

**Final Environmental Impact Statement**

**Commonwealth of the Northern Mariana**  
**Islands**

**Joint Military Training**

**APPENDIX L**

APPENDIX L EIS PUBLIC COMMENT RESPONSES

**June 2026**

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## APPENDIX L

### L.1 RESPONSE TO PUBLIC COMMENTS

This appendix includes public comments received on the Revised Draft Environmental Impact Statement (EIS) for the Commonwealth of the Northern Mariana Islands (CNMI) Joint Military Training.

#### L.1.1 Introduction

The U.S. Marine Corps (USMC) would like to thank elected officials, federal regulatory and local resource agencies, business and community leaders, organizations, and individuals for reviewing the CNMI Joint Military Training Revised Draft EIS, attending the public meetings, and submitting comments. Public involvement is essential to the National Environmental Policy Act (NEPA) environmental impact review process. All comments received are a part of the official project record and will be considered before a final decision is made through a formal Record of Decision.

#### L.1.2 Public Comment Period

The Notice of Availability and Notice of Public Meetings for this Revised Draft EIS were published in the Federal Register, local newspapers, and on the project website on June 6, 2025. The notice identified locations where the revised draft document was available for review; the timing of the 75-day public review and comment period; the methods for submitting new comments; and the dates, times, and locations of public meetings for this Revised Draft EIS. Additional public notices were disseminated via direct mail (stakeholder letters, postcards), emails sent to those who signed up for the mailing list and provided an email address, and through social media. An announcement of a 15-day extension to the public comment period was published in the Federal Register on August 22, 2025, and additional notices were disseminated via an e-blast sent to the project mailing list and social media. Additionally, the USMC held office hours in August 2025 at the Commonwealth Bureau of Military Affairs Tinian Field Office to provide an opportunity for additional public engagement prior to the end of the public comment period. The 90-day public comment period ended on September 4, 2025. The public was able to submit comments on the Revised Draft EIS at public meetings, via the project website (<https://www.CNMIJointMilitaryTrainingEIS.com>), or via postal mail during the 90-day public review period. A detailed list of publication dates and materials provided at the public meetings is provided in Appendix F.

### L.2 COMMENT RESPONSE PROCESS

The USMC considered all comments received on the Revised Draft EIS. Each comment submittal was reviewed, and substantive comments were identified for consideration of possible updates to the Revised Draft EIS analysis. Substantive comments generally included resource-specific methodology, analysis, or impact conclusions and the use, adequacy, or accuracy of data used to support the analysis, along with questions or comments related to the alternatives analysis and components of the Proposed Action.

A total of 83 comment submittals were received from individuals, community organizations, and local and federal government entities. This appendix presents the full text of each comment submittal received (numbered 1-83). Within each numbered submittal, substantive comments have been assigned a letter (e.g., 1A, 1B, 1C), which is used as a unique identification code for

the responses provided in Table 1. A total of 215 individual comments were identified through this process, and individual responses are provided in Table 1. Portions of comment submittals that were determined not be substantive did not receive a unique identification code, and a response is not provided in Table 1. If a change to the Final EIS was warranted based on a comment, the response in Table 1 identifies the section(s) where revisions were made within the Final EIS.

### **L.3 COMMENT LETTERS**

Comment letters are provided in the format received (i.e., website form, hand written comment form, mailed comment letter, transcript of verbal comment). Click on the green number to the left of the comment to jump to the response table.

## Comment 1

### Commentor Information

Name	Organization / Affiliation	Comment Format
Soarin Oh	Marianas High School	website

*Legend: N/A = not provided*

### Text of Comment

1A

These exercises will increase the number of harmful compounds emitted in our environment, potentially harming children and families that enter the proposed air/sea zone. Several habitats both land and sea could be polluted by exercises in this area.

## Comment 2

### Commentor Information

Name	Organization / Affiliation	Comment Format
Soarin Oh	Marianas High School	website

*Legend: N/A = not provided*

### Text of Comment

2A

The airspace taken up by this exercise would decrease the amount of space for other commercial aircrafts that carry tourists/visitors. Decreasing airspace could potentially harm the tourism market, the only industry that Saipan has.

**Comment 3**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
No Name Provided	N/A	hand-written form

Legend: N/A = not provided

**Text of Comment**



**Public Meeting Comment Form**

**Date:** 6/23/25

Please submit comments on the Revised Draft Environmental Impact Statement (EIS) and potential effects to historic properties pursuant to Section 106 of the National Historic Preservation Act.

Please check the box if your comment is applicable to the National Historic Preservation Act:

The public may submit written comments in one of the following ways:

- In person at one of the public meetings
- Through the project website: <https://www.cnmijointmilitarytrainingeis.com>
- By mail, postmarked no later than August 20, 2025 (see address below)

**Comments must be submitted by August 20, 2025**, to be considered in the preparation of the Final EIS and the National Historic Preservation Act Section 106 process.

**\*\* Please Print Clearly \*\*** Additional Space is Provided on Back \*\*

**3A**

*Dough did well on explaining*  
*- Are they going to put a military store here on Tinian??*

Please provide your mailing address to receive future notifications about the project.

1. Name: \_\_\_\_\_
2. Organization/Affiliation (if applicable): \_\_\_\_\_
3. Mailing Address: \_\_\_\_\_

*In the event the contents of specific comments are incorporated into the Marine Corps' National Environmental Policy Act analysis, released in whole or in part in response to a Freedom of Information Act request, or otherwise disclosed to the public, the Marine Corps will include the name of the individual or entity submitting the comment, but will not publish or otherwise disclose other potentially identifying information such as home addresses, e-mail addresses, or telephone numbers.*

Please turn in this form at a public meeting, submit online at <https://www.cnmijointmilitarytrainingeis.com>, or mail to:  
**CJMT Project Manager**  
**Naval Facilities Engineering Systems Command, Pacific c/o AECOM**  
**415 Chalan San Antonio Road, Suite 112, Baltej Pavilion Building**  
**Tamuning, Guam 96913**

## Comment 4

### Commentor Information

Name	Organization / Affiliation	Comment Format
Ben King	N/A	hand-written form

Legend: N/A = not provided

### Text of Comment



### Public Meeting Comment Form

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\*\* Please Print Clearly \*\* Additional Space is Provided on Back \*\*

Public Access for boaters:

4A

The area designated for small arms shooting creates numerous problems for boaters. This includes: passage carrying boaters and fishing boats.

This area is a prominent area for water fishing from August to December. To substitute the area during spring, will FADs be install elsewhere to pick up the loss of fish in that area.

4B

Night fishing - to avoid any accidents - what communication device will be available to fishermen? Some fishermen do not pay attention to any available outgoing information, i.e. alerts or other notifications - what can you do? Why most are the area east side of Tinian because prominent winds go east to west and that area is usually rough waters for fishing.

Please provide your mailing address to receive future notifications about the project.

1. Name: Ben King
2. Organization/Affiliation (if applicable): Retired
3. Mailing Address: TINIAN

In the event the contents of specific comments are incorporated into the Marine Corps' National Environmental Policy Act analysis, released in whole or in part in response to a Freedom of Information Act request, or otherwise disclosed to the public, the Marine Corps will include the name of the individual or entity submitting the comment, but will not publish or otherwise disclose other potentially identifying information such as home addresses, e-mail addresses, or telephone numbers.

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CJMT Project Manager  
 Naval Facilities Engineering Systems Command, Pacific c/o AECOM  
 415 Chalan San Antonio Road, Suite 112, Baltej Pavilion Building  
 Tamuning, Guam 96913

**Comment 5**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
Chad Ellie Borja	N/A	hand-written form

Legend: N/A = not provided

**Text of Comment**



**Date:** 6/23/25 **Public Meeting Comment Form**

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Please check the box if your comment is applicable to the National Historic Preservation Act:

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- In person at one of the public meetings
- Through the project website: <https://www.cnmijointmilitarytrainingeis.com>
- By mail, postmarked no later than August 20, 2025 (see address below)

**Comments must be submitted by August 20, 2025**, to be considered in the preparation of the Final EIS and the National Historic Preservation Act Section 106 process.

**\*\* Please Print Clearly \*\*** Additional Space is Provided on Back \*\*

5A

*Request the Navy pre-coordinate w/ CNMI Division of Fish & Wildlife prior to construction, when the Navy is doing pre-construction biological surveys so CNMI DFW can translocate and move species of concern. Like the Coconut Crab, wild chickens, wild goats, wild deer and plants like hot pepper & CNMI protected species to minimize impacts.*

Please provide your mailing address to receive future notifications about the project.

1. Name: Chad Ellie Borja
2. Organization/Affiliation (if applicable): DLNR (DFW) Solving for X
3. Mailing Address: [Redacted]

*In the event the contents of specific comments are incorporated into the Marine Corps' National Environmental Policy Act analysis, released in whole or in part in response to a Freedom of Information Act request, or otherwise disclosed to the public, the Marine Corps will include the name of the individual or entity submitting the comment, but will not publish or otherwise disclose other potentially identifying information such as home addresses, e-mail addresses, or telephone numbers.*

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 Tamuning, Guam 96913

## Comment 6

### Commentor Information

Name	Organization / Affiliation	Comment Format
Name Redacted	UNIVERSITY OF HAWAII SYSTEMS	website

*Legend: N/A = not provided*

### Text of Comment

- 6A** | On the documents page, the links for chapters 3-8, and the appendices are all broken. Please fix these so they can be reviewed.

## Comment 7

### Commentor Information

Name	Organization / Affiliation	Comment Format
Chelsy Reyes	Community Member	website

Legend: N/A = not provided

### Text of Comment

On this day, June 25, 2024, I attended the public meeting regarding the EIS proposal. I appreciated how the presenters reassured me that there won't be bombing and that there is a huge effort when it comes to involving the public and what they have to say. The plan was very well executed, but I still fear for the people and the land that we own. As a native Chamorro and Carolinian, I don't want to worry about the possible outcomes of militarization, especially on one of the smallest island in the CNMI. I don't want people seeing Tinian as just a "military boot camp." I want people all around the world to view it as what it is. A historical, beautiful, and

cultural island. When people hear Guam they associate it with military and nothing else. Guam has lost its touch with its cultural roots and I am fearful that Tinian will be a victim to that. All in all, I appreciate you all for including the people and taking out words into account.

## Comment 8

### Commentor Information

Name	Organization / Affiliation	Comment Format
Name Redacted	Member of public	website

*Legend: N/A = not provided*

### Text of Comment

The effort and explanation by the people there were great! Militarization will always be a tough topic especially for us islanders (Guam, Saipan, Tinian, Hawaii, etc.) They were reassuring on how they are trying their best to protect the environment and tolls that the training will have. My major concern is, again the environment and culture here on our islands. As long as the military RESPECTS the land and those who inhabit it, I fully trust in the US Military leadership along with the Federal and CNMI Government to make this possible in a way that not only benefits the military but also the people and communities of the CNMI. Thank you for coming out.

## Comment 9

### Commentor Information

Name	Organization / Affiliation	Comment Format
Name Redacted	N/A	website

Legend: N/A = not provided

### Text of Comment

Dear CJMT Project Manager,

As a resident of Tinian, I support responsible military training in the CNMI but oppose all live-fire or explosive training activities on our island, including those still included in the 2025 Revised Draft EIS.

While I recognize that the 2025 Revised Draft EIS scales back from previous plans, it still includes small arms, demolitions, and munitions-based exercises, which pose unacceptable risks to:

1. Our water supply (particularly with the planned fuel pipeline (the Red Hill incident in Oahu shows how easily fuel can contaminate aquifers and harm people)
2. Civilian safety (Tinian lacks emergency medical infrastructure)
3. Local environment and noise levels, even from small arms
4. Long-term hazards from new unexploded ordnance, adding to still-present WWII UXO.
5. Tinian holds significant World War II landmarks, traditional indigenous areas, and site with spiritual ancestral meaning. Live fire training near on those lands risks degrading or destroying irreplaceable parts of our heritage.

I urge the Department of Defense and Navy to:

1. Provide alternate water wells, with regular water testing
2. Remove all live fire and explosive components from the proposed training on Tinian.
3. Focus on non-live fire training only, such as logistics, communications, humanitarian relief, etc.
4. Fully remove remaining WWII unexploded ordnance.
5. Provide military-grade emergency medical facility if training continues.
6. Expand military police and fire protection to support local force.
7. Reconsider the use of a remote, uninhabited location for live fire training, if truly required.

I support military readiness - but not at the cost of our people, our safety, our cultural heritage, water, and the peace of our island. Please revise the Final EIS to reflect these concerns and withdraw all live-fire proposals for Tinian.

Thank you and Un Dangkulu na si Yu'us Ma'ase.

9A

## Comment 10

### Commentor Information

Name	Organization / Affiliation	Comment Format
Name Redacted	N/A	website

Legend: N/A = not provided

### Text of Comment

- 10A** 1. Please extend the comment period. At over 400 pages (not including the appendices), and the need for cross-reference to the MIRC and MITT (which is over 1200 pages), it's not enough time for people to digest.
- 10B** 2. Clarify the definition of "tempo" - this term is used repeatedly to describe training frequency and intensity relative to the current baseline of activity but is not clearly defined. Does it refer to an increased number of events, longer duration, or greater force presence? What will be the daily, weekly, and seasonal impact? Table 2.1-1 indicates that small training events lasting 1-2 weeks will occur routinely throughout the year. Section 4.1.3 explains that training from the Multi-Purpose Maneuver Range may require a SDZ extending anywhere from 1 to 4 miles outward. How often will this be activated?
- 10C**
3. Socioeconomic Impact - temporary activations may significantly disrupt small-boat operators, fishermen, and tourism, even if described as "intermittent" or "temporary". Short notice activations will interfere with tour schedules, fishing access, and shipping routes.
- 10D** 4. In a similar vein, PLEASE highlight the request in 4.3.3.1 which acknowledges the concern in my above comment and explicitly requests public input to assess impacts. No other part of the EIS has such a request and this needs to be underscored so that a bigger picture can be provided. Without this, it makes no sense that the tables on ES-7 could list socioeconomic impact as "less than significant".
- 10E** 5. Environmental thresholds and terminology - what does "less than significant impact" mean? Environmental impacts are frequently described throughout the EIS as such but no clear thresholds or metrics are offered. Were these determined by outside agencies? By the USMC? Who decides? Quantitative or qualitative criteria that determines when an impact crosses from "less than significant" to "significant" is a threshold that is needed for accountability purposes. Is there a public dispute mechanism to review the level of significance and adapt management accordingly?
- 10F** 6. Solid Waste - the plan proposes use of Saipan's Marpi landfill for solid waste until a site in Tinian is approved and operational. Marpi is already facing capacity concerns, and the CNMI estimates the permitting process for a new Tinian landfill would take 5 years. Has the process begun, and what is the overall timeline for establishing a military-use landfill on Tinian? How would the increased Marpi waste burden (estimated in Table 4.11-4) be managed or mitigated?

**10G** 7. Surface Danger Zone Warnings - How, in clear terms, is public access restricted during exercises? While the USCG Notice to Mariners is cited as the notification method, there is no detail on how to ensure timely, clear, and multilingual warnings, especially for non-commercial or subsistence users. Is there a coordinated civilian alert system in place that Range Control will coordinate with? Is there a real time enforcement method that Range Control will utilize before the surface radar is operational? The current plan is to utilize spotters to locate boats entering the SDZ during live training who will communicate sightings with Range Control, who in turn shuts down activity until the boater is out of the SDZ. Is there a better way?

**10H** 8. Security and Safety Infrastructure - fencing is not preferred for the Multi-Purpose Maneuver Range or Explosives Training Range because of environmental concerns; instead, signage is proposed as the means to limit access. How will public safety be ensured for children and limited English proficient individuals entering these areas? Could cultural or visual impacts of fencing be balanced with safety needs?

**10I** 9. Long-term Monitoring and Adaptive Management - the proposal includes adaptive management procedures but does not mention whether CNMI agencies or communities will have access to ongoing data (e.g. noise logs, complaints, water quality sampling, SDZ breaches, etc.). How might the CNMI formally coordinate with Range Control (and, ultimately, DOD) regarding compliance, mitigation, and community concerns?

**10J** 10. Please fix the links for the appendices. IT may have told you they are working, but they are not. I have been unable to access them on four different devices, using Microsoft Edge, Safari, and Chrome. This is an ongoing issue and raises significant transparency concerns.

## Comment 11

### Commentor Information

Name	Organization / Affiliation	Comment Format
Name Redacted	Local NMI Citizen	website

Legend: N/A = not provided

### Text of Comment

11A

My primary concern and opposition to the current plan is the closure/restriction of waters between Saipan and Tinian. As you know, for many of us, fishing is a way of life. The proposed closure of certain areas on the northwestern waters off Tinian will impose significant hardships and expose many of us to dangerous sea conditions. For those of us that travel to and from Tinian regularly to visit families, attend funerals, or fish, this will add not only a significant cost to our trips to and from Tinian but it will also prevent us from taking the shortest and safest route between the two islands.

This proposed restriction is unreasonable and unacceptable. I urge the DOD to remove this proposal altogether so that we can continue to travel between Saipan and Tinian to fish and feed our families on the routes and days we so choose. These waters and its resources are precious and sacred to us and must be respected and made available to our people to travel and fish as we so choose. Our ability to fish and to travel interisland cannot and should not be dictated by the military's activities and schedules.

## Comment 12

### Commentor Information

Name	Organization / Affiliation	Comment Format
Name Redacted	Self	website

Legend: N/A = not provided

### Text of Comment

12A

- 1) create an advisory panel, similar to the one for cultural considerations, but a Noise Advisory Panel.
- 2) Work with the Public School System to meet and educate students on the potential impact and dangers of training areas.
- 3) Create a large visible digital display board or sign on both Tinian and Saipan near busy roads to communicate with the public important schedules and notices.
- 4) Provide solar panels, solar batteries, cool roof coating vouchers for Tinian and Saipan residents and possibly noise cancelling headphones.
- 5) Allow citizens to access the PX stores.
- 6) Work with locals to create a layman's term version of the project proposal that will clarify central planning impacts including aspects that may affect the quality of life for residents such as the "preferred alternative" option.

**Comment 13**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
Bam Bam	N/A	hand-written form

Legend: N/A = not provided

**Text of Comment**



**Public Meeting Comment Form**

**Date:** Aug. 24, 2025

Please submit comments on the Revised Draft Environmental Impact Statement (EIS) and potential effects to historic properties pursuant to Section 106 of the National Historic Preservation Act.

Please check the box if your comment is applicable to the National Historic Preservation Act:

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- In person at one of the public meetings
- Through the project website: <https://www.cnmijointmilitarytrainingeis.com>
- By mail, postmarked no later than August 20, 2025 (see address below)

**Comments must be submitted by August 20, 2025**, to be considered in the preparation of the Final EIS and the National Historic Preservation Act Section 106 process.

**\*\* Please Print Clearly \*\*** Additional Space is Provided on Back \*\*

13A

\* EXPLOSIVE SITE AREA - (MT. LASSO), MY BIGGEST CONCERN  
LIE WITHIN THE EXPLOSIVE AREA. THE REASON I BRING  
IT UP, IS BECAUSE WE HAVE HIDDEN MEDICINAL PLANTS  
AND WILDFRUIT BAT ROOSTING AREA. I WOULD RECOMMEND  
MOVING THE EXPLOSIVE AREA TO PIÑA, THE SAME  
PLACE WHERE DFEMS DETONATES THE UNEXPLODED ORDNANCES.

Please provide your mailing address to receive future notifications about the project.

1. Name: BAMBAM
2. Organization/Affiliation (if applicable): MUT
3. Mailing Address: \_\_\_\_\_

*In the event the contents of specific comments are incorporated into the Marine Corps' National Environmental Policy Act analysis, released in whole or in part in response to a Freedom of Information Act request, or otherwise disclosed to the public, the Marine Corps will include the name of the individual or entity submitting the comment, but will not publish or otherwise disclose other potentially identifying information such as home addresses, e-mail addresses, or telephone numbers.*

Please turn in this form at a public meeting, submit online at <https://www.cnmijointmilitarytrainingeis.com>, or mail to:

**CJMT Project Manager**  
**Naval Facilities Engineering Systems Command, Pacific c/o AECOM**  
**415 Chalan San Antonio Road, Suite 112, Baltej Pavilion Building**  
**Tamuning, Guam 96913**

## Comment 14

### Commentor Information

Name	Organization / Affiliation	Comment Format
Bill	N/A	hand-written form

Legend: N/A = not provided

### Text of Comment



### Public Meeting Comment Form

Date: 6/24/2025

Please submit comments on the Revised Draft Environmental Impact Statement (EIS) and potential effects to historic properties pursuant to Section 106 of the National Historic Preservation Act.

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Comments must be submitted by August 20, 2025, to be considered in the preparation of the Final EIS and the National Historic Preservation Act Section 106 process.

\*\* Please Print Clearly \*\* Additional Space is Provided on Back \*\*

1. The Public Hearing is well organized

2. Questions were answered

3. The community in general supports DOD's plans

4. Concerns of Tinian residents were included in the amended EIS

5. The sentiment of many residents is that Tinian will become that much smaller in the future and will be best for DOD to acquire the entire island - people are willing to relocate for the right price.

Please provide your mailing address to receive future notifications about the project.

1. Name: Bill
2. Organization/Affiliation (if applicable): Resident
3. Mailing Address: \_\_\_\_\_

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CJMT Project Manager  
 Naval Facilities Engineering Systems Command, Pacific c/o AECOM  
 415 Chalan San Antonio Road, Suite 112, Baltej Pavilion Building  
 Tamuning, Guam 96913

**Comment 15**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
Gil C. Borja	N/A	hand-written form

Legend: N/A = not provided

**Text of Comment**



**Public Meeting Comment Form**

**Date:** June 24 2025

Please submit comments on the Revised Draft Environmental Impact Statement (EIS) and potential effects to historic properties pursuant to Section 106 of the National Historic Preservation Act.

Please check the box if your comment is applicable to the National Historic Preservation Act:

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- Through the project website: <https://www.cnmijointmilitarytrainingeis.com>
- By mail, postmarked no later than August 20, 2025 (see address below)

**Comments must be submitted by August 20, 2025**, to be considered in the preparation of the Final EIS and the National Historic Preservation Act Section 106 process.

15A

*\*\* Please Print Clearly \*\* Additional Space is Provided on Back \*\**  
the  
Can Prior to doing clearing in the MLA, I <sup>ask</sup> the that CNME  
Fish and wildlife be notified to removed all coconut crabs from  
the MLA Areas and be relocated to the 1/3 area of our island.

Please provide your mailing address to receive future notifications about the project.

1. Name: Gil C. Borja
2. Organization/Affiliation (if applicable): Dept of Lands and Natural Resources
3. Mailing Address: [REDACTED]

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**CJMT Project Manager**  
**Naval Facilities Engineering Systems Command, Pacific c/o AECOM**  
**415 Chalan San Antonio Road, Suite 112, Baltej Pavilion Building**  
**Tamuning, Guam 96913**

**Comment 16**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
David M. Evangelista	N/A	hand-written form

Legend: N/A = not provided

**Text of Comment**



**Public Meeting Comment Form**

**Date:** 6/21/25

Please submit comments on the Revised Draft Environmental Impact Statement (EIS) and potential effects to historic properties pursuant to Section 106 of the National Historic Preservation Act.

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**\*\* Please Print Clearly \*\* Additional Space is Provided on Back \*\***

I Totally Support Military build up we must protect our Nation public interest and keep America safe and Great AGAIN!

Please provide your mailing address to receive future notifications about the project.

1. Name: David M Evangelista
2. Organization/Affiliation (if applicable): self employed
3. Mailing Address: [REDACTED]

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**Comment 17**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
Islander	N/A	hand-written form

Legend: N/A = not provided

**Text of Comment**



**Public Meeting Comment Form**

Date: 6/24/25

Please submit comments on the Revised Draft Environmental Impact Statement (EIS) and potential effects to historic properties pursuant to Section 106 of the National Historic Preservation Act.

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\*\* Please Print Clearly \*\* Additional Space is Provided on Back \*\*

*If the U.S. Military wants the island of Tinian so bad for training ground, why not purchase the island outright? Many islanders would take that offer. We don't want to live on a military base which is where Tinian is heading and will eventually become a full fledge military base.*

Please provide your mailing address to receive future notifications about the project. - over -

1. Name: Islander
2. Organization/Affiliation (if applicable): Tinian People
3. Mailing Address: "Military Base Tinian"

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\*\* Please Print Clearly \*\*

Offer the people the choice. If the number is right, people will gladly move away, I would. Elected officials were given the idea but for some unknown reason(s), they are not acting on it. This is a serious issue!

Take the saying you: "Build it and they will come". Make the offer and we (islanders) will leave in a heartbeat.

There will be negotiations and must be in an agreement with the affected people. Put it out on a vote and if 75% of the people agreed, then we go from there. This is not a laughable matter. The people on Tinian are tired of all these conversations going on. The US Military wants Tinian, Bury from the islanders. All the planning is geared towards military buildup but no plans to build up any bomb shelters for the islanders. Are the islanders considered "Collateral Damage" ~~when~~ when Choo breaks out. Bury Tinian and you can do whatever the heck you Military wants to do. All these "horse and pony show" are great but no one is saying what Tinian will look like 15-20 years from now.

YOUR INPUT MATTERS

Thank you.

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## Comment 18

### Commentor Information

Name	Organization / Affiliation	Comment Format
Alvin John	N/A	hand-written form

Legend: N/A = not provided

### Text of Comment



### Public Meeting Comment Form

Date: June 24, 2025

Please submit comments on the Revised Draft Environmental Impact Statement (EIS) and potential effects to historic properties pursuant to Section 106 of the National Historic Preservation Act.

Please check the box if your comment is applicable to the National Historic Preservation Act:

The public may submit written comments in one of the following ways:

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18A | *\*\* Please Print Clearly \*\* Additional Space is Provided on Back \*\**  
 1) Line of sight map to the surface radar sight - how far will the boats be able to see the surface Radar?

18B | 2) My concern about the Explosive Training Range is the Monanas fruit bat that is roosting or sleeping in the caves at Mt. Lasso. The explosive sounds will definitely chase and scare them away. The other thing is the explosive will chase any animals away from the area.

18C | 3) My third concern is the jets that will be flying. I was at the cow pasture area attending to the cows. I heard one of the jets flying by and I almost got deaf. My eardrum started to

Please provide your mailing address to receive future notifications about the project.

1. Name: Alvin John
2. Organization/Affiliation (if applicable): DFW
3. Mailing Address: [REDACTED]

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## Comment 19

### Commentor Information

Name	Organization / Affiliation	Comment Format
Ignacio P. Kiyoshi	N/A	hand-written form

Legend: N/A = not provided

### Text of Comment



### Public Meeting Comment Form

Date: June 24, 2025

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\*\* Please Print Clearly \*\* Additional Space is Provided on Back \*\*

19A

- The ground maintenance in the MCA - Military Land Area lease is unclear as to the ongoing maintenance on National Historic Properties and roadways are not solidly to the upkeep and beautification maintenance.

19B

- The preservation and conservation on wildlife habitats and medicinal and hot pepper is not getting the protection and conservation it deserves, during construction phases in the MCA.

- Publication of this development (CJMT) is a must to this project.   
 *share and others to read out the start and of this project.*

Please provide your mailing address to receive future notifications about the project.

1. Name: Kiyoshi, Ignacio P.
2. Organization/Affiliation (if applicable): office of the Mayor
3. Mailing Address: [REDACTED]

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**Comment 20**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
Joanne Merrick	N/A	hand-written form

Legend: N/A = not provided

**Text of Comment**



**Public Meeting Comment Form**

**Date:** 6-24-2025

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**\*\* Please Print Clearly \*\* Additional Space is Provided on Back \*\***

20A

20B

- ① Job Potential to monitor a new area for dumping so there is no illegal dumping -
- ② I feel the roads to the new area should be paved & maintained as respect for the residents of Tinian
- ③ If there is a fee to dump what will the fees be and for what specifically.
- ④ Compensation to Tinian for Military use - possibly a car/metal crusher or equipment to help with a proper dump function. Rubber shredder for tires. The shredded rubber can be used in playground areas.
- ⑤ Compensation a runway for wheel chairs down to the beach. Or a (sand) wheelchair that the community could use.

Please provide your mailing address to receive future notifications about the project.

1. Name: Joanne Merrick
2. Organization/Affiliation (if applicable): Resident
3. Mailing Address: [REDACTED]

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

- 20B ② Has there been a Poll taken for location for new dump? Why was the location chosen in the proposal?
- ⑦ The roadway to new dump site should be paved as heavy loads tear up gravel roads & it is not good for cars, trucks nor the roadway.
- 20C ⑧ Have there been any other locations considered?
- ⑨ Waterway cargo - Limitations + closures how will everyone be notified.
- 20B ⑩ Trash pick up has still not been accomplished - what can be done?
- ⑪ Compensation for the stress levels put on residents lives.
- ⑫ much in reports have been said to be (negligible) when it doesn't seem that way to residents.
- 20C ⑬ Will we be given a list of times of flights so that we are prepared to negotiate our responses for instance I have PTSD and moved back to the island for peace & quiet. I was stressed with hearing sirens quite frequently in the States.

**YOUR INPUT MATTERS**

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**Comment 21**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
Jeremy L. Santos	N/A	hand-written form

Legend: N/A = not provided

**Text of Comment**



**Public Meeting Comment Form**

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21A

*\*\* Please Print Clearly \*\* Additional Space is Provided on Back \*\**  
 I was wondering if it is possible to have a presentation of this proposed plan to the students at Tinian High School or to the cadets in the JROTC program in the school. I think this is a great project that is happening on our island, and I think the students should be well informed about what is going on, whether through a presentation during the school year, or a field trip up north to see the proposed plan sites in the proposed plan, like the repurpose IBB, it would be beneficial for both parties since students ~~could be~~ can be informed about this plan and they can give their comments and/or concerns regarding it. For a school presentation, please reach out to the school principal. For a presentation with our JROTC unit, you could contact me, for I am the current Battalion Commander, and I will forward it to my instructors and my cadet leadership.

Please provide your mailing address to receive future notifications about the project.

1. Name: Jeremy L. Santos
2. Organization/Affiliation (if applicable): STVCO/Student Council, JROTC, NHS
3. Mailing Address: [Redacted]

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 Tamuning, Guam 96913

**Comment 22**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
Kayjon B.	N/A	hand-written form

Legend: N/A = not provided

**Text of Comment**



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**Date:** 06/25/25

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**\*\* Please Print Clearly \*\*** Additional Space is Provided on Back \*\*

22A

1) Will all incoming military personnel be conditioned on respecting local customs, wildlife, etc. prior to arrival?

22B

2) How will locals be informed of ongoing live fire exercises, more specifically boats coming outside of Tinian so they may avoid potentially coming within range of stray bullets?

22A

3) How involved will all <sup>incoming</sup> military personnel be with the local community?

4) Will Tinian be considered a potential target by foreign threats due to how far removed it is from mainland U.S.? If so, how protected is the island?

22C

5) What is CUC's priority in the event that all on-island power lines need repair/maintenance?  
6) What organization inures the cost of maintaining the newly established water wells, power lines, facilities, etc.?

Please provide your mailing address to receive future notifications about the project.

1. Name: Kayjon B.
2. Organization/Affiliation (if applicable): \_\_\_\_\_
3. Mailing Address: ~~PO Box~~ Email: [REDACTED]

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**Tamuning, Guam 96913**

**Comment 23**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
Grace Choi	N/A	hand-written form

Legend: N/A = not provided

**Text of Comment**



**Public Meeting Comment Form**

Date: 6/25/2025

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**\*\* Please Print Clearly \*\* Additional Space is Provided on Back \*\***

23A

As a community member of the Marianas, I am demanding an extension to both the CJMT and MITT public comment deadlines. There is not enough time to review and respond to these documents.

23B

Another demand is that the ~~public~~ community has full and accessible public access to the documents. We demand comprehensive in-language summaries that break down the dense, scientific language into clear, understandable terms for our people. Access means more than translation, it means understanding.

It is not fair to give such a limited time to respond to a very dense/heavy statement.

Please provide your mailing address to receive future notifications about the project.

1. Name: Grace Choi
2. Organization/Affiliation (if applicable): community member of the Marianas
3. Mailing Address: \_\_\_\_\_

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**Comment 24**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
No Name Provided	N/A	hand-written form

Legend: N/A = not provided

**Text of Comment**



**Public Meeting Comment Form**

Date: 6/25/2025

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\*\* Please Print Clearly \*\* Additional Space is Provided on Back \*\*

<u>Used Oil Disposal Companies:</u>	
<u>Saipan:</u>	<u>Tinian:</u>
<u>ARON Corp.</u>	<u>(670) 433-0422</u>
<u>(670) 235-3053</u>	<u>Tinian Shipping Services: Overseas Transport</u>
<u>Y.K. Sunshine Laundry</u>	<u>Used oil/Waste/Haz-Waste</u>
<u>(670) 288-0471</u>	<u>(670) 322-6478</u>

Please provide your mailing address to receive future notifications about the project.

1. Name: ~~XXXXXXXXXX~~
2. Organization/Affiliation (if applicable): \_\_\_\_\_
3. Mailing Address: \_\_\_\_\_

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**Comment 25**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
Ji Hije Choi	N/A	hand-written form

Legend: N/A = not provided

**Text of Comment**



**Public Meeting Comment Form**

Date: 6/25/25

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\*\* Please Print Clearly \*\* Additional Space is Provided on Back \*\*

25A

We demand:

1) At least a 45-day extension to both the CJMT and MITT public comment deadlines, because people need more time to review and respond meaningfully.

25B

2) Full and accessible public access to the documents. This would mean printed copies being accessible/available on each island. Additionally, comprehensive in-language summaries that break down dense, scientific jargon into clear, understandable terms for ~~the~~ people are absolutely necessary. We demand not just translation but also understanding.

3) That CNMI agencies w/ environmental and community oversight speak up. Agencies like BECO, DPL, HPO, and DER should review the EIS and publicly submit comments.

Please provide your mailing address to receive future notifications about the project.

1. Name: Ji Hije Choi
2. Organization/Affiliation (if applicable): Putehi Guahan
3. Mailing Address: \_\_\_\_\_

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25B

continuation...

4) A commitment to meaningful community consent - not just comment collection, because public input shouldn't be a checkbox. Our voice should shape the outcome.

**Comment 26**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
Ignacio Joaquin C. Dela Cruz	N/A	hand-written form

Legend: N/A = not provided

**Text of Comment**



**Public Meeting Comment Form**

Date: June 25, 2025

Please submit comments on the Revised Draft Environmental Impact Statement (EIS) and potential effects to historic properties pursuant to Section 106 of the National Historic Preservation Act.

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*\*\* Please Print Clearly \*\* Additional Space is Provided on Back \*\**

*I appreciate the effort that has been put into the GIS and public meetings. I still have concerns with line five of zoning regulations but speaking with folks here, I get to learn and educate myself. I feel that although we have our concerns with the ranges, noise pollution, and the potential impacts it would be good for us to hear information we may not agree with or feel comfortable with. I came here with an open mind and I am glad I did.*

*Please provide your mailing address to receive future notifications about the project.*

1. Name: Ignacio Joaquin C. Dela Cruz
2. Organization/Affiliation (if applicable): \_\_\_\_\_
3. Mailing Address: [REDACTED]

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**Comment 27**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
No Name Provided	N/A	hand-written form

Legend: N/A = not provided

**Text of Comment**



**Public Meeting Comment Form**

**Date:** June 25, 2025

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- Through the project website: <https://www.cnmijointmilitarytrainingeis.com>
- By mail, postmarked no later than August 20, 2025 (see address below)

**Comments must be submitted by August 20, 2025**, to be considered in the preparation of the Final EIS and the National Historic Preservation Act Section 106 process.

\*\* Please Print Clearly \*\* Additional Space is Provided on Back \*\*

27A

1. WILL THE CNMIF BE ABLE TO AVAIL TO THE USE OF THE RANGE WHEN IS NOT UTILIZED BY THE MILITARY?
2. COULD WE (CNMIF) AVAIL TO THE SKILSETS BROUGHT INTO THE ISLAND RELATIVE TO THE CNMIF LAW ENFORCEMENT AGENCIES.
3. IS GREAT TO HEAR THAT THE BEACH IS NOT COMPLETELY CLOSED OFF.

27B

4. THE PROPOSED SAFETY ZONE MAY IMPACT SHIPPING LINES AND I RECOMMEND ENGAGEMENT WITH PORT OPERATOR AND USERS, AS IT MAY HAVE SOME IMPACT TO VESSELS ARRIVING SHOULD THE TRAINING DATE COME W/ THE TRAINING DATE.

Please provide your mailing address to receive future notifications about the project.

1. Name: [Signature]
2. Organization/Affiliation (if applicable): \_\_\_\_\_
3. Mailing Address: \_\_\_\_\_

In the event the contents of specific comments are incorporated into the Marine Corps' National Environmental Policy Act analysis, released in whole or in part in response to a Freedom of Information Act request, or otherwise disclosed to the public, the Marine Corps will include the name of the individual or entity submitting the comment, but will not publish or otherwise disclose other potentially identifying information such as home addresses, e-mail addresses, or telephone numbers.

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CJMT Project Manager  
 Naval Facilities Engineering Systems Command, Pacific c/o AECOM  
 415 Chalan San Antonio Road, Suite 112, Baltej Pavilion Building  
 Tamuning, Guam 96913

**Comment 28**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
No Name Provided	N/A	hand-written form

Legend: N/A = not provided

**Text of Comment**



**Public Meeting Comment Form**

**Date:** 06/24/2025

Please submit comments on the Revised Draft Environmental Impact Statement (EIS) and potential effects to historic properties pursuant to Section 106 of the National Historic Preservation Act.

Please check the box if your comment is applicable to the National Historic Preservation Act:

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- By mail, postmarked no later than August 20, 2025 (see address below)

**Comments must be submitted by August 20, 2025**, to be considered in the preparation of the Final EIS and the National Historic Preservation Act Section 106 process.

**\*\* Please Print Clearly \*\* Additional Space is Provided on Back \*\***

THE CNMI DOES NOT NEED AN INCREASE IN MILITARY PRESENCE. THE CNMI WILL NOT BENEFIT FROM MILITARY PRESENCE. LOOKING AT THE ENVIRONMENTAL IMPACT STATEMENT, OUR PEOPLE WILL LOSE OUR LAND, OUR RESOURCES, AND OUR SAFETY. I DON'T SEE HOW LIVE FIRE TRAINING RIGHT NEXT TO HOMES, SCHOOLS, AND FARMS IS CONSIDERED SAFE. THE CNMI IS BEST IN THE NATIVE PEOPLE'S HAND AND IT SHOULD STAY THAT WAY. KEEP THE US' MILITARY OUT OF OUR ISLANDS. KEEP NATIVE LANDS IN NATIVE HANDS.

Please provide your mailing address to receive future notifications about the project.

1. Name: \_\_\_\_\_
2. Organization/Affiliation (if applicable): \_\_\_\_\_
3. Mailing Address: \_\_\_\_\_

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**Naval Facilities Engineering Systems Command, Pacific c/o AECOM**  
**415 Chalan San Antonio Road, Suite 112, Baltej Pavilion Building**  
**Tamuning, Guam 96913**

## Comment 29

### Commentor Information

Name	Organization / Affiliation	Comment Format
No Name Provided	N/A	hand-written form

Legend: N/A = not provided

### Text of Comment



### Public Meeting Comment Form

Date: \_\_\_\_\_

Please submit comments on the Revised Draft Environmental Impact Statement (EIS) and potential effects to historic properties pursuant to Section 106 of the National Historic Preservation Act.

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- Through the project website: <https://www.cnmijointmilitarytrainingeis.com>
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**Comments must be submitted by August 20, 2025**, to be considered in the preparation of the Final EIS and the National Historic Preservation Act Section 106 process.

**\*\* Please Print Clearly \*\* Additional Space is Provided on Back \*\***

FUCK YOU  
and YOUR  
GREED!

Please provide your mailing address to receive future notifications about the project.

1. Name: \_\_\_\_\_
2. Organization/Affiliation (if applicable): \_\_\_\_\_
3. Mailing Address: \_\_\_\_\_

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Tamuning, Guam 96913

**Comment 30**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
Karen Pedersen	N/A	hand-written form

Legend: N/A = not provided

**Text of Comment**



**Public Meeting Comment Form**

Date: 6/25

Please submit comments on the Revised Draft Environmental Impact Statement (EIS) and potential effects to historic properties pursuant to Section 106 of the National Historic Preservation Act.

Please check the box if your comment is applicable to the National Historic Preservation Act:

The public may submit written comments in one of the following ways:

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- Through the project website: <https://www.cnmijointmilitarytrainingeis.com>
- By mail, postmarked no later than August 20, 2025 (see address below)

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\*\* Please Print Clearly \*\* Additional Space is Provided on Back \*\*

30A

1. Please make the notification system for ~~the~~ Saipan and Tinian -

30B

2. What is your plan to handle cases of PTSD with the locals? many veterans and some with issues with gunfire and explosives. Where are they supposed to go during training?

Please provide your mailing address to receive future notifications about the project.

- Name: Karen Pedersen
- Organization/Affiliation (if applicable): \_\_\_\_\_
- Mailing Address: \_\_\_\_\_

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 Tamuning, Guam 96913

**Comment 31**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
Cecilio Raiukiulipiy	N/A	hand-written form

Legend: N/A = not provided

**Text of Comment**



**Public Meeting Comment Form**

Date: 6/25/25

Please submit comments on the Revised Draft Environmental Impact Statement (EIS) and potential effects to historic properties pursuant to Section 106 of the National Historic Preservation Act.

Please check the box if your comment is applicable to the National Historic Preservation Act:

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- Through the project website: <https://www.cnmjointmilitarytrainingeis.com>
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\*\* Please Print Clearly \*\* Additional Space is Provided on Back \*\*

31A

<sup>life</sup> ~~No firing range in Tinian~~ - from - Cecilio

\* Why two firing range? - from - Cecilio

31B

\* Any compensation for members who traveled outside of firing range zone?

Please provide your mailing address to receive future notifications about the project.

1. Name: Cecilio Raiukiulipiy
2. Organization/Affiliation (if applicable): \_\_\_\_\_
3. Mailing Address: \_\_\_\_\_

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 Tamuning, Guam 96913

**Comment 32**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
Samantha	N/A	hand-written form

Legend: N/A = not provided

**Text of Comment**



**Public Meeting Comment Form**

**Date:** June 25, 2025

Please submit comments on the Revised Draft Environmental Impact Statement (EIS) and potential effects to historic properties pursuant to Section 106 of the National Historic Preservation Act.

Please check the box if your comment is applicable to the National Historic Preservation Act:

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- Through the project website: <https://www.cnmijointmilitarytrainingeis.com>
- By mail, postmarked no later than August 20, 2025 (see address below)

**Comments must be submitted by August 20, 2025**, to be considered in the preparation of the Final EIS and the National Historic Preservation Act Section 106 process.

**\*\* Please Print Clearly \*\*** Additional Space is Provided on Back \*\*

I submit this comment in strong and unequivocal opposition to the proposed military expansion on the island of Tinian. This action represents a continued form of military occupation, environmental violence, and cultural erasure that disregards the rights, lives, and voices of the people who belong to this land.

We already live with the generational trauma of colonization. Adding military noise, toxic waste, restricted access to land, the threat of displacement only deepens the psychological harm. How are we supposed to raise families, gather food, perform ceremony

Please provide your mailing address to receive future notifications about the project.

1. Name: Samantha
2. Organization/Affiliation (if applicable): N/A
3. Mailing Address: [REDACTED]

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**Naval Facilities Engineering Systems Command, Pacific c/o AECOM**  
**415 Chalan San Antonio Road, Suite 112, Baltej Pavilion Building**  
**Tamuning, Guam 96913**

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

under the shadow of military occupation. This proposal was not shared in a manner that allowed for meaningful community involvement. This process lacked transparency, cultural sensitivity, and accountability. I am concerned about:

32A

- Live fire training will leave behind lead, copper, and heavy metals that can seep into soil / groundwater. This threatens local wells, crops, and ocean ecosystems.

32B

- Amphibious landings introduce oil, fuel, and lubricant spills directly into the shoreline - killing coral reefs, harming marine life, and contaminating traditional fishing waters.

- Social / Economic Disruption: Tourism - already struggling - will decline due to the presence of loud, visible military activity near beaches, resorts, historical sites

- Militarization directly undermines the indigenous sovereignty and self-determination by placing land under foreign military control without meaningful input from the people who belong to it

- Residents living near the lease area will face devaluation of land and homes due to contamination and noise, with no compensation or relocation plan.

- The military's year-round presence will introduce a militarized surveillance and occupation atmosphere to a peaceful island community, with increased restriction and tension.

32C

- There is no guarantee of the protection or access to sacred Chamorro sites, including burial grounds, latte sites, or coastal fishing areas. Live fire training and vehicle movement could destroy these sites forever. That is not just environmental damage, it is cultural violence.

#### YOUR INPUT MATTERS

Please turn in this form at a public meeting, submit online at <https://www.cnmjointmilitarytraining.com>, or mail to:

CJMT Project Manager  
Naval Facilities Engineering Systems Command, Pacific c/o AECOM  
415 Chalan San Antonio Road, Suite 112, Baltej Pavilion Building  
Tamuning, Guam 96913

**Comment 33**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
Angela Dela Cruz	N/A	hand-written form

Legend: N/A = not provided

**Text of Comment**



**Public Meeting Comment Form**

Date: 06/26/25

Please submit comments on the Revised Draft Environmental Impact Statement (EIS) and potential effects to historic properties pursuant to Section 106 of the National Historic Preservation Act.

Please check the box if your comment is applicable to the National Historic Preservation Act:

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- Through the project website: <https://www.cnmijointmilitarytrainingeis.com>
- By mail, postmarked no later than August 20, 2025 (see address below)

Comments must be submitted by August 20, 2025, to be considered in the preparation of the Final EIS and the National Historic Preservation Act Section 106 process.

\*\* Please Print Clearly \*\* Additional Space is Provided on Back \*\*

I suggest reaching out to local companies like Saipan Crew Boat, Sakman, Tinian shipping & 'Lucky Harvest' as well as the Western Pacific Regional fishing management council when schedules are develop for the firing ranges on Tinian so that they may help w/ informing other individuals & companies that sea travel between Saipan & Tinian.

Please provide your mailing address to receive future notifications about the project.

1. Name: Angela Dela Cruz
2. Organization/Affiliation (if applicable): \_\_\_\_\_
3. Mailing Address: [REDACTED]

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 Naval Facilities Engineering Systems Command, Pacific c/o AECOM  
 415 Chalan San Antonio Road, Suite 112, Baltej Pavilion Building  
 Tamuning, Guam 96913

**Comment 34**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
Ignacio V. Cabrera	N/A	hand-written form

Legend: N/A = not provided

**Text of Comment**



**Public Meeting Comment Form**

Date: 6/26/25

Please submit comments on the Revised Draft Environmental Impact Statement (EIS) and potential effects to historic properties pursuant to Section 106 of the National Historic Preservation Act.

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Comments must be submitted by August 20, 2025, to be considered in the preparation of the Final EIS and the National Historic Preservation Act Section 106 process.

