



Friends of the
Mariana Trench MNM

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Naval Facilities Engineering Command Pacific
258 Makalapa Drive, Suite 100
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Attention: MITT Supplemental EIS/OEIS Project Manager

RE: Mariana Islands Training and Testing Supplemental Environmental Impact
Statement/Overseas Environmental Impact Statement (EIS/OEIS)

Dear Project Manager:

The Navy recently released a draft Supplemental Environmental Impact Statement (SEIS) for the MITT for public comment. Per the MITT website, the SEIS “specifically addresses the at-sea and FDM portion of the Study Area and includes a reassessment based on updated training and testing requirements; incorporates new information from an updated acoustic effects model; updates marine mammal density data; and incorporates evolving and emergent best available science.” (Supplemental Draft MITT EIS Vol. 1, pg. ES-1

We have reviewed the MITT Supplemental EIS/OEIS and our over-arching concerns are:

- Training and testing activities proposed have the potential to temporarily limit access to areas of the ocean, which has the potential to impact traditional fishing practices, and tourism in the Study Area” *Supplemental MITT, pg. 3.12-16*. Alternatives that do not impact traditional fishing, recreation and access to the ocean should be developed and analyzed including other locations.
- According to the Navy’s MITT Fact Sheet, the active sonar testing proposed in the ocean around the Marianas will no real effect on marine mammal; however, this contradicts studies conducted by both marine scientists and the Navy itself. In a previous environmental impact statement or EIS draft, the Navy admitted that the sonar exercises planned for 2014-2018 may unintentionally “harm marine mammals 2.8 million times over five years.” Included in this estimate are two million incidents of “temporary hearing loss,” and two thousand incidents of permanent hearing loss.” The discrepancy should be explained, and even if modeling indicates that marine mammals may be less impacted than previously estimated, methods that reduce and avoid incidents of marine mammal



harm should be implemented, reducing number of sonar exercises, avoiding areas with marine mammal activity, stopping activity if a marine mammal approaches the area, etc...

- The expansions proposed in the Supplemental Impact Statement for the MITT would increase the annual rate of naval surface fire explosive rounds fired on FDM from 1,000 to 2,800 (alternative 1) or 4,200 (alternative 2). Medium-caliber gunnery increases by 700 to 94,650 rounds plus 17,500 explosive rounds. The current rate of 2,000 explosive rockets is maintained, while explosive missiles increase from 85 to 115. Explosive grenade/mortar attacks increase from 600 to 2,000 per year and small-caliber rounds from 18,000 to 30,000.” The training can be completed with a lower number of rounds, so the least environmentally damaging methods should be used by eliminating live rounds, or only using a minimal number of rounds.
- The Supplemental EIS for the MITT does not include the full disclosure of the cumulative impacts associated with the massive live-fire range in and around the Marianas, of which the MITT is just one component. Pitt et al (2019) reported that pathways for invasive species opened by the massive live-fire range and the Marines Relocation to Guam activities are highly likely to bring numerous invasive species to the region and beyond, to Hawai'i and the U.S. mainland. These include five species of snakes including the Taiwan Pit Viper (from Taiwan and Okinawa) and the Banded Krait (from India and Southeast Asia), both of which are venomous and can be deadly to humans.

Pitt, William & Stahl, Randal & Yoder, Christi. (2010). Emerging Challenges of Managing Island Invasive Species: Potential Invasive Species Unintentionally Spread from Military Restructuring. Proceedings of the Vertebrate Pest Conference. 24. 10.5070/V424110495.

Below we provided details for our specific comments by section and page number:

Volume 1, **ES.2 Purpose of and Need for Proposed Training and Testing Activities**, page ES-1: It should be stated that NMFS also has the authority to evaluate the proposed action under ESA and EFH regulations, not just MMPA.

Volume 1, **ES.4.1 Draft Supplemental Environmental Impact Statement/Overseas Environmental Impact Statement**, page ES-2: This sentence “The Draft SEIS/OEIS is available for review and comment, and two public meetings are scheduled (February 26, 2019 in Guam and February 27, 2019 in Saipan, Commonwealth of the Northern Mariana Islands [CNMI]).” needs to be updated with the actual dates of the “open houses”. Also, more effort should have been



made to provide for native language speakers to answer questions. If there is a true interest in engaging the public, then conducting meetings in a locally, culturally appropriate way should have been the number one priority. Additional meetings on Rota and Tinian should have also been scheduled.

