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COMMENTS ON JGPO EIS

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Guam and CNMI Military Relocation. The CNMI Government's Department of Lands & Natural Resources (DLNR) appreciates that JGPO incorporated many of DLNR's Division of Fish & Wildlife (DFW) comments on the early release draft into the DEIS.

Brown Tree Snake

The accidental release and establishment of Brown Tree Snakes (BTS) on Tinian from increased military traffic between Tinian and Guam has potential to cause eradication of all native terrestrial bird species on Tinian, along with extinction of the Tinian monarch. If BTS became established on Tinian, the potential for its spread to Saipan would also increase due to frequent traffic between Tinian and Saipan. The potential spread of BTS to Tinian should be considered a significant impact of the proposed action.

- • Volume 2, 2.3.4.2, Storage: The EIS states that no storage of equipment or ammunition would occur on ranges on Tinian. By bringing all equipment (including vehicles) to Tinian from Guam on every trip JGPO increases chance of BTS introduction to Tinian. DLNR strongly recommends that JGPO consider storing equipment on Tinian to reduce chance of BTS introduction to Tinian.
- • Volume 3, page 10-22 states that impacts from potential introduction of BTS to Tinian would be mitigated to less than significant. By stating this, JGPO is 100% confident that no BTS will ever be accidentally brought to Tinian and establish a population. Given that BTS from Guam have been found as far away as Oklahoma, and that traffic between Guam and Tinian will significantly increase under the proposed action, DLNR believes that impacts from potential introduction of BTS to Tinian should be considered significant.
- • Given that the Biosecurity Plan for Micronesia is not currently complete, and that mitigation measures present in the Biological Assessment submitted to U.S. Fish and Wildlife Service is not available for review, it is impossible for

D-001-001

Thank you for your comment. DoD complies with CNMI's current quarantine and interdiction procedures and will continue to do so during and after the military relocation.

JGPO recognizes the increased risks from the BTS with the additional training proposed. However, storing equipment will require additional facilities and construction on Tinian and may not be feasible without a continual presence on the island, which is not planned. The inspection procedures for BTS and other invasives are intended to prevent the introduction of any new species and this mitigation will reduce the potential significant impacts to less than significant. Some inspection and prevention procedures are already in place in the COMNAV Marianas Training Handbook (June 2000). As you note, the Biosecurity Plan which will provide additional procedures and preventive measures is currently not available. The proactive approach being used is interim measures to prevent the introduction and spread of BTS and other invasive species. These measures may include rapid response, education, inspection and search techniques, and the continued participation in the BTS Working Group.

D-001-001

DLNR to determine if mitigation measures are adequate to prevent any introduction and spread of BTS to CNMI. JGPO does not state if the Biosecurity Plan will be complete before any actions occur on the proposed action.

- • Volume 10, page 10-138: JGPO states that research will be funded to improve techniques for finding BTS. JGPO states this will occur "to ensure a snake can be found if a sighting occurs on Tinian." JGPO here admits that there is potential for accidental snake release from military activities on Tinian; however, in other places JGPO states that effects of potential BTS introduction would be mitigated to less than significant. If there is potential introduction of BTS to Tinian, the impacts cannot be considered less than significant.
- • Volume 10, page 10-138: JGPO states that military buildup in Guam and CNMI would "*significantly* increase the risk of marine and terrestrial species arriving in Guam and CNMI as well as being transported throughout the region." Once again, the potential effects of potential introduction of BTS to CNMI should be considered significant.
- • Because of the potential, however minimized, of BTS introduction to Tinian, there are potentially significant impacts to both special-status species and to wildlife in general from the proposed action.
- • Volume 10, page 10-137: JGPO states that requirements that individual troops inspect their gear and clothing to look for possible inconspicuous stow-away BTS will minimize potential effects of troop transport between Guam and Tinian. Because of severe effects of potential BTS introduction, all potential effects must be eliminated, not minimized. Troops inspecting their gear is a necessary requirement; however, due to human error there must be multiple pathways to ensure there are no stow-away BTS in troop gear.
- • Volume 10, page 10-137: JGPO states that Navy would notify port or airport authorities if DOD-related equipment left Guam without property inspection for BTS. Navy does not specify what the port or airport authority

would do on Tinian if this were to occur. DLNR expects that all equipment would be returned to Guam before arrival at its destination if proper inspections had not occurred.

