



Friends of the
Mariana Trench MNM

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July 6, 2020

VIA EMAIL : info@mitt-eis.com

Naval Facilities Engineering Command Pacific
Attention: MITT Supplemental EIS/OEIS Project Manager
258 Makalapa Drive, Suite 100
Pearl Harbor, HI 96860-3134

Reference: 5090, Ser N465/0622, June 5, 2020
Mariana Islands Training and Testing Final Supplemental EIS/OEIS
Public Comments

Dear Project Manager:

We have reviewed the Final MITT Supplemental EIS/OEIS and response to our comments. Our comments have not been fully addressed and our major concerns have not been resolved. Specifically,

- 1) Training and testing activities proposed will temporarily limit access to areas of the ocean, which has the potential to impact traditional fishing practices, and tourism in the Study Area, and alternatives that would not impact traditional fishing, recreation and access to the ocean were not developed nor analysed.
- 2) Least environmentally damaging methods were not adopted such as a) limiting activities to outside marine protected areas, including the Mariana Trench Marine National Monument and the National Wildlife Refuges in the Study Area, or b) only using a minimal number of rounds during exercises.
- 3) More effort should be made to provide for native language speakers to engage the residents of the Mariana Islands in the activities and findings. If there is a true interest in engaging the public, then conducting meetings in a locally, culturally appropriate way should be the number one priority. Not only should updates on local training activities be provided routinely to the general public on Guam and CNMI, but also updates on mitigation efforts and research findings should be presented in a culturally appropriate way so that the residents are fully aware of when activities are occurring and the outcomes of the activities and associated research findings. The Species Monitoring Program website (<https://www.navy-marinespeciesmonitoring.us/>) is helpful but several of the functions are still underdevelopment for the Western Pacific.
- 4) It is stated that information on natural resource management and stewardship projects, such as sea turtle monitoring and bird recovery programs, is discussed in the Joint Region Marianas INRMP, but we could not locate an available copy of the INRMP. Can one be provided? Also, we understand that the INRMP is a planning document and does not commit the JOIN Region Marianas to completing any of the management actions. It would be more helpful to know which projects are funded. The Joint

Region Marianas should be building community relationships by providing outreach activities and community engagement on a regular basis and partnering with local non-governmental organizations and the schools to provide conservation program and STEM- related resources and programs for the schools. Even if the Joint Region Marianas considers these types of engagements outside the scope of the Action, it would help alleviate confusion within the community, build more solid relationships with the community and relieve some of the antagonism that federal agencies face in Mariana Islands. For example, the Navy should also mitigate impacts of increased marine debris, noise, decreased air and water quality by implementing tangible improvements throughout Guam and CNMI ocean and coastal zones. Sponsoring assessments, clean-ups and restoration of areas impacted either directly or indirectly by the activities proposed in MITT should be developed and are lacking. You should consider of out of kind mitigation such as restoring areas affected by coral bleaching, providing signage for sensitive resource areas, or assistance in providing education, or trainings for all stakeholders on resource management.

- 5) Continued encroachment by DOD on human life of the Mariana Islands poses a dire threat to the health of the indigenous peoples of the Marianas in various ways, including increased incidences of diseases and toxic exposure caused by contamination of local food and water sources by ordnance as well as civilian injuries and deaths resulting from errors that occur during military training exercises (both of which occurred during military training range exercises on the Puerto Rican island of Vieques).
- 6) The destruction of the natural and human environments of the Marianas poses a dire threat to the archipelago's local tourism-based economy by straining local infrastructure and degrading an essential element attracting tourists to our islands — the natural beauty of the Marianas — along with the health and capacity of the local workforce, and the degradation of the natural environment, human health and local economy of the Marianas threatens to trigger a mass emigration from the Marianas Archipelago to the continental US, spreading two relatively small indigenous groups of people across a vast tract of land in which their ethnicity is widely unrecognized and, thus, diluting and straining Mariana Islanders' capacity to participate in cultural practices, in turn, eroding any shared sense of cultural identity and threatening to extinguish local indigenous culture outright.
- 7) The FOMT supports the comments made by Our Commonwealth 670 that were submitted on July 3, 2020.

The project should not move forward, and the no action alternative should have been selected until more reasonable, less environmentally damaging alternatives could be developed. As you intend to move forward, please consider investing resources into providing culturally appropriate outreach and community partnerships in education and conservation so that the residents have a regular opportunity to engage with the Navy and the Joint Region Marianas perhaps through the CNMI's Office of Economic Adjustment, and are able to derive at least some sort of offset for the environmental damages that have and will continue to occur.

NAVAL FACILITIES ENGINEERING COMMAND PACIFIC

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Thank you for your time and consideration. You may contact me at (670) 989-1452 or via email at marianamonument@gmail.com.

Respectfully submitted,


Ignacio "Ike" V. Cabrera
Secretary, FOMTM

xc: FOMTM Board Members
The Honorable Ralph DLG. Torres, Governor CNMI
Congressman Sablan, CNMI