6	Terrestrial Biological Resources	3-48	11-14	Lake Susupe	Lake Susupe is the largest permanent freshwater body on Saipan, located about 1.5 miles northwest of GSN. Although the lake is used by some waterfowl and wading birds, it is a relatively deep and open water body that provides limited habitat for most migrant and wintering species on Saipan.	JQ	M161
7	Terrestrial Biological Resources	3-48	18-19	Golf courses	There is limited information available on Lessor plover movements around Saipan, but it is likely that the plover flocks that frequent Lamlau Bay Golf Course also use GSN.	JQ	M162

8	Terrestrial Biological Resources	3-48	32-33	Reptiles and Amphibians	<p>Focused reptile surveys were not conducted and it is likely that additional native and nonnative gecko and skink species might be present in the area.</p>	<p>Native skink and gecko species are known at the preferred Alternative sites. Surveys must be conducted to determine absence/presence and mitigation should be developed and implemented in duration of construction activity at the preferred Alternative site.</p>	JQ	M151
9	Terrestrial Biological Resources	3-49	5-7	Threatened and Endangered Species: (Mariana swiftlet)	<p>Due to the absence of mature forest habitat, lack of roosting or foraging trees, and distance from roosting caves, it is unlikely that the Mariana fruit bat, Mariana swiftlet, and Micronesian megapode are present in the Project Area (Saipan).</p>	<p>The Mariana swiftlet is known to forage in areas abundant with insects, and does not restrict its foraging territories to 'mature forest habitats'. It is known that the swiftlet forages in variety of habitat types. What may not be known is, the distance away from roosting caves to the foraging territories?</p>	JQ	M152
10	Terrestrial Biological Resources	3-49	5-7	Threatened and Endangered Species: (Mariana fruitbat)	<p>Due to the absence of mature forest habitat, lack of roosting or foraging trees, and distance from roosting caves, it is unlikely that the Mariana fruit bat, Mariana swiftlet, and Micronesian megapode are present in the Project Area.</p>	<p>On page 3-39, lines 15-18, describes the canopy vegetation in the Tangiangan forest. The trees identified include: Premna, Ficus, Aldia, Morinda, Carica, and Albizia. Abundance of these tree species may not be abundant, although are present, but minimal. They serve as roosting and foraging trees for the fruit bat and should still be considered. The Final EIS must identify that these Tangrangian forest with minimal presence of the trees mentioned earlier has the potential for fruit bat habitat, and should not be 'ruled-out'.</p>	JQ	M153
11	Terrestrial Biological Resources	3-49	8-12	Threatened and Endangered Species: (Mariana common moorhen and Nightingale reed warblers)	<p>Additionally, there are no wetlands (moorhen habitat) at GSN; therefore, it is unlikely that moorhens are present in the Project Area. However, there are areas of standing water in the project area to which moorhens could be attracted. Based on the potential habitat for nightingale reed warblers and Mariana common moorhens in the Project Area, surveys were conducted to determine the presence of individuals over the course of 10 weeks from January through March, 2012.</p>	<p>Due to the potential of standing water in the project area, moorhens may be attracted. For the purpose of NEPA, the chances of moorhens being present at the project site is not truly known, not much is known what time of the day the 10 weeks of surveys were; it is known that moorhens move about in the evening and they are attracted to freshwater habitats (including standing water after a heavy down pour). Mitigation actions must be developed and implemented to address moorhens and all other protected species that 'may be attracted' at the project site.</p>	JQ	M154

Page 4

DEISDIVERTACTIVITESJUN20012.xlsx

12	Marine Biological Resources	3-60 / 61	4.1-43/1-10	3.7.2	Sea turtles	(see text)	<p>The sea turtle section references a Kolinski 1999 survey/study, published in 2001, 11 years ago. Recent information regarding sea turtles in Saipan should be included in the Final EIS. Sea turtle movements and behavior around Saipan, especially within the project area is needed information to determine 'specific' mitigation. Upgrading GSN, requires more lighting and removal of a 'natural' barrier, existing forest, may have an impact on sea turtles.</p>	JQ	M1147
13	Environmental Consequences	4-3	23-38	4.1.1.2	Aircraft Operations- Noise	<p>DEIS describes Alternative 1 Scenarios (Low, Medium, and High). Implementation is 7 a.m. -10p.m. and 10 p.m to 7 a.m., 8 weeks per year, with 4 operations per day.</p>	<p>DEIS does not indicate the preferred option for Alternative 1 (low, medium, or high scenario). Nor does the DEIS indicate what exact month implementation (use of GSN) will take place. As described in Ch. 3, Biological resources, protected species are known to nest at certain times of the year. Mitigation to avoid disturbance of nesting activity must be developed and implemented.</p>	JQ	M1168
14	Environmental Consequences	4-30	27-28	4.2.1.1	Construction Phase- Air Quality (Dust)	<p>Appropriate fugitive dust-control measures would be employed during construction activities to suppress emissions.</p>	<p>A black nobby rookerie, with 60 active nests, was discovered approximately 675 feet from the proposed project sites for construction. Mitigation to prevent dust from impacting nesting activities must be implemented in duration of the construction phase.</p>	JQ	M1163
15	Environmental Consequences	4-59	20-21	4.6.1.1	Construction Phase- Noise	<p>No loss of active breeding habitat would be expected and no effects on the rookery would be expected during construction activities due to its distance from proposed activities.</p>	<p>Noise from construction will impact breeding activities for birds in the area. Mitigation should include monitoring of nesting activities during construction phase.</p>	JQ	M1164

16	Environmental Consequences	4-60	1-11	4.6.1.1	Construction Phase-Noise	<p>More intense impacts would include behavioral change, disorientation, or hearing loss. Wildlife could be permanently displaced from the areas where the habitat is cleared and temporarily dispersed from areas adjacent to the project areas during construction periods. Increased mortality of less-mobile species would be expected as the result of unavoidable direct impacts associated with construction activities. Impacts on wildlife would be minor.</p>	<p>Not too sure how USAF determines that behavioral change, disorientation, hearing loss, displacement, increased mortality as the result of unavoidable direct impacts associated with construction activities would be minor. Majority of the bird species identified within or adjacent to the proposed project site are special-status species, protected under the MBTA and the ESA. USAF must mitigate on impacts to wildlife. There must be a fine balance to meet the requirements of the military mission and nature.</p>	JQ	M165
17	Environmental Consequences	4-62	41-42	4.6.1.2	Implementation Phase-Noise (Wildlife)	<p>The impacts of noise are considered minor because the wildlife in this area is already subjected to these impacts from the GSN. Behavioral responses reflect a variety of states, from indifference to extreme panic. To some extent, responses are species-specific.</p>	<p>5.9 increase of air operations is expected at GSN. Wildlife may be 'accustomed' to existing conditions, but may respond differently with the expected increase. Increase air traffic could result to disturbance on nesting birds resulting nest abandonment, or neonates falling off the nest. Biologists must be present to monitor nesting activities during exercises and/or during use of GSN.</p>	JQ	M166
18	Environmental Consequences	4-63	18-19	4.6.1.2	Implementation Phase-Noise (Threatened and Endangered Species)	<p>The impacts of noise are considered minor because the birds in this area are already subjected to these impacts from the GSN.</p>	<p>T &amp; E species that occur at the proposed project site, or adjacent to, are accustomed with the existing conditions present at GSN. With an expected increase of 5.9 aircraft operations, noise (and overflight shadows) may cause disturbance to the protected species. For example: opening of North runway at AAFB, fruitbat colony numbers declined after North runway was open and used periodically. 40+ bats were observed prior to the opening of the runway and slowly declined at the colony soon after the North runway was opened.</p>	JQ	M155

10. Environmental Consequences	4-63	2.5-2.6	4.0.1.2	Implementation Phase- Noise (Wetlands)	Based on the site investigations there are no wetlands in the project area. No impacts on wetlands would be expected due to activities associated with the implementation phase.	As stated earlier in the DEIS (Ch.3), there is no 'permanent' wetland at the proposed project site, however there is standing water accumulated after a rainfall. The DEIS also indicated that there is the 'potential' that this area may attract migratory birds, the moorhen, and megapode. The presence of standing water that may attract species to the area must be addressed to prevent any protected species in the area that may be harmed by the construction and/or implementation of the proposed action.	JQ	M156
20 Environmental Consequences	4-63	24	4.6.2	Alternative 2 (TNI)		Comments addressed under Alternative 1 (GSN, the preferred alternative) applies to Alternative 2 (TNI).	JQ	M157
21 Environmental Consequences	4-67	25-26	4.7.1.1	Marine Resources- Alternative 1	No impacts on marine biological resources would occur as a result of the construction phase of Alternative 1.	the proposed project requires clearing and grading as result soil will be loosened and may run-off during a heavy rains or continuous rain. Mitigation to control erosion or run-off will need to be addressed during construction and implementation phase.	JQ	
22 Environmental Consequences	4-68	3-8	4.7.1.2	Sea turtles- Noise impacts	Because sea turtles might also rely on visual cues, they might not respond to aircraft overflights based on noise alone. Sea turtles exposed to aircraft overflights might exhibit no response or behavioral reactions such as quick diving. Any behavioral avoidance reaction would be short-term and periodic and would not permanently displace sea turtles or result in physical harm. Noise from take-offs and landings would not result chronic stress because it is unlikely that individual sea turtles would be repeatedly exposed to low-altitude overflights.	Aside from noise impacts, visual cues may impact sea turtles. Visuals such as lighting may have an impact on sea turtles behavior. Lighting devices at GSN, especially near the coast, must be 'turtle friendly' lighting.	JQ	M149

23 Environmental Consequences	5-2	I	5.2.1	Table 5.2-1 List of Past, Present, and Reasonably Foreseeable Future Actions	Table 5.2-1 does not show the amount of habitat being removed for all the projects listed. The amount of habitat altered and/or cleared should be included in the Table to show cumulative impacts to wildlife habitat.	JQ	M141
24 Cumulative and Other Effects	5-14	7-8	5.3.4.1	Geological resources and soils- Alternative I, BMPs.	Implementation of erosion- and sediment-control BMPs would be expected to limit potentially adverse, cumulative impacts.	JQ	M142
25 Cumulative and Other Effects	5-14	11	5.3.4.1	Geological resources and soils- Alternative I, Soil surveys for contamination	Soil surveys should be conducted prior to any ground-disturbing activities.	JQ	M146
26 Cumulative and Other Effects	5-14	33-35	5.3.5.1	Water resources	Implementation of soil erosion and sedimentation controls and storm water pollution prevention at construction sites would minimize the potential for adverse impacts from individual construction sites and, therefore, reduce potential cumulative impacts on water resources.	JQ	M143
27 Cumulative and Other Effects	5-16	13-21	5.3.7.1	Sea turtles	Intermittent, short-term, negligible, adverse cumulative impacts on sea turtles would occur under Alternative I. Some of the DOD redevelopment projects in the region could result in increases in noise... result in an increase in noise over the nearshore waters and beaches of Saipan, this impact is expected to be negligible.	JQ	M150

28 Cumulative and Other Effects	5-16	22-28	5.3.7.1	Marine Mammals	<p>Intermittent, short-term, negligible, adverse cumulative impacts on marine mammals would occur under Alternative 1. Some of the DOD redevelopment projects in the region could result in increases in noise from low-flying aircraft or other training activities. These include activities associated with MIRC, operation of ISR/Strike Capability, and MTT activities. While these activities have the potential to result in an increase in noise over the nearshore waters Saipan, this impact is expected to be negligible. It is extremely unlikely that individual animals would be repeatedly exposed to low-altitude overflights. As such, Alternative 1 would have a negligible contribution on cumulative impacts.</p>	<p>Beside Noise, the FEIS will need to identify all possible threats or impacts, to the wildlife and their habitats of Saipan and Tinian. In addition, the FEIS will need to reference studies determining whether marine mammals, sea turtles, or other marine organisms are 'extremely unlikely to be repeatedly exposed to low-altitude overflights'. The expected 'overuse' of GSN due to meet the mission for the USAF for the MIRC, MTT, ISR/STIRKE activities, will happen. Exposure to the additional noise, fighting, burning jet fuels will have a cumulative impact to the wildlife present on land and nearshore.</p>	JQ
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M158



July 20, 2012

Captain Rebecca Heyse  
PACAF / PA  
25 E. Street, Suite G-108  
Joint Base Pearl Harbor-  
Hickam, HI 96853  
ATTN: PACAF Divert Marianas EIS

Dear Captain Heyse,

The Commonwealth of the Northern Mariana Islands (CNMI) extends our appreciation to the United States Air Force for evaluating and considering Saipan and Tinian; for affording us the opportunity to express our thoughts on this critical action; and for the CNMI to provide the location for the Divert Activities and Exercises initiative. We will continue to support and serve our Nation and the Department of Defense. The CNMI has a date with destiny and is ready to respond as the focus shifts to the Asia Pacific region.

E60

The CNMI has been and will continue to provide support for all military initiatives as the Nation and Department of Defense pivot toward the Pacific. The islands of Saipan and Tinian played major roles during World War II and Tinian in specific had the world's busiest airport during the war. The CNMI is extremely supportive of the military and openly endorses a robust military presence throughout the Commonwealth. Many joint training exercises have been conducted on Tinian and throughout the CNMI over the past 30 years.

E61

The Military Integration Management Committee (MIMC) is composed of the Governor, Lt. Governor, Senate President, Speaker of the House, and Mayor's from Saipan, Tinian, Rota and the Northern Islands. As acting chairman of the MIMC, I would like to submit the attached document which includes comments and the Governors White Paper defining our stance as the official comments of the Office of the Governor and Lt. Governor, and the MIMC on the Draft Environmental Impact Statement for Divert Activities and Exercises, Guam and Commonwealth of the Northern Mariana Islands.

Sincerely,

Lt. Governor Eloy S. Inos

Draft EIS Divert Activities and Exercises Guam and CNMI –

Government of CNMI's Official Public Review Observations / Comments

Document Reference ID: General Comments

#	Subject/Section	Page Number / Line(s)	Observation/ Issue	Comment
1	General	123, 339, 371, 472	Loss of revenue from commercial airline operations due to a closure of the airport associated with a DoD event is not addressed in the DEIS. Mitigation measures need to be identified to address this loss of revenue during times the airport is closed due to DoD activities.	Please address the issue of loss of revenue from commercial airline operations due to a closure of the airport associated with a DoD event is not addressed in the FEIS. Also, address and identify mitigation measures need to address this loss of revenue from commercial operations during times the airport is closed due to DoD activities.  E77
2	General	270	The DEIS states that there will be no more than a total of 8 weeks of divert exercises per year. The DEIS also states "this adaptive management approach ensures that any increase or changes in quality or quantity of exercises is fully analyzed on a continuing basis." The definition of an adaptive management approach does NOT guarantee that there shall NOT be more than 8 weeks of exercises per year.	Please note in the ROD the following:  If the DoD desires to increase the divert activities and exercises more than 8 weeks per year it requires the trigger to start a new NEPA process that includes public involvement/participation.  E62
3	General	NA	The DEIS does not address what would happen if there is a termination of the divert activities and exercises mission from the CNMI. There needs to be an assurance that the DoD shall properly clean-up the land and facilities to greenfield standards.	Please address in the FEIS how the DoD would clean-up the Divert facilities and land if the mission is terminated.  CNMI respectfully requests that the FEIS recommend that the ROD states that the DoD shall properly clean-up the land and facilities to greenfield standards.  E63

General - 1

Draft EIS Divert Activities and Exercises Guam and CNMI – Government of CNMI’s Official Public Review Observations / Comments

Document Reference ID: Noise

#	Subject/ Section	Page Number / Line(s)	Observation/ Issue	Comment
1	Noise	NA	The off-airport area of land that is subject to increased noise levels for Alternative 1 (Saipan) is three times greater than that of Alternative 2 (Tinian); however, the overall impacts are identified as being equivalent for both alternatives. Area of Noise Impact statistic comparison includes: Alternative 1 (Saipan) – 11,052 people and 4 schools are impacted by noise. Alternative 2 (Tinian) – 523 people and no schools are impacted by noise. This analysis is NOT accurate given the disproportionate are of land and people subject to increased noise levels for Alternative 1 (Saipan).	E94 We strongly recommend that the DoD select Alternative 2 (Tinian) as the Final Preferred Alternative since there are minimal noise impacts associated with this alternative.  If the DoD does not select Alternative 2 (Tinian) as the Final Preferred Alternative, please explain the DoD’s justification on why they would select Alternative 1 (Saipan) that has a HIGH Noise Impact on the community over an alternative that has Minimal to No Noise Impact. In addition, please explain in detail what other regulatory and non-regulatory decision making items went into the decision to select Alternative 1 (Saipan).
2	Noise	NA	Noise sensitive land uses (Koblerville Elementary School, San Antonio Elementary School, Vicente Elementary School and Southern High School) currently exist within the 650BA DNL or larger footprints in the Preferred Alternative 1 (Saipan). Schools that are currently located within the 650BA DNL noise levels and higher are limited to using their air conditioning to a few hours a day and thus it is necessary to conduct classroom activities with the windows open. Classroom activities will be highly impacted by the noise generated by divert activities during the time that the windows are open.  Mitigation measures to reduce noise impacts are NOT adequately addressed in the DEIS. Detailed mitigation measure should be included in the document.	E95 Please confirm that the Record of Decision (ROD) will include language stating that the DoD shall coordinate the schedule of all Divert Activities and Exercises with Government of CNMI and CNMI’s Public School System in order to de-conflict any potential compatibility issues associated with noise generated by the divert activities.  If the ROD will not include language to this affect is not in the ROD please explain how the DoD will guarantee that coordination for scheduling divert activities will occur with these agencies.  Recommend that the DoD sound attenuate the schools if de-confliction of noise impacts are not guaranteed through scheduling.
3	Noise and Environmental Justice	NA	Per the DEIS an estimate of 11,052 people live within the 650BA DNL or larger footprint within the Preferred Alternative 1 (Saipan). This is approximately 25% of the Island of Saipan’s population and equates to approximately 2,768 low income housing units that are located within the area and are highly impacted by noise from the divert activities. It is critical that this issue be well mitigated if the Saipan Alternative is selected as the location for the divert activities.	E73 If the Preferred Alternative 1 (Saipan) is selected, highly recommend that the ROD include language that states that the DoD shall pay for sound attenuation for housing units and schools within the impacted area and/or coordinate and advocate with the FAA to fund an FAA Sound Attenuation Grant that will sound attenuate the low income housing units within the noise footprint. Recommend that this occur within the first year that the divert activities are bedded down.  Recommend that DoD assist CNMI in coordinating and preparing the FAA Sound Attenuation Grant.  If the above language is not part of the ROD, please explain in detail how the DoD plans on mitigating this issue.
4	Noise	Page 4-6 Lines 6 - 7	The analysis of the High Scenario of Alternative 1 states “under the Medium Scenario, approximately 37,115 acres consists of non-airport property.”	E96 This should be corrected to “under the High Scenario, ...”

Noise - 1

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**Document Reference ID: Noise**

#	Subject/ Section	Page Number / Line(s)	Observation/ Issue	Comment
5	Noise and Socio Economic	NA	The DEIS does not adequately address and is very vague regarding the number of tourist that will be impacted by noise, the loss of revenue associated with tourism within this area and how this impact would be mitigated for Alternative 1 (Saipan). The following tourism areas that are highly impacted by noise for this alternative include the Pacific Island Club (PIC) Resort, Coral Ocean Point Resort, Lao Lao Bay Golf and Resort, Ladder Beach and Obyan Beach.	Explain in detail the total impact on tourism from noise impacts and how the DoD will mitigate the loss of revenue associated with this impact.

E74

Draft EIS Divert Activities and Exercises Guam and CNMI –  
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Document Reference ID: Air Quality Comments

#	Subject/Section	Page Number / Line(s)	Observation/ Issue	Comment
1	Air Quality	NA	Impacts on air quality are not adequately addressed to the level of analysis required by federal and local regulations. The impacts resulting from both Alternatives 1 and 2 are identified as being equivalent; however, the Existing Conditions of each are identified as being unclassifiable.	Address and consider in more detail in the FEIS the level of analysis required by federal and local air quality regulations for each alternative. E52
2	Air Quality	NA	The EIS states that CNMI DEQ requires all air permit applications to include dispersion modeling for comparison against NAAQS for compliance. The analysis does not appear to include air quality of pollutant dispersion modeling, thus does not adequately analyze and address the concern of localized air quality impacts.	Address and consider in more detail air quality of pollutant dispersion modeling required by NAAQS in the FEIS. E53
3	Air Quality	NA	The proximity of the nearest residential population should be taken into consideration as a result of the potential for impaired local air quality and its effect on economically disadvantaged or health impaired communities. The DEIS inadequately addresses this issue.	Prior to finalizing the EIS and making a determination of the preferred alternative, a more thorough technical evaluation and air quality modeling is needed to understand the localized impacts due to proposed operations as well as fuel storage. Please document the results in the FEIS. E54

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**Document Reference ID: Geological Resources Comments**

#	Subject/ Section	Page Number / Line(s)	Observation/ Issue	Comment
1	Geological Resources	NA	The evaluation of proposed alternatives does not consider proper mitigation of farmland. The evaluation does not consider the value of prime farmland in the CNMI region as it affects the overall economy and quality of life.	Address and consider the value and mitigation required for farmland impacts for each alternative in the FEIS. E64
2	Geological Resources	Page 4-51 Lines 39-45	The development proposed is located in Seismic Zone 3, which would require structures to be designed and built in conformance with Uniform Building Code for this area. The action states that this "should occur" and does not express a clear commitment to building safety.	The FEIS shall state that the DoD shall build all divert facilities in accordance with Seismic Zone 3 Uniform Building Code. E66
3	Geological Resources	Page 4-52 Lines 21-23	The divert activities will have an increased impact to the Philippine Sea and other nearby water bodies. This is of great concern to CNMI.	Address in the FEIS this issue and level of impacts to the Philippine Sea and other nearby water bodies. E67
4	Geological Resources	Page 4-52 Page 4-53	The EIS states that the potential impacts of Alternative 2 (Tinian) are anticipated to be similar to, but greater than, those described for alternative 1 (Saipan) as a result of the introduction of a greater level of impervious surface. Mitigation measures for the use of alternative materials should be considered to reduce impacts from impervious surfaces resulting from both alternatives should be considered.	Address and consider in the FEIS the level of technology and best practices that would the impacts associated with impervious surface issues. E68

Geological Resources - I

Draft EIS Divert Activities and Exercises Guam and CNMI –  
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Document Reference ID: Water Resources Comments

#	Subject/Section	Page Number / Line(s)	Observation/ Issue	Comment
1	Water Resources	4.5.1 4.5.2	The overall impacts for both alternatives do not take into consideration the use of improved materials and technologies that would allow for reduced impacts (runoff and sedimentation) to water bodies.	E84
2	Water Resources	4-55 Line 20-21	The proposed actions do not consider the alteration of flood zones as a result of regarding and changes to ground levels.	E85
3	Water Resources	4-54 4-55	Impacts resulting from Alternative 1 are identified as degradation with a broad range of pollutants affecting highly permeable surfaces that could be highly susceptible to contamination. The commitment to reducing potential impacts hinges on that the infiltration features "should not" be located in close proximity to wellhead protection areas of GSN (Isley Field) in order to ensure protection of a safe drinking water supply.	E86
4	Water Resources	Overall	The impacts resulting from Alternative 2 are identified as long term whereas the impacts resulting from Alternative 1 are identified as short term. The rationale behind the duration of impacts is not clear and requires further evaluation and clarification.	E87
5	Water Resources	4.5.1 4.5.2	The assessment of Alternative 2 is based upon the extent of impervious surface introduced and does not consider alternative methodologies to reduce these surfaces or the imperviousness of these surfaces.	E88
6	Water Resources	NA	The analysis states "without proper site design, the implementation of Alternative 1 could lead to a depletion of groundwater resources and increased salt water intrusion to drinking water wells."	E89
7	Water Resources	4-54	The EIS states that "designs could incorporate structural storm water management methods such as storm water retention ponds, shallow infiltration basins, and infiltration trenches, to collect storm water from the new impervious surfaces and allow water to infiltrate the ground to help restore or enhance recharge rates"	E90

Water Resources - 1

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**Document Reference ID: Water Resources Comments**

#	Subject/ Section	Page Number/ Line(s)	Observation/ Issue	Comment
8	Water Resources	NA	Potential major adverse impact as a result of storm water sheet runoff or especially accidental petroleum spills.	An enhance SPCC program and controls need to be assessed in both alternatives. <span style="float: right;">E91</span>
9	Water Resources	NA	The increase in impervious surfaces has a greater effect on Saipan due to the recharge of the water aquifer and impact to the Waste Water Treatment Demands Alternative 1: total increase in impervious surface area of 2,392,200 sf Alternative 2: total increase in impervious surface area of 4,090,800 sf	The impact of the increased WTF demands needs to be determined. <span style="float: right;">E92</span>
10	Water Resources	NA	There is a need for consideration of alternative materials such as permeable surfaces that would reduce runoff and infiltration rates that would affect water resources, where practicable. The evaluation and assessment of Alternative 2 identifies potential impacts as being slightly greater than alternative 1.	The use of improved technologies and surface materials should be considered to mitigate impacts that could have the potential to result in insignificant impacts. <span style="float: right;">E93</span>

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Document Reference ID: Terrestrial Biological Resources Comments

#	Subject/Section	Page Number / Line(s)	Observation/ Issue	Comment	
1	Terrestrial Biological Resources	NA	The nightingale reed warbler is listed as a T&E species. This species is typically found in Tangantangan forest on Saipan.	Address the removal of Tangantangan forest is identified as insignificant and does not consider its overall effect on species that depend on it for habitat in the FEIS.	E69
2	Terrestrial Biological Resources	NA	Migratory bird populations and threatened and endangered species are identified as being significantly impacted for Alternative 1 on Saipan. Potential major adverse impact on vegetation (nightingale Reed Warbler) surrounding Saipan airport are present and could result in reduction and destruction of habitat.	The value placed on these species is not consistent with federal protection and value. Address the level of analysis and concern for T&E species such as the nightingale reed warbler in detail and per the federal protection and value and consider their importance and history associated with its habitat on CNMI, particularly Saipan.	E70
3	Terrestrial Biological Resources	NA	On Tinian, there are no endangered species within the proposed divert base footprint that would require mitigation, whereas divert activities in Saipan proposed divert base footprint would likely necessitate a minimum of \$600K in the mitigation bank.	Address this issue in more detail within the FEIS and take this issue into more consideration when determining the Final Preferred Alternative.	E71
4	Terrestrial Biological Resources	NA	Tangantangan forest was intentionally aerially seeded by the US Navy after World War II and has served as a critical habitat for the Nightingale reed warbler on Saipan.	Consider and address in the FEIS the effects of eliminating portions of this species' habitat and address their natural resource and cultural resource affects as part of the cumulative impacts analysis.	E72
5	Terrestrial Biological Resources	NA	Impacts: It is important that the EIS consider and address, at an overall planning level, the integrated use of lands within CNMI, especially Saipan and Tinian related to the Record of Decision for the Military Buildup for the US Marines and the use of Tinian, use of Tinian as part of the MIRC and the proposed Divert Activities.		E73

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Document Reference ID: Cultural Resources Comments

#	Subject/Section	Page Number / Line(s)	Observational Issue	Comment
1	Cultural	NA	The proposed action for Alternative 1 (Seipon) would result in minor adverse effects on Seipon International Airport, which is a National Historic Landmark. The DEIS states that the Section 106 consultation is ongoing. The identification of mitigation “if any” is needed to provide a full understanding of potential impacts on these important cultural resources on Seipon.	E-55
2	Cultural	NA	The Section 106 consultation should be completed prior to determination of final EIS preferred alternative selection. The full effects of both alternatives cannot be determined prior to completion of NEPA consultation which requires further evaluation and clarification.	E-56
3	Cultural	5-17	The proposed paving actions along the north side of GSM runways and the proposed BEAR-AK site at the existing airport lead between Runway Three and Airport Road. The Impacted Resources are concrete air raid bunkers associated with the Japanese military built up before World War II and destroyed during World War II. Six such structures lie in very close proximity to the proposed parking aprons with two lie at one edge of the proposed BEAR-AK site. While direct avoidance is planned, the structures are susceptible to secondary impacts from vibration-related deterioration due to heavy traffic. In addition, the (EIR/EA) could face an increased risk of vandalism from military and civilian personnel.	E-57
4	Cultural	3-60	The Isay Field Historic District contains historic structures and features associated with the construction of Japanese Helio Field beginning in 1934.	E-58
5	Cultural	4-71	Possible major, direct, adverse impacts on cultural resources during implementation include those resulting from increased traffic, partial destruction or vandalism, both, and other effects resulting from increased use of the area. Such impacts could diminish or destroy the visual integrity of these resources by affecting design, materials, or workmanship of structures and the location of archaeological materials in the event of looting. Large encroachments of personnel or storage of material on aprons and runways would have detrimental effects on safety, feeling, and association.	E-59

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Document Reference ID: Recreation Comments

#	Subject/Section	Page Number / Line(s)	Observation/ Issue	Comment
1	Recreation	NA	The proposed parking aprons along the north side of GSN runways and the proposed BEAR-III site at the existing soccer field between Flame Tree and Airport Roads	The soccer field is often used by numerous high schools and recreational league sports teams. Please indicate how the scheduled training exercises will be coordinated and communicated to the community to avoid scheduling conflicts.
2	Recreation	NA	The noise impacts will have a significant effect on the following sites: Lao Lao Bay Golf Course, Coral Ocean Point Golf Course, Obyan Beach, Ladder Beach, Forbidden Island, and the Pacific Islands Club Resort and Waterpark.	Please address in the FEIS. In addition to the residents affected, the number of tourist affected by noise who will be using these recreational facilities should be taken into account.

-E75

-E76

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Document Reference ID: Land Use Comments

#	Subject/ Section	Page Number / Line(s)	Observation/ Issue	Comment
1	Land Use	NA	The use of land on island communities has significant impact on the local people and their culture due to the limited and scarcity of land for competing uses and needs.	The value of scarcity of island land is not addressed in the FEIS. Please assess this issue in the FEIS and consider it in determining the Final Preferred Alternative. <span style="float: right;">- E82</span>
2	Land Use	NA	Reconsider acquiring an additional 40+ acres associated with Alternative 1 (Saipan) vs. the use of the extensive amount of land already under lease by the DOD on Tinian. This issue needs special consideration. The Covenant DOD leased lands on Tinian are adjacent to the Tinian International Airport and are currently designated for DoD operations.	Please explain the rationale for why DoD is asking for an additional 40+ acres of land on Saipan for Alternative 1 when they have approximately 18,000 acres of existing DoD leased lands located adjacent to the Tinian International Airport which currently are minimally used for DoD operations.  In the spirit of the Covenant, please reconsider the Covenant lands on Tinian for the Divert Activities and Exercises. <span style="float: right;">- E78</span>
3	Land Use	NA	Approximately 17,799 acres of land on Tinian and 177 acres of land on Saipan are part of the Covenant. The Covenant, an agreement between the US and CNMI was codified at 48 U.S.C. § 1801. Section 803 Use of the leased lands on Tinian would provide a beneficial impact to the DoD operation and its commitment to Tinian.	Please include in the DEIS an overall assessment of land use per the letter and spirit of Section 803 of the Covenant that established the Commonwealth of the Northern Mariana Islands. <span style="float: right;">- E79</span>
4	Land Use	NA	Cumulative Impacts: It is important that the DEIS consider and address at an overall planning level the integrated use of lands within CNMI, especially Saipan and Tinian related to the Record of Decision for the Military Buildup for the US Marines and the use of Tinian, use of Tinian as part of the MERC and the proposed Divert Activities.	Please address in the FEIS the positive benefits associated with collocating DoD joint operations on Tinian. <span style="float: right;">- E81</span>

Land Use - I

Draft EIS Divert Activities and Exercises Guam and CNMI –  
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**Document Reference ID: Socioeconomics and Environmental Justice (EJ) Comments**

#	Subject/ Section	Page Number / Line(s)	Observation/ Issue	Comment
1	Socioeconomic & EJ	NA	Alternative 1 (Saipan) has the greatest negative impact (noise) on the lowest economic group of citizens in comparison to the positive effect on the community and citizens on Tinian. According to Alternative 2 (Tinian), Alternative 2 (Tinian) would eliminate the potential for any environmental justice concerns, by reducing or eliminating the noise and associate impacts on the population in the villages of Kobleville, Dan Dan, and San Antonio.	We strongly recommend that the DoD select Alternative 2 (Tinian) as the Final Preferred Alternative since it eliminates any potential socioeconomic and environmental justice impacts.
2	Socioeconomic & EJ	NA	The initial Tinian investment would be slightly higher if viewed as a standalone action. However, as an initial component to a long term strategic initiative, this delta in costs are insignificant and are easily off-set by long term return on investment for CNMI. Investing in the Tinian alternative is in concert with and reinforces DOD’s needs in the Pacific Region. The DEIS lacks in defining and quantifying the economic benefit and is too vague to determine a valid assessment between the alternatives.	The value of the potential economic benefits be clearly defined and quantified in the Final EIS to communicate the economic value of the one-time capital investment (construction) as well as the potential annual revenue (generated from the divert activities usage).
3	Socioeconomic & EJ	NA	The development of the port in Tinian can underpin the potential economic development for the economy of Tinian. Although the value of the investment will benefit CNMI with either alternative, the greatest long term economic impact will be realized with alternative 2 (Tinian) being the divert installation.	The EIS needs to take this issue into consideration when developing the FEIS.



Ramon M. Dela Cruz  
Mayor

## Office of the Mayor

MUNICIPALITY OF TINIAN AND AGUIGUAN  
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July 23, 2012

Captain Rebecca Heyse  
PACAF / PA  
25 E. Street, Suite G-108  
Joint Base Pearl Harbor-  
Hickam, HI 96853

**ATTN: PACAF Divert Marianas EIS**

Dear Captain Heyse,

As the mayor of the Municipality of Tinian and Aguiguan, I am submitting the attached three documents for your review. They include comments from Governor of the CNMI Benigno Fitial and his White Paper defining the Military Integrated Management Committee's stance on the Draft Environmental Impact Statement for Divert Activities and Exercises, Guam and Commonwealth of the Northern Mariana Islands; a resolution from the CNMI Senate; and our comments on the draft EIS from the Tinian Joint Leadership. All three share two common perspectives. First, they all support the construction of an Air Force Divert Base on either Tinian or Saipan. And, second, they all agree that Tinian is the best location for the Divert Base.

F98

The people of Tinian have strong feelings about the Divert Base being constructed on Tinian, for several good reasons. Tinian was the world's busiest airport during World War II. Many joint training exercises have been successfully conducted on Tinian over the past 30 years, with the recent Marine Air Group 12 operations on both West Field and North Field being the best example of potential air operations on Tinian. Additional land would not need to be acquired if the base to be built on Tinian. Finally, and perhaps most important, the people of Tinian have been waiting patiently for the promised military development of their island since they agreed to lease two-thirds of their island to the United States Department of Defense in 1975.

F99

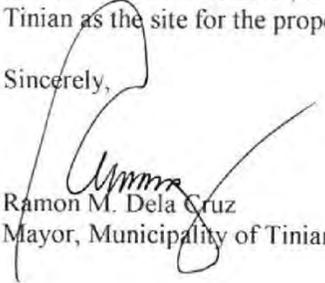
Although it might be true that it would be easier to establish the Divert Base on Saipan at this time, it would be in the best long-term interest of both the United States and the Commonwealth of the Northern Mariana Islands to have the base built on Tinian. If built on Tinian, the Air Force could obtain 100% operational resiliency. If a true national emergency were to arise, the Divert Base on Tinian could be expanded onto adjacent lands already leased by the Department of Defense.

F100

Construction of the Divert Base on Tinian would spark the economic development of this island and facilitate the development of other military activities on Tinian's military leased lands. } F101

For all the above reasons, and those listed in Tinian's position paper, we urge you to choose Tinian as the site for the proposed Divert Base.

Sincerely,



Ramon M. Dela Cruz  
Mayor, Municipality of Tinian and Aguiguan

SEVENTEENTH NORTHERN MARIANAS COMMONWEALTH LEGISLATURE

SEVENTH SPECIALSESSION, 2012

S.J.R. NO. 17-20

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**A SENATE JOINT RESOLUTION**

Supporting the use of the Tinian International Airport, Tinian, as the preferred site for the United States Air Force's proposed action to expand US strategic interests and meet Department of Defense mission requirements in the western Pacific region.

1           **WHEREAS**, the United States Air Force (USAF) is currently seeking to improve  
2 an existing airport or airports in the Commonwealth of the Northern Mariana Islands  
3 (CNMI) in support of expanding US strategic interests and Department of Defense  
4 (DOD) mission requirements in the western Pacific region; and

5           **WHEREAS**, the USAF's proposed action to improve and utilize an existing  
6 airport or airports in the CNMI will be a welcome addition to both the Commonwealth  
7 and its economy; and

8           **WHEREAS**, in June 2012, the USAF published a Draft Environmental Impact  
9 Statement for Divert Activities and Exercises for Guam and Commonwealth of the  
10 Northern Mariana Islands, expressing its specific need to have an existing divert or  
11 contingency airfield on US territory in the western Pacific designed and designated to  
12 provide strategic operational and exercise capabilities for US forces when needed, and  
13 humanitarian airlift and disaster relief in times of natural or man-made disasters as  
14 mandated by Title 10 USC § 8062; and

15           **WHEREAS**, the USAF Draft Environmental Impact Statement for Divert  
16 Activities and Exercises for Guam and Commonwealth of the Northern Mariana Islands  
17 chose the Saipan International Airport on the island of Saipan as its preferred alternative  
18 for its proposed action; and

SENATE JOINT RESOLUTION 17- 20

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1           **WHEREAS**, the Saipan International Airport would require an additional 40  
2 acres of land to be leased from the Commonwealth, and the operational resiliency to the  
3 United States Air Force to be reduced to 87%; and

4           **WHEREAS**, the Saipan International Airport would also require ammunition to  
5 be transported several miles through heavily populated residential and commercial areas  
6 to the base; and

7           **WHEREAS**, as noted in the draft Environmental Impact Statement, utilizing the  
8 Saipan International Airport would be of minor importance to Saipan's economy, while  
9 utilizing the Tinian International Airport would provide a significant stimulus to the  
10 general economic development of this underdeveloped land and decrease the need for  
11 federal subsidies; and

12           **WHEREAS**, the island of Tinian has readily available land near the Tinian  
13 International Airport for any needed expansion, including Runway Two of the World War  
14 II West Field, already leased by the US Government for defense responsibilities and of no  
15 additional cost to the United States of America; and

16           **WHEREAS**, the Tinian International Airport runway could be extended to  
17 provide 100% resiliency to the U.S. Air Force needs; and

18           **WHEREAS**, the Tinian International Airport's location is ideal for the Air  
19 Force's training and exercises, as it is far from any residential areas and cultural  
20 landmarks; and

21           **WHEREAS**, improving the Tinian International Airport would greatly assist  
22 Tinian's local economy by allowing for the possibility of international flights, and the  
23 export of fresh and frozen produce and meats; and

24           **WHEREAS**, the completion of the Divert Base would also stimulate Army, Army  
25 Reserve, National Guard, Navy, and its Marine Corps, to take better advantage of training  
26 opportunities on Tinian; and

27           **WHEREAS**, the Tinian International Airport meets all United States Air Force  
28 criteria and its use would ensure that the Air Force's mission mandated by Title 10 USC §  
29 8062 is met; and

SENATE JOINT RESOLUTION 17- 20

1           **WHEREAS**, on October 20, 2011, the Tinian Delegation submitted a letter of  
2 support for the United States Air Force’s use of the Tinian International Airport and the  
3 island of Tinian; and

4           **WHEREAS**, the people of Tinian are also in support of the use of their airport  
5 and any related developments required by the US Air Force in order to maintain its  
6 operations, training, and humanitarian relief;

7           **NOW, THEREFORE, BE IT RESOLVED**, by the Senate of the Seventeenth  
8 Northern Marianas Commonwealth Legislature, the House concurring, hereby supports  
9 the island of Tinian as the United States Air Force’s preferred alternative for its proposed  
10 action, and the Tinian International Airport as the Commonwealth of the Northern  
11 Mariana airport for the United States Air Force to improve in support of expanding US  
12 strategic interests and Department of Defense mission requirements in the western Pacific  
13 region; and

14           **BE IT FURTHER RESOLVED**, that the President of the Senate and the  
15 Speaker of the House of Representatives shall certify, and the Senate Legislative  
16 Secretary and the House Clerk shall attest to the adoption of this joint resolution, and  
17 thereafter the Senate Clerk shall transmit certified copies to: the Honorable Barack  
18 Obama, President of the United States of America; the Honorable Leon Panetta,  
19 Secretary of Defense; the Honorable Michael B. Donley, Secretary of the Air Force;  
20 Senator Carl Levin, Chairman, the United States Senate Armed Forces Committee;  
21 Honorable Gregorio “Kilili” Camacho Sablan, CNMI Delegate to the United States  
22 Congress; the Honorable Madeleine Bordallo, Guam Delegate to the United States  
23 Congress, the Honorable Benigno R. Fitial, Governor of the Commonwealth of the  
24 Northern Mariana Islands; and the Honorable Eliceo “Eli” D. Cabrera, Speaker of the  
25 House.

Date: 07/16/12

Introduced By: /s/  
Sen. Jude U. Hofschneider

June 26, 2012

Testimony on Draft Environmental Impact Statement for Divert Activities and Exercises, Guam and the Commonwealth of the Northern Mariana Islands by Don A. Farrell, P.O. Box 5, Tinian MP 96952.

First and foremost, the establishment of an Air Force Divert Base in the CNMI is a welcome addition to the economy of the islands, whether it is constructed on Saipan where better housing and recreational opportunities are currently available for Air Force personnel, or on Tinian where the United States Air Force can obtain 100% of its operational resiliency in case of need, albeit with a lesser number of high end hotels, restaurants and golf courses.

G102

However, higher echelon Air Force decision makers should be aware that the draft EIS for a Divert Base in the Northern Mariana Islands is flawed both fundamentally and technically with regard to the Tinian option. There are significant costs that have not been clearly identified in either the EIS or the Executive Summary and there are significant recent developments on Tinian that have not been identified.

Fundamentally, the EIS fails to recognize either the letter or the spirit of the Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America, codified at 48 U.S.C. § 1801 .

Section 803 of the Covenant provides for the joint use of Tinian Harbor and Tinian West Field International Airport. When developed in the early 1970s it provided sufficient land for ground, sea and air training exercises to support air training and maneuvers, and an ammunition storage area. To this date, these lands have not been utilized and remain available to the Department of Defense. Operations on Tinian, therefore, are free to the military services, whereas they will have to pay to land aircraft at Saipan.