Volume 1. **Table ES.6-1: Summary of Environmental Impacts for the No Action Alternative, Alternative 1, and Alternative 2 (continued), page ES-14:** please provide a copy of the survey data collected during Periodic helicopter-based surveys of FDM have occurred since 1998 (monthly up to 2009, and quarterly thereafter through September 2016) for marine birds nesting on the island.

Volume 1 **ES.6.1 Cumulative Impacts, page ES-22:** Reword this sentence “Under Alternative 1 and Alternative 2, danger zones could potentially restrict access to fishing and recreational areas when ranges are in use,” to read “Under Alternative 1 and Alternative 2, danger zones will restrict access to fishing and recreational areas when ranges are in use.” (striking the word *potentially*)

Volume 1 **ES.7.2 Mitigation, page ES-23.** This section should be rewritten to include a summary all mitigation measures that were agreed during the original FEIS process and should also include a summary of all mitigation measures that have been implemented to date, as well as, conservation actions currently being proposed to offset additional impacts of the Proposed Action.

Volume 1 **ES.7.5 Reporting, page ES-24:** Please include a website where monitoring reports and reports that document environmental impacts /reductions of impacts will be posted for public access.

Volume 1 **ES.7.6.3 Irreversible or Irretrievable Commitment of Resources, page ES-25:** The following sentences should be rewritten: “Since there would be no building or facility construction, the consumption of materials typically associated with such construction (e.g., concrete, metal, sand, fuel) would not occur” , and “Since fixed- and rotary-wing flight and ship activities could increase, relative total fuel use could increase,” to read “There would be no building or facility construction, therefore; the consumption of materials typically associated with such construction (e.g., concrete, metal, sand, fuel) would not occur”, and “Relative total fuel use could increase because fixed- and rotary-wing flight and ship activities could increase”.

Volume 1, **2 Description of Proposed Action and Alternatives, 2.1.1.2 Sea and Undersea Space, page 2-3:** Even though restrictions in the Marianas Trench Marine National Monument do not apply to military exercises, the Navy still is required to determine the least environmentally



damaging alternative, therefore: an alternative that includes avoiding activities that could result in direct damage, or debris accumulation in the boundary of the Marianas Trench Marine National Monument should be developed and analyzed.

Volume 2, **Table 4.2-1: Past, Present, and Reasonably Foreseeable Actions (continued), page 4-16:** For the Academic Research section, no mention is made of foreign vessels and organizations conducting research within the study area that is coordinated through the U.S. State Department and applicable federal agencies. Please include this information in the discussion.

Volume 2, **5.1.2.2.3. Incident Reports**, page 5-7: the incident reports that have been submitted to date (since the 2015 FEIS was published) should be made available to the public and data should be analyzed and presented in this section so that an assessment of this measure's effectiveness can be made.

Volume 2, **5.2.1.2 Mitigation Zones**, page 5-11: A discussion of how often and type of measure that have been implemented in mitigation zones to date should be included, so that an assessment of this measure's effectiveness can be made.

Volume 2, **Chapter 5- Mitigation**, pages 5-1 through 5-76. Mitigation should also include offsets for impacts that are expected to occur. 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. If conservation or offset measures have been implemented through the ESA consultation process, then these measures need to be included in the discussion as to their status and level of success to date. Consideration 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. Regular public meetings to report out status of the proposed activities, incidents that affected public safety or environmental quality, and injury to fish, wildlife, and sensitive resource should be implemented.

Volume 2, **6.1.2 Marine Protected Areas**, page 6-6: Activities within Marine Protected Areas should be avoided, and a discussion of resources protected within these areas should be included. Training for personnel involved in the proposed activities should include familiarization of rules and regulations associated with special designated area.



In summary, the destruction of the natural habitat and non-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);

Also, 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; therefore, the project should not move forward and the no action alternative selected until more reasonable, less environmentally damaging alternatives can be developed.

Thank you for the opportunity to comment. Please add us to the Supplemental EIS/OEIS mailing list to receive notifications of meetings, project information, availability of reports, or any associated future federal register notices.

If you need additional information from us, please contact us at marianamonument@gmail.com.

Respectfully submitted,

Ignacio Cabrera, Chairman

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