

**APPENDIX B**  
**2015 DRAFT EIS/OEIS COMMENT SUMMARY**

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## APPENDIX B

### **2015 Commonwealth of the Northern Mariana Islands Joint Military Training Draft Environmental Impact Statement/Overseas Environmental Impact Statement Comment Summary**

On March 14, 2013, the Department of the Navy (DON) published a Notice of Intent to prepare an Environmental Impact Statement (EIS)/Overseas Environmental Impact Statement (OEIS) for the construction and operation of training ranges on Tinian and Pagan in the Federal Register (FR) (78 FR 16257). The Notice of Intent announced a 45-day public scoping period; the dates, times, and locations for public scoping meetings; and the various methods available for submitting comments on the Proposed Action. In addition, the Notice of Intent stated the public scoping process would be used to satisfy National Historic Preservation Act (NHPA) Section 106 public engagement requirements in accordance with 36 C.F.R. section 800.8(c). The public scoping period was extended an additional 14 days on April 23, 2013 (78 FR 23920) and ended on May 12, 2013. Three public scoping meetings were held in the Commonwealth of the Northern Mariana Islands (CNMI) on April 10–12, 2013.

Collectively, the scoping comment submittals from government agencies, elected officials, business and commercial entities, interest groups, and individual citizens included 1,363 comments on 24 different topics. The six topics that received the most comments were the proposed use of Tinian and Pagan for military training, socioeconomics, land use, indirect/cumulative impacts, environmental justice, and biological effects. Commenters also questioned the need for live-fire training given the availability of computer simulation and existing training ranges on Farallon de Medinilla, Guam, and Hawaii.

On April 6, 2015, the DON published a Notice of Availability for the Draft EIS/OEIS in the Federal Register (80 FR 18385). The Notice of Availability announced a 60-day public review and comment period and identified locations where the Draft EIS/OEIS could be reviewed; the dates, times, and locations for public meetings; and indicated the National Environmental Policy Act (NEPA) process, including the Draft EIS/OEIS public meetings, would also satisfy NHPA Section 106 requirements. Advertisements containing similar information concerning the availability of the Draft EIS/OEIS were also placed in local newspapers. With three announced extensions, the public comment period lasted approximately six months, from April 6 through October 1, 2015. Three public meetings were held, two on Saipan and one on Tinian.

During the Draft EIS/OEIS public comment period, 28,527 comments were received. Commenters included the CNMI and federal government agencies, elected officials, business and commercial entities, interest groups, and individual citizens. Of the total number of comments received, 2,748 comments were unique, with the remaining comments consisting of petition signatures and form letters. The Proposed Action analyzed in the 2015 Draft EIS/OEIS included 14 live-fire ranges, an airfield, amphibious landings, permanent housing, and a High Hazard Impact Area on Tinian, as well as combined arms training with aerial and ship bombardment with a High Hazard Impact Area on the island of Pagan. The comments received on the 2015 Draft EIS/OEIS were critical of the Proposed Action.

After the Draft EIS release in 2015, CNMI Governors Inos and Torres requested a Section 902 consultation with the United States (U.S.) Government, with the CNMI Joint Military Training (CJMT) EIS being one of the topics of concern. The *Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America* (The Covenant) (Public Law 94-241) governs relations between the U.S. and the CNMI. Section 902 of the Covenant indicates that the Governments of the U.S. and the CNMI “will designate special representatives to meet and consider in good faith such issues affecting the relationship between the Northern Mariana Islands and the United States as may be designated by either Government and to make a report and recommendations with respect thereto.” These discussions are known as 902 Consultations. The latest 902 Consultation Report was produced in 2017 (U.S. 2017) and contains the following commitments:

- Both within and apart from the NEPA process, Department of Defense (DoD) will redouble its efforts to be transparent and consult with the CNMI political leadership on all issues of concern. DoD will strive to meet that commitment with engagements through the NEPA process and through separate engagements outside the NEPA process by Joint Region Marianas and U.S. Pacific Command. In addition, DoD will work with the CNMI to establish a consultative structure shortly after conclusion of the 902 Consultations. This consultative structure would be apart from the Section 902 process and provide another avenue and regular forum to address issues of mutual interest or concern.
- DoD agrees to share the new CJMT alternatives with CNMI leaders prior to publishing the Revised Draft EIS; these revised alternatives will seek to respond to public (including the CNMI) concerns while meeting DoD's joint training requirements.