Most important, Section 806 (a) of the Covenant provides that the United States will continue to recognize and respect the scarcity and special importance of land in the Northern Marianas. If the United States must acquire any interest in real property which it does not obtain under the Covenant, the United States will only seek to acquire such land if the public enterprise cannot be accomplished with a lesser interest. The lesser interest, in this case, would be taking advantage of the lands already under lease on Tinian. Essentially, this precludes the lease of additional lands on Saipan for a purpose that can be fulfilled on Tinian leased lands.

G103

The Covenant is also said to be the general United States policy with respect to land acquisition in the Northern Mariana Islands. It provides significant protections against the arbitrary or improper use of the authority of the United States to acquire property in the Commonwealth. This is especially so in view of the fact that Subsection (b) provides that no interest in real property will be acquired by the United States unless the acquisition has been duly authorized by the Congress and appropriations are available to pay the landowner just compensation. It is difficult to speculate on the cost of a long-term lease on 40 acres of prime land at Saipan International Airport, however, it would certainly be in the millions of dollars - far more than the cost of repairs to the breakwater at Tinian Harbor, for instance.

The draft Air Force EIS also flies in the face of the Congressional mandate to streamline the DoD by establishing inter-service operations. This September there will be a joint Army-Navy training operation on North Field. At about the same time the III MEF will conduct a joint Navy-Marine Corps training operation on North Field. Most significantly, the recent Marine Air Group - 12 exercise on both West Field, establishing restraining wires for F-18 hot refueling operations, and on North Field, establishing an expeditionary airfield, demonstrated the island's ability to support major air operations. Despite all this joint inter-service activity on the part of the Army, Navy and Marine Corps, the Air Force-created draft EIS for a Divert Base purports to separate Air Force operations from the other services currently taking advantage of the joint-use opportunities available on existing Tinian leased lands.

G110

Technically, the draft EIS is out of date. It fails to take into account several developments on Tinian in the last 2 years. The Record of Decision issued by the US Marine Corps in September 2010 created live fire rifle ranges on Tinian, primarily for the use of the US Marine Corps, yet available to all other federal agencies with a need to maintain small arms certification. Furthermore, Tinian was visited by high ranking representatives of the Japanese Self-Defense Force (JSDF), which co-funded the recent MAG -12 operations on Tinian. They are now considering joint USMC-JSDF training exercises on Tinian. Having a fully operational air base on Tinian with refueling capabilities will support the Marine Corps effort on Tinian as well as joint training operations with other US and JSDF teams.

G111

Although it is true that Saipan has more high end hotels than Tinian, the Tinian Dynasty Hotel and Casino has 412 rooms with a total capacity of well over 700, more than enough to support the personnel recommended in the EIS. Furthermore, if the Divert Base is constructed on Tinian, the refueling system would make the airport fully capable of receiving foreign jet aircraft. This would undoubtedly stimulate investors who have already purchased casino licenses to begin construction on their hotel complex.

G106

Just this month, Matua Bay resort broke ground on a new golf course to be located along beautiful Nassarino Beach on Southwestern coast of Tinian,

The draft EIS goes to lengths to discuss the "dilapidated condition of the Tinian Harbor and the Tinian Dump. Currently, the fuel dock at Tinian Harbor is receiving extensive repairs, including a new sea wall, bollards and fenders. Recently, the Tinian joint leadership has concluded negotiations with the CPA and OIA to repair the two finger piers at the dock. This expenditure of CNMI CIP funds will undoubtedly lead to funding to repair the Breakwater.

G107

New equipment is being purchased to maintain the existing Tinian Dump, and design work is already at 30% completion for a new solid waste transfer station and a new landfill. Together, they will be more than adequate to handle all solid and liquid wastes produced by the Divert Base.

The stated primary justification for building the Divert Base is to give resiliency to the Air Force's primary mission in the Pacific by assuring a fall back base in case Andersen Air Force Base is compromised or if a natural or man-made disaster elsewhere mandates humanitarian relief. By utilizing Tinian, the United States Air Force could accomplish its mission 100%, whereas if the facility is established on Saipan they would lose 17% operational opportunity. The runway at Tinian's West Field International Airport could easily be extended to provide the runway necessary for the largest cargo and aerial refueling aircraft in the Air Force inventory.

G108

On Tinian, there are no endangered species within the proposed divert base area that would require mitigation, whereas construction in Saipan would likely necessitate a \$600,000 deposit in the mitigation bank.

G112

The population of Tinian is not 5,000 people, as stated in the EIS. It is barely 3,000. Utilizing Tinian for the planned 8 weeks per year for training exercises will interfere less with local air traffic control than on Saipan, cause less effective noise pollution for the local community, and, because of the Covenant, the Air Force will not have to pay landing fees on Tinian. During the recent MAG - 12 operation at West Field International Airport, F-18 Hornets practiced rotating hot-refueling operations throughout the day for a full week with no appreciable distress to the community. Landing KC-135s as well as fighter jets at Saipan International Airport would cause considerable distress to the local population, and particularly to Kobler Elementary School and Southern High School, both of which are in the flight pattern.

G113

Furthermore, as noted in the draft EIS, while the construction of the Divert Base on Saipan will be of relatively minor importance to that economy, utilizing Tinian will provide a significant stimulus to the general economic development of this underdeveloped island, therefore decreasing the need for federal subsidies; building the Divert Base on Tinian will mean the completion of the West Field International Airport and the arrival of international commercial aircraft, allowing not only the importation of tourists, but the export of fresh and frozen produce and meats; completion of the Divert Base will stimulate the Army, Army Reserve, National Guard, Navy, and its Marine Corps, to take better advantage of training opportunities on Tinian.

G114

Finally, and most important to the people of Tinian, building the Divert Base on Tinian will begin to fulfill a 40-year-old pledge to the people of Tinian. Before the 1975 plebiscite to ratify the Covenant, representatives of the United States of America., both military and civilian, led the people of Tinian to believe that if they voted in favor of the Covenant - including the technical agreement to lease two-thirds of their island for a hundred years - the United States would build a large multi-service training base on Tinian and the people of Tinian would benefit from the economic development. Other than few a few scattered training exercises, no significant military development has occurred on Tinian. The port of Tinian, built by Navy Seabees during World War II has been neglected, as have the access roads on the military leased lands. Building the Divert Base on Tinian will begin to allay the concerns of some Tinian residents who are now questioning the wisdom of their 1975 decision.

G104

[[signed Don Ferrell 06-26-23]]



# SENATOR JUDITH P. GUTHERTZ DPA

CHAIRPERSON, COMMITTEE ON THE GUAM MILITARY BUILDUP & HOMELAND SECURITY  
31st Guam Legislature • *I Mina'trentai Unu na Liheslaturan Guahan*  
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## VICE CHAIRPERSON

• COMMITTEE ON RULES, FEDERAL, FOREIGN & MICRONESIAN AFFAIRS, AND HUMAN & NATURAL RESOURCES

• COMMITTEE ON EDUCATION AND PUBLIC LIBRARIES (WITH OVERSIGHT OVER THE UNIVERSITY OF GUAM)

## MEMBER

• COMMITTEE ON PUBLIC SAFETY, LAW ENFORCEMENT, AND JUDICIARY

• COMMITTEE ON APPROPRIATIONS, TAXATION, PUBLIC DEBT, BANKING, INSURANCE, RETIREMENT & LAND

• COMMITTEE ON MUNICIPAL AFFAIRS, TOURISM, HOUSING AND RECREATION

• COMMITTEE ON HEALTH AND HUMAN SERVICES, SENIOR CITIZENS, ECONOMIC DEVELOPMENT, AND ELECTION REFORM

• COMMITTEE ON YOUTH, CULTURAL AFFAIRS, PROCUREMENT, GENERAL GOVERNMENT OPERATIONS AND PUBLIC BROADCASTING

July 19, 2012

Capt. Rebecca Heyse, PACAF/PA  
25 E Street, Suite G-108  
Joint Base Pearl Harbor-Hickam,  
Honolulu, HI 96853

ATTN: PACAF Divert Marianas EIS

Dear Captain Heyse:

Thank you very much for this opportunity to comment up the "Draft Environmental Impact Study (DEIS) for Divert Activities and Exercises in Guam and Commonwealth of the Northern Mariana Islands (CNMI)."

The mission is to improve an existing airport and associated infrastructures in the Mariana Islands to achieve divert capabilities in the western Pacific. A divert capability for Andersen Air Force Base is needed in the event access to Andersen AFB or other western Pacific airfields is limited or denied. I applaud the drafters of this DEIS for it being very thorough and comprehensive.

I concur with the proposed actions of either Saipan International Airport in Saipan or Tinian International Airport in Tinian. A. B. Won Pat International Airport in Guam is not considered a feasible alternative location since it is too close to Andersen AFB. If a typhoon impacts on Andersen AFB, it will also impact on the A.B. Won Pat International Airport, only about twelve miles south of Andersen AFB.

H115

Under the proposed actions, "The USAF proposes to construct facilities and infrastructure ...to support a combination of cargo, fighter, and tanker aircraft and associated support personnel for divert landings, periodic exercises, and humanitarian assistance and disaster relief." (DEIS p. ES-5).

I support any program by our military to enhance its presence in the Mariana Islands. The people in Guam and the CNMI are very supportive of our military and very patriotic. In addition, any economic investment in the islands is critically needed at this time. The economy of the CNMI is very weak and any boost will be of major positive economic impact for this community of American citizens.

Capt. Rebecca Heyse, PACAF/PA  
July 19, 2012  
Page Two

The people of the CNMI actually voted in a plebiscite to become American citizens. They had to choose to remain non-American citizens, but they voted on June 17, 1975, (78.8 percent voting "yes") to become Americans. This was the first acquisition of American soil since the 1917 purchase of the Virgin Islands.

At that time, the United States Government stated that it intended to invest economically by developing a harbor area in Saipan and an Air Base in Tinian. The United States, in the political agreement, called (The Commonwealth Covenant) leased the northern two-thirds of Tinian for ninety-nine (99) years for about \$21 Million Dollars. This was supposed to be a fall-back for Clark AFB in the Philippines.

In 1990, when Mount Pinatubo near Clark AFB blew, the Air Force shut down Clark, but did not move those assets to Tinian, but scattered them around the Western States, Hawaii, and Guam. This was the time when the Soviet Union was collapsing and the end of the Cold War was in sight.

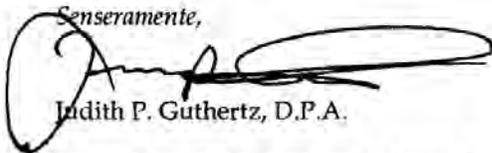
Therefore, the anticipated development of an Air Force base in Tinian with its accompanied harbor facility in Saipan never came about. The United States can rightfully be seen as falling short on its commitments made in the run up to the critical plebiscite in 1975. We welcomed the population into our American political family, but have not reciprocated with the economic development envisioned at the time.

H116

For these reasons, I cheer the USAF desires to invest in the CNMI. I have been in touch with the CNMI Governor's and Tinian Mayor's staffs on this DEIS and have received word from them that any USAF investment will be welcomed, whether it is in Saipan or Tinian.

If all of the technical studies indicate that both Saipan and Tinian are feasible locations, I would then choose Tinian. Additional land would not need to be acquired, and the people there have been waiting patiently for the promised military development of their island. I support the CNMI Governor and the Tinian Mayor and I understand that my recommendation above is their position. They welcome any military investment and presence, anywhere in the CNMI, while favoring Tinian if that location is feasible. If it is not feasible, then they would support Saipan as the choice.

*Senseramente,*



Judith P. Guthertz, D.P.A.

cc: Honorable Benigno R. Fitial, Governor, CNMI  
Honorable Ramon M. Dela Cruz, Mayor, Tinian & Aguiguan  
Mr. Roger M. Natsuhara, Principal Deputy Assistant Secretary of the Navy

Captain Rebecca Heyse, PACAF/PA  
25 E Street, Suite G-I 08  
Joint Base Pearl Harbor-Hickam, HI 96853  
ATTN: PACAF Divert Marianas EIS  
Re: Guam and CNMI Divert Activities and Exercises EIS

Dear Captain Heyse:

I write to comment on the Draft Environmental Impact Statement (EIS) for Divert Activities and Exercises in Guam and the Commonwealth of the Northern Mariana Islands issued by Headquarters, Pacific Air Forces, in June 2012. The EIS examines a Proposed Action to improve existing airport and associated infrastructure to increase operational and divert capabilities in support of expanding mission requirements in the Western Pacific region.

I appreciate the efforts to date of the U.S. Air Force and the Department of Defense to explore all aspects of the Proposed Action and to consider all relevant public comments, especially from those who would be most impacted, the people of Tinian and Saipan. Also, I am grateful that both alternatives for the Proposed Action include improvements to existing airports in the Northern Marianas. This investment would be welcome to the islands' ailing economy and would provide much-needed jobs.

I123

Of the two alternative sites, however, Tinian International Airport should be given preference in my view over Saipan International Airport for the following reasons:

**1. Noise pollution would be less of a factor on Tinian than on Saipan.** There are multiple residential villages adjacent to the Saipan airport that would be heavily impacted by increased noise levels both from the construction and from the subsequent operational activities related to the Proposed Action. These villages include Koblerville, Afetnas, San Vicente, San Antonio, As Lito, and Dandan, all of which have considerable residential populations, schools, recreational areas, and tourist sites.

I122

Increased noise levels at the Tinian airport, on the other hand, would have minimal impact on the residents of Tinian. The closest residential development area is over one and a half miles away. There are no schools, recreational areas, or tourist sites in the vicinity of the airport. All of the land north of the airport is currently leased by the U.S. for military use, and recent training exercises held on Tinian have demonstrated that residential areas south of the airport are exposed to very low noise levels from military construction and aircraft operations there.

**2. The Tinian airport alternative would reduce potential conflicts between commercial and military activities.** The Saipan International Airport is the gateway for the tourist economy of the Northern Marianas. There were in 2011 an average of 140 aircraft operations daily at the Saipan airport, including jet, single engine, and turbo prop international and inter-island flights. By contrast, there were 113 aircraft operations daily on average at Tinian airport in 2011, but these all involved small, single-engine aircraft and no international flights. So the Tinian Airport has greater capacity for the proposed increased use by the military.

I117

In addition, it has been demonstrated that military use can disrupt the commercial flights at Saipan Airport, which are essential to the overall economy of the islands. On February 21, 2012, an Air Force F-16 Falcon made an emergency landing at Saipan International Airport. This single incident

forced the runway to be shut down for 18 hours, causing delays and cancellations of domestic and international flights to the detriment of tourist travel. The Proposed Action estimates eight weeks per year of joint military exercises and divert and humanitarian airlift staging training, so the potential for disruption of commercial activities at the Saipan Airport would be significant. The Tinian alternative would reduce this potential for conflict and avoid detriment to the flight-dependent tourist economy, as well as loss of revenues to the Commonwealth Ports Authority from decreased landing and other fees from an interruption in commercial flights.

I117

**3. Tinian airport's runway could more easily be expanded to the requisite length.** The Proposed Action would require that the Saipan airport runway be extended from the current 8,700 feet length to 10,075 feet. This would require that additional land be leased from the government of the Northern Mariana Islands at a cost to the Department of Defense. This Saipan extension would also require prior approval by the Federal Aviation Administration for a non-standard runway.

I118

By contrast, expansion of Tinian's airport runway from its current 8,600 feet to a requisite 10,000 feet would not require that additional land be leased from the local government. Rather the additional land needed for the runway extension is in the area already leased and paid for by the U.S.

**4. Adverse impacts on the endangered nightingale reed-warbler could be expected on Saipan.** Areas surrounding the Saipan airport have been identified as critical habitat for the nightingale reed-warbler, a species listed as endangered under the Endangered Species Act. The three years of construction activities that the Saipan alternative would require, as well as the subsequent implementation of the divert operations and annual eight-week training, are likely to have an adverse impact on that habitat and require mitigation measures.

I121

With the Tinian alternative, no threatened or endangered species are anticipated to be significantly affected in either the construction or the implementation phase. Therefore, no mitigation efforts are likely to be needed on Tinian and these costs can be avoided.

**5. Development of the Tinian alternative could have synergistic benefit for other military activities on Tinian.** A number of joint, combined, and unit-level military training activities and exercises, described and analyzed in the Mariana Islands Range Complex EIS and subsequent Record of Decision, are scheduled for Tinian. Four live firing ranges are to be constructed there. These activities would benefit from renovation of the Tinian harbor to allow for safe, efficient, and reliable transportation of equipment, fuel, and military personnel. Developing the Tinian alternative for divert activities and exercises would strengthen the rationale for investment in harbor renovation and make Tinian an even more attractive location for joint-service and joint international training exercises.

I120

**6. Tinian has the necessary lodging options to support temporary personnel.** Billeting for up to 700 personnel is required to support aircraft operations during a divert landing, humanitarian airlift, or military exercise event. The under-utilized Tinian Dynasty Hotel and Casino has 412 rooms capable of housing 824 temporary support personnel. Tinian also has several smaller scale hotels. While there are fewer commercial lodging options in total than on Saipan, there is sufficient capacity on Tinian; and the cost and concentration of these facilities may make Tinian a preferable alternative from the point of view of billeting.

I119

The people of the Northern Mariana Islands will benefit from and welcome the development of either the Saipan or Tinian alternative for the divert capabilities, humanitarian airlift, and training exercises proposed in the Draft Environmental Impact Statement. For the reasons I have stated, however, the

Tinian alternative offers a number of advantages, which I ask be given full consideration in development of the Final EIS and, ultimately, the Record of Decision.

Thank you for your consideration of my comments. Please feel free to contact me with any questions or concerns.

Sincerely,

GREGORIO KILILI CAMACHO SABLAN  
Member of Congress

7-3-12, 2012

Comments on Draft Environmental Impact Statement for Divert Activities and Exercises, Guam and the Commonwealth of the Northern Mariana Islands, Tinian Joint Leadership.

First and foremost, in the spirit of Governor Fitial's Military Integrated Management Council, we wish to state that the establishment of an Air Force Divert Base in the CNMI is a welcome addition to the economy of the Commonwealth of the Northern Mariana Islands, whether it is constructed on Saipan where an additional 40-some acres of land would have to be leased from the Commonwealth and provide only 87% operational resiliency to the United States Air Force, or on Tinian where military leased lands are already available at no additional cost to the United States of America and where the Air Force can obtain 100% of its operational resiliency in case of need. Pointedly, we are in full support of the constructing the Divert Base in the Commonwealth of the Northern Mariana Islands.

J126

However, the United States Congress and higher echelon United States Air Force decision makers should be aware that the draft EIS for a Divert Base in the Northern Mariana Islands is flawed both fundamentally and technically with regard to the Tinian option. There are significant costs that have not been clearly identified in either the EIS or the Executive Summary, and there are significant recent capital improvement developments on Tinian that have not been identified.

J125

Fundamentally, the EIS fails to recognize either the letter or the spirit of the Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America, codified at 48 U.S.C. § 1801, despite comments to this effect made in the first scoping meeting held on Tinian. The history of the Covenant and its impact on economic development in the CNMI is mentioned (Sec. 3-pps 97-100), but fails to discuss the impact of Section 803 of the Covenant on the use of CNMI Leased Lands. The term Covenant does not even appear in the index to the EIS (Sec. 8-p6), and the relevant sections are not reproduced in the appendix for the information of high level decision makers.

Section 803 of the Covenant provides for the joint use of Tinian Harbor and Tinian West Field International Airport. When developed in the early 1970s, it provided sufficient land for ground, sea and air training exercises to support air training and maneuvers, and an ammunition storage area. To this date, these lands have not been utilized and remain available to the Department of Defense. Operations on Tinian, therefore, are free to the military services, whereas they will have to pay to land aircraft at Saipan.

The EIS did not give sufficient importance to the transportation of ammunition from Tanapag Harbor in northern Saipan to Saipan International Airport on the very southern end of Saipan. Bombs would have to be transported through the heavily populated commercial and residential

J139

districts of western Saipan before reaching the airport. On the other hand, transporting ammunition from Tinian Harbor to West Field International Airport would pass through a very lightly populated area to nearby West Field at a much shorter distance approximately 1.5 miles.

J139

Most important, Section 806 (a) of the Covenant provides that the United States will continue to recognize and respect the scarcity and special importance of land in the Northern Marianas. If the United States must acquire any interest in real property which it does not obtain under the Covenant, the United States will only seek to acquire such land if the public enterprise cannot be accomplished with a lesser interest. The lesser interest, in this case, would be taking advantage of the lands already under lease on Tinian. Essentially, this precludes the lease of additional lands on Saipan for a purpose that can be fulfilled on Tinian leased lands.

J127

The Covenant is also said to be the general United States policy with respect to land acquisition in the Northern Mariana Islands. It provides significant protections against the arbitrary or improper use of the authority of the United States to acquire property in the Commonwealth. This is especially so in view of the fact that Subsection (b) provides that no interest in real property will be acquired by the United States unless the acquisition has been duly authorized by the Congress and appropriations are available to pay the landowner just compensation. It is difficult to speculate on the cost of a long-term lease on 40 acres of prime land at Saipan International Airport, however, it would certainly be in the millions of dollars – far more than the cost of repairs to the breakwater at Tinian Harbor, for instance.

J128

It is surprising that top priority in identifying the appropriate first alternative was not giving the United States Air Force the maximum long-term capability to "establish additional divert capabilities to support and conduct current, emerging, and future training activities, while ensure the capability to meet mission requirements in the event that access to Andersen Air Force Base (AFB) or other western Pacific locations is limited or denied (Cover Sheet to Draft EIS). Utilizing existing Tinian Leased Lands can give the United States Air Force 100% resiliency in case access to Andersen Air Force Base is limited or denied. Even by leasing additional land on Saipan, the United States Air Force would automatically lose 17% operational resiliency. The runway at Tinian's West Field International Airport could easily be extended to provide the runway necessary to accommodate the largest cargo and aerial refueling aircraft in the Air Force inventory. Even at great expense to the American tax payer, this goal could not be achieved on Saipan.

J130

The draft Air Force EIS also flies in the face of the Congressional mandate to streamline the DoD by establishing inter-service operations. This September there will be a joint Army-Navy training operation on North Field. At about the same time the III MEF will conduct a joint Navy-Marine Corps training operation on North Field. Most significantly, the recent Marine Air Group - 12 exercise on both West Field, establishing restraining wires for F-18 hot refueling operations, and on North Field, establishing an expeditionary air field, demonstrated the island's ability to support major air operations. Despite all this joint inter-service activity on the part of the Army, Navy and Marine Corps, the Air Force-created draft EIS for a Divert Base purports to

J133

separate Air Force operations from the other services currently taking advantage of the joint-use opportunities available on existing Tinian leased lands.

J133

Technically, the draft EIS is out of date. It fails to take into account several developments on Tinian in the last 2 years. The Record of Decision issued by the US Marine Corps in September 2010 created live fire rifle ranges on Tinian, primarily for the use of the US Marine Corps, yet available to all other federal agencies with a need to maintain small arms certification.

Furthermore, Tinian was visited by high ranking representatives of the Japanese Self-Defense Force (JSDF), which co-funded the recent MAG -12 operations on Tinian. They are now considering joint USMC-JSDF training exercises on Tinian. Having a fully operational air base on Tinian with refueling capabilities will support the Marine Corps effort on Tinian, as well as joint training operations with other US and JSDF teams.

J134

[Although it is true that Saipan has more high-end hotels than Tinian, the Tinian Dynasty Hotel and Casino has 412 rooms with a total capacity of well over 824, more than enough to support the personnel recommended in the EIS.] Furthermore, if the Divert Base is constructed on Tinian, the refueling system would make the airport fully capable of receiving foreign jet aircraft. This would undoubtedly stimulate investors who have already purchased casino licenses to begin construction on their hotel complex.]

J131

J138

Just this month, Matua Bay Resort broke ground on a new golf course to be located along beautiful Nassarino Beach on Southwestern coast of Tinian.

The draft EIS goes to lengths to discuss the "dilapidated" condition of the Tinian Harbor and the Tinian Dump. Currently, the fuel dock at Tinian Harbor is receiving extensive repairs, including a new sea wall, bollards and fenders. Recently, the Tinian joint leadership has concluded negotiations with the CPA and OIA to repair the two finger piers at the dock. This expenditure of CNMI CIP funds will undoubtedly lead to funding to repair the Breakwater.

J132

New equipment is being purchased to maintain the existing Tinian Dump, and design work is already at 30% completion for a new solid waste transfer station and a new landfill. Together, they will be more than adequate to handle all solid and liquid wastes produced by the Divert Base.

On Tinian, there are no endangered species within the proposed divert base area that would require mitigation, whereas construction in Saipan would likely necessitate a \$600,000 deposit in the mitigation bank.

J135

The population of Tinian is not 5,000 people, as stated in the EIS. It is barely 3,000. Utilizing Tinian for the planned 8 weeks per year for training exercises will interfere less with local air traffic control than on Saipan, cause less effective noise pollution for the local community, and, because of the Covenant, the Air Force will not have to pay landing fees on Tinian. During the recent MAG - 12 operations at West Field International Airport, F-18 Hornets practiced rotating

J136

hot-refueling operations throughout the day for a full week with no appreciable distress to the community. Landing KC-135s as well as fighter jets at Saipan International Airport would cause considerable distress to the local population, and particularly to Kobler Elementary School, San Antonio Elementary School, San Vicente Elementary School and Southern High School, all of which are in the flight pattern.

J136

Furthermore, as noted in the draft EIS, while the construction of the Divert Base on Saipan will be of relatively minor importance to that economy, utilizing Tinian will provide a significant stimulus to the general economic development of this underdeveloped island, therefore decreasing the need for federal subsidies; building the Divert Base on Tinian will mean the completion of the West Field International Airport and the arrival of international commercial aircraft, allowing not only the importation of tourists, but the export of fresh and frozen produce and meats; completion of the Divert Base will stimulate the Army, Army Reserve, National Guard, Navy, and its Marine Corps, to take better advantage of training opportunities on Tinian.

J137

Finally, and most important to the people of Tinian, building the Divert Base on Tinian will begin to fulfill a 37-year-old pledge to the people of Tinian. Before the 1975 plebiscite to ratify the Covenant, representatives of the United States of America, both military and civilian, led the people of Tinian to believe that if they voted in favor of the Covenant -- including the technical agreement to lease two-thirds of their island for a hundred years -- the United States would build a large multi-service training base on Tinian and the people of Tinian would benefit from the economic development. Other than for a few scattered training exercises, no significant military development has occurred on Tinian. No permanent military facilities have been built. The port of Tinian, built by Navy Seabees during World War II has been neglected, as have the access roads on the military leased lands. Building the Divert Base on Tinian will begin to allay the concerns of some Tinian residents who are now questioning the wisdom of their 1975 decision.

J129

We encourage you to re-think the real purpose behind the construction of the Divert Base and recognize that utilizing the existing military land lease on Tinian gives the United States Air Force the best opportunity to fulfill its mission, now and in the future.

J124



Commonwealth of the Northern Mariana Islands  
**OFFICE OF THE GOVERNOR**  
**Division of Environmental Quality**

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July 11, 2012

Capt. Kimberly Bender, PACAF/PA  
25 E Street, Suite G-108  
Joint Base Pearl Harbor-  
Hickam, HI 96853  
ATTN: PACAF Divert Marianas EIS

**Subject: Environmental Impact Statement for Divert Activities and Exercises**

Dear Captain Bender:

On June 23, 2012, DEQ attended the public hearing for the proposed divert activities and received a copy of the Draft Environmental Impact Statement ("EIS") for the project. Based on the information obtained at the public hearing and our review of the draft EIS, we have no significant concerns about the project at this time and believe the EIS to be sufficient.

} K139

Thank you for the opportunity to comment on this proposal.

Sincerely,

David B. Rosario  
Acting Director, Division of Environmental Quality

Lawrence Duponcheel

If Tinian is selected as the site for the alternate Airfield, a good number of cattle ranches (ranching families) will be affected. The people of Tinian rely on these ranches as the one and only source of fresh meats and sometimes produce for family consumption. Our ranches provide work, income, and food security for island residents. That being said, any plans for expanding the airstrips or boundaries of any type that might affect these ranches should provide consideration and support where appropriate. If at all possible, grazing areas should be incorporated into the planned facility, just as they are on other bases which allow farming and ranching within their limits. Thank you...Law

} L140



**COMMONWEALTH PORTS AUTHORITY**

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P.O. BOX 501055, SAIPAN, MP 96950-1055  
Phone: (670) 237-6500/1 • Fax: (670) 234-5962  
E-mail Address: cpa.admin@pticom.com  
Website: www.cpa.gov.mp

**Official Comments and Position on the**

**DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR**

**DIVERT ACTIVITIES AND EXERCISES**

**GUAM AND**

**COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS**

**Edward M. Deleon Guerrero**  
**Executive Director**  
**July 23, 2012**

*SAIPAN INTERNATIONAL AIRPORT/SEAPORT*  
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*ROTA INTERNATIONAL AIRPORT/SEAPORT*  
*P.O. BOX 561, Rota, MP 96951*

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*P.O. BOX 235, Tinian, MP 96952*

**BACKGROUND**

The Commonwealth Ports Authority (CPA) was created in 1981 by CNMI Public Law 2-48 and is tasked with managing and operating all the airports and seaports throughout the Northern Marianas. CPA affairs are governed by a seven-member Board of Directors appointed by the Governor, with the advice and consent of the Senate of the Commonwealth Legislature. The Board appoints the Executive Director to carry out the goals and objectives of the Authority and to oversee its day-to-day operations and management.

The Saipan International Airport is a 1,400 acre facility, serving the aviation needs of Saipan and the CNMI. Saipan International Airport (SIA) is contained in the U.S. National Plan of Integrated Airport Systems and is classified as a Primary/Small Hub airport as defined by FAA. The SIA runway, designated as 7/25, is of asphalt construction and is 8,700 feet long and 200 feet wide.

The Tinian International Airport (TIA) is an FAA certified facility which accommodates single engine aircrafts and Shorts 360 aircrafts with 36 passenger capacity. The Tinian runway is 8,600 feet in length and 150 feet wide with a parallel taxiway and two connecting taxiways at each runway end.

The CNMI is located relatively close to Asia. Saipan is approximately 1,300 nautical miles south of Tokyo, Japan, 1,800 miles east of Hong Kong and 1,500 miles east of Taiwan and Manila. Due to its close proximity to Asian markets, tourism is the leading economic sector in the CNMI.

**STATEMENT OF SUPPORT**

CPA supports Pacific Air Force (PACAF)'s mission to provide ready air and space power to promote U.S. interests in the Asia Pacific Region. Specifically, CPA supports the establishment of an Air Force Divert Base on the island of Tinian. CPA understands that PACAF's first preference for divert activities and exercises is Saipan. However, CPA agrees with CNMI Governor Benigno R. Fitial and Tinian Mayor Ramon M. Dela Cruz that any divert activities in the CNMI should be located on Tinian.

N174

CPA's comments are meant to constructively point out possible consequences caused by PACAF's proposed action in this draft environmental impact statement and to offer solutions in the process. CPA trusts that its comments and concerns will be taken into consideration.

*The Best Alternative: Alternative 2 TNI*

While CPA recognizes that the CNMI will continue to play a critically important role in U.S. military efforts in the Asia Pacific region, we must remind you that the Divert Activities and Exercise program as proposed, with its first alternative being Saipan and its second alternative being Tinian, will impact our environment and create a myriad of financial, social, and cultural burdens for the people of the Commonwealth. CPA understands that there are possible mitigation proposals to deal with the various impacts, including best management practices and

N170

design concepts to avoid adverse impacts. However those specific measures have not been identified in the DEIS. N170

CPA is mindful that the proposed action will not only consist of Air Force Divert Landings and Exercises and humanitarian airlift staging, but will also consist of joint military exercises with U.S. Navy, U.S. Marine Corps, and military from other countries to meet U.S. national security interests. CPA wants to ensure that any negative socio-economic impacts associated with the proposed action are at a minimum mitigated through federal efforts or in the alternative outweighed by the economic benefits the proposed action will bring to the CNMI. Therefore, given the potential impacts the proposed action will have on the CNMI as a whole, CPA recommends that Alternative 2 TNI be selected as we feel that Tinian is the best alternative for all stakeholders. N172

CPA makes the following comments:

A. Impact of Cultural Resources at GSN and TNI

The Saipan International Airport sits on what was once Aslito/Isley Field and is designated as a historic landmark under the National Park Service. Along with the air fields, there are several Japanese bunkers, buildings and other structures that were eventually used by U.S. forces during World War II. The historic and cultural significance of the former Aslito/Isley Field and its surrounding buildings and structures is profound. In the nine month period between November 1944 and Japan's unconditional surrender in August 1945, Army Air Force B-29s conducted long-range raids against Japanese industrial and urban targets from Saipan thereby contributing to the eventual end of World War II. Section 5.3.8.1 specifically states that the historic structures are susceptible to secondary impacts from vibrating related deterioration due to heavy aircraft traffic at the parking aprons and increased vehicle traffic and personnel presence. CPA is understandably concerned that the proposed action will threaten the historic and cultural resources at Aslito/Isley Field. Moreover, it is unclear what mitigation efforts would be used by PACAF to minimize any potential deterioration of such resources. N173

Although there will be potential cumulative impacts on Tinian historic and cultural sites as a result of the proposed action, those sites are not located on TNI. Therefore, there would be less of a burden on Tinian historic/cultural sites than to GSN which sits on an actual historical landmark.

B. Impact of Noise Environment at GSN and TNI

Although the DEIS distinguishes between three possible noise level scenarios (Low, Medium and High), CPA feels that any scenario will negatively affect the noise environment of Saipan thereby affecting its residents, visitors, and CPA employees. CPA therefore feels it is prudent to comment on the High Scenario. Under the High Scenario, periodic, direct, moderate to major, adverse impacts on the noise environment would be expected (page 4-9). The DEIS estimates that there would be four operations per day for N171

twelve F-16 and F-22 aircrafts. This would total to 48 operations per day. Although the DEIS states that the Divert Activity and Exercises would only be for 8 weeks and the majority of the operations would be completed from 7:00 a.m. to 10 p.m., such operation would still severely impact Saipan's noise environment. Even though a majority of the operation would be conducted before 10:00 p.m., thirty percent of the operation would still be conducted from 10:00 p.m. to 7:00 a.m. All totaled, Saipan residents and visitors would have to endure fourteen F-16 and F-22 operations from 10:00 p.m. and 7:00 a.m.

Saipan's main industry is tourism. Tourists flock to Saipan to enjoy its clean beaches and peaceful environment. Surrounding tourist facilities include Coral Ocean Point and Lao Loa Bay Resort. It is CPA's position that both resorts will inevitably be negatively impacted by the high noise level resulting from the proposed action. Moreover, residents in surrounding residential areas such as Dandan, Koblerville, Aslito and Kagman will also be victims of the high level of noise. It is important to note that the first three aforementioned areas are all within the High Scenario Noise Contours at GSN. See Figure 4.1-3, page 4-11.

Alternatively, TNI is located away from the concentrated populations of San Jose Village, Marpo Heights, and Carolinas Heights. Noise impact will be concentrated on the northern end of Tinian, away from the main residential areas. CPA believes that there should nonetheless be noise mitigation. This could be accomplished by requiring that all aircrafts approaching TNI avoid flying over San Jose Village.

#### C. Availability of Land on Tinian

Section 803 of the Covenant provides for joint use of the Tinian International Airport. To date, the U.S. Armed Forces have failed to fully utilize TNI to its fullest potential. Section 2.2.1 states that selection standards required for the airfield must include existing land and infrastructure with expansion capabilities and it must be located within the MIRC training area. Tinian fits that bill. Although there is no current fuel farm located on Tinian, any added cost of constructing a fuel farm on Tinian will be outweighed by the benefit of concentrating all proposed military activities on Tinian as there is sufficient land to accomplish its goals and objectives in Tinian.

#### D. Airspace Surrounding GSN and TNI

Private charter and commercial aircrafts regularly fly in and out of GSN. CPA is concerned that the establishment of a divert airbase at GSN will impede commercial aircrafts into GSN thereby negatively affecting the CNMI economy. The DEIS also does not offer information on any mitigation to such airspace during the monthly training schedules. Therefore it would be more beneficial to PACAF and the CNMI to limit the proposed action to Tinian.

Even if TNI is selected as the alternative site, PACAF should nonetheless be mindful of the air taxi services between TNI and GSN. There are approximately 150 air taxi flights per day. CPA would request that any proposed activity conducted at TNI be

N171

N169

accomplished with minimal disruption to the on-going air taxi service between TNI and GSN. Moreover, although TNI operates without an air control tower, all pilots approaching and departing Tinian do maintain contact with the FAA control tower in Saipan. It is imperative that PACAF provide approach and departure information to the GSN ATC when conducting exercises at TNI.

E. PACAF must work closely with FAA

Given the several requirements for the set-up of the runway, lightings, markings, munitions, etc., it is extremely important that PACAF work closely with FAA to ensure compliance with all FAA rules and regulations. PACAF must know that any attempt to alter or replace any mechanism at GSN or TNI will require FAA approval.

N175

In conclusion, CPA believes that there will be negative socio economic impacts associated with the proposed action and recommends that PACAF establish a divert air base on Tinian. CPA respectfully requests PACAF to seriously consider all the DEIS comments made herein and from other public officials in the CNMI.



EDWARD M. DELEON GUERRERO

UNITED STATES AIR FORCE DIVERT ACTIVITIES AND  
EXERCISE ENVIRONMENTAL IMPACT STATEMENT  
PUBLIC HEARING

---

SAIPAN

Susupe, Saipan

June 25, 2012

PREPARED BY: GEORGE B. CASTRO  
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**UNITED STATES AIR FORCE DIVERT ACTIVITIES AND  
EXERCISE ENVIRONMENTAL IMPACT STATEMENT  
PUBLIC HEARING**

Public hearing on the United States Air Force Divert Activities and Exercise Environmental Impact Statement, was taken on Tuesday, June 25, 2012, on the island of Saipan, before an Officer of Depo Resources.

**WELCOMING & INSTRUCTIONS**

COLONEL BILL ORR ..... p. 4

**EIS BRIEFINGS**

MAJOR PETER TOVES ..... p. 8

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**PUBLIC COMMENTS**

BY MR. ROSIKY CAMACHO ..... p. 19  
BY RUTH TIGHE ..... p. 26  
BY MS. TERESA ARRIOLA ..... p. 27  
BY MR. JAMES ARRIOLA ..... p. 29  
BY MR. ROSIKY CAMACHO ..... p. 29

(End Public Comments)

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1 SUSUPE, SAIPAN: TUESDAY, JUNE 25, 2012, 7:00 P.M.

2

3 UNITED STATES AIR FORCE DIVERT ACTIVITIES AND

4 EXERCISE ENVIRONMENTAL IMPACT STATEMENT

5 PUBLIC HEARING

6

7 COLONEL ORR: I want to begin by  
8 thanking you all for coming out tonight in this  
9 public hearing for the United States Air Force  
10 Divert Activities and Exercises Environmental  
11 Impact Statement, which is called or refer to  
12 as the EIS.

13 I am Colonel Bill Orr and I am the  
14 Chief Judge of the United States Air Force  
15 Court of Criminal Appeal. I normally preside  
16 over the appeal of the military members who are  
17 tried in a trial by a court martial. However,  
18 tonight I've been requested to preside over  
19 these hearings to support the public review and  
20 involvement process.

21 I do not work for anyone in the Pacific  
22 Air Forces, which is the major command  
23 responsible for the proposed action. I'm not  
24 involved in any way in the development of this  
25 Draft EIS, and I don't act as a legal adviser

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1 to the Air Force representative working on this  
2 proposal. In other words, I will not make any  
3 recommendations or decision on whether which  
4 EIS or how this EIS should -- whether the  
5 proposal should be continued, modified, or  
6 abandoned or how this EIS should be prepared.

7 My role in this hearing tonight is  
8 simply to act as an impartial moderator and to  
9 ensure that we have a fair, orderly, and  
10 impartial hearing, and where you have the  
11 opportunity to make comments on the proposal.  
12 We're here tonight because the Air Force is  
13 analyzing the environmental impact of the  
14 proposed divert activities and exercises.

15 This hearing is held in accordance with  
16 the provisions of the National Environmental  
17 Policy Act & Regulations published by the  
18 Council of Environmental Quality and the Air  
19 Force.

20 The purpose of this hearing is to  
21 receive your comments on the Draft EIS. But  
22 tonight's hearing is just one of several  
23 opportunities for public comment. Please keep  
24 in mind that this hearing is not a debate and  
25 it's not a vote on the Draft EIS; and it's not

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1 a question and answer session. The hearing is  
2 an opportunity we give, to express your views  
3 and concerns about the adequacy of the  
4 environmental analysis and the potential  
5 environmental impact associated with the  
6 proposal.

7 Comments about other unrelated issues  
8 won't assist in the decision-making process.  
9 If you'd like to make a comment during the  
10 hearing, please put your name on the sign-up  
11 sheet and submit your comments, on the comments  
12 section.

13 During the first part of the hearing,  
14 Air Force representatives will provide you with  
15 information on the divert activities and  
16 exercise EIS as well as the description of the  
17 project in the environmental impact analysis  
18 process.

19 We will have representatives involved  
20 in the project from Headquarters Pacific Air  
21 Forces, Joint Base, Pearl Harbor, Hickam, in  
22 Hawaii. We have Major Chief Peter Toves and  
23 Colonel Dwayne Thomas, Mission Support Group  
24 Commander here, from Andersen Air Force Base,  
25 and they will be representing the point of

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1 view.

2 Individual representatives from Pacific  
3 Air Force tonight are Ms. Carol -- Mr. Mark  
4 Peterson, and Mr. --. Transcribing this  
5 hearing tonight is Ms. Sullivan.

6 To begin this night's hearing, we will  
7 hear from Major Toves who will give you a  
8 briefing on the proposed action and the  
9 alternatives. He will also preside with the  
10 overview of the National Environmental Policy  
11 Act which you here refer to as NEPA. And he  
12 will summarize the potential environmental  
13 consequences of the proposal.

14 After the presentation, I will open up  
15 the floor for your comments if you would like  
16 to make a statement on the record here tonight.  
17 Your comments will provide the decision-makers  
18 for the divert activities and exercise proposal  
19 the benefit of your knowledge in the local area  
20 and your concerns about the environmental  
21 analysis.

22 If you would like to provide written  
23 comments rather than speak here tonight, or if  
24 you'd like to do both, written comments sheets  
25 are available at the how-to submit comments

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1 table. You can hand your comments in tonight  
2 at the table after the hearing or you can mail  
3 them in later. You can also provide comments  
4 on the project website or by leaving a message  
5 on the project voicemail. If you mail your  
6 comments, please send them to the address  
7 printed on the facts sheets in comment forms.  
8 The Air Force will consider comments received  
9 throughout the Environmental Impact Analysis  
10 process. But to make sure your comments are  
11 considered and documented in the final EIS,  
12 please submit your comments by July 23<sup>rd</sup>, 2012.