- • Volume 10, page 10-137: Please change the text of the 5th bullet on page 10-137 to Navy “will” support from “could” support. DLNR strongly supports measures described under this bullet including rapid response actions to BTS sightings in the CNMI and temporary snake-free quarantine areas for cargo traveling between Guam and CNMI.
- • Increase in traffic between Guam and CNMI puts additional pressure on CNMI resources dedicated to preventing the introduction and establishment of BTS. DFW expects that JGPO will provide funding and additional resources to DLNR’s BTS Program to deal with potential of BTS to spread from Tinian to Saipan and other CNMI islands. DLNR BTS program is often challenged by lack of resources including fuel, funding, and ability to travel quickly between islands. JGPO needs to guarantee assistance to local BTS programs as part of Biosecurity Plan and mitigation of JGPO.

General Comments

- • In addition to BTS, there are other invasive species that have potential to spread from Guam to CNMI. Other invasive species found on Guam but not in CNMI include the Asian cycad snail and coqui frog, among other invasive flora and fauna, wildlife and plant diseases, insects and pests. Clearing of land for range construction increases possibility that invasive vegetation will spread from edges of construction site into wildlife habitats. Invasive vines can quickly smother a forest and destroy wildlife habitats. Increased traffic between Guam and CNMI has potential to spread these pests to Tinian, and potentially then to Saipan, and these threats need to be addressed in the JGPO EIS and in the Micronesian Biosecurity Plan.

D-001-002

- • An increase in human activity at range sites, including food and wastes, has potential to attract cats, rodents and unwanted species to the site. DLNR recommends that cat and rodent trapping occur on the ranges to remove any unwanted species that may thrive in areas where human wastes and trash are present. More details must be provided on the compost systems and what measures will be taken to ensure that wastes do not lead to increase in cats and rodents to nearby forests.

D-001-003

- • In Volume 3, page 4-22 the text states there would be no reduction in amount of wetlands on Tinian. However, Table 4.2-1 states that there will be direct fill of 0.3 acres of wetland under Alternative 1.
- • In Volume 3, Section 4.2.7, Summary of Potential Mitigation Measures for Wetlands: DLNR recommends restoring/improving habitat at Hagoi wetland. Mitigation could also involve reducing predation from rodents and monitor lizards at Hagoi.

D-001-004

- • JGPO has selected as its preferred alternative the alternative with the greatest impacts to wetlands and terrestrial wildlife (Volume 3, pages 4-32 and 4-33). DLNR prefers that JGPO selects an Alternative with fewer impacts to wetlands and terrestrial wildlife. If JGPO does select Alternative 1, long-term mitigation measures should be implemented to restore, monitor, and protect natural resources affected by the preferred Alternative.
- • DLNR prefers that JGPO abides by the agreement it made during the formation of the FAA Mitigation Area, and not clear portions of the FAA Mitigation Area for new ranges. As part of the Preferred Alternative the Automatic Field Firing Range will be built in close proximity to a native forest that has been monitored by the USFWS for the past 4 years as part of the Tinian Monarch Post-Delisting Monitoring Plan. Research in this area has shown that Tinian monarchs are breeding successfully, and that this area has high quality habitat for monarchs. Placing the Automatic Field Firing Range near this patch of forest has potential to degrade the habitat through habitat

D-001-002

Thank you for your comment. Range sites would be provided with restroom facilities either plumbed to the sewer or portable toilets regularly serviced, so human wastes would not be an issue. Also these sites would be provided with solid waste containers for collection of trash, which would be hauled out after the 2 week training period ended. These containers would be animal proof with tight fitting lids. A problem with rodents would not be expected, but if it does occur your suggestion would be considered.

D-001-003

Thank you for your comment. This noted discrepancy has been resolved in the Final EIS. Potential mitigation measures are noted and are included in the Final EIS. See Volume 7 for a complete list of all mitigation measures.

D-001-004

Thank you for your comment. The preferred alternative was selected based on many factors in addition to impacts on natural resources. If jurisdictional wetlands are present in the footprint of the ranges DoD will attempt to adjust the footprint to avoid impacts to the wetland. Mitigation measures have been proposed in the EIS to compensate for the removal of the established FAA Mitigation Area. In addition, DoD is working with USFWS during the ESA Section 7 consultation to reduce impacts to the Tinian monarch and the efforts to monitor the Tinian monarch.

D-001-004

fragmentation, edge effects, noise disturbance, and spread of non-native vegetation.

D-001-005

- • The Terrestrial Biological Resources impact analyses do not include any mention of effects from habitat fragmentation. There will be four new facilities constructed on Tinian, along with associated access roads and parking areas. Under the proposed action a total of 70 hectares of Tinian monarch habitat would be cleared. Since these areas are not contiguous and some relatively small, the effects of habitat fragmentation and associated edge effects should be addressed in the EIS. Habitat fragmentation will reduce the ability of remaining forests to support Tinian monarch, and other forest bird territories as well as increasing "edges" which lead to increased encroachment of invasive species and introduced predators.