The CNMI Government agreed to continue discussions on the proposed CJMT action in 2019. Engagements included a Live-fire Demonstration in Hawaii (October 2019), a site visit to Tinian (November 2019), and a discussion of “Current Thinking” (January 2020). However, the COVID-19 pandemic interrupted subsequent discussions, as a result of required government responses and health management actions. In December 2020, U.S. Indo-Pacific Command and CNMI agreed to resume discussion in January 2021 with a “Reconnect” meeting with staff officers.

At the CNMI’s request, from June to December 2016, the U.S. and CNMI governments held a series of virtual and in-person discussions pursuant to Section 902 of the 1976 Covenant (Section 902 Consultations). These discussions included, among other issues, concerns with the USMC expansive training proposal. Later, at the request of the CNMI governor, the USMC paused activity on CJMT to allow the CNMI to focus resources on the U.S. Air Force Divert proposal. During the global COVID-19 pandemic, the parties held small-group virtual meetings. The USMC re-engaged with the CNMI government on CJMT with an in-person meeting in January 2020, virtual meetings in January 2021 and June 2021, and in-person meetings in July 2021, March 2022, August 2022, March 2023, June 2023, September 2023, and December 2023 to discuss changes to the Proposed Action and the Revised Draft EIS. The USMC also held public information sharing meetings in August 2023 to share the revised training proposal with the public.

In response to the comments and input from the public, Table B-1 summarizes the 2015 comments and provides responses for how USMC made changes to the Proposed Action and environmental analysis.

**Table B-1 Summary of Representative Comments Submitted on the 2015 Draft EIS/OEIS**

<i>Issue</i>	<i>Comment Summary</i>	<i>How Comments Were Addressed</i>
Proposed Action and Alternatives	Commenters requested that additional alternatives outside the CNMI be considered and expressed the opinion the alternatives evaluated were too similar.	<p>USMC re-evaluated the alternatives including considering locations outside of CNMI. However, alternative locations do not meet the purpose and need. USMC made significant changes to the Proposed Action including:</p> <ul style="list-style-type: none"> <li>• Removal of all training on Pagan.</li> <li>• Live-fire ranges reduced from 14 to 2 (multi-purpose maneuver and explosives training).</li> <li>• All fixed-wing aviation delivered ordnance on Tinian was removed and replaced by simulated close air support for fixed-wing aviation only (i.e., aviators talking with ground units).</li> <li>• Ordnance from helicopters was removed.</li> <li>• Field Carrier Landing Practice was removed to reduce impacts to airport infrastructure, aviation traffic, and aircraft-generated noise on Tinian.</li> <li>• Proposed expeditionary aviation training would be focused around the North Field “Baker runway.”</li> <li>• A forward arming and refueling point that would include expeditionary airfield development, sustainment, and airfield defense would be sited at Baker runway in accordance with National Park Service directives and the requirements of NHPA Section 110.</li> <li>• Tanks and tank trails were removed.</li> <li>• Additional Tactical Amphibious Landing Training was removed.</li> <li>• No Military Training areas were designated around wetlands and natural resources.</li> <li>• U.S. Agency for Global Media Communications (formerly International Broadcast Bureau) would not be relocated.</li> </ul>
Geology and Soils	Commenters inquired about potential damage to coastal processes and beaches, potential impacts to prime farmland soils, and requested a description of how federal regulations would be applied to activities on Tinian and Pagan. Commenters also requested that baseline soil contamination data for sites on Pagan be collected for future comparison.	USMC re-evaluated the 2015 approach and eliminated additional in-water training and the beach ramp. USMC updated potential impacts to geology and soils, including farmland, related to the reduced Proposed Action footprint.
Water Resources	Commenters asked for additional details and data regarding potential impacts to groundwater, surface waters, wetlands and	USMC re-evaluated the Proposed Action to reduce impacts and site ranges away from sensitive resources. USMC eliminated