13 I'll now go ahead and move in to the  
14 briefings by Pacific Air Force. During the  
15 briefings, if it looks like we are reading to  
16 you, it's because we are. I apologize for  
17 that; but the briefings are written out to make  
18 sure that each speaker covers all the  
19 information for that.

20 Now, I'll turn the mic over to Major  
21 Toves. He'll give you the briefing at this  
22 time.

23  
24 ENVIRONMENTAL IMPACT STATEMENT BRIEFINGS  
25

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1 MAJOR TOVES: Good evening everyone.  
2 The following topics will be discussed during  
3 this brief presentation to familiarize you with  
4 the Air Force and proposed action in the EIS.  
5 Following this presentation, we will have the  
6 public hearing portion of this meeting where  
7 you'd be able to make verbal comments on the  
8 EIS.

9 Pacific Air Force's primary mission is  
10 to provide ready air and space power to promote  
11 U.S. interests in the Asia Pacific region  
12 during peacetime through crisis and in war.  
13 The Pacific Air Force's area of responsibility  
14 extends from the west coast of the United  
15 States to the east coast of Africa, and from  
16 the Arctic to the Antarctic, more than  
17 100,000,000 million square miles. This project  
18 is intended to support overall PACAF mission by  
19 developing a divert airfield in the Marianas  
20 region. Next slide.

21 Under existing capabilities, there's no  
22 divert or contingency airfield on U.S.  
23 territory or in the western pacific that is  
24 designed and designated to provide strategic  
25 operational and exercise capabilities for U.S.

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1 Forces when needed in humanitarian airlift and  
2 disaster relief in times of natural or man-made  
3 disasters.

4           The purpose of the proposed action is  
5 to establish additional divert capabilities to  
6 conduct divert landings in support of current  
7 emerging and future exercises on ensuring the  
8 capability to meet mission requirements in the  
9 event that access to Andersen Air Force Base or  
10 other western pacific locations is limited or  
11 denied.       For example, during the 2011  
12 earthquake and tsunami in Japan, the need for  
13 disaster response and humanitarian assistance  
14 arose suddenly without warning. If this had  
15 occurred during scheduled training exercises at  
16 Andersen Air Force Base, in either training or  
17 response efforts, might have been delayed or  
18 impeded.

19           Additionally, similar natural or man-  
20 made disasters could also impact Andersen Air  
21 Force Base's missions requiring reliance on the  
22 alternate design and designated divert  
23 airfield.       Specifically, there are four  
24 operational requirements that are necessary to  
25 successfully support the PACAF mission driving

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1 a need for a divert airfield in the Marianas.  
2 They are: ensure airfield accessibility and  
3 access to Andersen Air Force Base or other  
4 western pacific airfields is limited or denied,  
5 provide for contingency operations to include  
6 humanitarian relief efforts, accommodate future  
7 increases in operational tempo and associated  
8 training and achieve and sustain readiness.  
9 Next slide.

10 For the purposes of this EIS, the study  
11 area includes the Marianas region, existing  
12 seaports and surrounding areas including  
13 easements or routes needed to transport  
14 petroleum products. Because of the proximity  
15 to four deployed forces in the western pacific,  
16 Marianas provides the best economic alternative  
17 for deployed U.S. Forces to train on U.S. lands  
18 and to develop the proposed additional  
19 capabilities. Next slide.

20 The proposed action analyzed in the EIS  
21 is to develop critical enhancements to existing  
22 airport or airfield and associated  
23 infrastructure in the Marianas to increase  
24 operational and divert capabilities needed by  
25 the U.S. Air Force especially humanitarian

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1 relief in disaster and joint exercises.

2           The design for the proposed action is  
3 based on a twelve KC-135's which is a wide-body  
4 tanker aircraft. However, the divert airfield  
5 could support any combination of cargo and  
6 fighter, tanker and other aircraft. The  
7 combination of plane types will not exceed the  
8 capabilities of the airport design under the  
9 proposed action. The 700 support personnel  
10 would accompany the squadron and tanker  
11 aircraft. Next slide.

12           Specific components of the proposed  
13 action include improving or constructing  
14 airfield operational infrastructure which  
15 includes an expanded runway area, parking  
16 apron, associated pavement markings, lighting,  
17 security, and other related infrastructure,  
18 temporary munitions storage area, as is cargo  
19 pad and arm/disarm pad, aircraft hanger,  
20 maintenance facility, and jet refuel receiving  
21 storage and delivery capability.

22           These improvements are considered  
23 construction phase of the proposed action.  
24 Implementation phase of the proposed action  
25 will utilize an infrastructure improved and

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1 developed during the construction phase.  
2 Elements of the implementation phase include  
3 unplanned emergency landings if the locations  
4 in the western pacific are unavailable for  
5 landing; periodic joint and unit level military  
6 exercises, humanitarian airlift staging in the  
7 event of an emergency or disaster, and ability  
8 to support up to 700 temporary personnel during  
9 any of the events just described. Next slide.

10 To meet the purpose and need to  
11 establish additional divert capabilities; the  
12 divert activities and exercises, Draft EIS  
13 analyzes two alternatives. For those of you  
14 who participated in the public scoping, you may  
15 remember we originally discussed three  
16 alternatives. In response to public scoping  
17 and after further evaluation of potential  
18 alternatives, the Air Force has analyzed two of  
19 the original three alternatives in the proposed  
20 action.

21 The development and specifications that  
22 require facilities and infrastructure varies  
23 depending on the existing conditions at each  
24 alternative location. Saipan International  
25 Airport and Tinian International Airport are

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1 being considered as potential alternative  
2 locations for airfield improvements.

3           The Draft EIS also includes a no-action  
4 alternative under which the U.S. Air Force  
5 would not develop or construct facilities and  
6 infrastructure at an existing airport or  
7 airports, and PACAF'S ability to achieve and  
8 maintain military readiness or remain as is.  
9 For purposes of this EIS, the no-action  
10 alternative serves as the baseline level of  
11 current facilities in operations. As we  
12 discuss the alternative, please remember this  
13 is a no-change alternative. The purpose of  
14 including a no-action alternative in the  
15 Environmental Impact Analysis is to ensure that  
16 agencies compare the potential impacts of the  
17 proposed major federal action to the known  
18 impacts of maintaining existing conditions.  
19 Next slide.

20           The Saipan alternative is the preferred  
21 alternative of the EIS because the analysis  
22 shows it's more consistent with U.S. Air Force  
23 operational requirements. Under the Saipan  
24 alternative, the U.S. Air Force will develop  
25 and construct facilities and infrastructure at

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1 Francisco C. Ada Saipan International Airport  
2 consistent with the facilities and  
3 infrastructure described under the proposed  
4 action.

5 The improved facilities and  
6 infrastructure would support a combination of  
7 cargo, fighter, and tanker aircraft, and  
8 associated support personnel for periodic  
9 exercises, unplanned divert landings,  
10 humanitarian assistance, disaster relief in the  
11 western pacific. Next slide.

12 Under the Saipan alternative, the U.S.  
13 Air Force would also construct a two-boat  
14 floating storage tanks at the Saipan Harbor to  
15 store fuel and aircraft operations. Next  
16 slide.

17 Under the Tinian alternative, the U.S.  
18 Air Force will develop and construct facilities  
19 and infrastructure at Tinian International  
20 Airport, also known as West Tinian Airport,  
21 consistent with the facilities and  
22 infrastructure described under the proposed  
23 action.

24 The improved facilities and  
25 infrastructure will support a combination of

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1 cargo, fighter, and tanker aircraft, and  
2 associated support personnel for periodic  
3 exercises, unplanned divert landings, and  
4 humanitarian assistance and disaster relief in  
5 the western pacific. Tanker aircraft are the  
6 more likely used in the immediate future. Next  
7 slide.

8 Under the Tinian alternative, U.S. Air  
9 Force would also construct a boat fuel storage  
10 tank at the Tinian Harbor to store fuel for  
11 aircraft operations. Next slide.

12 The analysis of the EIS indicates that  
13 there are only a few environmental resources or  
14 subjects that could potentially experience  
15 major adverse impacts as a result of the  
16 implementation of the proposed action. These  
17 resources and subjects include noise, water  
18 resources, biological resources, cultural  
19 resources, and minority and low-income  
20 populations. Next slide.

21 Potential mitigation. In the  
22 development of the final EIS, U.S. Air Force  
23 will identify best management practices,  
24 mitigation measures, and design concepts that  
25 could help avoid any of these major adverse

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1 impacts to the extent practicable. U.S. Air  
2 Force is committed to the unique environment,  
3 culture, and people of the Mariana Islands and  
4 would continue to conduct several environmental  
5 stewardship programs to protect the environment  
6 of the Mariana Islands. Next slide.

7 Rules of the EIS. What we've given you  
8 is just a very brief summary of the Draft EIS  
9 and a listing of the associated impact areas  
10 and a description of mitigation. The  
11 development of management actions and  
12 mitigations is an ongoing process. And our  
13 primary reason for being here tonight is to  
14 record your concerns and allow us to continue  
15 developing these actions.

16 I emphasize the fact that this is only  
17 a draft document at this time. And we need  
18 your assistance to continue refining the  
19 material. The Draft EIS was prepared by the  
20 U.S. Air Force to comply with the National  
21 Environmental Policy Act or NEPA.

22 The Draft EIS represents compliance  
23 with the NEPA and is an important part of the  
24 U.S. Air Force's overall commitment to an  
25 environmental stewardship.

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1           The EIS also helps the U.S. Air Force  
2 comply with other applicable federal and local  
3 regulations, requirements and permits. To  
4 date, government agencies, elected officials,  
5 community and environmental organizations, and  
6 individuals have all submitted comments at the  
7 scoping meetings, or provided written comments  
8 during the scoping period. The comments  
9 received were considered in the revisions to  
10 proposals and the preparation of the Draft EIS.

11           This Draft EIS is the result of  
12 extensive analyses in consideration of public  
13 and agency comments received during scoping  
14 period. Your inputs here tonight can only help  
15 to make it better. But this is not your only  
16 opportunity to get involved in the process.  
17 Next slide.

18           The U.S. Air Force is committed to  
19 keeping citizens informed throughout the NEPA  
20 process. In addition to holding these public  
21 hearings, U.S. Air Force has established a  
22 website [www.pacafdivertmarianaseis.com](http://www.pacafdivertmarianaseis.com) to make  
23 it easy for you to find and review  
24 environmental documents. The Draft EIS is  
25 posted on the website as well as additional

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1 information and the fact sheets available here  
2 tonight. You may also review a hard copy of  
3 the draft EIS by visiting one of the nine  
4 public libraries or major offices listed here.  
5 Next slide.

6           At this time, the U.S. Air Force is at  
7 the fourth stage in this list of the project  
8 schedule providing the Draft EIS for public  
9 review and comments. This phase is an  
10 essential part of the NEPA process because it  
11 allows the public to review Draft EIS and  
12 comment on the U.S. Air Force's analysis of  
13 potential environmental effects.

14           We encourage you to provide your input  
15 here tonight or by July 23<sup>rd</sup>, 2012 so that it  
16 can be considered in developing the analysis in  
17 the final EIS and in the decision-making  
18 process. Your input will be incorporated into  
19 the final EIS.

20           Comments on the Draft EIS may be  
21 provided orally or in writing here tonight or  
22 by internet or voicemail or mailing in written  
23 comments. Comments on the Draft EIS will be  
24 considered equally and responded to during the  
25 preparation of the final EIS. The final EIS is

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1 | scheduled to be released on November 2012, and  
2 | the record of decision is scheduled to be  
3 | signed in December of 2012. Next slide.

4 |           COLONEL ORR: Thank you, Major Toves.  
5 | We'll now move into the public comment part of  
6 | the hearing. And that's -- and here's how that  
7 | will work. I will use the speaker sign-up  
8 | sheet that those of you who had filled out, who  
9 | wanted to speak, filled out, and call the folks  
10 | up to the microphone. If you'd like to make an  
11 | oral comment here tonight and haven't signed up  
12 | yet, could you just raise your hand and some  
13 | folks will come around and take your  
14 | information?

15 |           Well, all right. Currently, we have it  
16 | set up so that the procedure gives each person  
17 | three minutes to speak. So, when I call your  
18 | name, come on down and we'll start the clock  
19 | when you're ready. To help the court reporter,  
20 | please begin by stating your name, and could  
21 | you spell out your last name, the name of any  
22 | organization, if any, that you represent.

23 |           Now, please don't provide any personal  
24 | information like your home address or phone  
25 | number. And again, your comments are being

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1 recorded verbatim. They'll be used to develop  
2 a transcript and a permanent record of this  
3 meeting and they will be published in the final  
4 EIS. Your name will be included along with  
5 your comments in the transcript. But personal  
6 home addresses and phone numbers would not be  
7 published in the final EIS.

8           Of course, you don't have to speak for  
9 the full three minutes; but to help you keep  
10 track of the time, the card -- let's see, where  
11 is it? Okay. The yellow card will let you  
12 know when you have 30 seconds left to speak.  
13 The red card will let you know when your three  
14 minutes is up. Now, you don't have to yield  
15 the remaining time to someone else. We'll just  
16 move on to the next person.

17           Now, tonight's hearing is scheduled to  
18 end at 8:00. And if everyone who has signed up  
19 has had to speak -- had a chance to speak  
20 before that time, I'll then as any speaker who  
21 would like an additional three minutes to  
22 expand on your comments if you want to do that;  
23 just let me know and we'll put another three  
24 minutes on the clock.

25           Now, if you want to add something later

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1 to your oral comments, or if you'd rather not  
2 speak tonight, once again, you can submit your  
3 written comments. There is no page limit on  
4 your written comments. And the Air Force will  
5 give you equal weight to oral or written  
6 comments, and both will become part of the  
7 official record and are included in the final  
8 EIS.

9           Now, just a few reminders before we get  
10 started. Please limit your comments to the  
11 Draft EIS because that's the purpose of this  
12 public hearing. Second, if you agree with the  
13 previous speaker on something, you can  
14 certainly say that but you don't need to use up  
15 your time repeating it since it's already on  
16 the record.

17           Finally, as I mentioned earlier, this  
18 is not a question and answer session, it's an  
19 opportunity for you to put on the record your  
20 views and concerns about the proposal that you  
21 want the decision-makers to consider.

22           Now, any questions that you pose during  
23 your comments will become part of the record  
24 and will be considered in developing the EIS in  
25 making a decision on the proposal. After we're

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1 done with the formal part of this, Air Force  
2 representatives will be available to continue  
3 to discuss things with you.

4 Are there any questions about the  
5 procedures before we begin? All right. Our  
6 first speaker for tonight is Mr. Rosiky  
7 Camacho; is he here? Where are you at?

8

9 PUBLIC COMMENTS BY ROSIKY CAMACHO

10

11 MR. CAMACHO: You know, I speak  
12 earlier but I don't remember. But this is my  
13 concern.

14 COLONEL ORR: Okay. Before you give  
15 your concern --

16 MR. CAMACHO: Yeah, I know --

17 COLONEL ORR: -- can I ask you to --

18 MR. CAMACHO: Yeah.

19 COLONEL ORR: -- spell your name?

20 MR. CAMACHO: Rosiky is my name.

21 COLONEL ORR: All right.

22 MR. CAMACHO: I need to spell my first  
23 name; R-O-K-I-S-Y.

24 COLONEL ORR: Okay.

25 MR. CAMACHO: And my last name is

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1 Camacho.

2 COLONEL ORR: All right.

3 MR. CAMACHO: C-A-M-A-C-H-O. My  
4 biggest concern is I live in two areas in the  
5 south, over in Aslito. And in Kobeler, I am  
6 actually further away from the airport. But  
7 the noise in Kobeler is practically higher in  
8 terms of vibration, so. When I move to Aslito,  
9 which is about two minutes walk, I don't have  
10 that vibration. Looking at your results on  
11 your decibels, my problem is this, is the  
12 consequences. Let's say for example, my tenant  
13 that is in Kobeler so decided that, you know,  
14 your base is not good in this area. So, they  
15 left. Now I end up with no tenant. And if the  
16 tenant so decided that -- she decided, they  
17 decided, because of that noise level is just  
18 bothering them, what action can I take? That's  
19 my concern.

O181

20 The other concern is, I've been  
21 listening, and that's about, you know, that  
22 building up there that is unfinished? The  
23 hotel? There is a surrounding there that  
24 there's some habitats. And I hope that they  
25 don't move to where I live. But -- because I

O180

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1 live about four blocks. And I hope that if  
2 those habitats, those birds, native species  
3 move to my place, now I become endangered, and  
4 what consequences can I take? And that's the  
5 concern.

O180

6 The other biggest concern is I looked  
7 at your contour and it seems that the level of  
8 decibels is kind of 65 dba; right? And if you  
9 look at the mass land area, it's about half of  
10 the population of Saipan. And what I'm saying  
11 is it seems half population of Saipan is  
12 affected. It makes more sense to protect the  
13 human.

O183

14 The last concern is, probably Tinian is  
15 the best place based on the report of the Air  
16 Force, saying that there's no such big events  
17 or biological or anything affected. And I know  
18 -- I know, that's how much -- he's going to  
19 give me his time.

O187

20 Anyway, let me give one last one. Now,  
21 I need to find in my own heart if -- is there  
22 any action that I can take? What action can I  
23 take to protect my consumer enemies or commerce  
24 enemies? Thank you, sir.

25 COLONEL ORR: All right. Thank you.

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1 Our next speaker for the evening is Mr.  
2 Kindlehicks. Okay. All right. And the next  
3 speaker is Ms. Ruth Tighe.

4  
5 PUBLIC COMMENTS BY RUTH TIGHE

6  
7 MS. TIGHE: Thank you. My name is Ruth  
8 Tighe, spelled R-U-T-H, last name is spelled T  
9 as in Thomas, I-G-H-E. I know this isn't  
10 supposed to be a question and answer session.  
11 But I did have a question as to what the  
12 timeframe -- what timeframe has been  
13 established for the construction? We know  
14 what's going to happen to the action. But no  
15 one has spelled out when the construction will  
16 start and how long and how slow. I wanted to  
17 note that I appreciate receiving a hard copy of  
18 the EIS in time to review it before the  
19 hearing. It was very helpful to me. I found  
20 it comprehensive -- comprehensive and readable  
21 with less charting than many other EIS reports  
22 I've seen. I may be putting my foot in my  
23 mouth but I support the implementation of the  
24 project and I support the implementation of it  
25 on Saipan because I believe that it would

O185

O177

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1 provide some much needed boost to our economy.  
2 And I wanted to get that on the record. I hope  
3 that the Air Force holds up to its promise to  
4 use best management practices, especially with  
5 science and compliance with like NEPA and  
6 historic preservation. Thank you.

O177  
O178

7 COLONEL ORR: Thank you. All right.  
8 Now, ladies and gentlemen, those are all the  
9 folks that have signed up to make comments  
10 tonight. Is there anyone here that hasn't  
11 signed up that would like to make some comments  
12 at this time? Yes, ma'am?

13

14 PUBLIC COMMENTS BY TERESA ARRIOLA

15

16 MS. ARRIOLA: My name is Teresa  
17 Arriola, A-R-R-I-O-L-A. My concern is that  
18 really that I'd like a little more clarity on  
19 the overall connection, or lack thereof, of the  
20 proposed actions being discussed tonight and  
21 the overall military buildup or marine  
22 relocation and the MIRC in the CNMI. I'm  
23 unsure how this connects or not with broader  
24 projects the U.S. military is conducting in the  
25 region.

O175

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1           Secondly, I have a concern for how  
2 mitigating efforts by the military will be  
3 completed after the EIS comes out with the  
4 final version, or the ROD. For example, if  
5 somebody has a concern about something that's  
6 happening because of a proposed impact, what  
7 can they do; can they say anything and how will  
8 it be included within the thing that the  
9 military does to mitigate? And also, I guess  
10 just a general comment about this type of forum  
11 is that it's quite intimidating to get up in  
12 front of everybody and to speak.

O179

13           So, I just feel like in terms of being  
14 a little more people-friendly especially for  
15 the local people here, I'd just like to express  
16 my disappointment with the way -- I don't  
17 believe this is extremely easy for someone to  
18 just get up especially if you have an opinion  
19 that doesn't necessarily agree with what's  
20 being expressed; to come up here and speak in  
21 front of everyone. That's extremely important.  
22 I guess if it's -- if things are being put on  
23 the record tonight, I think it's also important  
24 to recognize that on the record it should be  
25 known that not everybody -- unlike Ms. Tighe

O186

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1 here, I noticed that you did support -- you do  
2 express your support. I think it's important  
3 to recognize the -- that there are people on  
4 the island that may not even be here tonight  
5 that don't support many of the activities that  
6 the military are conducting in the area. So,  
7 for me, these are the comments that I would  
8 like to be put on the record. Thank you.

9 COLONEL ORR: Thank you. Is there  
10 anyone else that had not spoken tonight that  
11 would like to provide comments for the record?

12  
13 PUBLIC COMMENTS BY JAMES ARRIOLA

14  
15 MR. ARRIOLA: Good evening.

16 COLONEL ORR: All right.

17 MR. ARRIOLA: First of all, I'd like to  
18 thank you for the opportunity for us to have a  
19 public forum.

20 COLONEL ORR: Your name.

21 MR. ARRIOLA: Oh, my name is James  
22 Arriola, A-R-R-I-O-L-A.

23 COLONEL ORR: Okay.

24 MR. ARRIOLA: Good evening.

25 COLONEL ORR: That's okay.

↑  
O186

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1 MR. ARRIOLA: Again, thank you for the  
2 opportunity for us to come and speak here this  
3 evening. I believe it's important that our  
4 voices should be included in the process.  
5 However, I have heard on several occasions to  
6 enquire on the proposed project that all of the  
7 items that are going to be conducted --  
8 conducted are in line with the laws and  
9 policies and procedures of other entities aside  
10 from those people who are living here.

11 And my comment and my concern would be  
12 that although perhaps the items may have been  
13 translated into the opinion of someone from the  
14 United States as rudimentary, the majority of  
15 our population does not -- might not have the  
16 access or understanding of the terminology  
17 utilized in such a -- such an -- impacting item  
18 such as this in our country in the  
19 Commonwealth. And so therefore, my largest  
20 concern will be that although you may have  
21 complied with the law, to be considerate  
22 perhaps in the future of other alternatives  
23 that are in line with the indigenous people or  
24 local residents of this island, particularly in  
25 those who are not English speakers, inclusive

O184

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1 of the form, which is also not very culturally  
2 competent in a manner in which is conducted.  
3 So, if this item does pass, my concern is the  
4 vast majority of the indigenous people's  
5 voices, although the law was complied with,  
6 would not be fair on how it impact us here in  
7 the Commonwealth. Thank you.

↑  
O184  
↓

8 COLONEL ORR: Thank you. All right.  
9 Is there anyone else that has not spoken that  
10 would like an opportunity to provide comments  
11 at this time? All right. Are there any folks  
12 that have provided comments earlier that would  
13 like to expand on their comments? And we'll  
14 take Mr. Camacho first since he signed up.

15  
16 PUBLIC COMMENTS BY ROSIKY CAMACHO  
17

18 MR. CAMACHO: Sir, I think it's not  
19 very clear on the -- the airport. I'd like to  
20 comment that, you know, the share activities  
21 that is going on, has been slightly been  
22 mentioned, I'd like that to be written in more  
23 formal and what good it comes out, out of that  
24 share activities existing if you use Saipan.  
25 Second is, I'd like to emphasize the

↑  
O176  
↓

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1 surrounding areas especially the schools and  
2 southern high school -- then you have the  
3 elementary. And just to brief comment --  
4 actually we brought this up in a coffee shop  
5 and a lot of people said that there is  
6 commerce, the money is coming in due to this  
7 activities that the Air Force is coming in to  
8 use the airport. And I hope that is true.

↑  
O176

9 But my biggest concern is consequences  
10 and the impact that this activity that is going  
11 on. Just to brief, even the island of Guam  
12 from 75 to 79 Toto/Mongmong; and back then I  
13 have experienced those noise. And then I move  
14 on to Saipan in '84 and I have experience those  
15 noise. And I hope that those noise doesn't  
16 affect the environment. And my biggest  
17 question now is -- and I think it brought up  
18 tonight; is that what remedies that the Air  
19 Force or the military can assist us in case  
20 something really happen? I like this hearing  
21 because we can comment.

↑  
O182

22 COLONEL ORR: I would like to say that  
23 -- to address one of the concerns raised  
24 earlier that there is a Chamorro speaker  
25 translator here. So, if language is an issue,

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1 we can address that as well.

2 So, with that in mind, is there anyone  
3 else that would like to make a comment at this  
4 time?

5 PUBLIC: (none so indicate)

6 COLONEL ORR: Anyone else? All right.  
7 Well, as I mentioned earlier, the hearing is  
8 scheduled to end at 8:00. And it appears that  
9 we've heard from everyone who has signed up.  
10 And like I said, we have some time left so this  
11 is one more opportunity to raise your hand if  
12 you haven't spoken up to make your comments.  
13 Anyone?

14 PUBLIC: (none so indicate)

15 COLONEL ORR: All right. Thank you for  
16 your time and interest in the Divert Activities  
17 and Exercises EIS Proposal. But keep in mind  
18 tonight is not the end of your opportunity to  
19 participate in the environmental review  
20 process. Again, written comment sheets are  
21 available at the registration table and you can  
22 turn these sheets in tonight or you can mail  
23 them in later. The mailing address is printed  
24 on the fact sheets and the comments side cards.  
25 The Air Force welcomes public comments in

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1 writing or via voicemail at any time during the  
2 Environmental Impact Analysis process. To  
3 receive timely consideration for the final EIS,  
4 all comments must be submitted by July 23<sup>rd</sup>,  
5 2012.

6 Now, if you'd like to comment -- if you  
7 would like your own copy of the final EIS,  
8 please tell the folks at the registration table  
9 or send a letter or postcard asking for your  
10 own copy, and the Air Force will send you a  
11 final copy of the final EIS. Are there any  
12 questions or concerns at this time?

13 PUBLIC: (none so indicate)

14 COLONEL ORR: All right. Please keep  
15 in mind that the Air Force representatives are  
16 still available, the postal charts are still up  
17 along the wall here if you have any specific  
18 questions about the process or the proposal.  
19 And there being no interest or further comments  
20 at this time, the hearing is adjourned. And  
21 please have a safe trip home. Thank you.

22

23 (EIS Public Hearing concluded at 8:00 p.m.)

24 SUSUPE, SAIPAN: TUESDAY, JUNE 25, 2012.

25

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REPORTER'S CERTIFICATE

I, George B. Castro, Court Reporter, do hereby certify the foregoing 34 pages to be a true and correct transcript of the audio recording made by an Officer of Depo Resources at the time and place as set forth herein.

I do hereby certify that thereafter the transcript was prepared by me or under my supervision.

In testimony whereof, I have hereunto set my hand and seal of Court this 25<sup>th</sup> day of July, 2012.

\_\_\_\_\_  
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UNITED STATES AIR FORCE DIVERT ACTIVITIES AND  
EXERCISE ENVIRONMENTAL IMPACT STATEMENT  
PUBLIC HEARING

---

**TINIAN**

San Jose, Tinian

June 26, 2012

PREPARED BY: GEORGE B. CASTRO  
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**UNITED STATES AIR FORCE DIVERT ACTIVITIES AND  
EXERCISE ENVIRONMENTAL IMPACT STATEMENT  
PUBLIC HEARING**

Public hearing on the United States Air Force Divert Activities and Exercise Environmental Impact Statement, was taken on Wednesday, June 26, 2012, on the island of Tinian, before an Officer of Depo Resources.

**WELCOMING & INSTRUCTIONS**

COLONEL WILLIAM ORR ..... p. 4

**EIS BRIEFINGS**

MAJOR PETER TOVES ..... p. 6

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**PUBLIC COMMENTS**

BY MR. DON FARRELL ..... p. 23  
BY MR. JOSEPH CRUZ ..... p. 25  
BY MR. JOSE KIYOSHI ..... p. 26  
BY MR. IKE QUICHOCHO ..... p. 28

(End Public Comments)

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1 SAN JOSE, TINIAN: WEDNESDAY, JUNE 26, 2012, 6:00 P.M.

2  
3 UNITED STATES AIR FORCE DIVERT ACTIVITIES AND  
4 EXERCISE ENVIRONMENTAL IMPACT STATEMENT  
5 PUBLIC HEARING  
6

7 COLONEL ORR: Well, the time is now  
8 6:00. So, we'll go ahead and start the  
9 hearing. I'd like to begin by thanking you all  
10 for coming out tonight to this public hearing  
11 for the United States Air Force Divert  
12 Activities and Exercises Environmental Impact  
13 Statements which you'll hear refer to as the  
14 EIS.

15 Good evening, ladies and gentlemen.  
16 I'm Colonel William Orr, and as indicated, I  
17 will be the presiding officer for this public  
18 hearing on the Draft Environmental Impact  
19 Statement. This hearing is being held in  
20 accordance with the provisions of the National  
21 Environmental Act Policy Regulations that are  
22 published by the Council on Environmental  
23 Quality and corresponding Air Force Regulations  
24 on Environmental Planning.

25 The purpose of this hearing is to

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1 receive public comments, that is, your comments  
2 on the Draft Environmental Impact Statement  
3 commonly referred to as the Draft EIS. Now,  
4 before moving forward with the briefing, I'd  
5 like to explain my role in this hearing. I am  
6 the Chief Judge in the United States Air Force  
7 Court of Criminal Appeals based at Andrews Air  
8 Force Base in Washington D.C. I'm not assigned  
9 to Headquarters Pacific Air Forces, and I am  
10 not -- and I have not been involved in the  
11 development of the Draft EIS.

12 I normally preside over the appeals of  
13 military members who were tried in a trial by  
14 court marshal. But I have been asked to serve  
15 as the presiding officer in this hearing here  
16 tonight. My role is to -- as presiding officer  
17 is simply to ensure that we have a fair,  
18 orderly, and impartial hearing, and that all  
19 who wish to be heard will have a reasonable  
20 opportunity to speak. In summary, it is  
21 important that you understand that I will be  
22 serving as an impartial moderator for this  
23 hearing.

24 The hearing will be carried out in two  
25 parts. First, we will have information from

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1 Headquarters Pacific Air Command and they will  
2 define the proposed action and discuss the  
3 Environmental Impact Analysis process including  
4 what you can expect from the proposal. The  
5 second part of the program is your opportunity  
6 to comment on the analysis presented in the  
7 Draft EIS. We will begin with the Air Force  
8 presentation which will take approximately 30  
9 minutes. And then we will receive your  
10 comments on the Draft EIS. Major Toves, the  
11 floor is yours.

12

13 ENVIRONMENTAL IMPACT STATEMENT BRIEFINGS

14

15 MAJOR TOVES: Yes, sir. All right.  
16 The following topics will be discussed during  
17 this brief presentation to familiarize you with  
18 the Air Force and the proposed action and the  
19 EIS. Following this presentation, we will have  
20 the public hearing portion of this meeting  
21 where you will be able to make verbal comments  
22 on the EIS. Next slide, please.

23 Pacific Air Force's primary mission is  
24 to provide ready air and space power to promote  
25 U.S. interests in the Asia Pacific region

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1 during peacetime through crisis and in war.  
2 The Pacific Air Force's area of responsibility  
3 extends from the west coast of the United  
4 States to the east coast of Africa, and from  
5 the Arctic to the Antarctic, more than  
6 100,000,000 million square miles. This project  
7 is intended to support the overall PACAF  
8 mission by developing a divert airfield in the  
9 Marianas region. Next slide.

10 Under existing capabilities, there's no  
11 divert or contingency airfield on U.S.  
12 territory the western pacific that is designed  
13 and designated to provide strategic operational  
14 and exercise capabilities for U.S. Forces when  
15 needed, and humanitarian airlift and disaster  
16 relief in times of natural or man-made  
17 disasters.

18 The purpose of the proposed action is  
19 to establish additional divert capabilities to  
20 conduct divert landings in support of current  
21 emerging and future exercises on ensuring the  
22 capability to meet mission requirements in the  
23 event that access to Andersen Air Force Base or  
24 other western pacific locations is limited or  
25 denied.

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1           For example, during the 2011 earthquake  
2 and tsunami in Japan, the need for disaster  
3 response and humanitarian assistance arose  
4 suddenly and without warning. If this had  
5 occurred during scheduled training exercises at  
6 Andersen Air Force Base, then neither either  
7 training or response efforts might have been  
8 delayed or impeded.

9           Additionally, similar natural or man-  
10 made disasters could also impact Andersen Air  
11 Force Base's mission requiring reliance on an  
12 alternate design and designated divert  
13 airfield. Specifically, there are four  
14 operational requirements that are necessary to  
15 successfully support the PACAF mission driving  
16 a need for a divert airfield in the Marianas.  
17 And they are: ensure airfield accessibility if  
18 access to Andersen Air Force Base or other  
19 western pacific airfields is limited or denied,  
20 provide for contingency operations to include  
21 humanitarian airlift efforts, accommodate  
22 future increases in operational tempo and  
23 associated training and achieve and sustain  
24 readiness. Next slide.

25           For the purposes of this EIS, the study

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1 area includes existing airports in the Marianas  
2 region, existing seaports and surrounding areas  
3 including easements or routes needed to  
4 transport petroleum products. Because of the  
5 proximity to four deployed forces in the  
6 western pacific, the Marianas provides the best  
7 economic alternative for four deployed U.S.  
8 Forces to train on U.S. lands and develop a  
9 proposed additional and divert capabilities.  
10 Next slide.

11 The Proposed Action. The proposed  
12 action analyzed in the EIS is to develop  
13 critical enhancements to an existing airport or  
14 airports and associated infrastructure in the  
15 Marianas to increase operational and divert  
16 capabilities needed by the U.S. Air Force  
17 especially humanitarian relief and joint  
18 exercises.

19 The design for the proposed action is  
20 based upon twelve KC-135's, which is a wide-  
21 body tanker aircraft. However, the divert  
22 airfield could support any combination of  
23 cargo, fighter or tanker and other aircraft.  
24 The combination of plane types would not exceed  
25 the capabilities of the airport designed under

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1 the proposed action. Of the 700 support,  
2 personnel would accompany the squadron of a  
3 tanker aircraft. Next slide.

4 Specific components of the proposed  
5 action include improving or constructing  
6 airfield operational infrastructure which  
7 includes an expanded runway area, parking  
8 apron, associated pavement markings, lighting  
9 and security, and other related infrastructure,  
10 temporary munitions storage area, hazardous  
11 cargo pad and arm/disarm pad, aircraft hanger  
12 and maintenance facility, and jet refuel  
13 receiving storage and delivery capability.  
14 These improvements are considered construction  
15 phase of the proposed action.

16 Implementation phase of the proposed  
17 action will utilize the infrastructure improved  
18 and developed during the construction phase.  
19 Elements of the implementation phase include  
20 unplanned emergency landings if other locations  
21 in the western pacific are unavailable for  
22 landing; periodic joint and unit level military  
23 exercises, humanitarian airlift staging in the  
24 event of an emergency or disaster, and ability  
25 to support up to 700 temporary personnel during

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1 any of the events just described. Next slide.  
2 To meet the purpose and need to  
3 establish additional divert capabilities,  
4 divert activities and exercises Draft EIS  
5 analyzes two alternatives. For those of you  
6 who participated in public scoping, you may  
7 remember we originally discussed three  
8 alternatives. In response to the public  
9 scoping and after further evaluation of  
10 potential alternatives, the Air Force has  
11 analyzed two of the original three alternatives  
12 to the proposed action. The development and  
13 specifications of required facilities and  
14 infrastructure varies depending on the existing  
15 conditions at each alternative location.  
16 Saipan International Airport and Tinian  
17 International Airport are being considered as  
18 potential alternative locations for airfield  
19 improvements.  
20 The Draft EIS also includes a no-action  
21 alternative under which the U.S. Air Force  
22 would not develop or construct facilities and  
23 infrastructure at an existing airport or  
24 airports, and PACAF's ability to achieve and  
25 maintain military readiness will remain as is.

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1 For purposes of this EIS, the no-action  
2 alternative serves as the baseline level of  
3 current facilities in operations. As we  
4 discuss the alternative, please remember this  
5 is a no-change alternative.

6 The purpose of including a no-action  
7 alternative in the Environmental Impact  
8 Analysis is to ensure that agencies compare the  
9 potential impacts of the proposed major federal  
10 action to the known impacts of maintaining  
11 existing conditions. Next slide.

12 The Saipan alternative is the preferred  
13 alternative in the EIS because the analysis  
14 shows it's more consistent with U.S. Air Force  
15 operational requirements. Under the Saipan  
16 alternative, the U.S. Air Force will develop  
17 and construct facilities and infrastructure at  
18 Francisco C. Ada Saipan International Airport  
19 consistent with the facilities and  
20 infrastructure described under the proposed  
21 action.

22 The improved facilities and  
23 infrastructure would support a combination of  
24 cargo, fighter, and tanker aircraft, and  
25 associated support personnel for periodic

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1 exercises, unplanned divert landings, and  
2 humanitarian assistance and disaster relief in  
3 the western pacific. Next slide.

4 Under the Saipan alternative, the U.S.  
5 Air Force would also construct a two-boat fuel  
6 storage tanks at the Saipan Harbor to store  
7 fuel for aircraft operations. Next slide.

8 Under the Tinian alternative, the U.S.  
9 Air Force will develop and construct facilities  
10 and infrastructure at Tinian International  
11 Airport, also known as West Tinian Airport,  
12 consistent with the facilities and  
13 infrastructure described under the proposed  
14 action. The improved facilities and  
15 infrastructure will support a combination of  
16 cargo, fighter, and tanker aircraft, and  
17 associated support personnel for periodic  
18 exercises, unplanned divert landings, and  
19 humanitarian assistance and disaster relief in  
20 the western pacific. Tanker aircraft are the  
21 more likely used in the immediate future. Next  
22 slide.

23 Under the Tinian alternative, the U.S.  
24 Air Force would also construct a fuel storage  
25 tank at the Tinian Harbor to store fuel for

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1 aircraft operations. Next slide.

2           The analysis of the EIS indicates that  
3 there are only a few environmental resources or  
4 subjects that could potentially experience  
5 major adverse impacts as a result of the  
6 implementation of the proposed action. These  
7 resources and subjects include noise, water  
8 resources, biological resources, cultural  
9 resources, and minority and low-income  
10 populations. Next slide.

11           In the development of the final EIS,  
12 the U.S. Air Force will identify best  
13 management practices, mitigation efforts,  
14 measures, and design concepts that could help  
15 avoid any of these major adverse impacts to the  
16 extent practicable. The U.S. Air Force is  
17 committed to the unique environment, culture,  
18 and people of the Marianas Islands and would  
19 continue to conduct several environmental  
20 stewardship programs to protect the environment  
21 of the Mariana Islands. Next slide.

22           What we've given you is just a very  
23 brief summary of the Draft EIS and a listing of  
24 the associated impact areas and a description  
25 of mitigation. The development of management

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1 actions and mitigations is an ongoing process.  
2 And our primary reason for being here tonight  
3 is to record your concerns and allow us to  
4 continue developing these actions.

5 I emphasize the fact, this is only a  
6 draft document at this time and we need your  
7 assistance to continue refining the material.  
8 The Draft EIS was prepared by the U.S. Air  
9 Force to comply with the National Environmental  
10 Policy Act or NEPA. The Draft EIS represents  
11 compliance with NEPA and is an important part  
12 of U.S. Air Force's overall commitment to  
13 environmental stewardship. The EIS also helps  
14 the U.S. Air Force comply with other applicable  
15 federal and local regulations, requirements and  
16 permits. To date, government agencies, elected  
17 officials, community and environmental  
18 organizations, and individuals have also  
19 submitted comments at the scoping meetings or  
20 provided written comments during the scoping  
21 period. The comments received were considered  
22 in the revisions to proposals and the  
23 preparation of the Draft EIS.

24 The Draft EIS is the result of  
25 extensive analyses in consideration of public

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1 and agency comments received during scoping  
2 period. Your inputs here tonight can only help  
3 to make it better. But this is not your only  
4 opportunity to get involved in this process.  
5 Next slide.

6 The U.S. Air Force is committed to  
7 keeping citizens informed throughout the NEPA  
8 process. In addition to holding these public  
9 hearings, U.S. Air Force has established a  
10 website [www.pacafdivertmarianaseis.com](http://www.pacafdivertmarianaseis.com) to make  
11 it easy for you to find and review  
12 environmental documents. The Draft EIS is  
13 posted on the website as well as additional  
14 information and the fact sheets available here  
15 tonight. You may also review a hard copy of  
16 the draft EIS by visiting one of the nine  
17 public libraries or mayors offices listed here.  
18 Next slide.

19 At this time, the U.S. Air Force is at  
20 the fore stage in this list of the project  
21 schedule, providing the Draft EIS for public  
22 review and comments. This phase is an  
23 essential part of the NEPA process because it  
24 allows the public to review the Draft EIS and  
25 comment on the U.S. Air Force's analysis of

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1 potential environmental effects.

2 We encourage you to provide your input  
3 here tonight or by July 23<sup>rd</sup>, 2012, so that it  
4 can be considered in developing the analysis in  
5 the final EIS and in the decision-making  
6 process. Your input will be incorporated into  
7 the final EIS.

8 Comments on the Draft EIS may be  
9 provided orally or in writing here tonight or  
10 by internet or voicemail or mailing in written  
11 comments. Comments on the Draft EIS will be  
12 considered equally and responded to during the  
13 preparation of the final EIS. The final EIS is  
14 scheduled to be released in November 2012, and  
15 the record of decision is scheduled to be  
16 signed in December of 2012. Next slide.

17 COLONEL ORR: Thank you, Major Toves.  
18 As previously stated, we're here tonight  
19 because the Air Force is analyzing the  
20 environmental impact of the proposed divert  
21 activities and exercises. The hearing is held  
22 in accordance with the provisions of the  
23 National Environmental Policy Act and  
24 Regulations published by the Council on  
25 Environmental Quality and the Air Force.

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1           The purpose of this hearing is to  
2 receive your comments on the Draft EIS.  
3 Tonight's hearing is just one of several  
4 opportunities for public comments. Please keep  
5 in mind that the hearing is not a debate. It  
6 is not a vote on the Draft EIS, and it's not a  
7 question and answer session. The hearing is an  
8 opportunity for you to express your views and  
9 concerns about the adequacy of the  
10 environmental analysis and the potential  
11 environmental impacts associated with this  
12 proposal.

13           Comments about other unrelated issues  
14 won't assist in the decision-making process.  
15 And if you'd like to make a comment during the  
16 hearing, please put your name on the sign- --  
17 put your name on the sign-up sheet at the  
18 submit comments poster station.