\*\* Please Print Clearly \*\* Additional Space is Provided on Back \*\*

34A

During live BREWERS of 50 Cal. and within the CNMI 3 miles territorial water, and accidentally hit a marine animal such whale and killed it, who is responsible for cleanup and disposing of the carcass, cost a cleanup and will pay for it. please provide a clear map showing the military/submerged land between point to point to the IFING PAGE

34B

x What does the cony gets for users the CNMIS 3 miles territorial water

Please provide your mailing address to receive future notifications about the project.

1. Name: Ignacio V. Cabrera
2. Organization/Affiliation (if applicable): \_\_\_\_\_
3. Mailing Address: \_\_\_\_\_

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 Tamuning, Guam 96913

**Comment 35**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
Ignacio V. Cabrera	N/A	hand-written form

Legend: N/A = not provided

**Text of Comment**



**Public Meeting Comment Form**

Date: 6/26/25

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**Comments must be submitted by August 20, 2025**, to be considered in the preparation of the Final EIS and the National Historic Preservation Act Section 106 process.

**\*\* Please Print Clearly \*\* Additional Space is Provided on Back \*\***

35A

What plans are in place to address the military junk yard during the early Fifties? Junk yard includes old airplane military hardware used during the war. Please provide answer in the final EIS.

Please provide your mailing address to receive future notifications about the project.

1. Name: Ignacio V. Cabrera
2. Organization/Affiliation (if applicable): \_\_\_\_\_
3. Mailing Address: \_\_\_\_\_

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 Naval Facilities Engineering Systems Command, Pacific c/o AECOM  
 415 Chalan San Antonio Road, Suite 112, Baltej Pavilion Building  
 Tamuning, Guam 96913

## Comment 36

### Commentor Information

Name	Organization / Affiliation	Comment Format
Name Redacted	N/A	website

Legend: N/A = not provided

### Text of Comment

Hafa adai,

36A

As a biologist who surveyed all of the proposed sites for this CNMI Joint Military Training EIS, I strongly oppose the military's location choice for the proposed explosives training range at Mt. Lasso. The island of Tinian has very few remaining pristine limestone forests, the majority of the forested area is occupied by non-native tangán-tangan and other invasive shrubs and weeds. These areas do not offer high quality habitat to most flora and fauna. Masalok and Mt. Lasso, on the other hand, provide the highest quality habitat for endangered species on Tinian. Mt. Lasso specifically is inhabited by the Mariana fruit bat or fanihi (*Pteropus mariannus mariannus*). This species occupies the forest as there are several high value tree species that provide a variety of food for the fruit bat. The noise that would be generated from an explosives training range would disturb the fruit bats to such an extent that they would not be able to forage or roost without considerable amount of disturbance, most likely so much that they would not be able to occupy the forest anymore.

36B

Besides the fanihi, there are 2 other ESA-listed species that would be negatively impacted by this proposed action: Mt. Lasso has one of the highest densities of endemic epiphytic orchids: *Dendrobium guamense* is a species that is listed as "threatened" under the ESA; it thrives in this forest, and should be protected at all costs, since there were very few other locations on Tinian in which this orchid was detected. Furthermore, the fadang (*Cycas micronesica*), which is also listed as "threatened" under the ESA, has been outplanted in several experimental plots at the base of Mt. Lasso. While this species did not historically occur on Tinian, it has been outplanted as a genetic back-up for Guam's cycads, which have been drastically declining in the past years due to the introduction of two invasive species: The Asian cycad scale and the cycad blue butterfly. It saddens me to imagine all the hard work that was invested in making this project successful only for the cycads to be impacted by this sort of activity. Since Asian cycad scale (*Aulacaspis yasumatsui*) and cycad blue butterfly (*Luthrodes pandava*) are also present in Tinian, the outplanted trees require regular pest control maintenance to ensure that they stay healthy.

36C

As someone who lives on Guam, a practically birdless island, visiting Mt. Lasso is a special treat: a forest filled with the song of so many native bird species, all of which would be negatively impacted by the noise disturbance of this proposed activity.

36D

Lastly, Mt. Lasso is also used recreationally by the people of Tinian for hunting and foraging, especially to collect the sought-after *donne sali* or red chili pepper. I hope that access would not be restricted to this forest. I beseech the USMC to choose an alternative location (NOT MASALOK!) for their proposed explosives training range. Thank you.

**Comment 37**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
Name Redacted	Our Common Wealth 670	website

*Legend: N/A = not provided*

**Text of Comment**

Thank you for the opportunity to participate in this important process.

[Text of comment begins on the following page]



August 1, 2025

CJMT Project Manager  
Naval facilities Engineering Systems Command  
Pacific % AECOM  
415 Chalan San Antonio Road, Suite 112  
Baltej Pavilion Building  
Tamuning, Guam 96913

Re: CNMI Joint Military Training Revised Draft Environmental Impact Statement Public Comments

Submitted by: Our Common Wealth 670, a community-based advocacy organization committed to research, education, and awareness of militarization in the Marianas

Dear CJMT Project Manager:

On behalf of Our Common Wealth 670, we respectfully submit the following comments on the 2025 Revised Draft Environmental Impact Statement for the CNMI Joint Military Training (CJMT). As a community-based organization rooted in the Northern Mariana Islands, we are deeply committed to protecting the environmental integrity, cultural heritage, and community well-being of the Marianas. We urge the Department of Defense to meaningfully consider the voices of our residents and Indigenous Peoples, who have long expressed concerns about the scale, scope, and cumulative impacts of ongoing militarization in our islands and the region.

Our formal comments in the attached documentation address specific concerns regarding:

- The insufficient analysis of cultural and historical site impacts
- Threats to endangered species and ecologically sensitive areas
- The lack of meaningful community engagement and consultation, including free, prior and informed consent
- The need for alternatives that do not compromise public access or environmental health

We call for greater transparency, accountability, and a genuine commitment to minimizing harm to the people and ecosystems of the CNMI and broader Marianas. We encourage robust public engagement and transparent information sharing in this and related proposals and activities. We also recommend that the Department of Defense consider selecting the "no-action" alternative for this proposal as a responsible path forward, consistent with the stewardship values our islands strive to uphold. Thank you for the opportunity to participate in this important process.

Respectfully,  
Our Common Wealth 670  
Saipan, MP 96950

Email: [ourcommonwealth670@gmail.com](mailto:ourcommonwealth670@gmail.com)

## General Introduction / Summary

37A

This revised “Commonwealth of the Northern Mariana Islands Joint Training and Testing Draft Environmental Impact Statement” (CNMI CJMT DEIS) contains procedural and substantive shortcomings that undermine the National Environmental Policy Act (NEPA) and do a disservice to the public, segmenting interconnected actions that obscure the connectedness of the ever-increasing military build-up in the CNMI and broader Marianas. The comments provided here on behalf of Our Common Wealth 670 aim to help identify procedural and substantive shortcomings, and consolidate questions and comments of our members. We have provided constructive feedback to ensure that this and future DEISs from the U.S. Marine Corps (USMC) and others comply with the requirements and intent of NEPA, improve active engagement in appropriate community consultations and consent, and achieve improved outcomes for the people of the CNMI. This is of utmost importance as the Department of Defense (DoD) ramps up activities in these islands which remain a self-governing unincorporated territory of the United States.

While this CJMT DEIS is sponsored by the USMC, we note that there are numerous concurrent activities and actors across DoD branches. This comment letter references the DoD at large. An acronym page is included at the end of these comments to provide clear, straightforward definitions for all readers, both DoD personnel and the general public, helping ensure a shared understanding without relying on the specialized language of the Military Industrial Complex (MIC). We have referenced specific sections and page numbers where our comments apply, with all comments highlighted in [blue font](#) for easy identification.

37B

As we will detail further in the procedural comments that follow, this report lacks basic signposting common to similar impact assessments such as a titled Table of Contents and easily accessible supporting appendices. This DEIS would benefit greatly by having the Table of Contents include descriptive titles for each chapter. For instance, rather than simply listing “Chapter 3.14,” it would be more user-friendly to label it as “Chapter 3.14 Surface Waters and Wetlands,” which would greatly improve navigation for readers seeking specific information. This deficiency made the review challenging to both navigate and reference. Lacking such references, the substantive analysis is particularly difficult and time-consuming, as the basis of all factual statements and assumptions upon which the DoD has determined impacts will be ‘less than significant’, cannot be accessed by the general public. As prior comments on DoD DEISs have noted, accessible hyperlinked references are standard and should be made available to reviewers. Instead, this document does not provide accessible data and frequently appears to reference internal communications which are also not possible to scrutinize. To remedy this, a revised DEIS should provide all information that is public and cited, and omit internal communications that cannot be assessed.

Procedurally, a public meeting is understood to include a general forum allowing for open information exchange and discussion. The DoD’s “public meetings” in the CNMI, failed to provide a true open exchange with presentations, and a subsequent question and answer (Q&A) period. Instead, the public was provided with a poster session and a ‘Welcome Address’. The public was

then corralled into a space separate from others where they would be videoed while presenting their oral comments. This sort of interaction is intimidating and not culturally appropriate for our island communities and certainly does not result in a *substantive* engagement with the public.

37C | An open Q&A session with all those present engaged in the conversation was not only lacking, it stymied a true public forum. Meaningful protocols should have been used by DoD to ensure stakeholders would speak freely and be heard by using more traditional and open island communication methods. This includes allowing *untimed* comments by participants, and translating information, questions, and comments into Chamorro and Carolinian - official languages of the CNMI - as well as other languages used by our very diverse population.

While the fact sheets offered high-level summaries of the topics reviewed, they did not include “significance” criteria or provide supporting references and data regarding the analysis provided. Therefore, this DEIS failed to meaningfully inform decision-making, evaluate alternatives to allow for a comprehensive comparison of proposed actions, facilitate public and agency involvement, or ultimately, disclose the myriad potential direct, indirect, and cumulative effects of this proposed action.

### **Procedural Comments**

The DEIS materials were not properly published, as key supporting appendices, including PDF files, were unavailable for review at the time that the public comment period began. The appendices were only made accessible in the weeks that followed the release of the DEIS. This lack of access prevents a thorough and transparent public review of the full document and associated analyses within the original timeline, and did not allow for sufficient time for review and inclusion of comments relevant to these extensive additional files. Therefore, the comment period should be extended for time lost in reviewing these pertinent details.

37D | The analysis of alternatives does not sufficiently explore options for alternative infrastructure development and fails to address community scoping concerns related to sustainable land and water resource use, particularly regarding solid and hazardous waste management.

The document is unclear and potentially misleading, proposing acquisition of land use rights on Saipan that are not currently granted, while repeatedly stating that no actions on Saipan are included in the proposal, yet describing a “leapfrog movement with each subsequent advance, these detachments secure more island footholds” (Page 1-4).

Several referenced plans and assessments, such as those for fire management, range management, solid waste and recycling contracts for waste removal, and mitigation measures, are still pending and thus cannot be adequately evaluated at this time.

37C | The timing of the DEIS publication, coinciding with the Mariana Islands Training and Testing (MITT) Environmental Impact Statement (EIS) review, places an undue burden on both reviewers

37C | and the CNMI community, who would benefit from an extended review period to ensure meaningful participation in both.

Furthermore, the DoD is widely recognized as one of the largest institutional emitters of greenhouse gases, producing both significant greenhouse gas emissions and hazardous waste through its extensive operations and massive base footprint worldwide. See, for example, Watson Institute’s report (see References) entitled [Pentagon Fuel Use, Climate Change, and the Costs of War | Watson School of International and Public Affairs](#) and [Al Jazeera](#) as well as the recent International Court of Justice’s recent advisory opinion regarding climate change in which Judge Cleveland’s separate opinion on armed conflict and emissions makes clear the role of militarization in accelerating negative consequences of climate change <https://www.icj-cij.org/sites/default/files/case-related/187/187-20250723-adv-01-10-en.pdf> Thus, any effort to address climate change, biodiversity loss, or land degradation that does not confront militarization is fundamentally incomplete.

37O | Given this considerable environmental footprint, it is essential that this DEIS fully acknowledge the DoD’s role as a major polluter and uphold the highest standards of environmental analysis, disclosure, and mitigation. Noting that the CNMI has recently published a Climate Action Plan with commitments to reduce emissions at government facilities, it is inconsistent to write-off emissions associated with this proposal as “less than significant”. To ensure meaningful analysis and public awareness regarding the scope of this action, this DEIS must include comprehensive assessments of cumulative impacts from all DoD activities, both locally and globally, to ensure potential adverse effects on public health, ecosystems, and climate are transparently addressed and minimized in accordance with the NEPA requirements. Failure to do so represents a procedural deficiency and undermines the adequacy of the environmental review. We request this significant shortcoming be remedied through full disclosure, robust analysis, and meaningful efforts to avoid, minimize, and mitigate direct, indirect, and cumulative impacts of this and concurrent proposals in order to support peace and genuine security in our region, throughout the Pacific, and for our world.

37A |

## **Substantive Comments**

### ***General Substantive Comments***

37E | Throughout this DEIS, conclusory statements are made regarding the significance of impacts without any context or terms of reference that enable meaningful review. What criteria or matrices were used to assess the significance of potential direct, indirect, and cumulative impacts resulting from the proposed activities? The DEIS does not provide a clear methodology demonstrating that the DoD conducted a thorough and scientifically rigorous evaluation before

37E | determining the significance of these impacts. As such, the analysis and the DoD’s conclusions appear anecdotal and lack defensible grounding in accepted scientific standards.

37N | The detailed comments that follow can be summarized by an overarching concern for lack of substance, depth, context, and breadth which frustrate meaningful analysis of and efforts to avoid, minimize, and mitigate the impacts of this proposal. For example, questions remain regarding water use and demand; the island’s carrying capacity is currently unknown, leaving a critical gap in understanding how these activities may affect local water resources. Applying the internationally accepted precautionary principle, no use of explosive ordnance should be permitted until a comprehensive hydrological study of Tinian’s aquifers, watersheds, and freshwater resources, including current and projected demands for all uses, is completed. In the absence of such a study, and without access to supporting analyses or data referenced in the DEIS, it is impossible to adequately assess the potential significance and scope of impacts to freshwater and coastal systems and related infrastructure based on the information provided.

According to USAFacts (<https://usafacts.org>), in 2024 US defense spending exceeded the combined spending of the next nine highest-spending countries in the world. As one of the most highly funded militaries in the world, it is critical that meaningful environmental analysis be conducted. This is necessary for DoD to meet its mandates and ensure the health, well-being, and security of the CNMI and its environment, and not be undermined by inadequate analysis. The questions and comments that follow aim to improve the outcomes of this and future proposals for activities in the CNMI and throughout the region.

### ***Specific Substantive Comments / Questions from DEIS Review***

## **1 PURPOSE AND NEED FOR PROPOSED ACTION**

### *1.1 Introduction*

#### **Page 1-4**

“Each ‘island position’ would successively serve as a launching point to obtain a foothold on the next island in a ‘leapfrog movement.’ With each subsequent advance, these detachments secure more island footholds, threatening an opponent’s freedom of movement along key sea and air lanes, and providing the time needed to assemble a larger task force for a broader response. The distributed operations training on Tinian, described further in Chapter 2, would be representative of such an initial ‘island position’.”

37A | This observation raises significant concerns regarding the DoD approach to military expansion in the Marianas archipelago, particularly in terms of transparency, public engagement, and the adequacy of environmental review. By not addressing the potential for expanding training onto additional islands within the archipelago during public meetings, the DoD is circumventing the

37A

critical process of open dialogue with affected communities and stakeholders. This omission suggests that the current DEIS may represent only the initial phase of a broader, incremental strategy aimed at expanding military control over the region's lands, waters, and airspace, without fully acknowledging or disclosing the cumulative impacts of such expansions.

This piecemeal approach to environmental and community consultation raises concerns about the thoroughness and transparency of the planning process. *It also suggests that the DoD may be relying on successive, smaller-scale DEISs to avoid a comprehensive, region-wide impact analysis.* The failure to incorporate the possibility of future expansions into the current DEIS hinders the ability of the public and decision-makers to fully understand the long-term, cumulative effects of these military activities on the ecosystem, local populations, and cultural heritage.

Such incremental expansion without adequate public scrutiny could result in the gradual degradation of natural resources, disruption of local livelihoods, and the erosion of cultural practices, especially for Indigenous communities who have deep historical and cultural ties to these lands and waters. Furthermore, by taking a narrow view of the proposed actions and omitting discussions about broader, long-term plans, the DoD risks minimizing the cumulative environmental impacts of its operations, which may result in irreversible ecological damage and social displacement over time.

For a truly comprehensive and transparent decision-making process, it is essential that the DoD incorporate the potential for future expansions within the current DEIS, ensuring that all foreseeable environmental, social, and cultural impacts are fully assessed from the outset. A failure to do so risks undermining public trust and eroding opportunities for meaningful public input on decisions that will have lasting consequences for the Mariana archipelago and its people.

## 1.2 Purpose and Need

### Page 1-5

“To leverage the capabilities of modern technology, the USMC would create instrumented training within the Military Lease Area, integrating physical and virtual training, to replicate possible combat scenarios and teach particular skills and techniques. This would allow U.S. Armed Forces and allied forces to rapidly adapt to changing battlefield conditions in an island environment and build experience without the time and cost of an exclusively live exercise.”

37D

The DEIS fails to sufficiently justify the strategic necessity of concentrating large-scale, long-duration military training exercises within the limited land area of the Mariana Islands. Virtual training technologies which are already widely used by the DoD can be conducted anywhere and offer flexible, lower-impact alternatives to live exercises, especially in environmentally and culturally sensitive areas that are irreplaceable and sacred to Indigenous communities.

Moreover, the DEIS does not adequately explain why an “island environment” is essential to preparing for conflict with major geopolitical rivals such as China and Russia, both of which are continental powers. If the rationale is tied to force projection in the Indo-Pacific region, this should be supported with detailed strategic analysis and consideration of alternative locations with similar access.

37P

Importantly, concentrating extensive military activity on an island with a small land mass and relatively remote location raises serious security concerns. Such a build-up may inadvertently make the Marianas a high-value target for foreign adversaries in the event of rising tensions or conflict. The DEIS should address this vulnerability. Included in the assessment of the vulnerability should be plans to support civilian protection/shelter in the event of a strike to the islands. There is currently no infrastructure in place for these kinds of protections.

In sum, the DoD has not provided clear, evidence-based justification for why this specific geographic area must absorb the cumulative impacts of such concentrated training activity. This omission undermines the adequacy of the EIS under NEPA and calls for further analysis of reasonable alternatives and distributed training scenarios.

“in-water training occurring seaward from the high water mark on Tinian within the Mariana Islands Range Complex, would continue to be addressed in the MITT EIS/OEISs.”

A hyperlink to the specific in-water exercises discussed in the MITT should have been used here to make it easier for reviewers to understand what will occur and how the DoD will address potential adverse impacts from such activities. If troop activities covered by the revised MITT, will include use of the facilities to be built under this proposal, such direct, indirect, and cumulative impacts should also be assessed in this DEIS.

Additionally, releasing two large seemingly interconnected DEISs separately, with concurrent public notice and comment periods is overwhelming. It has created an undue hurdle for reviewers, and works to impede the intent of NEPA to take a “hard look” at interconnected activities, public understanding of federal proposals, and ensure significant impacts of actions are avoided, minimized, and then mitigated.

“What makes the CNMI, and Tinian in particular, unique and valuable as a training area is its location as a U.S. Commonwealth within the Western Pacific, and its natural coastline, dense vegetation, and rugged terrain, all of which are representative of areas where U.S. Armed Forces and their allies and partners could deploy throughout the Pacific and Asia.”

If Tinian is valued as a training ground for its rugged terrain and dense vegetation in verisimilitude to its Western Pacific neighbors, we would like to point out that the even temperature throughout the year in the Marianas does not compare to the mountainous landscape and variable temperatures found throughout East Asia. The unique climate of the CNMI offers a single

weather pattern for combat training, which has limited relevance to likely combat conditions arising from current geopolitical conditions.

#### **Page 1-6**

“training on Tinian would allow the USMC to develop and preserve critical capabilities for protecting and defending the U.S. and the Marianas,”

This statement warrants careful reflection. This framing suggests that the Marianas is inherently vulnerable and in need of military protection while ignoring the political subordination of Guam. Yet historically, our islands have existed peacefully in the region, including in close proximity to China, without the presence of large-scale military infrastructure or operations. There has been no demonstrated threat to our security that justifies such a significant increase in military activity at this intensive scale.

Moreover, residents of the Marianas have welcomed visitors from across Asia, including China, for many years. These relationships have been largely peaceful, rooted in cultural exchange, tourism, and mutual respect. The assertion that a military buildup is necessary to protect this region seems to discount the lived experience of its people and the relative stability we have long maintained.

What many in the community interpret from this proposal is that our islands are being positioned as a strategic launch point for operations in broader regional conflicts, effectively becoming a front line of defense for the continental United States. This raises a difficult but important question: Are US Territories being asked to shoulder disproportionate risk in the name of national defense? The perception is growing that the safety and well-being of residents in the Marianas are being treated as secondary to strategic military interests.

As U.S. citizens and as the home to Indigenous Peoples, the people of the Marianas deserve the same level of consideration, consultation, and protection as those living in the fifty states. Any defense strategy that significantly affects our lands, waters, and way of life should be built on genuine partnership, mutual respect, and a clear recognition of the values and voices of local communities.

#### *1.4.1 2015 Draft EIS/OEIS NEPA Process*

#### **Page 1-8**

“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, CNMI Joint Military Training EIS Chapter 1 June 2025 Revised Draft Purpose and Need 1-9

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.”

Public comments in the past questioned the need for live-fire training in Tinian given the safety and other advantages of using virtual simulation, and given the proximity to Guam, and other US locations with ranges. Why is it necessary to create another live-fire or explosive training ground on such limited land? This ultimately leads to further pollution, harm to flora and fauna, endangered species, and the peaceful environment currently enjoyed by the residents of the Marianas and their visitors.

37F

The DEIS lacks any discussion of acute or long term emotional and/or psychological trauma that may occur due to exposure to the presence of military personnel carrying weapons within the community, day and night live-fire, and explosions. This is not only true for the adult population, but more importantly for children during their early development.

Over 28,000 comments were received in the 2015 DEIS proposal 2,748 were deemed unique and critical of military plans of action yet the criticisms were not adequately addressed.

Revisions to the plan, including power poles to address power issues do not begin to address the kind of destruction these exercises will bring.

Not allowing public access to any of the planned areas makes it difficult to assess the activities, construction, and waste management in the Northern half of Tinian.

### 1.5.2 *Airspace and Aviation*

#### **Page 1-11**

“The USMC and Commonwealth Ports Authority would site needed infrastructure on TNI, coordinate access arrangements, and deconflict air operations to ensure continuing and uninterrupted civil aviation activity. The USMC intends to discuss its proposed airspace safety protocol for the Multi-Purpose Maneuver Range and Explosives Training Range with the FAA, which is a cooperating agency for this Proposed Action. The FAA would advise USMC whether there is a need to establish a controlled firing area airspace designation over either or both proposed live-fire ranges in the Military Lease Area.”

The CNMI relies largely on tourism as its primary economic driver. Any significant disruption to even the perception or reality of the islands as a peaceful, relaxing destination directly threatens the economic well-being of our communities. The proposed shared use of airspace with military operations risks exacerbating impacts to an already fragile tourism sector that has yet to fully recover from recent global and regional challenges.

Tourists, whether honeymooners, families, or those simply seeking rest and relaxation, choose the Marianas because of the tranquility and natural beauty of the islands. The visible presence of combat-ready military personnel, weapons, and tactical equipment, along with the routine operation of military aircraft, undermines this experience. The image of armed soldiers walking through civilian spaces or the sight and sound of military aircraft overhead upon arrival at the airport creates an atmosphere of tension rather than hospitality.

The deterrent effect on tourism should not be underestimated. Potential visitors seeking an escape from stress are unlikely to choose a destination where military activity is highly visible and where the civilian airspace is shared with military operations. For the people of the CNMI, this is not just a matter of aesthetics, it is a question of economic survival. A defense strategy that compromises the only viable industry in the region must be reconsidered in light of its long-term impacts on livelihoods, community stability, and regional development.

## 2 PROPOSED ACTION AND ALTERNATIVES

### Page 2-2

#### *Figure 2.1-1 Military Lease Area with Proposed Action Features*

The figure has left out important resource features for the island, e.g., wetlands, streams, cultural resources, native habitats etc. These are relevant for readers to assess potential pollution impacts and should be identified consistently throughout the DEIS and in the update report or final EIS.

### Page 2-3

What type of ammunition will be held in the holding area and for what length of time? What is an AM2 matting surface? Please spell out each acronym when it first appears in text.

37Q

For the purpose of assessing environmental impacts, it would seem relevant to note what type of nonskid coating would be used on the AM2 matting surface. It appears that epoxy is the traditional coating, and if this is the material being proposed here, this may raise additional concerns regarding maintenance especially in our hot, corrosive environment. Even under normal conditions, these AM2 matting must be removed and resurfaced which can have environmental impacts which are not assessed. It also appears other more environmentally friendly coatings as well as other materials such as lightweight magnesium alloys and phase-transforming cellular materials, are available. These are increasingly considered industry standards that potentially offer lighter and more sustainable alternatives to the current AM2 material. Please explain why AM2 was selected, what type of coatings are proposed, the

37Q | frequency of maintenance, and the associated waste disposal and resource demands. Please provide additional context in this section for an appropriate review.

**Page 2-4**

“Within the Military Lease Area, certain portions would be designated as no training areas (Figure 2.1-3). These no training areas include the former Tinian Mortar range,”

37D

Why would DoD refrain from using the Tinian Mortar range? Perhaps this is due to how the area surrounding Unai Chiget has already been so adversely impacted from previous exercises that no access has been granted to the general public until late 2022 when a narrow corridor was cleared of unexploded ordnance (UXO). This beach area has unique cultural sites near the shoreline including ancient petroglyphs. Therefore, not only is it illogical to keep using this site as a mortar range, but there is also no logic that would support using other sites on such a small land mass for Mortar ranges or more firing ranges. No action is the only logical recourse. These exercises can be carried out in existing ranges in the area. New sites are not necessary for meeting DoD’s stated “need”. Please detail how the proposed range sites were identified and why existing and already impacted sites were not selected.

*Figure 2.1.3 Existing and Proposed No Training Areas within the Military Lease Area*

**Page 2-6**

Figure 2.1-3 again lacks pertinent resource information for reviewers’ assessment, e.g., streams, wetlands, and proposed infrastructure improvements.

**Page 2-7**

“After completion of training, each unit would be responsible for cleaning all vehicles and gear in accordance with biosecurity requirements in designated areas as discussed in Section 2.1.9.2, and ensuring the training area and ranges are in “left as found” condition. Personnel and equipment would arrive and depart for training through three possible locations: (1) Francisco Manglona Borja / Tinian International Airport (TNI), (2) Honorable Jose Pangelinan San Nicolas Commercial Port of Tinian (Port of Tinian), or (3) North Field.

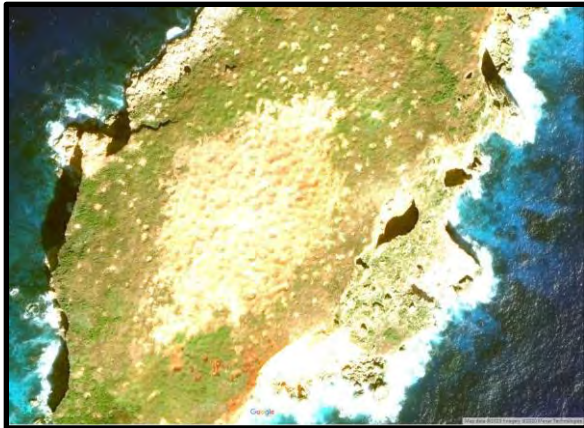
Small, medium, and large training events may overlap, with up to 1,000 service members participating in training on Tinian at any one time. Because training units need opportunities to operate in darkness and low-light conditions, training events could extend over a 24-hour period.”

37R

Even limited usage of live-fire training conducted at any 24-hour period by 1,000 soldiers would wreak major havoc not only on the endangered species but the people of Tinian and Saipan. It is

37R

unclear how these activities will be managed to avoid impacts to residents and tourists, let alone how ranges which may be used 24/7 could be cleared of munitions and related debris from these activities. Will the DoD establish monitoring mechanisms and bonds to ensure financing is available to achieve complete clean-up of these sites for the duration of these proposed activities? What assurances will be in place to ensure the proposed training areas and ranges will be “left as found”?



One need only refer to images of the detonation pits and debris on Farallon de Medinilla’s as an indication of how severe the environmental impacts will be. A clearer predetermined cleanup

and management plan is needed for the community to feel confident that our islands will be returned to “as found”, and not simply “left”.

#### Page 2-7 through 2-8

“Visitors to the Military Lease Area may see service members in vehicles or on foot equipped with weapons to be used in non-live-fire training activities anywhere in the Military Lease Area.4”

37F

The DEIS does not adequately address the rationale for having service members carry weapons during non-live-fire training exercises, particularly in civilian-accessible areas. If no live-fire is occurring, the need for visibly armed soldiers (even without ammunition) should be explicitly justified in the context of both operational requirements and community impacts.

The visual presence of weapons, even unloaded, have a significant psychological effect on local residents and visitors, especially on an island that promotes itself as a peaceful and serene destination. The deployment of uniformed soldiers carrying firearms in public or recreational areas undermines the sense of safety and tranquility that is essential for the tourism economy and the quality of life for residents.

37F

The DEIS must fully assess the sociocultural and economic impacts of this visible militarization of the island environment, particularly as it pertains to public perception, community well-being, and tourism-dependent businesses. If such practices are not operationally necessary for non-live-fire training, they should be minimized or restricted to areas not visible to the public. The current lack of analysis on this matter constitutes a gap in the impact assessment and should be addressed through further clarification and possible mitigation measures.

“large-scale joint exercise with multiple U.S. Armed Forces participating over a longer period (e.g., up to four weeks).”

The DEIS inadequately addresses the significant and cumulative impacts that repeated, large-scale military training exercises will have on the emotional, mental, and environmental well-being of Tinian and neighboring island communities.

37S

The proposed month-long training exercises, conducted two to four times per year, involving up to 1,000 service members and multiple armed forces branches, is excessive in both scale and frequency. Such sustained military activity, especially when conducted at night, poses serious risks to the mental and emotional health of Tinian residents. Sleep disruption caused by nighttime operations would particularly impact vulnerable populations, including school children, adolescents, the elderly, and individuals suffering from post-traumatic stress disorder (PTSD), many of whom are the islands' military veterans.

The DEIS fails to address whether the DoD will provide adequate mental health services for affected residents during and after these extended exercises. Without such support, the community is left to bear the psychological burden of operations that serve national security interests but extract local human costs.

Furthermore, the proposed activities have broader geopolitical and regional implications. The presence of large-scale, frequent military operations in the Northern Mariana Islands may provoke heightened tensions with regional powers and contribute to militarization of the Indo-Pacific, yet the DEIS does not adequately consider these potential diplomatic consequences.

37S

Residents and tourists on Saipan, especially in the South will also be impacted by aircraft noise and visibility of operations, which may affect both the tourism industry and public perception of regional stability.

37G

Lastly, the exercises will result in environmental harm that is not sufficiently analyzed in the DEIS. Repeated disturbance of natural habitats could interfere with native wildlife mating patterns and migration cycles. Domesticated cattle, which are essential to the island's local economy and cultural practices, are also likely to be adversely affected by noise and activity stressors.

The proposed exercises are too frequent, too prolonged, and too large in scale. The DEIS fails to fully assess the cumulative psychological, social, ecological, and geopolitical impacts. These deficiencies should be addressed through additional analysis, alternative training proposals with reduced intensity, and clearly defined mitigation measures, including community mental health support.

### 2.1.3 *Ground Training*

**Page 2-8**

“Ground training events on Tinian would be conducted throughout the Military Lease Area including the two new live-fire training ranges, at North Field, and along roads or other previously disturbed access paths.”

Why are new live-fire training ranges being created when the existing Tinian Mortar Range at Unai Chiget has been cut off from public use for years due to UXO? This is indefensible given the small size of Tinian’s land mass. DoD does not *need* to carry out explosive training or live-fire on Tinian when other existing ranges are already in use. It is illogical to continue to pollute new areas with munitions only to have to add another site for DoD remediation.

#### 2.1.4 Aviation Training

##### Page 2-10

37N

The DEIS lacks sufficient detail and analysis regarding the use, location, and management of temporary fuel containment systems proposed for training activities in the Northern Mariana Islands. Key information is missing on whether these fuel storage systems will be stationed at fixed locations to reduce the geographic area at risk of spills, or if they will be mobile and relocated throughout training operations, potentially increasing exposure to sensitive areas.

Fixed containment systems may offer a more manageable and monitorable footprint, reducing the risk of accidental releases across a wider area. If the systems are mobile, the DEIS must clearly identify protocols to minimize environmental risk at each new site. The potential for spills in remote or environmentally sensitive areas, such as near wetlands, coastal zones, or traditional farming areas, poses a serious concern that has not been fully addressed.

The DEIS should specify:

- Exact or approximate proposed locations of fuel containment systems.
- Whether those locations are recurring or flexible during exercises.
- The type and volume of fuels stored.
- Protective measures such as secondary containment, leak detection systems, and spill-prevention planning.

Furthermore, the DEIS provides insufficient information on emergency response preparedness. For example, if a spill occurs during a storm event or in a remote training area with limited access, what protocols and response times can be realistically expected? What equipment and personnel will be on standby, and what is the process for notifying local authorities and the public?

Given the DoD’s documented history of inadequate environmental remediation efforts, including long-standing contamination at other military facilities such as Red Hill in Hawai’i, Kaho’olawe, and the former Naval Air Station in Vieques, Puerto Rico, additional assurances, planning

transparency, and third-party oversight are essential. These past failures highlight the importance of thorough analysis, proactive prevention, and real-time response capacity.

To avoid significant and lasting impacts on Tinian's environment, economy, and residents, the final EIS must include:

- A clear fuel management plan.
- Detailed monitoring and spill response procedures.
- Consideration of cumulative risks.
- Meaningful public involvement and disclosure when accidents or releases occur.

Absent this level of specificity and commitment, the project risks repeating avoidable mistakes that would undermine both environmental protection and the DoD's own readiness objectives.

#### 2.1.5.2 Explosives Training Range

##### Page 2-16

- Minimize potential noise impacts to the Mariana fruit bat.
- Minimize potential impacts to culturally sensitive areas, including the North Field National Historic Landmark.

How will these goals be achieved in a realistic and timely manner?

The DEIS fails to adequately assess the real-world impacts of live-fire exercises and explosive detonations on both human communities and endangered species. The suggestion that impacts can be mitigated simply by installing gates and limiting public access to training areas does not address the broader, island-wide consequences of these activities.

37S

Tinian is a small island, and the sound and vibration from explosive detonations will not remain confined to the designated training area. These disturbances are likely to be experienced across the island and even in parts of neighboring Saipan. Such impacts pose a serious threat to the physical and psychological well-being of residents, including children, elders, and individuals with PTSD, many of whom are veterans. The persistent presence of explosions and military activity will also affect native wildlife and endangered species, which are highly sensitive to noise and habitat disruption, an issue insufficiently explored in the DEIS.

Additionally, the DEIS makes unsubstantiated claims that the proposed activities will bring economic opportunities to the people of Tinian. In reality, transforming Tinian into a known site for live-fire ranges and frequent military detonations is likely to harm, rather than help, the local economy. Tourism, one of the few viable industries on Tinian and Saipan, depends on the islands' reputation as peaceful, scenic, and culturally rich destinations. Increased militarization, visible

armed presence, and the auditory disruptions from explosions are likely to deter both tourists and potential investors, further diminishing an already fragile tourism industry.

37K

In this context, the claim of economic benefit appears both speculative and unsupported by specific analysis in the DEIS. A more balanced and comprehensive assessment is needed, one that considers not just the potential influx of military-related spending, but also the long-term economic losses associated with degraded tourism, decreased public confidence, and environmental degradation.

Without clearer justification, a detailed economic cost-benefit analysis, and more robust mitigation measures, the project risks causing irreparable harm to Tinian's identity, environment, and economic future.

**Page 2-20**

*Figure 2.1-8*

As previously stated, wetlands, streams, limestone forests, habitats and culturally significant areas should be added to the Figures.

**Page 2-21**

"The USMC intends to discuss its proposed airspace safety protocol for the Multi-Purpose Maneuver Range and Explosives Training Range with the FAA, which is a cooperating agency for this Proposed Action."

Why has a DEIS been released for public comment before the Federal Aviation Administration (FAA) completed their assessment and/or need for an airspace safety protocol? The comment period should have begun after the FAA had completed this discussion with DoD.

**Page 2-22**

*Figure 2.1-9*

Will ammunition be fired towards the ocean? Or will firing be directed and meant to be contained within the Multi-Purpose Maneuver Range?

How will range management be conducted to ensure that training areas and range will be "left as found"? (Page 2-7)

*2.1.8.4 Environmental Management of the Military Lease Area*

**Page 2-28**

“The USMC will continue to support initiatives by Joint Region Marianas to reduce or eliminate pollution. Example programs include Recycling Programs for spent brass, aluminum cans, cardboard, etc.”

The assertion that the USMC has “environmental management in place” does not, in itself, constitute evidence that meaningful environmental protection is being carried out. Stating that a system exists is not equivalent to demonstrating its effectiveness. This is particularly concerning given the nature of the proposed activities, simulating war-like scenarios involving live-fire exercises and extensive ground movement, on an ecologically and culturally sensitive island.

It must be asked: in what armed conflict are environmental and cultural preservation part of the operational scenario? The very nature of the training assumes environmental degradation as a necessary byproduct of readiness. Yet Tinian is not an expendable battlefield; it is a living community with protected species, cultural heritage sites, and a fragile ecosystem. To detonate ordnance and stage maneuvers that could involve as few as 40 and as many as 4,000 troops annually on this sacred land is a disproportionate cost, especially when the USMC already has access to other secure facilities with similar environmental conditions for training purposes (e.g., ranges in Hawaii, California, or Australia).

37H

In addition to environmental concerns, the DEIS fails to address solid waste and recycling infrastructure impacts. The DoD has not clarified whether it will be responsible for removing recycled materials off-island to avoid overwhelming Tinian’s only recycling center. There is no indication in the DEIS of what recycling or solid waste management contracts are in place, or how waste will be managed during multi-week, large-scale exercises.

This is not a new issue. These same concerns were raised in agency comments during the 2015 DEIS review process, yet no substantive action appears to have been taken to develop or implement a recycling or solid waste plan prior to the release of the 2025 DEIS. The lack of progress in a decade raises serious questions about the Department’s commitment to environmental stewardship and its responsiveness to local and interagency input.

The Final EIS must:

- Include clear documentation of existing or planned recycling and solid waste contracts.
- Commit to removing recyclable materials off-island unless local facilities confirm capacity.
- Provide evidence of actual, not just theoretical, environmental protection measures.
- Justify why alternative, already-established training sites cannot meet readiness objectives without sacrificing Tinian’s land, culture, and environment.

Without these steps, the DEIS does not satisfy the standards of thorough analysis, public accountability, or environmental responsibility required under NEPA.

“Finally, a Wildland Fire Management Plan would be developed for the Military Lease Area Range Complex.”

37I

It is deeply concerning that the DEIS has been released for public review and comment without a completed and publicly available Wildland Fire Management Plan. Given the known risk of wildland fires associated with live-fire training and other military activities, particularly in island environments with limited firefighting resources, the absence of this critical plan undermines the public’s ability to meaningfully evaluate the project’s environmental impacts.

The Wildland Fire Management Plan is a key component of the proposed action’s risk mitigation framework. Without access to this plan, the public cannot assess how fire risks will be prevented, contained, or mitigated; how emergency response will be coordinated; or how potential impacts to human safety, ecological resources, and cultural sites will be addressed. Releasing the DEIS without this foundational document fails to meet NEPA’s standards for informed public participation and comprehensive impact assessment.

Therefore, the public comment period should not proceed until the Wildland Fire Management Plan has been fully developed, made available for review, and incorporated into the DEIS. At a minimum, the comment period must be extended to allow stakeholders and the public adequate time to evaluate and respond to the Plan once it is released.

#### Page 2-29

“Other facilities and services at the Base Camp would include tent pads that could accommodate 500 personnel during training events, restroom facilities, and an ammunition holding area to be used while training is occurring (AHA 2, as described in Section 2.1.7), biosecurity facilities, utilities (electrical power, potable water, wastewater, sewage treatment), and fuel storage.”

37N

While the DEIS notes that storage tanks will be included in the infrastructure developed under both alternatives, the size and relevant regulatory details of the proposed storage tank do not appear to be detailed in this DEIS. Particularly noting the failure of monitoring and safety mechanisms in the wake of the recent Red Hill disaster on Oahu, and noting any contamination of Tinian’s sole-source aquifer could significantly imperil the drinking water supply of residents and visitors alike. What avoidance, minimization, and mitigation measures will be implemented to ensure ground water supplies will not be impacted by this proposed use? Please detail what best management practices regarding fuel storage and monitoring will be put in place.

What type of wastewater and sewage treatment will be undertaken?

Will this include making infrastructure improvements for the entire island of Tinian?

If underground lines are being run from the DoD’s base to the Commonwealth Utility Corporation (CUC), what is the land area and potential impact of this activity? Noting the small size and limited

funding to run Tinian's lone green waste station, and address the increasing threats of invasive species such as Coconut Rhinoceros Beetle, wildfires, and related hazards, how will green waste from this activity be managed?

**Page 2-30**

"A new potable water system supplied by up to four new or rehabilitated groundwater wells with a storage tank within the Military Lease Area."

Where are the groundwater wells located? CNMI groundwater belongs to the public. Public Law 06-12 mandates that all ground water is the property of the people of the CNMI. How will proposed diversions comply with CNMI requirements and ensure sustainable use?

PUBLIC LAW NO. 6-12  
Senate Bill No. 6-102, S.D.1, H.D.3

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1           Section 3. Statement of Authority. The groundwater resources of  
2           the Commonwealth belong to the public. No diversion, withdrawal,  
3           storage, or use of such water shall occur except in the compliance with  
4           this Act and with other laws of the Commonwealth.

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No data is provided to support analysis regarding groundwater carrying capacity. What is the anticipated annual demand? What is the relative proportion to current and projected use for the residents of Tinian and its environmentally sensitive ecosystems? Additional analysis here regarding how any increased use of groundwater is sustainable and a "less than significant" impact should be provided.

During times of drought even "private" water wells may be co-opted by CUC to provide water to island residents. DoD states that the rehabilitated wells will have no connection to CUC. This appears to go directly against said public law.

It seems that DoD has no intention of working with the CNMI government to create a duly beneficial EPA approved wastewater treatment system for the base camp and Tinian residents. However, DoD expects to have CUC's electrical utility and communications infrastructure support the Base camp.

This one-sided cost on the part of DoD shows how little concern there is for providing justly deserved benefits to the Tinian population in the way of upgraded infrastructure for all. Given that Tinian has a population of just over 2,000 people (2,044), DoD adding an additional 1,000 service members (50% increase in population up to four times a year) who will be using ground

water, and contributing to solid waste and wastewater, it seems incomprehensible that a portion of the \$50 billion dollars appropriated for Guam and the region could not be used to benefit the people of the CNMI (<https://www.youtube.com/watch?v=yT2r3BKnZQo>).

The CNMI government, environmental agencies and the public have again and again provided comments to DoD requesting that an EPA approved wastewater treatment plant, upgraded water treatment facility and a landfill with recycling centers be established on Tinian as part of the CJMT. The costs of the CJMT to Tinian should be balanced with benefits to the island environment, especially given DoD's self-proclaimed environmental stewardship mandate. The proof is in its actions.

### **Page 2-33**

"construction of Base Camp elements (e.g., tent pads), aircraft shelter at TIN, and Explosives Training Range. The number of construction workers required would fluctuate depending upon which facilities are constructed in any given year, with the largest number of construction workers anticipated at any one time being approximately 50."

Where will DoD recruit 50 construction workers? In general, there is a shortage of skilled workers in the CNMI. We suggest that DoD support technical skills training of the local population by contributing funding to the Northern Mariana College and the Northern Marianas Technical Institute to build up the local workforce and support the local economy.

### **Page 2-40**

"While the No Action Alternative would meet a portion of the non-live-fire training requirements of the U.S. Armed Forces, it would not meet the purpose of and need for the Proposed Action. *Specifically, this alternative would not support additional, needed training in the Western Pacific, including training in distributed operations. Consequently, forward-deployed U.S. Armed Forces would not be able to exercise evolving tactics, training, and procedures that would enable them to deter adversary aggression and respond to a threat to national security.*"

DoD failed to explain why this training, all of it, is needed in the Western Pacific, when this training could be conducted at any of the myriad bases located on US soil and abroad. Please provide further clarification why here, all at once, in one location. It seems that congregating so many actions and exercises in one very small land mass makes Tinian an ideal target for foreign aggression. Tinian, its indigenous people, culture, and existence, could easily be wiped off the map.

### **Page 2-43**

“The USMC would develop a solid waste management plan for military operations on Tinian within the Military Lease Area Range Complex and only dispose of waste from military operations in compliant landfills authorized to accept DoD waste.”

Please provide a list of compliant landfills within proximity to Tinian that may be able to accept DoD waste. Tinian does not have an EPA approved landfill, only an unlined dumpsite. The Saipan Landfill is already nearing capacity (Kuam News, May 2024. “CNMI Strives for Comprehensive Solid Waste Management”, May 2024. <https://www.kuam.com/story/50753285/cnmi-strives-for-comprehensive-solid-waste-management>).

This concern was raised by the CNMI government in their 2015 CJMT EIS comments and still does not appear to have been addressed. Lacking a nearby solution, any additional waste to these systems seems to present a risk of significant impact to people and the environment.

#### 2.4.3.1 Foreign Training Ranges in Japan and Korea

#### Page 2-44

“U.S. Armed Forces currently train at Allied nation ranges in the Western Pacific, specifically ranges located in Japan and Korea. *These Allied nation ranges have some, but not all, of the capabilities* necessary to meet the Proposed Action military training requirements.”

The DEIS fails to provide a clear and evidence-based explanation as to why all proposed training exercises must be conducted exclusively in the Mariana Islands. While the document repeatedly references the Marianas’ “forward” position as a strategic asset, it does not explain why this geographic advantage is essential for training, as opposed to real-world deployment or operational staging in the event of foreign aggression or armed conflict.

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Training exercises do not inherently require a forward-deployed location. Numerous DoD installations across the continental United States and allied nations already possess suitable infrastructure, airspace, ranges, and environmental conditions to support a wide range of military training objectives. The DEIS does not specify what specific training capabilities are lacking elsewhere, or why those capabilities cannot be developed, supplemented, or shared among existing sites. Indeed, upgrading existing training sites is much less costly than creating new sites.

Furthermore, the DEIS lacks a comparative analysis of alternative training locations that might distribute environmental, social, and cultural impacts more equitably. This omission is particularly concerning given the cumulative and concentrated burden the proposed activities would place on the limited land and fragile ecosystems of the Mariana Islands, especially on Tinian.