D-001-006

- • Volume 3, page 8-5: Three future homestead areas have been identified on Tinian. In addition to village homesteads northwest of San Jose, there is one village homestead designated north of San Jose and east of Broadway, and another designated in Marpo Valley. Lots have been given away to residents in the three homestead villages.
- • Volume 3, page 10-12: Another indirect impact is potential land-use changes in the southern 1/3 of Tinian due to agricultural leases being terminated in LBA. If grazing and farming lots are lost in LBA, land-use may be transferred to southern Tinian. This could potentially cause a further loss of wildlife habitat on Tinian and lead to more concentrated development in the south third of the island. All this could lead to population declines of native wildlife species, including the formerly listed Tinian monarch.

D-001-007

- • Volume 3, page 10-17: Mahalang wetlands are shown in Figure 10.2-2 but never mentioned or shown on maps in Wetland Section of the EIS.

D-001-008

- • Volume 3, page 10-19: In summer of 2009 a Tinian DLNR employee observed a Micronesian megapode along road between the Seabees Monument and Broadway near FAA Mitigation Area. Observer has experience conducting bird surveys on Aguiguan, where megapodes are

D-001-005

Thank you for your comment. The habitat fragmentation and edge effects and impacts such as you describe have been added to the EIS.

D-001-006

Thank you for your comment. The homestead discussion in the Final EIS, Volume 3, Section 8.1.2 has been updated.

The Navy has re-evaluated the need to terminate all subleases in the leaseback area and will only propose to terminate subleases in the leaseback area that are within the range footprint and associated Surface Danger Zone of the proposed firing ranges.

As to possible sites for the relocation of any leases, such actions would be under the control of CNMI officials as they are responsible for non-federal land use decisions on Tinian. DoD will work with CNMI land use and natural resource officials to ensure that native forest habitat concerns for ESA listed species are taken into account in any relocation effort.

D-001-007

Thank you for your comment. The Final EIS consistently describes wetland areas across chapters and volumes.

D-001-008

Thank you for your comment. This megapode sighting has been noted in the EIS and your comment referenced as the source.

D-001-008

common, and is familiar with call and appearance of megapodes. While sighting is unconfirmed, it is very likely that a Micronesian megapode was observed near the FAA Mitigation Area and proposed ranges.

D-001-009

- • Volume 3, page 10-22: Fire has potential to clear wildlife habitats and potentially give invasive vegetation a foothold in an area. DFW recommends that Fire Management Plan assures that any burned area is revegetated with native species and monitored closely to prevent spread of noxious weeds.

D-001-010

- • Volume 3, page 10-24: EIS states that surveys be conducted for ESA-listed species before construction work begins. Tinian monarch is a formerly CNMI designated listed species. Under CNMI regulations "A species or subspecies listed as threatened or endangered may not be harvested, captured, harassed or propagated... (Volume 22, Number 04, April 20, 2000, Section 10.2). Clearing Tinian monarch habitats during monarch's breeding season would potentially destroy monarch nests and kill any chicks in nest. This would be a violation of local regulations protecting threatened and endangered species should Tinian monarch be re-listed. Tinian monarch nests should be searched for and avoided until the nests fledge or fails naturally. Clearing for construction work should occur during non-breeding season for Tinian monarch.

- • Volume 3, Table 10.2.7: One potential mitigation measure is to monitor birds using the "Tropical Monitoring of Avian Productivity and Survival" (TMAPS) methodology. The DFW strongly encourages that this mitigation measure be implemented. TMAPS should occur for 5 years throughout the island of Tinian, and not just in the LBA and EMU.

- • Volume 7, Table 2.2-1, line TB-16, Develop Tinian monarch management plan: A Tinian monarch management plan should include annual surveys in LBA and EMU to determine long-term trends of how Tinian monarch is faring with increased military use.

D-001-011

- • Volume 7, page 1-15: It is confusing if typhoon discussion is addressing Rota or Tinian, and why Rota is included when no action will occur there.

D-001-009

Thank you for your comment. The fire management plan will include recommendations for replanting after fires and the preparer will solicit recommendations by experts or those who have experience with revegetation in Guam and/or CNMI.

D-001-010

Thank you for your comment. According to the U.S. Fish and Wildlife Service, Tinian monarch breeding can occur year-round and may be somewhat dependent on rainfall. Consequently, it is impractical from a planning standpoint to prohibit construction during a pre-defined time. TMAPS or similar bird monitoring has been included in the FEIS. Conducting these surveys outside of DoD lands will be discussed with the CNMI Division of Fish and Wildlife.

Long-term monitoring of the Tinian monarch is being conducted by the USFWS.

D-001-011

Thank you for your comment. The sentences on Rota are deleted in the Final EIS from Volume 7 Chapter 1.