19           Now, during the first part of the  
20 hearing, Air Force representatives provided you  
21 with information on the divert activities and  
22 exercises EIS as well as the description of the  
23 project and environmental impact analysis  
24 process. Tonight we have representatives  
25 involved in the process -- in the project from

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1 Headquarters Pacific Air Command, Air Forces,  
2 joint Base, Pearl Harbor, Hickam, in Hawaii.  
3 We have Major Peter Toves, Colonel Dwayne  
4 Thomas who is the Mission Support Group  
5 Commander from Andersen Air Force Base, and  
6 they're representing the proponent unit. We  
7 also have representatives from Headquarters  
8 Pacific Air Forces tonight, Ms. Carol Boudette,  
9 Mr. Mark Peterson, and Ms. Julie Huang. And  
10 transcribing tonight's hearing is Ms. Sullivan.

11 Now, in a moment I'll open the floor  
12 for comments if you'd like to make a statement  
13 on the record here tonight. Your comments will  
14 provide the decision-makers, for the divert  
15 activities and exercises proposal, the benefit  
16 of your knowledge of the local area and your  
17 concerns about the environmental analysis.

18 If you would like to provide written  
19 comments rather than speak here tonight, or if  
20 you would like to do both, written comments  
21 sheets are available at the how-to submit  
22 comments table. And you can hand your comments  
23 in tonight at the table after the hearing or  
24 you can mail them later. You can also provide  
25 comments on the project website or by leaving a

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1 message on the project voicemail. If you mail  
2 your comments, please send them to the address  
3 printed on the fax sheets in comment cards.  
4 The Air Force will consider comments received  
5 throughout the Environmental Impact Analysis  
6 process. But to make sure your comments are  
7 considered and documented in the final EIS,  
8 please submit your comments by July 23<sup>rd</sup>, 2012.

9 Now, if it looks like we're reading to  
10 you, it's because we are. Now, I apologize for  
11 that; but the briefings are written out to make  
12 sure that each speaker covers all the  
13 information for you.

14 Now, we'll move on to the public  
15 comment part of the hearing. And this is how  
16 it works. I will use this speaker sign-up  
17 sheet that those of you who wish to speak  
18 filled out, and call up the folks on the  
19 microphone. If you'd like to make an oral  
20 comment tonight and haven't signed up, could  
21 you please raise your hand and we'll make sure  
22 that we get your name.

23 All right. When I call your name, come  
24 on down. And in order to help the  
25 stenographer, please begin by stating your name

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1 and the name of the organization, if any, that  
2 you represent. It will also help if you spell  
3 out your last name. And please don't provide  
4 any other personal information like your home  
5 address or home phone number.

6           Again, comments are being recorded  
7 verbatim. And they will be used to develop a  
8 transcript and a permanent record of this  
9 meeting, and will be published in the final  
10 EIS. Your name will be included along with  
11 your comments in the transcript and will be in  
12 the final EIS. Personal home addresses and  
13 phone numbers will not be published in the  
14 final EIS.

15           We also ask that you not make any  
16 electronic presentations tonight, but if you  
17 would like to do so, you can certainly submit  
18 them as part of your written comments later.

19           Now, this hearing is set to end at 8:00  
20 tonight. And if everyone who has signed up at  
21 that time has had a chance to do so, I'll ask  
22 any speaker if they would like to expand on the  
23 comments that you've made earlier. And if you  
24 would like to do that, just let me know at that  
25 time.

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1           Now, if you want to add something later  
2 to your oral comments or if you would rather  
3 not speak here tonight, you can submit your  
4 written comments, and there is no page limit on  
5 the written comments. And the Air Force gives  
6 equal weight to oral and written comments.  
7 Both become part of the official record and are  
8 included in the final EIS. There also is a  
9 Chamorro translator here tonight, and if you  
10 don't feel comfortable making your remarks in  
11 English, she will be glad to assist you.

12           Now, just one more reminder before we  
13 get started. Please limit your comments to the  
14 Draft EIS because that's the purpose of the  
15 public comment period. Second, if you agree  
16 with the previous speaker on something, you can  
17 certainly say that. But you don't need to use  
18 up your time repeating comments since it's  
19 already on the record.

20           And finally, as I mentioned earlier,  
21 this isn't a Q&A session; it is an opportunity  
22 for you to put on the record your views and  
23 your concerns about the proposal that you want  
24 the decision-makers to consider. Any questions  
25 that you pose during your comments will become

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1 part of the record and will be considered in  
2 developing the EIS to make any final decision  
3 on the proposal.

4 After we're done with the formal part  
5 of this, Air Force representatives will be  
6 available to continue to discuss things with  
7 you. Does anybody have any questions on the  
8 process of asking questions here tonight?

9 THE PUBLIC: (none so indicate)

10 COLONEL ORR: All right. Apparently  
11 not. The first speaker then is Mr. Don  
12 Farrell. Is he here?

13

14 PUBLIC COMMENTS BY DON FARRELL

15

16 MR. FARRELL: Thank you very much,  
17 Colonel. My name is Don Farrell. I'm a 30-  
18 year old resident of the Island of Tinian. I  
19 find it very disappointing that the EIS has  
20 identified Saipan as the number one preference  
21 over the island of Tinian. For several  
22 reasons. The primary reason of course is that  
23 the covenant which established the Commonwealth  
24 of the Northern Mariana Islands including the  
25 technical agreement in Section 3 -- 803 of that

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1 Agreement, identified 2/3 of the Island of  
2 Tinian for military purposes and concluded that  
3 a -- not only have been identified for all  
4 future military uses, this included of course  
5 Farrillon and Medinesian and certainly on  
6 Saipan, and 2/3 of the island of Tinian. It  
7 also stated that should the United States ever  
8 need additional land, they would have to lease  
9 or purchase those lands from the CNMI; and that  
10 cost would be far greater than any cost that  
11 would be incurred by establishing the base here  
12 on Tinian.

P105

13 The second reason is, I believe that  
14 the AI's document is outdated. There are  
15 several economic development projects that are  
16 going on right now including creation of  
17 landfills, solid waste transfer station, and  
18 significant improvements to the harbor that are  
19 not listed in the EIS. I would like to suggest  
20 that the EIS meet technical work before it's  
21 submitted to the Secretary of the Air Force for  
22 consideration.

P109

23 The other thing is, that's simply  
24 stated, the people of Tinian sacrificed 2/3 of  
25 their island for the creation of the

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1 Commonwealth back in 1975 with the full  
2 expectation that a very large multiservice  
3 training base was going to be created on this  
4 island for the economic development of the  
5 people. And that base has never materialized.  
6 By taking this opportunity to create a divert  
7 base on Saipan which will have little advantage  
8 economically to the people of Saipan, instead  
9 placing it on Tinian, which would have  
10 tremendous economic development opportunities  
11 for the people of Tinian. They are doing a  
12 disservice to the people of Tinian; and I  
13 believe in the long run a disservice to United  
14 States Air Force and to the United States of  
15 America. Thank you.

P188

16 COLONEL ORR: All right. Thank you for  
17 your comments. Our next speaker for tonight, a  
18 Mr. Joseph Cruz.

19  
20 PUBLIC COMMENTS BY JOSEPH CRUZ  
21

22 MR. CRUZ: Thank you. I'm the vice  
23 chairman for the Tinian Council. My comment  
24 here is, it's been years that we've been  
25 waiting for the base to be fulfilled here in

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1 Tinian. For the record, I am a son of the  
2 former Senator Jose R. Cruz, he's one who  
3 negotiate the CNMI to become a U.S. citizen.  
4 It was President Ford at that time. And I was  
5 a little boy. I remember when I went to  
6 America with my dad, and spoke to the senators;  
7 and I remember when he sang the "God Bless  
8 America". So, here am I now, and I am so  
9 honored for you guys to come and try and build  
10 the base on Tinian. So, we ask you again that  
11 you use Tinian. And we've been waiting for  
12 America to fulfill what the promise for our  
13 island of Tinian. Thank you again.

P189

14 COLONEL ORR: All right. Thank you.  
15 All right. Our next speaker is Mr. Jose  
16 Kiyoshi. If we could ask you to spell your  
17 last name.

18  
19 PUBLIC COMMENTS BY JOSE KIYOSHI  
20

21 MR. KIYOSHI: Good evening. My name is  
22 Jose Kiyoshi. My last name is spelled with a  
23 K-I-Y-O-S-H-I. I'm the resident department  
24 head for the Department of Commerce here in  
25 Tinian. Hearing the Air Force searching for a

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1 divert airfield, we were happy. We were  
2 motivated with the mayor, the cabinet members,  
3 because -- that 30 years ago we gave up 2/3 of  
4 our land. There were promises made and there  
5 were promises broken. When we heard that the  
6 Air Force were looking for a divert airfield,  
7 like I said we were elated. As you guys know  
8 that our mayor is not shy of bringing or  
9 convincing the military to move here to Tinian;  
10 because one of our biggest problems is  
11 population-wise, we don't have the magnitude  
12 population. And hearing from the news that  
13 Saipan was preferred, we're kind of  
14 disappointed. Two-thirds of our land has been  
15 given away. And 30 years we're still waiting.  
16 And as you guys know that just the past few  
17 weeks, the Marine Corps left the island. When  
18 they came, the businesses were happy, the  
19 community were happy; so I hope again that the  
20 folks here, gentlemen, will bring back to the  
21 higher-ups and to please consider again trying  
22 to make any efforts in choosing. You guys have  
23 2/3, you know, military lease land; I'm hoping  
24 that the Air Force will consider that  
25 opportunity to be used. Thank you very much

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1 and good evening.

2 COLONEL ORR: All right. Our next  
3 speaker is Mr. Ike Quichocho. Could I ask you  
4 to spell your last name, please?

5

6 PUBLIC COMMENTS BY IKE QUICHOCHO

7

8 MR. QUICHOCHO: My last name is spelled  
9 Q-U-I-C-H-O-C-H-O. Please allow me to welcome  
10 all our visitors here to Tinian. I would like  
11 to express some same similar sentiment that the  
12 previous speakers shared, especially what Mr.  
13 Farrell has mentioned before. People of Tinian  
14 overwhelmingly support it for the leasing of  
15 2/3 of the island to the military, and with  
16 expectations that our small island be benefited  
17 from the military coming in.

P190

18 However, I would like also to note that  
19 -- first, I'll admit that I haven't really gone  
20 through the details of the EIS and its impact.  
21 And since we can't questions and so I would  
22 also -- my concern about on one hand, I  
23 heartily support any proposed use of our  
24 island, like I said, to help our economy here.  
25 And if that -- if Tinian is chosen as the

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1 divert site and the military should invest in  
2 upgrading our airport, then that is even, you  
3 know, there for us.

4           We also have a casino industry. And  
5 I'm not sure how that will impact our gaming  
6 industry. We may have only a single operating  
7 casino, but I am optimistic that our industry  
8 has the potential to grow; and that the Bibi  
9 area, which is near the airport -- connected to  
10 the airport, Tinian International Airport  
11 property, is down in that area is on a prime  
12 property on island that all prospective  
13 investors at that time, that might have been  
14 contacted, have expressed interest in investing  
15 in that property.

16           So, if we build a big hotel and casino  
17 with golf course, I don't know how, what impact  
18 is is going to be. So -- hope this is very  
19 helpful. But if I will review the details and  
20 I think that it may not really affect because  
21 it would be just use this on -- only on certain  
22 short period of time, then I think that I would  
23 welcome. And if it does not affect the  
24 commercial operation side of the airport such  
25 as cancelling flights, we're hoping that -- as

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1 | you can see our runway has been -- there's been  
2 | a lot of improvement. And the purpose of that  
3 | is to have direct flights, international, you  
4 | know, flights; so we're still pursuing that.

P192

5 |         And so, you know, if -- like I said,  
6 | I'm not too familiar with how that will affect  
7 | our industry. But I'm not sure also whether  
8 | there's still a chance that Tinian will be  
9 | chosen after the EIS, when Saipan is the number  
10 | 1 site. But if -- you know, if that can still  
11 | be changed, then please consider Tinian. I  
12 | think that -- like Mr. Farrell said and some  
13 | previous speakers that the people of Tinian are  
14 | expecting more. We have a very disadvantaged,  
15 | you know, situation being we're just so close  
16 | to Saipan, everything has to be duplicated and,  
17 | you know, it's a high cost of running  
18 | government operation, with the employees. The  
19 | bottom line is we want to have every  
20 | opportunity to develop the island or to help  
21 | our local economy. So, I will review the EIS  
22 | and see if this -- anticipate from for you to  
23 | submit a written comment. Thank you.

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24 |         COLONEL ORR: Thank you. All right.  
25 | Those are all the folks that have signed up for

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1 -- to speak tonight. Is there anyone else who  
2 has not done so that would like to make a  
3 comment at this time?

4 THE PUBLIC: (none so indicate)

5 COLONEL ORR: Is there anyone here that  
6 has already spoken that would like to expand on  
7 their comments?

8 THE PUBLIC: (none so indicate)

9 COLONEL ORR: All right. As I  
10 mentioned earlier, the hearing is scheduled to  
11 end at 8:00. And we have heard from everyone  
12 who signed up to speak, and there's still time  
13 to speak if you'd like to. And if you want to  
14 speak, just please raise your hand and we'll  
15 make sure that you have the opportunity to do  
16 so.

17 All right. It appears that everyone  
18 that wants to speak has done so. So, at this  
19 time I'd like to thank you for your time and  
20 interest in the Divert Activities and Exercises  
21 EIS proposal. But keep in mind tonight is not  
22 the end of your opportunity to participate in  
23 the environmental review process. Again,  
24 written comment sheets are available at the  
25 registration table and you can turn in those

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1 sheets in tonight or mail them later. The  
2 mailing address is printed on the fax sheets in  
3 the comment cards. The Air Force welcomes  
4 public comments in writing, via voicemail at  
5 any time during the Environmental Impact  
6 Analysis process. To receive timely  
7 consideration for the final EIS, all comments  
8 must be submitted by July 23<sup>rd</sup>, 2012. And if  
9 you'd like your own copy of the final EIS,  
10 please tell one of the representatives at the  
11 registration table or send a letter or postcard  
12 asking for your own copy; and the Air Force  
13 will send a copy of the final EIS to you. And  
14 the Air Force representatives will be around  
15 until around 8:00 if you have any additional  
16 questions. There being no further folks to  
17 speak, this hearing is adjourned. And I'd like  
18 to thank you all for coming out tonight; and  
19 please have a safe trip home.

20

21

22 (EIS Public Hearing concluded at 7:00 p.m.)

23 SAN JOSE, TINIAN: WEDNESDAY, JUNE 26, 2012.

24

25

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REPORTER'S CERTIFICATE

I, **George B. Castro**, Court Reporter, do hereby certify the foregoing 32 pages to be a true and correct transcript of the audio recording made by an Officer of Depo Resources at the time and place as set forth herein.

I do hereby certify that thereafter the transcript was prepared by me or under my supervision.

In testimony whereof, I have hereunto set my hand and seal of Court this 25<sup>th</sup> day of July, 2012.

\_\_\_\_\_  
George B. Castro

**DEPO RESOURCES**  
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**Court Reporter**  
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July 3, 2012

Capt. Rebecca Heyse, PACAF/PA  
25 E Street, Suite G-108  
Joint Base Pearl Harbor-  
Hickam, HI 96853  
ATTN: PACAF Divert Marianas EIS

Dr. Justine B. de Cruz, Beach Biology  
5 Osgood Ave.  
New Britain, CT 06053

Re: Draft Environmental Impact Statement for Divert Activities and Exercises, Guam and Commonwealth of the Northern Mariana Islands

Esteemed Capt. Heyse:

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement (EIS) for Divert Activities and Exercises, Guam and Commonwealth of the Northern Mariana Islands (CNMI). The clear format of the EIS, with numbered lines on each page, has simplified commenting on specific areas of the document. My remarks pertain almost exclusively to the portions of the EIS that describe and assess the effects of the proposed actions on terrestrial biological resources in the CNMI.

I was surprised that the Executive Summary, especially Tables ES 2 and 3, only mentions the impacts of the proposed alternatives on wildlife as being noise, possible displacement, and habitat loss. One of the most severe potential impacts on either Saipan or Tinian is the possibility of introduction and spread of the brown treesnake. The prospective impacts of this dreaded avian predator are well described in Section 4.6.1 and it is important that they be included in the ES as well.

Q194

Also disheartening was the lack of concrete information provided in ES 6, the Summary of Environmental Impacts. This section refers the reader to several, very long chapters in the EIS and a table, but omits any summary of environmental impacts. Less generalization and more specific information would be appreciated.

With respect to Table 3.6-2 starting on pp. 3-42, I have some questions about observations reported in the course of a couple of days of reconnaissance in Oct 2011 and during presumably more intensive surveys for Nightingale reed-warblers for the period of Feb and Mar 2012 on Saipan. First, could the rats reported as being the often urban *Rattus norvegicus* have been instead the more arboreal *R. exulans* (the Pacific rat), which is common in the forests of Saipan? How did the observers distinguish among the several *Rattus* species that might be present? I ask because without several morphological measurements one species could well be a mistaken for another. Second, the observers recorded Black drongos on Saipan? That would be note-worthy as the species is not usually present on the island (or on Tinian, as stated in Table 3.6-5). Some avian observers have confused starlings with drongos in the past and perhaps these identifications are also mistaken. The EIS surveyors reported seeing drongos frequently on both Saipan and Tinian (pp. 3-43 line 11, and pp. 3-55 line 9), which seems so unlikely that it is probably an error (either in transcription or identification) and the data should be verified. Third, although the White tern *Gygis alba* has sometimes commonly been called a fairy tern, it should not be

Q195

Q196

Q197

confused with the Fairy tern *Sternula nereis* that is mostly an Australian species. *G. alba* is common on both Saipan and Tinian while *S. nereis* is not. Did the observers actually see both species as recorded in Table 3.6-2? Was the airplane strike, noted as a fairy tern (pp. 3-46 line 37), in fact the Fairy tern, or one of the island's numerous White terns? And four, Rufous fantail is, I think, the more common spelling (as opposed to 'Roufous' in both Table 3.6-2 and 3.6-5).

Q197

To the list of wildlife attractant areas on pp. 3-47 and 3-48, it might be wise to add the dense, grassy wetlands extending southwest from Lake Susupe known as the CK Potholes. This area offers excellent habitat close to the airport for large water birds and flocking terns, many of which can be aircraft strike hazards.

Q198

On page 3-49 lines 27 and 28 (and in several other places in the document), the authors state that Section 7 consultations with the USFWS regarding impacts on endangered species, particularly the Nightingale reed-warbler and the Mariana common moorhen, are underway. Apparently the results of the consultations are not currently available and are only to be included in the final EIS. I was wondering why issuing the Draft EIS was not delayed until the consultations were completed so that the public might have a chance to comment on the proposed mitigation measures? Because "...short-term to long-term, direct and indirect, adverse impacts on threatened and endangered species would be expected from construction activities associated with the [sic] Alternative 1" (pp. 4-60 lines 42-44), would it not have been appropriate to include the supporting data for review in lieu of the opportunity to comment on the consultation results? As it stands, the Draft EIS does not give the public any information from the surveys conducted for endangered and threatened species in the proposed project area, so a critical component of the document is missing.

Q199

I believe that 'Micronesian gecko' is misspelled in Table 3.6-3 pp. 3-50. Also, Table 3.6-5 lists two types of Bridled white eyes observed during Oct reconnaissance surveys on Tinian. That is probably an error (perhaps in transcription) and should be corrected.

Q200

Unfortunately, the number of inaccuracies in the few tables reviewed makes one wonder about the veracity of the remaining information in the document. I hope this is a mistaken perception. Thank you once again for the opportunity to comment on the Draft EIS for Divert Activities and Exercises, Guam and Commonwealth of the Northern Mariana Islands. I am sending these remarks to you in both on-line and written format. I look forward to receiving a copy of the Final EIS.

Sincerely,

Dr. Justine B. de Cruz, Beach Biology



### Divert Activities and Exercises Draft Environmental Impact Statement Public Review Period Comment Form



Location: Dandan CNMI Date: 6/24/12

The U.S. Air Force invites you to participate in the public review period for the Divert Activities and Exercises Draft Environmental Impact Statement (EIS).

Comments must be postmarked or received online by July 23, 2012 at midnight EST for consideration in the Final EIS and the Record of Decision. Comments may be submitted at the public meetings using this form, via the project website at [www.PACAFDivertMarianasEIS.com](http://www.PACAFDivertMarianasEIS.com), via voicemail by calling 1-855-200-6734, or via U.S. Postal Service at the address below.

**Privacy Notice:** Public comments on this Draft EIS are requested pursuant to the National Environmental Policy Act (42 U.S.C. 4321 et seq.). All comments received during the comment period will be made available to the public and considered during Final EIS preparation. The provision of private address information with your comment is voluntary. However, this information is used to compile the mailing list for Final EIS distribution, and failure to provide such information will result in your name not being included on the list. Private address information will not be released for any other purpose unless required by law.

\*\*\*Please Print\*\*\*

First Name: Reo Last Name: Arriola

Affiliation/Organization: Dandan Elem. School Title: Vice Principal

Address: PO Box 501370 CK

City: Saipan State: MP Postal Code: 96950

Primary Phone Number: 989-8007

Primary Email Address: reo.arriola@cnmips.org

Comments:  
The CNMI PSS requires all schools to limit use of air-conditioning during the school day. We are allowed 4hrs per day, here at Dandan, we have it on 9-1pm.  
I'm concerned about the possible noise & distraction during the times when we have our windows open (due to no aircon) here at our campus.

R201

Please continue on reverse side...

Please hand this form in or mail by July 23, 2012 to:  
Capt Rebecca Heyse, PACAF/PA  
25 E Street, Suite G-108  
Joint Base Pearl Harbor-Hickam, HI 96853-4512  
ATTN: PACAF Divert Marianas EIS

Ignacio Cabrera

I think Tinian Water Quality and Recharge of Groundwater Aquifers needed to be resampled for war world II hazardous waste contamination such as Jet fuel, Arsenic and the airplane junkyard site.

} S202

12 July 2012

***Comment on Environmental Impact Statement for Divert Activities and Exercises,***

***Guam and Commonwealth of Northern Mariana Islands***

Comment: The Executive Agent should attempt to maximize the efficiency of this EIS while limiting the impact, this can be accomplished by linking it to other military/NEPA actions in the Marina Islands. The EA should evaluate the alternatives of this EIS relative to potential future cantonment and training locations. One known example is the Marine Corps relocation to Guam and CNMI. The Marine Corps has expressed interest in training on Tinian so the build-up of the port and airfield facilities seems to make more sense to be focused on Tinian. This seems to be the greatest efficiency for the tax payer. At a minimum, this important fact needs to be considered in the analysis.

T203



## Divert Activities and Exercises White Paper

Guam and the Commonwealth of the Northern Mariana Islands



**Benigno R. Fitial, Governor**

CNMI— Caller Box 10007 Saipan, MP 96950

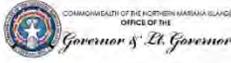
T: 670-664-2280



## Executive Summary

- ✍ The Commonwealth of the Northern Mariana Islands (CNMI) is supportive of the military and openly endorses a robust military presence in the Commonwealth
- ✍ The CNMI is especially pleased that the United States Air Force (USAF) has evaluated and considered the islands of Rota, Saipan, and Tinian for the proposed Divert Activities and Exercises initiative
- ✍ The CNMI looks forward to hosting the USAF Divert Activities proposed action within the Commonwealth
- ✍ The CNMI understands the USAF environmental analysis and the sensitivity to the financial implications and rationale on selecting Saipan as the Preferred Alternative
- ✍ The CNMI encourages the USAF to consider a more strategic and holistic approach, which leverages scarce Department of Defense resources on a joint service – joint international training complex on the island of Tinian
- ✍ Enhancing Tinian West Field supports the USAF Divert Activities mission, while also enhancing Tinian's training value
- ✍ Recent training exercises, inclusive of Marine Air Group 12 (MAG12) exemplifies the interoperability of missions in the region and justifies the need for a comprehensive integrated training venue
- ✍ Existing civilian infrastructure affords the potential of cost sharing, while the small civilian population does not generate significant compatibility challenges
- ✍ The choice of Tinian for the USAF Divert Activities is a step forward in fulfilling the intent of the long term lease between the Commonwealth and the United States
- ✍ The island of Tinian was pivotal to ending World War II and Tinian looks forward to serving the Nation once again.

U204

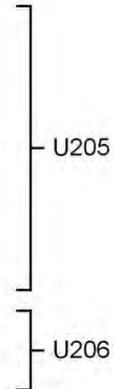


## Background

The Commonwealth of the Northern Marianas has been and will continue to provide support for all military initiatives as the Nation and Department of Defense pivot toward the Pacific. The islands of Saipan and Tinian played major roles during World War II and Tinian in specific had the world's busiest airport during the war.

The Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America defines the unique relationship between the Northern Mariana Islands and the United States, recognizing U.S. sovereignty but limiting, in some respects, applicability of federal law. On March 24, 1976, President Gerald Ford signed Public Law 94-241 (90 Stat. 263), enacting the Covenant. Some provisions became effective on that date, pursuant to Covenant Section 1003(a). Remaining provisions became effective on January 9, 1978, and November 4, 1986, the dates specified in Presidential proclamations issued pursuant to Covenant Section 1003(b)-(c). On the latter date, qualified residents of the Northern Mariana Islands became U.S. citizens.

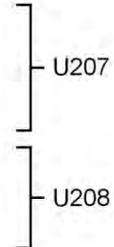
The CNMI is extremely supportive of the military and openly endorses a robust military presence throughout the Commonwealth. The Guam Buildup EIS from 2009 and Record of Decision in 2010 indicate that Tinian would host four live fire training ranges. Many joint training exercises have been conducted on Tinian over the past 30 years.



## Preferred Alternative

The Draft EIS has indicated that Saipan is the Preferred Alternative 1. CNMI officials understand that Saipan offers numerous advantages such as access to fuel vessels, better infrastructure, a control tower, and existing fuel storage capabilities. We also realize that any improvements made on Saipan will only enhance our islands and region for future military actions. If the USAF determines that Saipan is indeed so advantageous to this mission we will welcome the Air Force to the Commonwealth.

We realize that this study looks only at impacts the activities will have on environmental issues and weighs them accordingly. Our major concerns to the Preferred Alternative 1 are the noise impacts to the villages of Koblerville, Dan Dan and San Antonio, the requirement for additional land leases on and around Commonwealth Ports Authority (CPA) property and the Cultural Resource adverse impacts on AsLito/Isley Field National Historic Landmark.





## Tinian

The island of Tinian was pivotal to ending World War II. The residents on the island of Tinian are willing and ready to host the Department of Defense and serve the Nation. Current training exercises, such as Operation Geiger Fury, have been extremely successful and underscore why the U.S. Government and the Government of Japan are evaluating a joint training complex, within the Commonwealth. The addition of the Divert Activities and Exercises initiative on Tinian allows DoD to leverage its scarce resources on a joint-service and joint international training complex. Tinian is well postured having the required land to carry out the Divert Activities and Exercise mission, within the existing military lease area.

} U209

The initial Tinian investment would be slightly higher if it is viewed as a stand alone action. However, as an initial component to a long term strategic initiative the delta in initial costs are insignificant and are easily off-set by long term return on investment. Investing in Tinian is in concert with and reinforces DoD's pivot to the Pacific Region.

} U210



## Closing

The CNMI extends our appreciation to the USAF for evaluating and considering Rota, Saipan and Tinian; for affording us the opportunity to express our thoughts on this critical action; and to hosting the Divert Activities and Exercises. We will continue to support and serve our Nation and the Department of Defense. The CNMI has a date with destiny and is ready to respond as the focus shifts to the Asia Pacific region.

} U211

**Comment Response Matrix**  
**Public Draft Environmental Impact Statement (Public DEIS)**  
**EIS for Proposed Divert Activities and Exercises, Guam and Commonwealth of the Northern Mariana Islands (CNMI)**

Comment Reference Number	Category	Reviewer	Page	Line	Section	Comment	Response	Comment Method
A1	Environmental Justice Noise	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director Communities and Ecosystems Division	N/A	N/A	N/A	<p>The DEIS reveals that Saipan has disproportionately high minority populations and disproportionately high low-income populations in some areas, and that noise impacts would represent “a disproportionate impact on disproportionately high minority populations within District 10” (p. 4-114). It also states that “the USAF will conduct outreach to the potentially impacted communities to ensure they are engaged in the NEPA process and are part of the mitigation development process, if it is determined that mitigation is required” (p. 4-114). It is not clear what criteria the Air Force is using to determine when mitigation is required; nor is it clear whether or not the impacted community has yet been engaged. For outreach to be meaningful, especially to environmental justice communities, it should occur early in the NEPA process.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> <li>• If outreach to the community on Saipan has not yet occurred, it should occur as soon as possible, with commenting opportunities provided, before the FEIS is published. Information on noise impacts should be provided in a clear way that is meaningful and understandable to the public. Materials should be translated as appropriate.</li> <li>• The FEIS should clarify what criteria the Air Force is using to determine when mitigation is required.</li> </ul>	<p>Community outreach to potentially impacted communities with high minority populations and low income populations on Saipan occurred in the form of special notices and two community outreach meetings the weekend prior to the public hearing on Saipan (June 23 and 24, 2012). Informational flyers which provided notice of these community outreach meetings were distributed by hand at local stores and other locations within the potentially affected neighborhoods. (Local convenient stores are centers for community information as they contain local community bulletin boards and are a general gathering place for the community.) A simplified fact sheet that focused on noise was developed for the meetings and meeting attendees were provided the opportunity to comment. A general informal town meeting format was used to provide the best interaction with the public. Additional commenting opportunity is provided for the Revised Draft EIS. Finally, the USAF proposes to remove fighter jets from its proposal and to reduce the number of KC-135 operations, thereby eliminating the noise concern to the potentially affected communities.</p>	Postal Mail

Comment Reference Number	Category	Reviewer	Page	Line	Section	Comment	Response	Comment Method
A2	Environmental Justice Noise	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director Communities and Ecosystems Division	N/A	N/A	N/A	<p>The DEIS concludes that while disproportionate impacts would occur to minority and low-income populations, this impact would not be significant because it would occur intermittently up to 8 weeks per year (p. 4-114). This is confusing since the DEIS acknowledges significant noise impacts on page ES- 12. Additionally, Council on Environmental Quality's (CEQ) NEPA Regulations state that "significance cannot be avoided by terming an action temporary" (40 CFR 1508.27(b)7). The noise levels predicted in the DEIS are very high and much higher than the significance threshold of DNL 65 dB identified by FICON, in which the Air Force was a member (see footnote #9).</p> <p>Recommendation:</p> <ul style="list-style-type: none"> <li>The FEIS should acknowledge that noise impacts are significant, in general, and, therefore, significant to the environmental justice community.</li> </ul>	The USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	Postal Mail
A3	Environmental Justice Noise	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director Communities and Ecosystems Division	N/A	N/A	N/A	<p>The DEIS identifies "quality of life" in the discussion of sociocultural issues and states that "quality of life relates to the ability of Saipan and Tinian to adequately support the Proposed Action, including how the island's general tranquility, family and community relations, cultural identity, infrastructure, social services, and standards of living could be affected" (p. 3-109). The DEIS does not discuss the impact of noise on the island's general tranquility in its discussion of sociocultural impacts. Based on the noise levels predicted, adverse sociocultural issues may not be negligible as stated in the DEIS (p. 4-113).</p> <p>Recommendation:</p> <ul style="list-style-type: none"> <li>The FEIS should reassess the sociocultural impacts of the proposed project, including impacts on the island's general tranquility.</li> </ul>	The USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public. Section 4.14 addresses sociocultural impacts.	Postal Mail
A4	General	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director Communities and	N/A	N/A	N/A	<p>Based on our review, we have rated the DEIS's Preferred Alternative as Environmental Objections -Insufficient Information (EO-2) (see enclosed "Summary of Rating Definitions").</p> <p>"EO" (Environmental Objections): The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial</p>	The USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	Postal Mail

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		Ecosystems Division				changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts. Category “2” (Insufficient Information): The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.	Mitigation and BMPs are provided in detail in the Revised Draft EIS in Section 4.16.	
A5	General	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director Communities and Ecosystems Division	1-3, 1-10	N/A	N/A	The DEIS states that portions of the Marianas Trench Marine National Monument are not within the Study Area but are to the north and south of the Study Area (p. 1-3, line 32). However, the DEIS also states that “the Mariana Islands Range Complex (MIRC) and the [Divert Activities] Study Area are the same geographical areas” (p. 1-10, line 30). We note that the MIRC FEIS states that “the MIRC and the [MIRC] Study Area are the same geographical areas” (MIRC FEIS, p. ES-1) and that “portions of the Marianas Trench Marine National Monument lie within the [MIRC] Study Area” (MIRC FEIS, p. ES-2). Clarify this discrepancy in the FEIS.	The Draft EIS does not state that the MIRC and the Divert Study Area are the same geographical area. The paragraph referred to in the comment, previously on page 1-10 of the Draft EIS, is entirely dedicated to describing the MIRC EIS because it is incorporated into the Divert EIS by reference. The sentence referenced in the comment is a description of the MIRC and the MIRC Study Area, not the Divert Study Area as inferred. Text revised for clarification in the EIS.	Postal Mail
A6	General	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director Communities and Ecosystems Division	4-31, 4-88	N/A	N/A	The DEIS mentions “demolition activities” that would occur for Alternative 1 (p. 4-31) but demolition was not identified in the project description, and p. 4-88 states that Alternative 1 does not entail building demolition. Clarify this discrepancy in the FEIS.	Alternative 1 does not include demolition activities. Text revised on former p 4-31 for clarification and on other pages in the EIS, as applicable.	Postal Mail
A7	General	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director Communities	Table 1.5-1			Table 1.5-1 states that no permit will be needed under the Clean Water Act, but that a stormwater general permit will be needed for construction activities. Such permits are issued pursuant to the Clean Water Act.	Text in the table revised per comment.	Postal Mail

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		and Ecosystems Division						
A8	Human Health and Safety Noise	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director Communities and Ecosystems Division	N/A	N/A	N/A	<p>The DEIS does not discuss the potential health effects from noise. There is increasing evidence that noise impacts have non-auditory health effects. A 2007 review article that summarizes studies from the National Library of Medicine database on the adverse health effects of noise concludes that “the potential health effects of noise pollution are numerous, pervasive, persistent, and medically and socially significant. Noise produces direct and cumulative adverse effects that impair health and that degrade residential, social, working, and learning environments with corresponding real (economic) and intangible (well-being) losses”. Long-term physical health effects have been linked to noise effects related to sleep disturbances, stress, cardiovascular response, and increased blood pressure. The mental health effects that noise is suspected to cause or contribute to include anxiety, emotional instability, mood changes, increase in social conflicts, neurosis, and psychosis.</p> <p>Recommendation: Disclose the physical and mental health impacts that have been linked to the project noise levels identified in the FEIS.</p>	The USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	Postal Mail
A9	Human Health and Safety Noise	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director Communities and Ecosystems Division	N/A	N/A	N/A	<p>Pursuant to Executive Order 13045 - Protection of Children from Environmental Health Risks and Safety Risks, the DEIS concludes that the Proposed Action would not result in disproportionate risks to children from environmental health risks or safety risks; however, because there is no discussion of noise impacts on children’s health and learning, this conclusion is not supported. The DEIS identifies 3 schools that fall into the 70 dB noise contour under the medium and high scenarios for Preferred Alternative 1 (p. 4-7, 4-12). Under baseline conditions, none of these land uses are within the 65 dBA DNL noise contour (p. 3-4). Dandan Elementary School noise would increase from 46 dBA to over 70 dBA, Koblerville Elementary School from 50 dBA to over 70 dBA, and Saipan Southern High School from 49 dBA to over 70 dBA. These are substantial noise increases - decibels are on a logarithmic scale, and an increase of 10 dBs represents a</p>	The USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	Postal Mail

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						<p>subjective doubling of loudness. Elevated noise levels at schools are of concern because research on the effects of aircraft noise on student learning indicates interference with reading, motivation, language and speech, and memory. These represent acoustical barriers to learning, especially for young children since they are more susceptible than adults to the effects of background noise on spoken communication. Goines and Hagler (2007), in their review article cited above, concluded that children are particularly vulnerable to the effects from noise interference with spoken communication. The inability to comprehend normal speech may lead to a number of personal disabilities, handicaps, and behavioral changes. Children who live in noisy environments have been found to have heightened sympathetic arousal indicated by increased levels of stress-related hormones and elevated resting blood pressure. Noise is assumed to accelerate and intensify the development of latent mental disorders and children may be particularly vulnerable to these effects because they may lack adequate coping mechanisms. The review article concludes that because children are particularly vulnerable to noise induced abnormalities, they need special protection, and the evidence is strong enough to warrant monitoring programs in schools and elsewhere to protect children from noise exposure. The DEIS does not identify these impacts to children's health and learning, nor are any mitigation measures identified, as required by 40 CFR 1502.16(h). Recommendations: Disclose impacts to children including potential health impacts and impacts to learning. Identify possible mitigation measures, including retrofitting impacted schools with appropriate measures to achieve the classroom acoustics standard of the American National Standards Institute (ANSI). This could include adding insulation, adding a second window pane or replacing windows with better sound attenuation, sealing gaps or leaks in windows and doors, installing baffles in vents and improving the exterior roofing, consistent with radon safety. Indicate whether noise insulation at these schools could achieve the ANSI acoustical performance criteria with the noise levels predicted from the Proposed Action, specifically the requirement that the one-hour average background noise level not exceed 35 dBA in core learning</p>		

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						spaces smaller than 20,000 cubic feet and 40 dBA in larger spaces. Identify possible funding sources for this mitigation and the likelihood that mitigation would occur. See comment below on noise mitigation.		
A10	Infrastructure and Utilities	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director Communities and Ecosystems Division	N/A	N/A	N/A	<p>The description in the DEIS of the water supply quantity and quality conditions on Saipan is largely accurate with regard to water shortages, the lack of a 24-hour water supply for residents, and high chlorides (saltiness) of the existing groundwater supply. The DEIS states, however, that “it is assumed that both capacity and quality of water at GSN are sufficient to support personnel under both the construction phase and the implementation of the Proposed Action” (p. 3-90). It also characterizes impacts as minor and adverse, noting that they would occur on an already strained system (p. 4-100). Even though the water demand from the project is relatively small, if the BEAR site option is used for billeting and water withdrawal is concentrated in one area (in the vicinity of the intersection of Flame Tree Road and Airport Access Road, p. 2-26), the increase in demand for the 8 weeks per year could have significant localized impacts on the water distribution system in that area. In addition, because of the noted water quality problems, water is deemed too salty for drinking and most residents on Saipan purchase bottled water or groundwater treated by reverse osmosis for drinking.</p> <p>Recommendation: The FEIS should evaluate localized impacts to the water supply system for the 8 weeks during which exercises would occur. The Air Force should consider the existing deteriorated system in determining significance of these impacts. We recommend working with the CUC to determine the intake locations that would minimize localized impacts, and whether any additional facilities (additional source capacity and/or storage) are warranted. The commercial lodging option appears likely to reduce localized impacts to the water supply system since it is less centralized. If the BEAR Site is used for billeting, the FEIS should note the probable need for bottled drinking water or treatment of some water via reverse osmosis.</p>	The USAF has revised its proposal based on agency and public comments on the Draft EIS. Due to the reduced scope of the revised proposal, the USAF is providing an additional opportunity to comment on the proposed action and alternatives by making a Revised Draft EIS available to agencies and the public. The EIS has been revised to state that the USAF will coordinate with CUC to avoid localized impacts.	Postal Mail
A11	Infrastructure and Utilities	Agency Stakeholder EPA Region 9	N/A	N/A	N/A	The DEIS states that a 2-inch water supply line would be required for the proposed hangar, maintenance facility, and billeting areas (p. 4-96). A water line of this size may not	Text has been revised to state he proposed maintenance facility would require permanent 6-inch water connections for the	Postal Mail

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		Enrique Manzanilla, Director Communities and Ecosystems Division				be consistent with local codes and could be insufficient to provide flows needed for fire-fighting. Recommendation: The FEIS should indicate whether a 2-inch water line is consistent with local codes and with military codes.	fire water line and 1.5-inch domestic water line connections.	
A12	Infrastructure and Utilities	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director Communities and Ecosystems Division	N/A	N/A	N/A	The DEIS estimates the daily increased water demand at approximately 68,000 gpm when the facilities are in use. This is roughly equivalent to one or two of the existing Commonwealth Utility Corporation (CUC) groundwater wells. Recommendation: Coordinate with CUC to ensure sizing is sufficient for all water needs.	Text revised per comment in Section 4.13 to state that implementation would result in the consumption of up to 25,970 gallons per day, due to the reduction and personnel that would be on-island during exercises. Text also revised to state that the USAF would coordinate with the CUC to ensure the water supply is sufficient.	Postal Mail
A13	Infrastructure and Utilities	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director Communities and Ecosystems Division	N/A	N/A	N/A	The DEIS accurately describes the conditions of the existing wastewater and sewer systems on Saipan, noting that they are not in compliance with their EPA National Pollutant Discharge Elimination System (NPDES) Permit requirements and the Clean Water Act. While capacity at the wastewater treatment plants is not an issue, the flows, although minor, could exacerbate the noncompliant condition. CUC is currently undergoing a Master Planning process which details the necessary upgrades that are needed to bring the plants into compliance. Recommendation: We recommend coordinating with CUC to determine how the Air Force can utilize the wastewater and sewer system in a manner that is consistent with the proposed draft master plan for Saipan and that will not contribute to noncompliance.	Text revised per comment in Section 4.13.	Postal Mail
A14	Natural Resources	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director Communities and Ecosystems	4-60, 4-61	37	N/A	Biosecurity is a concern for the Preferred Alternative 1 as well as Alternative 2 on Tinian. Increased aircraft activities will increase the potential for the introduction of invasive species, including the brown tree snake, which the DEIS indicates has already been detected on Saipan (p. 4-60). The DEIS states that the U.S. Air Force will commit to implementing 100 percent inspection of all outgoing aircraft from Guam for the brown tree snake, and that redundant inspections “will be” conducted on Saipan (p. 4-60, line 37).	The text was modified to state that redundant inspections would be conducted on Saipan or Tinian as required. Impacts of other invasive species are discussed in Section 4.6. As stated in Section 4.16 and referred to in Section 4.6, the USAF will develop and implement Hazard Analysis and Critical Control Point Plans to evaluate the risks of transporting and introducing	Postal Mail