If the DoD believes that certain training objectives can only be met in the Marianas, the DEIS must explicitly:

- Identify which training capabilities are missing at other installations;
- Justify why they cannot be replicated or approximated elsewhere;
- Explain how the Marianas' location is critical for *training* (not just future operational use);
- Provide a full alternatives analysis in compliance with NEPA requirements.

Absent this explanation, the justification for concentrating such intensive and disruptive training in the Marianas remains unconvincing and incomplete.

#### 2.4.3.4 Training Ranges on Guam

#### Page 2-45

“Second, even if the acquisition of additional land on Guam was possible, training on Tinian offers the opportunity to train in a comparatively more austere environment than offered on Guam. Developing additional ranges on Guam that would closely replicate the existing conditions on Tinian is not an efficient use of DoD resources or the limited land available on Guam. Third, this would focus DoD training ranges in one central location on Guam. This is inconsistent with the DoD desire for more dispersed CNMI Joint Military Training EIS Chapter 2 June 2025 Revised Draft Proposed Action and Alternatives 2-46 operations throughout the Western Pacific region.”

37D

The DEIS does not provide a compelling or transparent rationale for the selection of Tinian over other available locations, such as Guam or other US installations, for large-scale military training activities. The document implies that Tinian was chosen due to its “austere” conditions, yet it fails to explain how these conditions differ meaningfully from Guam or other installations, which already hosts extensive U.S. military infrastructure and training grounds.

Describing Tinian as “austere” in the DEIS is a reductive characterization that ignores the deep cultural, historical, and ancestral significance of the island (and archipelago) to the Chamorro and Refaluwasch (Carolinian) peoples. Such language frames the island primarily in terms of its physical development or lack of infrastructure, rather than recognizing it as a living cultural landscape with enduring ties to Indigenous communities.

Tinian’s value is not measured by its population size or its degree of urbanization. It is a place of ancestral connection, sacred sites, and traditional practices that continue to shape the identity and well-being of the people who call it home. The use of “austere” as justification for large-scale military exercises erases this significance and suggests that land with fewer residents is more acceptable for destructive use, an assumption that is both ethically problematic and inconsistent with principles of environmental justice.

The Final EIS must correct this framing and meaningfully incorporate Indigenous perspectives on land stewardship, cultural heritage, and long-term impacts. The cultural importance of Tinian

should weigh as heavily in the site selection and impact assessment process as any logistical or operational consideration.

This raises the question: is the DoD selecting Tinian simply because it can, because the land is federally leased rather than fully owned, and because it is perceived as being outside of DoD's own backyard? If so, this approach reflects a concerning “not in my backyard” mentality that places disproportionate environmental, cultural, and psychological burdens on the people of Tinian while sparing already heavily used military lands such as those on Guam.

Furthermore, the DEIS suggests that Tinian’s undeveloped or “austere” condition makes it ideal for simulating operational environments. But this very characteristic should demand greater environmental protection, not exploitation. An austere, minimally disturbed landscape should be treated as ecologically and culturally valuable, worthy of preservation, not transformation into a live-fire training ground.

Finally, the DEIS does not address the moral and political implications of choosing land that is leased, and thus not permanently held by the DoD, for activities that will cause long-term or potentially irreversible impacts. If Guam land is seen as more valuable or difficult to sacrifice, does this mean the DoD considers leased land, and by extension, the communities connected to it, more expendable?

These are fundamental questions that go to the heart of fairness, environmental justice, and responsible federal stewardship. The Final EIS must provide a clearer explanation of site selection criteria and justify why the environmental and cultural integrity of Tinian is being subordinated to military convenience.

#### 2.4.3.5 *Training Ranges in Hawaii*

#### **Page 2-46**

The claim that training activities on Tinian will be scheduled to minimize disruption to air, water, and land stands in contradiction to the justification given for not selecting Hawai’i or California, namely, that those areas are not “forward” enough to preemptively engage threats in the Western Pacific. This raises a contradiction: if operations in Tinian are to be minimal in presence and effect, why is its geographic proximity strategically critical? The rationale appears inconsistent and raises concerns that the real reason for selecting Tinian is the perceived lack of political resistance and the historical marginalization of island communities.

Tinian, and the broader CNMI, have already endured over a century of militarization and colonial use, Spanish, German, Japanese, and American. The continued presence of UXO from previous military activities is physical proof of the long-term environmental and safety impacts of these

exercises. The use of Tinian to launch the only atomic weapons ever deployed in combat underscores the burden the island has historically carried.

To address this contradiction and ensure a just and transparent process, the Department of Defense must:

- Provide a detailed comparative analysis of alternative locations (including Hawaii and California) with a focus not only on strategic position but also environmental impact, cultural sensitivity, and community consent.
- Include a cumulative impact study in the DEIS that accounts for the legacy effects of past military use in the CNMI, including unexploded ordnance, contamination, and cultural disruption.
- Initiate a full and independent cultural impact assessment, in partnership with Indigenous Chamorro and Carolinian representatives, to evaluate the long-term implications of further militarization.
- Demonstrate informed consent from local communities through transparent public engagement and consultation, not just informational poster sessions, but a formal process of free, prior, and informed consent consistent with international norms.

Until these steps are taken, the decision to proceed with Tinian as the training site lacks a credible foundation and risks repeating historical patterns of exploitation.

### **3 EXISTING ENVIRONMENT**

#### *3.1 Public Access*

##### **Page 3-1**

“large training events like Valiant Shield (June 2024), which is held a few times per year for approximately four weeks.”

The proposed frequency of 2 to 4 times per year of long-term training events would virtually close off the northern half of Tinian and access to those pristine beaches and fishing locales by local and Indigenous people for a third of the year. This closure is not supportive of subsistence fishing or use for recreation by the local population or tourists, for which the economy is heavily reliant. This would be devastating to the local economy and to food security.

#### *3.2 Land Use and Recreation*

##### **Page 3-2**

“The youth camp area within the Military Lease Area is not currently being used as a youth camp.”

The DoD failed to explore or expand upon the reason that the ‘youth camp’ is not being used at this time. A youth camp is important for supporting the sharing of natural resources, cultural knowledge about flora and fauna, and the proper use for conserving environmentally important habitats for wild and native species. This matter should be reassessed. We suggest DoD consider opportunities for conservation education and other youth engagement and community engagement activities that support DoD’s mandates of enhancing military readiness while also building investment in communities to ensure peace and security for all.

**Page 3-4**

”Recreation sites frequented by both Tinian residents and visitors are located on the west side of the island and include Unai Leprosarium/Unai Tinian, Unai Kammer, Unai Taga, and Unai Tachogna (Figure 3.2-1).”

DoD fails to mention the other frequented beaches in the Military Leased Area (MLA) for recreation, and water quality testing by the Bureau of Environmental and Coastal Quality (BECQ): Unai Chulu, Unai Babui, Unai Lamlam, Unai Masalok, Unai Dankulo, and Unai Chiget beach that was recently re-opened to the public. DoD removed a corridor of UXO to create a path to Unai Chiget; one of the only beach areas on Tinian that contains seagrass (*Enhalus* sp.) in the near shore environment. This makes this location unique from other area beaches for turtle nesting and habitat for other marine animals. These and other beaches are also significant cultural sites.

We would suggest further clearing UXO surrounding Unai Chiget as a safety concern for those visiting this beach both for military purposes, subsistence, and recreation.

*3.2.2 Land Uses and Recreation within the Military Lease Area*

**Page 3-5**

“For cultural sites, the most popular destinations include the Tinian Landing Beaches, Ushi Point Field, and the North Field National Historic Landmark.”

DoD fails to mention any other cultural sites except those that pertain to the military and World War II (WWII). This shows a shocking lack of sensitivity to the other culturally important sites for the Indigenous people of the Marianas that include Taga stones, medicinal plant collection areas, and other significant traditional sites unrelated to wartime. This DEIS should further detail consultation efforts with CNMI’s Historical Preservation Office and other cultural practitioners as well as the Tinian Leadership, summarizing who cultural matters were discussed with, and how impacts to cultural and traditional practices will be avoided, minimized, and mitigated.

*3.3 Socioeconomics*

**Page 3-8**

“No military personnel are permanently stationed on Tinian but in 2020, the U.S. Navy Seabees constructed a temporary Base Camp on the island, referred to as Camp Tinian.”

In 2020 BECQ’s water quality parameters exceeded the CNMI Water Quality standards (WQS) for Enterococci that was associated with the improper disposal of human wastewater from the Seabees base camp. The *2022 Commonwealth of the Northern Mariana Islands 305(b) and 303(d) Water Quality Assessment Integrated Report* found that, “The Tinian Program Manager investigated what may have caused contamination at the remaining sites and discovered in December 2020 that the private wastewater pumper truck company contracted by Department of Defense (DoD) for collecting and disposing of waste from the US Navy Construction battalion’s “Seabees” camp was not always disposing of it in the permitted leaching field. Instead, the company was disposing of the wastewater at the Tinian dump, upland and in close proximity to the sites. The company was notified of this violation, and percent violations dropped”. How will DoD ensure such activities - which do in fact result in significant and measurable environmental impacts with compounding effects on people’s health and livelihoods - be avoided and credibly addressed moving forward should the extent and duration of training activities be expanded as proposed?

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DoD has failed to provide any link to the plans in the appendices that explains the future water quality management plan to ensure such violations of WQS does not occur again. This is extremely important given the proposed much larger 500 tent base camp, and 50% increase in the Tinian population. DoD is relying on an onsite septic system and leaching field, and in some cases resorting to Porta-potties to contain waste. What monitoring and management measures will be implemented to ensure water quality exceedances do not occur due to these activities yet again? Has DoD considered investing in watershed management measures to proactively address past impacts and avoid future contamination? If so, could a percentage of this project’s budget be allocated to support environmental and community benefit projects for the duration of this undertaking? If not, this should be assessed further.

### Page 3-8

“Trends in CNMI government revenue track with the population trends described in the previous section, with revenues declining since 2017 with the loss of garment manufacturing and declines in the casino industry. Natural disasters such as Super Typhoon Yutu in 2018 and the wide-spread impacts of the COVID-19 pandemic further constrained revenues.”

The DoD does not appear to reference the economic impacts of Super Typhoon Soudelor in 2015, which significantly affected the CNMI. Including this context would help provide a fuller picture of the region’s vulnerability and the importance of forward-looking planning. The CNMI has consistently encouraged the DoD to consider more robust infrastructure designs, particularly stormwater catchment systems, based on 100-year and even 1,000-year storm events, given the increasing unpredictability of extreme weather.

Recent flooding events in July 2025 across Texas, New Mexico, North Carolina, New York City, and Kansas City have shown that rainfall is already exceeding the thresholds of traditional 100-year storm models. These trends point to the need for updated risk assessments that reflect the current and future realities of climate change.

To better prepare for these challenges, it is important that the DoD move beyond the outdated Federal Emergency Management Agency (FEMA) flood maps from 2006 and instead utilize the most recent and reliable Geographic Information System (GIS) data, covering rainfall, floodplains, soils, and topography. Doing so will support more resilient planning, reduce long-term costs, and help protect both infrastructure and communities in the face of increasingly severe weather events.

### *3.3.2.1 Local Economic Factors*

#### **Page 3-9**

Tourism is the primary economy of the CNMI.

With the ever-decreasing number of airlifts, a turbulent economy, recent pandemic impacts, and a strong dollar making visits to the CNMI from other countries more expensive, the last thing tourists want is to be exposed to military exercises and overflights. This is especially daunting for Tinian as the DoD states that the areas most visited on island are the areas within the military lease zone:

“Tourism on Tinian includes activities such as visiting historic and cultural sites, exploring unique environmental features, shopping, eating at local restaurants, SCUBA diving, and relaxing on its many beaches. Although tourism occurs on the whole island, specific tourism resources found in the MLA include the 107th U.S. Naval Construction Monument, Japanese Village Ruins, the Old Japanese Communications Center, Mount Lasso, Shinto Shrine, Blowhole, runway CNMI Joint Military Training EIS Chapter 3 June 2025 Revised Draft Existing Environment 3-10 Able, the Atomic Bomb Loading Pits, Ushi Point, three dive locations, and six distinct beaches (Mariana Visitors Authority 2024). “

This will in short shut down the tourism market in Tinian. What mitigation measures are proposed to address this potentially socio-economically cataclysmic impact?

#### *Commercial Agriculture*

#### **Page 3-10**

“An estimated 75 percent of ranchers on the island utilize military land (Tinian Cattlemen’s Association 2023). Although the land use permits between the CNMI government and the ranchers expired in 2016, the ranchers continue to graze cattle primarily on grassland in the

Military Lease Area on a holdover basis. According to the Tinian Cattlemen’s Association chairman, ranchers need a long term lease agreement to qualify for U.S. Department of Agriculture Natural Resources Conservation Service grant funding. Without such funding, many ranchers will struggle to continue operations (Tinian Cattlemen’s Association 2023).“

“Historically cattle ranching has been a subsistence activity on Tinian, but in April 2023, the Tinian Cattlemen’s Association initiated the development of commercial beef production with the construction of a new slaughterhouse, the Tinian Kualidat Meat Processing Center. The facility, which was certified by the U.S. Department of Agriculture in the summer of 2023, can now process up to four cattle per week and is able to sell Tinian beef (Tinian Cattlemen’s Association, Personal Communication, 2023).”

Since much of the grazing is done in the military lease zone, Tinian’s beef market is in danger of also being shut down. Tinian beef is one of the few items that has gained popularity and traction in recent years. Tinian will be losing not only their sustainability, but a source of income for Tinian.

### 3.4 Biological Resources

Figure 3.4-1 Plant Communities on Tinian (North)

#### Page 3-16

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This figure fails to include wetlands mapped and assessed by CNMI BECQ in the 2022 CNMI 305(b) and 303(d) Integrated Water Quality Assessment Report. These include Bateha 1 and 2, and the Mahalang complex. The report and analysis should be revised further to reflect all known and mapped environmentally sensitive areas.

### 3.5 Cultural Resources

#### Page 3-38

“An indirect area of potential effect encompasses the surface danger zone in the waters northwest of Tinian. The former USAGM property on Saipan has been included in the area of potential effect, but as no new uses or construction is planned for this area, there are no activities that have the potential to cause effects on cultural resources and therefore no further impacts analysis is warranted for this portion of the area of potential effects.”

The statement in question is conclusory and should either be omitted or substantially revised. It is insufficient to claim that further impact analysis is unnecessary when proposed actions include the use of live ammunition, high levels of human and vehicular traffic, and repeated detonations. These activities pose clear risks to cultural resources and local wildlife.

To comply with NEPA requirements, the agency should conduct a Supplemental Environmental Impact Statement or at least an Environmental Assessment that specifically evaluates the cumulative and site-specific impacts of these operations. This should include field surveys for cultural resources, species-specific wildlife impact assessments, and robust public engagement, and not just a poster session. The claim that due diligence has been met through analysis alone is inadequate when the potential for irreversible damage to sensitive resources remains unaddressed.

**Page 3-74**

“This section describes current public health and safety conditions on the island of Tinian for the following categories: ground training, aviation training and civilian aviation, radio frequency and microwave emission, unexploded ordnance and discarded military munitions, hazardous materials and waste, natural hazards, wildfire, flood hazards, and protection of children from environmental health and safety risks.”

As has been documented extensively in numerous studies, the presence of service personnel over an extended period also raises the possibility of violence against the civilian population (Horiuchi, Y., & Tago, A. (2023). U.S. Military Should Not Be in My Backyard: Conjoint Experiments in Japan. *Journal of Conflict Resolution*, 68(9), 1798-1824. <https://doi.org/10.1177/00220027231203607> (Original work published 2024). This is not conjecture. Brawls, sexual assaults, rapes, and other violence upon civilian populations occur at and near military bases and installations around the world.

Does DoD have any kind of enforcement or plans for preventing such occurrences from happening on Tinian, as lessons learned from other locations?

The incidence of sexual violence and harassment associated with military personnel stationed in Okinawa is well-documented and serves as a troubling precedent for what may occur on Tinian with an expanded military presence (Asia-Japan Women’s Resource Center. “*Urgent Statement Protesting Sexual Violence and Information Cover-Up by US Forces in Okinawa*” AJWRC Oct 10, 2024. <https://www.ajwrc.org/7693>).

Over the decades, numerous reports and investigations have highlighted cases of sexual assault involving U.S. service members, leading to widespread community concern and strained relations between the military and local residents. These incidents often disproportionately affect women and vulnerable populations, exacerbating social tensions and undermining public safety. Given the similarities in small island communities, increased military activity on Tinian raises legitimate concerns that such negative social impacts, including heightened risks of sexual violence and harassment, could also manifest here. Without proactive policies, community engagement, and strict enforcement of conduct standards, Tinian may face similar challenges that threaten the well-being and safety of its residents.

**Page 3-76**

“The single known source of unexploded ordnance after World War II is the Tinian Mortar Range (also known as the Chiget Mortar Range), located on the island’s northeastern coast, which was used for military live-fire training events from 1945 through 1994 (GMP 1997). This former mortar range is now fenced and is being addressed under the Navy’s Munitions Response Program (DON 2015).”

When will the DoD fully complete UXO clearance operations in the area surrounding Unai Chiget, rather than limiting its efforts to establishing a narrow corridor marked only by bollards—an approach that provides minimal deterrence to accidental entry and offers inadequate long-term safety? Given the historical use of the area as a mortar range, the continued presence of UXO poses a substantial and persistent threat to both local wildlife and unsuspecting civilians. A comprehensive clearance effort is necessary not only to fulfill environmental and public safety obligations, but also to demonstrate a meaningful commitment to responsible remediation of former military training areas.

**Page 3-77**

“The military ensures proper storage and handling of hazardous materials inside an impervious barrier and away from catch basins, storm drains, and waterways. The military also complies with the Tinian Spill Control Plan and has trained spill response teams available during training events (M. Cruz, Joint Region Marianas, Personal Communication, 2014).”

In June 2022 Joint Region Marianas (JRM) Naval Facilities Engineering Systems Command (NAVFAC) was conducting the in-water Tinian Harbor construction project. The Saipan Tribune published an image on the front page of the newspaper with an image of an illegal discharge of sediment directly into Tinian Harbor by DoD contractors. A request was made to the paper by Our Common Wealth 670 to provide a copy of the image and any other images taken that day for verification purposes (image from Saipan Tribune: photo 220609-N-WU304-0419).



This event led to BECQ issuing a Notice of Advisory for failing to comply with the Condition of the Waiver of Water Quality Certification granted in November of 2020. A response to the Advisory by DoD was never provided, nor was any corrective action offered to BECQ thereafter (personal

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communication with BECQ personnel). This creates a public sense of distrust in DoD's capability to effectively oversee contractors and ensure that they comply with CNMI laws and regulatory requirements in the way of spill control plans, or responses to illicit discharges into the near shore or terrestrial environment.

Please provide details of management plans already in place that will prevent further intentional discharges or mishaps, as plans are currently inaccessible from the DoD's website links.

### 3.10 *Public Health and Safety*

#### Page 3-76

##### 3.10.4 *Unexploded Ordnance and Discarded Military Munitions*

"Unexploded ordnance and discarded military munitions from World War II are present on Tinian. These include tank munitions, mortars, and bazookas used during ground assaults. After the initial battle, the U.S. military constructed airfield facilities on the northern part of the island, which involved grading and the use of fill material from other parts of the island. The 2010 Final Historical Ordnance Assessment, Guam and CNMI Area, P-50, identified shallow soil and this extensive construction of U.S. military facilities at North Field as mitigating factors that reduced the potential presence of unexploded ordnance (DON 2010). In addition, unexploded ordnance was removed during the subsequent rebuilding of San Jose and the Port of Tinian. Unexploded ordnance may still be present on Tinian in undeveloped areas or at depths below previously disturbed areas (DON 2010). A 2015 Environmental Report for Tinian confirmed the presence of unexploded ordnance near caves along the cliffs below the east side of Mount Lasso (DON 2015).

The northern third of Tinian is classified as a high probability area for the presence of unexploded ordnance, and the middle third of Tinian is classified as a medium probability area.

The single known source of unexploded ordnance after World War II is the Tinian Mortar Range (also known as the Chiget Mortar Range), located on the island's northeastern coast, which was used for military live-fire training events from 1945 through 1994 (GMP 1997). This former mortar range is now fenced and is being addressed under the Navy's Munitions Response Program (DON 2015). The U.S. military, the U.S. EPA, and the CNMI routinely advise the public not to handle or step on any suspicious items, and to report the presence of such items immediately. Qualified military explosive ordnance disposal technicians investigate reports of suspicious items and if unexploded ordnance were to be identified, they would handle and remove it for offsite disposal or destroy it in place if deemed unsafe to move. All actions to address munitions of explosive concern would be in accordance with local and federal regulations or instructions."

The presence of UXO from WWII on Tinian highlights the long-lasting impact of military activity. However, this section underestimates the compounded risks of historical UXO combined with new military operations. Despite past clearance efforts, UXO remains a serious hazard, especially in high and medium probability zones.

The proposed expansion of live-fire training and construction will likely disturb areas where UXO still exists, increasing the risk of accidental detonations and environmental harm. The discussion lacks sufficient detail on proactive UXO surveys, ongoing monitoring, and timely community notifications critical to safety.

This legacy issue is not static but is instead intensified by new military activities. The failure to address these combined impacts more robustly reveals a significant gap in the DEIS's environmental and risk assessment.

### 3.11 Utilities

#### Page. 3-83

##### 3.11.2 Wastewater treatment

“The Commonwealth Utilities Corporation has initiated a feasibility study for a new wastewater treatment system with collection mains for Tinian (CNMI Bureau of Environmental and Coastal Quality, Personal Communication, September 12, 2024). Until such a system is funded and constructed, residents and visitors will continue to rely on private septic systems.”

We recommend that DoD with its budget of \$50 billion dollars for the Marianas, invest into the infrastructure of Tinian to fund a wastewater treatment system for all (Forbes, Senate Armed Services Committee hearing June 25, 2025, <https://www.youtube.com/watch?v=yT2r3BKnQZo>). Given that DoD is proposing to increase the population requiring such infrastructure by at least 50% (1000 military personnel for four (4) weeks up to four (4) times) of a calendar year.

#### Page 3-84

“...the open dump as the only solid waste disposal option on Tinian (USMC Utilities Working Group Meeting April 2023). Because the existing Puntan Diablo disposal facility has limited remaining capacity, the CNMI is initiating permitting efforts for a new landfill at Atgidon site,...”

We recommend that DoD, with its budget of \$50 billion dollars for the Marianas, invest into the infrastructure of Tinian to fund a Solid waste disposal facility and larger recycling center for the same reason as above. Given that DoD is proposing to increase the population requiring such infrastructure.

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In the interim, DoD has offered no completed management plan for where or how it will remove recycling or dispose of its solid waste. The DoD has had over a decade, since the 2015 DEIS comments were made to establish such a plan and contracts with off island facilities for receiving its waste. Yet nothing has been established, and DoD has continued to train on Tinian and produce solid waste and waste water. This is a clear lack of foresight and planning. No reason is provided for the lack of an existing program.

“Feeder 4 supplies power within the Military Lease Area to the former USAGM facility. Feeder 4 has a 5-megawatt capacity with the USAGM using 1.4 megawatts, leaving 3.6 megawatts available in the Military Lease Area. See Appendix M, Electrical System Analysis for detailed information on the existing electrical power system.”

We suggest that DoD investigate renewable energy to augment their electrical needs as opposed to burdening the CNMI’s aging diesel-fueled power plant, in keeping with the DoD claim to addressing climate change impacts and as a self-purported ‘environmental steward’.

### 3.12 Topography, Geology, and Soils

No meaningful information is provided in this section. Tinian and the rest of the Marianas are on active mapped fault lines. Indeed, the Mariana Archipelago makes up a part of the Pacific “Ring of Fire” and the reason why these islands must be resurveyed regularly by the United States Geological Survey to update survey benchmarks and GIS data layers in keeping with the shifting tectonic plates. DoD fails to address the risks associated to infrastructure and public health with these geological hazards.

The geology and soils of Tinian, much of which is karst, creates poor conditions for maintaining aquifer integrity. CUC on Tinian uses but one *sole source aquifer* for the population and visitor’s public water supply. Running an underground fuel pipeline over this site is hazardous and should be reconsidered as the optimal means for supplying aircraft fuel to the airport.

Uses related to the United States Agency for Global Media (USAGM) Saipan site should be omitted from this DEIS as USMC does not hold a lease for any use at that site.

### 3.13 Groundwater and Hydrology

When describing the hydrology of Tinian, this section does not make the critical acknowledgement that Tinian has but one *sole source aquifer*. This issue and concerns regarding impacts to this interconnected system, and what water rights (if any) are included in the MLA was raised over a decade ago (see *Saipan Tribune, Military plans to drill own water wells on Tinian, 2015*). Critical ecological and legal analysis is lacking from this section. The sole source hydrology / geology should be clearly acknowledged. Additional analysis should reflect what right(s) to groundwater the DoD currently has or wishes to obtain under the current lease, especially given Public Law 06-12 regarding ground water resource rights.

What groundwater flow model was used to create Figure 3.13-1 visualizing Tinian’s groundwater wells, elevation, and flow direction? What is the significance of the label “DRAFT - deliberative not for distribution” included in this figure?

37N | Figure 3.13-1 includes a notation “Wells being investigated by Seabees for rehabilitation” - please clarify the graphic to depict which well(s) is identified and update narrative to discuss current use

37N | and availability of groundwater sources. In addition to the 100-year flood zone, mapped wetlands should also be visualized in this graphic.

### 3.14 *Surface Waters and Wetlands*

Please see prior comments on inconsistent identification and mapping of wetlands throughout the DEIS. Environmentally sensitive areas and reasonable buffer areas should be identified consistently throughout this DEIS.

## 4 ENVIRONMENTAL CONSEQUENCES

### 4.1 *Public Access*

#### Page 4-1

DoD provided no pertinent data to demonstrate how each alternative would quantitatively impact subsistence activities, tourism, recreation, ranching, and cultural traditions. For example, how would Tinian’s annual gross revenue be impacted? What would be the percent loss or increase in food security, family income, sense of wellbeing, or support of culturally important indigenous traditions? Providing the difference in frequency of training is an insufficient measure of costs and benefits of each alternative. There is nothing here for the reader to measure.

#### Page 4-3

37K | It is unclear from the narrative how frequently public access will be restricted, and when boat and air traffic will be re-routed during danger zone activation periods. Travel by boat and plane between Saipan and Tinian is already costly and challenging, and adding 2 to 4 mile diversions will have direct economic costs to air and boat travel that have not been well quantified or addressed. It is unclear how these impacts can be considered less than significant when the extent of the impact itself is not articulated. How will increased air and boat travel costs be mitigated?

Personal communications from Joint Region Marianas (JRM) staff and other non-publicly available correspondence should not be viewed as authoritative or representative of the impacted user groups addressed in this section.

#### Page 4-6

Reopening areas “as soon as possible” does not support a finding of less than significant impacts. What efforts have been made to ensure these interruptions do not impact subsistence fishing and cultural practices? A communications and community engagement plan should be included

to specify details of coordination with a dedicated JRM staff person designated with responsibility for ensuring timely coordination with stakeholders including cultural practitioners, subsistence fishers and farmers, as well as tourism and recreation groups.

While bicycling is referenced as a use (see Page 3-6), the annual Tinian "Pika" Bike Race that historically has transited through North Field up to Ushi Point does not appear to be assessed. Will the route be accommodated for this annual event?

#### **Page 4-7**

37J

When discussing efforts to minimize impacts to public access, the DEIS describes "adaptive management" measures to provide a "structured and flexible decision-making process that allows for adjustments over time based on new information and changing conditions. This approach would be used to refine the "scheduling of training". Who is responsible for ensuring this coordination? What is the minimum notice to the public the USMC commits to providing for planned closures? The CNMI community has experienced numerous notifications going out just days before planned activities, usually referencing coordinates that lay people are not familiar with, which does not provide sufficient time for the community to work around these disruptions to access. What actions will be taken to ensure the general public is well aware of access restrictions and in a timely manner?

#### **Page 4-7 - 4-8 Summary**

No quantitative analysis was provided in this section regarding the proposed extent, duration, and therefore the extent of proposed uses and their impacts. While references to supporting coordination were made throughout, no specific management authorities, measures, timelines, or protocols were committed to. If actions will be taken to minimize impacts to public access these should be articulated specifically.

#### **Page 4-8 Construction**

No quantitative analysis was provided regarding the extent of construction, which under Alternatives 1 and 2 is proposed to last from 10 to 15 years. It is hard to imagine how such an extensive construction project would not impact public access as there is already limited road access to recreational, historical, and cultural sites within the MLA. Construction impacts should be clearly detailed so they can be assessed and addressed.

#### *4.2 Land Use and Recreation*

#### *4.2.3 Alternative 1*

#### *4.2.3.1 Compatibility and Consistency with Existing Land Use Plans and Policies*

Page 4-9

“Training

Under Alternative 1, the entirety of the Military Lease Area would be used as a training area. Training events would continue and would increase over the No Action Alternative by approximately 15 percent. Ground and aviation training events that would occur in the Military Lease Area would be the same or similar to those currently authorized for Tinian under prior environmental analyses. Alternative 1 would expand training infrastructure to include two livefire ranges (Multi-Purpose Maneuver Range and an Explosives Training Range), improvements to North Field, 13 Landing Zones throughout the Military Lease Area, and the establishment of a Base Camp, surface radar towers, and other supporting infrastructure. “

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The DEIS states that under Alternative 1, the “entirety of the Military Lease Area would be used as a training area” and notes that under this alternative training would increase by 15%, but it is never well articulated what that means in terms of actual use and access. Prior references discuss environmentally and culturally sensitive areas where training would not occur, which seems to conflict with the statement that the “entire range” would be used for training. Is it all or some? This is an important point that should be clarified in the revised or supplemental EIS as this document remains inadequate to support meaningful public understanding let alone review of proposed actions.

“Compatibility and consistency with existing land use plans, policies, and other agreements was analyzed by comparing land use and management under the Proposed Action to the requirements of: (1) The Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America (The Covenant), which was approved and became effective on March 24, 1976; (2) the Technical Agreement Regarding Use of Land to Be Leased by the United States in the Northern Mariana Islands (Technical Agreement) signed on February 15, 1975; (3) the 1983 Lease Agreement, subsequently amended in 1988, 1994, 1999, and 2023, (4) the 1999 Conservation Agreement in relation to Fish and Wildlife Service Biological Opinion 1-2-98-F-07 and signed in conjunction with the 1999 Lease Amendment, and (5) the 2019 Commonwealth Ports Authority Lease as amended in 2023.”

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DoD has failed to consider compatibility and consistency with the CNMI Division of Public Lands Comprehensive Sustainable Development Public Land Use Plan mandated by Public Law 20-20, or any environmental restoration plans established by key Federal or CNMI environmental agencies. The United States Department of Agriculture (USDA), United States Fish and Wildlife Service (USFWS), and National Oceanic and Atmospheric Administration (NOAA) have several plans in place to protect CNMI resources, yet these were summarily dismissed from this analysis without explanation. Instead, DoD’s environmental stewards just refer to the basic lease agreement requirements. There is no consideration about working within the plans laid out by the islands’ professional planners and resource managers, so leased land may one day be

returned in the same condition as it was obtained or better, e.g., improved or upgraded infrastructure for all.

**Page 4-10**

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The DEIS states “Non-live-fire training could occur throughout the Military Lease Area” but does not analyze what that means in terms of public access, land use, or recreation. Would non-live-fire training also prompt area closures? If so, for how long and how often? Duration, frequency, and extent of proposed 15% increase in training remains very vague and unclear in terms of actual likely direct, indirect, and cumulative impacts to the public land use and recreation resources that are the subject of this section.

The DEIS also appears to include activities on Saipan although stating numerous times in this section that the scope is limited to Tinian, for example, “The USAGM site on Saipan already contains communications equipment and additional communication equipment at the site would be compatible with the existing land use. Once USAGM functions cease at the Saipan site, a new lease from the CNMI would be required for this location, which is designated as public land”.

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If the lease of the public lands on Saipan for the radio tower site is necessary to support proposed operations of this activity they should be assessed together. It is unclear how lease of additional (and very limited) public lands in CNMI for exclusive DoD use is consistent with the [CNMI Covenant](#) - which specified which lands would be leased in Section 802, with only Tanapag Harbor specified on Saipan, or the Public Land Use Plan referenced in this section.

**Page 4-12**

“Construction of the aircraft shelter would require negotiation of additional rights under the 2019 Commonwealth Ports Authority lease and amendment of the TNI Airport Layout Plan. The biosecurity site at the Port of Tinian would require negotiation of additional rights with the Commonwealth Ports Authority but would be located on land that has already been cleared, would be compatible with existing surrounding port uses, and would not impede use of the small boat ramp and marina. Placement of additional communication equipment at the former Saipan USAGM site would be consistent with the existing communications infrastructure at the site.”

Is the construction being assessed in this proposal, or a separate future EIS, or an amendment to the Tinian Divert Field? It seems this DEIS is inconsistently referencing proposed actions that it does not have land rights to as ancillary or connected activities without including them in the scope of the proposal and its analysis. All likely impacts should be assessed herein. Similarly, the additional clearing and ground disturbance for proposed infrastructure (for example, utility lines to CUC) should be quantified and discussed.

**Page 4-16**

### 4.3 Socieconomics

#### Page 4-16

##### 4.3.1 Approach to Analysis

“Both qualitative and quantitative techniques were used. Due to the need to maintain flexibility in scheduling proposed training throughout the year, the USMC is unable to estimate the number of days or specific locations of where temporary access controls would occur on an annual basis, and thus a quantitative analysis of *specific economic impacts (e.g., potential gain or loss in revenue, amount of additional commuter flights to and from Tinian, number of hotel rooms) would be speculative.*”

This is a blatantly misleading statement, or worse, an untruth. Qualitative and quantitative techniques were *not* used. As it is stated due to flexibility in scheduling DoD could only “speculate”. This is a significant substantive failing that can only be addressed through revisions that clarify the approach here, or, better yet, through use of vetted socio-economic modeling that reflects industry standards and best methodologies.

The socioeconomic analysis in the DEIS notably lacks a rigorous financial assessment of the economic benefits and costs associated with military activities on Tinian and the broader CNMI. This gap is especially concerning in light of recent statements by CNMI Representative Marissa Flores in early 2025, who publicly criticized the inadequate tax and fee payments made by military contractors and developers operating in the region (<https://www.facebook.com/watch/?v=23870348035938894>). According to Representative Flores, as of March 2025, the CNMI government had only collected approximately \$87,000 in fees and taxes related to military projects, despite the fact that the value of these projects exceeds \$153 million. This massive discrepancy suggests that less than 0.06% of the total value of military-related economic activity is being returned to the local government through direct revenue. Such an imbalance raises critical questions about whether the current tax frameworks and enforcement mechanisms adequately capture and recover revenues owed to the CNMI. Moreover, Representative Flores emphasized that this shortfall could severely limit the government’s ability to fund essential public services and infrastructure that will inevitably bear increased strain due to expanded military presence and activity. The DEIS should explicitly address these concerns by including an economic impact analysis that incorporates verified tax revenues, potential revenue gaps, and the implications for CNMI’s fiscal health. Without this, the analysis risks overlooking significant socioeconomic costs borne by the local population, and it fails to provide a transparent accounting of how military investments translate into tangible benefits, or burdens for our community.

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#### Page 4-17

“Improved access to cultural sites in the Military Lease Area, especially related to the North Field National Historic Landmark, would provide a modest benefit to tourism and local residents who would access the area for subsistence practices and enable social cohesion from these practices.”

Residents and tourists have never had a problem accessing these areas or beaches in all the years that the land has been leased to DoD. Therefore, simply stating that there would be a modest benefit to tourism and residents is unsubstantiated. DoD failed to conduct any objective analysis, e.g., user surveys; a minimum effort considering the costs of the proposed CJMT actions.

## Page 4-18

### 4.3.3 *Alternative 1*

#### *Population and Demographic Changes*

“Under Alternative 1, small, medium, and large training events throughout the year would cause short-term and temporary population increases.”

The increase in population may be as much as 50% on a small island, which is slated to last a month at a time up to four (4) times per year. This is hardly “temporary” as it would occur each year and may be overlapped with small and medium events. Making infrastructure improvements all the more necessary to handle this increase in population, water and utility usage, and solid waste and wastewater management. Therefore, we do not support Alternative 1 as a feasible use of land due to its significant and unmitigated impacts to people, the economy, and the environment.

#### *Effects on Economic Activities in the Military Lease Area*

“Due to the need to maintain flexibility in scheduling proposed training throughout the year, any quantitative estimates on the number of days or specific locations of closures would be highly speculative in nature.”

Therefore, DoD provides no forethought whatsoever. This lack of general planning by DoD demonstrates that this DEIS should not have been released for comment. One cannot comment on plans that do not exist. Therefore, we respectfully request that a halt be placed on the stated comment period until the DoD has had more time to consider exactly how their training exercises may be scheduled along with contingency plans for when unexpected delays or cancellations may occur.

## Page 4-19

“It is possible that members of the public could expect to see service members moving through an area on foot, military vehicles parked on access paths, military aircraft flying overhead, or hear

noise related to training (e.g., aircraft and weapons firing) when training events are scheduled in the Military Lease Area.”

and

“Live-fire training events may occur during the daytime or at night.”

DoD fails to discuss what the impact of near constant presence of military personnel, weapons and war equipment will have on the peaceful civilian population that deserves to continue to live and raise their families in a serene island setting. Live-fire training is unsettling at best during daylight, but during the night is even more horrifying to contemplate.

We are alarmed that impacts to families’ health, especially that of our children (both mentally and physically), is not considered in DoD’s determination that Alternative 1 is the proposed action.

The cumulative impact to mental stress from war has been shown to lead to intergenerational transmission of trauma in other indigenous populations around the world. This trauma has led to detrimental epigenetic impacts in humans, not to mention disruption to wild and domesticated animals’ behavior.

The irreparable degradation of land and cultural desecration as the result of war, whether in training for war or play-acting war in exercises, is uncondusive to island life. We therefore recommend that the “no Action” alternative for live-fire and mortar ranges on Tinian be selected as the only reasonable alternative. Not all war game activities need be carried out in one location, especially on such a small rural land mass with distinct unique island ecosystems.

#### **Page 4-20**

“As described in Appendix J, Noise Study, Attachment 1 (refer to Section 1.3.12.1 Domestic Animals), *many studies have concluded that there is no evidence* that aircraft overflights affect feed intake, growth, or production rates in domestic animals, and that cattle are able to adjust their behavior to changes in ambient noise levels.”

DoD should have provided a hyperlink to the specific section of Appendix J to make it easier to navigate to the referenced study(s), and should acknowledge conflicting reports rather than cherry-picking studies. In fact, many studies and reports including the often referenced 1988 synthesis of [“Effects of Aircraft Noise and Sonic Booms on Domestic Animals and Wildlife”](#) from the US Air Force and FWS indicates that many studies have found particularly low altitude aircraft noise can cause observable stress responses in domestic and wild animals, potentially leading to panic reactions, increased glucose levels and heart rate which may further result in reproductive failure and weight gain problems. Surely this and more recent research and analysis documenting

known responses and concerns to human and animal noise receptors should be included and addressed.

Notably, the 1988 synthesis report notes the need for additional research across species. Also of concern, that report highlights how “[m]ammals that use echolocation or biological sonar to perceive the locations of objects in their environments have unusual acute capacities for localizing sound (echo) sources and for perceiving reverberation, because they rely on echolocation for spatial perception (Simmons 1983)”.

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The report noted several studies regarding impacts of sonic booms on marine mammal populations as well as recommendations of “careful observation of behavioral effects of space shuttle booms” on marine mammals, coupled with long-term population monitoring. The noise analysis maps provided in the “noise” summary poster appear to focus only on the on-the-ground live-fire activities, which does not properly summarize the extent of impacts or the analysis in these sections of the report. Overall, the DEIS analysis does not account for or assess additional impacts from significant increases in air traffic including analysis of the extent of low or high altitude sonic booms on receiving populations which include humans, marine and terrestrial species (many of which are listed as endangered) or domestic livestock and other animals. This section should be revised to include best available science regarding impacts on people and animals including terrestrial and marine endangered species. Monitoring should also be put in place where data gaps remain, to ensure direct, indirect, and cumulative impacts of these and related DoD activities do not result in unpermitted and unmitigated “take” of listed species or species of concern.

Reading further into Section 1.3.12.1, studies have been many but are not conclusive. This section states, “While the existing literature does include studies on possible effects of jet aircraft noise and sonic booms on wildlife, there appears to have been little concerted effort in developing quantitative comparisons of aircraft noise effects on normal auditory characteristics. *Behavioral effects have been relatively well described, but the larger ecological context issues, and the potential for drawing conclusions regarding effects on populations, has not been well developed.*”

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It is also apparent that the studies did not include fauna common to our islands. The DoD had a decade to perform similar studies on Tinian wildlife before releasing this DEIS for comment. Yet none were carried out. We respectfully request that the comment period be extended until such time that pertinent studies are completed so we will have something to review pertaining to our unique island ecosystems.

#### Page 4-21

*Impacts on Other Economic Activities on Tinian*

“New employment opportunities and the acquisition of supplies required to operate and maintain the Military Lease Area Range Complex would provide a modest benefit to Tinian’s economy. Spending would likely include payments to the Commonwealth Utilities Corporation for electrical and communications infrastructure, the purchase of fuel from local distributors for non-tactical vehicles, and local purchase of goods and supplies for vegetative control and other facilities maintenance-type activities, where permissible under federal government contracting requirements. In addition, as service members and supporting personnel are arriving to or departing from the CNMI during training events, they would have the opportunity to recreate in San Jose and spend money in town at shops and restaurants. This spending would have an indirect beneficial impact generated by training throughout the year, although it would, in turn, likely provide a benefit to the economy of Tinian and the supply chains throughout the CNMI.”

The assertion that military activities would provide a “modest benefit” to Tinian’s economy fails to adequately account for the larger context in which these benefits are situated. The economic gains described, such as limited government contracts, increased fuel purchases, and some short-term spending by transient personnel, are relatively minor and sporadic. These gains do not offset the long-term economic risks and disruptions the proposed military build-up would impose on key industries, particularly tourism, subsistence fishing, and local agriculture.

The analysis presumes that service members recreating in San Jose will meaningfully contribute to local economic activity. However, this assumption is speculative and lacks data. Soldiers and other military personnel often operate on base or in self-contained environments with limited interaction with the broader community, particularly in training contexts. When military demand intersects with limited local infrastructure like hotel rooms or air travel, this results in displacement of the already existing economic activity, not net growth. Tourists and visitors may be deterred by increased militarization, the presence of weapons and military aircraft, noise, restricted access to beaches, and unpredictable availability of accommodations and flights.

The section also minimizes the cumulative economic strain imposed by temporary but recurring training events. The claim that events will be scheduled to avoid conflict with “important local events” offers limited reassurance and lacks enforceable commitments or details. There is no analysis of how frequent or prolonged military presence will erode the perception of Tinian as a peaceful and welcoming destination which is an essential component of its tourism-dependent economy.

The economic impact assessment presented in this DEIS skews toward optimistic projections without sufficient examination of negative externalities or opportunity costs. There is no meaningful cost-benefit comparison between the projected “modest” military-driven spending and the potential economic losses from reduced tourism, agricultural displacement, or restricted access to traditional and commercial fishing areas. A more rigorous assessment should include detailed modeling of net economic impacts, incorporate local business and community input, and weigh the military’s economic footprint against the loss incurred in sectors foundational to Tinian’s long-term sustainability and cultural identity.

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**Page 4-21 and 4-22**

The Revised DEIS notes “New Employment opportunities and the acquisition of supplies required to operate and maintain the Military Lease Area Range Complex would provide a modest benefit to Tinian’s economy.”

The DEIS fails to adequately address the broader socio-economic consequences of military expansion in the CNMI, particularly regarding the economic implications of increased DoD activity. While the DEIS may highlight projected economic benefits from military spending, it omits crucial evidence showing that such spending can actually have a long-term negative impact on economic growth. According to research summarized by the Peace Science Digest, a 1% increase in military spending over a 20-year period can lead to a 9% decrease in a country’s economic growth. This finding undermines the assumption that increased military investment will inherently benefit the local economy in a sustainable way.

The DEIS overlooks the competitive disadvantage local CNMI businesses face when bidding for DoD contracts. As Edward C. Camacho, Special Assistant to the CNMI on Military Affairs, noted in a recent news release by *Marianas Press*, while nearly \$500 million in activity may be generated in one year alone, “the reality is that most of these contracts are awarded to off-island companies.” (<https://www.youtube.com/watch?v=dQUsb3HRxZI>). This indicates that the projected economic benefits will likely not remain within the local economy, but instead flow outward, exacerbating existing economic inequalities and limiting community-based economic development.

By failing to engage with these well-documented economic realities, the DEIS presents an incomplete and potentially misleading picture of the true costs and benefits of militarization in the CNMI. A more rigorous analysis is required, one that adequately assesses both the short-term gains and long-term economic risks, especially for marginalized island communities.

*Public Services*

**Page 4-22**

“The existing rainwater catchment system at the USAGM Tinian site would continue to be utilized for fire protection. In addition, a Range Wildland Fire Management Plan would be developed.”

We respectfully request that the comment period be extended until such time that a Wildland Fire Management Plan is developed.

This section on Public Services appears to outline coordination and mitigation plans for fire, emergencies, and medical response related to military activities on Tinian. However, the analysis

is overly optimistic and lacks a critical assessment of potential strains on local public services that may arise from increased military presence and activity.

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While mutual aid agreements and memoranda of understanding with local fire, police, and emergency services are mentioned, there is no substantive evaluation of the current capacity of these agencies or how increased demands might impact their ability to serve both military and civilian populations simultaneously. The document should analyze whether existing fire and emergency services have sufficient personnel, equipment, and funding to handle potential increases in incidents, especially considering that military training activities, including live-fire exercises, inherently increase risk levels.

The reliance on military-provided medics and evacuation off-island for serious medical emergencies does not adequately address the potential for immediate healthcare resource demands on Tinian's local healthcare infrastructure. Even minor increases in medical incidents can overburden a small island's limited healthcare system, particularly if evacuation is delayed due to weather, logistical challenges, or other emergencies. The analysis should include an evaluation of the very limited local hospital capacity (*Tinian Health Center has only six (6) exam rooms, Saipan's Commonwealth Health Care Corporation (CHCC) Center has only 86 hospital beds*), emergency room resources, and ambulance services in relation to possible increases in demand.

The phased hiring of only 30 to 50 new permanent Range Control staff over 10 to 15 years seems minimal given the scale of proposed military activities. It is unclear whether this staffing plan includes support for emergency management, safety enforcement, or community liaison roles that could mitigate impacts on public safety and services.

The analysis does not consider the indirect impacts of increased population and military activity on public safety beyond fire and medical emergencies. For example, there is no mention of potential increases in crime, traffic incidents, or social tensions, addiction, domestic violence, and sexual assault, which often accompany large military expansions. A thorough public services impact assessment would include these factors and propose concrete mitigation measures.

In sum, the section's conclusion that there would be "less than significant impacts" on public health and safety services under Alternative 1 appears premature without a more detailed, data-driven evaluation of existing service capacities, risk factors, and the cumulative effects of military operations on the local community's public services.