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	<p>watershed processes resulting from munitions constituents, potential contamination from spills of hazardous materials, impacts to limestone formation, increased potable water demand, etc. Other areas of concern included aquifer capacity, potable water sourcing options, and water rights. Additionally, commenters asked about the effectiveness of the Range Environmental Vulnerability Assessment (REVA) program and requested more baseline data generation and analysis for sites on Pagan and more detailed descriptions of Best Management Practices.</p>	<p>training on Pagan and reduced live-fire ranges from 14 to 2. Ranges were sited in the Exclusive Military Use Area (EMUA) and away from wetlands.</p> <p>The Final EIS provides a more detailed analysis and development of site-specific management practices for groundwater to ensure that groundwater is managed in accordance with CNMI regulations and coordinated with the Bureau of Environmental and Coastal Quality.</p> <p>In response to public concerns and to evaluate the behavior of munitions constituents in the Tinian environment, USMC utilized SEVIEW© software, which contains a combination of models (SESOIL and ATD123D) to simulate the fate of munitions constituents that are present in both soil and groundwater. The results of the modeling over a 100-year timeframe found that munitions constituents did not infiltrate to groundwater for each of the pathways modeled.</p>
<p>Air Quality</p>	<p>Commenters requested additional detail regarding significance determinations, compliance with national air quality standards, quantification of live-fire operations and airborne chemicals, monitoring plans, adaptive management, and climate change considerations.</p>	<p>USMC significantly reduced proposed operations and development in the revised action. The Final EIS re-evaluates the potential air quality impacts related to the reduced Proposed Action footprint and would include an assessment of mobile sources or permitted stationary sources.</p>
<p>Noise</p>	<p>Commenters were concerned with increased noise, significance thresholds, and potential impacts to daily life. They also asked whether Federal Aviation Administration’s Part 150 funds would be available to soundproof affected homes and public resources.</p>	<p>USMC significantly reduced proposed air operations in the revised action and sited live-fire ranges in the EMUA away from the public to reduce noise impacts. The Final EIS re-evaluates the potential noise impacts related to the reduced Proposed Action footprint and would include any new aircraft.</p>
<p>Land Use</p>	<p>Commenters requested greater consistency in land use designations, inquired regarding military acquisition of lands and access to military acquired lands, and expressed concerns about the availability and application of remediation funds after the lease period.</p>	<p>In response to these community concerns, the USMC revised their training approach, moving from an exclusionary approach where the training areas would be gated and fenced, to a shared use model that seeks to allow the greatest possible civilian access to the Military Lease Area. USMC does not plan to acquire additional lands. USMC also created eight subdivided training areas and would establish Range Control to coordinate training with public access. Range control maintains the training schedule and would work with the community on scheduling and access planning, specifically to avoid training on days that are important to the community, such as traditional fiestas. USMC is working to prioritize public access to cultural and recreational</p>

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		sites, and would limit access only when required for public health and safety or to comply with DoD safety requirements. Access to agricultural uses would be available 24/7. Live-fire ranges would be for military use only.
Recreation	Commenters requested additional information regarding access to recreational resources, compatibility of training with holidays and festivals, maintenance of recreational areas, and a system for monitoring and tracking visitor data. Commenters expressed concerns about the accuracy of baseline data relating to recreational sites and the potential degradation of offsite recreational areas and requested coordination between military and tour operators to maintain existing recreational resources in acknowledgement of increased demand.	The plan for eight subdivided training areas and Range Control to coordinate training with public access would be implemented as part of the revised Proposed Action. USMC would work to prioritize public access to recreational sites and would limit access only when required for public health and safety or to comply with DoD safety requirements.
Terrestrial Biology	Commenters expressed concerns about habitat loss, effects of munitions constituents on bird species, endangered species, invasive species, biosecurity, habitat protection, International Broadcast Bureau relocation, and unexploded ordnance (UXO) removal and questioned the adequacy of proposed avoidance and mitigation measures.	The new Proposed Action greatly reduces the area of habitat and terrestrial biological impacts. USMC proposes expeditionary airfield and a Base Camp with a greatly reduced footprint. The Final EIS includes an updated terrestrial biological survey and updated analysis of potential impacts from training and construction.
Marine Biology	Commenters expressed concerns about the effects of amphibious landings, invasive species, biosecurity, sedimentation effects, and munitions constituents. They also questioned the analysis of potential impacts to coral reefs, Special Status Species, marine mammals, sea turtles, intertidal habitat, and Essential Fish Habitat; measures to avoid or mitigate impacts; and analysis of data used for impact determinations.	In response to these community concerns, the USMC revised their training approach to eliminate additional in-water training and beach landings. Only those previously approved training events would take place. The revised Proposed Action is limited to land-based training and greatly reduces the footprint from the prior proposed training approach.
Cultural Resources	Commenters requested more information regarding the preservation of cultural resources, avoidance measures, and potential impacts to the National Historic Landmark at North Field. They also expressed concern about vibration effects to cultural sites, mitigation of construction impacts, and consistency with existing programmatic agreements.	In response to these community concerns, the USMC revised their training approach, moving from a heavily developed approach to an austere approach with a greatly reduced footprint. USMC actively sited the ranges, Landing Zones, Base Camp, and communication towers to avoid impacts to cultural resources. In addition, Range Control would work with the community on scheduling and access planning, specifically to avoid training on days that are important to the community. USMC is working to prioritize public access to cultural resources and would limit access only when required for public health and safety or to comply with DoD safety requirements. USMC would also assess impacts to historic properties from training events and the Proposed Action footprint.