Cumulative Impacts Assessment

D-001-012

- Cumulative impacts analyses for Tinian is insufficient. The analyses should include effects of cumulative habitat changes over time. Given Tinian's history, the analyses should go back to pre-WWII era when extensive habitat changes occurred due to cultivation of sugarcane during Japanese era. There is a description of these changes in the introduction (Volume 7, starting on page 1-14), but there is no analysis of how the impacts of build-up on Tinian will cumulatively affect natural resources.
- Volume 7, page 4-25: Cumulative impact analyses need to examine past and future actions, and look at the big picture of natural resources on Tinian. Table 4.3-4 says there is strong additive impact of the proposed action to terrestrial biology. However, there is no discussion of how this conclusion was reached and of what effects the additive impacts would be.
- Volume 7, Table 4.3-4: This table does not include the three proposed homestead developments (approximately 45 ha to be cleared) or the proposed Resources Management International Corporation quarry currently in the permitting stage (5 ha development).

Fisheries Comments

D-001-013

- There were minimal issues pertaining to marine related activities and impacts to marine resources. Chapter 11, Page 11-1, Section 11.1, first paragraph of Draft EIS states that "no Marine Corps relocation and/or training activities are planned for the marine environment on Tinian (i.e. no in-water construction, dredging, or training activities and or land-based construction activities are being proposed that would affect marine environment)." What about training not associated with Marine Corps? Naval or Army exercises are not included in this EIS, which may have other exercises planned for Tinian. However, it is clearly stated in draft EIS that no marine activities are planned for Tinian.
- On page 11-2, section 11.1.1.3, third paragraph states that, "no species of concern exists or are expected to be present within the Tinian ROI. ROI (region of influence) is defined as nearshore waters out to 164 feet isobaths. The Humphead wrasse (*Chelinus undulatus*) and Bumphead parrotfish (*Bolbometopon muricatum*) are listed as species of special concern and inhabit these ROI areas. Although minimal literature is available pertaining to these two species presence in waters

D-001-012

Thank you for your comment. Addressing the first bullet: Due to the complexity of the project, there are two parts of the cumulative impact analysis: the summary of impacts for all components of the proposed action (Volume 7 Chapter 3) and an assessment of the additive impacts of the proposed action in combination with other past, present and reasonably foreseeable projects (Volume 7, Chapter 4). A systematic methodology was applied in both analyses.

Volume 7, Chapter 3 summarizes the combined potential impacts of the preferred alternatives for the entire proposed action on Guam and Tinian. This is the aggregate analysis that you request in your comment. The impacts of Volumes 2 through 6 are discussed by resource. At the end of Volume 7, Chapter 3.3 there is a table summarizing the combined impacts of all components of the preferred alternatives. Significant impacts are identified. Trends in the resource health due to anthropogenic and non-anthropogenic factors that impact resource health on Guam and Tinian since World War II are described. This section includes limited quantitative data for proposed action impacts. For example, special-status species habitat loss due to the proposed action and current amount of habitat available island wide is presented in Volume 7, Section 3.3. There is no quantitative island-wide data readily available for most of the resource areas assessed and the impact analysis is often qualitative.


Volume 7, Chapter 4, Cumulative Impacts, assesses the potential additive impact of the EIS proposed actions when compared to potential impacts of past, present and reasonably foreseeable projects. The period of consideration for the cumulative impact analysis is 2004 to 2019. The project list is based on best available information from DoD and the Guam Land Use Commission database. There is no National Environmental Policy Act (or similar) document disclosing project impacts for most of the cumulative projects listed; therefore, there is

D-001-013

around Tinian, it would be proactive to state they are present within the ROI. There has been anecdotal information on Humphead wrasse being caught in waters surrounding Tinian.

- On page 11-11, section 11.1-3, third paragraph indicates that DLNR, through its DFW, is in charge of managing MPA's. No mention of other authorities or responsibilities of DLNR was made. It would be prudent to include statements such as "DLNR, through its DFW, is authorized to manage, protect and conserve fish, game and endangered and other protected species." The statement in the draft EIS gives the impression that DLNR's DFW is only tasked with managing resources within MPA's.

Sincerely,


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DLNR Secretary

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Lt. Governor Eloy S. Inos
DFW Director Sylvan O. Igisomar

insufficient data on most cumulative projects listed to conduct a quantitative impact analysis. There is a table at the end of Chapter 4 that summarizes the potential cumulative impacts. Potential significant cumulative impacts are identified for some resources. Mitigation measures are proposed earlier in the EIS.

D-001-013

Thank you for your comment. Cumulative impacts, which include actions by other agencies, federal and private, are described for Tinian in Volume 7, Chapter 4, Section 4.3.4.2. The statement in this section of the EIS is referring only to the proposed action.

FEIS text has been modified to include the anecdotal information as suggested and for clarification of DLWR tasks on Tinian.