#### 4.3 Socioeconomics

##### 4.3.3.2 Construction

**Page. 4-23**

*Population and Demographic Changes*

For the most part DoD will be relying on H-2B visas for construction crews. No mention is made of funds being allocated in the past, now, or in the future for student scholarships at Northern Mariana College or to Northern Marianas Technical Institute to assist in training the existing CNMI population to provide such services and build the local workforce. Such funding could have been spent over the past 10 years since the first CJMT DEIS was written, where a similar lack of available construction workforce was noted. DoD again fails to plan or use their funding to improve the local economy or workforce. Instead, it will go to Off-island man-power agencies and non-local contractors who will benefit while local businesses are underutilized.

4.3.3.2 *Construction*

**Page 4.24**

*Economic Activities*

“While construction is underway, the demand for flights and port traffic from Saipan would increase temporarily to accommodate additional workers and construction equipment and supplies. The movement of goods through the Port of Tinian and TNI would create an economic benefit for Tinian during the construction period. Additionally, as described above, assuming the off-island construction workers are able to reside in the dormitory buildings instead of other local hotel accommodations typically used by tourists or other short-term visitors to Tinian, there would be a less than significant impact to the availability of hotel rooms on the island during the construction period.”

This ‘*economic activities*’ section underestimates and overly minimizes the potential negative impacts of construction on Tinian’s local economy and community well-being. While acknowledging some temporary benefits such as increased port traffic and flights, the analysis largely frames these changes as positive or neutral without adequately considering broader or longer-term consequences. The assumption that construction workers will primarily reside in dormitories rather than local hotels ignores the risk of displacement or overflow impacting the fragile tourism sector, which is vital to the island’s economy. Dismissing noise, traffic, and visual disturbances as merely “localized” and “temporary” ignores the reality that a 10 to 15-year construction period is lengthy enough to cause significant and recurring disruptions, potentially deterring tourists and harming ranching and subsistence activities.

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Moreover, the vague commitment to road improvements lacks detail on scale, timing, or community benefits, raising concerns that increased construction traffic could worsen road conditions without adequate mitigation. The suggestion that cattle and wildlife will simply

“adjust behavior” overlooks potential negative effects on livestock health and productivity, threatening the nascent commercial beef industry critical to local income. Overall, the section’s conclusion of “less than significant” impacts is unsupported by sufficient evidence or stakeholder engagement. This analysis downplays substantial risks to Tinian’s economic and social fabric and requires a more thorough, transparent, and data-driven assessment to ensure meaningful mitigation and protection of the island’s livelihoods.

#### 4.4 *Biological Resources*

##### **Page 4-26**

##### 4.4.3.1 *Terrestrial Plant Communities*

Under Alternative 1, would result in a “Direct loss of up to 229.7 acres of *Leucaena* forest” and “...up to 50.9 acres of secondary limestone forest would represent an approximate 0.8 percent decrease in the 6,207 acres of secondary limestone forest currently on Tinian.”

and “Approximately 19 acres (2 percent of the Natural Resources Conservation Area) would be cleared for construction of the Landing Zones and access road.”

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This loss of important forested areas, in addition to destroying contiguous native canopy, allows the encroachment of invasive vines and other non-native species that will not be addressed by DoD’s biosecurity plans. This loss of natural forest and clearing within the Conservation Area are significant impacts, particularly noting the relative scarcity of these areas on Tinian and throughout the CNMI. Therefore, Alternative 1 is not defensible and an unacceptable loss of terrestrial habitat. Impacts to these areas should be avoided and minimized first and foremost. Any unavoidable impacts should be acknowledged as significant impacts and should be addressed through dedicated management resources for the lifetime of this proposed action. Funding should be earmarked through bonds to ensure ongoing restoration activities to further mitigate these significant impacts and compensate Tinian and the people of the CNMI for land degradation, habitat loss, and the cascading ecological and economic effects associated with such impacts.

##### **Page 4-33**

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“The proposed use of the mobile radar systems and surface radar towers would introduce the possibility of exposing bats and birds to radio frequency radiation, which is capable of heating organic tissues if exposed to radiation beams for long periods of time...” and “However, these surveillance systems produce radiation at extremely high frequencies (well above 116 megahertz) that are not likely to disturb wildlife.”

Please cite studies that factually demonstrate that wildlife would not be disturbed. Simply stating it is “not likely” is unfounded and anecdotal at best. Especially given that no studies were

conducted on long term sporadic exposure to radio frequencies described above, please provide additional analysis, supporting data, and details regarding how such potential impacts will be monitored for and addressed if observed for the duration of these proposed activities.

**Page 4-34**

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There is no mention in this section how noise and general war game exercises will impact the local community's peace of mind, children's physical and mental health (Santa Barbara J. Impact of war on children and imperative to end war. *Croat Med J.* 2006 Dec;47(6):891-4. PMID: 17167852; PMCID: PMC2080482.,

[https://pmc.ncbi.nlm.nih.gov/articles/PMC2080482/#:~:text=Croat%20Med%20J,6\)%3A891%E2%80%93894](https://pmc.ncbi.nlm.nih.gov/articles/PMC2080482/#:~:text=Croat%20Med%20J,6)%3A891%E2%80%93894)), and cognitive and social-emotional development and wellbeing, residents sleep patterns, and a general increase in anxiety for those that suffer from PTSD, especially our many veterans on islands

4.5 *Cultural Resources*

**Page 4-47**

4.5.1 *Approach to Analysis*

"This analysis considers the impacts of the Proposed Action to cultural resources. Cultural resources include historic properties that are eligible for the National Register of Historic Places and other cultural resources that are not eligible for the National Register of Historic Places but still hold traditional, religious, or cultural importance to the community, such as cemeteries, memorials, and places for growing and/or gathering medicinal plants as discussed in both the Socioeconomics and Biological Resources sections. NEPA incorporates the National Historic Preservation Act analysis of potential effects on historic properties as part of the evaluation of environmental consequences while also addressing environmental impacts to other categories of cultural resources. NEPA and the National Historic Preservation Act are separate statutes that evaluate and address impacts differently. For example, the effects of an undertaking on a historic property can be adverse under the National Historic Preservation Act's Section 106 without triggering a determination of significant impacts for a Proposed Action under NEPA. Under Section 106, adverse effects to historic properties must be resolved through measures that avoid, minimize, or mitigate effects. Under NEPA, potential impacts can also be mitigated through avoiding, minimizing, or reducing impacts."

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This analysis presents a fragmented and inadequate treatment of cultural resource impacts, relying on procedural distinctions between NEPA and the National Historic Preservation Act (NHPA) to downplay the severity of harm to Indigenous communities and their ancestral lands. While the analysis acknowledges that some cultural resources such as cemeteries, memorials,

37T

and medicinal plant gathering areas, may not be eligible for the National Register of Historic Places (NRHP), it fails to explain how these resources will be meaningfully protected or incorporated into the decision-making process. This effectively relegates sacred and culturally significant Indigenous sites to a lower tier of concern. The suggestion that adverse effects under NHPA do not necessarily constitute “significant impacts” under NEPA reflects a regulatory loophole that allows the federal government to dismiss or minimize cultural harms that are deeply consequential for Indigenous communities. Such an approach is incompatible with the federal trust responsibility and with the principles of Free, Prior, and Informed Consent (FPIC) outlined in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), which the United States has endorsed.

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Moreover, this analysis reflects a compartmentalized view of cultural heritage that fails to account for the holistic, place-based, and living nature of Indigenous cultural landscapes. For communities such as the Chamorro and Refaluwasch (Carolinian) people of the Marianas, cultural resources are not limited to built structures or archaeological features - they encompass entire ecosystems, landforms, and traditional practices and the entirety of the archipelago and surrounding air and sea. The lack of discussion around meaningful consultation or Indigenous-led evaluations of significance suggests that the process is being carried out in a top-down, extractive manner, rather than through collaborative, government-to-government consultation as required under Section 106. By focusing on minimization and mitigation rather than avoidance, the analysis implicitly assumes that harm is inevitable and acceptable, which contradicts the legal and moral obligations to safeguard Indigenous heritage.

To comply with both U.S. law and international human rights standards, the agencies involved must ensure that Indigenous definitions of significance are centered in the analysis, that all culturally important sites are treated as presumptively significant regardless of their NRHP status, and that decision-making includes Indigenous communities not only as stakeholders, but as co-stewards. Without these commitments, the Proposed Action risks contributing to the ongoing erosion of Indigenous rights, cultural survival, and environmental justice.

#### **Page 4-48**

“Mitigation measures to resolve adverse effects include providing interpretive signage at the North Field atomic bomb loading pits and Mount Lasso, a virtual tour focusing on the North Field National Historic Landmark and its contributing resources, an interpretive pamphlet on Chamorro history and culture, and a plan to develop an interpretive center on Tinian to display recovered artifacts. While the preference is to avoid and preserve in place, data recovery and recordation methods would be implemented when adverse effects to character-defining features are unavoidable.”

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The proposed mitigation measures: interpretive signage, virtual tours, pamphlets on Chamorro history, and an interpretive center are not sufficient to address significant and potentially

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irreversible adverse effects on the cultural and historical landscape of Tinian, particularly regarding the North Field National Historic Landmark, and associated Chamorro and Refaluwasch (Carolinian) heritage sites. While these measures provide interpretive and educational value, they fall short of the federal requirement to prioritize avoidance and preservation in place, which is clearly articulated as the preferred treatment under Section 106 of the NHPA.

Interpretive tools such as signage and virtual tours do not mitigate the physical loss or alteration of historic fabric, nor do they prevent the disruption of cultural landscapes and community connections to ancestral places. These measures are essentially after-the-fact compensatory actions rather than proactive strategies to avoid harm. Furthermore, reliance on data recovery and recordation when adverse effects are "unavoidable" suggests a foregone conclusion that destruction will occur, rather than a serious effort to consider alternatives that could avoid or minimize impacts.

The mitigation plan also appears to treat Chamorro and Refaluwasch (Carolinian) cultural heritage in a tokenistic way by offering an interpretive pamphlet, without indicating any meaningful consultation with Chamorro and Refaluwasch (Carolinian) communities (including free, prior and informed consent) or incorporation of their perspectives in developing preservation strategies. A successful mitigation plan should include collaborative planning, capacity building for local stewardship, and potentially landscape-level protections that preserve context, not just documentation of features before destruction.

In sum, the proposed mitigation measures are largely interpretive and do not demonstrate sufficient commitment to preserving the integrity, context, and continued cultural significance of the historic and cultural resources at risk. A more robust, community-informed approach is necessary to align with the spirit and requirements of the NHPA and other preservation laws.

## Page 4-50

### 4.5.3.1 Training

#### *Live Fire Training*

“Proposed Live-fire training at two new ranges, the Multi-Purpose Maneuver Range and Explosives Training Range, represent new activities that are part of this Proposed Action. A surface danger zone would become activated during live-fire training at either range and explosive safety quantity distance arcs would be activated when ammunition is temporarily staged at an ammunition holding area during training events (refer to Section 2.1.6 Live-Fire Range Safety Areas and Section 2.1.7 Ammunition Holding Areas). When activated, temporary access restrictions would apply within these designated areas to ensure safe separation from the public. The Multi-Purpose Maneuver Range is aligned so that the proposed surface danger zone would not overlay the North Field National Historic Landmark and its contributing features like the Atomic Bomb Loading Pits - thus these areas could be open to public access during live-fire

training. Additionally, the overall size of the surface danger zone would vary based on the type of ammunition in use, so the smallest surface danger zone corresponding to the ammunition can be activated to further minimize the area where temporary restrictions would apply during live-fire training events.

Even though the location and operational design of the Multi-Purpose Maneuver Range minimizes the area where temporary restrictions would apply, the surface danger zone does overlap other cultural resources, as listed in Appendix H. However, several factors would further minimize potential effects to the character-defining features of these cultural resources should projectiles miss their targets and/or ricochet outside the boundary of the Multi-Purpose Maneuver Range to fall within the surface danger zone. These include limiting the amount of vegetation clearing and ground disturbance within the boundary of the Multi-Purpose Maneuver Range; using small-sized ammunition; and directing ammunition use towards the designated targets within specific objective areas. On rare occasions, a projectile from the Multi-Purpose Maneuver Range may travel outside the target area but still land within the surface danger zone. In the unlikely event that a projectile enters coastal waters, the risk to cultural resources would remain very low. Specifically, after ricocheting, a bullet is deformed and loses considerable amount of velocity through air resistance. Due to this loss of energy, a cultural resource would have to be at or near the point of projectile impact to cause a measurable effect. Once a projectile enters the water, it would further lose energy and move quickly through the water column to settle on the sea floor. Therefore, it is unlikely that projectiles entering coastal waters would result in harm to cultural resources. In the case of the Explosives Training Range, construction of the range itself would result in the removal of several contributing features within the associated cultural resource (see Section 4.5.3.2 below), thereby eliminating any potential impacts to the associated cultural resources from the training within the range itself. The overall size of the Explosives Training Range (1 hectare [2.5 acres]), combined with the size of the ammunition and the distance from the range boundary, where the proposed detonations would occur, would result in a very low likelihood that ricocheted materials would reach the surface danger zone.”

The DEIS underestimates the potential adverse effects of live-fire training on Tinian’s cultural, historical, and environmental resources. While the document asserts that the design of the range and use of small-caliber ammunition will minimize physical impacts, this narrow assessment fails to account for the cumulative, indirect, and non-material consequences of sustained military activity.

The DEIS focuses primarily on structural thresholds, such as decibel levels required to cause physical damage to buildings, but disregards the broader implications for cultural landscapes and Traditional Cultural Properties (TCPs). Many of these sites hold spiritual and ancestral value to Indigenous Chamorro and Refaluwasch (Carolinian) communities, where impacts cannot be fully measured by material harm alone. Repeated noise, vibration, and exclusionary access measures may erode the integrity and sanctity of these areas over time, even in the absence of visible structural degradation.

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Furthermore, the assumption that munitions entering coastal waters pose negligible risk is speculative and unsupported by site-specific impact modeling. Submerged cultural resources and sensitive marine ecosystems could still be at risk from metallic debris, chemical contamination, and physical disturbance, particularly over the long term. The DEIS does not adequately evaluate these risks nor does it propose any monitoring or mitigation measures for underwater impacts.

Particularly in light of historical and ongoing militarization in Guam and the Northern Mariana Islands, the conclusion that impacts would be “less than significant” is a statement with weakened credibility.

#### Page 4-51

“Public access within the area of potential effects would be limited during some training events, as required to preserve public safety. The proposed range design has considered the importance of public access to cultural resources, including the North Field National Historic Landmark and three identified traditional cultural places. To minimize effects, several key range components were sited in areas to lessen access restrictions. For example, the Multi-Purpose Maneuver Range surface danger zone originally overlapped the North Field National Historic Landmark Atomic Bomb Loading Pits. The placement of the range was redesigned so the surface danger zone would not overlap this feature, thereby lessening access restrictions that would apply to the North Field National Historic Landmark when live-fire training occurs. Additionally, as described earlier in this section, the area of potential effects would be divided into eight distinct training areas that can be closed individually or in groups as required to preserve public safety from certain training activities. This allows for the remainder of the training areas to remain safely open to the public even while training activities may be occurring. An on-island Range Control office would actively engage with the CNMI and Municipality of Tinian to avoid scheduling training on holidays, festivals, or other important days when public access within the Military Lease Area is desired.

Range Control would provide notification to the public in advance of training that requires temporary access controls to maintain safety. These notifications would include information on the dates, times, and locations of planned closures so the public can plan to access areas within the Military Lease Area accordingly. Thus, access limitations to cultural resources of community and public importance would be temporary and minimal, and the above measures would further minimize potential impacts from training. As a result of additional avoidance and minimization efforts described above, impacts to cultural resources would be less than significant under Alternative 1. The potential for impacts would be further reduced through interpretive mitigation measures included in the construction programmatic agreement, especially the virtual tour, which would provide the community and visitors with an additional way to learn and engage with the cultural resources.”

The claim that access limitations to cultural resources would be “temporary and minimal” is misleading and fails to account for the cumulative, long-term impacts that restricted access would have on the cultural and spiritual connection that Chamorro, Refaluwasch (Carolinian) and other local communities maintain with these places. While measures such as range redesign and

selective closure of training areas appear to reduce immediate physical overlap with cultural sites, the broader implications of recurrent and indefinite access restrictions, particularly in a landscape of immense cultural and historical value, are inadequately addressed.

The framing of these impacts as “less than significant” under Alternatives 1 and 2 downplays the non-physical dimensions of cultural significance, including ritual access, oral tradition, and intergenerational knowledge transfer—all of which depend on uninterrupted, respectful, and autonomous access to cultural landscapes. Even temporary closures can disrupt cultural practices tied to specific times of year, or traditional observances not easily rescheduled around military convenience. There is no indication that the communities who use these sites were substantively involved in defining what constitutes “important days” or determining the adequacy of proposed access protocols.

The role of Range Control in managing access raises additional concerns about military authority acting as gatekeeper to culturally significant spaces. Even with scheduled notifications and a commitment to coordinate around local holidays, this dynamic risks institutionalizing barriers to access that are antithetical to the free exercise of cultural and spiritual life. Furthermore, a notification system, even if well intentioned, does not compensate for the effect that militarization and unpredictable closures may have on community use and cultural continuity.

Finally, the assertion that interpretive mitigation measures such as a virtual tour will “further reduce” the impact on access is fundamentally flawed. Virtual engagement cannot substitute for embodied, place-based relationships with sacred and historical sites. It represents a displacement of cultural practice, not a preservation of it.

In conclusion, the proposed measures do not constitute adequate mitigation under federal cultural resource protection frameworks, nor do they honor the spirit of Indigenous consultation, sovereignty, or cultural preservation. The assessment of impacts as “less than significant” reflects a narrow and inadequate view of cultural resource impacts that fails to meaningfully account for community concerns, cultural context, or long-term consequences. These significant impacts should be further discussed and addressed. For example, an open public discourse with a questions and answer session amongst knowledgeable local leaders and community members for DoD to further understand cultural importance of sites and preserving the integrity of the islands’ natural environment.

## **Page 4-5.2**

### **4.5.3.2**      *Construction*

“To avoid impacting cultural resources to the maximum extent possible, the USMC has sited construction components to avoid locations where cultural resources or contributing features are present. When impacts could not be avoided, locations were selected in areas containing the

least amount of known cultural resources or contributing features in order to minimize impacts. The potential for direct impacts from construction activities may include ground disturbance (i.e., excavating, filling, grubbing), vegetation removal, vibrations from the use of construction equipment, or changes in setting through visual and audible intrusions to characteristics that are important to the significance of the cultural resources. There are aspects of the Proposed Action that would necessitate an assessment of effects under alternate Section 106 procedures when designs are finalized. These alternate procedures are included in the construction programmatic agreement and the activities include collaborative and conservation efforts with the CNMI and Municipality of Tinian such as firefighting and security, and the installation of water wells to support the expeditionary Base Camp.”

The discussion in Section 4.5.3.2 minimizes the severity and extent of cultural resource impacts by framing them primarily in terms of avoidance of “known” resources and asserting that construction elements have been sited to “the maximum extent possible” to avoid those locations. However, this approach over-relies on existing surveys and assumptions of completeness, despite the well-documented limitations of cultural resource inventories, particularly in areas where subsurface or intangible heritage elements may not yet be identified.

Selecting construction sites based on “least amount of known resources” is an inherently reactive and data-deficient mitigation strategy that risks inadvertently damaging or destroying unrecorded features or landscapes of cultural value, especially in an island context like Tinian, where oral tradition and lived community knowledge often reveal important cultural resources that are not visible on the surface or documented in Western-style surveys.

The acknowledgment of impacts such as ground disturbance, vegetation removal, vibration, and visual/auditory intrusions is appropriate, but the mitigation framework does not fully recognize that cultural landscapes are holistic and interconnected. Fragmenting these landscapes through construction, even if done at “minimized” levels, results in significant degradation of setting, context, and cultural continuity. These changes can alter the spiritual, ceremonial, and narrative functions of places that may not contain built features but are still central to Chamorro and Refaluwasch (Carolinian) identity and heritage.

Additionally, the reference to future use of “alternate Section 106 procedures” once final designs are available raises serious procedural concerns. This phrasing suggests a deferment of full compliance, relying on programmatic agreements to handle unresolved adverse effects after key decisions about project siting have already been made. This undermines the intent of Section 106, which requires that adverse effects be identified and considered before irreversible project commitments are made—not retroactively. Without full transparency and meaningful community consultation in the development of these alternate procedures, there is a risk of undermining trust and marginalizing local voices.

Finally, the inclusion of firefighting, security, and water well construction as “collaborative and conservation efforts” does not directly mitigate cultural impacts. While these may offer logistical

or public safety benefits, they do not substitute for substantive preservation or restorative NHPA actions for affected cultural sites. Their mention here appears to conflate basic infrastructure needs with mitigation responsibilities under NHPA and NEPA, diluting the focus on cultural preservation.

In summary, this section presents an overly technical and minimalist view of mitigation, fails to meaningfully engage with Indigenous and community-based understandings of cultural significance, and risks allowing construction to proceed with incomplete or insufficient protections for cultural resources.

#### 4.6 Visual Resources

##### Page 4-56

“Five specific key observation points on Tinian (Figure 4.6-1) were selected from the seventeen viewpoints identified in Section 3.6 as representative locations for the development of visual simulations.”

37L First, the use of only **five Key Observation Points** from the originally identified seventeen viewpoints is overly narrow and may not adequately represent the diversity of experiences across the island. This reduction omits critical cultural, historical, and recreational areas that may have equal or greater visual sensitivity than those selected. The process does not explain the rationale for excluding the twelve other viewpoints or how public, Indigenous, or local stakeholder input informed their selection.

37T Second, while the viewshed analysis incorporates basic geographic variables (elevation, vegetation, etc.), it does **not appear to integrate cultural landscapes or Indigenous visual perspectives**, which are critical to understanding how land, seascape, and sky are perceived in a place-based context. For example, many sacred and culturally significant sites on Tinian—such as coastal cliffs, caves, and ancestral paths—may not be visually prominent in a western scenic framework, but still hold deep meaning that would be disrupted by militarized alterations to the horizon, vegetation, or soundscape.

37L Third, the analysis separates short-term construction impacts from long-term operational changes but **fails to quantify or meaningfully analyze the cumulative visual degradation** over the anticipated 10 to 15 years of continuous development. The impact of repeated, large-scale construction efforts, coupled with permanent range infrastructure and restricted public access, may fundamentally alter the visual character of the island over time, even if individual stages appear moderate in isolation.

Lastly, the visual assessment appears to prioritize aesthetic disruption in terms of contrast and form but **does not evaluate how these changes could affect the psychological, spiritual, or**

37L | **tourism-related experiences** tied to iconic views like Mount Lasso or Ushi Point. The absence of a visual impact threshold based on community or cultural sensitivity weakens the integrity of the "less than significant" impact conclusion. Meaningful community outreach and consultation would enable a thorough analysis of these important — and potentially significant — impacts on both local residents and the tourists who remain vital to the economy.

#### 4.7 *Transportation*

##### **Page 4-65**

37K | Analysis in this section completely fails to consider the impacts of the proposed action on water and air travel for community members in the CNMI. Traveling to and from Tinian by boat or plane is already challenging, and the addition of “danger zones” will likely have impacts that are most significant to lower income residents for whom an extra few miles of boat transit or a missed plane connection can have tremendous impacts. Additional analysis regarding vulnerable populations, including subsistence fishermen and the sailing community, should be provided here. To mitigate what will likely result in increased costs and less frequent flights, DoD should consider offering financial or logistical support to the CHCC for “medical referral” patients from Tinian who may be more likely to miss appointments or be unable to receive care when Range Control activities impact flight schedules between Saipan and Tinian airports.

#### 4.8 *Noise*

##### **Page 4-76**

37S | We recommend that until a scientific study on the impacts of noise on humans and animals from the last decade of *military exercises on Tinian* be completed and shared with the general public through the CNMI’s Bureau of Military Affairs or any other broad public news outlet, that the ‘No Action’ Alternative be chosen. Without a valid study looking at this unique demographic and its denizens it is the only defensible alternative to be taken.

##### **Page 4-93**

“Overall, the proposed training in the Military Lease Area, live-fire and aviation training, would generate elevated noise levels compared to the No Action Alternative. Based on the cumulative and single event noise levels described above, there may be some temporary disturbance to recreational users or 4-93 Revised Draft CNMI Joint Military Training EIS June 2025 Chapter 4 Environmental Consequences individuals engaged in ranching and grazing in the Military Lease Area, but these effects would be limited in duration and scope.”

37S | This conclusion does not include any data on noise impacts to the public or fauna over time. These exercises are not temporary, as proposed they are ongoing. DoD failed to conduct any

studies over the past decade of ongoing exercises on the human population. This shows a lack of diligence on the part of DoD and the authors of this DEIS.

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No analysis has been provided on the physical and psychological impacts of noise created by these exercises on the population's state of mind, especially those highly susceptible to trauma, veterans, and children during their developmental stages of growth. Military planes flying overhead, the presence of guns, and live-fire is jolting even to those not having experienced previous trauma. This lack of study is indefensible given that DoD is basing their chosen alternative on noise in decibels and not on the overall experience of ongoing exposure.

**Page 4-96**

"Thus, aircraft training under Alternative 2 would be likely to produce annoyance and not expected to result in interruptions to conversations or indoor speech, or classroom learning on Tinian or Saipan."

DoD has provided no data to support the assumption that conversations, or classroom learning would not be impacted. This conclusion is indefensible.

**4.9 Air Quality**

**Pages 4-99 to 4-101**

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The *air quality analysis* presented in Section 4.9 has several significant shortcomings that limit its reliability and thoroughness. First, to dismiss health risks associated with live-fire training emissions by relying on a nearly two-decade-old study by the Agency for Toxic Substances and Disease Registry (2003) is problematic. Given changes in training intensity, weaponry, and potential cumulative effects, an updated, site-specific quantitative analysis is necessary to accurately assess impacts. The use of emission factors derived from the US Virgin Islands as a proxy for the CNMI further compounds uncertainty, as differences in local meteorology, fuel types, and operational conditions may result in inaccurate emission estimates. Moreover, the analysis treats construction and operational emissions separately without evaluating their cumulative effects over the multi-year project duration, neglecting the potential for peak pollutant concentrations and prolonged exposure for sensitive populations. Although greenhouse gas emissions are estimated, the report falls short of addressing their broader climate change implications or proposing mitigation strategies. Additionally, the analysis inadequately considers sensitive receptors and environmental justice concerns, lacking a detailed assessment of vulnerable communities potentially disproportionately affected by emissions. The assumption that Easterly trade winds consistently transport pollutants away from populated areas is overly simplistic, ignoring possible seasonal or meteorological variations that could increase exposure risks. Crucially, the exclusion of quantitative air quality modeling for hazardous emissions from live-fire munitions and the proposed incinerator undermines the ability to

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**37M** | evaluate potential localized “hot spots” of toxic pollutants. Overall, the analysis requires updated data, comprehensive cumulative impact modeling, incorporation of localized emission factors, environmental justice evaluation, and robust mitigation planning to ensure a more accurate and protective assessment of air quality impacts associated with the Proposed Action.

#### 4.10 *Public Health and Safety*

##### **Page 1-111**

Under the ‘No Action’ alternative, “Additionally, projects under the Air Force’s Agile Combat Employment program would proceed, including vegetation clearance and restoration of the runway and other engineered surfaces at North Field, which would improve roadways used for public access and benefit public health and safety.”

DoD does not explain the rationale behind associating vegetation clearing with public health and safety. The clearing is occurring in the North Field; how does this benefit the health and safety of Tinian residents? Residents have always had access to the MLA without such ‘improvement’. How does less vegetation equal public health and safety? Please substantiate this claim with supporting data.

#### 4.11 *Utilities*

##### **Page 4-118**

“Under Alternative 2, training would continue and would increase over the No Action Alternative by approximately 5 percent, which is approximately 10 percent less than Alternative 1. All of the same precautions associated with Alternative 1, including that all scheduled training events would be coordinated and communicated through Range Control, would result in a less than significant impact to public health and safety from Alternative 2.”

“This analysis uses quantitative and qualitative assessments of changes to utilities capacity to determine the potential for training events and construction of the Proposed Action to exceed existing utility capacity or to disrupt existing utilities’ services.”

Unfortunately, the DoD has failed to think beyond their fence, and their own needs. To truly benefit all parties, military personnel, and the general public of Tinian, DoD should work together with the CNMI Government and its agencies to leverage available funding and resources to build up new and improved infrastructure for all. This would further the DoD’s joint mandates of ensuring preparedness as well as peace and security.

Instead, DoD proves to be an unsuccessful planner for the future. This includes wasting valuable time over the past 10 years by not conducting studies on human impacts from the past WWII activities and recent exercise and by relying on old FEMA maps, 50 to 100-yr storm events, and

other outdated data that has not taken into account the most recent Climate change impacts. Where are new GIS data to include present utility needs and those that predictively will certainly be needed in the future?

#### 4.13 Groundwater and Hydrology

##### Page 4-142

“Increased groundwater pumping could potentially lead to saltwater intrusion into the freshwater aquifer, causing chloride concentrations to increase. The Commonwealth Utilities Corporation water system reports that existing chloride concentrations in Tinian’s groundwater supply ranged from 145 and 213 milligrams per liter between 2012 and 2023 (Commonwealth Utility Corporation 2013, 2014c, 2015a, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023 and 2024a). This remains below the secondary maximum contaminant level for chloride of 250 milligrams per liter adopted by the CNMI Bureau of Environmental and Coastal Quality for contaminants that are not considered a risk to public health (CNMI Drinking Water Regulations, Chapter 65-20).”

Although secondary maximum contaminant levels for chloride are not enforceable, they do make water unpalatable and corrosive to faucets and other metal plumbing fixtures. The level of 213 mg/L is also detrimental to plant growth, and will kill grass and other vegetation.

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Moreover, noting that CUC uses one sole source aquifer for Tinian’s municipal public water supply, analysis of the significance of proposed increases in water extraction is incomplete without a full accounting of the water budget for current use and future trends. Similar to Chapter 3, critical ecological and legal analysis is lacking in this section. The sole source hydrology / geology should be clearly acknowledged. Additional analysis should reflect what right(s) if any the DoD currently has or wishes to pursue to obtain groundwater under the current lease, again Public Law 06-12.

“As described in Section 3.13, the average annual recharge of Tinian’s aquifers is estimated at 20 billion gallons per year.”

##### Page 4-141

While Table 4.13-2 details current average demands, supply is not discussed in detail. Section 3.13.1 notes an “approximately 20 billion gallons per year of recharge” but also discusses how “most of the fresh groundwater slowly discharges naturally from springs around the perimeter of the island and submarine coastal springs.” Seepage has been documented on Saipan, but is not well studied on Tinian, so assuming 20 billion gallons of recharge means 20 billion gallons of available water is problematic as it does not account for losses due to the island’s karst limestone geology.

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Please clarify, what is the current carrying capacity of Tinian’s sole freshwater lens, and how was this calculated? Please clearly specify assumptions and acknowledge data gaps if seepage rates or estimates for Tinian are not available. How was the “sustainable yield” of the **sole source** groundwater aquifer calculated? How will changes in land use, sea levels, and precipitation likely affect this calculation for the lifetime of this proposed action?

#### 4.14 Surface Waters and Wetlands

##### Page 4-144

“Live-fire training operations at the Multi-purpose Maneuver Range and the Explosives Training Range would have the potential to impact surface waters or wetlands by introducing residual heavy metals such as lead into the environment. However, the potential impact is small due to several factors including the relatively large distances between the live-fire ranges and surface waters and wetlands as shown in Table 4.14-1; the generally flat and rolling terrain; and general absence of surface waters and wetlands on Tinian (Figure 4.14-1).”

This figure shows that a portion of the Mahalang Complex would not be in a wetland protected zone. Therefore, the potential for heavy metals into this area is evident. This area should be totally encompassed by a wetland protected area.

“The USMC would be responsible for cleaning up after its own activities to the maximum extent practicable, but not for remediating legacy issues in the Military Lease Area, such as World War II-era munitions.”

While we are aware that current protocols do not require the DoD to take action unless deemed



necessary under its own standards, it is unfortunate given the amount of legacy UXO found near residential and frequently visited recreational areas. For example, UXO has been discovered in a wetland adjacent to the Mariana Islands Housing Association (MIHA) housing in Garapan, as well as in streams within the Achugao watershed, as documented in 2022 CNMI 305(b) and 303(d) Integrated Water Quality Assessment Report. Tinian, in



particular, has numerous additional sites where legacy munitions remain of concern (see also comment referring to **Page 3-76**, Section 3.10.4 *Unexploded Ordnance and Discarded*

*Military Munitions* above). Why would the very organization tasked with providing national security and defense not feel obligated to secure and defend Tinian’s inhabitants from life threatening UXO by removing them, even if the MIC is not mandated to do so?

#### 4.15 Cumulative Impacts

Please see UXO images in 4.14 above.

#### Page 4-148

“Cumulative impacts result when the effects of an action are added to or interact with other effects in a particular place and *within a particular time*. It is the combination of these effects that is the focus of cumulative impact analysis. While impacts can be differentiated by direct, indirect, and cumulative, the concept of cumulative impacts takes into account all disturbances since cumulative impacts result in the *compounding of the effects of all actions over time*.”

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DoD failed to define “particular time” in contrast to “all actions over time”. This means that DoD does not include past actions in the definition of cumulative impacts, but as shown in the images above past military actions have a lingering (and when not mitigated or removed) have a permanent impact on public health and safety. Therefore, we recommend using “effects of all actions over time”, as the defensible definition of cumulative impacts for the proposed military actions in this DEIS.

#### 4.15.3 Socioeconomics

#### Page 4-152

“Temporary activation of surface danger zones in waters north of Tinian during live-fire training at the Multi-Purpose Maneuver Range could significantly affect fishing and boating under the Proposed Action. Military activities that temporarily limit access to popular fishing, recreational, or cultural sites as part of the Proposed Action would be communicated to the public in advance of events to allow time for alternate plans to be made, and Range Control would continue to work with the CNMI and Tinian Municipality to avoid and minimize impacts related to public access within the Military Lease Area, consistent with safety protocols. None of the reasonably foreseeable future actions listed in Table 4.15-1 would have the potential to incrementally increase or exacerbate these potential impacts. If multiple construction projects were to occur simultaneously, a temporary shortage of hotel rooms for workers could occur. Current and reasonably foreseeable projects would have slight impacts on public services due to the associated population increases. Population increases would increase demand for public services such as medical, law enforcement, and firefighting services. These services, particularly medical care, may not be able to manage additional demand adequately during periods of simultaneous project construction.”

Acknowledging that temporary activation of Surface Danger Zones (SDZs) north of Tinian will significantly affect fishing and boating is appropriate, yet the mitigation measures described rely heavily on advance public notice and coordination. This approach is insufficient given the cultural and economic importance of fishing and marine access to local residents, many of whom depend on these resources for subsistence and livelihood. Temporary restrictions, even if communicated in advance, can disrupt traditional practices and create ongoing uncertainty that is not fully addressed.

Moreover, the discussion underestimates the potential for cumulative impacts. While it notes minor impacts on public services and the possibility of hotel shortages during overlapping construction projects, the analysis does not thoroughly consider how simultaneous or extended disruptions could exacerbate existing strains on local infrastructure, emergency response capacity, and community well-being.

The suggestion that some projects will have indirect positive socioeconomic effects, such as port improvements and increased tourism, does not sufficiently balance the likely negative impacts on access to natural and cultural resources. The net minor to moderate beneficial economic impact projected may be overly optimistic without robust strategies to prevent adverse social and environmental consequences from recurring or simultaneous disruptions.

Overall, the section lacks a comprehensive risk assessment of cumulative and cultural impacts related to temporary access restrictions and resource availability. Stronger mitigation commitments and contingency plans are needed to ensure equitable protection for residents' traditional uses and public services during periods of military activity.

## 5 REFERENCES

As a general concern, there are numerous references that are not accessible or are “request for information responses” that do not appear to be publicly available. Here are our references for easy accessibility for our readers.

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## 6 ACRONYMS and their meaning

**BECQ** - Bureau of Environmental and Coastal Quality

**CHCC** - Commonwealth Health Care Corporation

**CNMI** - Commonwealth of the Northern Mariana Islands

**CUC** - Commonwealth Utility Corporation

**DoD** - Department of Defense, Pentagon, the military responsible for budgetary oversight of the Military Industrial Complex

**Exercise** - War maneuvers, war training, war exercises

**FAA** - Federal Aviation Administration

**FEMA** - Federal Emergency Management Agency

**Footprint** - location of military occupation, military bases and forces

**FPIC** - Free, Prior, and Informed Consent

**GIF** - Geographic Information System

**JRM** - Joint Region Marianas

**MIC** - Military Industrial Complex

**MIHA** - Mariana Islands Housing Association

**MLA** - Military Lease Area

**NEPA** - National Environmental Policy Act

**NHPA** - National Historic Preservation Act

**NOAA** - National Oceanic and Atmospheric Administration

**NRHP** - National Register of Historic Places

**NAVFAC** - Naval Facilities Engineering Systems Command

**PTSD** - Post-Traumatic Stress Disorder

**Service Members** – Soldiers, military personnel, and civilians employed by or working for the U.S. military across its various branches.

**SDZ** - Surface Danger Zones

**UXO** – Unexploded Ordnance

**UNDRIP** - United Nations Declaration on the Rights of Indigenous Peoples

**USAGM** - United States Agency for Global Media

**USMC** - United States Marine Corpse

**USDA** - United States Department of Agriculture

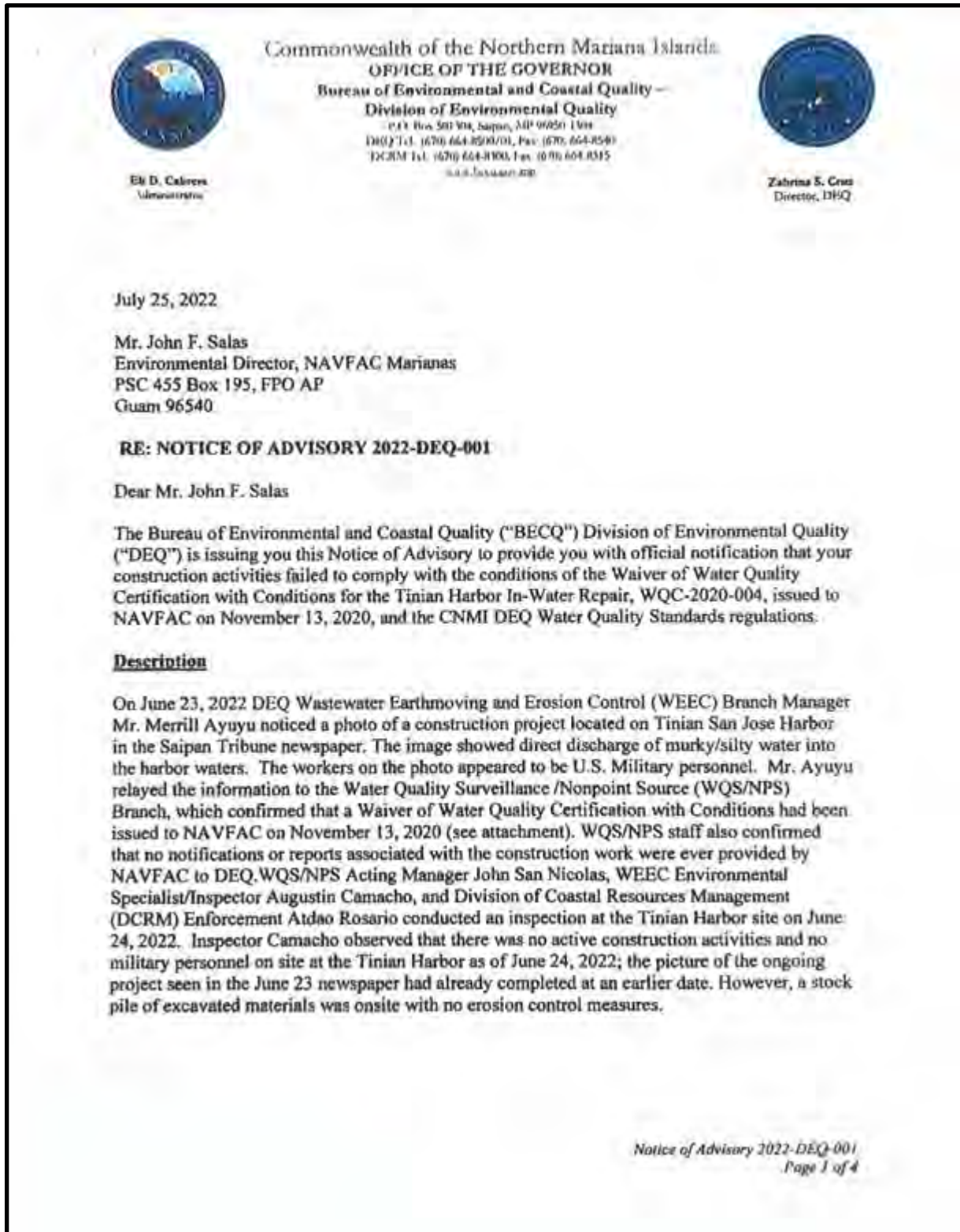
**USFWS** - United States Fish and Wildlife Service

**TNI** - Francisco Manglona Borja / Tinian International Airport

**TCP** - Traditional cultural properties

**WQS** - Water Quality standards

7 ENCLOSURES



### Findings

Based on the impacts to water quality evident from the published photograph, DEQ's record review, and the June 24 site inspection, BECQ has determined that NAVFAC violated the CNMI DEQ Water Quality Standards regulations, specifically:

1. **Water Quality Standards NMIAC § 65-130-435 Turbidity** – states “Turbidity values (NTU) at any point shall not exceed 1.0 NTU over ambient conditions.” This standard is applicable to Class A waters. As per NMIAC § 65-130-205(b) Tinian & Aguigan, this includes the coastal waters known as San Jose Harbor.
  - The discharge as seen in the Saipan Tribune photo shows substantial turbidity well above that seen in the water outside of the sediment plume (see Figure 1).
  - The observed turbidity is significantly higher than the 1.0 NTU value documented by the DEQ surveillance laboratory turbidity calibration (see Figure 2).
2. **Water Quality Standards NMIAC § 65-130-605(c) Application for Water Quality Certification** – states “The applicant is required to notify BECQ, in writing, of changes which may affect the application and certification process.”
  - As per the applicant's Water Quality Certification Application, it was stated in *Section 4a) Location(s) at which discharge may enter CNMI waters*, that “no discharge anticipated” for both the Tinian Harbor In-Water Repair Project and the Tinian Harbor Topside Repair Project.
  - BECQ did not receive notice of changes that affected the application and certification waiver, prior, during, or after discharge has occurred.

In addition, BECQ has determined that NAVFAC failed to comply with the conditions in the Waiver of Water Quality Certification with Conditions, as follows:

3. **Waiver of Water Quality Certification with Conditions** – Condition 2 requires: “All Protective Measures and BMPs listed in Appendix A of the Section 401 Water Quality Certification Application – Supplemental Information for Tinian Harbor Repairs submitted to BECQ by NAVFAC shall be followed. This includes the use of a silt curtain for all in-water work to capture and prevent impacts to water quality.”
  - No BMPs or silt curtains were in place to prevent stock piled debris from entering the harbor.
4. **Waiver of Water Quality Certification with Conditions** – Condition 3 states “For One (1) week prior to construction, the permittee shall establish daily baseline ambient turbidity levels following tidal changes at monitoring sites along a transect where sheet pile repair activities are expected to occur, as well as at a control site at a similar location away from the construction site. A report containing baseline ambient turbidity levels shall be submitted to BECQ prior to commencing construction.”
  - NAVFAC failed to establish ambient water quality conditions one week prior to commencing work. A report was never provided to DEQ.

*Notice of Advisory 2022-DEQ-001  
Page 2 of 4*

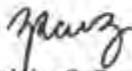
5. **Waiver of Water Quality Certification with Conditions** - Condition 4 states "Anytime that turbidity levels exceed CNMI WQS for turbidity during sheet pile repair, work shall cease for at least a 30-minute period, or until subsequent water quality monitoring with a turbidimeter shows that turbidity levels have returned to <1.0 NTU greater than the ambient levels measured at the control site."
- \* The turbidity level did exceed the CNMI WQS for turbidity, and there is no indication that work ceased as required.

**Advisory**

Pursuant to Commonwealth Environmental Protection Act, 2 CMC § 3131, and the Water Quality Standards, NMIAC § 65-130, you are hereby advised that future violations of the Water Quality Standards and/or failure to comply with the requirements of Waiver of Water Quality Certification with Conditions may result in enforcement action.

If you have any questions regarding this Notice of Advisory, contact Zabrina Cruz at (670) 664-8500/35.

Sincerely,



Zabrina S. Cruz  
Director, DEQ



Eli D. Cabrera  
Administrator, BECQ

Notice of Advisory 2022-DEQ-001  
Page 3 of 4

Figure 1 Saipan Tribune photo 220609-N-W11304-0419



Figure 2 DEQ surveillance laboratory turbidity calibration standards 1.0-1000 NTU



Notice of Advisory 2022-DEQ-001  
Page 4 of 4

## Comment 38

### Commentor Information

Name	Organization / Affiliation	Comment Format
Name Redacted	CNMIGA.ORG	website

*Legend: N/A = not provided*

### Text of Comment

PLEASE, READ MY ARTICLE AT THIS LINK: <https://www.cnmiga.org/post/open-letter-to-secretary-of-defense-pete-hegseth-usindopacom-joint-region-marianas-navfac-marianas>

## Comment 39

### Commentor Information

Name	Organization / Affiliation	Comment Format
Name Redacted	CNMI Office of the Governor	website

*Legend: N/A = not provided*

### Text of Comment

Letter of Request for Extension of Commend Deadline - Revised Draft Environmental Impact Statement for the CJMT

[Text of comment begins on the following page]



**David M. Apatang**  
Governor

**Dennis James "DJ" C. Mendiola**  
Lieutenant Governor

COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS  
**OFFICE OF THE GOVERNOR**

August 6, 2025

GOV2025-052

CJMT Project Manager  
Naval Facilities Engineering Systems Command, Pacific  
c/o AECOM  
415Chalan San Antonio Road, Suite 112  
Baltej Pavilion Building  
Tamuning, Guam 96913  
Via U.S. Mail and Electronic Submission:  
[www.CNMIJointMilitaryTrainingEIS.com](http://www.CNMIJointMilitaryTrainingEIS.com)

**Re: Request for Extension of Comment Deadline – Revised Draft Environmental Impact Statement for the Commonwealth of the Northern Mariana Islands Joint Military Training (CJMT)**

Dear CJMT Project Manager:

I write as the newly sworn-in Governor of the Commonwealth of the Northern Mariana Islands (CNMI) to respectfully request an extension of the public comment deadline for the Revised Draft Environmental Impact Statement (RDEIS) for the CNMI Joint Military Training (CJMT), currently due on **August 20, 2025**.

As you are aware, I assumed office on **July 24, 2025**, following the tragic and unexpected passing of Governor Arnold I. Palacios. This abrupt transition of leadership has required my administration to focus on ensuring government continuity while honoring the legacy of our late Governor.