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		Division				On page 4-61, the DEIS states that redundant inspection "could be" conducted on Saipan during project development and training activities (line 37). The DEIS does not discuss the potential for other invasive species to be introduced on Saipan or Tinian from the project. According to the U.S. Fish and Wildlife Service (USFWS), other invasive species of concern in the CNMI are the little fire ant, the greenhouse frog, and the coconut rhinoceros beetle. Recommendation: Clarify in the FEIS whether the Air Force will commit to redundant inspections on Saipan during project development and training activities, and identify whether there is sufficient capacity and infrastructure to perform these inspections or whether additional capacity is needed. Work with USFWS to obtain their concurrence on the biosecurity program	invasive species. The USAF completed Section 7 consultation with USFWS and would implement invasive species control and interdiction requirements as described in the <i>Biological Opinion for Divert Activities and Exercises, at Saipan International Airport, CNMI</i> . The text of the EIS was revised in Section 4.6 to include information obtained during that consultation process. The USAF is currently undergoing Section 7 consultation for the Proposed Action on Tinian.	
A15	Noise	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director Communities and Ecosystems Division	N/A	N/A	N/A	The noise impacts predicted to occur to residents on Saipan for 8 weeks per year are severe, with some residents exposed to levels that could put them at risk for potential hearing loss. Despite these findings, the noise impact assessment is minimal, and does not provide supplemental noise analysis (metrics other than minimum Day-Night Average Sound Level or DNL), nor does it evaluate potential for hearing loss for populations exposed to DNL 80 decibels and above. This appears inconsistent with an applicable DoD internal directive that requires hearing loss risk be estimated for these populations. According to Table 1 of the Guidelines for Considering Noise in Land Use Planning and Control, Federal Interagency Committee on Urban Noise, 1980, the noise exposure class for noise levels above DNL 75 dB are classified as "severe exposure".	The noise analysis in Section 4.1 was revised based on input from public and agency comments, Headquarters Air Force, AFCEC, and FAA. The USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available to the public.	Postal Mail
A16	Noise	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director Communities and Ecosystems Division	N/A	N/A	N/A	The DEIS predicts that 11,095 residents would be periodically exposed to noise levels between DNL 65 and 80 dBA (A-weighted decibels). Land use compatibility guidelines published by the Federal Interagency Committee on Urban Noise (FICUN), an interagency committee - of which Department of Defense was a member - formed to develop Federal policy and guidance on noise, concluded that residential land use is incompatible with noise levels above DNL 65 dB unless measures are taken to achieve additional Noise Level Reduction (NLR). DoD's own policy regarding DoD air installations echoes these guidelines	The noise analysis was revised based on input from the public, Headquarters Air Force, AFCEC, and FAA. A more thorough land use compatibility assessment was completed based on these revisions to the noise analysis and is presented in Section 4.10. The USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby	Postal Mail

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						when it states that residential use is discouraged in areas exposed to DNL 65-69 dB and strongly discouraged in areas exposed to DNL 70-74 dB. The fact that the noise impacts would only occur for 8 weeks per year does not eliminate this land use incompatibility.	eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	
A17	Noise	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director Communities and Ecosystems Division	N/A	N/A	N/A	The Preferred Alternative predicts that a sizable portion of Dandan would receive noise levels at DNL 75 dB or above. The DEIS also acknowledges that this noise [ noise levels at DNL 75 dB or above] will disproportionately affect minority and low-income populations, yet there is no evidence that outreach to these communities has occurred. We are also concerned that three schools will receive impacts greater than DNL 70 dB.	Community outreach to potentially impacted communities with high minority populations and low income populations on Saipan has occurred in the form of special notices and two community outreach meetings the weekend prior to the public hearing on Saipan (June 23 and 24, 2012). Informational flyers which provided notice of these community outreach meetings were distributed by hand at local stores and other locations within the potentially affected neighborhoods. (Local convenient stores are centers for community information as they contain local community bulletin boards and are a general gathering place for the community.) A simplified fact sheet that focused on noise was developed for the meetings and meeting attendees were provided the opportunity to comment. A general informal town meeting format was used to provide the best interaction with the public. Additional commenting opportunity is provided for the Revised Draft EIS. Finally, the USAF proposes to remove fighter jets from its proposal and reduce the number of KC-135 operations, thereby eliminating the noise concern to the potentially affected communities.	Postal Mail
A18	Noise	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director Communities and Ecosystems	N/A	N/A	4.1	We have significant concerns regarding the noise impacts to residents in Saipan under Preferred Alternative 1, especially under the medium and high scenarios evaluated. The noise analysis under the high scenario indicates that, for an average busy day during the military exercises 8 weeks per year, 11,095 residents would be periodically exposed to noise levels within the 65 to 80 dBA (A-weighted decibels) DNL (Day-Night Average Sound Level) noise contours (p. 4-12). The DEIS states that, according to the U.S. Air Force, Federal Aviation Administration (FAA), and Housing and	The noise analysis was revised based on input from the public, Headquarters Air Force, AFCEC, and FAA. A more thorough land use compatibility and noise impact assessment was completed based on these revisions to the noise analysis as presented in Section 4.1 and 4.10. The USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high	Postal Mail

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		Division				<p>Urban Development (HUD) criteria, noise-sensitive land uses at or above the 65 dBA DNL contour are considered to be within “areas of high noise exposure” (p. 4-4). EPA believes that it is also important to disclose that, according to Federal Interagency Committee on Urban Noise (FICUN) Guidelines for Considering Noise in Land Use Planning and Control (1980), which were developed by the same agencies as above, noise exposures greater than DNL 65 dB are generally not considered compatible with residential land use. The FICUN Guidelines treat areas above DNL 65 dB as marginally compatible to incompatible with residential land use, depending on the degree of noise level reduction (NLR) provided in affected structures. The FICUN land use compatibility guidelines for noise exposure between DNL 65-70 dB call for building codes to require at least 25 dB outdoor to indoor NLR; and, for exposures between DNL 70-75 dB, at least 30 dB NLR is recommended. FICUN considered noise exposure above DNL 75 dB to be "incompatible" with all residential uses except transient lodging with NLR of at least 35 dB. The DEIS does not discuss the housing structures present on Saipan in relation to noise attenuation potential and whether the current buildings are capable of achieving NLR levels specified above for the indicated noise exposures. Based on Figure 4.1-4, it appears that, of the over 11,000 residents that would be impacted by 65+ dBA DNL, a large percentage would fall above the 70 dBA DNL noise contour, and some above the 75 and 80 dBA DNL. This is a wide range, and the analysis does not provide a breakdown of population exposed for each noise contour.</p> <p>Recommendation: The noise analysis in the FEIS should be improved. We recommend that the following be included:</p> <ul style="list-style-type: none"> <li>• Provide a breakdown of the population that would be exposed in each noise contour. Quantify the number of residents that would be “highly annoyed” as defined in Table 4.1- 1 (Feingold data);</li> <li>• Quantify the number of dwellings that would fall under each noise contour. Disclose that noise levels above 65 dB are normally considered incompatible with residential land use;</li> <li>• Discuss the construction materials and methods of housing</li> </ul>	<p>noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.</p>	

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						structures on Saipan in relation to noise attenuation potential and indicate the probable noise level reduction these structures would be capable of achieving.		
A19	Noise	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director Communities and Ecosystems Division	N/A	N/A	N/A	<p>Despite the high noise levels predicted, no supplemental noise analysis was performed. Supplemental metrics are useful in characterizing specific events and conveying a clearer understanding of the effects impacted communities can expect on their living and working environments as a result of the Proposed Action. For example, single event analysis is useful in evaluating sleep disturbances. Since, for this project, it is assumed that 30% of the flights will occur at night (p. 4-3, 6, 9), this would be an appropriate noise metric to use. No single event noise levels were identified for the Preferred Alternative 1. Similarly, metrics expressing noise impacts in terms of speech interference are also useful for public disclosure. The analysis in the Marine Corps' West Coast Basing of the F-35B EIS presented data for both indoor speech interference and indoor sleep disturbance for representative residences with windows open and windows closed. The F-35B EIS also identified the number of housing units affected in each noise contour above DNL 65 dB, which is useful for disclosing impacts and expressing the mitigation burden for the soundproofing of dwellings.</p> <p>Recommendations: The noise analysis in the FEIS should be improved. We recommend that the following be included:</p> <ul style="list-style-type: none"> <li>• Conduct supplemental noise analysis to disclose indoor speech interference and indoor sleep disturbance for the 8 week training period, such as was performed in the Marine Corps' West Coast Basing of the F-35B EIS. Discuss sleep disturbance results with reference to the World Health Organization's guidance that equivalent sound pressure level should not exceed 30 dBA indoors for continuous noise, and 45 dB SEL for single events if negative effects on sleep are to be avoided.</li> </ul>	The noise analysis was revised based on input from the public, Headquarters Air Force, AFCEC, and FAA. A more thorough land use compatibility assessment including supplement noise analysis was completed based on these revisions to the noise analysis in Sections 4.1 and 4.10. The USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available to the public.	Postal Mail
A20	Noise	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director	N/A	N/A	N/A	The DEIS predicts noise exposures at and above DNL 75 dB, with some above DNL 80 dB, yet there was no analysis to assess the potential for hearing loss. We believe that when noise-sensitive receptors are identified in the 75 dB+ noise contour, risk of hearing loss should be evaluated. DoD policy in "Methodology for Assessing Hearing Loss Risk	The noise analysis was revised based on input from the public, Headquarters Air Force, AFCEC, and FAA. A more thorough land use compatibility assessment including potential hearing loss was completed based on these revisions to the noise analysis in	Postal Mail

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		Communities and Ecosystems Division				and Impacts in DoD Environmental Impact Analysis" applies whenever the 80 dB DNL contour extends into populated areas off base and requires that hearing risk loss be estimated for this population. Recommendations: The noise analysis in the FEIS should be improved. We recommend that the following be included: <ul style="list-style-type: none"> <li>Estimate potential for hearing loss for noise exposures at DNL 75 dB and above. Provide single event analysis (e.g. SEL metrics) for Alternative 1, as is provided for Alternative 2, and include this information in the hearing loss analysis. Discuss results in terms of the World Health Organization's 120 dB guideline threshold for hearing impairment in children. It may be helpful to discuss the frequency of expected noise from the project in terms of hearing loss. Noise-induced hearing impairment occurs predominantly in the higher frequency range of 3,000–6,000 Hz, with the largest effect at 4,000 Hz.</li> </ul>	Sections 4.1 and 4.10. The USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	
A21	Noise: Cumulative	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director Communities and Ecosystems Division	N/A	N/A	N/A	The DEIS acknowledges that noise impacts on noise-sensitive receptors during implementation of the preferred alternative would be significant (p. ES-12); however, it does not acknowledge cumulative noise impacts. Table ES-3 on p. ES-22 does not address cumulative noise impacts from implementation of the preferred alternative nor does the text on page 5-9 address cumulative operational noise impacts. Instead, the DEIS states that no cumulative impacts would be expected on the noise environment due to air operations, because the air training operations were analyzed in the MIRC EIS, for which a Record of Decision was issued. The MIRC EIS, however, did not include training use of the Saipan International Airport, so the impact assessment for the aircraft operations in the MIRC EIS was for noise receptors on Guam. Noise impact assessments are necessarily localized and must involve the actual receptors that would be impacted under the Proposed Action. Cumulative noise impact assessments evaluate project impacts to these receptors in combination with noise from other past, present and reasonably foreseeable future actions.  Recommendation: Conduct an impact assessment for noise impacts that occur incrementally from the proposed action when added to other past, present, and reasonably foreseeable future actions regardless of what agency	No cumulative noise impacts at the Saipan Airport are expected because there are no past, present, or reasonably foreseeable actions with respect to additional flight operations planned for the Saipan Airport. Construction projects are planned and are analyzed in the EIS; however, at this time, many of these projects do not have definitive locations or construction dates. Additionally, The USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	Postal Mail

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						(Federal or non-Federal) or person undertakes such other actions (40 CFR 1508.7).		
A22	Noise: Mitigation	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director Communities and Ecosystems Division	N/A	N/A	N/A	The DEIS does not discuss noise mitigation, and suggests that it is not clear that noise mitigation is necessary. EPA does not believe that such a conclusion is supported by the DEIS, and recommends that the Air Force reconsider this matter and evaluate possible changes to the preferred alternative or a new alternative that could reduce the noise impacts.	The USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public. BMPs and mitigation measures are provided in Section 4.16 of the EIS.	Postal Mail
A23	Noise: Mitigation	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director Communities and Ecosystems Division				As mentioned, no mitigation measures for noise are identified despite the very high increases in noise that would occur during 2 months of the year. We understand that there is no existing Department of Defense program that permits appropriated funding for off-base sound attenuation; however, since GSN is a civilian airport, it is eligible to apply for financial assistance from the FAA Part 150 program for noise mitigation. This would require updating the Noise Exposure Maps and the Noise Compatibility Plan, as well as matching funds from the airport. According to the DEIS, the Department of Defense will need to negotiate space for military improvements with the authority running the airport, and any additional costs for construction and ongoing maintenance to the operating authority would be addressed in the mutual use agreement (p. 1-14). Recommendations: Identify mitigation measures for noise impacts in the FEIS per 40 CFR 1502.16(h). We recommend that the Air Force work with the airport authority to ensure that the mutual use agreement includes sufficient financial contributions from DoD for ongoing maintenance so the authority can afford to pursue FAA Part 150 program funding.	The USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public. BMPs and mitigation measures are provided in Section 4.16 of the EIS.	Postal Mail
A24	Proposed Action	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director	N/A	N/A	N/A	The project description and rationale for the alternatives are not clear. The DEIS states that the KC-135 Stratotanker aircraft is being used as the design aircraft for cargo and tanker aircraft in the EIS and that the KC-135 dimensions will be used to develop space requirements for airport facilities and infrastructure under the Proposed Action (p. 2-	12 KC-135s is an operational unit within the USAF commonly known as a squadron. USAF planners are required to plan activities using USAF operational units; therefore, under the Proposed Action, 12 tankers is a standard squadron package for	Postal Mail

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		Communities and Ecosystems Division				<p>2). The Proposed Action, whether taking place at Saipan International Airport (GSN)(Alternative 1) or Tinian International Airport (Alternative 2), was devised to accommodate 12 KC-135 aircraft “to meet the purpose and need of the Proposed Action”; however the DEIS does not state why 12 aircraft were chosen or how this number was determined. This number is important because it is used to scale the number of fighter jets that would be used during training (a size ratio of 1 to 2 was assumed for cargo planes to fighter jets, therefore the Proposed Action includes the use of 24 fighter jets) and it is these that are the source of significant noise impacts.</p> <p>Recommendation: The FEIS should explain why 12 KC-135s are needed to meet the purpose and need of the Proposed Action and how this was determined. Discuss the nature of the different scenarios for the reader. For example, explain situations that would require both military training and humanitarian assistance simultaneously at a divert airport (medium scenario)</p>	larger aircraft. Additionally, the ISR/Strike capability EIS proposed to establish 12 KC-135 aircraft in the region at Andersen AFB. Therefore, should Andersen AFB be closed for standard operations as described in the Purpose and Need, 12 KC-135s could require a divert operating location.	
A25	Proposed Action	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director Communities and Ecosystems Division	N/A	N/A	N/A	<p>For the analysis of the implementation phase, the DEIS assumes that any mix of joint fighter, cargo, and tanker aircraft, not to exceed the design capabilities of the airport, could be diverted to or exercised from the airport selected. Representative scenarios of possible aircraft mixes are used to analyze potential environmental consequences. The “low scenario” consists of 12 KC-135’s, the “medium scenario” of 6 KC-135’s and 12 fighter jets, and the “high scenario” consists of 24 fighter jets. The DEIS also includes 3 runway options for the 2 alternative airport sites: Runway Option A - a runway extension to 10,000 ft (the optimum runway length for the KC-135); Runway Option B - a runway extension less than 10,000 ft; and Runway Option C - no runway extension. The DEIS states that a shorter runway (i.e., no extension) can accommodate KC-135’s and “the location could still support divert, exercise, and humanitarian relief activities” but each KC-135 would need to operate at a reduced load capacity (p. 2-2). Thus, according to the DEIS, operating at a reduced load capacity would meet the purpose and need for the project.</p> <p>Recommendation: Since the DEIS indicates that 12 KC-135’s operating at a reduced capacity on a shorter runway would meet the purpose and need for the proposed project,</p>	12 KC-135s are required under the Proposed Action because this number of tankers is a standard squadron package. Based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations. The USAF proposes to only operate up to 4 KC-135 aircraft during military exercises.	Postal Mail

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						it is reasonable to consider whether some lesser number of KC- 135s operating at full capacity on a longer runway would also meet the purpose and need. If it would, an alternative with a design capability for fewer KC-135's (and, consequently, fewer fighter jets) should be evaluated in the FEIS. If it would not, the FEIS should explain why. Additionally, we recommend that the Air Force assess whether an alternative that would not utilize the medium and/or high scenario at Saipan International Airport would meet the purpose and need.		
A26	Proposed Action Natural Resources	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director Communities and Ecosystems Division	4-59	N/A	N/A	Preferred Alternative 1 would remove 14.3 acres of forest, primarily for the east parking apron and ramp and the bulk fuel storage (p. 4-59). The maintenance facility will result in removal of just under an acre. Based on Figure 2.3-6, if commercial lodging is utilized for billeting and the BEAR site is not needed, space may be available for the fuel tanks and hydrant system at this location to avoid removal of up to 5 acres of forest. Additionally, based on Figure 2.3-5, it appears there could be non-forested space across the road from the proposed maintenance facility that could be utilized for this structure.  Recommendation: Explore and discuss in the FEIS whether forest removal has been minimized by site planning, including the possible adjustments to facility locations mentioned above.	The USAF has presented modified alternatives in the Revised DEIS to minimize impacts to vegetation and potential habitat. See Section 4.6 for revisions.	Postal Mail
A27	Proposed Action Noise: Mitigation	Agency Stakeholder EPA Region 9 Enrique Manzanilla, Director Communities and Ecosystems Division	N/A	N/A	N/A	The DEIS implies that a design capability less than that proposed, i.e., operation of the same number of aircraft at a reduced load capacity, would meet the purpose and need for the proposed project. EPA recommends, in addition to an improved noise analysis, that alternatives be explored that would improve the airport to a comparable design capability by reducing the number of planes rather than the load capacity of each plane. We also request an evaluation as to whether an alternative that would operate under only the "low scenario" (no fighter jets) would meet the purpose and need. In all cases, noise mitigation measures should be incorporated into the Proposed Action.	12 KC-135s are required under the Proposed Action because this number of tankers is a standard squadron package. Based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations	Postal Mail
B27	Marine Bio	Agency Stakeholder NOAA NMFS Protected	3-61		3.7	The DEIS states in Section 3.7, Marine Biological Resources, that both humpback whales and sperm whales have been sighted off of Saipan, and that humpback whales may migrate to waters off of Saipan for breeding purposes.	Text revised in Section 4.7 to be consistent with the list provided by NMFS.	Postal Mail

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		Resources Division Alecia VanAtta				It also notes that sperm whales have been sighted near the island of Tinian (DEIS pg. 3-61). ESA-listed species under NMFS jurisdiction that are known or expected to occur in waters of the Mariana Archipelago include green sea turtles ( <i>Chelonia mydas</i> ), hawks bill sea turtles ( <i>Eretmochelys imbricata</i> ), leatherback sea turtles ( <i>Dermochelys coriacea</i> ), and olive ridley sea turtles ( <i>Lepidochelys olivacea</i> ), as well as blue whales ( <i>Balaenoptera musculus</i> ), fin whales ( <i>Balaenoptera physalus</i> ), humpback whales ( <i>Megaptera novaeangliae</i> ), sei whales ( <i>Balaenoptera borealis</i> ), and sperm whales ( <i>Physeter macrocephalus</i> ). Numerous other marine mammals also occur within the archipelago and are protected under the MMPA (see attached list).		
B28	Marine Bio	Agency Stakeholder NOAA NMFS Protected Resources Division Alecia VanAtta	N/A	N/A	N/A	The DEIS states that fuel would be shipped to the harbors to support the proposed increase in military air traffic; however, it does not include an analysis of the impacts of increased vessel traffic (to supply fuel or any other supplies) on protected marine species or their habitats. Instead, the effects section of the DEIS focuses on construction and operations at the airfields. The EIS should consider the potential impacts of increased shipping to the selected island to supply the construction and to provide the extra fuel and military supplies that would be required in support of the proposed action, as well as any other expected marine activities.	Impacts from vessel traffic are not expected as it is anticipated that there would be minimal increase in maritime traffic beyond traditional maritime traffic levels. Recent economic downturn in the CNMI as a result of the closure of the garment industry has reduced ship movements into Saipan. In like manner, Tinian has had higher maritime traffic levels in the recent past when Tinian was used as trans-shipping port for the fishing industry. After the initial filling of the fuel storage tanks at either location, the periodic arrival of tankers for replenishment should be within existing levels of maritime traffic. The text was revised to clarify that there would be no impacts on marine species or their habitats because all fuel shipments would occur through the existing fuel supply chain. No increase beyond existing vessel traffic would occur under the Proposed Action. Text was revised in the EIS in Section 4.7 and stated in a letter to NOAA. After the Draft EIS was released, the USAF received concurrence from NMFS that the Proposed Action is not likely to adversely affect marine species.	Postal Mail
B29	Marine Bio	Agency Stakeholder	N/A	N/A	N/A	The DEIS states Tinian Harbor supports limited shipping of shallow draft vessels and has a limited capability to accept	No improvements are proposed for the Tinian harbor. The harbor can currently	Postal Mail

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		NOAA NMFS Protected Resources Division Alecia VanAtta				fuel shipments (Section 2.2.2.3 pg. 2-10). Based on this statement it appears that harbor improvements would be required to accommodate the expected shipping of shallow draft vessels. As such, the Tinian alternative should include an assessment of any required harbor work	accept shallow draft vessels and it is proposed that fuel be delivered to Tinian using the existing fuel supply chain using these shallow draft vessels. As stated in Section 2.4.2.2 "Jet fuel would be received at the current port in Tinian from a shallow draft tanker; shallow draft tankers currently dock at the Tinian port and it is assumed that no improvements to the harbor would need to be made."	
B30	Marine Bio: Cumulative	Agency Stakeholder NOAA NMFS Protected Resources Division Alecia VanAtta	4-68, 4-69	9 and 21, 5 and 16	N/A	We recognize that your agency has made a preliminary determination in the DEIS that the proposed action may affect, but is not likely to adversely affect, protected marine species (DEIS pg. 4-68 lines 9 and 21; pg. 4-69 lines 5 and 16). However, the DEIS is currently insufficient to justify that determination, and we're recommending that consideration be made to the additional points described above to insure a full assessment on the potential impacts of the project regarding sea turtles and marine mammals.	Because there will be no appreciable increase in shipping based upon the projected fuel requirements, or modifications required to harbors for this project, the EIS addresses all potential impacts on listed marine species including sea turtles and marine mammals. Any impacts on marine biology would be analyzed under the training which is covered under the MIRC letter of authorization and the MITT EIS and associated Biological Opinion completed in July 2015. Appendix B of the EIS contains the correspondence between the USAF and NMFS with regard to the Not Likely to Adversely Affect determination	Postal Mail
B31	Natural Resources	Agency Stakeholder NOAA NMFS Habitat Conservation Division Gerald W. Davis	N/A	N/A	N/A	According to the DEIS, the GSN Alternative will increase impervious surfaces by up to 2,392,200 square feet and the TNI Alternative will increase impervious surfaces by up to 4,090,800 square feet. Both alternatives are located within the coastal zone, in close proximity to nearshore marine resources, including Essential Fish Habitat (EFH). Previous large scale clearing and grading projects in the Mariana Islands have resulted in significant impacts to surface and nearshore water quality, EFH, and coral reefs. The DEIS states that: "With proper sediment and erosion controls and storm water management BMPs in place, it is assumed that storm water runoff during construction activities would result in short-term, indirect, minor, adverse impacts on water quality in down gradient surface water bodies and nearshore waters." (p. 4-54 lines 13-16) However, the DEIS	As discussed in Section 4.5, DOD policies, compliant with Federal and CNMI regulations, will be followed to minimize erosion and sedimentation and to manage storm water runoff. By implementing those policies, adverse impacts of sedimentation and runoff would be minor. Text was added to Section 4.7 (Marine Biological Resources) acknowledging that the USAF concludes that there would be no adverse effects on essential fish habitat. Additionally, text was revised to provide a reference back to the Water Resources section which also discusses this topic. Additionally, The USAF has revised its	Postal Mail

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						provides limited analysis on BMP implementation, maintenance and effectiveness and does not evaluate the potential impacts of these activities on EFH in the affected nearshore waters. The Magnuson-Stevens Fishery Conservation and Management Act (MSA), (16 USC § 1855(b)(2) requires federal agencies to consult with NMFS on "any action authorized, funded, or undertaken, or proposed to be authorized, funded or undertaken, by such agency that may adversely affect any essential fish habitat identified under the Act." Further, NMFS is required to provide conservation recommendations for actions that would adversely affect EFH. 50 CFR 600.905 outlines the general EFH consultation procedure. We recommend that the USAF evaluate potential impacts to EFH associated with this proposed action to determine whether consultation under MSA is necessary for this project.	proposal based on agency and public comments on the Draft EIS. Due to the reduced scope of the revised proposal, the USAF is providing an additional opportunity to comment on the proposed action and alternatives by making a Revised Draft EIS available to agencies and the public.	
B32	Natural Resources	Agency Stakeholder NOAA NMFS Habitat Conservation Division Gerald W. Davis	N/A	N/A	N/A	Impacts to water quality may also affect corals petitioned for listing under the Endangered Species Act (ESA). Forty of the eighty-two candidate species are found in the Mariana Islands (see attached list). A number of these species have been observed in close proximity to the airports and harbors in both Saipan and Tinian. A decision on listing is expected in late 2012. Listing of the corals under the ESA might necessitate a Section 7 consultation for corals. More information on this process is available at: <a href="http://www.fpir.noaa.gov/PRD/prd_coral.html">http://www.fpir.noaa.gov/PRD/prd_coral.html</a>	Text was added in Section 4.7 to clarify that the USAF concludes that construction and operations will not adversely affect coral species, including candidate species for listing under the Endangered Species Act.	Postal Mail
B33	Natural Resources	Agency Stakeholder NOAA NMFS Habitat Conservation Division Gerald W. Davis	N/A	N/A	N/A	During the scoping meetings, it was noted that significant harbor improvements may be required to support the development, enhancement, and operations of a divert airfield location. Should the USAF require upgrades at either Saipan Harbor or Tinian Harbor to accommodate the delivery and handling of jet fuel or other supplies, the USAF may need to initiate consultation with NMFS under the Fish and Wildlife Coordination Act and MSA.	No improvements are proposed for the Tinian or Saipan harbor. The harbor can currently accept shallow draft vessels and it is proposed that fuel be delivered to Tinian using the existing fuel supply chain using these shallow draft vessels. As stated in Section 2.4.2.2 "Jet fuel would be received at the current port in Tinian from a shallow draft tanker; shallow draft tankers currently dock at the Tinian port and it is assumed that no improvements to the harbor would need to be made." Text was clarified in the EIS in Section 4.7.	Postal Mail
C31	Natural Resources	Agency Stakeholder	N/A	N/A	N/A	The NPS is concerned that increased flights from Guam and other areas can introduce invasive species to Saipan (or	As described in Section 4.6, the USAF will implement invasive species control and	Postal Mail

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		NPS				Tinian), especially the brown tree snake. Additional inspection resources, quarantine areas, personnel, training, and detection dogs will all be needed. The ability to have 100% inspection and control over all Divert traffic landing on Saipan will be necessary and the EIS should address how the Divert procedures will conform to regional Biosecurity Plans and requirements.	interdiction measures. The USAF will follow the requirements outlined in the Biological Opinion contained in Appendix B of the EIS.	
C32	Cultural Resources	Agency Stakeholder NPS	N/A	N/A	N/A	We have noted the potential for adverse effects to the Landing Beaches, Aslito/Isley Field, and Marpi Point National Historic Landmark District (NHL) on Saipan, specifically the Aslito/Isley Field Historic District section of the NHL. On June 17, 2012, NPS staff visited the proposed area for the Saipan alternative with HDR Environmental, Operations and Construction, Inc. (HDR) archeological staff. This field visit was prompted by a draft Phase I Cultural Resources Survey Report (April 2012) prepared by HDR for the Saipan alternative for the proposed project. This field visit was very informative and we enjoyed the opportunity to discuss the details of the cultural field work. During the field visit, we discussed the locations within the project area that were investigated for cultural resources during the survey and what resources were identified. We visited a Japanese bunker that had not been previously identified. HDR had sent a letter to the Historic Preservation Officer (HPO) of the Commonwealth of the Northern Mariana Islands (CNMI) and NPS asking for "concurrence" on the determinations of eligibility to the National Register of Historic Places (NRHP) that was included in the Phase I report. This included the recommendation that some features within the NHL are ineligible for the NRHP. There was some confusion as to what HDR was asking for in regards to concurrence. We explained that the only way an NHL designation can be modified is through the NHL amendment process which includes a review and acceptance by the National Historic Landmarks Committee of the National Park System Advisory Board. Please refer to our detailed comments in the letter dated June 25, 2012 from Dr. David Louter to Mr. William Grannis (see Attachment).	Many of these issues have also been raised through the Section 106 process. Consultations were initiated on February 1, 2012 by Headquarters Pacific Air Forces (PACAF) with the Commonwealth of the Northern Mariana Islands (CNMI) State Historic Preservation Officer (SHPO). These consultations resulted in a draft Memorandum of Agreement (MOA) developed by the consulting parties. However, due to concerns from the newly established CNMI administration, the MOA was not finalized. Since that time, PACAF has revised the scope of the Undertaking in coordination with CNMI officials. Now, PACAF seeks to complete the Section 106 process and parallel procedures under the National Environmental Policy Act (NEPA) for an Environmental Impact Statement (EIS). In this regard, Pacific Air Forces (PACAF) worked to redefine the Area of Potential Effect (APE) to address the issue of the National Historic Landmark (NHL) as a whole and to make a formal finding of effect for which concurrence was requested. The Section 106 process took place as laid out in 36 Code of Federal Regulations (CFR) 800. This information has been clarified in the Revised Draft EIS, specifically in Sections 3.8 and 4.8, and all documentation in support of the Section 106 consultation process is contained in	Postal Mail

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						<p>On June 22, 2012, a team of HDR and Air Force representatives provided the NPS with a presentation about the DEIS. From that discussion, we understand the analyses required under the National Environmental Protection Act (NEPA) and NHPA are being combined. We would like to reiterate the need to invite all interested parties to participate in meetings that are clearly advertised as Section 106 consultation.</p> <p>In general, the Section 106 process should be followed to determine the effects, if any, to historic properties within the project area. To date, it appears that a letter initiating Section 106 was sent to the CNMI HPO, the NPS and the Advisory Council on Historic Preservation (ACHP) (February 2012). Additionally, a draft Phase I cultural resources survey was prepared for the Aslito/Isley Field area. This report identified cultural resources within proposed areas of ground disturbance within the project area for Alternative 1 in the DEIS.</p>	Appendix D of the EIS.	
C33	Cultural Resources	Agency Stakeholder NPS	3-62	10-11	N/A	<p>The description of the study area for cultural resources needs to be better defined. The Area of Potential Effect (APE) as defined in 36 CFR 800.16( d) "geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist" should be included. The NPS suggests the inclusion of a map showing the APE for the proposed project.</p>	<p>PACAF has revised the scope of the Undertaking in coordination with CNMI officials. Now, PACAF seeks to complete the Section 106 process and parallel procedures under the National Environmental Policy Act (NEPA) for an Environmental Impact Statement (EIS). In this regard, Pacific Air Forces (PACAF) worked to redefine the Area of Potential Effect (APE) and to make a formal finding of effect for which concurrence was requested. The Section 106 process took place as laid out in 36 Code of Federal Regulations (CFR) 800. This information has been clarified in the Revised Draft EIS, specifically in Sections 3.8 and 4.8, and all documentation in support of the Section 106 consultation process is contained in Appendix D of the EIS.</p>	Postal Mail
C34	Cultural Resources	Agency Stakeholder NPS	3-68	14, 17	N/A	<p>These sentences reference an "APE". The APE has not been previously defined in the DEIS. The Area of Potential Effect for each alternative should be defined in the Affected Environment section of the DEIS; and if there is variance</p>	<p>PACAF has revised the scope of the Undertaking in coordination with CNMI officials. Now, PACAF seeks to complete the Section 106 process and parallel procedures under the National</p>	Postal Mail

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						between the alternatives, then individual APE maps should be included	Environmental Policy Act (NEPA) for an Environmental Impact Statement (EIS). In this regard, Pacific Air Forces (PACAF) worked to redefine the Area of Potential Effect (APE) and to make a formal finding of effect for which concurrence was requested. This information has been clarified in the Revised Draft EIS, specifically in Sections 3.8 and 4.8, which include the revised APEs. All documentation in support of the Section 106 consultation process is contained in Appendix D of the EIS.	
C35	Cultural Resources	Agency Stakeholder NPS	4-69	Paragraph 2	N/A	This paragraph does not adequately define the Section 106 process requirements as outlined in 36 CFR 800. For example, it states that consultation will only be done if adverse effects to cultural resources are determined. Through the Section 106 process, effects to resources are determined through the consultation process.	The text in Section 4.8 of the EIS was revised per comment to correspond with 36 CFR 800.	Postal Mail
C36	Cultural Resources	Agency Stakeholder NPS	N/A	N/A	4.8.1	There is no mention of the Phase I Cultural Resources Survey (2012) that was prepared by HDR for the Aslito/Isley Field alternative. Suggest referencing the findings from the report.	The report is discussed in the Final EIS in Sections 3.8 and 4.8 and is included in the References section of the document.	Postal Mail
C37	Cultural Resources	Agency Stakeholder NPS	N/A	N/A	4.8.1	The area of the proposed associated fuel tanks located at the Port of Saipan is not addressed and should be.	The area at the Port of Saipan is included in the APE maps and discussion and is addressed in the EIS in Sections 3.8 and 4.8.	Postal Mail
C38	Cultural Resources	Agency Stakeholder NPS	N/A	N/A	4.8.1	If possible, the Section 106 finding of effect should be included with the NEPA impact determination. For example, a long-term major impact would be significant under NEP A as well as an adverse effect under Section 106.	A finding of effect was developed through the Section 106 consultation process and is included in the Revised Draft EIS in Section 4.8.	Postal Mail
C39	Cultural Resources	Agency Stakeholder NPS	N/A	32	4.8.1	While the adverse impacts could impact the historic fabric, a better way to state this would be that there could be adverse impacts to the National Historic Landmark historic properties.	Text in Section 4.8 has been revised per the modified Undertaking , APE, and FOE.	Postal Mail
C40	Cultural Resources	Agency Stakeholder NPS	N/A	33	4.8.1	Section 106 consultation as outlined in 36 CFR 800.2 needs to be done with all interested parties - not just the HPO and NPS. Additionally, because the proposed project area is within a National Historic Landmark the ACHP needs to be	PACAF began consultations with the ACHP after determining that there may be effects on the National Historic Landmark. PACAF also identified additional interested	Postal Mail

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						consulted.	parties for consultation. Text has been revised in the EIS in Section 4.8 for clarification. All documentation supporting Section 106 is contained in Appendix D of the EIS.	
C41	Cultural Resources	Agency Stakeholder NPS	N/A	34	4.8.1	Likewise, the determination of impacts to resources and identification of appropriate mitigations should also be done in consultation with all interested parties.	PACAF has revised the scope of the Undertaking in coordination with CNMI officials. Now, PACAF seeks to complete the Section 106 process and parallel procedures under the National Environmental Policy Act (NEPA) for an Environmental Impact Statement (EIS). In this regard, Pacific Air Forces (PACAF) worked with the consulting parties to redefine the Area of Potential Effect (APE) and to make a formal finding of effect for which concurrence was requested. The Section 106 process took place as laid out in 36 Code of Federal Regulations (CFR) 800. This information has been clarified in the Revised Draft EIS, specifically in Sections 3.8 and 4.8, and all documentation in support of the Section 106 consultation process is contained in Appendix D of the EIS.	Postal Mail
C42	Cultural Resources	Agency Stakeholder NPS		Paragraph 1	4.8.1.1	Replace the term historic fabric with historic property(ies) where appropriate.	Text revised per comment in Section 4.8.	Postal Mail
C43	Cultural Resources	Agency Stakeholder NPS		37	4.8.2	Section 106 consultation needs to be conducted with all interested parties to identify the APE, resources within the APE and potential impacts to those resources from project implementation. Likewise, the determination of impacts to resources and identification of appropriate mitigations should also be done in consultation with all interested parties.	PACAF has revised the scope of the Undertaking in coordination with CNMI officials. In this regard, Pacific Air Forces (PACAF) worked with the consulting parties to redefine the Area of Potential Effect (APE) and to make a formal finding of effect for which concurrence was requested. The Section 106 process took place as laid out in 36 Code of Federal Regulations (CFR) 800. This information has been clarified in the Revised Draft EIS, specifically in Sections 3.8 and 4.8, and all documentation in support of the Section	Postal Mail

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							106 consultation process is contained in Appendix D of the EIS. (CFR) 800. This information has been clarified in the Revised Draft EIS, specifically in Sections 3.8 and 4.8, and all documentation in support of the Section 106 consultation process is contained in Appendix D of the EIS.	
C44	Cultural Resources	Agency Stakeholder NPS			4.8.2	If possible, the Section 106 finding of effect should be included with the NEPA impact determination. For example, a long-term major impact would be significant under NEPA as well as an adverse effect under Section 106.	PACAF has revised the scope of the Undertaking in coordination with CNMI officials. In this regard, Pacific Air Forces (PACAF) worked with the consulting parties to redefine the Area of Potential Effect (APE) and to make a formal finding of effect for which concurrence was requested. The Section 106 process took place as laid out in 36 Code of Federal Regulations (CFR) 800. This information has been clarified in the Revised Draft EIS, specifically in Sections 3.8 and 4.8, and all documentation in support of the Section 106 consultation process is contained in Appendix D of the EIS.	Postal Mail
C45	Cultural Resources	Agency Stakeholder NPS			5.3.8	In general, the impact assessment to cultural resources from cumulative impacts is lacking a discussion on past, present and reasonably foreseeable future actions when added to the proposed action. The discussion in the DEIS seems to further address impacts to cultural resources from the proposed action only.	Text revised per comment in Section 5.3.8.	Postal Mail
C46	Cultural Resources	Agency Stakeholder NPS		21	5.3.8	The long term impacts should be defined using NEPA terminology - long-term, direct/indirect, adverse, etc. As much as possible these should be factually described rather than qualitatively labeled.	Text revised per comment in Section 5.3.8.	Postal Mail
C47	Cultural Resources	Agency Stakeholder NPS		22	5.3.8	Historic fabric should be changed to historic properties	Text revised per comment in Section 5.3.8.	Postal Mail
C48	Cultural Resources	Agency Stakeholder NPS			5.6	Given that both Alternatives 1 and 2 had moderate to major adverse impacts to historic properties, the NPS suggests that some cultural resources may have irreversible impacts or be lost.	PACAF is consulting with all interested parties under Section 106 consultation process to avoid or mitigate irreversible impacts and complete loss of cultural resources. All documentation supporting	Postal Mail

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							Section 106 consultation is provided in Appendix D of the EIS.	
C49	Cultural Resources: Mitigation	Agency Stakeholder NPS	N/A	N/A	N/A	Because there would be adverse impacts to cultural resources there will need to be a discussion of mitigation measures to avoid or minimize these impacts.	PACAF is consulting with all interested parties to determine effects and develop appropriate mitigation under Section 106. The status of these ongoing consultations are included in the EIS in Section 4.8 and Appendix D.	Postal Mail
D50	Administrative	Agency Stakeholder Guam DAWR Mariquita F. Taitague	N/A	N/A	N/A	The Department of Agriculture's Division of Aquatic and Wildlife Resources (DAWR) received the Draft Environmental Impact Statement (EIS) for the proposed Divert Activities and Exercises, Guam and Commonwealth of the Northern Mariana Islands (CNMI) for review and comments. The letter acknowledged by Maj. Gen. Russell J. Handy, Director of Operations, Plans, Requirements and Programs, did not state when comments are due.	Comment noted.	Postal Mail
D51	Natural Resources	Agency Stakeholder Guam DAWR Mariquita F. Taitague	N/A	N/A	N/A	The Draft EIS addressed environmental issues as required through the NEPA process. However, prior to the release of the Draft EIS, the Nightingale reed warbler ( <i>Acrocephalus luscini</i> ) study was not completed. The analysis of the reed warbler study is very important to be able to provide more constructive comments regarding the protection of this endangered species.	Results of the surveys and consultations were not provided in the Draft EIS because consultations were not complete at the time the Draft EIS was published. The Air Force wanted to seek public and stakeholder input on the Proposed Action and alternatives during scoping before initiating consultation. Therefore, the consultation process was an ongoing process and information on surveys and input from USFWS are included in the Revised Draft EIS. Consultation was completed prior to publication of the Revised Draft EIS and the Biological Opinion is included in Appendix B. The USAF is currently also conducting Section 7 consultation for the Proposed Action on Tinian.	Postal Mail
E52	Air Quality	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	Observation/Issue: Impacts on air quality are not adequately addressed to the level of analysis required by federal and local regulations. The Impacts resulting from both Alternative 1 and 2 are identified as being equivalent; however, the Existing Conditions of each are identified as being unclassifiable.	The Revised Draft EIS is compliant with both Federal and local regulations. The existing condition of "Unclassifiable" means the same as an area being in attainment with ambient air quality standards, i.e., pollutant concentrations	Postal Mail

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						Comment: Address and consider in more detail in the FEIS the level of analysis required by federal and local air quality regulations for each alternative.	below the standards. Therefore, General Conformity regulations for Federal actions do not apply. Although not required, the analysis was taken a step further to compare emissions to attainment area thresholds and demonstrated that they were below those thresholds. Note that the Revised Draft is a tool to determine environmental impacts in the planning stages. Local air quality permits could be required when the projects are developed further and are submitted for actual construction. At that time, further analysis would be conducted to obtain any needed air permits, if required.	
E53	Air Quality	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	Observation/Issue: The EIS states that CNMI DEQ requires all air permit applications to include dispersion modeling for comparison against NAAQS for compliance, The analysis does not appear to include air quality of pollutant dispersion modeling, thus does not adequately analyze and address the concern of localized air quality impacts. Comment: Address and consider in more detail air quality of pollutant dispersion modeling required by NAAQS in the FEIS.	Dispersion modeling is required when a project is being submitted for its air quality construction permit. Each of the submitted projects would file separately for an air quality construction permit.	Postal Mail
E54	Air Quality	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	Observation/Issue: The proximity of the nearest residential population should be taken into consideration as a result of the potential for impaired local air quality and its effect on economically disadvantaged or health impaired communities. The DEIS inadequately addresses this issue. Comment: Prior to finalizing the EIS and making a determination of the preferred alternative, a more thorough technical evaluation and air quality modeling is needed to understand the localized impacts due to proposed operations as well as fuel storage. Please document the results in the FEIS.	Localized impacts on disadvantaged or health-impaired communities are not expected. The projects are proposed in locations where existing operations are of a similar nature (i.e. flight operations at an existing airport).	Postal Mail
E55	Cultural Resources	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	Observation/Issue: The proposed action for Alternative 1 (Saipan) would result in major adverse effects on Saipan International Airport, which is a National Historic Landmark. The DEIS states that the Section 106 consultation is ongoing. The identification of mitigation "if any" is needed to provide a full understanding of potential impacts on these important cultural resources on Saipan.	PACAF is consulting with all interested parties to determine effects and develop appropriate mitigation under Section 106. The results of these ongoing consultations are included in the EIS in Section 4.8, and all documentation supporting the Section 106 consultations is included in Appendix D of the Final EIS.	Postal Mail