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Visual Resources	Commenters requested the EIS/OEIS account for a larger definition of visual resources (e.g., 360-degree view), and consider potential impacts to vegetation at landing beaches, potential visual impacts from fences/gates, and potential wildfires from live-fire training exercises.	USMCs proposed action was changed from heavy development with many fences to an expeditionary and austere approach with less structures that are sited as far from beaches and the public as possible. USMC prepared new visual simulations from key observation points to show potential impacts on the visual environment.
Transportation	Commenters expressed concerns about the compatibility between military airspace and commercial and civilian airport use, and whether the restriction of airspace and creation of SUA would impact commercial access during inclement weather. They also requested more information about the proposed ground transportation routes, the closure of Tinian Sea space, and potential impacts to commercial and recreational watercraft, potential future ferry service, port capacity, the condition of infrastructure, and joint use of project port facilities. Commenters also requested additional information regarding the storage and disposal of hazardous materials.	Roads inside the Military Lease Area within the current Lease Back Area are proposed to be leased from CNMI.  The Federal Aviation Administration would advise the USMC whether there is a need to establish a controlled firing area airspace designation over either or both proposed ranges. In addition, USMC would utilize spotters to observe when a non-participating vehicle or persons approach the surface danger zone or an aircraft in the airspace. All training operations would cease until the non-participant is safely out of the area.
Utilities	Commenters questioned solid waste compliance, demand on the Commonwealth Utilities Corporation system, potable water quality, wastewater treatment level, management of wastewater from vehicle wash-down at the port and from portable toilets, and stormwater management at the port to protect nearshore resources.	The USMC reduced Proposed Action would have much less of an impact on utilities. USMC updated utility studies taking into consideration the current demand and potential demand of the reduced Proposed Action. Studies include electrical, potable water, wastewater, stormwater, and solid and hazardous waste.
Socioeconomics	Commenters requested additional information regarding potential impacts to the economy, tourism, fishing, ranching, subsistence living, traditional cultural practices, community character, and Pagan resettlement. They expressed concern about increased use of ports and wharf facilities, and the housing for construction personnel.	USMC revised analysis of socioeconomic impacts in a collaborative manner with CNMI. Specifically, USMC has shared and collaborated with CNMI on the revised training concepts, changes to the alternatives, and the basic economic analysis and framework.
Public Health and Safety	Commenters requested more information regarding public health and safety, including transportation of hazardous materials, munitions constituents, unexploded ordnance, and site remediation and restoration.	In response to public concerns, the USMC reduced the Proposed Action eliminating many of the ranges and greatly reducing the footprint. USMC environmental management of compliance and pollution prevention measures serve to protect public health and maintain or improve the environmental quality of training areas and adjacent communities. These standard operating policies and procedures apply to all USMC training and include: <ul style="list-style-type: none"> <li>• REVA.</li> <li>• Annual Inspections.</li> </ul>

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Environmental Justice	Commenters questioned the environmental justice analysis methodology and suggested that impacts be considered disproportionate, in the context of the ethnic minority population and the low-income status of residents in comparison to the U.S.	USMC re-evaluated the environmental justice population and potential impacts related to the reduced Proposed Action footprint.
Cumulative Effects	Commenters questioned the cumulative impacts methodology, analysis, and mitigation.	USMC re-evaluated cumulative impacts considering the current and future project on Tinian combined with impacts from the reduced Proposed Action footprint.

*Legend:* CNMI = Commonwealth of the Northern Mariana Islands; DoD = Department of Defense; EIS/OEIS = Environmental Impact Statement/Overseas Impact Statement; NHPA = National Historic Preservation Act; U.S. = United States; USMC = United States Marine Corps; UXO = Unexploded Ordnance

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