39A Given the importance and complexity of the proposed CJMT project – particularly its implications for land use, environmental stewardship, cultural preservation, public access, and our limited natural resources – my administration needs additional time to thoroughly review the Revised Draft EIS and meaningfully consult with local stakeholders, agencies, and affected communities.

The Revised Draft EIS reflects significant changes from the original 2015 proposal, including modifications to training locations, infrastructure, and environmental safeguards. Despite the U.S. Marine Corps' efforts at interagency consultation and public outreach, this is the first opportunity for the CNMI's newly constituted executive leadership to formally review and respond to the full scope of the proposed action.

39A

Accordingly, we request and **extension of at least 60 days**, until **October 21, 2025**, to allow for a responsible and well-informed review of the RDEIS. This extension would uphold the spirit and intent of the National Environmental Policy Act (NEPA), ensuring that potentially significant environmental and social impacts are properly assessed in coordination with local leadership and the public.

We appreciate your consideration of this request and look forward to continuing our constructive engagement on these important matters of mutual interest.

Sincerely,



**DAVID M. APATANG**  
Governor  
Commonwealth of the Northern Mariana Islands

Cc: Dennis James C. Mendiola, CNMI Lieutenant Governor

## Comment 40

### Commentor Information

Name	Organization / Affiliation	Comment Format
Jose Kiyoshi	Tinian Resident and concern individual	website

*Legend: N/A = not provided*

### Text of Comment

<https://www.cognitofrms.com/forms/public/file?id=F-g6Ff0nEL!oCg8HZLwuRZPE&sessionToken=Vem%2BbkESfyRgcDLeELG4MB0rrgfiWPYtsqt74S1Xch4glEaclocVC71tni8WepyLvaZA3nGEzmYwclWL6Z5OAYRMCcruhIT6d%2Bh4FUdqXJrdHTAq&ct=image%2Fpng>

[Attachment contained no additional text (blank page)]

## Comment 41

### Commentor Information

Name	Organization / Affiliation	Comment Format
Name Redacted	N/A	website

*Legend: N/A = not provided*

### Text of Comment

See Attached PDF File for Comments

**DATE:** August 7, 2025

**TO:** The Commonwealth Bureau of Military Affairs & U.S. Marine Corps

**SUBJECT:** Critical Analysis of the CJMT Revised Draft Environmental Impact Statement (RDEIS) in Relation to CNMI Comprehensive Sustainable Development Goals

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## Executive Summary

41A

The Commonwealth of the Northern Mariana Islands (CNMI) Comprehensive Sustainable Development Plan (CSDP) outlines a vision for long-term, community-centered development rooted in balanced economic growth, environmental stewardship, cultural preservation, and equitable land use. Upon critical review of the Revised Draft Environmental Impact Statement (RDEIS) for the CNMI Joint Military Training (CJMT), we find that the proposed military activities under Alternatives 1 and 2 are fundamentally misaligned with the CSDP's goals.

The RDEIS presents a range of direct and indirect impacts that compromise CNMI's environmental sustainability, cultural heritage, economic independence, public access rights, and climate resilience. This submission outlines these areas of conflict and proposes recommendations to realign federal actions with the sustainable future envisioned by the people of the CNMI.

---

## 1. Environmental Stewardship

**CSDP Goal:** Sustainably manage ecosystems, biodiversity, and land/water resources.

### CJMT Conflicts:

41B

- Significant land clearing for training infrastructure and range development within or adjacent to conservation areas (Section 4.2; Figures 4.2-2, 4.2-3).
- Impacts to endangered species such as the Mariana fruit bat and green sea turtles due to live-fire training and habitat disruption (Section 4.4; Tables 4.4-2, 4.4-5).
- Increased air emissions, noise pollution, and risk of erosion from explosives and vehicle activity (Section 4.8, 4.9, 4.12).

**Conclusion:** These actions violate the CSDP's commitment to environmental resilience and threaten both terrestrial and marine ecosystems.

41C

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## 2. Cultural Preservation

**CSDP Goal:** Protect sacred sites, historical landmarks, and indigenous cultural practices.

**CJMT Conflicts:**

- Restricted or delayed access to sacred sites such as Puntan Taddong and foraging zones during training periods (Section 4.1.3.1; Section 4.5).
- Degradation of the visitor experience at historical sites like the North Field National Historic Landmark due to noise and military presence (Section 4.6).

**Conclusion:** The current mitigation measures are insufficient to safeguard cultural continuity and violate the spirit of community self-determination and heritage protection.

---

## 3. Community-Based Economic Development

**CSDP Goal:** Promote local economic opportunity, particularly in tourism, fishing, and agriculture.

**CJMT Conflicts:**

- Temporary closures of coastal and land areas interfere with tourism events (e.g., San Jose Fiesta) and recreational fishing (Section 4.1.3.1).
- Access restrictions and safety zones in nearshore waters disrupt commercial and subsistence fishing, increasing operational costs (Section 4.3.3.1).
- Local employment gains (30–50 staff) are marginal and spread over 10–15 years (Section 4.3.3.1).

**Conclusion:** The project imposes disproportionate economic costs on local livelihoods while offering limited economic returns.

---

41D

## 4. Public Access and Equity

**CSDP Goal:** Ensure fair and inclusive access to public lands.

**CJMT Conflicts:**

- Entire Military Lease Area becomes intermittently inaccessible to the public, undermining civil land use rights (Section 4.1).

41D

- Access to recreation, memorials, and cultural resources dictated by military training schedules, not community needs.

**Conclusion:** The militarization of public lands without enforceable community protections creates structural inequity and contradicts CNMI’s land justice principles.

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## 5. Climate Resilience and Infrastructure Sustainability

**CSDP Goal:** Advance infrastructure that enhances climate resilience and conserves natural resources.

### **CJMT Conflicts:**

41E

- Construction and training increase GHG emissions and place additional pressure on CNMI’s water supply systems (Section 4.9, 4.11, 4.13).
- Potential for land disturbance and erosion in fragile karst environments (Section 4.12).

**Conclusion:** The project undercuts CNMI’s climate adaptation priorities and weakens its long-term environmental stability.

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## Final Assessment

The CJMT Revised Draft Environmental Impact Statement fails to adequately support or align with the CNMI Comprehensive Sustainable Development Plan. The proposal prioritizes federal military utility at the expense of local environmental integrity, cultural survival, and economic sovereignty. While mitigation strategies are discussed, they are largely advisory and contingent on military discretion.

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## Recommendations

1. Impose a moratorium on all new military development in CNMI until a locally-led, cumulative impact study is conducted.
  2. Establish binding co-management agreements between the Department of Defense and CNMI government agencies to ensure collaborative land and resource stewardship.
  3. Revise the RDEIS to integrate enforceable sustainability criteria grounded in the CNMI CSDP.
- 

## References (from CJMT RDEIS)

- Section 4.1: Public Access and Training Impacts
  - Section 4.2: Land Use and Recreation
  - Section 4.3: Socioeconomics
  - Section 4.4: Biological Resources
  - Section 4.5: Cultural Resources
  - Section 4.6: Visual Resources
  - Section 4.8: Noise
  - Section 4.9: Air Quality
  - Section 4.11: Utilities
  - Section 4.12: Topography, Geology, and Soils
  - Section 4.13: Groundwater and Hydrology
-

## Comment 42

### Commentor Information

Name	Organization / Affiliation	Comment Format
CNMI DLNR Invasive Species Program	CNMI DLNR Invasive Species Program	website

*Legend: N/A = not provided*

### Text of Comment

[Text of comment begins on the following page]

August 7, 2025

Public Comments on the Revised Draft Environmental Impact Statement EIS  
CNMI Joint Military Training – June 2025

Submitted by:

- CNMI Invasive Species Program, DLNR
- CNMI Division of Customs and Biosecurity
- CNMI Invasive Species Council CISC

### **Comment 1 – Invasive Species Risk Not Adequately Addressed**

Reference: Volume IIa, Appendix A-H, Table H-6, page H-25

The EIS mentions that a "biosecurity facility" is included as part of the Port of Tinian build-up to support inspections of incoming cargo. However, there is no detail provided on how this facility will be operated, staffed, or equipped to prevent the introduction of invasive species, which are a significant threat to CNMI ecosystems and agriculture.

The Final EIS should include a comprehensive Biosecurity Management Plan, developed in coordination with CNMI biosecurity agencies, and must detail:

- Inspection and decontamination protocols
- Pre-departure inspection requirements from ports of origin
- Ongoing surveillance and early detection measures for high-risk species like Coconut Rhinoceros Beetle, Little Fire Ant, and *Mucuna pruriens*

42A

### **Comment 2 – Coordination with CNMI Biosecurity Authorities Is Not Evident**

Reference: There is no substantive mention or commitment in the EIS to formal coordination or agreements with the Division of Customs and Biosecurity or the CNMI Invasive Species Council.

While the document references consultations with various stakeholders, it fails to identify any direct or formal collaboration with CNMI's lead biosecurity agencies responsible for regulating and managing invasive species threats.

DOD must establish an MOU or similar agreement with CNMI Customs & Biosecurity and the CISC, outlining shared responsibilities, data-sharing protocols, incident reporting, and enforcement authority throughout all phases of CJMT activities.

### **Comment 3 – Biosecurity Infrastructure Lacks Detail**

Reference: The EIS states that the Port of Tinian will include a “biosecurity facility” to support the increased volume of military cargo and personnel, but it does not specify:

- What inspections will be performed
- Who will be responsible for oversight
- Whether the facility will meet USDA or CNMI quarantine standards

42A

The Final EIS must include operational specifications for this facility, such as:

- Defined inspection zones
- Biosecurity waste disposal systems
- Fumigation or heat treatment capacity
- Compliance with CNMI Customs quarantine requirements

### **Comment 4 – Sensitive Habitat Areas Threatened by Training Activity**

Reference: Chapter 3 (Section 3.4), page 3-21, confirms that Lake Hagoi is a critical habitat for the Mariana Common Moorhen and is located within the Military Lease Area. Chapter 4 also mentions the Natural Resources Conservation Area (936 acres), which allows “low-impact” training but lacks clarity on enforcement.

While Lake Hagoi is "currently restricted from training activities," no permanent restriction is codified in the EIS. Additionally, the impacts of aircraft overflight, noise, and potential runoff into sensitive areas are not adequately addressed.

42B

We request:

- Legally enforceable training exclusion zones around Lake Hagoi and the Conservation Area
- Seasonal restrictions during nesting or breeding periods
- Required coordination with CNMI Division of Fish and Wildlife for monitoring

42A

### **Comment 5 – Increased Transport Operations Pose Biosecurity Risks**

Reference: Appendix H identifies increased freight movement to Tinian via barge and airlift, including construction materials, fuel, and equipment. However, there is no mention of marine invasive species management, ballast water protocols, or hull biofouling inspections.

The Final EIS must outline:

- Ballast water management protocols to prevent marine invasive introductions
- Hull inspection and cleaning requirements for all vessels before port entry
- Cargo certification policies that align with CNMI's invasive species regulations

42A

#### **Comment 6 – Cumulative Impact on CNMI Biosecurity Capacity Is Not Addressed**

Reference: The EIS asserts that cumulative environmental impacts will be “less than significant” but does not analyze how sustained increases in inspection demand, waste management, or emergency response will affect CNMI's limited biosecurity workforce and budget capacity.

The Final EIS should include:

- An impact analysis on CNMI biosecurity infrastructure
- Funding commitments or technical assistance to support local agency staffing, equipment, and training
- A cost-share strategy for expanding CNMI's invasive species detection and rapid response systems

## Comment 43

### Commentor Information

Name	Organization / Affiliation	Comment Format
Viktoriya Sirova	Department of the Interior	website

*Legend: N/A = not provided*

### Text of Comment

Please see attached comment letter. Thank you



# United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
1323 Club Drive  
Vallejo, CA 94592

August 13, 2025

IN REPLY REFER TO:  
ER 25/0345  
4111

CJMT Project Manager  
Naval Facilities Engineering Systems Command  
Pacific c/o AECOM  
415 Chalan San Antonio Road, Suite 112  
Baltej Pavilion Building  
Tamuning, Guam 96913

Subject: U.S. Department of the Interior Comments – Revised Draft Environmental Impact Statement in Support of the Commonwealth of the Northern Mariana Islands Joint Military Training Environmental Impact Statement

Dear CJMT Project Manager:

The U.S. Department of the Interior (Department), including National Park Service (NPS), has reviewed the June 2025 *Revised Draft Environmental Impact Statement [RDEIS] in Support of the Commonwealth of the Northern Mariana Islands Joint Military Training (CJMT)* prepared by the United States Marine Corps (USMC). Pursuant to the National Historic Preservation Act (NHPA) regulations (36 CFR 800.10), NPS has been participating in consultation for this project regarding the project's potential to adversely affect the Tinian Landing Beaches, Ushi Point Field, and North Field, Tinian Island National Historic Landmark, jointly referred to as the North Field National Historic Landmark (NHL). Our comments address the RDEIS's assessment of impacts pertaining to the North Field NHL.

## RDEIS Section 3.6 – Visual Resources

The NPS provides some corrections to the captions for Viewpoints 1 and 4 in Table 3.6-1 “Description of Existing Tinian Views.”

- Viewpoint 1 (pg. 3-48) depicts the Japanese Air Apron (camera facing south), not the Atomic Bomb Loading Apron and Loading Pits as stated in the second part of the caption. We provide here an accurate description of the condition of the resource. The *Tinian North Field Cultural Landscape Report* (prepared for the Department of the Navy in 2010), described the Japanese airfield surface in this area as in “fair” instead of “degraded” condition. Based on a NPS site visit in 2024, the condition does not appear to have significantly changed since 2010. It is noteworthy that damage to the paving visible in the photograph primarily consists of character-defining bomb craters and strafe marks from the U.S. invasion of Tinian in World War II. Additionally, while the perimeter of

43A

the Japanese Air Apron is overgrown with vegetation, the apron itself remains open and the visual connections and relationships between historic buildings and structures (including the air raid shelter visible in the photograph) are relatively intact in this area.

- Viewpoint 4 (pg. 3-49) depicts a portion of the Atomic Bomb Loading Apron (camera facing north) rather than the caption statement of a view from taxiways 7/8 toward the western edge of the proposed Multi-purpose Maneuver Range.

**43A** The Department recommends that the analysis of visual resources includes assessment of potential impacts to aerial views of North Field, which are identified as character-defining features in the 2010 *Tinian North Field Cultural Landscape Report* (pgs. 4-35, 4-36). The North Field NHL is also clearly visible from passenger flights between Saipan and Tinian. Including aerial views of North Field and the adjacent cultural landscape would thus be consistent with the RDEIS's stated procedure to select observation points for analysis that include "sensitive scenic and cultural resources" and that "people are accustomed to seeing as part of the general landscape" (pg. 4-56). To demonstrate potential impacts, we suggest that the RDEIS includes a "simulated conditions" rendering similar to the image from the summit of Mt. Lasso included on pg. 4-65.

#### RDEIS Section 4.5.3.2 – Construction

**43B** The Department recommends that USMC provide additional information to support the statement on pg. 4-53 that "Utility lines (i.e., electrical, communication, and water) would be installed along either side of existing roadways in previously disturbed areas." It is our understanding that no major construction or modifications have occurred along historic roadway corridors in the North Field NHL since World War II. Documentation of any such disturbance along the proposed utility lines, including when the disturbance occurred and the extent to which it may have impacted cultural resources (including archaeological resources as well as historic features associated with pre-war Japanese and U.S. World War II military construction), will help minimize the potential for unanticipated adverse effects to previously unrecorded resources. We also suggest that this be addressed in the Data Recovery and Archaeological Monitoring Plan stipulated in the draft Programmatic Agreement (Appendix H).

The Department looks forward to continuing our collaborative work with USMC in fulfilling USMC's responsibilities under both the NHPA and the National Environmental Policy Act. If you have specific questions related to our comments, please contact Christopher E. Johnson, NPS Regional Historian at [christopher\\_e\\_johnson@nps.gov](mailto:christopher_e_johnson@nps.gov). For all other questions, please contact me at [Viktoriya\\_Sirova@ios.doi.gov](mailto:Viktoriya_Sirova@ios.doi.gov).

Sincerely,

**VIKTORIYA** Digitally signed by  
**A SIROVA** VIKTORIYA SIROVA  
Date: 2025.08.13  
18:09:58 -07'00'  
Viktoriya Sirova  
Regional Environmental Officer

Electronic distribution: <https://www.cnmijointmilitarytrainingeis.com/comment.html>

cc: Melissa Stedeford, National Park Service: [Melissa\\_Stedeford@nps.gov](mailto:Melissa_Stedeford@nps.gov)  
Danette Woo, National Park Service: [Danette\\_Woo@nps.gov](mailto:Danette_Woo@nps.gov)

## Comment 44

### Commentor Information

Name	Organization / Affiliation	Comment Format
Edward Hofschneider	CNMI Public School System	website

*Legend: N/A = not provided*

### Text of Comment

[Text of comment begins on the following page]



# Tinian Middle and High School

PO BOX 520478, Tinian, MP 96952  
Commonwealth of the Northern Mariana Islands  
Public School System  
(CNMI-PSS)



**Lizabeth B. Perzinski, M.Ed.**  
Principal

**Edward M. Hofschneider, B.A.**  
Vice Principal

On behalf of Tinian Middle School and Tinian High School, I am writing to formally comment on the Revised Environmental Impact Statement for the CNMI Joint Military Proposed Action. This comment aims to express and detail the concerns of the school's stakeholders, including students, staff, parents, and community partners.

While we find the information in the revised draft to be comprehensive, the language and information regarding noise created by potential activities in Alternative 1. The draft does an excellent job in detailing the metrics used to identify the amount of noise created by each major activity and the peak noise levels that will be experienced by certain areas or entities on the island. The school appreciates being included in this assessment as it gives us a clear idea of what to expect.

**Our understanding is that we can expect peak levels of 117dB for explosive training and 104dB for aviation training that will be heard by our campus, and our concern is the following:**

1. The level of noise having a negative impact on our students and staff, especially on those who are particularly sensitive to strong sources of stimuli
2. The frequency of the impact from the noise being described as occurring "intermittently" (page 4-88), suggesting irregularity in how often it will have an impact on our campus.

Tinian Middle School and Tinian High School serves a diverse student population that includes students who are sensitive to high levels of certain stimuli, which includes noise and vibrations. The noise may also become a potential source of anxiety for our campus population due to the intensity and source of the sound. Both situations have the potential to disrupt student learning as teachers will have to address the behaviors that develop in students who are over stimulated or experiencing high levels of anxiety.

**Should the proposed action be implemented, we ask for proper channels of communication to be established between the school (including the Public School System) and the entities charged with the scheduling and organization of these activities.** This will allow school staff to be informed in a timely manner and be prepared to support our students prior to the peak noise levels being experienced. This includes ensuring that all students are inside the classrooms during the activities in order to limit student exposure to the sounds.

We also ask that further consideration and accommodation be given to the school, potentially in the form of building modifications, such as improved soundproofing insulation, to ensure that the impact experienced inside the classroom is mitigated as much as possible.

Thank you for taking the time to receive and hopefully address our concerns! We look forward to continuing to have engaging and productive dialogue with everyone involved in the EIS process for this proposed action.

Respectfully,

Edward Joseph M. Hofschneider  
Acting Principal

## Comment 45

### Commentor Information

Name	Organization / Affiliation	Comment Format
James Eck	N/A	website

Legend: N/A = not provided

### Text of Comment

RE: Tinian Live Fire Exercises Danger Zone

To whom it will concern,

I would like to offer some points for consideration regarding the proposed Danger Zone off the North end of Tinian, in our (public access) navigable waters. I have been operating boats here in the CNMI as a USCG licensed mariner since 2001. For the first ten years of my residence here I owned and operated two scuba diving charter boats. Weekly we would take divers down to the west side of Tinian 3-7 days a week with either one or two boats. Currently I my marine transportation job is limited to inside the Tanapag Lagoon, almost exclusively. However, I am still connected with the charter boats and scuba diving companies here on Saipan, as well as a recreational sport fisherman. I am also in weekly if not daily conversations with three separate shipping services here that supply goods (by boat) to Tinian and Rota.

Regarding the shipping of goods to Tinian and Rota, having the Danger Zone in place for days or weeks at a time will create an instant rise in the already exorbitant price of goods for those islands. The Danger Zone as proposed is in the highest trafficked area in between Tinian and Saipan. Because of our prevailing weather patterns, I estimate 95% of the year every mariner will choose to navigate down the west side of Tinian in transit between Saipan and Tinian. The east side will have ocean swell, wind and hazardous seas for vessels less than 100 feet in length. The shortest path for crossing the Tinian Channel is in between Cross Point on Tinian, going northeast to Saipan. The additional cost of fuel (being forced to drive several miles offshore and out from the Danger Zone) alone will force the shipping companies to raise their prices, passing on the added expense to their customers. We are in a depressed economy. Every price increase is felt at every level of our demographics. Changing the location, direction and timing of the Danger Zone can help minimize the military expansion on Tinian becoming a growing economic burden that the civilian population has to deal with. From a civilian's point of view, the option to choose the one area to designate as a Danger Zone which every mariner who makes the trip between Tinian and Saipan by boat will use makes no sense. A more reasonable compromise would be to designate the eastern side of Tinian, facing the Pacific Ocean. And posting the zone as active live fire training for days or weeks at a time is not reasonable. I think we can agree to maybe not more than 2 days in one week. Something like that. But to leave it open ended that an area will be closed indefinitely or until we say so is not something we would agree to. There has to be limits.

My other concern with regards to this proposed Danger Zone is the notification process. How will mariners know when it is safe and when it is closed (wherever the zone may be agreed upon)? Several of the small commercial fishing vessels do not carry VHF radios. As a merchant mariner, I am obligated to carry a VHF and monitor channel 16. I will be advised when the training area is being enforced. Not all vessels will be 'in the know'. How will that be handled? I have heard about fishermen being arrested for this type of infraction off of Guam. This is very unfortunate and avoidable.

45C

With regards to the training area(s) on Guam, do they offer something different than what the training on Tinian will look like? Why is the live fire training on Tinian even necessary when you already have the established facility on Guam? Tinian is such a small island and the ocean around it provides so much to all the people who call this area home. To reduce our access to not only the land but now the oceans too, seems to be an overreach.

Please understand that I do support our military. I support the defense of our freedoms and way of life. I understand there is a price to be paid by civilians as well, in order to have dedicated service members prepared to take on whatever adversary might lie in wait. There are other islands to our north that are uninhabited. Why not extend the training facility to those areas where you might not see a boat around there for days on end. Out here, boats are a daily occurrence (weather permitting of course). THANK YOU FOR YOUR SERVICE. GOD BLESS AMERICA. And thank you for allowing me to voice my concerns.

Respectfully,

James Scott Eck

## Comment 46

### Commentor Information

Name	Organization / Affiliation	Comment Format
Name Redacted	N/A	website

*Legend: N/A = not provided*

### Text of Comment

**46A**

Don't pollute our beautiful ocean. It will devastate precious marine life. It will also reduce the number of tourists visiting Saipan, a tourist island.

## Comment 47

### Commentor Information

Name	Organization / Affiliation	Comment Format
JOAQUIN MANGLONA	TINIAN SHIPPING SERVICES LLC	website

Legend: N/A = not provided

### Text of Comment

Hafa Adai, I am Jack Manglona and in behalf of Tinian Shipping Services LLC – a stakeholder in the shipping industry, I would like to express the business' opposition on the proposed temporary closure of offshore waters during live fire events in relation to the CNMI Joint Military Training EIS.

Tinian Shipping is a small cargo interisland shipping business that conducts reliable regular operations between the islands of Saipan, Tinian and Rota – at the most reasonable cost.

Our shipping operations rely on our current established route – direct, safe, efficient and is proven to be the optimal route because of its navigational ease, cost efficiency and travel time wise.

Any closure or rerouting would force our vessels to take significantly longer travel paths, resulting in higher fuel consumption, extended transit times, and increased operational expenses. On top of these already dreading effects, what we are most apprehensive about is that, the cargoes, the vessel and our crew will be exposed to a rougher and more hazardous sea conditions—compromising overall safety.

These burdens ultimately affect not just our operations, but also local businesses and residents who depend on the timely and affordable delivery of essential goods, including food, supplies, and construction materials.

We urge our decision-makers to consider alternative measures that balance national security training requirements with the economic sustainability of essential commercial shipping services. Options may include designating safe passage corridors, scheduling exercises to minimize conflicts with regular vessel traffic (not entirely closing the route), or providing advance notice and coordination to reduce disruption.

Maintaining open and efficient maritime routes is critical for the CNMI's economy and community well-being. We respectfully request that the final EIS reflect these concerns and incorporate safeguards to protect the viability of commercial shipping.

47A

## Comment 48

### Commentor Information

Name	Organization / Affiliation	Comment Format
Name Redacted	Stanford University	website

Legend: N/A = not provided

### Text of Comment

48A

The military's proposed surface danger zone on the northwest end of Tinian would have severe consequences for marine traffic, commercial activity, and tourism in the CNMI. This exclusion zone directly overlaps the most heavily trafficked and safest maritime corridor between Saipan and Tinian.

The proposed three-mile exclusion zone would force vessels—fishermen, SCUBA diving companies, cargo carriers, and recreational users alike—several miles offshore into deeper, rougher seas. This leads to at least two additional miles to a crossing under glassy seas with no wind. The excursion further offshore will undoubtedly lead to higher costs. Many companies that operate vessels are already struggling in our depressed economy, and the additional fuel and maintenance costs will inevitably be passed on to consumers, raising the already high cost of goods for residents of Tinian and Rota. This burden would be felt at every level of our community's demographics, and could lead to a vicious cycle that ultimately ends with the closure of a these businesses.

Navigating further offshore is not just more costly but also more dangerous, particularly for smaller vessels. The east side of Tinian is exposed to ocean swells and strong trade winds for most of the year, making it unnavigable to smaller vessels except during the calmest summer months – making it a better option for the danger zone than the heavily trafficked west-side route. The current danger zone would force mariners into deeper waters which increases risks from larger waves, stronger currents, and sudden changes in weather. This raises a critical safety issue for the many, recreational boaters, local fishermen, and small-scale transport operators who lack the size or equipment to safely operate offshore.

The west side of Tinian is a cornerstone of the tourism economy, hosting world-class dive sites and attracting visitors during the calm summer season. Closing this area for live fire exercises during peak tourist months would undercut the CNMI's image as a pristine, quiet, and welcoming destination. Tourists paying for a diving trip will not appreciate being diverted around a danger zone or hearing live fire in the background. Studies from Guam have already documented the negative effect of military training activities on tourism and community well-being.

The proposed duration of closures—"open-ended" or "until training is complete"—is unacceptable. Any closure should be strictly limited in time with advance notice. Mariners also need a clear and reliable way to know when a zone is active. Many small fishing boats do not carry VHF radios, and may inadvertently cross into a danger zone. The CNMI cannot afford disastrous incidents that may taint its reputation as a pristine and relaxing getaway, and that may cause harm to its local residents.

48B

The U.S. military also needs to conduct baseline studies on Tinian to understand how its exercises on Tinian affect the islands. For instance, we do not know how much lead is leeching into the porous limestone that Tinian is made of, which will subsequently make its way to the groundwater supply. How other toxic compounds associated with live-fire exercises, demolitions training, and an increase with all other things associated with the military's presence on Tinian affect it.

I support the military and respect the sacrifices of service members. But the placement, scope, and duration of this proposed danger zone reflect an overreach that places a disproportionate burden on civilian communities. The Marianas already served its role during World War 2 and is still suffering the consequences of legacy contaminants and polluted waters. The military should not make things worse than they already are in the Marianas.

Respectfully,

Yoshihiro Yagi

## Comment 49

### Commentor Information

Name	Organization / Affiliation	Comment Format
Rudolfo Pua	Concerned CNMI Citizen	website

Legend: N/A = not provided

### Text of Comment

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The proposed three-mile exclusion zone would force vessels—fishermen, SCUBA diving companies, cargo carriers, and recreational users alike—several miles offshore into deeper, rougher seas. This leads to at least two additional miles to a crossing under glassy seas with no wind. The excursion further offshore will undoubtedly lead to higher costs. Many companies that operate vessels are already struggling in our depressed economy, and the additional fuel and maintenance costs will inevitably be passed on to consumers, raising the already high cost of goods for residents of Tinian and Rota. This burden would be felt at every level of our community's demographics, and could lead to a vicious cycle that ultimately ends with the closure of a these businesses.

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The proposed duration of closures—"open-ended" or "until training is complete"—is unacceptable. Any closure should be strictly limited in time with advance notice. Mariners also need a clear and reliable way to know when a zone is active. Many small fishing boats do not carry VHF radios, and may inadvertently cross into a danger zone. The CNMI cannot afford disastrous incidents that may taint its reputation as a pristine and relaxing getaway, and that may cause harm to its local residents.

49A

**49B**

The U.S. military also needs to conduct baseline studies on Tinian to understand how its exercises on Tinian affect the islands. For instance, we do not know how much lead is leeching into the porous limestone that Tinian is made of, which will subsequently make its way to the groundwater supply. How other toxic compounds associated with live-fire exercises, demolitions training, and an increase with all other things associated with the military's presence on Tinian affect it.

I support the military and respect the sacrifices of service members. But the placement, scope, and duration of this proposed danger zone reflect an overreach that places a disproportionate burden on civilian communities. The Marianas already served its role during World War 2 and is still suffering the consequences of legacy contaminants and polluted waters. The military should not make exacerbate the already fragile condition of the Marianas.

**Comment 50**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
Probio Cabrera Jr.	CNMI PSS	website

*Legend: N/A = not provided*

**Text of Comment**

**50A**

Tinian can be a military hub, for both Airforce and Ground Forces, all live fire training must be for the Airforce, use Faralon De Medinilla and live fire; “e.g.”, for ground forces should use Pagan Island with additional leasehold agreements.

**Comment 51**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
Nick Gross	N/A	website

*Legend: N/A = not provided*

**Text of Comment**

**51A**

The live-fire area to the north-west of Tinian should be designed to avoid "overshooting" into our pristine waters that support fishing and commuters via water to and from Tinian and Saipan. Please look into the feasibility of moving the range to the east side of Tinian where there is very little water activity.

## Comment 52

### Commentor Information

Name	Organization / Affiliation	Comment Format
Name Redacted	N/A	website

*Legend: N/A = not provided*

### Text of Comment

Our islands are already facing one of the most difficult times in our economy, and now with the added risks from U.S. military activity, our land, water, and people are in even greater danger. This is deeply concerning and unacceptable. Many of us have lost our homes to typhoons and are still working tirelessly to rebuild from the ground up just to make ends meet. We cannot afford to have more taken from us when we are already struggling with so little. Our communities deserve protection, not further harm.

## Comment 53

### Commentor Information

Name	Organization / Affiliation	Comment Format
Name Redacted	Citizen	website

*Legend: N/A = not provided*

### Text of Comment

There is no reason to destroy what little we have left

## Comment 54

### Commentor Information

Name	Organization / Affiliation	Comment Format
suguru takahahi	N/A	website

*Legend: N/A = not provided*

### Text of Comment

**54A**

The need for alternatives that do not compromise public access or environmental health for SCUBA DIVING area.

## Comment 55

### Commentor Information

Name	Organization / Affiliation	Comment Format
Name Redacted	CNMIGA.ORG	website

Legend: N/A = not provided

### Text of Comment

Public Comment on the Revised Draft EIS – Strategic, Demographic, and National Security Concerns

The record must reflect a fundamental and uncomfortable truth: the “population” of Tinian and the CNMI is not representative of the American people. What exists today is not organic demographic growth, but rather a re-population process whereby roughly 95% of the workforce and residents are foreign nationals, overstayers, “anchor baby” dependents, and individuals with no legal or civic allegiance to the United States. Federal data confirms that over 70% of the CNMI’s workforce—approximately 15,000 individuals—are foreign nationals.

The CNMI’s unemployment rate for U.S. citizens, by contrast, stands at more than double the national average. This distortion of the labor force has national security implications that must be considered in the EIS process. The participation of foreign nationals and overstayers in this process raises serious legitimacy concerns. Non-citizens should not be given equal voice, let alone decisive influence, in determining how the United States defends its territory and projects force in the Indo-Pacific. Immigration fraud, visa overstays, and “anchor baby” schemes have been extensively documented in the CNMI. The Department of Defense, DHS, USCIS, CBP, and other federal agencies must treat these facts not as peripheral, but as central to the environmental, social, and national security impacts of the Proposed Action. Removal of non-citizens unlawfully present in the Commonwealth should be a top priority.

At the same time, it is indefensible that the CNMI government has extended land rights, homesteads, and other privileges to overstayers and primarily Filipino and Chinese nationals, while American citizens—who have paid federal taxes into these islands for decades—are denied access. GAO and OIG reports have repeatedly shown that the CNMI has wasted, mismanaged, and outright diverted hundreds of millions in federal funds. Typhoon relief, ARPA funds, and infrastructure grants have been siphoned into projects benefiting Chinese-owned businesses or foreign labor programs. These failures undermine trust, endanger local communities, and compromise the credibility of the CNMI government in managing any aspect of federal defense policy.

Further, there is evidence that so-called “public opposition” to DoD projects is being organized, funded, or amplified by non-American groups and actors with ties to the Chinese Communist Party and other foreign networks—namely the “UNITED FILIPINO ORGANIZATION” which has direct financial ties to the CCP CHINESE IN THE PHILLIPINES ( <https://cfbci.ph/about-us/> ) ; HENCE, THE CONTINUED PUSH FOR POGO, AND OTHER FORMS OF ILLEGAL MONEY LAUNDERING IN THE CNMI / ROTA-TINIAN. This alone should trigger heightened scrutiny under the National Historic Preservation Act (NHPA) Section 106 consultation process: comments must be weighed not just for volume, but for legitimacy. The voice of the American citizen, taxpayer, and service member must not be drowned out by organized non-citizen interests.

For these reasons, the Department of Defense should not only move forward with the Proposed Action, but should also consider the exercise of federal eminent domain authority where appropriate to secure land and resources necessary for the defense of the United States. The CNMI's repeated pattern of fraud, waste, and obstruction has demonstrated that federal defense and security needs cannot be subordinated to local political gamesmanship or foreign influence.

In conclusion, the EIS must confront—not ignore—the reality that the CNMI has been systematically compromised by non-citizen populations, foreign overstays, and the DEFRAUDING and EXPLOITATION of federal programs. Any public comments submitted by those without allegiance to the United States should be properly discounted. The Department of Defense must act decisively to defend America's interests, assert eminent domain if required, and ensure that U.S. taxpayers and U.S. citizens—not overstayers or foreign nationals—determine the future of these strategically vital islands.

## Comment 56

### Commentor Information

Name	Organization / Affiliation	Comment Format
Name Redacted	CNMIGA.ORG	website

*Legend: N/A = not provided*

### Text of Comment

THIS IS AN ADENDUM TO MY PREVIOUS COMMENT

## Comment 57

### Commentor Information

Name	Organization / Affiliation	Comment Format
Yutaka Yoshida	N/A	website

*Legend: N/A = not provided*

### Text of Comment

I am against military training on Tinian.

## Comment 58

### Commentor Information

Name	Organization / Affiliation	Comment Format
Name Redacted	RECOVERY Boat captain services	website

Legend: N/A = not provided

### Text of Comment

Greetings, my concern is that I drive a diving vessel and need access to the area where training is proposed. The vessel I am usually operating has only a 3 mile offshore distance.

**58A**

I need to get to the dive points on the west side of Tinian, also when seas are rough heading to dive points I maneuver the vessel near the island to hide from wind and waves. I really hope and suggest that the training will be done on a land range, it's enough that the economy for tourists is really bad , so please do not take our access away from us, thank you and best regards.

## Comment 59

### Commentor Information

Name	Organization / Affiliation	Comment Format
Amanda Pease	EPA Region 9	website

*Legend: N/A = not provided*

### Text of Comment

Please see attached EPA's comments on the Draft EIS for the CNMI Joint Military Training. Please let me know if you have any questions or would like to discuss any of our comments



## REGION 9

SAN FRANCISCO, CA 94105

August 25, 2025

Lisa Graham  
NEPA Program Manager  
Headquarters, U.S. Marine Corps (I&L LF/MCICOM GF)  
3000 Marine Corps Pentagon, Room 2D153A  
Washington, DC 20350-3000

**Subject:** EPA Comments on the Revised Draft Environmental Impact Statement for the Commonwealth of the Northern Mariana Islands Joint Military Training, Commonwealth of the Northern Mariana Islands (EIS No. 20250074)

Dear Lisa Graham:

The U.S. Environmental Protection Agency has reviewed the above-referenced document pursuant to the National Environmental Policy Act (42 U.S.C. Section 4331 *et seq.* (1969, as amended)) and our NEPA review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to EPA. It requires EPA to review and comment on the environmental impact of any proposed federal action subject to NEPA's environmental impact statement requirements and to make its comments public.

The United States Marine Corps has prepared the Revised Draft Environmental Impact Statement (Draft EIS) to support air and land-based training for ongoing and evolving joint expeditionary warfare tactics, specifically, distributed operations on the island of Tinian in the Commonwealth of the Northern Mariana Islands (CNMI). In developing this Revised Draft EIS, the Marine Corps evaluated changes in the way U.S. Armed Forces currently prepare for future conflicts and carefully considered the comments and suggestions, including EPA's, submitted on the 2015 Draft EIS and from collaborative CNMI government coordination meetings.

The current Proposed Action has been refined since 2015 and the Department of Defense (DoD) has performed further technical studies and consultations to inform the impact analysis for natural resources, cultural resources, and utilities, among other topics. We note that the project has been scaled back since its inception, including reduced impacts to sensitive corals, and we appreciate that the Marine Corps undertook groundwater modeling to characterize potential impacts to drinking water resources on Tinian. The EPA is a cooperating agency and has participated in meetings and Administrative Draft reviews.

## Review Summary

The EPA identified public health, welfare, or environmental quality concerns in the analysis that EPA recommends be addressed in the Final EIS. Since this is a long-term project that includes short-term construction and long-term training operations, we have identified design and mitigation opportunities for the Marine Corps to pursue to minimize impacts to the environment. The EPA's recommendations, outlined below and further described in the attachment, address groundwater and aquifer protection, wastewater and septic management, solid waste management and incineration, and unexploded ordnance and munitions-related impacts. We offer recommendations for reducing reasonably foreseeable impacts and to protect public health.

### *Groundwater Protection*

59A

The EPA appreciates the improvement in the Draft EIS groundwater analysis since 2015, including robust groundwater modeling. As the Draft EIS discusses, Tinian relies completely on groundwater for its water supply, and the basal freshwater lens underlying Tinian is the only source of drinking water for island residents. We recommend that the Marine Corps commit to conducting comprehensive groundwater monitoring that proactively assesses the configuration and integrity of the basal lens aquifer on Tinian through measuring water levels, pumping rates, and salinity concentrations while including environmental response actions and contingency plans should monitoring detect increasing salinity or groundwater contamination. We also recommend the Marine Corps consider providing funding and technical assistance to improve the resilience of the community drinking water system, thereby improving the resilience of the aquifer.

### *Wastewater Management*

59I

The EPA provides several wastewater management recommendations to support needed project infrastructure and to protect the aquifer and coastal waters. We recommend additional evaluation of the proposed septic system and note concerns about potential impacts to the system from portable toilets and vehicle wash racks. We also describe critical concerns about the limited septic sludge disposal infrastructure on Tinian. Finally, we suggest the Marine Corps consider enhanced wastewater treatment options to protect Tinian's groundwater and coastal water resources.

### *Solid Waste Management*

59M

We commend the Marine Corps' plan to create a Comprehensive Integrated Solid Waste Management Plan that considers the limitations as well as opportunities that a long-term project brings to a remote island location. We remain concerned with the low projected diversion rates of waste from ongoing and proposed training activities and the resulting amount of proposed waste disposal in CNMI, given the already strained solid waste resources. We recommend the Final EIS discuss current composition and disposal practices of all solid waste, including municipal solid waste, recyclables, and hazardous waste, from military activities on Tinian. We encourage the Marine Corps to create appropriate diversion infrastructure so that waste from project construction and operations is processed appropriately by the military and impacts to the environment are minimized.

### *Unexploded Ordnance and Munitions Impacts*

59P

We appreciate the Marine Corps' commitment to installing groundwater monitoring wells at the live-fire ranges and to establishing a monitoring plan in collaboration with CNMI. We recommend close coordination in determining locations of the groundwater monitoring wells and also recommend sampling for potential contamination to coastal waters. We recommend the Final EIS analyze the

potential for soil, groundwater, surface water, and coastal water contamination from the proposed live-fire ranges, incorporating information about proposed range configurations and local geology and hydrology. Finally, we urge DoD to ensure that a proper unexploded ordnance (UXO) detonation site is prepared and permitted before project construction begins to ensure that UXO found during project construction can be effectively managed in a way that minimizes environmental impacts. We recommend changing the planned construction phasing so that the Explosives Training Range is completed first and can be used for this purpose.

The EPA appreciates the opportunity to review this Revised Draft EIS and we look forward to further collaboration. If you have any questions, we are available to discuss our comments and recommendations. When the Final EIS is released for public review, please notify us and make an electronic version available. If you have any questions, please contact me at (415) 947-4167 or [prijatel.jean@epa.gov](mailto:prijatel.jean@epa.gov), or contact Amanda Pease, the lead reviewer for this project, at (415) 972-3068 or [pease.amanda@epa.gov](mailto:pease.amanda@epa.gov).

Sincerely,

Jean Prijatel  
Branch Manager  
Environmental Review

#### ENCLOSURE

##### 1. EPA's Detailed Comments

cc: Jacqueline Rice  
Natural Resources Program Director, U.S. Marine Corps

Zabrina S. Cruz  
Director, Bureau of Environmental and Coastal Quality

Kevin O. Watson  
Executive Director, Commonwealth Utilities Corporation

Edwin P. Aldan  
Mayor of Tinian

## Groundwater Resources

### ***Aquifer Management and Resilience***

As the Draft EIS discusses, Tinian relies on a shallow groundwater aquifer for its water supply, and the basal freshwater lens underlying Tinian is the only source of drinking water for island residents (p. 3-93). The aquifer is vulnerable to saltwater intrusion if groundwater extraction is not managed sustainably and is also susceptible to contamination due to Tinian's highly permeable geology (p. 3-95). The Proposed Action, if implemented, would result in two separate drinking water systems on Tinian extracting water from this single aquifer – one system managed by the Commonwealth Utilities Corporation (CUC) for the community as well as for some DoD water needs, and a second system managed by the Marine Corps for use by DoD. The Draft EIS groundwater modeling predicts that the DoD system would produce drinking water with appreciably lower salinity levels than the community water system. From our review of Table 8 (p. M-85), the groundwater model appears to indicate that the DoD water system may be more resilient to potential future droughts, suggesting that the community system may be more vulnerable to stresses on the aquifer. The Draft EIS is not clear whether this is an outcome from the model. The difference in design between the two systems means the DoD system would be easier to adjust to aquifer stressors such as overdraft, drought, or changing sea levels, while it is likely not possible to make significant modifications to the infiltration gallery well that provides all drinking water for the community (Maui Well No. 2).

59A

Using information in the Draft EIS, the EPA calculated that groundwater extraction across all proposed DoD activities, including the Proposed Action and other reasonably foreseeable actions, would increase by more than 10% over current community water usage.<sup>1</sup> This additional planned extraction from the only source of freshwater, together with the potential for the community system to be less resilient to aquifer stressors, highlights the need for robust groundwater monitoring that would identify potential issues early and support sustainable management. The EPA commends the Marine Corps for committing to fund a one-time hydrogeological study that would establish baseline data to support monitoring of Tinian's aquifer and for planning to establish groundwater monitoring in the vicinity of the proposed live-fire ranges (p. 4-156). However, the potential for consequential impacts to the community from decreased water quantity and quality and the potential for groundwater contamination from other elements of the Proposed Action necessitate a more robust and proactive groundwater monitoring approach.

***Recommendations:*** To support sustainable aquifer management, in the Final EIS, revise the discussion of groundwater modeling results to describe whether the model predicts that the community drinking water system may be more vulnerable to future aquifer stressors (such as drought) than the proposed DoD system and potential implications for sustainable aquifer management. Additionally, commit to conducting comprehensive and ongoing groundwater

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<sup>1</sup> The EPA calculated this by summing proposed water usage from the CNMI Joint Military Training (CJMT) Base Camp water system, CJMT North Field firefighting wells, CJMT construction water usage, the Air Force North Field Rehabilitation, Tinian Divert Infrastructure Improvements, and increased CUC water system usage predicted for CJMT population changes (p. M-32). This was compared to the average CUC water usage from 2019-2023 (p. M-15) and the assumed maximum community agricultural use of Well M-26 presented in the Draft EIS. This analysis likely underestimates DoD's contribution to aquifer extraction on Tinian as it does not account for current CUC water system usage by DoD.

59A

monitoring that addresses the entire Proposed Action, not just around the live-fire ranges. In the Final EIS, describe a groundwater monitoring plan for Tinian that assesses the configuration and integrity of the basal lens aquifer through measuring water levels, pumping rates, and salinity concentrations. Discuss additional groundwater monitoring well locations that would be needed to support this effort. Include an assessment of changes in salinity levels for significance even if levels are below the secondary drinking water threshold. In the groundwater monitoring plan, address all contaminants of potential concern associated with the Proposed Action, including contaminants associated with septic systems, waste disposal in unlined landfills, and munitions use. We recommend also including contaminants associated with historic military activity, which may include per- and polyfluoroalkyl substances (PFAS), metals, and pesticides. Facilitate information and data sharing with the Bureau of Environmental and Coastal Quality (BECQ), the CUC, and the EPA to support robust and joint adaptive management of the aquifer with the CNMI government. Finally, include a discussion of environmental response actions and contingency plans should monitoring detect increasing salinity or groundwater contamination.

Consider providing funding and technical assistance to improve the resilience of the community drinking water system in collaboration with the CUC and BECQ. Given the unique and continued critical importance of Tinian as a military training site (p. 1-4-1-5 and p. 2-44-2-46) and the presence of a fragile basal lens aquifer, increasing the overall resilience of the aquifer by supporting improvements to the community drinking water system would further DoD's national security mission. Improving community drinking water system resilience would also limit the possibility that the community system would be first to be impacted by potential future aquifer stress.

The EPA values the brief discussion of changing sea levels in the Groundwater Modeling Study (p. M-105). The study notes that sea level rise is not expected to significantly change the amount of freshwater available especially in areas bounded by sea cliffs and that a significant rise in sea level could necessitate changes in well screen depths. Planning for the sustainable management of the groundwater aquifer on Tinian would benefit from an expansion of this analysis.

59B

**Recommendations:** To inform monitoring and aquifer resilience planning, describe the most recently observed pace of sea-level rise in CNMI and discuss how different portions of the aquifer may be affected differently based on their location relative to sea cliffs. Analyze the potential impact of sea level rise on all current and proposed wells and describe which wells would more likely need rescreening or replacement to accommodate a changing aquifer configuration. Discuss the potential combined impact of increased groundwater extraction from the Proposed Action with predicted seawater levels on both the DoD and the community drinking water systems.