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E56	Cultural Resources	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	Observation/Issue: The Section 106 consultation should be concluded prior to determination of final EIS preferred alternative selection.	There is no legal requirement that states Section 106 must be completed before a preferred alternative is identified. CEQ regulations require the section of the EIS on alternatives to “identify the agency’s preferred alternative or alternatives if one or more exists, in the draft statement, and identify such alternative in the final statement...” However, the EIS has been revised in coordination in coordination with CNMI officials and presents modified alternatives and a preferred alternative is no longer identified.	Postal Mail
E57	Cultural Resources	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)		5-17		Observation/Issue: The proposed parking aprons along the north side of GSN runways and the proposed BEAR-kit site at the existing soccer field between Flame Tree and Airport Roads. The Impacted Resources are concrete air raid bunkers associated with the Japanese military build-up before World War II and defense during World War II. Six such structures lie in very close proximity to the proposed parking aprons while two lie at one edge of the proposed BEAR-kit site. While direct avoidance is planned, the structures are susceptible to secondary impacts from vibration-related deterioration due to heavy traffic. In addition the BEAR-kit could face an increased risk of vandalism from military and civilian personnel. Comment: Please confirm that the Record of Decision (ROD) will include language stating that the DoD shall provide information such as pamphlets or a guided tour to military personnel prior to Divert Activity Exercise that indicate the significance of these historic landmarks.	PACAF is consulting with all interested parties to determine effects to historic properties and develop appropriate mitigation under Section 106. The results of these ongoing consultations are included in the EIS in Section 4.8, and all documentation supporting the Section 106 consultations is included in Appendix D. The ROD will either include all mitigation measures agreed upon during Section 106 consultation if it has been completed; or will include a statement that notes that the action will not be implemented until Section 106 consultation is complete and mitigation measures have been identified and agreed upon..	Postal Mail
E58	Cultural Resources	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)		3-63		Observation/Issue: The Isley Field Historic District contains historic artifacts and features associated with the construction of Japanese Aslito Field beginning in 1934. Comment: Using alternative 2 (Tinian) would eliminate any concerns with disturbing cultural artifacts on Saipan.	Comment noted. Because of the NHL, cultural resources at the Saipan alternative are better known and more accurately recorded. Using Tinian would not necessarily eliminate any concerns with disturbing cultural artifacts as Tinian also has many of the same historic and cultural features that Saipan has.	Postal Mail
E59	Cultural Resources	Political Stakeholder Government of		4-71		Observation/Issue: Possible major, direct, adverse impacts on cultural resources during implementation include those resulting from increased traffic, partial destruction or	Because of the NHL, cultural resources at the Saipan alternative are better known and more accurately recorded. Using Tinian	Postal Mail

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		CNMI (Submitted by Lt. Gov. Inos)				vandalism, looting, and other effects resulting from increased use of the area. Such impacts could diminish or destroy the overall integrity of these resources by affecting design, materials, or workmanship or structure and the location of archaeological materials in the event of looting. Large encampments of personnel or storage of material on aprons and runways would have detrimental effects on setting, feeling, and association. Comment: Alternative 2, (Tinian) has significantly fewer adverse impacts.	would not necessarily eliminate any concerns with disturbing cultural artifacts as Tinian also has many of the same historic and cultural features that Saipan has.	
E60	General	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	The Commonwealth of the Northern Mariana Islands (CNMI) extends our appreciation to the United States Air Force for evaluating and considering Saipan and Tinian; for affording us the opportunity to express our thoughts on this critical action; and for the CNMI to provide the location for the Divert Activities and Exercises initiative. We will continue to support and serve our Nation and the Department of Defense. The CNMI has a date with destiny and is ready to respond as the focus shifts to the Asia Pacific region.	Comment noted.	Postal Mail
E61	General	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	The CNMI has been and will continue to provide support for all military initiatives as the Nation and Department of Defense pivot toward the Pacific. The islands of Saipan and Tinian played major roles during World War II and Tinian in specific had the world's busiest airport during the war. The CNMI is extremely supportive of the military and openly endorses a robust military presence throughout the Commonwealth. Many joint training exercises have been conducted on Tinian and throughout the CNMI over the past 30 years.	Comment noted.	Postal Mail
E62	General	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	Observation/Issue: The DEIS states that there will be no more than 8 weeks of divert exercises per year. The DEIS also states "this <u>adaptive management approach ensures</u> that any changes in quality or quantity of exercises is fully analyzed on a continuing basis." The definition of an adaptive management approach does NOT guarantee that there shall <u>NOT</u> be more than 8 weeks of exercises per year. Comment: Please note in the ROD the following: If the DOD desires to increase divert activities and exercises more than 8 weeks per year, it requires the trigger to start a new	The Draft EIS states that "These military exercises are well within levels of training previously analyzed in MIRC EIS. DOD, local stakeholders, and Federal regulators collect and review military training data annually to implement required adaptive management techniques and adaptive mitigation techniques if required. In addition to this annual review, military training in the MIRC ROD is also reviewed on a 5-year cycle. This adaptive	Postal Mail

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						NEPA process that includes public involvement/participation.	management approach ensures that any increase or changes in quality or quantity of exercises is fully analyzed on a continuing basis." The USAF and DOD are aware that if training levels and impacts exceed those analyzed within this EIS and the MIRC EIS, additional NEPA analysis could be needed.	
E63	General	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	Observation/Issue: The DEIS does not address what would happen if there is a termination of the divert activities and exercises mission from the CNMI. There needs to be assurance that the DOD shall properly clean-up the land and facilities to greenfield standards. Comment: Please address in the FEIS how the DOD would clean-up the Divert facilities and land if the mission is terminated. CNMI respectfully requests that the FEIS recommend that the ROD states that the DOD shall properly clean-up the land and facilities to greenfield standards.	Should the DOD terminate Divert Activities and Exercises, the termination action would occur in compliance with federal and local environmental laws and regulations.	Postal Mail
E64	Geological Resources and Soils	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	Observation/Issue: The evaluation of proposed alternatives does not consider proper mitigation of farmland. The evaluation does not consider the value of prime farmland in the CNMI region as it affects the overall economy and quality of life. Comment: Address and consider the value and mitigation required for farmland impacts for each alternative in the FEIS.	The EIS discusses prime farmland protected under the Farmland Protection Policy Act in Section 3.4.1 and 3.4.2. On Saipan and Tinian, there are no prime and unique farmland soils in the areas proposed for development. However, it is recognized that potential grazing lands may be affected on Tinian. The impact on potential grazing lands is provided in Section 4.14.	Postal Mail
E66	Geological Resources and Soils	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	4-51	39-45	N/A	Observation/Issue: The development proposed is located in Seismic Zone 3, which would require structures to be designed and built in conformance with Uniform Building Code for this area. The action states that this "should occur" and does not express a clear commitment to building safety. Comment: The FEIS shall state that the DoD shall build all divert facilities in accordance with Seismic Zone 3 Uniform Building Code.	The EIS was revised to state that "all facilities would meet the engineering requirements in the 2012 International Building Code." This is the most current criteria and AFCEC requires that all facilities meet these code requirements.	Postal Mail
E67	Geological Resources and Soils	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	4-52	21-23	N/A	Observation/Issue: The divert activities will have an increased impact to the Philippine Sea and other nearby water bodies. This is of great concern to CNMI. Comment: Address in the FEIS this issue and level of impacts to the Philippine Sea and other nearby water bodies.	The Proposed Action would have no impacts on the Philippine Sea or other bodies of water. This analysis is provided in the EIS in Section 4.5. Runoff would be controlled through the use of BMPs that will be implemented in coordination with local and federal agency requirements	Postal Mail

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							during and after construction as needed, and will be outlined in an Erosion and Sediment Control Plan (ESCP) and a Stormwater and Pollution Prevention Plan (SWPPP).	
E68	Geological Resources and Soils	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	4-52, 4-53	N/A	N/A	<p>Observation/Issue: The EIS states that the potential impacts of Alternative 2 (Tinian) are anticipated to be similar to, but greater than, those described for alternative 1 (Saipan) as a result of the introduction of a greater level of impervious surface. Mitigation measures for the use of alternative materials should be considered to reduce impacts from impervious surface resulting from both alternatives should be considered.</p> <p>Comment: Address and consider in the FEIS the level of technology and best practices that would the impacts associated with impervious surface issues.</p>	BMPs to reduce impacts associated with impervious surface will be implemented during and after construction as needed and will be outlined in an ESCP and an SWPPP. Examples of BMPs to be implemented are provided in Section 4.5 and Section 4.16.	Postal Mail
E69	Natural Resources	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	<p>Observation/Issue: The nightingale reed warbler is listed as a T&amp;E species. This species is typically found in Tangantangan forest on Saipan.</p> <p>Comment: Address the removal of Tangantangan forest is identified as insignificant and does not consider its overall effect on species that depend on it for habitat in the FEIS.</p>	The discussion of impacts on Saipan in Section 4.6 has been expanded to describe the results of surveys for nightingale reed warblers adjacent to the Saipan airport and to clarify the potential impacts on that species, such as the loss of tangantangan forest. The USAF consulted formally with the USFWS under Section 7 of the Endangered Species Act to determine the effect on the species and the mitigation required. All materials supporting the Section 7 consultation, to include the Biological Opinion, are included in Appendix B of the EIS.	Postal Mail
E70	Natural Resources	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	<p>Observation/Issue: Migratory bird populations and threatened and endangered species are identified as being significantly impacts for Alternative 1 on Saipan. Potential major adverse impact on vegetation (nightingale Reed Warbler) surrounding Saipan airport are present and could result in reduction and destruction of habitat.</p> <p>Comment: The value placed on these species is not consistent with federal protection and value. Address the level of analysis and concern for T&amp;E species such as the nightingale reed warbler in detail and per the federal protection and value and consider their importance and history associated with its habitat on CNMI, particularly</p>	<p>The analysis in Section 4.6 for Saipan does not identify impacts on migratory birds on Saipan as significant.</p> <p>The analysis in Section 4.6 has been expanded to describe recently conducted surveys for nightingale reed warblers at the Saipan airport and to clarify potential impacts on that species better. The USAF formally consulted with the U.S. Fish and Wildlife Service as required by the Endangered Species Act and will implement actions to mitigate impacts on</p>	Postal Mail

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						Saipan.	that species. The USAF has considered the potential effects of their Proposed Action on threatened or endangered species in selecting a preferred alternative. All materials supporting the Section 7 consultation, to include the Biological Opinion, are included in Appendix B of the EIS.	
E71	Natural Resources	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	<p>Observation/Issue: On Tinian, there are no endangered species within the proposed divert base footprint that would require mitigation, whereas divert activities in Saipan proposed divert base footprint would likely necessitate a minimum of \$600K in the mitigation bank.</p> <p>Comment: Address this issue in more detail with the FEIS and take this issue into more consideration when determining the Final Preferred Alternative.</p>	<p>NEPA analysis on resource areas is based on potential impacts on that resource area and not based on cost. Cost is not to be considered a factor when evaluating impacts on the resource area, although the decisionmaker may take cost into account separately as a factor when choosing an alternative in the ROD. Potential mitigation needed to lessen these impacts is included in the EIS; however the ultimate decision is left to the decisionmaker and noted in the ROD.</p> <p>Additionally, the USAF has revised the proposal so that impacts to tangantangan and the nightingale reed warbler would be reduced. This analysis is provided in Section 4.6.</p>	Postal Mail
E72	Natural Resources	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	<p>Observation/Issue: Tangantangan forest was intentionally aerially seed by the US Navy after World War II and has served as a critical habitat for the Nightingale reed warbler on Saipan.</p> <p>Comment: Consider and address in the FEIS the effects of eliminating portion of this species' habitat and address their natural resource and cultural resource affects as part of the cumulative impacts analysis.</p>	<p>Tangantangan was not intentionally seeded by the U.S. government including U.S. Navy post-World War II. Investigations have determined that no intentional seeding of this invasive plant occurred by the U.S. government. Rather, tangantangan is a non-native weedy plant and took advantage of the displaced native forests that were impacted by battles and replaced less aggressive native plants. Impacts on the nightingale reed warbler are addressed in Section 4.6.. The analysis in Section 4.6 has been expanded to describe recently conducted surveys for nightingale reed warblers at the Saipan airport and to clarify potential impacts on that species better. The USAF has formally consulted with the U.S. Fish and Wildlife Service as required</p>	Postal Mail

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							by the Endangered Species Act and will implement actions to mitigate impacts on that species. The USAF has considered the potential effects of their Proposed Action on threatened or endangered species in selecting a preferred alternative. All documentation supporting Section 7 consultation with USFWS, to include the Biological Opinion, is contained in Appendix B.	
E73	Noise Environmental Justice	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	<p>Observation/Issue: Per the DEIS, an estimate of 11,052 people live within the 65 dBA DNL or larger footprint within the Preferred Alternative 1 (Saipan). This is approximately 25% of the Island of Saipan's population and equates to approximately 2,768 low income housing units that are located within this area and are highly impacted by noise from the divert activities. It is critical that this issue be well mitigated if the Saipan Alternative is selected as the location for the divert activities.</p> <p>Comment: If the Preferred Alternative 1 (Saipan) is selected, highly recommend that the ROD include language that states that the DoD shall pay for sound attenuation for housing units and schools within the impacted area and/or coordinate and advocate with the FAA to fund an FAA Sound Attenuation Grant that will sound attenuate the low income housing units within the noise footprint. Recommend that this within the first year that the divert activities are bedded down.</p> <p>Recommend that DOD assist CNMI in coordinating and preparing the FAA Sound Attenuation Grant.</p> <p>If the above language is not part of the ROD, please explain in detail how the DoD plans on mitigating this issue.</p>	The noise analysis was revised based on input from the public, Headquarters Air Force, AFCEC, and FAA. A more thorough land use compatibility assessment was completed based on these revisions to the noise analysis in Sections 4.1 and 4.10. Additionally, the USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	Postal Mail
E74	Noise Socioeconomic	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	<p>Observation/Issue: The DEIS does not adequately address and is very vague regarding the number of tourist that will be impacted by noise, the loss of revenue associated with tourism within this area and how this impact would be mitigated for Alternative 1 (Saipan). The following tourism areas that are highly impacted by noise for this alternative include the Pacific Island Club (PIC) Resort, Coral Ocean Point Resort, Lao Lao Bay Golf and Resort, Ladder Beach and Obyan Beach.</p> <p>Comment: Explain in detail the total impact on tourism from noise impacts and how the DoD will mitigate the loss</p>	The USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public. Impacts on tourism are discussed in Section 4.14. Impacts on recreation are discussed in	Postal Mail

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						of revenue associated with this impact.	Section 4.9.	
E75	Recreation	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	<p>Observation/Issue: The proposed parking aprons along the north side of GSN runways and the proposed BEAR-kit site at the existing soccer field between Flame Tree and Airport Roads.</p> <p>Comment: The proposed parking aprons along the north side of GSN runways and the proposed BEAR-kit site at the existing soccer field between Flame Tree and Airport Roads. The soccer field is often used by numerous high schools and recreational league sports teams. Please indicate how the scheduled training exercises will be coordinated and communicated to the community to avoid scheduling conflicts.</p>	The USAF will coordinate with the Government of CNMI to schedule divert activities and exercises. This information is presented in Section 4.16 in the EIS.	Postal Mail
E76	Recreation	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	<p>Observation/Issue: The noise impacts will have a significant effect on the following sites, Lao Lao Bay Golf Course, Coral Ocean Point Golf Course, Obyan Beach, Ladder Beach, Forbidden Island, and the Pacific Islands Club Resort and Waterpark.</p> <p>Comment: Please address in the FEIS: In addition to the residents affects, the number of tourist affected by noise who will be using these recreational facilities should be taken into account.</p>	The USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public. Impacts on tourism are discussed in Section 4.14. Impacts on recreation are discussed in Section 4.9.	Postal Mail
E77	Socioeconomics	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	<p>Observation/Issue: Loss of revenue from commercial airline operations due to a closure of the airport associated with a DOD event is not addressed in the DEIS. Mitigation measures need to be identified to address this loss of revenue during the times the airport is closed due to DOD activities.</p> <p>Comment: Please address the issue of loss of revenue from commercial airline operations due to a closure of the airport associated with a DOD event is not addressed in the FEIS. Also, address and identify mitigation measures needed to address this loss of revenue from commercial operations during times the airport is closed due to DOD activities.</p>	Planned exercises would not shut down the airport as a result of DOD activities. The No Action alternative, which includes existing emergency divers, could result in temporary disruption of air service. Use of the airport for humanitarian assistance and disaster relief or contingency operations could potentially have minor temporary effects on air service but it is not anticipated that the airport would need to be shut down. It is not anticipated that there would be any loss of revenue from commercial operations during divert activities.	Postal Mail
E78	Tinian v. Saipan: Covenant	Political Stakeholder Government of CNMI (Submitted by	N/A	N/A	N/A	<p>Observation/Issue: Reconsider acquiring an additional 40+ acres associated with Alternative 1 (Saipan) vs. the use of the extensive amount of land already under lease by the DOD on Tinian. This issue needs special consideration. The Covenant DoD leased lands on Tinian are adjacent to</p>	The EIS has been revised in Sections 1 and 2 to include a discussion of The Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America	Postal Mail

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						the Tinian International Airport and are currently designated for DoD operations. Comment: Please explain the rationale for why DoD is asking for an additional 40+ acres of land on Saipan for Alternative 1	(Covenant) contained at 48 U.S.C. 1801 et seq. which recognizes the significance and scarcity of land. The EIS has also been revised to consider the Covenant lands on Tinian for the Proposed Action. However, as further explained in the EIS, the Covenant lands are dismissed as alternatives because they do not meet the selection standards or the purpose of and need for the Proposed Action.	
E79	Tinian v. Saipan: Covenant	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	Observation/Issue: Approximately 17,799 acres of land on Tinian and 177 acres of land on Saipan are part of the Covenant. The Covenant, an agreement between the US and CNMI was codified at 48 U.S.C. § 1801, Section 803. Use of the leased lands on Tinian would provide a beneficial impact to the DoD operation and its commitment to Tinian. Comment: Please include in the DEIS an overall assessment of land use per the letter and spirit of Section 803 of the Covenant that established the Commonwealth of the Northern Mariana Islands.	The EIS has been revised in Sections 1 and 2 to include a discussion of The Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America (Covenant) contained at 48 U.S.C. 1801 et seq. which recognizes the significance and scarcity of land. Land use analysis is provided in Section 4.10.	Postal Mail
E80	Tinian v. Saipan: Environmental Justice	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	Observation/Issue: Alternative 1 (Saipan) has the greatest negative impact (noise) on the lowest economic group of citizens in comparison to the positive effect on the community and citizens on Tinian. According to Alternative 2 (Tinian), Alternative 2 (Tinian) would eliminate the potential for any environmental justice concerns, by reducing or eliminating the noise and associated impacts on the population in the villages of Koblerville, Dan Dan, and San Antonio. Comment: We strongly recommend that the DoD select Alternative 2 (Tinian) as the Final Preferred Alternative since it eliminates any potential socioeconomic and environmental justice impacts.	The USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available to the public.	Postal Mail
E81	Tinian v. Saipan: Joint Use	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	Observation/Issue: Cumulative Impacts. It is important that the DEIS consider and address at an overall planning level the integrated use of lands within CNMI, especially Saipan and Tinian related to the Record of Decision for the Military Buildup for the US Marines and the use of Tinian, use of Tinian as part of the MERC and the proposed Divert Activities. Comment: Please address in the FEIS the positive benefits	Section 5 of the EIS addresses cumulative impacts of all past, present, and reasonably foreseeable actions on Saipan and Tinian with the Divert Proposed Action.	Postal Mail

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						associated with collocating DoD joint operations on Tinian.		
E81	Tinian v. Saipan: Joint Use	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	Observation/Issue: Impacts: It is important that the EIS consider and address, at an overall planning level, the integrated use of lands within CNMI, especially Saipan and Tinian related to the Record of Decision for the Military Buildup for the US Marines and the use of Tinian, use of Tinian as part of the MIRC and the proposed Divert Activities.	Section 5 of the EIS addresses cumulative impacts of all past, present, and reasonably foreseeable actions on Saipan and Tinian with the Divert Proposed Action.	Postal Mail
E82	Tinian v. Saipan: Land Use	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	Observation/Issue: The use of land on island communities has significant impact on the local people and their culture due to the limited and scarcity of land for competing uses and needs. Comment: The value of scarcity of island land is not addressed in the FEIS. Please assess this issue in the FEIS and consider it in determining the Final Preferred Alternative.	The EIS has been revised in Sections 1 and 2 to include a discussion of The Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America (Covenant) contained at 48 U.S.C. 1801 et seq. which recognizes the significance and scarcity of land. However, the USAF is not proposing a permanent beddown.	Postal Mail
E83	Tinian v. Saipan: Socioeconomics	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	Observation/Issue: The initial Tinian investment would be slightly higher if viewed as a standalone action. However, as an initial component to a long term strategic initiative, this delta in costs are insignificant and are easily off-set by long term return on investment for CNMI. Investing in the Tinian alternative is in concert with and reinforces DOD's needs in the Pacific Region. The DEIS lacks in defining and quantifying the economic benefit and is too vague to determine a valid assessment between the alternatives. Comment: The value of the potential economic benefits be clearly defined and quantified in the Final EIS to communicate the economic value of the one-time capital investment (construction) as well as the potential annual revenue (generated from the divert activities usage).	NEPA analysis on resource areas is based on perceived impacts on that resource area and not based on cost. Cost is not to be considered a factor when evaluating impacts on the resource area although the decisionmaker may take cost factors into account when making decisions about the Proposed Action and alternatives. The ultimate decision is left to the decisionmaker and will be discussed in the ROD. The decisionmaker could take cost factors into consideration in addition to the analysis of environmental impacts presented in the EIS as weighed against the Purpose and Need and mission requirements.	Postal Mail
E84	Water Resources	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	4.5.1 and 4.5.2	Observation/Issue: The overall impacts for both alternatives do not take into consideration the use of improved materials and technologies that would allow for reduced impacts (runoff and sedimentation) to water bodies.	BMPs would be implemented during and after construction as needed and would be outlined in an ESCP and an SWPPP. BMPs are included in Section 4.16 in the EIS.	Postal Mail
E85	Water Resources	Political Stakeholder	4-55	20-21	N/A	Observation/Issue: The proposed actions do not consider the alteration of flood zones as a result of regarding and	Because there are no flood zones within the Project Area, no impacts on flood zones are	Postal Mail

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		Government of CNMI (Submitted by Lt. Gov. Inos)				changes to ground levels.	expected.	
E86	Water Resources	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	4-54, 4-55	N/A	N/A	Observation/Issue: Impacts resulting from Alternative 1 are identified as degradation with a broad range of pollutants affecting highly permeable surfaces that could be high susceptible to contamination. The commitment to reducing potential impacts hinges on that the infiltration features "should not" be located in close proximity to wellhead protection areas of GSN (Isley Field) in order to ensure protection of a safe drinking water supply. The exact distance that would be considered safe and the commitment to apply mitigation measures is not explicit in the evaluation. This needs to be developed.	BMPs would be implemented during and after construction as needed and would be outlined in an ESCP and an SWPPP. BMPs are included in Section 4.16 in the EIS.	Postal Mail
E87	Water Resources	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	Observation/Issue: The impacts resulting from Alternative 2 are identified as long term whereas the impacts resulting from Alternative 1 are identified as short term. The rationale behind the duration of impacts is not clear and requires further evaluation and clarification.	Text in Section 4.5 of the EIS was revised to indicate potential long-term impacts for alternatives on Saipan and Tinian.	Postal Mail
E88	Water Resources	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	4.5.1 and 4.5.2	Observation/Issue: The assessment of Alternative 2 is based upon the extent of impervious surface introduced and does not consider alternative methodologies to reduce these surfaces or the imperviousness of these surfaces.	BMPs would be implemented during and after construction as needed and would be outlined in an ESCP and an SWPPP. BMPs are included in Section 4.16 in the EIS. Additionally, the USAF has revised its proposal based on agency and public comments on the Draft EIS. Due to the reduced scope of the revised proposal, the USAF is providing an additional opportunity to comment on the proposed action and alternatives by making a Revised Draft EIS available to agencies and the public.	Postal Mail
E89	Water Resources	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	Observation/Issue: The analysis states "without proper site design, the implementation of Alternative 1 could lead to a depletion of groundwater resources and increased salt water intrusion to drinking water wells." Comment: Will there be an opportunity to comment on and review the final site design when a final determination of impacts are evaluated and assessed?	BMPs would be implemented during and after construction as needed and would be outlined in an ESCP and an SWPPP. BMPs are included in Section 4.16 in the EIS. The USAF has revised its proposal based on agency and public comments on the Draft EIS. Due to the reduced scope of the	Postal Mail

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							revised proposal, the USAF is providing an additional opportunity to comment on the proposed action and alternatives by making a Revised Draft EIS available to agencies and the public.	
E90	Water Resources	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	4-54	N/A	N/A	Observation/Issue: The EIS states that "designs could incorporate structural storm water management methods such as storm water retention ponds, shallow infiltration basins, and infiltration trenches, to collect storm water from the new impervious surfaces and allow water to infiltrate the ground to help restore or enhance...recharge rates" Comment: This statement does not commit to mitigation measures or consider proper BMPs such as permeable surfaces where practicable. This needs to be developed in the FEIS.	BMPs would be implemented during and after construction as needed and would be outlined in an ESCP and an SWPPP. BMPs are included in Section 4.16 in the EIS.	Postal Mail
E91	Water Resources	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	Observation/Issue: Potential major adverse impact as a result of storm water sheet runoff or especially accidental petroleum spills. Comment: An enhance SPCC program and controls need to be assessed in both alternatives.	BMPs would be implemented prior to and after construction and would be outlined in an SPCC Plan. BMPs are included in Section 4.16 in the EIS.	Postal Mail
E92	Water Resources	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	Observation/Issue: The increase in impervious surfaces has a greater effect on Saipan due to the recharge of the water aquifer and impact to the Waste Water Treatment Demands Alternative 1: total increase in impervious surface area of 2,392,200 sf Alternative 2: total increase in impervious surface area of 4,090,800 sf Comment: The impact of the increased WTF demands needs to be determined.	The increase of impervious surface areas is addressed in the EIS and would be fully permitted under SWPPP approved by CNMI. It is not anticipated that increased demand would be placed upon the WWTF as personnel would be housed in existing commercial hotels with existing WWTF hook-ups capable of handling the flow.	Postal Mail
E93	Water Resources	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	Observation/Issue: There is a need for consideration of alternative materials such as permeable surfaces that would reduce runoff and infiltration rates that would affect water resources, where practicable. The evaluation and assessment of Alternative 2 identifies potential impacts as being slightly greater than alternative 1. Comment: The use of improved technologies and surface materials should be considered to mitigate impacts that	BMPs would be implemented during and after construction as needed and would be outlined in an ESCP and an SWPPP. BMPs are included in Section 4.16 in the EIS.	Postal Mail

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						could have the potential to result in insignificant impacts.		
E94	Noise	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	<p>Observation/Issue: The off-airport area of land that is subject to increased noise levels for Alternative 1 (Saipan) is three times greater than that of Alternative 2 (Tinian); however, the overall impacts are identified as being equivalent for both alternatives. Area of Noise Impact statistic comparison includes: Alternative 1 (Saipan) - 11,052 people and 4 schools are impacted by noise Alternative 2 (Tinian) - 523 people and no schools are impacted by noise</p> <p>This analysis is not accurate given the disproportionate area of land and people subject to increased noise levels for Alternative 1 (Saipan).</p> <p>Comment: We strongly recommend that the DoD select Alternative 2 (Tinian) as the Final Preferred Alternative since there are minimal noise impacts associated with this alternative. If the DoD does not select Alternative 2 (Tinian) as the Final Preferred Alternative, please explain the DoD's justification on why they would select Alternative 1 (Saipan) that has a HIGH Noise Impact on the community over an alternative that has Minimal to No Noise Impact. In addition, please explain in detail what other regulatory and non-regulatory decision making items went into the decision to select Alternative 1 (Saipan).</p>	Based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives. The USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available to the public.	Postal Mail
E95	Noise	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	<p>Observation/Issue: Noise sensitive land uses (Koblerville Elementary School, San Antonio Elementary School, Vincente Elementary School and Southern High School) currently exist with the 65dB DNL or larger footprints in the Preferred Alternative 1 (Saipan). Schools, that are currently located within the 65 dBA DNL noise levels and higher, are limited to using their air conditioning to a few hours a day and thus it is necessary to conduct classroom activities with the windows open. Classroom activities are highly impacted by the noise generated by divert activities during the time that the windows are open. Mitigation measures to reduce noise impacts are NOT adequately addressed in the DEIS. Detailed mitigation measure should be included in the document.</p> <p>Comment: Please confirm that the Record of Decision (ROD) will include language stating that the <u>DOD shall</u> coordinate the schedule of all Divert Activities and</p>	The USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available to the public. Mitigation measures and BMPs are provided in Section 4.16.	Postal Mail

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						Exercises with Government of CNMI and CNMI's Public School System in order to de-conflict any potential compatibility issues associated with noise generated by the divert activities. If the ROD will not include language to this affect is not in the ROD please explain how the DoD will guarantee that coordination for scheduling divert activities will occur with these agencies. Recommend that the DoD sound attenuate the schools if de-confliction of noise impacts are not guaranteed through scheduling.		
E96	Noise	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	4-6	6-7	N/A	Observation/Issue: The analysis of the High Scenario of Alternative 1 states "Under the Medium Scenario, approximately 37,115 acres consists of non-airport property." Comment: This should be corrected to " <i>under the High Scenario ...</i> "	The USAF has revised the noise analysis in Section 4.1. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	Postal Mail
E97	Tinian v. Saipan: Socioeconomics	Political Stakeholder Government of CNMI (Submitted by Lt. Gov. Inos)	N/A	N/A	N/A	Observation/Issue: The development of the part in Tinian can underpin the potential economic development for the economy of Tinian. Although the value of the investment will benefit CNMI with either alternative, the greatest long term economic impact will be realized with alternative 2 (Tinian) being the divert installation. Comment: The EIS needs to take this issue into consideration when developing the FEIS.	Socioeconomic impacts are discussed in Section 4.14 of the EIS.	Postal Mail
F98	Tinian v. Saipan	Political Stakeholder Tinian Mayor Ramon Dela Cruz	N/A	N/A	N/A	As the mayor of the Municipality of Tinian and Aguiguan, I am submitting the attached three documents for your review. They include comments from Governor of the CNMI Benigno Fitial and his White Paper defining the Military Integrated Management Committee's stance on the Draft Environmental Impact Statement for Divert Activities and Exercises, Guam and Commonwealth of the Northern Mariana Islands ~ a resolution from the CNMI Senate; and our comments on the draft EIS from the Tinian Joint Leadership. All three share two common perspectives. First, they all support the construction of an Air Force Divert Base on either Tinian or Saipan. And, second, they all agree that Tinian is the best location for the Divert Base.	Submittal of the documents has been noted.	Postal Mail
F99	Tinian v. Saipan: Joint Use	Political Stakeholder Tinian Mayor	N/A	N/A	N/A	The people of Tinian have strong feelings about the Divert Base being constructed on Tinian, for several good reasons. Tinian was the world's busiest airport during World War II.	The EIS has been revised in Sections 1 and 2 to include a discussion of The Covenant to Establish a Commonwealth of the	Postal Mail

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		Ramon Dela Cruz				Many joint training exercises have been successfully conducted on Tinian over the past 30 years, with the recent Marine Air Group 12 operations on both West Field and North Field being the best example of potential air operations on Tinian. Additional land would not need to be acquired if the base to be built on Tinian. Finally, and perhaps most important, the people of Tinian have been waiting patiently for the promised military development of their island since they agreed to lease two-thirds of their island to the United States Department of Defense in 1975.	Northern Mariana Islands in Political Union with the United States of America (Covenant) contained at 48 U.S.C. 1801 et seq. which recognizes the significance and scarcity of land. The EIS has also been revised to consider the Covenant lands on Tinian for the Proposed Action. However, as further explained in the EIS, the Covenant lands are dismissed as alternatives because they do not meet the selection standards or the purpose of and need for the Proposed Action.	
F100	Tinian v. Saipan: Covenant	Political Stakeholder Tinian Mayor Ramon Dela Cruz	N/A	N/A	N/A	Although it might be true that it would be easier to establish the Divert Base on Saipan at this time, it would be in the best long-term interest of both the United States and the Commonwealth of the Northern Mariana Islands to have the base built on Tinian. If built on Tinian, the Air Force could obtain 100 % operational resiliency. If a true national emergency were to arise, the Divert Base on Tinian could be expanded onto adjacent lands already leased by the Department of Defense.	The EIS has also been revised to consider the Covenant lands on Tinian for the Proposed Action. However, as further explained in the EIS, the Covenant lands are dismissed as alternatives because they do not meet the selection standards or the purpose of and need for the Proposed Action. Additionally, based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	Postal Mail
F101	Tinian v. Saipan: Socioeconomics	Political Stakeholder Tinian Mayor Ramon Dela Cruz	N/A	N/A	N/A	Construction of the Divert Base on Tinian would spark the economic development of this island and facilitate the development of other military activities on Tinian's military leased lands.	Comment noted.	Postal Mail
G102	General	Political Stakeholder Chief of Staff to Tinian Mayor Don Farrell	N/A	N/A	N/A	First and foremost, the establishment of an Air Force Divert Base in the CNMI is a welcome addition to the economy of the islands, whether it is constructed on Saipan where better housing and recreational opportunities are currently available for Air Force personnel, or on Tinian where the United States Air Force can obtain 100% of its operational resiliency in case of need, albeit with a lesser number of	Sections 1 and 2 of the EIS have been edited to reflect a discussion of recently proposed but not completed infrastructure projects. Additionally, based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified	Postal Mail

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						<p>high end hotels, restaurants and golf courses.</p> <p>However, higher echelon Air Force decision makers should be aware that the draft EIS for a Divert Base in the Northern Mariana Islands is flawed both fundamentally and technically with regard to the Tinian option. There are significant costs that have not been clearly identified in either the EIS or the Executive Summary and there are significant recent developments on Tinian that have not been identified</p>	<p>alternatives. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.</p>	
G103	Tinian v. Saipan: Covenant	Political Stakeholder Chief of Staff to Tinian Mayor Don Farrell	N/A	N/A	N/A	<p>Fundamentally, the EIS fails to recognize either the letter or the spirit of the Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America, codified at 48 U.S.C. § 1801. Section 803 of the Covenant provides for the joint use of Tinian Harbor and Tinian West Field International Airport. When developed in the early 1970s it provided sufficient land for ground, sea and air training exercises to support air training and maneuvers, and an ammunition storage area. To this date, these lands have not been utilized and remain available to the Department of Defense. Operations on Tinian, therefore, are free to the military services, whereas they will have to pay to land aircraft at Saipan.</p> <p>Most important, Section 806 (a) of the Covenant provides that the United States will continue to recognize and respect the scarcity and special importance of land in the Northern Marianas. If the United States must acquire any interest in real property which it does not obtain under the Covenant, the United States will only seek to acquire such land if the public enterprise cannot be accomplished with a lesser interest. The lesser interest, in this case, would be taking advantage of the lands already under lease on Tinian. Essentially, this precludes the lease of additional lands on Saipan for a purpose that can be fulfilled on Tinian leased lands.</p> <p>The Covenant is also said to be the general United States policy with respect to land acquisition in the Northern Mariana Islands. It provides significant protections against the arbitrary or improper use of the authority of the United States to acquire property in the Commonwealth. This is especially so in view of the fact that Subsection (b) provides that no interest in real property will be acquired by the United States unless the acquisition has been duly authorized by the Congress and appropriations are available to pay the landowner just compensation. It is difficult to</p>	<p>The EIS has been revised in Sections 1 and 2 to include a discussion of The Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America (Covenant) contained at 48 U.S.C. 1801 et seq. which recognizes the significance and scarcity of land. The EIS has also been revised to consider the Covenant lands on Tinian for the Proposed Action. However, as further explained in the EIS, the Covenant lands are dismissed as alternatives because they do not meet the selection standards or the purpose of and need for the Proposed Action. Additionally, based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.</p>	Postal Mail

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						speculate on the cost of a long-term lease on 40 acres of prime land at Saipan International Airport, however, it would certainly be in the millions of dollars - far more than the cost of repairs to the breakwater at Tinian Harbor, for instance		
G104	Tinian v. Saipan: Covenant	Political Stakeholder Chief of Staff to Tinian Mayor Don Farrell	N/A	N/A	N/A	Finally, and most important to the people of Tinian, building the Divert Base on Tinian will begin to fulfill a 40-year-old pledge to the people of Tinian. Before the 1975 plebiscite to ratify the Covenant, representatives of the United States of America., both military and civilian, led the people of Tinian to believe that if they voted in favor of the Covenant - including the technical agreement to lease two-thirds of their island for a hundred years - the United States would build a large multi-service training base on Tinian and the people of Tinian would benefit from the economic development. Other than few a few scattered training exercises, no significant military development has occurred on Tinian. The port of Tinian, built by Navy Seabees during World War II has been neglected, as have the access roads on the military leased lands. Building the Divert Base on Tinian will begin to allay the concerns of some Tinian residents who are now questioning the wisdom of their 1975 decision	The EIS has been revised in Sections 1 and 2 to include a discussion of The Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America (Covenant) contained at 48 U.S.C. 1801 et seq. which recognizes the significance and scarcity of land. The EIS has also been revised to consider the Covenant lands on Tinian for the Proposed Action. However, as further explained in the EIS, the Covenant lands are dismissed as alternatives because they do not meet the selection standards or the purpose of and need for the Proposed Action. Additionally, based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	Postal Mail
G105	Tinian v. Saipan: Covenant	Political Stakeholder Chief of Staff to Tinian Mayor Don Farrell	N/A	N/A	N/A	I find it very disappointing that the EIS has identified Saipan as the number one preference over the island of Tinian. For several reasons. The primary reason of course is that the covenant which established the Commonwealth of the Northern Mariana Islands including the technical agreement in Section 3 -- 803 of that Agreement, identified 2/3 of the Island of Tinian for military purposes and concluded that a -- not only have been identified for all future military uses, this included of course Farallon de Medinilla and certainly on Saipan, and 2/3 of the island of Tinian. It also stated that should the United States ever need additional land, they would have to lease or purchase those lands from the CNMI; and that cost would be far greater than any cost that would be incurred by establishing the base here on Tinian.	The EIS has been revised in Sections 1 and 2 to include a discussion of The Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America (Covenant) contained at 48 U.S.C. 1801 et seq. which recognizes the significance and scarcity of land. The EIS has also been revised to consider the Covenant lands on Tinian for the Proposed Action. However, as further explained in the EIS, the Covenant lands are dismissed as alternatives because they do not meet the selection standards or the purpose of and need for the Proposed Action. Additionally, based on comments received on the DEIS	Tinian Public Hearing Verbal Comment

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							and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	
G106	Tinian v. Saipan: Infrastructure	Political Stakeholder Chief of Staff to Tinian Mayor Don Farrell	N/A	N/A	N/A	Although it is true that Saipan has more high end hotels than Tinian, the Tinian Dynasty Hotel and Casino has 412 rooms with a total capacity of well over 700, more than enough to support the personnel recommended in the EIS. Furthermore, if the Divert Base is constructed on Tinian, the refueling system would make the airport fully capable of receiving foreign jet aircraft. This would undoubtedly stimulate investors who have already purchased casino licenses to begin construction on their hotel complex. Just this month, Matua Bay resort broke ground on a new golf course to be located along beautiful Nassarino Beach on Southwestern coast of Tinian.	Comment noted. Sections 1 and 2 of the EIS have been edited to reflect a discussion of the hotel capacity of Tinian. Development of the fueling system and other improvements at Tinian airport would enhance the Tinian airport's capabilities. However, before increased traffic would be permitted, FAA would require additional airport certifications be completed.	Postal Mail
G107	Tinian v. Saipan: Infrastructure	Political Stakeholder Chief of Staff to Tinian Mayor Don Farrell	N/A	N/A	N/A	The draft EIS goes to lengths to discuss the "dilapidated condition of the Tinian Harbor and the Tinian Dump. Currently, the fuel dock at Tinian Harbor is receiving extensive repairs, including a new sea wall, bollards and fenders. Recently, the Tinian joint leadership has concluded negotiations with the CPA and OIA to repair the two finger piers at the dock. This expenditure of CNMI CIP funds will undoubtedly lead to funding to repair the Breakwater. New equipment is being purchased to maintain the existing Tinian Dump, and design work is already at 30% completion for a new solid waste transfer station and a new landfill. Together, they will be more than adequate to handle all solid and liquid wastes produced by the Divert Base.	Comment noted. Sections 1 and 2 of the EIS were revised to include this recent information.	Postal Mail
G108	Tinian v. Saipan: Infrastructure	Political Stakeholder Chief of Staff to Tinian Mayor Don Farrell	N/A	N/A	N/A	The stated primary justification for building the Divert Base is to give resiliency to the Air Force's primary mission in the Pacific by assuring a fall back base in case Andersen Air Force Base is compromised or if a natural or man-made disaster elsewhere mandates humanitarian relief. By utilizing Tinian, the United States Air Force could accomplish its mission 100%, whereas if the facility is established on Saipan they would lose 17% operational opportunity. The runway at Tinian's West Field	Comment noted. Based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	Postal Mail