#### ***Aquifer Protection During Well Installation***

The EPA appreciates the robust discussion of well siting, installation, and operation recommendations included in the Groundwater Modeling Study (p. M-111-114), which includes a list of crucial field decisions and procedures that must be implemented to protect the groundwater aquifer during construction of the new drinking water system. We note that this list includes assessing the potential for collapsed surface features at well locations and that Figure 4.12-1 maps these features as occurring at the preferred new well field location.

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**Recommendations:** To ensure crucial field actions and decisions are protective of the aquifer, we strongly recommend that all final siting, design, drilling, and installation of wells be performed under the direct, on-site supervision of an experienced hydrogeologist with expertise in island hydrology. Ensure that the construction contractors installing the wells are aware of hydrologic information, well design, and installation recommendations from the Groundwater Modeling Study.

#### **Groundwater Extraction**

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The EPA is concerned that the Draft EIS is unclear about how much water can safely be produced from Maui Well No. 2. The Draft EIS states that the recent average extraction rate of Maui Well No. 2 is 0.85 million gallons per day (p. 3-82). The document also states that the well has an operational capacity of 1.5 million gallons per day (p. 3-80), although the Potable Water Study describes this as the pumping capacity of the well, allowing for one pump to be out of service, rather than a sustainable or safe yield (p. M-9). The document makes multiple references to 1.0 million gallons per day as an EPA-identified sustainable yield during drought conditions. We believe this figure may have been a suggestion made by staff to support analysis of the 2015 Proposed Action, rather than an official determination of ongoing sustainable drought yield for the well.

**Recommendation:** In the Final EIS, clarify that 1.5 million gallons per day is the operational pumping capacity and does not refer to a presumed sustainable yield from the Maui No. 2 well. Additionally, rely on the Groundwater Modeling Study to determine the significance of potential impacts to the aquifer rather than using the EPA suggestion that was provided in the context of the 2015 proposal.

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Additionally, the Draft EIS is not clear about the potential impacts of increased groundwater extraction on wetland resources. The document states that Lake Hagoi is situated over an impervious layer or perched water table (p. 3-97). However, the Draft EIS also states that it may be hydraulically connected to the groundwater, which would imply hydrology that is not associated with a separate perched water table. The source of wetland hydrology is important because if the wetland is dependent on groundwater, additional extraction could result in a reduction of the wetland resource.

**Recommendation:** In the Final EIS, clarify the source of hydrology for Lake Hagoi. If Lake Hagoi is groundwater dependent, analyze whether additional groundwater extraction could lead to wetland and habitat loss due to a lowering of the groundwater table.

#### **Potential Groundwater Contamination**

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While the Draft EIS provides robust analysis of potential impacts to groundwater quantity and availability from the Proposed Action, the document does not meaningfully analyze the potential for project elements to contaminate the groundwater on Tinian. The Draft EIS notes that the most sustainable approach to groundwater extraction in island environments is via a broadly distributed network of wells across the island (p. 4-141).

**Recommendation:** To preserve future capacity for increased groundwater extraction and protection of this single drinking water source, analyze the potential for groundwater contamination from the project, even if these impacts may be localized to groundwater areas

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that are not currently proposed for use as drinking water resources. Include analysis of the proposed septic system and leach field, use of unlined landfills without groundwater monitoring, and live-fire ranges in this analysis.

The EPA understands that PFAS has been detected in the drinking water on Tinian,<sup>2</sup> however, the Draft EIS does not discuss current levels of PFAS on-island nor the potential for contamination from the Proposed Action. While detected levels to date are below CNMI's Maximum Contaminant Levels and EPA's Primary Drinking Water Standard, discussion of the confirmed presence of PFAS on Tinian and any future military plans to utilize materials that contain PFAS would enhance groundwater planning and community disclosure.

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**Recommendations:** In the Final EIS, describe current levels of known PFAS in groundwater on Tinian. Discuss past, current, and proposed military activities that use PFAS-containing materials that could contribute to PFAS contamination in the shallow groundwater, which is particularly susceptible due to highly permeable geology. Clarify the planned fire suppression approach on Tinian, including whether fire suppression foam would be used and, if so, the specific foam that is planned. Clarify whether any military munitions that would be used at the live-fire ranges contain PFAS.

#### **Drinking Water System Disinfection Management**

The Draft EIS notes that the CUC drinking water system disinfects water using gaseous chlorine and that no other water treatment is necessary. The EPA understands that the CUC moved from gaseous chlorine to calcium hypochlorite briquettes for disinfection, primarily due to logistical challenges including issues transporting chlorine gas cylinders on and off Tinian. The Draft EIS does not describe the Marine Corps' proposed disinfection method for the new drinking water system.

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**Recommendations:** The EPA recommends that the Marine Corps coordinate with the CUC to better understand the decision to discontinue use of gaseous chlorine and to consider using alternative disinfection methods due to potential public safety concerns and logistical challenges. In the Final EIS, clarify the disinfection method the Marine Corps intends to use. If chlorine, indicate the amount of chlorine that would need to be stored on island, the method and location proposed for storage, plans to monitor the storage site, preparation for potential emergencies, and plans for disposal of empty cylinders. Discuss whether chlorine storage would trigger the requirement for a Risk Management Plan under Clean Air Action Section 112(r). Describe how the Marine Corps would ensure that Range Control staff are adequately trained and prepared to respond to potential emergencies.

#### **Wastewater Impacts**

##### ***Proposed Septic System***

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The Draft EIS proposes to construct and utilize a new septic tank and leach field system at the Base Camp for Military Lease Area wastewater needs. The document provides general septic tank and leach field sizing based on CNMI wastewater regulations and notes that the system could include a sanitary sewer collection system, a sewer lift station, and one or more Individual Wastewater Disposal Systems

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<sup>2</sup> See the 2022, 2023, and 2024 Tinian Drinking Water Quality Reports, which may be accessed at <https://www.cucgov.org/reports/>. EPA accessed these reports on 7/30/2025.

(p. M-134). The Draft EIS does not provide further details, such as the proposed location for the septic system or an analysis of whether the system may impact local groundwater or nearby coastal waters. The document does provide a map of popular dive sites (Figure 3.2-2), some of which appear to be directly adjacent to the Base Camp, as well a map of fishing and recreation locations (Figure 3.2-1), including locations southwest of the Base Camp. The Final EIS would benefit from additional context regarding the design and management of the septic system given Tinian's highly permeable and karst geology and the potential to impact the freshwater lens and nearby coastal waters. From EPA's review of the Draft EIS, it appears that the proposed septic system would be classified as a Large Capacity Septic System and would be subject to Class V Underground Injection Control (UIC) standards. We note that within the CNMI, BECQ has primacy for implementing EPA Class V UIC regulations.

**Recommendations:** Evaluate the ability of the proposed leach field to adequately treat effluent from the septic tank, as soil permeability must be appropriate to ensure proper treatment. Rather than relying on generally applicable CNMI septic tank regulations, describe the site-specific geology at the proposed septic system location and analyze potential impacts to local shallow groundwater, nearby coastal waters, and fishing and other recreation sites. Include a map of the proposed location of the septic tank and leach fields to support the analysis.

Given the highly permeable geology and rapid groundwater recharge on Tinian, describe whether enhanced wastewater treatment options such as denitrification, subsurface flow constructed wetlands, or packaged wastewater treatment systems were considered to meet wastewater treatment needs in the Military Lease Area. Consider implementing enhanced treatment options to minimize impacts to groundwater and/or nearby coastal waters.

Describe how the septic system would be designed, operated, and maintained to ensure that it can accommodate the planned variation in wastewater flow. The Draft EIS states that the wastewater infrastructure would be sized to accommodate peak flow, but that actual flow would vary significantly between training events and non-training periods, from as little as 1,500 gallons per day to as much as 53,000 gallons per day. (p. M-134). The EPA is concerned that, without proper system design and maintenance, septic systems do not always function adequately when subject to such variability in flow.

Commit to completing a wastewater operation and maintenance manual for the Base Camp wastewater system ahead of site construction and operation to minimize potential environmental impacts and to ensure that the system is properly operated. In the manual, describe the approach to maintaining leach fields and regular septic sludge removal and describe how operations would incorporate other project waste streams into the septic system, such as vehicle wash water and portable toilet waste. Consider committing to a wastewater system operator position to further reduce potential environmental impacts.

In the Final EIS, reference the CNMI UIC regulations found at CNMI Administrative Code Chapter 65-90 and describe how the Marine Corps would comply with these regulations.

#### ***Disposal of Wastewater from Portable Toilets***

The Draft EIS states that portable toilets would be used for construction activities as well as operations away from the Base Camp, and that septage from portable toilets would periodically be disposed of

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either at the new Base Camp septic system, the existing Navy Individual Wastewater Disposal system, or at a septage disposal site approved by BECQ (p. M-134-135). The EPA has concerns about the viability of the proposed disposal options, as there are no approved septage disposal sites on Tinian and the Draft EIS does not clarify whether the described Navy site is the Camp Tinian septic tank and leach field, which the Draft EIS notes is not currently in use (p. 3-83). Given this, it is also not clear where portable toilet waste would be disposed of before construction of the Base Camp system is complete. Further, the Draft EIS does not describe whether the proposed Base Camp septic system is designed to accommodate wastewater from portable toilets. We note that portable toilets can contain chemical additives that may harm septic system bacteria and impact their effectiveness.

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**Recommendations:** Discuss in the Final EIS how the long-term use of portable toilets would comply with CNMI wastewater regulations found at CNMI Administrative Code Chapter 65-120. Clarify the planned location for disposal of portable toilet waste both before and after construction of the Base Camp septic system. If the Camp Tinian septic system would be used, even temporarily, describe any actions that must be taken to prepare the system for use. Ensure that a plan is in place for portable toilet disposal before implementation of the Proposed Action. Describe whether portable toilets used on Tinian may contain chemical additives and whether the disposal of portable toilet septage may decrease the effectiveness of the proposed Base Camp septic system.

### ***Disposal of Septic Sludge***

The Draft EIS describes wastewater sludge generation as a form of solid waste (p. C-19), but septic sludge is not analyzed similarly to other solid waste streams. The document describes that septic sludge from the Base Camp septic tanks would be disposed of at a septage disposal site approved by BECQ and notes that septic sludge containing free liquids cannot be disposed of in the existing Puntan Diablo landfill or at the planned Atgidon Landfill (p. 4-123). The EPA notes that there are not currently any approved septage disposal sites on Tinian, and that the current temporary approach is to consolidate the community septic sludge into a larger system while awaiting future disposal (BECQ, personal communication, July 30, 2025). The Draft EIS appears to propose generation of a waste stream for which there is no approved disposal location on Tinian.

Finally, the Draft EIS states that portable toilets and Base Camp septic tanks would be emptied by licensed septic haulers for disposal (p. M-134-135). From our ongoing waste conversations with the CUC, the EPA understands that licensed septic haulers are not consistently available on Tinian.

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**Recommendations:** In the Final EIS, analyze septic sludge in the same manner as other solid waste streams included in the Solid and Hazardous Waste Study Update. Describe existing and planned waste disposal options on CNMI, expected waste generation from the Proposed Action, alternatives under consideration for waste disposal, and any infrastructure that would need to be developed by the Marine Corps to support the needs of the project.

Describe the current septic sludge hauling and disposal practices on Tinian, including for DoD training operations and the current septic system at the proposed Base Camp location. Discuss the plan for septic sludge disposal if there continues to be no approved septage disposal site available on Tinian. Additionally, discuss the increased septic sludge disposal that would be required outside of the Military Lease Area based on population increases associated with the

project, and any further strain this would place on the current septic sludge disposal capacity on Tinian.

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Commit that septic sludge would not be disposed of at unlined landfills without groundwater monitoring – these are permitted under the small community exemption available in Resource Conservation and Recovery Act (RCRA) Subtitle D regulations – nor consolidated temporarily into larger septic systems.

Analyze the availability of licensed septic haulers on Tinian. Describe contingency plans for septic hauling should there be a lapse in availability of licensed haulers in the future.

### ***Wastewater and Waste Oil from Wash Racks***

The Draft EIS describes vehicle and equipment wash racks associated with biosecurity facilities at the Port of Tinian and the Base Camp. The document states that wash racks would include oil-water separators, that material collected in the oil-water separators would be tested prior to determining appropriate disposition, and that wash water would be discarded in the Base Camp septic system (p. 2-31, 33). The Draft EIS does not describe what materials would be used to wash vehicles and equipment and how wastewater disposal in the septic system may impact septic system functioning. The Draft EIS also does not describe how waste oil from the wash rack oil-water separators would be handled and disposed of. The EPA notes that discharging motor vehicle fluids into septic systems is not allowed as it would result in a banned Class V UIC motor vehicle disposal well.<sup>3</sup> The EPA further notes that receiving wastes other than sanitary waste may affect a septic system’s UIC classification, as the septic system may then meet the criteria of an industrial waste disposal well.<sup>4</sup>

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***Recommendations:*** Identify how vehicles and equipment would be washed, including any soaps, pesticides or solvents, and describe whether any substances used in the wash water may impact the functioning of the septic system. Describe how wash water would be properly managed to ensure that oils, grease, and hydrocarbons from wash stations do not enter the septic system or impact the groundwater.

Describe the expected volume of waste oil and other vehicle fluids that would be generated from wash stations, and the planned disposition of waste oil from the wash rack oil-water separators, including whether this waste oil would require transport outside of CNMI as part of planned disposal of hazardous, industrial, and universal waste and e-waste streams. Describe whether disposal practices for wastewater from wash racks in the septic system meet the definition of a motor vehicle disposal well.

Discuss potential impacts to UIC classification and permitting of the septic system if it is used to dispose of wastewater from vehicle and equipment wash racks. As part of this discussion, describe whether using the septic system for wash rack wastewater disposal is allowed based on BECQ Class V UIC regulations.

<sup>3</sup> U.S. Environmental Protection Agency. (2024, December 16). *Motor Vehicle Waste Disposal Wells*.

<https://www.epa.gov/uic/motor-vehicle-waste-disposal-wells>. Accessed 7/31/2025.

<sup>4</sup> U.S. Environmental Protection Agency. (2025, June 24). *Large-Capacity Septic Systems*. <https://www.epa.gov/uic/large-capacity-septic-systems>. Accessed 7/31/2025.

## **Solid Waste**

We appreciate the Marine Corps' commitment to disposing of waste in appropriate waste streams (hazardous waste or ash to approved hazardous waste facilities, green waste to compost), as well as the commitment to source reduction, including direction to "mandate and enforce segregation and diversion of recyclables from the wastestream to minimize disposal" (p. M-157). Even with this commitment, the Draft EIS describes low projected diversion rates of waste generated from ongoing and proposed training activities. The solid waste disposal resources in the CNMI are already heavily strained and have limited capacity, including Tinian's Puntan Diablo dump and Saipan's Marpi landfill. The Tinian transfer station that currently processes recyclables for Tinian residents has limited capacity and financial resources. There are no hazardous waste disposal facilities located in CNMI.

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**Recommendations:** We recommend the Final EIS discuss the current composition and disposal of all solid waste from military activities on Tinian, including municipal solid waste, recyclables, and hazardous waste, and use this information to plan for improved waste diversion. To meet or exceed the DoD goals of 40% diversion, commit to creating appropriate diversion infrastructure in training areas on Tinian so that materials can be recovered efficiently and safely and to shipping recyclables off island to appropriate facilities that are not available on Tinian. Segregate waste into items for reuse, recycling, compost/green waste, construction and demolition debris, municipal solid waste, and hazardous waste. Clarify that all hazardous waste would be shipped to appropriate facilities outside of CNMI. Finally, to limit waste disposal in CNMI landfills, provide support to CNMI to ensure a separate site is available on Tinian for disposal of construction and demolition debris.

The Draft EIS states that the Marine Corps would potentially send waste to Puntan Diablo after it is permitted under the small community exemption available in RCRA (p. M-167). We are concerned that increasing waste disposal at Puntan Diablo as it is working to achieve and maintain compliance may stress the limited capacity of that facility. Special considerations would need to be made to control the types and quantity of wastes that would be sent to a small community landfill like Puntan Diablo, which, even if it is permitted under the RCRA exemption, would remain unlined and would not have groundwater monitoring. This includes ensuring that incinerator ash, household hazardous waste, and septic sludge are not disposed of at such a facility. The Proposed Action would be an 85% increase in current average daily disposal tonnage at Puntan Diablo (p. M-169) which would reduce the operational life of the facility and potentially exceed daily operational capacity (see Table 20, p. M-169). Plans to use small community exemption landfills for project-related waste should be temporary while DoD pursues permanent solutions.

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**Recommendations:** Commit not to dispose of waste at Puntan Diablo landfill until the EPA ensures compliance is met and can be maintained at the landfill. If waste is sent to Puntan Diablo, commit to avoid exceeding its daily operating capacity. Assist with training and equipment to ensure that Puntan Diablo landfill operators are able to maintain compliance with permit conditions and requirements. Provide adequate Range Control staffing to ensure waste that is sent to Puntan Diablo meets all requirements for the facility. Commit that incinerator ash, household hazardous waste, and septic sludge would not be disposed of at small community landfills.

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In the Final EIS, analyze the potential for groundwater contamination due to placing DoD waste in an unlined facility without groundwater monitoring requirements. Use waste streams estimated from current operations on Tinian for this analysis. Consider, based on the waste streams that DoD would like to dispose of (including, potentially, munition-related disposal and septic sludge), whether it would be prudent for any future landfills on Tinian to be lined. If so, consider supporting such developments financially and with technical assistance.

### **Incinerator**

The Draft EIS suggests that incineration may be a waste disposal option (p. M-170-171), but does not include information about proposed incineration technology, estimated annual emissions, types of waste streams to be incinerated informed by past and ongoing Tinian operations, improved diversion practices to limit the need for incineration, and protocols for testing of incineration ash. We note that the Clean Air Act Section 129(e) requires all solid waste incineration units to have a title V operating permit. A pre-construction permit would also be required, either from the EPA or BECQ. Municipal Solid Waste incinerator ash is subject to RCRA Subtitle C when it exits the combustion building/unit and facilities generating municipal solid waste ash must determine whether the ash is hazardous.<sup>5</sup>

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**Recommendations:** Provide information in the Final EIS about proposed incineration technology, estimated annual emissions, types of waste streams to be incinerated informed by past and ongoing Tinian operations, and protocols for testing of incineration ash. If an incinerator is pursued, we recommend the Marine Corps commit to thorough testing to determine whether ash is hazardous and avoiding disposal, even of non-hazardous ash, in unlined Tinian landfills (including Puntan Diablo and potentially Atgidon). Throughout the Final EIS, where BECQ is mentioned as the permitting authority, we recommend clarifying that the Marine Corps may also need a permit from EPA to ensure compliance with the Clean Air Act.

### **Unexploded Ordnance and Munitions Constituents**

#### ***Disposal of Construction-Related Unexploded Ordnance***

The Draft EIS does not describe current DoD practices for the discovery and disposal of construction-related and other non-training related UXO on Tinian. Military munitions, including UXO, are regulated by RCRA as a type of hazardous waste where treatment, storage, and disposal may require a permit to ensure protection of communities and the environment. The EPA has learned from CNMI officials that UXO removal and detonation are occurring on Tinian, using at least two locations when UXO can safely be moved. As there are no RCRA-permitted UXO detonation sites on Tinian, these locations are not being monitored or sampled for environmental impacts, including to Tinian's drinking water aquifer. The EPA is concerned that the Proposed Action would generate a hazardous waste stream with no permitted detonation site to safeguard against environmental impacts. While the Draft EIS confirms the need for construction-related UXO disposal by describing the Military Lease Area as having a medium-to-high probability of UXO (p. 3-76), the document does not describe a path forward for preparing and permitting an approved detonation site.

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<sup>5</sup> This determination is made by either testing using the Toxicity Characteristic Leaching Procedure (TCLP) (see 40 CFR Sec. 261.24) or by using knowledge of the combustion process to determine whether the ash would exhibit the toxic characteristics. Thus, DoD must determine whether the ash is hazardous prior to disposal. The February 3, 1995, Federal Register (pg. 6670) also discussed an expectation that non-hazardous MSW ash would be disposed in either a composite lined Subtitle D MSW landfill or a similarly lined monofill, and not to an unlined small community MSW landfill.

The EPA notes that when non-training UXO cannot safely be moved to an approved location for destruction, emergency situations may occur where UXO must be destroyed in place using emergency permits or the immediate response exemption from RCRA.<sup>6</sup> The EPA is available to further coordinate regarding RCRA requirements for these emergency situations.

**Recommendations:** Describe the current processes for non-training related UXO discovery and disposal on Tinian. Discuss whether geophysical surveys are used in the current DoD construction process to facilitate the discovery of UXO. Describe how often UXO that is found during non-training activities is unsafe to transport to detonation locations and must be detonated in place. Evaluate the potential environmental impacts associated with current non-training UXO disposal practices on Tinian.

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To ensure that UXO found during project construction can be effectively managed in a way that minimizes environmental impacts, we recommend the Final EIS includes a plan to prepare and permit a proper UXO detonation site before project construction begins. Consider constructing the Explosives Training Range first and permitting it for this purpose – this would have the added benefit of already planned groundwater monitoring to protect Tinian’s aquifer. In the Final EIS, include evaluation of the potential for environmental impacts associated with UXO disposal practices during project construction.

Describe the process DoD would use to determine when non-training UXO would be addressed using emergency permits or the immediate response exemption rather than transportation to approved detonation locations. As part of this analysis, outline processes that would be used for detecting UXOs during construction to limit the need for emergency detonations, such as requiring geophysical surveys.

### ***Live-Fire Range Contamination***

In addition to our recommendations for protecting the aquifer and coastal waters above, the EPA is concerned about the potential for munitions-related groundwater and coastal contamination. While the Draft EIS states that environmental risks associated with live-fire trainings may include soil and water contamination (p. 4-111), the document does not analyze the likelihood for contamination from the Proposed Action other than in a brief discussion about soil characteristics and migration of lead.

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The Draft EIS does not analyze other factors that may impact the migration of lead or other munitions constituents that have the potential to contaminate site soils and therefore surface water, groundwater, and coastal waters.

The EPA notes that munitions constituents include a wide range of chemicals, each compound with its own potential to migrate to surface or groundwater and with different levels of toxicity. We note the potential sensitivity of the proposed live-fire range locations, as the Explosives Training Range would

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<sup>6</sup> The Military Munitions Rule codifies standards applicable to emergency responses involving military munitions or explosives at 40 C.F.R. Section 266.204. Among these standards are expansions to RCRA exemptions for treatment or containment activities taken during immediate responses that address immediate threats. However, the EPA noted in the preamble to the Military Munitions Rule that “if an immediate response is not necessary to address the threat, and the response can be deferred, the responding personnel should seek a RCRA emergency permit under § 270.61.” See <https://www.govinfo.gov/content/pkg/FR-1995-11-08/pdf/FR-1995-11-08.pdf>, accessed 8/12/2025.

be located in the central portion of the aquifer where groundwater elevation is the highest (see Figures 2.1-1 and 3.13-1) and the Multi-Purpose Maneuver Range would be located near the coast in proximity to recreation sites, including Unai Lamlam (see Figures 2.1-1 and 3.2-1).

Through correspondence with the Marine Corps,<sup>7</sup> the EPA was anticipating that the Draft EIS would include a description of literature reviews on the availability of lead, metals, and other munitions constituents in soil, surface water, and groundwater to support the finding of less than significant impact.

**Recommendations:** In the Final EIS, analyze the potential for soil and ground, surface, and coastal water contamination from the proposed live-fire ranges, incorporating information about the proposed live-fire range configurations as well as local geology and hydrology. Include the range of potential constituents that may impact soil and water based on the munitions that are reasonably expected to be used, including an assessment of the need to include PFAS in this analysis.<sup>8</sup> Include an appendix with the literature review conducted by Marine Corps.

Describe whether the regular refilling of craters at the Explosives Training Range (p. 4-135) would result in the burial of munitions constituents and potentially facilitate migration into the groundwater. Additionally, describe whether planned surface water best management practices – such as sediment basins and diversion swells – could further concentrate munitions constituents and provide a pathway to groundwater. Discuss whether regular remediation of these areas would be needed to address contamination.

Describe the potential for low-order detonations,<sup>9</sup> training-related UXO detonations, and insensitive munitions<sup>10</sup> to affect quantities of explosive residues that remain on soils in live-fire ranges. Include information from relevant studies on the estimated frequency of low-order detonations for military munitions.

### **Live-Fire Range Monitoring**

The EPA commends the Marine Corps' commitment to installing groundwater monitoring wells at each of the live-fire ranges and to establishing a monitoring plan in collaboration with BECQ (p. 2-43). Robust baseline and regular groundwater sampling and monitoring is essential to detect munition constituent releases and to support immediate actions to protect the aquifer at the live-fire ranges. We

<sup>7</sup> L. Graham, personal communication, April 30, 2025

<sup>8</sup> U.S. Department of Defense. (2023). *Report on Critical Per- and Polyfluoroalkyl Substance Uses*.

<https://www.acq.osd.mil/eie/eer/ecc/pfas/docs/reports/Report-on-Critical-PFAS-Substance-Uses.pdf>. Accessed 8/4/2025.

<sup>9</sup> Studies show that when a round malfunctions and a high-order detonation is not achieved, it can deposit residues and contaminate an impact area as much as 100,000 properly functioning rounds.

Walsh, M. R., Walsh, M. E., Poulin, I., Taylor, S., & Douglas, T. A. (2011). *Energetic residues from the detonation of common US ordnance*. *International Journal of Energetic Materials and Chemical Propulsion*, 10(2), 169–186.

<https://doi.org/10.1615/intjenergeticmaterialschemprop.2012004956>.

<sup>10</sup> Insensitive munitions appear not to consume all energetic contents, but instead deposit residue even when detonated.

Walsh, M., Thiboutot, S., & Gullett, B. (2017). *Characterization of Residues from the Detonation of Insensitive Munitions*. <https://apps.dtic.mil/sti/citations/AD1053694>. Accessed 8/4/2025.

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note that groundwater monitoring data may also help to validate or refine modeling that would be conducted under the Range Environmental Vulnerability Analysis (REVA) program.

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**Recommendations:** Coordinate closely with BECQ to determine the locations of the groundwater monitoring wells and the sampling and analysis approach. Include explosives, metals, perchlorates, volatile organic compounds, and any other constituents specific to munitions used at the ranges. Install monitoring wells and conduct baseline groundwater monitoring before beginning operation at the ranges. Conduct baseline and regular monitoring and sampling of nearshore springs or groundwater seeps near the Multi-Purpose Maneuver Range to detect releases to coastal waters. If monitoring indicates that munitions constituents have impacted groundwater or spring water, commit to immediately notifying BECQ, CUC, and EPA and initiating prompt discussions on mitigation measures or other next steps.

We recommend that the maximum number of groundwater monitoring wells not be predetermined. When determining the number of wells and their location, analyze the local geology and hydrology, configuration of the ranges, including size, elevation, and operational approach, and range locations in relation to coastal recreation sites and the groundwater aquifer. Consider conducting dye-trace studies to confirm hydrogeological connection to the wells after well installation.

#### **Range Environmental Vulnerability Assessment**

The Draft EIS briefly describes the proposed REVA implementation on Tinian. This includes conducting a baseline survey before initial use of live-fire ranges followed by operational assessment modeling after one year of operations and then every five years (p. 4-112 and D-25). The EPA supports the Marine Corps' goals for the REVA program to be a proactive and comprehensive approach to ensure the environmental sustainability of operational ranges and to successfully mitigate environmental impacts from active ranges (p. 2-27). The EPA continues to have concerns with the traditional REVA approach, which relies on periodic modeling to determine the potential for environmental impacts outside of ranges but does not always act on model results, depending on whether relevant "pathways and receptors" for contamination are determined to exist near ranges. In addition to the inclusion of live-fire range groundwater monitoring, there are several opportunities to enhance the REVA approach on Tinian to improve collaboration with local partners and support sustainable use of the ranges.

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**Recommendations:** We recommend the Final EIS include a commitment to conduct initial surface and shallow subsurface sampling at the live-fire ranges as part of the baseline survey.

Describe in the Final EIS what constituents would be modeled by the REVA program and include explosives, metals, perchlorates, volatile organic compounds, and other constituents specific to munitions used at the ranges. As the Draft EIS states that the entire Military Lease Area would be designated as a "range complex" (p. 1-7), clarify the boundaries of each range for the purposes of determining what would be considered migrating "off-range." Disclose the pathways and receptors that would be considered in the REVA process, noting whether there are any on Tinian that would prompt action if the model determined that contamination may be migrating off-range. Finally, to support public disclosure and collaboration with CNMI partners, discuss specific actions the Marine Corps would take if the REVA model found that munitions constituents were likely to migrate outside of the live-fire ranges.

## Comment 60

### Commentor Information

Name	Organization / Affiliation	Comment Format
Mayor Edwin Aldan	Municipality of Tinian and Aguiguan	website

*Legend: N/A = not provided*

### Text of Comment

Submitting comments on behalf of the Tinian and Aguiguan Leadership.

[Text of comment begins on the following page]



# Office of the Mayor

*Municipality of Tinian & Aguiguan*

**Edwin P. Aldan**

*Mayor*

August 4, 2025

CJMT Project Manager  
Naval Facilities Engineering Systems Command, Pacific  
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415 Chalan San Antonio Road, Suite 112  
Baltej Pavilion Building  
Tamuning, Guam 96913

RE: Comments on the Revised Draft EIS

Dear CJMT Project Manager:

The Tinian Leadership recognizes the Department of Defense's (DOD) efforts to complete the Revised EIS for the CJMT project on Tinian. Moreover, the people of Tinian acknowledge the importance of the proposed training to ensure military readiness in our region.

Over the past 5 years, the Municipality of Tinian has built a strong partnership with DOD through mutual respect, transparency, and an understanding of Tinian's most critical concerns. These concerns focus on the protection of the environment, creation of employment and business opportunities, transparency and accountability, and respect for our culture and way of life.

60A

The Tinian Leadership believes DOD has made huge strides in developing a training program on Tinian that balances the need of national security with the economic, environmental, and cultural needs of the indigenous people.

Therefore, the Tinian Leadership supports DOD's plans to move forward with the CJMT training plans as long as DOD continue to prioritize the implementation of mitigation measures to prevent evasive species from entering Tinian, develop systems to prioritize local businesses for DOD contracts, minimize restricted areas that may interfere with subsistence fishing and commercial tourism, and continue community relation projects to benefit the Tinian community.



# Office of the Mayor

*Municipality of Tinian & Aguiguan*

**Edwin P. Aldan**

*Mayor*

Sincerely,

Edwin P. Aldan  
Mayor of Tinian and Aguiguan  
Delegation

Jude U. Hofschneider  
Chairman, Tinian Legislative

Joseph E. Santos  
Chairman, Tinian Municipal Council

cc: Members, Tinian Legislative Delegation  
Members, Tinian Municipal Council

## Comment 61

### Commentor Information

Name	Organization / Affiliation	Comment Format
Kitty Simonds	Western Pacific Regional Fishery Management Council	website

*Legend: N/A = not provided*

### Text of Comment

Please see attached comments



**Western  
Pacific  
Regional  
Fishery  
Management  
Council**

August 26, 2025

CJMT Project Manager  
Naval Facilities Engineering Systems Command, Pacific  
c/o AECOM  
415 Chalan San Antonio Road, Suite 112, Baltej Pavilion Building  
Tamuning, Guam 96913

Dear CJMT Project Manager,

The Western Pacific Regional Fishery Management Council (Council) appreciates the opportunity to provide comments in response to the Department of the Navy's Notice of Intent to prepare a Supplemental Environmental Impact Statement/Overseas Environmental Impact Statement (SEIS/OEIS) for the CNMI Joint Military Training (CJMT) area.

Established under the Magnuson-Stevens Fishery Conservation and Management Act (MSA), the Council is responsible for the conservation and sustainable use of fisheries resources in the U.S. Exclusive Economic Zone (EEZ) around Guam and the Commonwealth of the Northern Mariana Islands (CNMI). In that capacity, the Council coordinates closely with fishing communities and resource agencies to ensure military activities do not compromise fisheries sustainability, marine resource protections or traditional access to culturally significant areas.

With this context, the Council submits the following community-derived and Council-supported comments for your consideration in the development of the SEIS/OEIS:

### **Preferred Alternative**

The Council Supports the **No Action Alternative** because it avoids construction of new live-fire ranges and prevents the establishment of large surface danger zones (SDZs) that would disrupt fishing access around Tinian. This alternative maintains existing training without adding infrastructure or closures that could negatively affect commercial, recreational and subsistence fisheries.

If the No Action Alternative is not selected, **Alternative 2** is preferred over Alternative 1 due to its smaller increase in training tempo (5% vs. 15%). While this option is less disruptive, it still introduces new, permanent access restrictions in high-value fishing zones at Tinian's northern tip. Without robust enforceable safeguards, even "less than significant" impacts in the EIS could translate into meaningful economic losses, displacement of fishing effort and cultural erosion over time.

### **Public Access and Coordination (EIS Section 4.1)**

The EIS states that Alternative 1 would require “additional coordination and consultation” with the CNMI stakeholders. This should be a binding requirement for **all** action alternatives and should include:

61A

- Avoiding SDZ closures during fishing tournaments, traditional voyages and other cultural and community events.
- Publishing an annual training calendar with tentative closure dates and providing real-time updates for schedule changes. Establishing a minimum 30-day notice period for planned closures.
- Post Notices to mariners in Saipan, Tinian and Rota
- Include Guam mariners in notifications for CNMI-area closures
- Disseminate closure notices via email, social media, news services
- Recognizing that not all residents have reliable internet or smartphones, traditional outreach methods are also essential. These include printed notices at agency bulletin boards, fishing supply stores, local shops and markets, and announcements on AM radio to reach elders and rural communities
- Establish a community advisory committee to integrate traditional ecological knowledge into scheduling decisions

Given that the multipurpose range at the northern tip of Tinian could trigger SDZs extending up to 3 miles offshore (Figure 2.1-9), coordination with local government agencies, NGOs, fishing clubs, air and sea transport companies, and local media is important. Closures may force fishers to travel farther offshore or around the island’s east side, increasing fuel costs and safety risks, especially during inclement weather.

### **Land Use and Recreation (EIS Section 4.2)**

61B

This section should explicitly recognize the importance of the northern Tinian waters for spearfishing and commercial harvests transported to Saipan. As this area is an important fishing ground for providing fresh seafood to both Tinian and Saipan, closures should be avoided during “good fishing days” that are determined by the lunar calendar, wind condition and community input.

### **Socioeconomic Impacts (EIS Section 4.3)**

61C

The EIS acknowledged that “Temporary activation of surface danger zones in waters north of Tinian during live-fire training at the Multi-Purpose Maneuver Range could significantly affect fishing and boating, as boaters may have to travel longer distances when the surface danger zone is active.” Mitigation measures should include:

- Working with local stakeholders to identify low-impact training windows to fishers and mariners;
- Providing fuel-cost offset or alternative harbor access (e.g., adding boat ramps on the opposite side of Tinian, repairing the Sugar Dock boat ramp on Saipan, new fishery facilities, etc.) as closures are anticipated to cause rerouting.

61D

### **Biological Communities (EIS Section 4.4)**

While the EIS states projectiles will not enter the water, mitigation should be in place in

61D case of accidental impacts. The Navy should fund baseline and post-training surveys coordinated with local agencies (e.g., the Division of Fish and Wildlife, Division of Coastal Resource Management). Related surveys include detecting changes in reef health, fish abundance, habitat conditions, etc. Funding aquaculture/restocking programs to offset access losses will benefit the fishing community.

### Regulatory and Jurisdictional Concerns

61E 50 CFR § 665.404(a)(2) requires commercial bottomfish vessels to attain federal permits in order to fish in the EEZ. Local CNMI Commercial Fishing Recording & Reporting Regulations (Title 85, § 85-30.5) also requires individuals or businesses who commercially harvests, purchase or sell marine life within CNMI waters to obtain a valid license. The fishing community has expressed concern that the designation of the Military Lease Area Range Complex on Tinian could lead to its reclassification under federal jurisdiction, which may require bottomfishers to obtain both federal permits and CNMI licenses to operate near Tinian and Saipan.

### Environmental Monitoring and Data Integration

- 61F
- a Incorporate data from recent 2025 NOAA and Ocean Exploration Trust cruises to identify and protect deep sea coral, seamounts, hydrothermal vents and other sensitive habitats;a
  - a Expand marine mammal monitoring to include continuous passive acoustic systems and share results with local and regional partners;a
  - a Avoid training during critical spawning periods in marine life;a
  - a Annual public reporting of marine monitoring data conducted by the Navy that is easily accessible by the public;a
  - a The EIS should acknowledge that training impacts from Tinian, Pagan and FDMa combined could have regional-scale effects on migratory species and fisheries.a

The Council supports the military's training needs but urges adoptions of an alternative and associated mitigation measures that safeguard fisheries, cultural practices and maritime safety. A commitment to transparent communication, early coordination, and science-based monitoring will build trust and protect both national defense readiness and the livelihoods of CNMI communities.

We look forward to reviewing the final SEIS/OEIS and providing further input as needed.

Sincerely,



Kitty M. Simonds  
Executive Director

cc: The Honorable Governor David M. Apatang  
CNMI US Congresswoman Kimberlyn King-Hinds  
CNMI Department of Lands and Resources Secretary Sylvan O. Igisomar  
CNMI Council Member Pedro Itibus  
CNMI Council Member Gerald Weaver

**Comment 62**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
Name Redacted	N/A	website

*Legend: N/A = not provided*

**Text of Comment**

Please take the NO ACTION alternative to protect the environment, people, and cultural resources of tinian island and the entire marianas. There has been insufficient analysis of the cultural and historical site impacts. There are threats to endangered species. And also a lack of meaningful community engagement and consultation.

## Comment 63

### Commentor Information

Name	Organization / Affiliation	Comment Format
GP Aldan	Tinian Women's Association	website

*Legend: N/A = not provided*

### Text of Comment

Please see attachment

Submitted by G. P. Aldan, Age: 62 Marpo Valley, Tinian

Tinian is only 30 miles longitude and 15 miles latitude; impact of the U.S. military presence has been felt by the entire one-third of the island where the civilian population live. Any increase in their activities will significantly impact a small population with such a small land mass. The mere number and types of activities being proposed will negatively impact its people, its land use and its way of life. We don't need to agree with the military assessment whether their presence is less significant or what.... we know what we are experiencing with their people and their contractors everyday to decide whether it has affected our lives and to what extend. It is our job to let them know how much of disturbance they are creating.

63A

The clearance of the four runways has killed trees that have been a part of our forestry some of which were medicinal herbs still practiced by our people. The federal government through a grant, has made available \$1.6 million over 3-year period for reforestation effort CNMI-wide. Reforestation plan saw a small area within the proposed Firing Range in Pina that has since been relocated to a rocky area where medicinal plants will certainly not thrive. Firing range in Vieques of Puerto Rico after being used for years have not produced fertile soil for any meaningful agricultural activities. Firing range as I understand, will see use of high-powered weapons inclusive of live missiles. Chemicals associated with these types of ammunition are highly toxic to our water, our air, any reforestation effort and most importantly to the people that lives on Tinian particularly those living in Marpo Valley closest to the Firing Range.

63B

Accumulation of toxic chemicals will increase over time and will be at a very toxic level at some point in the future exacerbated by what's already in the ground from WWII. This has been the experienced of Ewa Beach in Hawaii. Initial tests of soil, air and water should be done by the military to determine baseline data. Such data must be made available to the CNMI government so that follow-up on a periodic basis for testing of ground, water, air and shorelines.

Soil have been contaminated as evidenced by the demise of mass herds of cattle owned by the Bar K Ranch in Tinian. In the middle of the ranch were acres of WWII remnants that were buried by the U.S. military when they were ordered to leave Tinian. It is my opinion that the high incident of cancer amongst the island population may have been from the WWII remnants contamination of our water, air, land and shorelines. Our leaders seem to be oblivious to this possibility. There are reports to be read about leading causes of death in the CNMI.

We see our people foraging our forest within the two-third area for yams, taros, wild hot peppers as well as hunt for coconut crabs, birds, and other edible wildlife as part of our traditional way of living. The military need to take responsibilities on the destructions of our

people and our land during WWII ..... we were the collateral damages from wars between countries beyond our control.

This clearance also eradicated the wild “wild hot pepper” harvested by the local people for their income. Because of the lack of records kept by the municipal government, it is not possible to estimate a realistic financial loss of this particular economic activity. It is safe to say however, that most women generate most of their income from the sale of hot peppers.

63C

The impact to our people will be significant as the island population such that it is vulnerable to any outside forces that the troops will impose. Businesses will take the opportunities it presents to establish bars and other adult entertainment in an unregulated (absence of zoning) growth. Elected leaders have not addressed any of such issues. Release of a thousand troops will see the increase in cultural conflicts that were, being experience now to be negative and will be sources of confrontations. A young man shared in a diner that “local women were pretty loose” and was heard by an elder. Extremely disrespectful and gave reason for confrontation. Evidence is the Okinawa experience of significant increase in crime against women and children resulting in murders and often times conflicts emerged between the civilian law enforcement and that of the military. The lack of training on the part of the police force on Tinian present a frightening scenario of the negative impact on the population for an orderly and peaceful community.

The lack of a warning signal system is not addressed for the local population to be informed and seek shelters from disasters (foreign attack). This warning system must be inclusive of physically and mentally challenged as well as for the elderly.

We need for our elected official to read and truly analyse the impact without depending on the analysis done by the military people. I really believe there is also a “psychological warfare” going on to convince our people by creating confusion, creating stress and pressure from all these EIS that must be reviewed one right after another.

63D

These reports are so massive that I can’t understand what they are trying to say. I need to hear it from our own people as to what is really going to happen. We need to have it written in Chamorro with at least 90-day review time. We need help from our elected people to support and create opportunities to gather and really discuss what the report (EIS) is trying to tell us. These leaders are very, very quite....I wonder what is going on.

I think there is so much more than what is written....the (military) made so many offers and changes that we cannot catch up with them. I know that what they say and what actually happens never matched. The report must be thoroughly explained to our people in smaller group setting and that discussions and questions are encouraged. A 2-hour public meeting is not adequate as we don’t know enough English to discuss issues from the Rvsd. CJMT. Its doubly difficult given the document is all in English.

We are going to see ourselves driven into the remaining one-third with our cows, birds, plants and homes. There will be “pressure” to literally get out of Tinian....this is the “psychological warfare” I was talking about.

One hand of the federal government is saying we are partners and their other hand is destroying our island. I cannot trust them....thats all I have to say.

Submitted by: G. P. Aldan

## Comment 64

### Commentor Information

Name	Organization / Affiliation	Comment Format
JB Aldan	Tinian Women's Association	website

*Legend: N/A = not provided*

### Text of Comment

Please see my attachment

**Comments: June 2025 Rvsd. CJMT Environmental Impact Study (EIS)**

**Janel B. Aldan, San Jose, Tinian**

I work for a youth program and right away I can say that these young people will have challenges they would find difficult to handle. I also use to work for law enforcement and saw young people that have tested boundaries and have gotten into trouble.

**64A**

Our culture, very different from that of the typical American, will see confrontations, confusions and “misreading” of gestures and behaviours. I don’t see any attempt or plans to address this particular issue. Okinawa had a very bad experience with military men perpetrating crime against women and children. These crimes were not of minor offense rather severe and serious ranging from rapes as well as murders. It took Okinawa a long time to have this issue addressed as I believe their national government was somewhat more concern of how such issue would impact the Japanese-American relationship and/or treaty. I have not heard of any discussions similar to this issue and its impact on the U.S.-CNMI Covenant. At what price should we sacrifice our women and children.

**64B**

Adult entertainment will naturally follow military bases as we see it with bases elsewhere in the country as well as those in foreign countries. Naturally the business community will go where there is some economic benefit. There have been no discussions on how the elected people will begin to address some degree of orderly growth. Are we going to see adult entertainment within the village where families reside? The military have their EIS.....where is our Socio-Economic plans to mitigate all these activities?

**64A**

As an ex-law enforcement officer, there is inadequate number of police officers to ensure the community will have and maintain reasonable level of safety and that they are qualified, trained, and fit to respond.

**64B**

The cost of social disruptions will be enormous and expensive. No one is talking about funding to address law enforcement, orderly growth, traffic, noise pollution, contaminated soil, water, air and sea and how restrictions on access will impact on our livelihood.

I am a parent and I am concern because Tinian will no longer be the peaceful and quite place to raise families.

Submitted by,

J. B. Aldan

## Comment 65

### Commentor Information

Name	Organization / Affiliation	Comment Format
Tinian Retired Educators	Tinian Retired Educators- Public School System	website

*Legend: N/A = not provided*

### Text of Comment

Please see attached

## FINAL COMMENTS – June 2025 Rvsd. CJMT Environmental Impact Study

**Submitted by: Retired Educators, Tinian**

We are retired teachers of Tinian Jr. Sr. High School with combined teaching experience of over 40 years.

### **Classroom Instructions**

65A

Our experiences covered period of time when there were no military training activities to the time when the U.S. Marine are on island engaged in different training activities. We were teaching when jet fighters would fly in and out, training of the young Marines in mock war games with the use of helicopters, night time training activities as well as different times of the day.

During training, we often had to stop instructions and other student learning activities because of the noise from helicopters, jet fighters and other aircrafts. Students would stop learning activities and start talking about the noise and questioned what may be happening with the military on island.....students' sense of curiosity competed with planned learning instructions.

### **Mitigations**

65B

1. Classroom windows; shall replaced all instructional classrooms (inclusive of library, Special education classroom, resource rooms, and Audio-Visual Rooms) windows with noise reduction type of windows significantly reducing noise level that would not compete with classroom instructions for all students including those with disabilities ranging from mental to physical. Autistic, and other psychologically challenged students as well as those challenged on their hearings are all an intricate part of the student population. The noise reduction windows have been used by other schools, libraries, health clinics in other U.S. jurisdictions and/or military base neighbourhood.
2. State Assessment must see conducive environment to allow students for their best performance. PSS must provide schedule and or changes made to the school calendars must be reported to the appropriate military branch. This includes quarterly examination days. Training calendar must not schedule activities that would create any level of noise and/or other distraction to the students.
3. Troop managers, commanders or other titled officers must ensure that troops are provided with cross-cultural education to prevent conflicts arising from “misreading” of cultural gestures and/or communications and, all laws pertaining to the protection of children and youth in the Commonwealth. Youth under the age of 18 and those physically and mentally challenged.

4. Because the high school is combined with middle school students; it is crucial that the presence of troops in the campus be reduced as much as possible. This is to address incidents in the past when female middle school-age students were found interacting with Marines. To allow such interactions invites the potential for violations of laws with reference to minors especially those incidents reported and adjudicated by the court of laws as in the experience of the Okinawa women.
5. Explore the possibility for schools to “piggyback” on military internet connection to expand the capability of the current infrastructure provided by PSS.
6. Any injury as result of invitations issued by any branch of the Dept. Of Defence for any “military show-N-Tell” must assume legal responsibility.

## Comment 66

### Commentor Information

Name	Organization / Affiliation	Comment Format
Scott Gore	FAA	website

*Legend: N/A = not provided*

### Text of Comment

Attached is a comment letter from Federal Aviation Administration (FAA) Regional Administrator Raquel Girvin. Thank you for your attention to these comments.



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Western-Pacific Region  
Office of the Regional Administrator

777 S. Aviation Blvd. Suite 150  
El Segundo, CA 90245

September 2, 2025

Ms. Lisa Graham  
U.S. Marine Corps  
NEPA Program Manager  
I&L LF/MCICOM GF  
submitted via: <https://www.cnmijointmilitarytrainingeis.com/>

Subject: CNMI Joint Military Training EIS Comments

Dear Ms. Graham:

Thank you for the opportunity to review and comment on the Revised Draft Environmental Impact Statement for the Commonwealth of the Northern Mariana Islands (CNMI) Joint Military Training.

The FAA notes a proposed aircraft shelter is shown on the USAF DIVERT lease area of Tinian International Airport on Figure 2.1-1, Military Lease Area with Proposed Action Features of the Draft CNMI Joint Military Training (CJMT) Environmental Impact Statement (EIS). A footnote on the figure in the legend that says: "This location is approximate." The Draft EIS indicates the shelter may be used for performing emergent minor aircraft repairs or maintenance, equipment staging, training unit mustering, or similar purposes.

The proposed construction of an aircraft shelter on Tinian International Airport may require the review/update of the USAF DIVERT lease with Commonwealth Ports Authority (CPA), the local airport sponsor that owns and operates Tinian International Airport.

**66A** The CPA's Airport Layout Plan (ALP) will need to be updated to include the proposed aircraft shelter. The USMC must work with the CPA to update the ALP, and file a Notice of Proposed Construction or Alteration (FAA Form 7460-1) as required by Title 14, Code of Federal Regulations, Part 77, Safe, Efficient Use, and Preservation of the Navigable Airspace, so the FAA can ensure the safe and efficient use of navigable airspace at that location. Depending on the precise location of the shelter, the FAA may have its own National Environmental Policy Act (NEPA) action for the proposed shelter. FAA's review of Form 7460-1, is not a major federal action that must comply with NEPA.

Additionally, since the U.S. Marine Corps' (USMC) proposed project has substantively changed since 2013 when the FAA had accepted the invitation to be a cooperating agency, the FAA no longer has any federal actions associated with the USMC's current proposed project. Thus, we

66A

request that you remove the FAA from the list of cooperating agencies from your Final Environmental Impact Statement for this proposed project.

Your attention to these comments is appreciated. If you have any questions, please contact me at [Raquel.Girvin@faa.gov](mailto:Raquel.Girvin@faa.gov) or (424) 405-7000.

Sincerely,

A handwritten signature in black ink, appearing to read "Raquel Girvin". The signature is written in a cursive, flowing style.

Raquel Girvin  
Regional Administrator

## Comment 67

### Commentor Information

Name	Organization / Affiliation	Comment Format
Kaeli Swift	University of Washington	website

Legend: N/A = not provided

### Text of Comment

67A

Overall impression: Both Alternative Action 1 and 2 propose action that appears incompatible with Fanihi recovery on Tinian, lack acceptable consideration for marine mammals, threaten public use of MLA land for recreation or ranching, and inappropriately attempt to minimize noise impacts to the people of Tinian (and Saipan). Because no fine scale vegetative work has been done to fully understand Tinian's forests, the DOD has assigned the vast majority (~90%) of MLA land as essentially non-important forest. While they are correct that only a small portion of the MLA contains what can be considered "traditional" native limestone forest, the remaining forest is still home to large quantities of native and medicinal trees, as well as containing high densities of wildlife including coconut crabs, birds, and even deer. As a result of this designation the EIS states that their proposed habitat loss is negligible. The loss of these degraded forest tracts would have a considerable impact on wildlife populations on Tinian and should not be considered negligible. While this EIS indicates that biosecurity measures for brown treesnakes (BTS), coconut rhinoceros beetles (CRB), and little fire ants (LFA) are being developed, there isn't very much attention given to other potentially harmful invasive species. The suggested biosecurity measures against the top three are not reflective of the absolute most that could be done, which is what the community should demand.

67B

Specific comments by page:

2-34: Example of weak biosecurity measure. Line 5 indicates that only portable BTS barriers would be used. Permanent barriers exist and could be implemented as a stronger biosecurity option

3-21 Table 3.4, and 3-22 : does not accurately reflect the current numbers of Fanihi on Tinian, as well as excludes the importance of areas on the MLA that are especially important for the ongoing recovery\* of bats on Tinian. It likewise does not identify the areas of highest fruit bat activity as restricted areas for DOD development. \*Recovery is currently happening, it is not theoretical... Tinian fruit bats are present and increasing in numbers.

67C

4-27: In order to accommodate continued recreation and ranching on the MLA, the EIS states that the MLA will be subdivided to allow these activities to continue, however it does not identify how it will divide up by activity. It may be that x% of land is left available for hunting, but if that land is all tangantangan forest, it may not actually be useful for this purpose. Further specificity and scrutiny should be requested by community to understand how their access will be managed.

67D

4-69. This page primarily addresses impacts of noise pollution. While some beneficial considerations have been made (ex: flights will be restricted to no less than 1000ft above important habitat) it does not address the noise impacts of landing or touch and go exercises. Lake Hagoi, which is among the only areas on Tinian home to the Mariana Moorhen, is within 1,000ft of Landing Zone 2 and we have no reason to believe these exercises would not impact the birds there. There is no mention of this in the EIS. Take home message: how do they plan to address take off/landing noise, which is considerable?

- 4-71: The documents jumps back and forth and does not clearly state how much flight operations we can expect on Tinian. In some cases they say it will occur for only a few weeks out of the year but their tables report a very different story. The numbers reported in the tables seems to suggest a sustained and high level of activity year-round.
- 67E**
- Table J-5: 29,238 take offs and landings every year
  - Table J-7: 27,207 hours of flight within 1 mile of the MLA annually (that is 1,133 days worth of noise)
  - Table C.2-1: 1,975 training annually
- 4-73: The EIS implies that since each noise event is very short (say the discharge of a firearm, or a single landing event), these events have a negligible impact on wildlife. This does not consider the cumulative effects of what their tables suggest will be a high level of sustained activity year-round.
- 67D**
- 4-74: The proximity of the proposed Explosives Training Range to known areas of use by Fanihi will harm the recovery effort of this species by causing bats to flush and potentially abandon the island as a home. It will also cause temporary hearing loss, as identified in Appendix J. They report that this is unimportant since fruit bats do not use ecolocation to hunt. Would you be willing to lose your hearing for an hour multiple times a day?
- 67F**
- 4-77: The EIS suggests that there will be no impacts on migratory birds from north field construction. This is unequivocally untrue. Migratory birds use the north field area for as a stopover site during migration. Since the initiation of construction I have noticed a decrease of these birds on the North Field. Likewise, seabirds such as terns and noddies used to use the tall ironwoods on the north field for nesting sites.
- 67C**
- 4-116: The EIS continues to use double speak when addressing noise pollution. On the one hand they report that that the noise boundaries do not extend much beyond the footprint of the landing zone, and are negligible. This is objectively untrue and many people probably have firsthand experience with this if you've every been at the airport when they are conducting touch and go's. In Appendix J, their numbers indicate that landing noise covers an area of nearly 12,000ft in diameter. This is much larger than the "landing zone" that they claim in chapter 4 will not produce much noise.
- 67D**
- 4-116: If you run the numbers on their proposed flight hours and assume they are not flying at night, you get three planes flying over Tinian every day. This amount of air traffic would have a deleterious impact on wildlife and people. No one like living under an airport.
- Additional feedback based on the Public Forum:
- Plans for a new dump
- 67H**
- What was communicated at the Public forum: While the dump would be created in collaboration with the DOD it would ultimately be run by the municipality and the current dump would be closed. This future dump would be fee based. In a nutshell the new system would require that people drive further, use a road in poorer condition, and pay to dump their trash.

## Comments

67H

A fee based-program would result increased illegal dumping on Tinian. Illegal dumping is already an issue, and asking community members to drive further and pay more would have an unquestionable impact to illegal dumping. This is evidenced by the huge problem in other fee-based municipalities places like Saipan and Guam have. A better solution would be to allow residents to drop waste at the transfer station located in the village and then transport the waste to the official dump site via dump trucks. This would allow a much higher level of oversight at the dump site, ensuring a higher level of compliance than exists now.

## Water restrictions

67I

What was communicated at the Public forum: The live fire range planned for the north end of Tinian extends into the channel used by recreational boaters and commercial ships. Under the current plan, this area would be periodically closed (for hours or days) for safety reasons. How these closures would be disseminated to the public was unclear and the DOD requested comments for how we as the community think they should be shared among the general public. It was news to the DOD personnel representing this part of the plan that this channel is used daily by boats carrying essential supplies to Tinian including food, gas, medicine, and supplies.

Comments to consider:

This channel provides critical transportation routes for boats carrying food, supplies, and medicine. Limiting access to this route increases risk to boaters, and threatens to interrupt Tinian's already limited access to goods arriving on island. This also poses safety risks to boaters on Saipan who may not know to access information channels reporting closures. It would also substantially impact CNMI tourism, as it affects some of the premier dive sites in the Marianas. These sites are accessed daily by dive shops based on Saipan and represent a significant source of tourism draw for our already struggling tourism industry. Besides the impacts of noise, this is probably the most imminent and pernicious threat of the current CNMI JMT plan.

## Impacts to tourism

67J

The current explosive range is set for development at the base of Mt. Lasso, near some of the best forest on Tinian. Noise from the range will be heard from Chigit and the Blowhole. The impacts of this on tourism is not currently being considered by the Military. Likewise, sections of the MLA will be periodically closed for exercises. As with water restrictions, how this will be communicated with the public is unclear. Although planned closures will be communicated in advance (not day of) how closures will be communicated to tour groups or their impacts on tourism on Tinian are not under consideration. Most people don't like hearing weapons of war while they are on vacation, or viewing a scenic outlook. It's hard to imagine these changes won't have a negative impact on tourism on Tinian. The EIS should more clearly communicate the impacts of this noise level to tourism.

## Comment 68

### Commentor Information

Name	Organization / Affiliation	Comment Format
Richard Farrell	N/A	website

*Legend: N/A = not provided*

### Text of Comment

Please see attached

# Public Comment on the Revised Draft Environmental Impact Statement (EISX-007-17-XMC-1747255459)

Submitted by: **Richard Dela Cruz Farrell**  
Date: **09/04/2025**

As a member of the Tinian community, I respectfully submit this comment on the Revised Draft Environmental Impact Statement (EIS) for the Commonwealth of the Northern Mariana Islands Joint Military Training, specifically addressing the proposed west-facing firing range within the Tinian Military Lease Area.

## Concerns About the West-Facing Firing Range

### 1. Impact on Interstate Commerce

- The western maritime transit corridor near Tinian is a key route for commercial shipping between the islands. Cargo vessels, fuel tankers, and supply ships depend on safe, dependable access through this corridor to deliver vital goods to Tinian, Rota, and Saipan.
- Creating a surface danger zone (SDZ) that extends westward would cause repeated disruptions to this crucial economic route. Even short-term closures or delays would boost fuel costs, delivery times, and overall shipping expenses, increasing the cost of living for island residents.

### 2. Impact on the Fishing Community

- The waters west of Tinian are vital to our fishing heritage and economy. Local fishermen—whether for subsistence or commercial purposes—depend on this area for safe navigation and access to abundant fishing grounds.
- Restricting access during live-fire training would harm livelihoods, food security, and recreational opportunities. This disruption is especially concerning given the limited access to fishing grounds available in other areas around Tinian.
- Fishing is not only an industry but also a cultural practice passed down for generations. Limiting access to these waters undermines both economic resilience and cultural identity.

## Community Recommendations and Requests for Mitigation

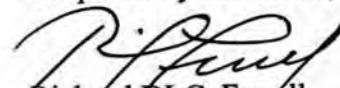
To protect the well-being of Tinian residents while recognizing the importance of national defense, we strongly urge the U.S. Marine Corps and cooperating agencies to adopt the following measures in the Final EIS:

1. **Reevaluate Firing Range Orientation:** Consider modifying the range layout to prevent west-facing SDZs from overlapping with maritime trade routes and heavily used fishing zones.
2. **Stakeholder Consultation:** Conduct regular consultations with local stakeholders—including shipping operators, the Tinian Community, and fishing associations—before finalizing training schedules that would restrict access to key waters.
3. **Advance Notification Protocols:** Implement transparent and timely public notice procedures, coordinated with the U.S. Coast Guard, so that fishers and commercial operators have adequate time to adjust operations.
4. **Economic Mitigation Measures:** When disruptions are unavoidable, mitigation measures should include compensation or offset programs. This could involve subsidies for fishers or support for the Tinian community coping with increased costs of goods and services.
5. **Community Benefit Agreements** should ensure that any adverse effects on commerce and fishing are offset by concrete community benefits, like investments in local infrastructure, emergency services, or maritime safety initiatives.

Tinian's residents have traditionally backed national defense efforts, understanding the island's strategic importance. Yet, such support should also consider our economy, cultural heritage, and daily livelihoods. The suggested west-facing firing range could unfairly burden residents by limiting access to waters vital for trade and fishing.

We respectfully urge the U.S. Marine Corps to reevaluate this range orientation and implement mitigation measures that protect both U.S. military readiness and the long-term well-being of the Tinian community.

Respectfully submitted,



Richard DLC. Farrell

Resident of Tinian

## Comment 69

### Commentor Information

Name	Organization / Affiliation	Comment Format
GERHARD SWORD	KKMP Foundatio	website

*Legend: N/A = not provided*

### Text of Comment

Our organization DOES NOT SUPPORT any live fire and ordinance testing on the Tinian Lands. There is a lot more work DOD has to do to make the land surviive after the bombs, rockets, mortars and other terrible munitions to be set off on the Tinian lands. Our livelihood in fisheries and farming will be totally destroyed by these "excercises" .

[Text of comment continues on the following page]

**CHALLENGING THE ADEQUACY OF THE CJMT EIS: PROTECTING TINIAN’S ENVIRONMENTAL, CULTURAL, AND PUBLIC WELFARE INTRODUCTION AND OVERVIEW (Section 4 CJMT).**

**Submitted by Gerhard R. Sword Small Business Owner.**



**8-12-25**

This document presents a comprehensive critique of the Commonwealth of the Northern Mariana Islands Joint Military Training (CJMT) Revised Draft Environmental Impact Statement (EIS) as it pertains to the island of Tinian. We write with urgency and a deep sense of responsibility to ensure Tinian’s long-term environmental integrity, cultural heritage, and public welfare are not compromised by proposed military activities. Our review finds that the CJMT EIS, in its current form, is **inadequate** in assessing and mitigating impacts on Tinian’s sole-source aquifer, fragile wetland ecosystems, and invaluable cultural resources. We highlight serious gaps between the EIS’s optimistic claims and the on-the-ground reality, drawing on current water quality data, historical precedents of military environmental damage, and the EIS’s own admissions. We urge the U.S. Department of Defense, CNMI government, and international stakeholders to recognize the **rights of the people of Tinian to clean water, cultural preservation, and environmental self-determination**, and to take the recommendations herein as actionable commitments.

The sections below detail our concerns and evidence in a structured manner, followed by clear recommendations. We cite relevant pages and figures from the CJMT EIS and associated documents to substantiate each point. In summary, Tinian’s community and environment face **unacceptable risks** under the proposed plans: contamination of the only potable aquifer, destruction of ecologically sensitive wetlands, irreparable harm to cultural sites, public health hazards, and loss of access to traditional lands and waters. We call for stronger protective measures, enforceable monitoring and remediation plans, and genuine respect for the rights and welfare of Tinian’s people.

**PROTECTING TINIAN’S SOLE AQUIFER AND WETLANDS**

**Tinian’s Sole-Source Aquifer:** Tinian relies on a single karst limestone aquifer for all fresh water. This aquifer’s porous nature and shallow water table make it **highly vulnerable** to surface-borne contaminants. The CJMT EIS acknowledges that Tinian’s geology is predominantly **porous limestone (karst)**, but it downplays contamination risks by citing soil chemistry factors. For example, the EIS asserts that because Tinian’s soils are neutral to alkaline, heavy metals like lead from munitions will be immobilized and unlikely to reach groundwater. Based on this assumption, the EIS concludes “the potential for significant contamination of groundwater is low” and declares impacts to groundwater quality “**less than significant**” with standard management practices. These conclusions are **overly optimistic** and not adequately supported by data. Karst aquifers have rapid pathways for water (and pollutants) through cracks and sinkholes, bypassing the soil’s

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filtering capacity. While neutral pH might reduce lead solubility in ideal lab scenarios, in real conditions of heavy rainfall, ground disturbance, and chemical mixtures, contaminants can still migrate quickly through limestone bedrock.

Crucially, CNMI’s own environmental regulators have contradicted the EIS’s complacency. The CNMI Bureau of Environmental and Coastal Quality (BECQ) emphasized that Tinian’s groundwater **meets the definition of a “sole-source aquifer”** under U.S. EPA criteria. This means the aquifer is the only significant source of drinking water for the island — if it becomes polluted or depleted, there is no alternative. BECQ’s assessment stresses that DoD provided no evidence to support its “less than significant impact” finding for groundwater contamination. In fact, BECQ flatly *disagreed* with Draft EIS’s claim that live-fire training poses negligible risk to groundwater, noting that the EIS lacked baseline contamination data and failed to propose timely monitoring during operations. It is unacceptable that **the Revised EIS still glosses over this critical vulnerability**.

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**Wetland Ecosystems at Risk:** Tinian hosts a few wetland areas – notably Lake Hagoi and the Mahalang and Bateha wetlands – which are ecologically and culturally significant (habitats for birds like the Mariana Common Moorhen and traditional foraging areas). Blasting, detonation, and construction near these wetlands pose risks of physical destruction, altered water flow, and pollution runoff. Yet the CJMT EIS provides only cursory mitigation measures. For instance, it notes that military aircraft will maintain a 1,000-ft altitude above wetlands like Lake Hagoi to minimize noise, but it says little about ground-based blasting impacts. There is **vague or no detail** on buffer zones around wetlands for demolition activities or how the military will prevent explosive residues and sediment from washing into wetland waters. The lack of specific safeguards is alarming, given that even small pollutant loads can eutrophy<sup>1</sup> a closed wetland or harm its wildlife. We remind the DoD that CNMI law prohibits certain hazardous activities near wetlands (e.g. fuel storage within 500 feet of wetlands) – any actions that risk wetland contamination would violate both the spirit of these protections and the EIS’s stated commitments.

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**Groundwater Modeling and Water Supply:** The EIS’s groundwater modeling appears to focus more on water *quantity* (sustainable yield) than quality. We acknowledge that the EIS quantified the military’s water demand and compared it to Tinian’s aquifer recharge: approximately 372 million gallons per year total demand (military + civilian) vs. an estimated sustainable yield of 4–5 billion gallons per year. On paper, this suggests extraction is only ~7–9% of recharge, which the EIS deems a “less than significant” impact to availability. However, **water quality** is the greater concern. Increased pumping near coastal wells could induce saline intrusion into the aquifer, a risk the EIS notes but downplays. Even the *Draft EIS* admitted that pumping new military wells might cause saltwater intrusion and that the effect of operating certain wells concurrently “has not been

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<sup>1</sup> The process or state of a body of water becoming excessively rich in minerals and nutrients, particularly nitrogen and phosphorus

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quantified”. BECQ has voiced concern that any such intrusion would have “profound effects on the drinking water for the Tinian community,” which already struggles with freshwater capacity. In short, the EIS does not fully assure that Tinian’s limited water supply will be safe and sufficient. Before moving forward, **independent hydrogeologic studies** should verify that pumping plans will not salinize community wells, and **contingency plans** must be in place if intrusion is detected (e.g. reducing extraction rates or providing alternative water sources to the island).

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**Surface Contamination and Karst Infiltration:** The most acute threat to the aquifer is contamination from surface activities: munitions constituents (explosive chemicals, heavy metals), spilled fuel, solvents, and other hazardous materials from training and construction. In a karst setting, pollutants on the ground can migrate to groundwater in days – far faster than in a clay or basaltic aquifer. The CJMT EIS states that most live-fire munitions will be expended in target areas with “moderately permeable, shallow rocky clays” or deeper soils, and claims that the limited presence of basal groundwater in those impact areas, combined with range management practices, will keep risk to groundwater low. We find this reasoning **unconvincing**. First, “moderately permeable” soil still permits percolation – especially after being cratered by explosives. Second, the northern two-thirds of Tinian (where the Military Lease Area is located) is riddled with sinkholes and solution cavities; even a “deep” water table (~60+ meters in some spots) is not protective if there are fast conduits. Third, the EIS does not discuss the fate of **perchlorates, RDX, TNT,** and other energetic residues that are far more mobile in water than lead. These contaminants have been found to leach through soils into groundwater at other live-fire ranges. The **absence of baseline data** in the EIS is telling – DoD has not tested Tinian’s soil or groundwater for these substances pre-training (aside from limited investigations around old WWII sites). Without baseline and ongoing monitoring, any assertion of “no significant contamination” is speculative at best. In fact, current evidence already suggests a problem: due to past WWII activities, “**debris, UXO, and other munition constituents**” are present in Tinian’s soils today, and they “**may present persistent adverse impacts**” to the island’s water bodies. It is disturbing that the EIS does not build on this known fact with a robust plan to prevent further contamination.

## EVIDENCE OF EXISTING CONTAMINATION AND COMPLIANCE ISSUES

Tinian’s environment is already suffering residual contamination from both historic warfare and recent military-related activities. These **real-world examples** cast doubt on the CJMT EIS’s assurances and highlight the need for stronger oversight:

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**Legacy of WWII and Past Training:** Tinian (and neighboring Saipan) were battlefields in World War II, and to this day ordnance and pollutants from that era linger. A recent scientific study of marine sediments off Saipan’s west coast (conducted in 2008–2009) found **elevated levels of mercury, copper, zinc, and other metals**, which researchers linked to the U.S. invasion of Saipan in 1944. The mercury was traced to **mercury fulminate**; an explosive primer used in WWII artillery shells. In other words, bombs dropped over 75 years ago are *still* leaching toxins into the

environment. The study’s authors and CNMI environmental officials concluded that “**we can only expect similar long-lasting contamination**” from the proposed live-fire training on Tinian and Pagan. **This sobering context is missing in the EIS.** The DoD must acknowledge that without extraordinary precautions, today’s training rounds could become tomorrow’s persistent pollution, just as happened after WWII.

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**UXO and Hazardous Debris:** Unexploded ordnance (UXO) and military scrap scattered around Tinian’s landscape pose both safety and pollution hazards. The CJMT project would greatly increase the volume of munitions used on Tinian, inevitably leading to more UXO in the soil and coastal waters. The EIS states that range clearance protocols will be followed: units must sweep for duds and debris after training, and periodic thorough clearances are mandated under the Marine Corps’ range management order. We appreciate these procedures on paper, but experience shows they are not fail-proof. UXO is often missed (especially small or buried items), and over time the casings corrode, releasing explosives and heavy metals into soil and groundwater. The EIS even admits that “**salt spray and humidity may accelerate deterioration of [ordnance] casing**”, potentially releasing contaminants. Yet it simultaneously claims that because the release might be slow and lead doesn’t travel far, the risk is negligible. This **internal inconsistency**, acknowledging corrosion and release on one hand, then brushing aside its significance on the other – is unacceptable. We insist that **all UXO and munitions debris must eventually be removed** if Tinian’s environment is to be truly protected. The final plan should include funding and a schedule for UXO clearance *during and after* the training activities, not merely at the end of some decades-long period.

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**Recent Contamination by DoD Contractors:** A glaring example of environmental harm on Tinian occurred in 2020–2021, when a private contractor (hired by the U.S. military Seabee unit) was found to be **illegally dumping raw sewage** into Tinian’s municipal dump. The dump is an unlined landfill located upslope of coastal waters. Instead of using the designated leaching field, the contractor’s pumper truck discharged wastewater directly into the ground at the dump. This malpractice resulted in a surge of bacterial contamination (enterococci) and nutrient pollution in downstream coastal waters, with measured violations of water quality standards jumping dramatically. Tinian’s environmental agency investigated and penalized the company in 2021, after which beach contamination levels dropped back down. While the prompt response by local regulators is commendable, the incident is a **red flag**. It shows that **DoD’s oversight of its contractors was lacking**; without local whistleblowers or enforcement, the pollution could have continued unchecked. It also underscores how vulnerable Tinian’s groundwater and nearshore waters are when basic rules are flouted. If sewage effluent can cause a spike in contaminants, consider how a spill of diesel fuel, a mismanaged chemical, or years of spent munitions could silently impact the aquifer. The CJMT EIS’s mitigation plan must include **stronger enforcement mechanisms** to prevent such violations – simply assuming contractors or units will follow best practices is not enough. Additionally, this incident reveals a broader infrastructure need: Tinian

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has **no modern sewage treatment plant or lined landfill**. The military’s presence will exacerbate waste generation, and it has a responsibility to invest in proper waste management facilities (e.g. a fully lined, monitored landfill cell and wastewater treatment capacity) rather than relying on substandard local systems. Currently, all residents use septic systems and an “unlined dump” for solid waste, which already causes groundwater leachate issues. An influx of military personnel and activities will multiply these risks unless mitigated with new infrastructure and strict waste disposal protocols.

In summary, the evidence of **existing** contamination – from WWII ordnance in soils to recent illegal dumping – proves that Tinian’s environment is **fragile and under strain**. The CJMT EIS must be held to the highest standard in preventing any additional pollution. We are concerned that the EIS does not adequately incorporate these lessons. There is a pattern in which military activities (even peacetime training and logistics) have left contamination that local communities then have to discover and clean up years later. This pattern must end with Tinian; **prevention and accountability must be paramount**.

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#### **HISTORICAL PRECEDENTS OF MILITARY ENVIRONMENTAL DAMAGE**

The people of Tinian are not alone in facing the impacts of militarization. Around the world – and within the United States and its territories – we have seen **repeated patterns of environmental destruction and inadequate cleanup** following military use. The CJMT EIS notably fails to mention or learn from these cases. We raise them here as cautionary examples that underscore why Tinian’s concerns are justified and why robust safeguards (not vague promises) are needed. Key examples include:

**Vieques, Puerto Rico:** The island of Vieques was used by the U.S. Navy as a live-fire training range for over 60 years (up until 2003). The Navy left without fully cleaning up the munitions and toxins from decades of bombing. The consequences have been dire. **Unexploded ordnance and munitions residues continue to leach contaminants** into Vieques’ soil and groundwater. Environmental damage is evident in wiped-out marine life in some areas and pollutants entering the food chain. The human toll is equally alarming: Vieques’ 9,300 residents have a cancer rate **27% higher** than the rest of Puerto Rico, and cancer patients die at a rate **55% higher** than on the main island. While debate continues on attributing causation, the correlation with military pollution is too strong to ignore. **In the late 1990s, the EPA cited the Navy for over 100 Clean Water Act violations for discharging toxic metals** (lead, cadmium, arsenic, cyanide) into Vieques’ waters. To this day, large areas of Vieques remain closed as an EPA Superfund cleanup site, with ongoing removal of UXO and contamination.

**Lesson for Tinian:** Once a training range is established, **it is incredibly difficult to avoid severe long-term contamination**, even with eventual cleanup efforts. The CJMT EIS’s claim that routine range management will prevent such outcomes is not borne out by Vieques’s experience.

**Kaho‘olawe, Hawai‘i:** The island of Kaho‘olawe, traditionally sacred to Native Hawaiians, was bombed by the U.S. Navy and Air Force from World War II through 1990. After it was finally returned to the State of Hawai‘i, the U.S. military spent approximately **\$400 million** in cleanup, yet only a fraction of the ordnance was cleared. In fact, the intensive cleanup between 1994 and 2004 managed to remove surface UXO from only ~68% of the island; merely **9%** of Kaho‘olawe was cleared to a depth of 4 feet, and fully **30%** of the island (especially in difficult terrain) remains uncleared and dangerous. Large swaths of the landscape are contaminated or inaccessible, and erosion from decades of bombardment has stripped topsoil, causing ongoing ecological damage (an estimated 1.9 million tons of soil erode into the ocean annually as of 2014). Even today, community groups working to restore Kaho‘olawe must contend with the risk of unexploded bombs “emerging from the blowing red dirt”.

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**Lesson for Tinian:** Even with significant funding and the best intentions, **once an island is used as a bombing range, it will never be fully restored**. Any assurances in the CJMT EIS that “periodic clearance” will handle UXO **must be met with skepticism**. Kaho‘olawe’s partial cleanup shows how difficult and costly it is to remove munitions once they’ve been scattered over an island. Moreover, cultural damage can last for generations; Kaho‘olawe’s sacred sites were shattered and access for Native Hawaiians is still limited and contingent on safety constraints. Tinian, likewise, has culturally significant sites in the military lease area that could be forever marred.

**Marshall Islands (Pacific Proving Grounds):** During the Cold War, the Marshall Islands (notably Bikini Atoll and Enewetak Atoll) were the site of extensive U.S. nuclear testing. While not a direct parallel to conventional training, the example is pertinent to illustrate lasting harm. Bikini Atoll was transformed from a lush tropical paradise into what one scholar described as a “**radioactive wasteland**”. Bikini’s people and those of nearby atolls like Rongelap were displaced, many suffering radiation illnesses. **Seventy years later,**

**Bikini Atoll** remains uninhabitable. In 2016, independent researchers still found radiation far above safe resettlement levels. The people displaced from their homeland have spent generations as “Pacific nomads,” unable to return. The United States has paid out hundreds of millions for compensation and cleanup, yet the damage to land and culture is, for all practical purposes, permanent.

**Lesson for Tinian:** The Marshallese were told the tests were “for the good of mankind” and that they’d be cared for. Those promises were broken, leaving a legacy of mistrust. As Secretary of State Henry Kissinger reportedly said when briefed on displacing Marshall Islanders: “*There are only 90,000 of them out there. Who gives a damn?*”<sup>2</sup> CJMT is not nuclear, but the principle is the same: **large military operations carry low-probability, high-consequence risks that fall heaviest on indigenous communities**. Tinian has one aquifer. Pollute it, even once, and the island can become unlivable or force relocation.

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<sup>2</sup> <https://www.pbshawaii.org/insights-on-pbs-hawaii-giving-a-damn/>

**This is not hyperbole; it is a credible worst-case scenario** the EIS must explicitly model, prevent with enforceable safeguards, and accept liability for. Until it does, the plan fails the most basic test: do no irreversible harm.

**Saipan (Northern Mariana Islands):** Closer to home, Saipan itself bears scars from both WWII and past military activities during the Trust Territory period. For instance, in the village of **Tanapag, Saipan**, dozens of electrical capacitors left by the U.S. military in the 1960s leaked **polychlorinated biphenyls (PCBs)** into the soil over decades. By the time this was discovered in the 1990s, the area had **one of the highest PCB contamination levels in the Pacific**, and residents' health was potentially affected. A Superfund-level cleanup had to be undertaken by the U.S. Army Corps of Engineers in the 2000s to remove contaminated soil and treat affected areas. Another study (Denton et al., 2010) found that Saipan's lagoon had sediment "spikes" of mercury and other metals from WWII ordnance, as mentioned earlier. These examples underscore a pattern: **military pollution often only comes to light years later**, and remediation (if it happens at all) is slow and costly.

**For Tinian, we do not want history to repeat itself.** The time to prevent another Tanapag or another UXO dumpsite is now, in the planning phase – not decades from now when the damage is done.

In highlighting these cases – Vieques, Kaho'olawe, the Marshall Islands, Saipan – we echo BECQ's 2015 comment that the CJMT EIS should **explicitly analyze these precedents** to "provide background and context for what could be expected in the CNMI". The Draft EIS's failure to do so was a missed opportunity, and the Revised EIS still does not adequately convince us that "it won't happen here." **We demand that the Department of Defense demonstrate, in concrete terms, how it will avoid repeating these tragic environmental outcomes on Tinian. General assurances are not enough; THE EIS MUST CONTAIN SPECIFIC, ACTIONABLE MEASURES, AND ENFORCEABLE COMMITMENTS, THAT ACKNOWLEDGE THIS HISTORY AND BREAK FROM IT.**

#### **DEFICIENCIES IN MITIGATION, MONITORING, AND ENFORCEMENT PLANS**

The CJMT EIS relies heavily on mitigation measures and best management practices (BMPs) to reduce anticipated impacts. However, many of these measures are described in **vague or non-committal terms**, and the EIS lacks clear plans for monitoring and enforcement to ensure these measures are effective. This section calls out some key weaknesses:

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**Groundwater and Water Quality Monitoring:** The EIS does not present a robust monitoring regime for early detection of groundwater contamination. It suggests that periodic testing of soil and water will be conducted, but specifics are scant. For example, will there be **monitoring wells** downstream of ranges and the fuel storage areas, with quarterly sampling for explosives, perchlorate, heavy metals, and hydrocarbons? Will data be shared transparently with CNMI agencies and the public in real-time? The EIS needed to spell this out, but it did not. BECQ noted

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in comments that DoD did “not propose to test for the chemical fate of munitions constituents until after one year” of training – leaving a huge gap where contamination could occur undetected. There is also no baseline dataset for many contaminants, meaning the EIS has no yardstick for “before vs. after.” This is a glaring flaw. **Recommendation:** At minimum, a comprehensive baseline groundwater and soil sampling campaign must be conducted *before* any training begins (for parameters including but not limited to nitrates, phosphates, pH, conductivity, explosives (TNT/RDX), perchlorate, PAHs, solvents, metals like lead, copper, mercury, etc.). Then, a continuous monitoring plan should be implemented with independent oversight: e.g. biannual testing of all observation wells and select down-gradient civilian wells, with results reported to CNMI BECQ. If any contaminant approaches or exceeds CNMI or EPA drinking water standards, an immediate halt to the contributing activity must be triggered and remedial action taken. The current EIS does not contain such a failsafe mechanism.

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**Blasting and Vibration Impacts Near Cultural Sites:** The EIS recognizes that certain historic sites on Tinian, such as the North Field airstrips, World War II-era bunkers and landing beaches, are part of a National Historic Landmark District, and that by law the DoD must “minimize harm” to these landmarks. It also acknowledges other cultural resources like prehistoric latte stone sites, historic ranch features, and sacred areas used by the community. However, the mitigation measures for cultural resources are mostly procedural (consultation under Section 106 of the National Historic Preservation Act, archaeological monitoring during construction, etc.). The EIS does not directly address how **blast pressures, noise, and earth vibration** from heavy detonations might physically affect historic structures (for example, the integrity of old concrete pillboxes or bomb magazine structures from WWII), or how noise and intrusion might impact the sanctity of cultural landscapes and practices. Blasting near caves or limestone rock shelters that might hold cultural artifacts could cause collapses or damage that no amount of documentation can undo. We found no specific buffering guideline in the EIS such as minimum standoff distances from known cultural sites for explosive training events. **This is a significant omission.**

**Recommendation:** All known cultural sites, especially those eligible for or listed on the National Register of Historic Places, should have exclusion zones around them where no high-explosive detonations or construction vibration can occur within a certain radius (determined by engineering analysis). Additionally, real-time vibration sensors should be placed at key historic structures when nearby blasting is planned, to monitor and ensure thresholds are not exceeded. If vibration or overpressure levels approach damaging thresholds, activities should cease. The final EIS/Record of Decision should commit to specific protective buffers for Tinian’s historic and sacred sites – mere “consultation” is not enough to guarantee preservation.

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**Wetlands and Wildlife Mitigations:** As noted, aside from an altitude restriction for aircraft over wetlands, **the EIS provides little detail on protecting wetland ecology.** We consider this a deficiency that needs rectification. For instance, Lake Hagoi is habitat to the endangered Mariana common moorhen. The EIS should include measures such as: no firing of weapons or use of high

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explosives within a certain distance of Lake Hagoi and other wetlands; erosion control around any construction near wetland catchments; no use of toxic targets (e.g. avoid lead or chemical-biocide targets) that could introduce poisons. If blasting is to occur in the watershed of a wetland, water quality monitoring of that wetland should be done to check for any spike in turbidity or contaminants. **The EIS also should clarify how it will enforce these measures.** It is unclear which agency or body will ensure compliance on-site – Will Range Control also double as environmental monitor? If so, are they trained for that role, and do they have authority to halt exercises if, say, a fuel spill happens or if protective measures are not in place? The document is silent on these enforcement logistics. **Recommendation:** A dedicated Environmental Surveillance and Compliance Team (including CNMI environmental representatives) should be established for CJMT activities. This team would have unfettered access to training areas to observe activities, verify mitigations (fuel spill kits present, dust suppression, etc.), and authority to call time-outs if an imminent environmental hazard is observed. Without independent or empowered oversight, even well-intentioned mitigations can fail.

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**Handling of Hazardous Materials and Waste:** The EIS states that all hazardous waste from construction will be shipped off-island and that any UXO found during construction will be handled per applicable regulations. However, BECQ’s review in 2015 noted **confusion about where these wastes would go**, since Guam (the nearest hub) does not have a permitted RCRA Subtitle C hazardous waste landfill, meaning off-island likely means to the U.S. mainland. The Final EIS needs to confirm the disposal path for hazardous wastes and ensure it is feasible and funded. Moreover, **operational** hazardous waste (during training) is **not clearly addressed**, spent munitions, polluted target debris, etc., all count as hazardous waste. The **EIS should explicitly commit** that the military regularly remove these materials from Tinian and dispose of them properly off-island (or treat them appropriately on-island if a safe method exists). Any temporary storage of hazardous waste on Tinian must be in lined, contained, weather-protected facilities, not left on bare ground. This level of detail is missing. The same goes for fuel handling: we need confirmation that all fuel tanks for the Base Camp or airfield exercises will have secondary containment and leak detection. Tinian’s history, as mentioned, includes rusty WWII fuel tanks that leaked into groundwater because they were just set on soil. The DoD must not repeat that mistake; any new fuel storage on Tinian should be double-lined, with berms, and ideally kept 500+ feet from any wetland or shoreline (complying with CNMI regulations). The EIS implies such measures but does not explicitly map them out. We expect these details to be ironed out in any final decision, in binding form.

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**Enforcement and Accountability:** Perhaps the most troubling aspect of the mitigation plan is the question of **“Who will enforce it?”**. The CJMT proposal significantly increases the military’s footprint in the CNMI, but jurisdictionally the Military Lease Area is still CNMI land (leased, not owned). CNMI agencies like BECQ, Department of Lands and Natural Resources (DLNR), and others should have a say and oversight role. The EIS should clarify how local environmental laws

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and permit conditions will be enforced. For example, will CNMI conservation officers or DEQ inspectors be allowed on-site during exercises to ensure compliance with erosion control or protected species measures? If monitoring finds a violation (say, a water quality exceedance or an unreported spill), what penalties or corrective actions are triggered, and by whom? The document presently gives the impression that the military will self-regulate via Range Control and internal protocols. Self-regulation is not sufficient, as demonstrated by the earlier sewage dumping incident (which was caught only by external inspection). Therefore, an **enforceable mechanism**, such as a Memorandum of Agreement giving CNMI regulatory personnel authority to conduct inspections, or the establishment of an independent environmental ombudsman, is necessary. Furthermore, the DoD should commit to consequences if standards are violated: for instance, a bond or dedicated fund that can be used for cleanup in case of contamination events, and suspension of training activities until issues are remedied. **Without these teeth, the mitigation plan risks being a paper promise.**

In summary, while the CJMT EIS lists many mitigative intentions, it **lacks specificity, monitoring rigor, and clear enforcement provisions**. We are calling for these gaps to be filled with concrete plans. Mitigation measures should not be just optimistic statements; they must be **binding commitments** with a system to ensure they are carried out to the letter. The people of Tinian will hold the DoD to its word, and thus that word must be made ironclad.

### **IMPACTS ON PUBLIC HEALTH, CULTURAL PRACTICE, AND LOCAL ECONOMY**

Beyond the biophysical environment, the CJMT proposal stands to significantly affect Tinian's people and way of life. The EIS, as a NEPA document, is required to consider socio-economic impacts and environmental justice, but we find its treatment of these issues to be **insufficient**. Our concerns include:

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**Public Health Risks:** Water is life, and as detailed, any contamination of Tinian's aquifer would directly endanger public health – whether through acute chemical exposure or long-term accumulation of toxins in the food chain. The community's health could also be affected by increased **dust and air pollution** from construction and training (particulate matter, emissions), noise stress, and potential accidents (e.g. a wayward munition or wildfire). The EIS's Public Health and Safety chapter mostly emphasizes the safety of military personnel and the public during training operations (e.g. preventing trespassers during live-fire, managing explosives safely). It concludes that with protocols, there would be no significant health and safety impacts – **but this overlooks subtler health pathways**. For instance, **the ingestion of fish or crops contaminated by runoffs is not adequately discussed**. Tinian's residents still practice subsistence fishing and farming to some extent. If UXO and munitions are left in the field or near shore, **heavy metals and explosives can end up in fish** (as seen in Vieques, where studies found elevated carcinogens in seafood). We urge that a thorough **health risk assessment** be carried out, covering potential exposure to munitions constituents, noise, and other stressors. **Medical monitoring** might even be warranted for the population over the long term (similar to what is being demanded in Vieques). At the very least, the military should fund ongoing testing of catchment water, crops, fish, and

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other locally sourced foods for contaminants, to ensure residents are not being slowly poisoned by the training activities. If the CJMT EIS is truly confident in “no significant contamination,” then the DoD should have no objection to such monitoring to verify that claim.

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**Restrictions on Land and Ocean Use:** Under the proposed action, large areas of Tinian (the entire Military Lease Area, which is roughly two-thirds of the island) will see **increased frequency of closures** for military training. This will directly limit public access to places that residents currently use for recreation, subsistence, and cultural practices. Beaches and waters that fishermen and families use may be off-limits during exercises. The EIS acknowledges this in part, but likely underestimates the impact. Currently, the MLA is leased but not constantly active; local people can request access to certain sites and have traditionally enjoyed some freedom when no training is happening. With CJMT’s heavier tempo, those opportunities shrink. As BECQ pointed out, the

**DEIS did not adequately address the impact on tourism and livelihoods** – for example, scuba dive operators on Tinian and Saipan rely on dive sites around Tinian (including the famed dumping ground wrecks and coral areas in the MLA waters). If artillery firing or beach landings regularly churn up sediment or force ocean closures, it could “**potentially put some [operators] out of business**”. The local tourism economy, already fragile, cannot afford such losses. Similarly, if nearshore reefs are degraded by sediment or explosions (analogous to “sandblasting” a reef with landing craft, as one comment described it), the fish stocks will decline, hurting subsistence fishermen and cultural fishing practices. The EIS should have – but did not – outline a plan to compensate or accommodate local users who will be displaced from traditional areas.

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**Recommendation:** DoD should establish a **Community Access Plan** that clearly delineates which areas (land or sea) are restricted and when, and conversely, which areas will always remain accessible to residents. Culturally or economically important sites should, to the maximum extent, be left accessible. If certain sites must be closed, provide alternatives or designate limited windows when residents can enter (e.g., if a shrine or fishing spot lies in the range, coordinate cease-fire windows to allow visits under supervision). Additionally, **a fund could be set up to support local businesses** that suffer economic harm from range activities (for instance, if dive sites are closed for long periods, compensate dive shop owners for lost revenue). These measures would show good faith and respect for the local economy and customs, which are inseparable from the land and sea.

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**Cultural Preservation and Self-Determination:** Tinian’s cultural heritage is rich – from the Latte period archaeological sites that speak of Chamorro ancestors, to Spanish period vestiges, to World War II relics, to continuing practices like ranching, fishing, and gathering. The EIS identifies many of the known historic sites, but **culture is more than static sites**; it’s also about ongoing relationships with the land. The military training proposal threatens to erode those relationships by fencing off large tracts and subjecting them to loud, and at times violent, activities incompatible with traditional use. We emphasize that **cultural resources include sacred landscapes and practices**, not just artifacts in the ground. For example, if islanders have traditionally gone to certain wild locations in the MLA to hunt or collect medicinal plants, or simply to feel a connection

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with their ancestors, those practices could be lost. **The EIS does mention access limitations** as a potential impact and suggests that these would be mitigated by scheduling around important cultural events where possible. However, the community was not fully consulted on what they consider “important” or how the training might inadvertently desecrate sites. Blasting near a known ancient village site could be seen as sacrilege; even if the site is not physically hit, the act of firing in its vicinity can be culturally offensive. This intangible impact is hard to quantify, but it is **very real** to the people. It goes to the heart of environmental self-determination: the people of Tinian have the right to say that certain places or practices are too sacred or vital to be disrupted by any outsider, including the U.S. military. We call on decision-makers to heed the voices of Tinian’s leadership and community, who have repeatedly expressed that they do not want their island turned into a perpetual war games site without strict limits and respect for their heritage. The **CNMI Constitution** enshrines protections for cultural traditions and the inherent rights of its people over their natural resources. The EIS and the eventual Record of Decision should explicitly affirm that nothing in the CJMT project will supersede the people’s right to protect their water and sacred places. In practical terms, this means if a conflict arises between training schedules and a cultural need (say, a funeral at a clan cemetery within the MLA, or a cultural harvest season in the forest), the cultural need should have priority.

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**Psychosocial Impacts:** Though harder to measure, **the presence of intensive military activity can have psychosocial effects on a small community.** Vieques, for example, reported high levels of anxiety and disruption from constant bombing noise before the range was closed. Tinian could face similar issues: loud noise from artillery, low-flying military aircraft, and the general stress of militarization can affect mental health and community well-being. Children in particular could experience fear or confusion from hearing explosions if not properly forewarned and educated. **The EIS should ensure robust community engagement and notification for each exercise** (which it mentions in context of public safety notices), but beyond that, there should be support (perhaps counseling services or community liaisons) to help residents cope with the changes. Ideally, the DoD would limit the most disruptive activities to certain times of day and avoid nighttime live-fire that could terrorize people in their homes. Clear two-way communication channels are necessary so that residents can voice concerns or report incidents (for example, if a stray round starts a bush fire on private land, or if blast noise causes structural damage to someone’s home, the military must respond and make amends immediately).

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In essence, the CJMT project is not just an “environmental” issue; **it is a human issue.** The land, water, and culture of Tinian are intertwined with the lives of its people. An EIS that inadequately safeguards one is inevitably harming the other. We implore the responsible agencies to treat the people of Tinian as equal stakeholders – not as obstacles to work around – and to honor their right to a healthy environment and cultural continuity. This includes respecting their wishes if they say no to certain activities. Development cannot be called “sustainable” or “responsible” if it rides roughshod over a community’s well-being.