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						International Airport could easily be extended to provide the runway necessary for the largest cargo and aerial refueling aircraft in the Air Force inventory.		
G109	Tinian v. Saipan: Infrastructure  Tinian v. Saipan: Cumulative Impacts	Political Stakeholder Chief of Staff to Tinian Mayor Don Farrell	N/A	N/A	N/A	The second reason is, I believe that the AI's document is outdated. There are several economic development projects that are going on right now including creation of landfills, solid waste transfer station, and significant improvements to the harbor that are not listed in the EIS. I would like to suggest that the EIS meet technical work before it's submitted to the Secretary of the Air Force for consideration.	Comment noted. Sections 1 and 2 of the EIS have been edited to reflect a discussion of recently proposed but not completed infrastructure projects.	Tinian Public Hearing Verbal Comment
G110	Tinian v. Saipan: Joint Use	Political Stakeholder Chief of Staff to Tinian Mayor Don Farrell	N/A	N/A	N/A	The draft Air Force EIS also flies in the face of the Congressional mandate to streamline the DoD by establishing inter-service operations. This September there will be a joint Army-Navy training operation on North Field. At about the same time the III MEF will conduct a joint Navy-Marine Corps training operation on North Field. Most significantly, the recent Marine Air Group - 12 exercise on both West Field, establishing restraining wires for F-18 hot refueling operations, and on North Field, establishing an expeditionary airfield, demonstrated the island's ability to support major air operations. Despite all this joint inter-service activity on the part of the Army, Navy and Marine Corps, the Air Force-created draft EIS for a Divert Base purports to separate Air Force operations from the other services currently taking advantage of the joint-use opportunities available on existing Tinian leased lands.	Sections 1 and 2 of the EIS have been revised to discuss the Tinian leased lands. However, as further explained in the EIS, the Covenant lands are dismissed as alternatives because they do not meet the selection standards or the purpose of and need for the Proposed Action. Additionally, based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.  Section 5 of the EIS addresses cumulative impacts of all past, present, and reasonably foreseeable actions on Saipan and Tinian with the Divert Proposed Action.	Postal Mail
G111	Tinian v. Saipan: Joint Use  Cumulative Impacts	Political Stakeholder Chief of Staff to Tinian Mayor Don Farrell	N/A	N/A	N/A	Technically, the draft EIS is out of date. It fails to take into account several developments on Tinian in the last 2 years. The Record of Decision issued by the US Marine Corps in September 2010 created live fire rifle ranges on Tinian, primarily for the use of the US Marine Corps, yet available to all other federal agencies with a need to maintain small arms certification. Furthermore, Tinian was visited by high ranking representatives of the Japanese Self-Defense Force (JSDF), which co-funded the recent MAG -12 operations on Tinian. They are now considering joint USMC-JSDF	These proposals are discussed in Section 5, Cumulative Impacts.	Postal Mail

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						training exercises on Tinian. Having a fully operational air base on Tinian with refueling capabilities will support the Marine Corps effort on Tinian as well as joint training operations with other US and JSDF teams.		
G112	Tinian v. Saipan: Natural Resources	Political Stakeholder Chief of Staff to Tinian Mayor Don Farrell	N/A	N/A	N/A	On Tinian, there are no endangered species within the proposed divert base area that would require mitigation, whereas construction in Saipan would likely necessitate a \$600,000 deposit in the mitigation bank.	Comment noted.	Postal Mail
G113	Tinian v. Saipan: Noise Airport Ops	Political Stakeholder Chief of Staff to Tinian Mayor Don Farrell	N/A	N/A	N/A	The population of Tinian is not 5,000 people, as stated in the EIS. It is barely 3,000. Utilizing Tinian for the planned 8 weeks per year for training exercises will interfere less with local air traffic control than on Saipan, cause less effective noise pollution for the local community, and, because of the Covenant, the Air Force will not have to pay landing fees on Tinian. During the recent MAG - 12 operation at West Field International Airport, F-18 Hornets practiced rotating hot-refueling operations throughout the day for a full week with no appreciable distress to the community. Landing KC-135s as well as fighter jets at Saipan International Airport would cause considerable distress to the local population, and particularly to Kobler Elementary School and Southern High School, both of which are in the flight pattern.	Comment noted. The EIS has been revised with the most recent U.S. Census data. The USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available to the public.	Postal Mail
G114	Tinian v. Saipan: Socioeconomics	Political Stakeholder Chief of Staff to Tinian Mayor Don Farrell	N/A	N/A	N/A	Furthermore, as noted in the draft EIS, while the construction of the Divert Base on Saipan will be of relatively minor importance to that economy, utilizing Tinian will provide a significant stimulus to the general economic development of this underdeveloped island, therefore decreasing the need for federal subsidies; building the Divert Base on Tinian will mean the completion of the West Field International Airport and the arrival of international commercial aircraft, allowing not only the importation of tourists, but the export of fresh and frozen produce and meats; completion of the Divert Base will stimulate the Army, Army Reserve, National Guard, Navy, and its Marine Corps, to take better advantage of training opportunities on Tinian.	Comment noted.	Postal Mail
H115	General	Political Stakeholder Guam Senator	N/A	N/A	N/A	I concur with the proposed actions of either Saipan International Airport in Saipan or Tinian International Airport in Tinian. A. B. Won Pat International Airport in	Comment noted.	Postal Mail

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		Judith P. Guthertz				<p>Guam is not considered a feasible alternative location since it is too close to Andersen AFB. If a typhoon impacts on Andersen AFB, it will also impact on the A.B. Won Pat International Airport, only about twelve miles south of Andersen AFB.</p> <p>I support any program by our military to enhance its presence in the Mariana Islands. The people in Guam and the CNMI are very supportive of our military and very patriotic. In addition, any economic investment in the islands is critically needed at this time. The economy of the CNMI is very weak and any boost will be of major positive economic impact for this community of American citizens.</p>		
H116	Tinian v. Saipan Covenant	Political Stakeholder Guam Senator P. Guthertz	N/A	N/A	N/A	<p>The people of the CNMI actually voted in a plebiscite to become American citizens. They had to choose to remain non-American citizens, but they voted on June 17, 1975, (78.8 percent voting "yes") to become Americans. This was the first acquisition of American soil since the 1917 purchase of the Virgin Islands. At that time, the United States Government stated that it intended to invest economically by developing a harbor area in Saipan and an Air Base in Tinian. The United States, in the political agreement, called (The Commonwealth Covenant) leased the northern two-thirds of Tinian for ninety-nine (99) years for about \$21 Million Dollars. This was supposed to be a fall-back for Clark AFB in the Philippines. In 1990, when Mount Pinatubo near Clark AFB blew, the Air Force shut down Clark, but did not move those assets to Tinian, but scattered them around the Western States, Hawaii, and Guam. This was the time when the Soviet Union was collapsing and the end of the Cold War was in sight.</p> <p>Therefore, the anticipated development of an Air Force base in Tinian with its accompanied harbor facility in Saipan never came about. The United States can rightfully be seen as falling short on its commitments made in the run up to the critical plebiscite in 1975. We welcomed the population into our American political family, but have not reciprocated with the economic development envisioned at the time. For these reasons, I cheer the USAF desires to invest in the CNMI. I have been in touch with the CNMI Governor's and Tinian Mayor's staffs on this DEIS and have received word from them that any USAF investment will be</p>	<p>Comment noted. Based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available to the public. Sections 1 and 2 of the EIS have also been revised to discuss the Tinian leased lands. However, as further explained in the EIS, the Covenant lands are dismissed as alternatives because they do not meet the selection standards or the purpose of and need for the Proposed Action.</p>	Postal Mail

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						welcomed, whether it is in Saipan or Tinian. If all of the technical studies indicate that both Saipan and Tinian are feasible locations, I would then choose Tinian. Additional land would not need to be acquired, and the people there have been waiting patiently for the promised military development of their island. I support the CNMI Governor and the Tinian Mayor and I understand that my recommendation above is their position. They welcome any military investment and presence, anywhere in the CNMI, while favoring Tinian if that location is feasible. If it is not feasible, then they would support Saipan as the choice.		
I117	Tinian v. Saipan: Airport Ops	Political Stakeholder Congressman Gregorio Kilili Gregorio Sablan U.S. Congress, CNMI	N/A	N/A	N/A	<p>[Of the two alternative sites, however, Tinian International Airport should be given preference in my view over Saipan International Airport for the following reasons]:</p> <p>The Tinian airport alternative would reduce potential conflicts between commercial and military activities. The Saipan International Airport is the gateway for the tourist economy of the Northern Marianas. There were in 2011 an average of 140 aircraft operations daily at the Saipan airport, including jet, single engine, and turbo prop international and inter-island flights. By contrast, there were 113 aircraft operations daily on average at Tinian airport in 2011, but these all involved small, single-engine aircraft and no international flights. So the Tinian Airport has greater capacity for the proposed increased use by the military.</p> <p>In addition, it has been demonstrated that military use can disrupt the commercial flights at Saipan Airport, which are essential to the overall economy of the islands. On February 21, 2012, an Air Force F-16 Falcon made an emergency landing at Saipan International Airport. This single incident forced the runway to be shut down for 18 hours, causing delays and cancellations of domestic and international flights to the detriment of tourist travel. The Proposed Action estimates eight weeks per year of joint military exercises and divert and humanitarian airlift staging training, so the potential for disruption of commercial activities at the Saipan Airport would be significant. The Tinian alternative would reduce this potential for conflict and avoid detriment to the flight-dependent tourist economy, as well as loss of revenues to the Commonwealth Ports Authority from decreased landing and other fees from</p>	Comment noted. The EIS discusses impacts on flights and tourism in the Airspace and Airfield Operations section (Section 4.3) and the Socioeconomics section (Section 4.14).	Postal Mail

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						an interruption in commercial flights.		
I118	Tinian v. Saipan: Infrastructure	Political Stakeholder Congressman Gregorio Kilili Gregorio Sablan U.S. Congress, CNMI	N/A	N/A	N/A	<p>[Of the two alternative sites, however, Tinian International Airport should be given preference in my view over Saipan International Airport for the following reasons]:</p> <p>Tinian airport's runway could more easily be expanded to the requisite length. The Proposed Action would require that the Saipan airport runway be extended from the current 8,700 feet length to 10,075 feet. This would require that additional land be leased from the government of the Northern Mariana Islands at a cost to the Department of Defense. This Saipan extension would also require prior approval by the Federal Aviation Administration for a non-standard runway.</p> <p>By contrast, expansion of Tinian's airport runway from its current 8,600 feet to a requisite 10,000 feet would not require that additional land be leased from the local government. Rather the additional land needed for the runway extension is in the area already leased and paid for by the U.S</p>	Based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	Postal Mail
I119	Tinian v. Saipan: Infrastructure	Political Stakeholder Congressman Gregorio Kilili Gregorio Sablan U.S. Congress, CNMI	N/A	N/A	N/A	<p>[Of the two alternative sites, however, Tinian International Airport should be given preference in my view over Saipan International Airport for the following reasons]:</p> <p>Tinian has the necessary lodging options to support temporary personnel. Billeting for up to 700 personnel is required to support aircraft operations during a divert landing, humanitarian airlift, or military exercise event. The under-utilized Tinian Dynasty Hotel and Casino has 412 rooms capable of housing 824 temporary support personnel. Tinian also has several smaller scale hotels. While there are fewer commercial lodging options in total than on Saipan, there is sufficient capacity on Tinian; and the cost and concentration of these facilities may make Tinian a preferable alternative from the point of view of billeting.</p>	Section 2 was updated to include additional information on commercial lodging on Tinian.	Postal Mail
I120	Tinian v. Saipan: Joint Use	Political Stakeholder Congressman Gregorio Kilili Gregorio Sablan U.S. Congress,	N/A	N/A	N/A	<p>[Of the two alternative sites, however, Tinian International Airport should be given preference in my view over Saipan International Airport for the following reasons]:</p> <p>Development of the Tinian alternative could have synergistic benefit for other military activities on Tinian. A number of joint, combined, and unit-level military training activities and exercises, described and analyzed in the</p>	Based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft	Postal Mail

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		CNMI				Mariana Islands Range Complex EIS and subsequent Record of Decision, are scheduled for Tinian. Four live firing ranges are to be constructed there. These activities would benefit from renovation of the Tinian harbor to allow for safe, efficient, and reliable transportation of equipment, fuel, and military personnel. Developing the Tinian alternative for divert activities and exercises would strengthen the rationale for investment in harbor renovation and make Tinian an even more attractive location for joint-service and joint international training exercises.	EIS available the public.  Additionally, Section 5 of the EIS addresses cumulative impacts of all past, present, and reasonably foreseeable actions on Saipan and Tinian with the Divert Proposed Action.	
I121	Tinian v. Saipan: Natural Resources	Political Stakeholder Congressman Gregorio Kilili Gregorio Sablan U.S. Congress, CNMI	N/A	N/A	N/A	[Of the two alternative sites, however, Tinian International Airport should be given preference in my view over Saipan International Airport for the following reasons]: Adverse impacts on the endangered nightingale reed-warbler could be expected on Saipan. Areas surrounding the Saipan airport have been identified as critical habitat for the nightingale reed-warbler, a species listed as endangered under the Endangered Species Act. The three years of construction activities that the Saipan alternative would require, as well as the subsequent implementation of the divert operations and annual eight-week training, are likely to have an adverse impact on that habitat and require mitigation measures.  With the Tinian alternative, no threatened or endangered species are anticipated to be significantly affected in either the construction or the implementation phase. Therefore, no mitigation efforts are likely to be needed on Tinian and these costs can be avoided.	Comment noted.	Postal Mail
I122	Tinian v. Saipan: Noise	Political Stakeholder Congressman Gregorio Kilili Gregorio Sablan U.S. Congress, CNMI	N/A	N/A	N/A	Of the two alternative sites, however, Tinian International Airport should be given preference in my view over Saipan International Airport for the following reasons: 1. Noise pollution would be less of a factor on Tinian than on Saipan. There are multiple residential villages adjacent to the Saipan airport that would be heavily impacted by increased noise levels both from the construction and from the subsequent operational activities related to the Proposed Action. These villages include Koblerville, Afetnas, San Vicente, San Antonio, As Lito, and Dandan, all of which have considerable residential populations, schools, recreational areas, and tourist sites. Increased noise levels at the Tinian airport, on the other hand, would have minimal impact on the residents of	The noise analysis was revised in Section 4.1 and 4.10 based on input from the public, Headquarters Air Force, AFCEC, and FAA. A more thorough land use compatibility assessment was completed based on these revisions to the noise analysis. The USAF has also revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public. Sections 1 and 2 of the EIS have	Postal Mail

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						Tinian. The closest residential development area is over one and a half miles away. There are no schools, recreational areas, or tourist sites in the vicinity of the airport. All of the land north of the airport is currently leased by the U.S. for military use, and recent training exercises held on Tinian have demonstrated that residential areas south of the airport are exposed to very low noise levels from military construction and aircraft operations there.	been revised to discuss the Tinian leased lands. However, as further explained in the EIS, the Covenant lands are dismissed as alternatives because they do not meet the selection standards or the purpose of and need for the Proposed Action.	
I123	General	Political Stakeholder Congressman Gregorio Kilili Gregorio Sablan U.S. Congress, CNMI	N/A	N/A	N/A	I appreciate the efforts to date of the U.S. Air Force and the Department of Defense to explore all aspects of the Proposed Action and to consider all relevant public comments, especially from those who would be most impacted, the people of Tinian and Saipan. Also, I am grateful that both alternatives for the Proposed Action include improvements to existing airports in the Northern Marianas. This investment would be welcome to the islands' ailing economy and would provide much-needed jobs.	Comment noted.	Postal Mail
J124	Tinian v. Saipan	Political Stakeholder Tinian Joint Leadership	N/A	N/A	N/A	We encourage you to re-think the real purpose behind the construction of the Divert Base and recognize that utilizing the existing military land lease on Tinian gives the United States Air Force the best opportunity to fulfill its mission, now and in the future.	Based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	Postal Mail
J125	Tinian v. Saipan	Political Stakeholder Tinian Joint Leadership	N/A	N/A	N/A	However, the United States Congress and higher echelon United States Air Force decisionmakers should be aware that the draft EIS for a Divert Base in the Northern Mariana Islands is flawed both fundamentally and technically with regard to the Tinian option. There are significant costs that have not been clearly identified in either the EIS or the Executive Summary, and there are significant recent capital improvement developments on Tinian that have not been identified.	Comment noted. For further clarification, the USAF is not constructing a permanent divert "base". The Proposed Action focuses on the development and improvement of existing divert or contingency airfield capabilities and will not include the permanent deployment or "beddown" of forces in the Mariana Islands, nor will it include the development of a new airfield (e.g., new runway, new parking area) in a location that does not have existing capabilities within the Mariana Islands region. Based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives. The USAF	Postal Mail

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							is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	
J126	Tinian v. Saipan General	Political Stakeholder Tinian Joint Leadership	N/A	N/A	N/A	First and foremost, in the spirit of Governor Fitial's Military Integrated Management Council, we wish to state that the establishment of an Air Force Divert Base in the CNMI is a welcome addition to the economy of the Commonwealth of the Northern Mariana Islands, whether it is constructed on Saipan where an additional 40-some acres of land would have to be leased from the Commonwealth and provide only 87% operational resiliency to the United States Air Force, or on Tinian where military leased lands are already available at no additional cost to the United States of America and where the Air Force can obtain 100% of its operational resiliency in case of need. Pointedly, we are in full support of the constructing the Divert Base in the Commonwealth of the Northern Mariana Islands.	Comment noted. Sections 1 and 2 of the EIS have been revised to discuss the Tinian leased lands. However, as further explained in the EIS, the Covenant lands are dismissed as alternatives because they do not meet the selection standards or the purpose of and need for the Proposed Action.	Postal Mail
J127	Tinian v. Saipan: Covenant	Political Stakeholder Tinian Joint Leadership	N/A	N/A	N/A	Most important, Section 806 (a) of the Covenant provides that the United States will continue to recognize and respect the scarcity and special importance of land in the Northern Marianas. If the United States must acquire any interest in real property which it does not obtain under the Covenant, the United States will only seek to acquire such land if the public enterprise cannot be accomplished with a lesser interest. The lesser interest, in this case, would be taking advantage of the lands already under lease on Tinian. Essentially, this precludes the lease of additional lands on Saipan for a purpose that can be fulfilled on Tinian leased lands.	The EIS has been revised in Sections 1 and 2 to include a discussion of The Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America (Covenant) contained at 48 U.S.C. 1801 et seq. which recognizes the significance and scarcity of land. The EIS has also been revised to consider the Covenant lands on Tinian for the Proposed Action. Additionally, Based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	Postal Mail
J128	Tinian v. Saipan: Covenant	Political Stakeholder Tinian Joint Leadership	N/A	N/A	N/A	The Covenant is also said to be the general United States policy with respect to land acquisition in the Northern Mariana Islands. It provides significant protections against the arbitrary or improper use of the authority of the United States to acquire property in the Commonwealth. This is especially so in view of the fact that Subsection (b) provides	The EIS has been revised in Sections 1 and 2 to include a discussion of The Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America (Covenant) contained at 48 U.S.C. 1801 et	Postal Mail

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						that no interest in real property will be acquired by the United States unless the acquisition has been duly authorized by the Congress and appropriations are available to pay the landowner just compensation. It is difficult to speculate on the cost of a long-term lease on 40 acres of prime land at Saipan International Airport, however, it would certainly be in the millions of dollars - far more than the cost of repairs to the breakwater at Tinian Harbor, for instance.	seq. which recognizes the significance and scarcity of land. Based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	
J129	Tinian v. Saipan: Covenant	Political Stakeholder Tinian Joint Leadership	N/A	N/A	N/A	Finally, and most important to the people of Tinian, building the Divert Base on Tinian will begin to fulfill a 37-year-old pledge to the people of Tinian. Before the 1975 plebiscite to ratify the Covenant, representatives of the United States of America, both military and civilian, led the people of Tinian to believe that if they voted in favor of the Covenant - including the technical agreement to lease two-thirds of their island for a hundred years -- the United States would build a large multi-service training base on Tinian and the people of Tinian would benefit from the economic development. Other than for a few scattered training exercises, no significant military development has occurred on Tinian. No permanent military facilities have been built. The port of Tinian, built by Navy Seabees during World War II has been neglected, as have the access roads on the military leased lands. Building the Divert Base on Tinian will begin to allay the concerns of some Tinian residents who are now questioning the wisdom of their 1975 decision.	The EIS has been revised in Sections 1 and 2 to include a discussion of The Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America (Covenant) contained at 48 U.S.C. 1801 et seq. which recognizes the significance and scarcity of land. Based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	Postal Mail
J130	Tinian v. Saipan: Covenant  Tinian v. Saipan: Infrastructure	Political Stakeholder Tinian Joint Leadership	N/A	N/A	N/A	It is surprising that top priority in identifying the appropriate first alternative was not giving the United States Air Force the maximum long-term capability to "establish additional divert capabilities to support and conduct current, emerging, and future training activities, while ensure the capability to meet mission requirements in the event that access to Andersen Air Force Base (AFB) or other western Pacific locations is limited or denied (Cover Sheet to Draft EIS). Utilizing existing Tinian Leased Lands can give the United States Air Force 100% resiliency in case access to Andersen Air Force Base is limited or denied. Even by leasing additional land on Saipan, the United States Air Force would automatically lose 17% operational resiliency. The runway at Tinian's West Field International Airport could easily be extended to provide the runway necessary to	The EIS has been revised in Sections 1 and 2 to include a discussion of The Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America (Covenant) contained at 48 U.S.C. 1801 et seq. which recognizes the significance and scarcity of land. The EIS has also been revised to consider the Covenant lands on Tinian for the Proposed Action. However, as further explained in the Final EIS, the Covenant lands are dismissed as alternatives because they do not meet the selection standards or the purpose of and need for the Proposed Action. Based on	Postal Mail

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						accommodate the largest cargo and aerial refueling aircraft in the Air Force inventory. Even at great expense to the American tax payer, this goal could not be achieved on Saipan.	comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	
J131	Tinian v. Saipan: Infrastructure	Political Stakeholder Tinian Joint Leadership	N/A	N/A	N/A	Although it is true that Saipan has more high-end hotels than Tinian, the Tinian Dynasty Hotel and Casino has 412 rooms with a total capacity of well over 824, more than enough to support the personnel recommended in the EIS.	Comment noted. Sections 1 and 2 of the EIS have been edited to reflect a discussion of the hotel capacity of Tinian.	Postal Mail
J132	Tinian v. Saipan: Infrastructure	Political Stakeholder Tinian Joint Leadership	N/A	N/A	N/A	The draft EIS goes to lengths to discuss the "dilapidated" condition of the Tinian Harbor and the Tinian Dump. Currently, the fuel dock at Tinian Harbor is receiving extensive repairs, including a new sea wall, bollards and fenders. Recently, the Tinian joint leadership has concluded negotiations with the CPA and OLA to repair the two finger piers at the dock. This expenditure of CNMI CIP funds will undoubtedly lead to funding to repair the Breakwater. New equipment is being purchased to maintain the existing Tinian Dump, and design work is already at 30% completion for a new solid waste transfer station and a new landfill. Together, they will be more than adequate to handle all solid and liquid wastes produced by the Divert Base.	Comment noted. Sections 1 and 2 of the EIS were revised to include this recent information.	Postal Mail
J133	Tinian v. Saipan: Joint Use	Political Stakeholder Tinian Joint Leadership	N/A	N/A	N/A	The draft Air Force EIS also flies in the face of the Congressional mandate to streamline the DoD by establishing inter-service operations. This September there will be a joint Army-Navy training operation on North Field. At about the same time the III MEF will conduct a joint Navy-Marine Corps training operation on North Field. Most significantly, the recent Marine Air Group - 12 exercise on both West Field, establishing restraining wires for F-18 hot refueling operations, and on North Field, establishing an expeditionary airfield, demonstrated the island's ability to support major air operations. Despite all this joint inter-service activity on the part of the Army, Navy and Marine Corps, the Air Force-created draft EIS for a Divert Base purports to separate Air Force operations from the other services currently taking advantage of the joint-use opportunities available on existing Tinian leased lands.	Sections 1 and 2 of the EIS have been revised to discuss the Tinian leased lands. However, as further explained in the EIS, the Covenant lands are dismissed as alternatives because they do not meet the selection standards or the purpose of and need for the Proposed Action. Based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public. Section 5 of the EIS addresses cumulative impacts of all past, present, and reasonably foreseeable	Postal Mail

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							actions on Saipan and Tinian with the Divert Proposed Action.	
J134	Tinian v. Saipan: Joint Use	Political Stakeholder Tinian Joint Leadership	N/A	N/A	N/A	Technically, the draft EIS is out of date. It fails to take into account several developments on Tinian in the last 2 years. The Record of Decision issued by the US Marine Corps in September 2010 created live fire rifle ranges on Tinian, primarily for the use of the US Marine Corps, yet available to all other federal agencies with a need to maintain small arms certification. Furthermore, Tinian was visited by high ranking representatives of the Japanese Self-Defense Force (JSDF), which co-funded the recent MAG - 12 operations on Tinian. They are now considering joint USMC-JSDF training exercises on Tinian. Having a fully operational air base on Tinian with refueling capabilities will support the Marine Corps effort on Tinian, as well as joint training operations with other US and JSDF teams.	Section 5 of the EIS addresses cumulative impacts of all past, present, and reasonably foreseeable actions on Saipan and Tinian with the Divert Proposed Action.	Postal Mail
J135	Tinian v. Saipan: Natural Resources	Political Stakeholder Tinian Joint Leadership	N/A	N/A	N/A	On Tinian, there are no endangered species within the proposed divert base area that would require mitigation, whereas construction in Saipan would likely necessitate a \$600,000 deposit in the mitigation bank.	Comment noted.	Postal Mail
J136	Tinian v. Saipan: Noise Airport Ops	Political Stakeholder Tinian Joint Leadership	N/A	N/A	N/A	The population of Tinian is not 5,000 people, as stated in the EIS. It is barely 3,000. Utilizing Tinian for the planned 8 weeks per year for training exercises will interfere less with local air traffic control than on Saipan, cause less effective noise pollution for the local community, and, because of the Covenant, the Air Force will not have to pay landing fees on Tinian. During the recent MAG - 12 operation at West Field International Airport, F-18 Hornets practiced rotating hot-refueling operations throughout the day for a full week with no appreciable distress to the community. Landing KC-135s as well as fighter jets at Saipan International Airport would cause considerable distress to the local population, and particularly to Kobler Elementary School and Southern High School, both of which are in the flight pattern.	Comment noted. The EIS has been revised with the most recent U.S. Census data. The USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	Postal Mail
J137	Tinian v. Saipan: Socioeconomics	Political Stakeholder Tinian Joint Leadership	N/A	N/A	N/A	Furthermore, as noted in the draft EIS, while the construction of the Divert Base on Saipan will be of relatively minor importance to that economy, utilizing Tinian will provide a significant stimulus to the general economic development of this underdeveloped island, therefore decreasing the need for federal subsidies; building the Divert Base on Tinian will mean the completion of the West Field International Airport and the arrival of	Comment noted. For further clarification, the USAF is not constructing a permanent divert "base". The Proposed Action focuses on the development and improvement of existing divert or contingency airfield capabilities and would not include the permanent deployment or "beddown" of forces in the Mariana Islands, nor would it	Postal Mail

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						international commercial aircraft, allowing not only the importation of tourists, but the export of fresh and frozen produce and meats; completion of the Divert Base will stimulate the Army, Army Reserve, National Guard, Navy, and its Marine Corps, to take better advantage of training opportunities on Tinian.	include the development of a new airfield (e.g., new runway, new parking area) in a location that does not have existing capabilities within the Mariana Islands region. Adverse and beneficial impacts on Saipan, Tinian, and CNMI as a whole are discussed in Section 4.14. Additionally, the potential for increased air traffic and the potential for increased tourism as a result of the improved airport have been accounted for with a projected 1% increase of civilian operations at the airport.	
J138	Tinian v. Saipan: Socioeconomics  Cumulative Impacts	Political Stakeholder Tinian Joint Leadership	N/A	N/A	N/A	Furthermore, if the Divert Base is constructed on Tinian, the refueling system would make the airport fully capable of receiving foreign jet aircraft. This would undoubtedly stimulate investors who have already purchased casino licenses to begin construction on their hotel complex.	Comment noted.	Postal Mail
J139	Tinian v. Saipan	Political Stakeholder Tinian Joint Leadership	N/A	N/A	N/A	The EIS did not give sufficient importance to the transportation of ammunition from Tanapag Harbor in northern Saipan to Saipan International Airport on the very southern end of Saipan. Bombs would have to be transported through the heavily populated commercial and residential districts of western Saipan before reaching the airport. On the other hand, transporting ammunition from Tinian Harbor to West Field International Airport would pass through a very lightly populated area to nearby West Field at a much shorter distance approximately 1.5 miles.	The EIS does not discuss transportation of ammunition because transportation of ammunition is not part of the Proposed Action.	Postal Mail
K139	General	Agency Stakeholder CNMI DEQ David B. Rosario, Acting Director	N/A	N/A	N/A	Based on the information obtained at the public hearing and our review of the draft EIS, we have no significant concerns about the project at this time and believe the EIS to be sufficient. Thank you for the opportunity to comment on this proposal.	Comment noted.	Postal Mail
L140	Socioeconomics  Land Use	Agency Stakeholder Tinian Cattleman's Association Lawrence Duponcheel	N/A	N/A	N/A	If Tinian is selected as the site for the alternate Airfield, a good number of cattle ranches (ranching families) will be affected. The people of Tinian rely on these ranches as the one and only source of fresh meats and sometimes produce for family consumption. Our ranches provide work, income, and food security for island residents. That being said, any plans for expanding the airstrips or boundaries of	Cattle ranching occurs on the military lease-back area north of the Tinian airport. It is recognized that potential grazing lands may be affected on Tinian. The impact on potential grazing lands is provided in Section 4.14.	Web site

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						any type that might affect these ranches should provide consideration and support where appropriate. If at all possible, grazing areas should be incorporated into the planned facility, just as they are on other bases which allow farming and ranching within their limits.		
M141	Cumulative Impacts	Agency Stakeholder Guam DAWR Commentor: JQ	5-2	1	Table 5.2-1	Table 5.2-1 does not show the amount of habitat being removed for all of the projects listed. The amount of habitat altered and/or cleared should be included in the Table to show cumulative impacts to wildlife habitat.	All projects are contingent upon approval and funding by the US Congress; because funding has not yet been approved for these projects, total acreage that could be cleared would not necessarily add to the cumulative impact discussion.	Postal Mail
M142	Cumulative Impacts: Mitigation	Agency Stakeholder Guam DAWR Commentor: JQ	5-14	7-8	5.3.4.1	BMPs should be implemented in duration of construction and post-construction phase and soil monitoring should be implemented to assess and manage any potential impacts to adjacent sites, such as erosion during a heavy rain storm.	BMPs would be implemented during and after construction as needed and would be outlined in an ESCP. BMPs are summarized in Section 4.16 in the EIS.	Postal Mail
M143	Cumulative Impacts: Mitigation	Agency Stakeholder Guam DAWR Commentor: JQ	5-14	33-35	5.3.5.1	Continuous implementation of erosion and sedimentation controls and storm water pollution prevention at the construction sites during and when construction is completed is necessary to prevent or minimize potential cumulative impacts on water resources nearby. Control devices implemented must be monitored in duration of the construction period.	BMPs would be implemented during and after construction as needed and would be outlined in an ESCP and a SWPPP. BMPs are summarized in Section 4.16 in the EIS.	Postal Mail
M144	Geological Resources and Soils	Agency Stakeholder Guam DAWR Commentor: JQ	3-25	1-25	N/A	Text: Limestones and calcareous deposits compose about 90 percent of the surficial geology on Saipan, with volcanic rocks exposed on 10 percent of the land surface (from erosion and weathering.) Comment: Mitigation to control and further prevent erosion at the proposed site must be implemented the duration of the project and thereafter. Methods should not be restricted or limited to silt curtains, other methods should be employed and managed accordingly for effectiveness	BMPs would be implemented during and after construction as needed and would be outlined in an ESCP and an SWPPP. BMPs are summarized in Section 4.16 in the EIS.	Postal Mail
M145	Geological Resources and Soils	Agency Stakeholder Guam DAWR Commentor: JQ	3-25	3-12	N/A	Text: Limestones in Saipan are also highly permeable, which indicates connectivity of pores within the rock. A rock with a higher permeability has a greater ability to transmit the flow of groundwater. Volcanic rocks on Saipan typically are poorly sorted and have undergone secondary alteration that inhibits the flow of groundwater. However, faults transect the island in a north-northeast direction, complicating the sequence and porosities/permeabilities of	BMPs would be implemented prior to and after construction and would be outlined in a Spill Prevention, Control, and Countermeasure (SPCC) Plan. BMPs are summarized in Section 4.16 in the EIS.	Postal Mail

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						rock units (DON 2010b). Porosity, permeability, and groundwater are further ... Comment: Contractors and the Military (AF) must develop and implement mitigation to prevent any petroleum fuel leakage to exposed limestone surface in duration of project construction and duration of military activities.		
M146	Geological Resources and Soils	Agency Stakeholder Guam DAWR Commentor: JQ	5-14	11	5.3.4.1	Soil surveys should also be conducted at least quarterly, post construction phase, after project is completed and training occurs. This will help determine if soils are contaminated which allows remediation efforts to take place.	Comment noted. The USAF does not expect any impacts to soils resulting from contamination and will work with federal and local environmental agencies to assure all preventative measures and monitoring are current for all activities. Should spills occur, the USAF would follow a SPCC Plan approved by the appropriate environmental agencies. BMPs are summarized in Section 4.16 in the EIS.	Postal Mail
M147	Marine Bio	Agency Stakeholder Guam DAWR Commenter: JQ	3-60, 3-61	41-43/1-10	3.7.2	The sea turtle section references a Kolinski 1999 survey/study published in 2001; 11 years ago. Recent information regarding sea turtles in Saipan should be included in the Final EIS. Sea turtle movements and behavior in Saipan, especially within the project area is needed information to determine 'specific' mitigation. Upgrading GSN, requires more lighting, and removal of a 'natural' barrier, existing forest, may have an impact on sea turtles	Based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives that eliminates some of the lighting at the airport originally proposed. Text added to the EIS in Section 4.7 to provide more recent information and: clarify that no forest vegetation will be removed from the ends of the runways, that parking area lighting would be more than 0.5 miles from any nesting beaches, and that the lighting is not considered additional lighting because only the existing terminal lighting would be expanded. Additionally, lights at the port facility would not be pointed towards the harbor. Also, there is no nesting beach at the harbor.	Postal Mail
M148	Marine Bio	Agency Stakeholder	4-67	25-26	4.7.1.1	The proposed project requires clearing and grading and as a result soil will be loosened and may run-off during a heavy rains or continuous rain. Mitigation to control erosion or run-off will need to be addressed during construction and implementation phase.	BMPs would be implemented during and after construction and would be outlined in an ESCP and an SWPPP. BMPs are summarized in Section 4.16 in the EIS.	Postal Mail
M149	Marine Bio	Agency Stakeholder	4-68	3-8	4.7.1.2	Aside from noise impacts, visual cues may impact sea turtles. Visuals such as lighting may have an impact on sea	Based on comments received on the DEIS and coordination of federal and local	Postal Mail

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		Guam DAWR Commenter: JQ				turtle behavior. Lighting devices at GSN, especially near the coast, must be 'turtle friendly' lighting.	stakeholders and the public, the USAF has developed modified alternatives. Text added to the EIS in Section 4.7 to provide more recent information and: clarify that no forest vegetation will be removed from the ends of the runways, that parking area lighting would be more than 0.5 miles from any nesting beaches, and that the lighting is not considered additional lighting because only the existing lighting would be expanded. The USAF concludes that enhancement of existing lighting would not affect nesting sea turtle behavior. Additionally, lights at the port facility would not be pointed towards the harbor. Also, there is no nesting beach at the harbor.	
M150	Marine Bio	Agency Stakeholder Guam DAWR Commenter: JQ	5-16	13-21	5.3.7.1	The section describes impacts to sea turtles from the expected increase in noise during DoD redevelopment project and low-flying aircrafts. Of concern, that needs to be addressed is the impact on sea turtles from lights associated to the proposed project. The extension of the runway and new additions of buildings will require some lighting, increasing the exposure of lighting pollution to sea turtles that may be present offshore at GSN. The FEIS should mention impacts caused by lighting. Nests should be monitored during activities.	Based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives. Text added to the EIS in Section 4.7 to provide more recent information and: clarify that no forest vegetation will be removed from the ends of the runways, that parking area lighting would be more than 0.5 miles from any nesting beaches, and that the lighting is not considered additional lighting because only the existing lighting would be expanded. The USAF concludes that enhancement of existing lighting would not affect nesting sea turtle behavior. Additionally, lights at the port facility would not be pointed towards the harbor. Also, there is no nesting beach at the harbor. Because of the lack of impacts, the USAF does not plan to monitor turtle nests.	Postal Mail
M151	Natural Resources	Agency Stakeholder Guam DAWR Commenter: JQ	3-48	32-33	N/A	Native skink and gecko species are known at the preferred alternative sites. Surveys must be conducted to determine absence/presence and mitigation should be developed and implemented in duration of construction activity at the preferred Alternative site.	Section 4.6 acknowledges that some skinks and geckos might be killed during construction. All applicable CNMI laws and regulations will be followed to protect native species; however, the USAF does not	Postal Mail

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							plan to conduct surveys or develop mitigation for skinks and geckos.	
M152	Natural Resources	Agency Stakeholder Guam DAWR Commenter: JQ	3-49	5-7	N/A	The Mariana swiftlet is known to forage in areas abundant with insects, and does not restrict its foraging territories to 'nature forest habitats.' It is known that the swiftlet forages in variety of habitat types. What may not be known is the distance, away from roosting caves to foraging territories?	The text was modified in Section 3.6 to state the distance to the nearest known roosting cave on Saipan and to describe foraging habitat for this species better.	Postal Mail
M153	Natural Resources	Agency Stakeholder Guam DAWR Commenter: JQ	3-49	5-7	N/A	On page 3-39, lines 15-18, describes the canopy vegetation in the Tangtangan forest. The trees identified include; Premna, Ficus, Aidia, Morinda, Carica, and Albizia. Abundance of these tree species may not be abundant, although are present, but minimal. They serve as roosting and foraging trees for the fruit bat and should still be considered. The Final EIS must identify that these Tangtangan forest with minimal presence of the trees mentioned earlier has the potential for fruit bat habitat; and should not be 'ruled-out'.	The text was modified in Section 4.6 to summarize the results of surveys conducted in January–April 2012 and to clarify that the areas that would be cleared is not suitable habitat for roosting or foraging fruit bats.	Postal Mail
M154	Natural Resources	Agency Stakeholder Guam DAWR Commenter: JQ	3-49	8-12	N/A	Due to the potential of standing water in the project area, moorhens may be attracted. For the purpose of NEPA, the chances of moorhens being present at the project site is not truly known, not much is known what time of the day the 10 weeks of surveys were; it is known that moorhens move about in the evening and are attracted to freshwater habitats (including standing water after a heavy downpour). Mitigation actions must be developed and implemented to address moorhens and all other species that 'may be attracted' at the project site	Moorhens using any nearby surface waters, such as the airport detention basin or golf course ponds west of the runway could be temporarily displaced during construction and divert exercises, but would not otherwise be adversely affected by project activities. The USAF received a not likely to adversely affect determination from USFWS for moorhens in the <i>Biological Opinion for Divert Activities and Exercises, at Saipan International Airport, CNMI</i> . All documentation supporting Section 7 consultation with USFWS is included in Appendix B of the EIS.	Postal Mail
M155	Natural Resources	Agency Stakeholder Guam DAWR Commenter: JQ	4-63	18-19	4.6.1.2	T&E species that occur at the proposed project site, or adjacent to, are accustomed with the existing conditions present at GSN. With an expected increase of 5.9 aircraft operations, noise (and overflight shadows) may cause disturbance to protected species. For example: opening of North runway at AAFB, fruit bat colonies declined after North runway was open and used periodically. 40+ bats were observed prior to opening the runway and slowly declined at the colony soon after the North runway was	The effects of noise on threatened and endangered species are addressed in Sections 4.6. Additionally, the USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern	Postal Mail

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						opened.		
M156	Natural Resources	Agency Stakeholder Guam DAWR Commenter: JQ	4-63	22-23	4.6.1.2	As stated earlier in the DEIS (Ch. 3), there is no 'permanent' wetland at the proposed project site, however there is standing water accumulated after a rainfall. The DEIS also indicated there is the 'potential' this area may attract migratory birds, the moorhen, and the megapode. The presence of standing water that may attract species to the area must be addressed to prevent any protected species in the area that may be harmed by the construction and/or implementation of the proposed action.	As part of the USAF Bird Hazard Safety program, all attempts are made to assure wildlife is not encouraged to forage or use areas adjacent to operating areas. Through proper wildlife management, including limiting the locations for temporary standing water, USAF would minimize any potential for effects on moorhens, migratory birds, and other species. The project would not result in an increase in standing water in areas where wildlife could be harmed by project or airport activities.	Postal Mail
M157	Natural Resources	Agency Stakeholder Guam DAWR Commenter: JQ	4-63	24	4.6.2	Comments addressed under Alternative 1 (GSN; the preferred alternative) applies to Alternative 2 (TNI).	Comment noted.	Postal Mail
M158	Natural Resources	Agency Stakeholder Guam DAWR Commenter: JQ	5-16	22-28	5.3.7.1	Beside Noise, the FEIS will need to identify all possible impacts, to the wildlife and their habitats of Saipan and Tinian. In addition, the FEIS will need to reference studies determining whether marine mammals, sea turtles, or other marine organisms are 'extremely unlikely to be repeatedly exposed to low-altitude overflights.' The expected 'overuse' of GSN due to meet the mission for the USAF for the MIRC, MITT, ISR/Strike activities, will happen. Exposure to the additional noise, lighting, burning jet fuels, will have a cumulative impact to the wildlife present on land and nearshore.	All potential impacts of the alternatives on wildlife and their habitats are addressed in Section 4.6. Potential impacts on marine mammals, including sea turtles, are addressed in Section 4.7. As described in that section, little information regarding the reaction of sea turtles to fixed-wing aircraft overflights is available. The USAF disagrees that there would be an overuse to meet military missions because the airport would only be used for up to 8 weeks per year for training. Impacts related to marine species caused by training missions within the MIRC are analyzed and approved under the MIRC letter of authorization and the MITT EIS and associated Biological Opinion completed in July 2015.	Postal Mail
M159	Natural Resources: Mitigation	Agency Stakeholder Guam DAWR	3-39	Table 3.6-1	N/A	Vegetation community within the proposed action are communities important to seasonal migratory birds protected under the MBTA (mowed fields). Tangantangan	The USAF consulted formally with the USFWS under Section 7 of the Endangered Species Act to determine the effect on	Postal Mail

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		Commenter: JQ				forest are important habitat for foraging and nesting like the yellow bittern and Endangered reed warbler. Mitigation actions must be developed and implemented to avoid harm to nesting, foraging, perching birds protected under the MBTA and ESA.	species and the mitigation required. All materials supporting the Section 7 consultation, to include the Biological Opinion, are included in Appendix B of the EIS.	
M160	Natural Resources: Mitigation	Agency Stakeholder Guam DAWR Commenter: JQ	3-48	4-8	N/A	Mitigation to minimize or avoid alteration to the normal behavior for the black noddies, a protected species under the MBTA, must be developed and implemented. Nesting birds should be monitored in duration of construction and military training activities.	As required by the Migratory Bird Treaty Act, construction activities would not destroy nests of black noddies or any other migratory birds. The USAF would monitor any active nests discovered during construction activities to ensure that those nests are not destroyed.	Postal Mail
M161	Natural Resources: Mitigation	Agency Stakeholder Guam DAWR Commenter: JQ	3-48	11-14	N/A	The lake and ponds within the proposed project site (Golf course ponds) is known to attract the endangered Mariana common moorhen. Mitigation must be developed and implemented to avoid and minimize impacts to the protected species. Moorhens are known to move about during the evening hours from site to site, therefore, mitigation must address time of day activities for the species.	The USAF consulted formally with the USFWS under Section 7 of the Endangered Species Act to determine the effect on the species and the mitigation required. All materials supporting the Section 7 consultation, to include the Biological Opinion, are included in Appendix B of the EIS.	Postal Mail
M162	Natural Resources: Mitigation	Agency Stakeholder Guam DAWR Commenter: JQ	3-48	18-19	N/A	Lessor plover and moorhen movements around Saipan should be known to define mitigation actions for the proposed activity in GSN. Mitigation to avoid harm and harassment changes to normal behavior to protected species must be addressed and is required under the MBTA and ESA.	Specific information on the movements of these species is not required to evaluate potential impacts. The USAF would implement all measures required to comply with the Endangered Species Act and the Migratory Bird Treaty Act.	Postal Mail
M163	Natural Resources: Mitigation	Agency Stakeholder Guam DAWR Commenter: JQ	4-30	27-28	4.2.1.1	A black noddy rookery, with 60 active nests, was discovered approximately 675 feet from the proposed project sites for construction. Mitigation to prevent dust from impacting nest activities must be implemented in duration of the construction phase.	As stated in Section 4.2, fugitive dust-control measures would be employed during construction to minimize dust emissions.	Postal Mail
M164	Natural Resources: Mitigation	Agency Stakeholder Guam DAWR Commenter: JQ	4-59	20-21	4.6.1.1	Noise from construction will impact breeding activities for birds in the area. Mitigation should include the monitoring of nesting activities during the construction phase.	The USAF would implement all measures required to comply with the Migratory Bird Treaty Act. Monitoring of the response of migratory birds to noise is not required by that Act. However, USAF and USFW will coordinate throughout the project for issues including potential effects on birds covered under the MBTA	Postal Mail
M165	Natural	Agency	4-60	1-11	4.6.1.1	Not too sure how USAF determines that behavioral change,	The USAF consulted formally with the	Postal Mail

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	Resources: Mitigation	Stakeholder Guam DAWR Commenter: JQ				disorientation, hearing loss, displacement, increased mortality, as the result of unavoidable direct impacts associated with construction activities would be minor. Majority of the bird species identified within or adjacent to the proposed project site are special-status species, protected under the MBTA and ESA. USAF must mitigate on impacts to wildlife. There must be a fine balance to meet the requirements of the military mission and nature.	USFWS under Section 7 of the Endangered Species Act to determine the effect on the species and the mitigation required. All materials supporting the Section 7 consultation, to include the Biological Opinion, are included in Appendix B of the EIS. As described in Section 4.6, the conclusion that impacts of noise will be minor was based on the existing noise levels in the area and the infrequent and short-term increase in noise that would occur during exercises. The USAF will implement all measures required within the Biological Opinion provided in EIS Appendix B to comply with the Endangered Species Act and the Migratory Bird Treaty Act.	
M166	Natural Resources: Mitigation	Agency Stakeholder Guam DAWR Commenter: JQ	4-62	41-42	4.6.1.2	5.9 increase of air operations is expected at GSN. Wildlife may be 'accustomed' to existing conditions, but may respond differently with the expected increase. Increase air traffic could result to disturbance on nesting birds resulting nest abandonment, or neonates falling off the nest. Biologists must be present to monitor nesting activities during exercises and/or during use of GSN.	Section 4.6 acknowledges that noise could adversely affect wildlife. Monitoring of the effects of noise on wildlife is not routinely done at other airports.	Postal Mail
M167	Noise	Agency Stakeholder Guam DAWR Commenter: JQ	3-3	3	N/A	Text: The noise analysis contained in the Draft EIS is based upon readily available background information and data that were current at the time of the analysis. Refinement of the noise analysis is an ongoing process and will be finalized based on Draft EIS comments prior to the final EIS. Comment: Noise analysis should include impacts to migratory birds and endangered species in the area. Noise impacts on protected species should be determined and mitigated to avoid any "harm, harassment, or alteration" to the protected species behavior	Assessment of impacts on migratory birds and endangered species from noise has been included in the EIS in Section 4.6 and the BA/BO as coordinated with the USFWS.	Postal Mail
M168	Noise Natural Resources: Mitigation	Agency Stakeholder Guam DAWR Commenter: JQ	4-3	21-28	4.1.1.2	DEIS does not indicate the preferred option for Alternative 1 (low, medium, or high scenario). Nor does the DEIS indicate what exact month implementation (use of GSN) will take place. As described in Ch. 3, Biological resources, protected species are known to nest at certain times of year. Mitigation to avoid nesting activity must be	Impacts on migratory birds and endangered species from noise have been included in the EIS and the BA/BO as coordinated with the USFWS.	Postal Mail

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						developed and implemented		
N169	Land Use	Agency Stakeholder CPA Edward M. Deleon Guerrero	N/A	N/A	N/A	Availability of Land on Tinian Section 803 of the Covenant provides for joint use of the Tinian International Airport. To date, the U.S. Armed Forces have failed to fully utilize TNI to its fullest potential. Section 2.2.1 states that selection standards required for the airfield must include existing land and infrastructure with expansion capabilities and it must be located within the MIRC training area. Tinian fits that bill. Although there is no current fuel farm located on Tinian, any added cost of constructing a fuel farm on Tinian will be outweighed by the benefit of concentrating all proposed military activities on Tinian as there is sufficient land to accomplish its goals and objectives in Tinian.	Comment noted. Based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	Postal Mail
N170	Mitigation	Agency Stakeholder CPA Edward M. Deleon Guerrero	N/A	N/A	N/A	<i>The Best Alternative: Alternative 2 TNI</i> While CPA recognizes that the CNMI will continue to play a critically important role in U.S. military efforts in the Asia Pacific region, we must remind you that the Divert Activities and Exercise program as proposed, with its first alternative being Saipan and its second alternative being Tinian, will impact our environment and create a myriad of financial, social, and cultural burdens for the people of the Commonwealth. CPA understands that there are possible mitigation proposals to deal with the various impacts, including best management practices and design concepts to avoid adverse impacts. However those specific measures have not been identified in the DEIS.	Based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public. The ROD will officially specify which airport the USAF elects to use as its Divert Activities and Exercises location, or will announce selection of the No Action Alternative. Through the NEPA process, PACAF and USAF are considering at all potential impacts on Saipan and Tinian and the CNMI. Mitigation measures and best management practices were added to Section 4.16 of the EIS. Mitigation measures and BMPs are also discussed in Section 4 under the respective resource area and will be identified in the ROD	Postal Mail
N171	Noise	Agency Stakeholder CPA Edward M. Deleon Guerrero	N/A	N/A	N/A	Impact of Noise Environment at GSN and TNI Although the DEIS distinguishes between three possible noise level scenarios (Low, Medium and High), CPA feels that any scenario will negatively affect the noise environment of Saipan thereby affecting its residents, visitors, and CPA employees. CPA therefore feels it is	The USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised	Postal Mail

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						<p>prudent to comment on the High Scenario. Under the High Scenario, periodic, direct, moderate to major, adverse impacts on the noise environment would be expected (page 4-9). The DEIS estimates that there would be four operations per day for twelve F-16 and F-22 aircrafts. This would total 48 operations per day. Although the DEIS states that the Divert Activity and Exercises would only be for 8 weeks and the majority of the operations would be completed from 7:00 a.m. to 10 p.m., such operation would still severely impact Saipan's noise environment. Even though a majority of the operation would be conducted before 10:00 p.m., thirty percent of the operation would still be conducted from 10:00 p.m. to 7:00 a.m. All total, Saipan residents and visitors would have to endure fourteen F-16 and F-22 operations from 10:00 p.m. and 7:00 a.m. Saipan's main industry is tourism. Tourists flock to Saipan to enjoy its clean beaches and peaceful environment. Surrounding tourist facilities include Coral Ocean Point and Lao Loa Bay Resort. It is CPA's position that both resorts will inevitably be negatively impacted by the high noise level resulting from the proposed action. Moreover, residents in surrounding residential areas such as Dandan, Koblerville, Aslito and Kagman will also be victims of the high level of noise. It is important to note that the first three aforementioned areas are all within the High Scenario Noise Contours at GSN. See Figure 4.1-3, page 4-11. Alternatively, TNI Is located away from the concentrated populations of San Jose Village, Marpo Heights, and Carolina Heights. Noise impact will be concentrated on the northern end of Tinian, away from the main residential areas. CPA believes that there should nonetheless be noise mitigation. This could be accomplished by requiring that all aircrafts approaching TNI avoid flying over San Jose Village.</p>	proposed action and alternatives by making a Revised Draft EIS available the public.	
N172	Tinian v. Saipan	Agency Stakeholder CPA Edward M. Deleon Guerrero	N/A	N/A	N/A	<p>CPA is mindful that the proposed action will not only consist of Air Force Divert Landings and Exercises and humanitarian airlift staging, but will also consist of joint military exercises with U.S. Navy, U.S. Marine Corps, and military from other countries to meet U.S. national security interests. CPA wants to ensure that any negative socio-economic impacts associated with the proposed action are at a minimum mitigated through federal efforts or in the</p>	<p>Through the NEPA process, PACAF and USAF are considering all potential impacts on Saipan and Tinian and the CNMI. Based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives. The USAF is providing an additional opportunity to</p>	Postal Mail

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						alternative outweighed by the economic benefits the proposed action will bring to the CNMI. Therefore, given the potential impacts the proposed action will have on the CNMI as a whole, CPA recommend that Alternative 2 TNI be selected as we feel that Tinian is the best alternative for all stakeholders.	comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public. Mitigation measures and best management practices were added to Section 4.16 of the EIS. Mitigation measures and BMPs are also discussed in Section 4 under the respective resource area and will be identified in the ROD	
N173	Cultural Resources Cumulative Impacts	Agency Stakeholder CPA Edward M. Deleon Guerrero	N/A	N/A	N/A	Impact of Cultural Resources at GSN and TNI The Saipan International Airport sits on what was once Aslito/Isley Field and is designated as a historic landmark under the National Park Service. Along with the air fields, there are several Japanese bunkers, buildings and other structures that were eventually used by the U.S. forces during World War II. The historic and cultural significance of the former Aslito/Isley Field and its surrounding buildings and structures is profound. In the nine month period between November 1944 and Japan's unconditional surrender in August 1945, Army Air Force B-29s conducted long-range raids against Japanese industrial and urban targets from Saipan thereby contributing to the eventual end of World War II. Section 5.3.8.1 specifically states that the historic structures are susceptible to secondary impacts from vibrating related deterioration due to heavy aircraft traffic at the parking aprons and increased vehicle traffic and personnel presence. CPA is understandably concerned that the proposed action will threaten the historic and cultural resources at Aslito/Isley Field. Moreover, it is unclear what mitigation efforts would be used by PACAF to minimize any potential deterioration of such resources.  Although there will be potential cumulative impacts on Tinian historic and cultural sites as a result of the proposed action, those sites are not located on TNI. Therefore, there would be less of a burden on Tinian historic/cultural sites than to GSN which sits on an actual historical landmark.	Through the NEPA process, the USAF is considering all potential impacts on Saipan and Tinian and the CNMI. Mitigation measures and BMPs were added to Section 4.16 of the EIS. Mitigation measures and BMPs are also discussed in Section 4 under the respective resource area and will be identified in the ROD. The USAF is undergoing Section 106 consultation with the CNMI HPO, NPS, ACHP, and other interested parties under Section 106 of the NHPA and cultural resources provisions in NEPA for divert activities and exercises. PACAF has revised the scope of the Undertaking in coordination with CNMI officials. Now, PACAF seeks to complete the Section 106 process and parallel procedures under the National Environmental Policy Act (NEPA) for an Environmental Impact Statement (EIS). In this regard, Pacific Air Forces (PACAF) worked to redefine the Area of Potential Effect (APE) and to make a formal finding of effect for which concurrence was requested. The Section 106 process took place as laid out in 36 Code of Federal Regulations (CFR) 800. This information has been clarified in the Revised Draft EIS, specifically in Sections 3.8 and 4.8, and all documentation in support of the Section 106 consultation process is contained in Appendix D of the EIS.	Postal Mail
N174	General	Agency	N/A	N/A	N/A	CPA supports Pacific Air Force (PACAF)'s mission to	Comment noted.	Postal Mail

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		Stakeholder CPA Edward M. Deleon Guerrero				provide ready air and space power to promote U.S. interests in the Asia Pacific Region. Specifically, CPA supports the establishment of an Air Force Divert Base on the island of Tinian. CPA understands that PACAF's first preference for divert activities and exercises is Saipan. However, CPA agrees with CNMI Governor Benigno R. Fitial and Tinian Mayor Ramon M. Dela Cruz that any divert activities in the CNMI should be located on Tinian.  CPA's comments are meant to constructively point out possible consequences caused by PACAF's proposed action in this draft environmental impact statement and to offer solutions in the process. CPA trusts that its comments and concerns will be taken into consideration.		
N175	General	Agency Stakeholder CPA Edward M. Deleon Guerrero	N/A	N/A	N/A	PACAF must work closely with FAA Given the several requirements for the set-up of the runway, lightings, markings, munitions, etc., it is extremely important that PACAF work closely with AA to ensure compliance with all FAA rules and regulations. PACAF must know that any attempt to alter or replace any mechanism at GSN or TNI will require FAA approval.	FAA is a cooperating agency on this project and has been working with PACAF and USAF since its beginning. PACAF and USAF understand that any attempt to alter the airport will require FAA approval and will continue to work with FAA and CPA to ensure that all parties are in agreement and approval of any proposed alterations or replacements. FAA will be required to consider the Final EIS and adopt it prior to approval of the amended airport layout plan. This information is explained in Section 1 of the EIS.	Postal Mail
O175	Cumulative Impacts	Public Teresa Arriola	N/A	N/A	N/A	My concern is that really that I'd like a little more clarity on the overall connection, or lack thereof, of the proposed actions being discussed tonight and the overall military buildup or marine relocation and the MIRC in the CNMI. I'm unsure how this connects or not with broader projects the U.S. military is conducting in the region.	The Divert Activities and Exercises proposal is not directly connected to the Guam Military Build-up and Relocation or the MIRC. The Guam Build-up is an entirely separate action from the Divert Activities and Exercises. The MIRC is a land and sea training study area within which the Divert Activities and Exercises could occur. All air exercises that would be completed under the Divert proposal are analyzed and below the threshold of the training analyzed within the MIRC.  Additionally, Section 5 of the EIS addresses cumulative impacts of all past, present, and reasonably foreseeable actions on Saipan and Tinian with the Divert Proposed Action.	Saipan Public Hearing Verbal Comment

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O176	General	Public Rosiky Camacho	N/A	N/A	N/A	Sir, I think it's not very clear on the -- the airport. I'd like to comment that, you know, the share activities that is going on, has been slightly been mentioned, I'd like that to be written in more formal and what good it comes out, out of that share activities existing if you use Saipan. Second is, I'd like to emphasize the surrounding areas especially the schools and southern high school -- then you have the elementary. And just to brief comment -- actually we brought this up in a coffee shop and a lot of people said that there is commerce, the money is coming in due to this activities that the Air Force is coming in to use the airport. And I hope that is true. And my biggest question now is -- and I think it brought up tonight; is that what remedies that the Air Force or the military can assist us in case something really happen? I like this hearing because we can comment.	The Divert Activities and Exercises proposal is not associated with the Guam Military Buildup. The Air Force is aware of the schools near the airport and has conducted a special outreach for these communities. Additionally, the USAF proposes to remove fighter jets from its proposal and reduce the number of KC-135 operations, thereby eliminating the noise concern to the potentially affected communities. The USAF operates with the utmost safety in mind and assures all activities minimize any adverse affect on the surrounding community. Analysis in the EIS indicates that the Proposed Action would have beneficial socioeconomic impacts in Saipan. The primary mission of Pacific Air Forces is to provide ready air and space power to promote U.S. interests in the Asia Pacific region during peacetime, through crisis, and in war and the Divert Activities would support that mission. Comment noted.	Saipan Public Hearing Verbal Comment
O177	General	Public Ruth Tighe	N/A	N/A	N/A	I wanted to note that I appreciate receiving a hard copy of the EIS in time to review it before the hearing. It was very helpful to me. I found it comprehensive -- comprehensive and readable with less charting than many other EIS reports I've seen. I may be putting my foot in my mouth but I support the implementation of the project and I support the implementation of it on Saipan because I believe that it would provide some much needed boost to our economy.	Comment noted.	Saipan Public Hearing Verbal Comment
O178	Mitigation	Public Ruth Tighe	N/A	N/A	N/A	I hope that the Air Force holds up to its promise to use best management practices, especially with science and compliance with like NEPA and historic preservation.	The EIS contains mitigation measures and BMPs, as appropriate, which are summarized in Section 4.16.	Saipan Public Hearing Verbal Comment
O179	Mitigation	Public Teresa Arriola	N/A	N/A	N/A	Secondly, I have a concern for how mitigating efforts by the military will be completed after the EIS comes out with the final version, or the ROD. For example, if somebody has a concern about something that's happening because of a proposed impact, what can they do; can they say anything and how will it be included within the thing that the military does to mitigate?	The EIS contains mitigation measures and BMPs, as appropriate, which are summarized in Section 4.16. Should the general public be unsatisfied with the proposed mitigation measures, they should contact the regulatory authority with oversight for the particular resource area requiring mitigation.	Saipan Public Hearing Verbal Comment

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O180	Natural Resources	Public Rosiky Camacho	N/A	N/A	N/A	The other concern is, I've been listening, and that's about, you know, that building up there that is unfinished? The hotel? There is a surrounding there that there's some habitats. And I hope that they don't move to where I live. But -- because I live about four blocks. And I hope that if those habitats, those birds, native species move to my place, now I become endangered, and what consequences can I take? And that's the concern.	The proposed project would not affect any habitat near the unfinished hotel or any protected species living in areas surrounding that building.	Saipan Public Hearing Verbal Comment
O181	Noise	Public Rosiky Camacho	N/A	N/A	N/A	My biggest concern is I live in two areas in the south, over in Aslito. And in Kobeler, I am actually further away from the airport. But the noise in Kobeler is practically higher in terms of vibration, so. When I move to Aslito, which is about two minutes walk, I don't have that vibration. Looking at your results on your decibels, my problem is this, is the consequences. Let's say for example, my tenant that is in Kobeler so decided that, you know, your base is not good in this area. So, they left. Now I end up with no tenant. And if the tenant so decided that -- she decided, they decided, because of that noise level is just bothering them, what action can I take? That's my concern.	The noise analysis was revised based on input from the public, Headquarters Air Force, AFCEC, and FAA. A more thorough land use compatibility assessment was completed based on these revisions to the noise analysis in Sections 4.1 and 4.10. Additionally, the USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	Saipan Public Hearing Verbal Comment
O182	Noise	Public Rosiky Camacho	N/A	N/A	N/A	But my biggest concern is consequences and the impact that this activity that is going on. Just to brief, even the island of Guam from 75 to 79 Toto/Mongmong; and back then I have experienced those noise. And then I move on to Saipan in '84 and I have experience those noise. And I hope that those noise doesn't affect the environment.	The USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	Saipan Public Hearing Verbal Comment
O183	Noise	Public Rosiky Camacho	N/A	N/A	N/A	The other biggest concern is I looked at your contour and it seems that the level of decibels is kind of 65 dba; right? And if you look at the mass land area, it's about half of the population of Saipan. And what I'm saying is it seems half population of Saipan is affected. It makes more sense to protect the human.	The noise analysis was revised based on input from the public, Headquarters Air Force, AFCEC, and FAA. A more thorough land use compatibility assessment was completed based on these revisions to the noise analysis in Sections 4.1 and 4.10. Additionally, the USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised	Saipan Public Hearing Verbal Comment

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							proposed action and alternatives by making a Revised Draft EIS available the public.	
O184	Proposed Action	Public James Arriola	N/A	N/A	N/A	However, I have heard on several occasions to enquire on the proposed project that all of the items that are going to be conducted -- conducted are in line with the laws and policies and procedures of other entities aside from those people who are living here. And my comment and my concern would be that although perhaps the items may have been translated into the opinion of someone from the United States as rudimentary, the majority of our population does not -- might not have the access or understanding of the terminology utilized in such a -- such an -- impacting item such as this in our country in the Commonwealth. And so therefore, my largest concern will be that although you may have complied with the law, to be considerate perhaps in the future of other alternatives that are in line with the indigenous people or local residents of this island, particularly in those who are not English speakers, inclusive of the form, which is also not very culturally competent in a manner in which is conducted. So, if this item does pass, my concern is the vast majority of the indigenous people's voices, although the law was complied with, would not be fair on how it impact us here in the Commonwealth.	Comment noted. CNMI regulatory agencies have been fully engaged with USAF on multiple issues involved with the Divert activities and exercises proposal.	Saipan Public Hearing Verbal Comment
O185	Proposed Action	Public Ruth Tighe	N/A	N/A	N/A	But I did have a question as to what the timeframe -- what timeframe has been established for the construction? We know what's going to happen to the action. But no one has spelled out when the construction will start and how long and how slow. And I wanted to get that on the record.	Comment noted.	Saipan Public Hearing Verbal Comment
O186	Proposed Action	Public Teresa Arriola	N/A	N/A	N/A	I guess if it's -- if things are being put on the record tonight, I think it's also important to recognize that on the record it should be known that not everybody -- unlike Ms. Tighe here, I noticed that you did support -- you do express your support. I think it's important to recognize the -- that there are people on the island that may not even be here tonight that don't support many of the activities that the military are conducting in the area.	Comment noted.	Saipan Public Hearing Verbal Comment
O187	Tinian v. Saipan	Public Rosiky Camacho	N/A	N/A	N/A	The last concern is, probably Tinian is the best place based on the report of the Air Force, saying that there's no such big events or biological or anything affected. And I know -- I know, that's how much -- he's going to give me his time. Anyway, let me give one last one. Now, I need to find in my own heart if -- is there any action that I can take? What action can I take to protect my consumer enemies or	Comment noted.	Saipan Public Hearing Verbal Comment

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						commerce enemies?		
P188	Tinian v. Saipan: Socioeconomics	Political Stakeholder Chief of Staff to Tinian Mayor Don Farrell	N/A	N/A	N/A	The other thing is, that's simply stated, the people of Tinian sacrificed 2/3 of their island for the creation of the Commonwealth back in 1975 with the full expectation that a very large multiservice training base was going to be created on this island for the economic development of the people. And that base has never materialized. By taking this opportunity to create a divert base on Saipan which will have little advantage economically to the people of Saipan, instead placing it on Tinian, which would have tremendous economic development opportunities for the people of Tinian. They are doing a disservice to the people of Tinian; and I believe in the long run a disservice to United States Air Force and to the United States of America.	Comment noted. The EIS has been revised in Sections 1 and 2 to include a discussion of The Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America (Covenant) contained at 48 U.S.C. 1801 et seq. which recognizes the significance and scarcity of land. Additionally, Based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	Tinian Public Hearing Verbal Comment
P189	Tinian v. Saipan: Covenant	Political Stakeholder Vice Chairman for the Tinian Council Joseph Cruz	N/A	N/A	N/A	I'm the vice chairman for the Tinian Council. My comment here is, it's been years that we've been waiting for the base to be fulfilled here in Tinian. For the record, I am a son of the former Senator Jose R. Cruz, he's one who negotiate the CNMI to become a U.S. citizen. It was President Ford at that time. And I was a little boy. I remember when I went to America with my dad, and spoke to the senators; and I remember when he sang the "God Bless America". So, here am I now, and I am so honored for you guys to come and try and build the base on Tinian. So, we ask you again that you use Tinian. And we've been waiting for America to fulfill what the promise for our island of Tinian.	The EIS has been revised in Sections 1 and 2 to include a discussion of The Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America (Covenant) contained at 48 U.S.C. 1801 et seq. which recognizes the significance and scarcity of land. The EIS has also been revised to consider the Covenant lands on Tinian for the Proposed Action. However, as further explained in the Final EIS, the Covenant lands are dismissed as alternatives because they do not meet the selection standards or the purpose of and need for the Proposed Action. Additionally, based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	Tinian Public Hearing Verbal Comment
P190	Tinian v. Saipan:	Public Ike Quichocho	N/A	N/A	N/A	Please allow me to welcome all our visitors here to Tinian. I would like to express some same similar sentiment that the	Comment noted. Based on comments received on the DEIS and coordination of	Tinian Public

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	Covenant					previous speakers shared, especially what Mr. Farrell has mentioned before. People of Tinian overwhelmingly support it for the leasing of 2/3 of the island to the military, and with expectations that our small island be benefited from the military coming in. And so, you know, if -- like I said, I'm not too familiar with how that will affect our industry. But I'm not sure also whether there's still a chance that Tinian will be chosen after the EIS, when Saipan is the number 1 site.	federal and local stakeholders and the public, the USAF has developed modified alternatives. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	Hearing Verbal Comment
P191	Tinian v. Saipan: Covenant  Tinian v. Saipan: Socioeconomics	Agency Stakeholder Head of Tinian Department of Commerce Jose Kiyoshi	N/A	N/A	N/A	I'm the resident department head for the Department of Commerce here in Tinian. Hearing the Air Force searching for a divert airfield, we were happy. We were motivated with the mayor, the cabinet members, because -- that 30 years ago we gave up 2/3 of our land. There were promises made and there were promises broken. When we heard that the Air Force were looking for a divert airfield, like I said we were elated. As you guys know that our mayor is not shy of bringing or convincing the military to move here to Tinian; because one of our biggest problems is population-wise, we don't have the magnitude population. And hearing from the news that Saipan was preferred, we're kind of disappointed. Two-thirds of our land has been given away. And 30 years we're still waiting. And as you guys know that just the past few weeks, the Marine Corps left the island. When they came, the businesses were happy, the community were happy; so I hope again that the folks here, gentlemen, will bring back to the higher-ups and to please consider again trying to make any efforts in choosing. You guys have 2/3, you know, military lease land; I'm hoping that the Air Force will consider that opportunity to be used.	The EIS has been revised in Sections 1 and 2 to include a discussion of The Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America (Covenant) contained at 48 U.S.C. 1801 et seq. which recognizes the significance and scarcity of land. The EIS has also been revised to consider the Covenant lands on Tinian for the Proposed Action. However, as further explained in the Final EIS, the Covenant lands are dismissed as alternatives because they do not meet the selection standards or the purpose of and need for the Proposed Action. Additionally, based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	Tinian Public Hearing Verbal Comment
P192	Tinian v. Saipan: Socioeconomics	Public Ike Quichocho	N/A	N/A	N/A	However, I would like also to note that -- first, I'll admit that I haven't really gone through the details of the EIS and its impact. And since we can't questions and so I would also -- my concern about on one hand, I heartily support any proposed use of our island, like I said, to help our economy here. And if that -- if Tinian is chosen as the divert site and the military should invest in upgrading our airport, then that is even, you know, there for us. We also have a casino industry. And I'm not sure how that will impact our gaming industry. We may have only a single operating casino, but I am optimistic that our industry has the potential to grow;	Comment noted.	Tinian Public Hearing Verbal Comment

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						and that the Bibi area, which is near the airport -- connected to the airport, Tinian International Airport property, is down in that area is on a prime property on island that all prospective investors at that time, that might have been contacted, have expressed interest in investing in that property. So, if we build a big hotel and casino with golf course, I don't know how, what impact it is going to be. So -- hope this is very helpful. But if I will review the details and I think that it may not really affect because it would be just use this on -- only on certain short period of time, then I think that I would welcome. And if it does not affect the commercial operation side of the airport such as cancelling flights, we're hoping that -- as you can see our runway has been -- there's been a lot of improvement. And the purpose of that is to have direct flights, international, you know, flights; so we're still pursuing that.		
P193	Tinian v. Saipan: Socioeconomics	Public Ike Quichocho	N/A	N/A	N/A	But if -- you know, if that can still be changed, then please consider Tinian. I think that -- like Mr. Farrell said and some previous speakers that the people of Tinian are expecting more. We have a very disadvantaged, you know, situation being we're just so close to Saipan, everything has to be duplicated and, you know, it's a high cost of running government operation, with the employees. The bottom line is we want to have every opportunity to develop the island or to help our local economy. So, I will review the EIS and see if this -- anticipate from for you to submit a written comment.	Comment noted.	Tinian Public Hearing Verbal Comment
Q194	Natural Resources	Public Justine B. de Cruz (former Saipan biologist)	ES	Table ES-2 and Table ES-3	ES	I was surprised that the Executive Summary, especially Tables ES 2 and 3, only mentions the impacts of the proposed alternatives on wildlife as being noise, possible displacement, and habitat loss. One of the most severe potential impacts on either Saipan or Tinian is the possibility of introduction and spread of the brown treesnake. The prospective impacts of this dreaded avian predator are well described in Section 4.6.1 and it is important that they be included in the ES as well.	The Executive Summary is not intended to provide all details about potential impacts, only a qualitative summary. Because of the existence of military protocols and existing interagency agreements on the brown treesnake, it is less of a concern than it has been in the past. However, additional details about the brown treesnake have been added to the Executive Summary and Section 4.16 per comment.	Web site
Q195	Natural Resources	Public Justine B. de Cruz (former Saipan	3-42	Table 3.6-2	3.6	First, could the rats reported as being the often urban <i>Rattus norvegicus</i> have been instead the more arboreal <i>R. exulans</i> (the Pacific rat), which is common in the forests of Saipan? How did the observers distinguish among the several <i>Rattus</i> species that might be present?	The table was modified in Section 3.6 to clarify that the rats observed could have been one of the species of <i>Rattus</i> that occurs on Saipan.	Web site

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		biologist)						
Q196	Natural Resources	Public Justine B. de Cruz (former Saipan biologist)	3-42, 3-43, 3-55	Table 3.6-2 and Table 3.6-5	3.6	Second, the observers recorded Black drongos on Saipan? That would be note-worthy as the species is not usually present on the island (or on Tinian, as stated in Table 3.6-5). Some avian observers have confused starlings with drongos in the past and perhaps these identifications are also mistaken. The EIS surveyors reported seeing drongos frequently on both Saipan and Tinian (pp. 3-43 line 11, and pp. 3-55 line 9), which seems so unlikely that it is probably an error (either in transcription or identification) and the data should be verified	The inclusion of Black drongos on Saipan was an editorial error and the text was modified in Section 3.6 to correct the list of bird species observed on Saipan.	Web site
Q197	Natural Resources	Public Justine B. de Cruz (former Saipan biologist)	3-42, 3-43, 3-46, 3-55	Table 3.6-2 and Table 3.6-5	3.6	Third, although the White tern <i>Gygis alba</i> has sometimes commonly been called a fairy tern, it should not be confused with the Fairy tern <i>Sternula nereis</i> that is mostly an Australian species. <i>G. alba</i> is common on both Saipan and Tinian while <i>S. nereis</i> is not. Did the observers actually see both species as recorded in Table 3.6-2? Was the airplane strike, noted as a fairy tern (pp. 3-46 line 37), in fact the Fairy tern, or one of the island's numerous White terns? And four, Rufous fantail is, I think, the more common spelling (as opposed to 'Roufous' in both Table 3.6-2 and 3.6-5	The text and tables were revised in Section 3.6 to clarify the species observed.	Website
Q198	Natural Resources	Public Justine B. de Cruz (former Saipan biologist)	3-47, 3-48	N/A	3.6	To the list of wildlife attractant areas on pp. 3-47 and 3-48, it might be wise to add the dense, grassy wetlands extending southwest from Lake Susupe known as the CK Potholes. This area offers excellent habitat close to the airport for large water birds and flocking terns, many of which can be aircraft strike hazards	The text was modified in Section 3.6 to include the wetlands extending from Lake Susupe.	Website
Q199	Natural Resources	Public Justine B. de Cruz (former Saipan biologist)	3-49	27 and 28	3.6	On page 3-49 lines 27 and 28 (and in several other places in the document), the authors state that Section 7 consultations with the USFWS regarding impacts on endangered species, particularly the Nightingale reed-warbler and the Mariana common moorhen, are underway. Apparently the results of the consultations are not currently available and are only to be included in the final EIS. I was wondering why issuing the Draft EIS was not delayed until the consultations were completed so that the public might have a chance to comment on the proposed mitigation measures? Because "...short-term to long-term, direct and indirect, adverse impacts on threatened and endangered species would be expected from construction activities associated with the	Results of the consultations were not provided in the Draft EIS because consultations were not complete at the time the Draft EIS was published. The Air Force wanted to seek stakeholder and public input on the Proposed Action and alternatives during scoping before initiating consultation. Therefore, the consultation process was an ongoing and information on the surveys and information on consultation and input from USFWS are included in the Revised Draft EIS and the BA/BO developed in coordination with the	Web site

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						[sic] Alternative 1” (pp. 4-60 lines 42-44), would it not have been appropriate to include the supporting data for review in lieu of the opportunity to comment on the consultation results? As it stands, the Draft EIS does not give the public any information from the surveys conducted for endangered and threatened species in the proposed project area, so a critical component of the document is missing.	USFWS. See Section 4.6 and Appendix B of the EIS. The USAF is currently undergoing Section 7 consultation for the Proposed Action on Tinian	
Q200	Natural Resources	Public Justine B. de Cruz (former Saipan biologist)	N/A	Table 3.6-5	N/A	Also, Table 3.6-5 lists two types of Bridled white eyes observed during Oct reconnaissance surveys on Tinian. That is probably an error (perhaps in transcription) and should be corrected	This was an editorial error and the bridled white-eye was removed from the table in Section 3.6.	Web site
R201	Noise	Public Reo Arrioloa (Vice Principal Dandan Elementary)	N/A	N/A	N/A	The CNMI PSS requires all schools to limit use of air-conditioning during the school day. We are limited 4 hrs per day, here at Dandan we have it on 9[am]-1pm. I'm concerned about the possible noise & distraction during the times when we have our windows open (due to no aircon), here at our campus.	The noise analysis was revised based on input from the public, Headquarters Air Force, AFCEC, and FAA. A more thorough land use compatibility assessment was completed based on these revisions to the noise analysis in Sections 4.1 and 4.10. Additionally, the USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	Written Comment Form at Public Meeting
S202	Water Resources	Public Ignacio Cabrera	N/A	N/A	N/A	I think Tinian Water Quality and Recharge of Groundwater Aquifers needed to be resampled for war world II hazardous waste contamination such as Jet fuel, Arsenic and the airplane junkyard site	Water quality is important to the health of the public as a whole, and particularly important to island communities with confined water sources. However, testing and remediation of groundwater outside the geographic scope of the Proposed Action on Tinian alternative is not anticipated under the Proposed Action.	Web site
T203	Tinian v. Saipan: Joint Use	Public Anonymous	N/A	N/A	N/A	The Executive Agent should attempt to maximize the efficiency of this EIS while limiting the impact, this can be accomplished by linking it to other military NEPA actions in the Marina Islands. The EA should evaluate the alternatives of this EIS relative to potential future cantonment and training locations. One known example is	Based on comments received on the DEIS and coordination of federal and local stakeholders and the public, the USAF has developed modified alternatives. The USAF is providing an additional opportunity to comment on the revised proposed action	Postal Mail

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						the Marine Corps relocation to Guam and CNMI. The Marine Corps has expressed interest in training on Tinian so the build-up of the port and airfield facilities seems to make more sense to be focused on Tinian. This seems to be the greatest efficiency for the tax payer. At a minimum, this important fact needs to be considered in the analysis.	and alternatives by making a Revised Draft EIS available the public. The decisionmaker will weigh all available information to make the final decision, which will be identified in the ROD.	
U204	Proposed Action  Tinian v. Saipan: Joint Use  Tinian v. Saipan: Covenant	Political Stakeholder Gov. Fitial White Paper	N/A	N/A	N/A	The Commonwealth of the Northern Mariana Islands (CNMI) is supportive of the military and openly endorses a robust military presence in the Commonwealth. The CNMI is especially pleased that the United States Air Force (USAF) has evaluated and considered the islands of Rota, Saipan, and Tinian for the proposed Divert Activities and Exercises initiative. The CNMI looks forward to hosting the USAF Divert Activities proposed action within the Commonwealth. The CNMI understands the USAF environmental analysis and the sensitivity to the financial implications and rationale on selecting Saipan as the Preferred Alternative. The CNMI encourages the USAF to consider a more strategic and holistic approach, which leverages scarce Department of Defense resources on a joint service – joint international training complex on the island of Tinian. Enhancing Tinian West Field supports the USAF Divert Activities mission, while also enhancing Tinian’s training value. Recent training exercises, inclusive of Marine Air Group 12 (MAG12) exemplifies the interoperability of missions in the region and justifies the need for a comprehensive integrated training venue. Existing civilian infrastructure affords the potential of cost sharing, while the small civilian population does not generate significant compatability challenges. The choice of Tinian for the USAF Divert Activities is a step forward in fulfilling the intent of the long term lease between the Commonwealth and the United States. The island of Tinian was pivitol to ending World War II and Tinian looks forward to serving the Nation once again.	Comment noted.	Postal Mail
U205	Tinian v. Saipan: Covenant	Political Stakeholder Gov. Fitial White Paper	N/A	N/A	N/A	The Commonwealth of the Northern Marianas has been and will continue to provide support for all military initiatives as the Nation and Department of Defense pivot toward the Pacific. The islands of Saipan and Tinian played major roles during World War II and Tinian in specific had the world’s busiest airport during the war. The Covenant to Establish a Commonwealth of the	The EIS has been revised in Sections 1 and 2 to include a discussion of The Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America (Covenant) contained at 48 U.S.C. 1801 et seq. which recognizes the significance and scarcity of land.	Postal Mail

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						Northern Mariana Islands in Political Union with the United States of America defines the unique relationship between the Northern Mariana Islands and the United States, recognizing U.S. sovereignty but limiting, in some respects, applicability of federal law. On March 24, 1976, President Gerald Ford signed Public Law 94-241 (90 Stat. 263), enacting the Covenant. Some provisions became effective on that date, pursuant to Covenant Section 1003(a). Remaining provisions became effective on January 9, 1978, and November 4, 1986, the dates specified in Presidential proclamations issued pursuant to Covenant Section 1003(b)-(c). On the latter date, qualified residents of the Northern Mariana Islands became U.S. citizens.		
U206	General	Political Stakeholder Gov. Fitial White Paper	N/A	N/A	N/A	The CNMI is extremely supportive of the military and openly endorses a robust military presence throughout the Commonwealth. The Guam Buildup EIS from 2009 and Record of Decision in 2010 indicate that Tinian would host four live fire training ranges. Many joint training exercises have been conducted on Tinian over the past 30 years.	Comment noted	Postal Mail
U207	Proposed Action	Political Stakeholder Gov. Fitial White Paper	N/A	N/A	N/A	The Draft EIS has indicated that Saipan is the Preferred Alternative 1. CNMI officials understand that Saipan offers numerous advantages such a access to fuel vessels, better infrastructure, a control tower, and existing fuel storage capabilities. We also realize that any improvements made on Saipan will only enhance our islands and region for future military actions. If the USAF determines that Saipan is indeed so advantageous to this mission we will welcome the Air Force to the Commonwealth.	Comment noted.	Postal Mail
U208	Tinian v. Saipan: Noise Tinian v. Saipan General Cultural Resources	Political Stakeholder Gov. Fitial White Paper	N/A	N/A	N/A	We realize that this study looks only at impacts the activities will have on environmental issues and weighs them accordingly. Our major concerns to the Preferred Alternative 1 are the noise impacts to the villages of Koblerville, Dan Dan and San Antonio, the requirement for additional land leases on and around Commonwealth Ports Authority (CPA) property and the Cultural Resource adverse impacts on AsLito/Isley Field National Historic Landmark.	The noise analysis was revised in Section 4.1 and 4.10 based on input from the public, Headquarters Air Force, AFCEC, and FAA. A more thorough land use compatibility assessment was completed based on these revisions to the noise analysis. Additionally, he USAF has revised its proposal to eliminate jet fighter aircraft and reduce the number of KC-135 operations, thereby eliminating the high noise concern. The USAF is providing an additional opportunity to comment on the revised proposed action and alternatives by making a Revised Draft EIS available the public.	Postal Mail

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							With regards to cultural resources, PACAF has revised the scope of the Undertaking in coordination with CNMI officials. Now, PACAF seeks to complete the Section 106 process and parallel procedures under the National Environmental Policy Act (NEPA) for an Environmental Impact Statement (EIS). In this regard, Pacific Air Forces (PACAF) worked to redefine the Area of Potential Effect (APE) and to make a formal finding of effect for which concurrence was requested. The Section 106 process took place as laid out in 36 Code of Federal Regulations (CFR) 800. This information has been clarified in the Revised Draft EIS, specifically in Sections 3.8 and 4.8, and all documentation in support of the Section 106 consultation process is contained in Appendix D of the EIS.	
U209	Tinian v. Saipan: Joint Use	Political Stakeholder Gov. Fitial White Paper	N/A	N/A	N/A	The island of Tinian was pivotal to ending World War II. The residents on the island of Tinian are willing and ready to host the Department of Defense and serve the Nation. Current training exercises, such as Operation Geiger Fury, have been extremely successful and underscore why the U.S. Government and the Government of Japan are evaluating a joint training complex, within the Commonwealth. The addition of the Divert Activities and Exercises initiative on Tinian allows DoD to leverage its scarce resources on a joint-service and joint international training complex. Tinian is well postured, having the required land to carry out the Divert Activities and Exercise mission, within the existing military lease area.	Comment noted.	Postal Mail
U210	Tinian v. Saipan: Joint Use	Political Stakeholder Gov. Fitial White Paper	N/A	N/A	N/A	The initial Tinian investment would be slightly higher if it is viewed as a stand alone action. However, as an initial component to a long term strategic initiative the delta in initial costs are insignificant and are easily off-set by long term return on investment. Investing in Tinian is in concert with and reinforces DoD's pivot to the Pacific Region.	Comment noted.	Postal Mail
U211	General	Political	N/A	N/A	N/A	The CNMI extends our appreciation to the USAF for	Comment noted.	Postal Mail

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		Stakeholder Gov. Fitial White Paper				evaluating and considering Rota, Saipan and Tinian; for affording us the opportunity to express our thoughts on this critical action; and to hosting the Divert Activities and Exercises. We will continue to support and serve our Nation and the Department of Defense. The CNMI has a date with destiny and is ready to respond as the focus shifts to the Asia Pacific region.		

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