## RECOMMENDATIONS FOR ENVIRONMENTAL PROTECTION, MONITORING, AND ENFORCEABLE COMMITMENTS

To address the shortcomings identified, we offer the following **recommendations and requirements**. These are proposed as conditions that must be integrated into the final EIS decision and any Record of Decision or binding agreement, to ensure that Tinian's environment and people are genuinely protected. Each recommendation corresponds to issues raised above:

**1. Formally Designate Tinian's Aquifer as a Sole-Source Aquifer:** Initiate the process with U.S. EPA to designate the Tinian aquifer as a Sole Source Aquifer under the Safe Drinking Water Act. This designation (for which Tinian appears eligible) would mandate an extra review of federally funded projects to ensure no aquifer contamination. Even if the CJMT proceeds, this status would underscore the importance of protective measures and could legally bind DoD to higher water protection standards. It sends the message that **contaminating Tinian's only water source is not an option.**

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**2. Comprehensive Baseline and Ongoing Environmental Monitoring (with Public Transparency):** Before any construction or training begins, conduct a comprehensive baseline survey of soil, groundwater, surface water (wetlands and coastal), and biota (fish, shellfish, reef sediment) for contaminants of concern. Thereafter, implement a long-term monitoring program with sampling at least semi-annually (and more frequently during intensive training periods). Parameters should include: heavy metals, explosive residues (RDX, HMX, TNT, perchlorate), petroleum hydrocarbons, solvents, nutrients, bacteria (for water), etc. All monitoring locations and parameters should be decided in consultation with CNMI BECQ and local stakeholders. **Crucially, the data from this monitoring must be made public in real-time.** We recommend an online portal where test results are posted, and an annual independent audit of the data. If contaminant levels show a rising trend or exceed safety thresholds, an immediate investigation and remediation action is triggered, and related training activities pause until resolved. This monitoring regime should be funded by the DoD but executed or overseen by independent experts (for credibility). Trust must be earned through transparency.

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**3. Strengthen Hazardous Material Controls and Emergency Response:** All fuel storage and hazardous material storage on Tinian must have secondary containment and abide by CNMI siting regulations (e.g., no tanks near wetlands or shoreline per NMIAC §65-5-210). A detailed Spill Prevention, Control, and Countermeasure (SPCC) plan should be developed and shared with CNMI authorities, including designated response teams and equipment stockpiles on-island to respond to any fuel or chemical spill *immediately*. Drills for spill response should be conducted regularly with local participation. Additionally, establish a requirement that any unexploded ordnance found *post-training* (whether by military teams or civilians stumbling upon them) will be promptly disarmed and removed by DoD EOD units. There should be a 24/7 hotline for residents to report suspected UXO or contamination events, linked directly to a response mechanism.

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**4. Enforceable Mitigation Agreements (Monitoring, Enforcement, Penalties):** Good intentions in the EIS must be codified into an agreement – perhaps a Memorandum of Agreement (MOA) or similar, between DoD and the CNMI Government. This agreement would list each mitigation measure and how it will be enforced, including the role of local agencies. It should include clauses such as: “If monitoring indicates contamination X above Y level, DoD will cease the related activity and remediate to Z standard within T timeframe,” or “If DoD fails to perform ABC mitigation, it will fund an independent contractor chosen by CNMI to do it.” Essentially, create **accountability**. The agreement could also include financial assurances. For example, DoD could be required to post an **environmental damage bond** or establish a **trust fund** that CNMI could draw upon in case of remediation needs. This would alleviate the fear that the local government will be left holding the bag if things go wrong. Remember, promises of “cleanup later” are only as good as the funding and political will to execute them. We suggest an upfront commitment of resources for environmental management. There should be a monitor from the Mayors office and paid for by DOD to assure that all agreements, safety standards and training are adhered to.

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**5. Buffer Zones and Exclusion Areas:** Identify and enforce specific buffer zones where no live-fire or destructive activities will occur. These should include: a buffer around Lake Hagoi and other wetlands (e.g., no demolition within a certain radius, and no soil disturbance that could alter the hydrology feeding the wetland); buffers around known cultural sites and historic structures (as discussed, perhaps a few hundred meters where appropriate, subject to expert recommendations); and marine protected zones (reefs that are off-limits to any landing or amphibious training to preserve marine life, potentially compensating by using already impacted areas like old WWII beachheads instead of pristine reefs). These spatial protections should be mapped clearly and treated as no-go zones in the Range Management Plan. Range Control must be trained to enforce them strictly, and violations should carry consequences (e.g., a unit that accidentally fires into an exclusion area must answer for it and assist in any damage assessment and restoration).

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**6. Community Engagement and Access Accommodations:** Create a formal **Community Liaison Office** for CJMT activities on Tinian. Its role would be to communicate schedules, facilitate community requests (for land access when safe, etc.), and hear complaints or issues. The community should not be left wondering when and where they can go on their own island. At least a month in advance, publish training schedules (to the extent security allows) so that fishermen, farmers, and tour operators can plan around closures. If an important cultural or community event requires access to the MLA, the military should adapt (e.g., halt training for that day at that location). The liaison office can coordinate this. Moreover, the DoD should consider funding certain community initiatives as goodwill – for example, improvements to public water infrastructure, scholarships for environmental science students from Tinian, support for cultural preservation projects – as **offsets** for the community’s burdens. While not a substitute for prevention, such investments show that the military understands it must give back to the host community.

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**7. Periodic Review and Adaptive Management:** The situation on Tinian **should not be “set and forget.”** We recommend that the CJMT activities be subject to a **periodic environmental review** – for instance, a comprehensive review every 5 years, with opportunity for CNMI and public input, to assess whether impacts are occurring as predicted, whether mitigations are working, and whether adjustments are needed. NEPA allows for supplemental EISs if new information arises. Committing to a periodic check-in effectively builds adaptive management into the project. If, after a few years, data show that, say, certain training activities are causing more environmental damage than anticipated (or community impact), then DoD must be willing to modify or curtail those activities. This could be formalized via an adaptive management plan in the EIS Record of Decision.

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**8. Contingency for Cumulative Build-up:** Although this comment focuses on the CJMT EIS, we note that military activities in the Marianas have a way of growing (the divert airfield, possible future basing, etc.). It must be stated that **Tinian cannot handle unlimited militarization without irreparable harm**. Therefore, as a policy recommendation, any further expansion beyond what is in this EIS should trigger a fresh evaluation with the presumption that if carrying capacity is exceeded, it will not proceed. In other words, treat the CJMT as the maximum footprint, and enforce that through planning. This ties into the self-determination principle: the people of Tinian, through their elected leadership, should have a decisive voice if any changes or intensification is proposed down the line.

Each of these recommendations is made in the spirit of **constructive, proactive protection**. We do not oppose national defense needs; rather, we insist that defense not come at the cost of Tinian’s destruction. The above measures, if adopted, would go a long way toward assuring the community that the CJMT can be compatible with our island’s future. Without them, however, the EIS remains a document of unfulfilled assurances.

## **CONCLUSION: UPHOLDING TINIAN’S RIGHTS AND FUTURE**

In conclusion, we find the CJMT Environmental Impact Statement inadequate in its current form to protect Tinian’s long-term environmental, cultural, and public welfare. The document’s analyses and proposed mitigations **do not fully account for the island’s vulnerability** or the Department of Defense’s track record in similar situations. **Water** – the source of life – is at the heart of our concerns. Tinian’s sole aquifer and associated wetlands must be defended with the utmost rigor. **Cultural resources** – tangible and intangible – must not become collateral damage of war games. And **the people of Tinian must not be treated as mere onlookers** to decisions that affect their homeland at every level. International human rights principles, U.S. environmental justice policy, and basic ethics all dictate that the indigenous and local population’s rights to clean water, a healthy environment, and cultural preservation be paramount in any development project, especially one led by a government entity.

We urge the U.S. Department of Defense and cooperating agencies to **seriously revisit** and revise the CJMT plans in light of the issues raised. At minimum, the mitigation, monitoring, and enforcement measures must be strengthened and made enforceable as outlined. Ideally, alternatives that reduce the scope of live-fire on Tinian should be considered (for example, could some high-impact training be shifted to locations with less fragile resources, or scaled back?). If the CJMT EIS cannot guarantee Tinian’s aquifer will remain clean, then it fails a basic tenet of sustainability and should not move forward as is.

The people of Tinian, through many public comments and testimonials, have expressed that they value their island’s natural beauty, their clean waters, and their cultural sites **above any promise of economic stimulus that militarization might bring**. We echo that values statement here. Economic development and security partnerships are welcome, but not at the price of our children’s health or our heritage. We stand ready to work with the Department of Defense to find solutions that truly mitigate harm – but we also stand firm that we will oppose actions that we know, in our hearts and with supporting evidence, to be harmful to our community.

Finally, we remind all stakeholders that **environmental self-determination** is a principle whose time has come. Just as Kaho‘olawe was eventually returned and is being healed by those who love it, and just as Vieques’ struggle brought global attention to the rights of residents to live without bombardment, so too will Tinian’s voice be heard. The CNMI Constitution’s Declaration of Policy affirms a cultural and natural ethos: *“to preserve and enhance within the Commonwealth the opportunities for cultural fulfillment”* and *“to maintain a healthful, clean and beautiful natural environment”*. Let those words guide the final decision on the CJMT. We ask that the U.S. military not view these protections as obstacles, but as responsibilities it is honor-bound to uphold.

**With serious attention and genuine commitment to the issues raised, it is possible to chart a better path**, one that ensures the defense needs of the many do not sacrifice the rights and welfare of the few. We submit this document in hope that it will compel such serious attention and lead to a CJMT plan that Tinian’s people can regard not with fear or bitterness, but with confidence and trust. Anything less would be a disservice to the people of Tinian, the Commonwealth, and the values we all cherish.

**Sources Cited:**

CNMI BECQ – *TINIAN WATER Quality Monitoring Report (2021)* – evidence of existing WWII debris, UXO, and munitions constituents in Tinian soils; description of Tinian’s lack of sewage infrastructure and unlined dump; documentation of illegal waste dumping by a DoD contractor and resulting contamination (enterococci exceedances).

*CNMI Joint Military Training (CJMT) Revised Draft EIS (June 2025)* – Chapter 4 sections on Groundwater and Hydrology (water demand vs sustainable yield); Groundwater Quality analysis claiming low contamination risk due to soil conditions [14†L121-L129]; Public Health and Safety section on munitions residue management and range clearance protocols [14†L125-L134] .

CNMI BECQ – *Comments on 2015 Draft CJMT EIS* – BECQ’s expert critique highlighting that Tinian’s groundwater is a sole-source aquifer and disputing “less than significant” impact claims; noting lack of baseline data and testing commitments; referencing studies (Denton et al.) on Saipan’s WWII contamination and expecting similar from CJMT; urging consideration of Vieques, Kaho‘olawe, etc., with supporting statistics and quotations.

Historical Case Studies – Vieques: cancer rate and contamination info (Council on Hemispheric Affairs 2011 via BECQ); Kaho‘olawe: extent of incomplete UXO cleanup (Mongabay News 2024); Marshall Islands/Bikini Atoll: description of long-term hazards and exile of residents (Am. J. Public Health 2001).

Regulations and Local Knowledge – CNMI regulatory standards for fuel storage (NMIAC §65-5-210) prohibiting tanks near wetlands/shore; concerns about old DoD fuel tanks on Saipan leaking after decades; community socioeconomic concerns such as effects on dive tourism.

(All citations are to relevant documents and pages as indicated by the bracketed reference numbers. These underscore and substantiate each factual claim made in this response.)

## Comment 70

### Commentor Information

Name	Organization / Affiliation	Comment Format
GERHARD SWORD	KKMP FOUNDATION	website

Legend: N/A = not provided

### Text of Comment

Section 3 of the CJMT RDEIS is fundamentally misleading about what Tinian is today and what the proposed training would do tomorrow. It treats a living homeland like a checklist, minimizing the scale of cultural, health, and environmental harm that would follow.

Culturally, the document reduces sacred and historic places to inventory lines, even while acknowledging an extraordinary density, 344 historic properties within the area of potential effects, including pre-contact Chamorro sites, Japanese-era shrines and farmsteads, and the North Field National Historic Landmark. It also names three Traditional Cultural Properties (Unai Chulu, Unai Dankulo, Puntan Masalok) that sustain identity through communal fishing and teaching but never admits how recurring closures, heavy overflight, and ground disturbance would sever those practices for good.

On noise, Section 3 hides behind averages and jargon. Tinian's baseline is quiet, typical rural and small-town levels around 44–55 Db, but the report downplays single-event peaks the community will actually endure: the RDEIS's own table shows fighter overflights at 2,000 ft reaching about 102–104 dB on the ground, sudden, startling, and harmful with repetition. Calling such intrusions "intermittent" does not make them safe for children, elders, or cultural ceremonies.

On air and water, the text leans on legal attainment rather than lived risk. There is no ambient air monitoring on Tinian; the agency relies on paperwork and permitting while proposing activities that generate dust, diesel emissions, and residue the island's Tradewinds will push toward homes. Worse, Tinian relies on a single public well field (Maui Well No. 2) as its sole potable source; any contaminant that reaches karst soils can move quickly to drinking water—yet Section 3 offers reassurances, not guarantees.

The report even normalizes danger from unexploded ordnance, noting fenced former ranges and ongoing hazard programs, as if generational land loss were an acceptable baseline for more military use.

Finally, it papers over subsistence reality. Interviews cited by DoD itself found about 53% of the average Tinian diet is locally sourced; shutting people out of reefs, forests, and ranchlands is not an abstraction, it is hunger.

Taken together, these omissions and minimizations are not academic errors; they are pathways to irreversible harm to the people of Tinian, to rotating service members exposed to unsafe conditions, and to an island that could be left desolate for future generations.

[Text of comment continues on the following page]

## Public Comment on CJMT RDEIS Section 3: Protecting Tinian’s People, Culture, and Environment

Submitted by GERHARD R. SWORD

September 4, 2025

Thank you for the opportunity to comment on the Commonwealth of the Northern Mariana Islands Joint Military Training (CJMT) Revised Draft Environmental Impact Statement (RDEIS), June 2025. I write to vehemently criticize Section 3 (Existing Environment) for its inaccuracies, omissions, and misleading characterizations regarding cultural resources, noise, air quality, and the standard of living on Tinian. Section 3’s portrayal of these issues downplays the profound and irreversible damage the proposed military activities would inflict on Tinian’s heritage, environment, and people. This comment draws on evidence from the RDEIS (especially Chapter 4’s projected impacts) and established archaeological and cultural data to call for preservation, demilitarization, and respect for community land rights and environmental protections.

### Cultural Resource Destruction and Irreplaceable Heritage

Section 3.5 of the RDEIS catalogs Tinian’s cultural resources in a dry, technical manner, failing to convey their living significance. The document notes that 344 historic properties lie within the area of potential effects, spanning prehistoric Chamorro sites, Spanish colonial remnants, Japanese-era farmsteads and shrines, and World War II battle sites. This includes the entire North Field area – a National Historic Landmark designated in 1985 due to its pivotal role in World War II. Yet nowhere does Section 3 truly acknowledge what these places mean to the people of Tinian. These are not just “properties” on a list – they are sacred landscapes of memory, identity, and grief.

Many sites face destruction or degradation under the proposed action. For example, the RDEIS identifies three Traditional Cultural Properties – the fishing areas of Unai Chulu, Unai Dankulo, and Puntan Masalok – which are critical to Chamorro subsistence and cultural identity. Generations of Tinian families have practiced **traditional net and spear fishing** at these sites, teaching youth the values of *respetu* (respect) and *inafa’maolek* (**harmony and mutual aid**) through communal fishing events. Section 3 makes no mention of how militarization might sever this intergenerational bond. If access is restricted or the tranquility of these coastal areas is shattered by training, those cultural practices and values cannot be passed on – an omission that is alarming in an EIS purporting to describe the “existing environment.” The cultural fabric of Tinian is woven into its land and seascapes, from fishing spots to farm homesteads, and any disruption must be acknowledged as a grave impact.

Even more troubling, Section 3 glosses over sites of immense historical trauma. Tinian’s lands bear witness to wartime tragedies that demand solemn respect, not more violence. The Suicide Cliffs area on the Carolinas Heights plateau, for instance, saw desperate civilians and soldiers take their own lives in 1944 rather than surrender. Oral histories recount these events with pain that still

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resonates today, offering “information and sentiments inaccessible to archaeological inquiry alone”. Yet the RDEIS reduces such locales to sterile entries in an appendix. Nowhere does it mention that these grounds are effectively hallowed by sacrifice or question the propriety of turning them into a modern war training backdrop. This omission is a disservice to history and to the descendants of those who perished.

Another example is Liyang Mohlang, a cave complex used as a refuge by Okinawan and Chamorro civilians during World War II. Archaeologists have documented that Liyang Mohlang sheltered dozens of people and still contains human skeletal remains alongside relics of daily life and conflict<sup>1</sup>. A small concrete shrine with giant clam shells now stands near its entrance, overgrown but testifying to the reverence locals hold for this site of suffering and survival<sup>2</sup>. Section 3 fails to highlight sites like Liyang Mohlang as anything more than “caves” or “archaeological sites.” This is a critical omission: such places are part of the **living cultural heritage** of Tinian’s people. **They are pilgrimage sites, outdoor classrooms, and memorials all in one.** If military training activities damage or deny access to these caves and other historic sites, it would irreparably erase chapters of Tinian’s story that cannot be rewritten. No amount of mitigation or data recovery can truly compensate for the loss of cultural context and spiritual connection once a site is bulldozed or blasted.

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Finally, Section 3’s cursory treatment of cultural resources does not convey the full magnitude of threat posed by the proposed action. The RDEIS mentions legal obligations to protect historic properties and National Historic Landmarks, implying that the military will “minimize harm” to Tinian’s heritage. But this rings hollow. Even “minimized” harm is still harm – often permanent. When limestone forests are cleared or earth is moved, archaeological layers are destroyed forever. Artefacts and human remains, once dislodged from their context, lose much of their meaning. Section 3 provides no honest reckoning with the fact that once a cultural resource is damaged, it cannot be truly restored. The people of Tinian know this well. They have seen how war remnants linger – for example, a former mortar range on the northwest coast (used from 1945 to 1994) remains fenced off as an UXO cleanup site today. This is land that, due to past military use, has been effectively lost to the community for generations. We cannot accept another cycle of destruction. Tinian’s cultural sites from prehistoric latte stone locations to World War II bunkers and civilian shelters must be preserved *in situ* as much as possible, not treated as expendable commodities in a training plan.

#### Noise Pollution – Underestimated Impacts on Health and Sacred Spaces

Section 3.8 attempts to describe Tinian’s existing noise environment, but its characterization is misleading and fails to appreciate how noise from increased training will impact both health and cultural life. The RDEIS notes that Tinian’s ambient soundscape is typical of a small Pacific Island – largely natural quiet, with sounds of wind, waves, and wildlife dominating undeveloped areas. Only near the airport or during occasional exercises at North Field does the island experience “moderately noisy or occasionally loud” human-made sounds. In other words, peace and quiet is

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<sup>1</sup> [uog.eduuog.edu](http://uog.eduuog.edu)

<sup>2</sup> [uog.edu](http://uog.edu)

the norm for Tinian, punctuated only infrequently by military activities. This baseline should be treated as a precious community asset – the serene acoustic environment is integral to Tinian’s rural lifestyle and to the sanctity of its cultural sites. Yet the RDEIS does not emphasize how disruptive the Proposed Action would contrast with this baseline. Describing the island as having “**moderately noisy**” moments downplays just how **jarring and intrusive the planned noise** would actually feel to residents who treasure the current tranquility.

Critically, Section 3’s discussion uses average sound levels and generic descriptors that mask the true impact on human well-being. The document provides typical ambient noise levels (indicating, for instance, ~44 dB in rural fields and ~55 dB in residential areas as day-night averages). However, by focusing on averages, the analysis ignores the real issue: the single-event peaks and the qualitative intrusion of military noise into daily life. Tinian residents won’t experience “average” noise – they will experience sudden fighter jet flyovers, booming explosions, and continuous drone of heavy machinery during exercises. These peak events are severe. According to the RDEIS’s own data, a single F-18 or F-35 fighter operating at 2,000 feet above North Field produces maximum noise levels of about 102–104 decibels on the ground. That is extremely loud – well above the 90 dB level of a heavy truck and nearing the threshold of pain. It is the kind of noise that startles the heart, rattles windows, and can cause physical discomfort and hearing damage with repeated exposure. Even at higher altitudes or smaller aircraft, military planes are in the 80–90+ dB range over Tinian, not to mention the impulsive blasts from any demolitions or gunnery (which carry unique health effects). Section 3 offers none of this context in plain terms. It does not acknowledge that many of these sounds “begin to become uncomfortable above 120 dB” and that even 65–90 dB can be “moderately loud” to “very loud”. Such technical language obscures the lived experience: even occasional military noise at these levels can distress and disturb human beings and wildlife alike.

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The omission of health impacts is especially glaring. Modern research links chronic or frequent loud noise exposure to stress, sleep disturbance, cardiovascular issues, cognitive impairment in children, and other health problems. Tinian’s small community (with many elders and children) would be especially vulnerable to these effects, yet Section 3 reads as if noise were only an issue if it exceeds some regulatory threshold for hearing loss. This is unacceptable. Quiet is a foundation of public health and mental well-being on the island. Islanders are not abstract “receptors” – they are people who will endure anxiety when warplanes roar overhead unexpectedly, and who will lose sleep when nighttime training operations break the stillness (the RDEIS notes a 10 dB penalty is added for night noise in metrics, but it fails to say that Tinian’s people will be jarred awake by these exercises). Cultural and religious practices also require quietude: consider that visiting ancestral graves, saying prayers at a shrine, or holding commemorative events at sites like Suicide Cliffs *all demand a peaceful atmosphere*. Section 3 does not address how sacred moments could be interrupted by the rumble of a low-flying military helicopter or the echo of gunfire. To island residents, such intrusions are not merely “annoyances” – they are experienced as desecration and disrespect.

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Community members have consistently raised noise as a top concern, yet the RDEIS’s existing environment section remains tone-deaf to these warnings. At a public meeting in June 2025, Tinian residents highlighted “noise” among their five greatest worries about the CJMT proposal (along with water, waste, strain on emergency services, and land access)<sup>3</sup>. This aligns with the over 30,000 public comments submitted on the 2015 draft EIS, in which protection of peace and quiet was a recurring theme that forced the military to at least scale back the loudest activities (e.g. removing artillery and bombing from the plan)<sup>4</sup>. Yet even absent those large munitions, the current **proposal’s noise will be far from benign**. Section 3 should have frankly stated: Tinian today is a quiet island with a treasured quality of life for its 2,000 residents and any increase in military noise threatens to fundamentally degrade that quiet, with **broad ripple effects on health, culture, and daily living**. By failing to say this, the RDEIS minimizes a core impact. *In truth, the sound of militarization is itself a form of cultural damage: it drowns out the songs, stories, and solace that define island life.*

### Air Quality Degradation and Aquifer Risks

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Section 3.9 describes Tinian’s air quality as “in attainment” with all national standards, which is accurate but hardly the whole story. Tinian currently enjoys exceptionally clean air because of its remote oceanic location, constant Tradewinds, minimal industry, and sparse population. No air pollutant monitoring stations exist on-island (the CNMI’s environmental agency doesn’t even track Tinian’s air daily, due to the low emissions). In short, the air Islanders breathe is about as pure as it gets in today’s world. The RDEIS acknowledges this baseline but then takes a complacent tone, implying that nothing in the CJMT plans will violate Clean Air Act standards. This legalistic approach misses the real concern: any deterioration of air quality is a direct hit to the community’s health and environment, and certain pollutants of concern don’t have safe thresholds at all (e.g. fine particulates, hazardous air toxins). Section 3 fails to convey how the proposed training – with its construction dust, vehicle convoys on unpaved roads, diesel generators, open burns, and munitions residue – could generate locally significant air pollution even if technically within regulatory limits on an annual average basis.

One major omission is the discussion of particulate matter and dust. Military training invariably kicks up dust: heavy trucks erode dirt roads, cleared vegetation leaves bare soil prone to wind erosion, and ordinance blasts create pulverized debris. The RDEIS does not describe current particulate levels on Tinian (likely very low), nor does it contextualize how sensitive the island’s ecosystem and population are to increases in dust. We remind decision-makers that Tinian has one hospital/clinic and a high rate of respiratory ailments would be devastating in this community. Fine dust (PM<sub>10</sub> and PM<sub>2.5</sub>) can lodge in lungs and trigger asthma, bronchitis, and other issues. Yet Section 3 simply lists the existence of national standards and asserts compliance. **Nowhere does it note, for example, that Tinian’s east-to-west prevailing winds would carry dust and smoke**

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<sup>3</sup> [islapublic.org](http://islapublic.org)

<sup>4</sup> [islapublic.org](http://islapublic.org)

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from training areas in the north directly down toward San Jose village in the south, potentially blanketing the only settlement with haze.

Even more critical is the risk to **TINIAN'S ONLY AQUIFER**, which **Section 3 almost entirely sidesteps**. Tinian's groundwater (*a fragile lens in porous limestone*) is literally the **only source of drinking water** for the island's residents and agriculture. The RDEIS's Chapter 3 does describe basic groundwater conditions elsewhere, but when discussing air quality and soil deposition it **fails to link these to aquifer** vulnerability. This is a glaring oversight: pollutants emitted to air will eventually settle onto the land or water. On a limestone island, anything that settles on the ground – be it particulate fallout from explosions, leaked fuel or chemicals evaporating and re-depositing, or even lead dust from spent ammunition – can infiltrate rapidly to the water table with the next rains. There is no mention in Section 3.9 of the island's designation of a Class I Groundwater Protection Zone, yet the Proposed Action's own description (Chapter 2) notes that **THE TRAINING RANGES WOULD DIRECTLY OVERLIE TINIAN'S CLASS I AQUIFER RECHARGE AREA<sup>5</sup>** (the highest protection category for a sole-source aquifer). This means the very ground that would be trampled, cratered, and potentially contaminated by training is the same ground that catches the rain to feed our wells. Section 3 should have highlighted this precarious linkage in any discussion of air and soil quality. Instead, it gives the false impression that air emissions stay in the air or disperse harmlessly. The truth is, **what goes up will come down, on our farms, into our streams, and through the karst bedrock into our drinking water**.

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The RDEIS attempts to reassure that impacts to groundwater quality will be “less than significant<sup>6</sup>” but we find that conclusion unjustified and dangerously dismissive. What does “less than significant” mean when it's our only aquifer at stake? One spill of a hazardous material, one mistaken release of toxins, could poison water supplies for decades. The existing environment section does note that current military fueling is done with precautions (diesel stored in impervious berms, spill plans in place). While this might sound comforting on paper, in practice it is no guarantee against accidents – especially with a dramatic uptick in activity. Human error, extreme weather, or unforeseen mishaps (such as munitions causing secondary fires or chemical releases) can defeat the best-laid spill prevention measures. Section 3 does not convey the gravity of that risk. It also does not mention that Tinian's karst groundwater has historically been contaminated by past activities – for instance, decades of agricultural chemical use and leftover munitions have left hotspots of concern noted as early as a 1997 Environmental Baseline Survey. If anything, this history proves that once pollutants get into the ground, they linger and they spread beyond the ability of a small island government to remediate. **The RDEIS should have openly stated that any contamination of the sole-source aquifer would be irreversible on a human timescale and catastrophic for the community**. Instead, we get complacency.

In sum, the “Air Quality” section of Chapter 3 falls far short of informing the public about how the Proposed Action endangers the pristine air and pure water that the people of Tinian depend on.

<sup>5</sup> [cnmijointmilitarytrainingeis.com](http://cnmijointmilitarytrainingeis.com)

<sup>6</sup> [cnmijointmilitarytrainingeis.com](http://cnmijointmilitarytrainingeis.com),

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We urge the decision-makers to recognize that *compliance with EPA standards does not equal safety* in a context as unique and vulnerable as Tinian. **The island’s size and single aquifer leave no room for error.** Clean air and water are literally life for us – far more valuable than any training objectives – and they must not be compromised.

### **Deterioration of Quality of Life and Socioeconomic Well-Being**

Perhaps the most heartbreaking deficiency of Section 3 is its failure to articulate what is truly at stake for Tinian’s people: our very way of life and our future on this island. Tinian is not just a tract of land to its residents. It is *home*, heritage, and the only economic base we have ever known. The RDEIS’s Socioeconomics section (3.3) provides statistics – population 2,044 in 2020, high unemployment and over 30% of residents below poverty line – but it offers no human context or sense of urgency about how the military buildup could exacerbate our struggles. The document notes correctly that no military personnel are permanently stationed on Tinian (aside from a rotating Seabees detachment) and that typically 1,000 service members come for a few weeks during major exercises like Valiant Shield. What it fails to conclude from this is that Tinian’s residents are effectively on our own. The forces that conduct training here are temporary visitors – they bring some short-term spending, yes, but they do not settle, they do not pay taxes year-round, and they will not be here to help when negative impacts of training manifest down the road. Section 3 should have noted this fundamental asymmetry: the people bearing the long-term risks (locals) are different from those gaining the short-term benefit (military units). Instead, the RDEIS almost praises the small economic bump from rotating troops (citing how service members rent cars, eat at restaurants, etc.). To portray this transient cash flow as an answer to Tinian’s economic woes is utterly misleading. You cannot buy back a healthy environment or peace of mind with a few months of per-diem dollars.

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In reality, the CJMT proposal threatens to undermine Tinian’s sustainable livelihood and degrade our already fragile standard of living. Section 3 acknowledges that Tinian’s economy is “primarily driven by tourism and commercial agriculture” with subsistence activities playing a vital role. But nowhere does it connect the dots: militarization directly conflicts with both tourism and agriculture, and even with subsistence. Who will visit “America’s World War II Heritage City” (a designation Tinian proudly received) if the island is synonymous with live-fire ranges and jet noise? How can farmers plan crops when large swaths of public land may be periodically closed or impacted by training? Tinian’s people rely on the land and sea for survival to an extraordinary degree – one 2018 survey estimated that *over half* (53%) of the average Tinian resident’s diet comes from locally sourced food (fishing, farming, hunting, foraging). This reflects not only economic necessity but a deep cultural preference for self-reliance and traditional foodways. Section 3’s socioeconomics baseline details the prevalence of subsistence farming and fishing, yet the RDEIS never discusses how increased training could curtail these activities (through restricted access, resource damage, or contamination scares). For a community with limited cash income and high poverty, losing free access to wild foods or arable land isn’t just an inconvenience – it’s a threat to food security. Nowhere does Section 3 state the obvious: If Tinian’s environment is polluted or off-limits, many

residents literally will not eat. This is an unforgivable omission in a document meant to inform decision-making.

Furthermore, the social and cultural cohesion of our community is at stake. The RDEIS makes passing mention of Chamorro and Carolinian cultural values – for instance, it cites the concept of *inafa'maolek* (to make things good, live in harmony) as a core value that nurtures strong community ties on Tinian. Ironically, nothing could be more at odds with *inafa'maolek* than the imposition of militarization that divides families from their land and forces an atmosphere of conflict (even simulated conflict) onto a peaceful island. Likewise, the document notes that Carolinian concept of *tipiyeew* (being of one mind) fosters unity and shared identity. How will our community maintain “one mind” when half of our island is turned into a gated training zone and our people are psychologically torn between serving external military interests and protecting their home? The RDEIS offers no insight into this looming social strain. Many of us have no other home to go to – this is not hyperbole. Unlike military personnel who rotate in from across the United States, **Tinian’s indigenous Chamorro and Carolinian families have deep roots here and *only* here. We cannot uproot ourselves to escape the noise or find another place to practice our culture.** As Section 3 quietly notes, about 91% of Tinian’s indigenous population is Chamorro, and over 74% of residents speak a language other than English at home (Chamorro or Carolinian among them). These statistics imply a community that lives a distinctive Pacific Island lifestyle, not easily transplanted into the Western world. If our lands and waters are spoiled, we face either *displacement* (with likely cultural loss in diaspora) or *diminishment* (staying but suffering in a degraded homeland). Neither is acceptable. **The RDEIS Section 3 should have squarely addressed this existential threat to the people of Tinian.**

Community members have voiced these fears time and again, but the RDEIS does not reflect them. As Florine Hofschneider, a respected Tinian educator, observed at a recent meeting: “The presentation of the CJMT was a little too technical for us... People were not prepared for the social impact.”<sup>7</sup> This statement encapsulates what is wrong with Section 3 – it is all technical data and no heart. The document in its current form fails to prepare or inform the decision-makers about the real human impact: the erosion of a uniquely local way of life that has nowhere else to go. We urge the military and regulators to think beyond numbers and consider the moral responsibility of this decision. The people of Tinian have endured colonialism, war, displacement, and economic hardship. They remain on their island against the odds, cherishing it and hoping to build a future where their children can thrive in the land of their ancestors. **The CJMT threatens to dash that hope by turning Tinian into a sacrifice zone for global military agendas. WE CANNOT ALLOW THAT TO HAPPEN.**

### **Irreversible Damage and Lack of Accountability**

A thread running through all the above issues is the fact that the damage contemplated is effectively irreversible, while those causing it are largely unaccountable to the local community. Section 3

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<sup>7</sup> [islapublic.org](http://islapublic.org)

fails to emphasize this, instead of treating the military presence as if it were just another local land use. It is not. The U.S. Department of Defense is a transient steward on Tinian – it leases roughly two-thirds of the island (the “Military Lease Area”)<sup>8</sup>, but the on-the-ground personnel come and go in rotations. As noted, no unit calls Tinian home; they will not drink the water for decades, or raise families under the noise, or see their cultural landmarks bulldozed. We will. This imbalance in accountability must be clearly understood. When a training exercise leaves behind unexploded ordnance or chemical residues, it is our local authorities and residents who deal with the consequences (often with limited resources). Section 3’s Public Health and Safety discussion does mention ongoing cleanup programs for past munitions and warns the public not to touch UXO, with EOD teams responding when called. But framing this as a normal “existing condition” is misleading. Why are there still fenced-off dangerous areas in Tinian? Because of military activity in years past. The lease has existed since 1983, and in that time the pattern is clear: exercises happen, things get blown up or spilled, and then the community is left waiting (often years or decades) for cleanup and clearance if it ever comes at all. Tinian still has live ordinances from World War 2. Meanwhile, generations grow up unable to use parts of their homeland and fearful of encountering leftover explosives. This is the reality of militarization that Section 3 should be upfront about: once the military scars the land, it is the people of Tinian who live with those scars. The RDEIS should not treat the present lack of catastrophe as if it guarantees the future; rather, it should highlight that increasing the training footprint multiplies the risk of lasting damage that no one can fully undo.

Environmental damage would be permanent on any meaningful timescale. If ancient limestone forests are cleared for firing ranges, it will take centuries for equivalent biodiversity to return – if ever – given the thin soils and invasive species issues. If archaeological sites are excavated and “data recovered” as a form of mitigation, that means the physical site is gone forever; a spreadsheet of artefacts and photographs is a poor substitute for a sacred cave or an ancestral village site in its original form. If a single live-fire munition ricochets or is off-target and starts a wildfire (a known hazard in training areas), it could decimate farmland or wildlife habitat in hours. Should a serious fuel spill or hazardous waste leak occur, it could contaminate groundwater and soil for decades (for example, jet fuel plumes in porous aquifers are notoriously hard to remediate, often persisting for a generation or more). Section 3 does not impress upon the reader that the margin for error is zero – one major accident and Tinian’s livability could be dealt a blow from which it might never recover. The Navy’s assurance in Chapter 4 that groundwater impacts would remain “less than significant”<sup>9</sup> assumes a level of perfection in execution that real-world experience does not support. And who would answer to the people if the “less than significant” turns into a disaster? The CJMT plan, as written, does not provide ironclad accountability. The rotating nature of deployments means that even the best-intentioned commanders cannot guarantee that all units will exercise equal care. A unit training at the end of a long chain of command from off-island might not feel the same sense of custodianship as a resident does. The lack of institutional memory is another

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<sup>8</sup> [cnmjointmilitarytrainingeis.com](http://cnmjointmilitarytrainingeis.com)

<sup>9</sup> [cnmjointmilitarytrainingeis.com](http://cnmjointmilitarytrainingeis.com)

issue: lessons learned by one rotation may not be passed down to the next. This is evidenced by the fact that it took public outcry (30,000 comments) and several years just to convince DoD to eliminate the most obviously dangerous proposals (like artillery on Tinian)<sup>10</sup>. We are still deeply concerned that other hazardous activities remain, and that when mistakes happen, the response may be slow or inadequate. For instance, if a training exercise contaminates our water or if noise causes health issues, will the military provide immediate medical and logistical support? Tinian's Mayor and local government have very limited emergency resources – a concern the community raised about strain on police, fire, and medical services<sup>11</sup>. Section 3 does not address this at all under Public Health and Safety; it reads as though all hazards are hypothetical and manageable. But the community knows that if something goes wrong, we will largely be left to fend for ourselves. The RDEIS should state that plainly, so decision-makers weigh the true costs. Finally, moral and legal accountability must be considered. Tinian's land was leased, not ceded, to the U.S. military. The lease (and subsequent pact with the CNMI) carried promises. Promises to use the land responsibly, to respect CNMI laws and cultural heritage, and to return lands if they were not needed. Increasingly, it feels like these promises are being stretched to the breaking point. The spirit of the Covenant that created the CNMI is that the indigenous people *would not be dispossessed again* of their home. Yet Section 3's portrayal of the "existing environment" treats the Military Lease Area as if it were an unquestioned fixture, rather than a contentious arrangement that consumes 2/3 of our island and already limits our self-sufficiency<sup>12</sup>. If CJMT moves forward, large portions of that leased land may become effectively off-limits permanently (due to constant use or leftover hazards), amounting to a de facto land loss for the community. Who will answer for that in 10 or 20 years? It is easy for an agency to claim, "mitigations will be done" or "monitoring will ensure no problems," but if those prove false, typically no one is held to account – the damage is simply classified as an "unfortunate legacy" and life goes on, except not for those who suffer it. This pattern – seen elsewhere in places like Vieques, Puerto Rico or Kahoolawe, Hawaii – should not be repeated on Tinian. The RDEIS should recognize the overwhelming public sentiment for greater protection and even return of some lands, not further entrenchment of the military footprint. In summary, Section 3 fails to communicate that the CJMT proposal is effectively an irreversible gamble with Tinian's future, being made by parties who won't be around to collect the losses. As a community member, I implore the decision-makers to internalize this: if you allow our cultural sites to be destroyed, our quiet to be shattered, our air and water to be dirtied, and our economy and social fabric to be upended – all in one stroke – you are condemning the people of Tinian to permanent harm with no escape. This cannot be justified by any temporary training need. Retired educator Florine Hofschneider spoke with DoD contractors at a public meeting on the CJMT Revised Draft EIS. Community members like her have expressed that the technical presentation of impacts is hard to digest and that the social and cultural implications for Tinian are

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<sup>10</sup> [islapublic.org](http://islapublic.org)

<sup>11</sup> [islapublic.org](http://islapublic.org)

<sup>12</sup> [cnmijointmilitarytrainingeis.com](http://cnmijointmilitarytrainingeis.com)

not being fully acknowledged<sup>13</sup>. **The voices of the Marianas people must be heard and respected in this process.**

### **Voices of the Community: “Tinian is Our Only Home”**

The flaws in Section 3 are not just analytical – they represent a dismissal of local voices that should be central in this conversation. Throughout the RDEIS process, Tinian residents, leaders, and indigenous organizations have testified to their love of country and fears for the future. These voices are part of the “existing environment” too – the human environment – yet one would scarcely know it from reading Section 3. I will therefore reiterate some of those voices here, to ensure they are on the record for consideration:

**Cultural Heritage and Identity:** As reflected in oral histories and archaeological reports, Tinian’s people have a fierce guardianship over sites like Liyang Mohlang and Suicide Cliffs. One oral history in the Navy’s own Traditional Cultural Properties study recounts the wartime tragedy on the island and notes that such “information and sentiments” give context beyond what archaeology alone can tell. These sentiments include a communal sense of duty to honor those who died on our soil. Destroying or defiling these places with war games is an affront not only to Tinian’s heritage but to basic human decency. Community elders have often said, *“We must never forget what happened here, so it never happens again.”* Turning Tinian into a constant training ground runs directly counter to that plea, it is, in effect, perpetuating the cycle of war on a land that craves peace.

**Noise and Peace of Mind:** Residents, young and old have consistently raised the alarm about noise. During the 2015 Draft EIS hearings, numerous local testimonies cited concern for children’s well-being under increased noise, the impact on wildlife (pigeons, deer, and other animals that locals rely on can be scared away by loud disturbances), and the sanctity of places like church grounds and cemeteries during training. The current RDEIS meetings again saw noise listed as a top five issue by the community<sup>14</sup>. A community member was quoted saying, *“We already hear the jets sometimes, it scares my mother at night.”* These are real fears from real people who do not have the luxury of simply ignoring the noise. For us, maintaining some quiet is about mental health, elder care, and preserving the island’s atmosphere that our culture thrives in.

**Water and Environment:** Water is life on Tinian. Multiple residents, including farmers and water company officials, have submitted comments in the past emphasizing that the island’s water lens is limited and fragile. *“If that gets contaminated, we’re finished,”* was a blunt comment from one public speaker in the earlier CJMT scoping. The RDEIS public meeting summary also noted water resources as the number one concern out of the top five<sup>15</sup>. Our community remembers how in the 1980s the water in one village became brackish due to over-pumping – it taught us that we live

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<sup>13</sup> [islapublic.org](http://islapublic.org)

<sup>14</sup> [islapublic.org](http://islapublic.org)

<sup>15</sup> [islapublic.org](http://islapublic.org)

always on the edge of scarcity. Now, with climate change and recent drought patterns, we worry even more. The prospect of the military drilling new wells and using millions of gallons a year (around 8 million gallons under Alternative 1 by their own estimates<sup>16</sup> raises anxiety: *Will our taps run dry?* Will saltwater seep in? The RDEIS predicts not, but if that prediction is wrong, who will save us? These questions were posed by our community, but Section 3’s rosy baseline of “20 billion gallons recharge per year” but the cnmi joint military training eis buries the fact that distribution and quality, not just quantity, are what we worry about.

**No Alternate Homeland:** Perhaps the most poignant theme in community testimony is that *we have nowhere else*. Unlike stateside communities that might move or have other towns, the people of Tinian (and the CNMI at large) cannot simply relocate their culture and social networks. As one young Chamorro speaker said in 2015, *“We are taught to protect the land because when the land dies, so do we.”* This is an existential point. Many of Tinian’s indigenous families were originally resettled here after World War II – returning from refuge on other islands to rebuild life on Tinian. They did so with the promise that Tinian would be theirs to thrive on. It is heartbreaking that their grandchildren now feel the need to fight the same battle for the right to an intact home. Section 3 might list demographic percentages and languages spoken, but it fails to say that behind those numbers are people who literally cannot survive in the Western mainstream if forced off their land. Our languages, our extended family systems, our traditions of farming, fishing, celebrating village fiestas, all these would wither if we were dispersed. The community has expressed this in countless letters and meetings: *“Tinian is not just real estate; it is who we are.”* Any EIS that ignore that truth is not adequate under NEPA’s mandate to consider impacts on the human environment.

In light of these voices, Section 3 does not meet its obligation to accurately and fully describe the environment that could be affected. The “environment” includes cultural, historical, and social conditions, not just physical resources. By excluding heartfelt community perspectives and reducing them to a bland recital of data, the RDEIS has marginalized the very people whose lives hang in the balance. This public comment is submitted to re-center those people in the narrative. The CJMT is not happening in a vacuum, it is happening to our community, against our persistent objections and pleas for a better path.

### **Conclusion and Call to Action: Preservation Over Militarization**

In conclusion, the CJMT Revised Draft EIS Section 3, as it stands, fails to truthfully represent the stakes for Tinian’s cultural heritage, environmental health, and community well-being. In doing so, decision-makers fail by not giving us the complete picture. When the full picture is brought into focus, as we have tried to do in this comment, **one truth becomes undeniable: the proposed militarization of Tinian is incompatible with the preservation of this island’s only community**

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<sup>16</sup> [cnmijointmilitarytrainingeis.com](http://cnmijointmilitarytrainingeis.com)

**and culture.** The two cannot coexist in the form and intensity envisioned by CJMT. We therefore call for preservation over militarization:

Protect Cultural Resources: Cease plans that would clear or build over our historic and sacred sites. Strengthen, rather than skirt, compliance with the National Historic Preservation Act by actively consulting with local stakeholders on how to leave these sites undisturbed. The best mitigation is avoidance, because once destroyed, our heritage cannot be recreated<sup>17</sup>. Tinian's World War II landmarks have international significance and local sacred value, they should be commemorated and conserved, not exploited for combat training. If the United States honors Tinian as an American WWII Heritage City, it must act consistently with that honor and not subject those very resources to physical harm.

**Respect Our Right to Quiet and Health: Do not assume that training noise can be simply “managed” or ignored. It cannot.** The only way to preserve Tinian's quiet environment – so vital for human health, wildlife, and cultural practices – is to limit the noisy activities in proximity and frequency. This might mean dramatically scaling down training plans, limiting flight operations, forbidding especially disruptive activities at night or during important cultural periods, and maintaining large buffer zones. The RDEIS should be revised to acknowledge the significance of noise impacts and adopt stricter mitigations or alternatives accordingly. Our community's well-being should not be the price of military convenience<sup>18</sup>.

**Safeguard Air, Water, and Land:** The CJMT proposal must not proceed unless it can be guaranteed, not just predicted, but guaranteed, that **our air will remain clean and our sole aquifer protected**. Given the obvious impossibility of such a guarantee (accidents and uncertainty are inevitable), the only ethical path is to avoid high-risk activities entirely. This could mean no use of live munitions that contain perchlorates or other toxins, no open burning/detonation on the island, strict control of fuel handling with independent monitoring, and a comprehensive emergency response plan funded by DoD to handle any contamination immediately. If these conditions cannot be met (and we suspect they cannot, realistically), then those aspects of training should be abandoned. Our Class I Protected aquifer zone should remain just that, *protected*. Likewise, any action that would increase sediment runoff or damage to our reefs and wetlands should be off-limits. Tinian's natural resources are limited and precious; environmental protection should far outweigh any perceived training benefit in the cost-benefit calculus.<sup>19</sup>

**Prioritize Community and Demilitarize Land:** Ultimately, we urge that the U.S. military reconsider its plans in the Marianas entirely. True security for the people of Tinian lies not on a heavily militarized island, but in a healthy, peaceful island that can sustain us. Demilitarization,

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<sup>17</sup> [uog.edu](http://uog.edu)

<sup>18</sup> [islapublic.org](http://islapublic.org)

<sup>19</sup> [cnmijointmilitarytrainingeis.com](http://cnmijointmilitarytrainingeis.com)

scaling back existing activities and returning excess leased land – would do far more to secure our future. The CJMT RDEIS already eliminated Pagan from consideration due to community resistance<sup>20</sup>. It should likewise eliminate the more destructive facets of Tinian training. We call for a solution that invests in Tinian’s people (**education, sustainable development, climate resilience**) rather than in weapons and war exercises that treat us as collateral. Our land rights, guaranteed by the Covenant and our political union with the USA, must be respected. This means our voice carries weight: and our voice, overwhelmingly, is saying *enough*. We do not consent to further destruction of our home.

In closing, I implore the decision-makers, including military officials and federal regulators, to absorb the message behind the data. **Listen to the heart of the Marianas community.** Section 3 of the RDEIS may treat Tinian as a collection of resources to be managed, but to us it is irreplaceable and non-negotiable. We cannot trade our culture, health, and homeland for any promise of “strategic training value.” As public servants, you have a duty under NEPA and under basic moral principles to prevent disproportionate harm to a small, vulnerable community like ours. **The CJMT in its current form poses an existential threat to the people of Tinian, a people who have no other homeland and no greater desire than to live in peace on their island. We therefore demand that you choose preservation over destruction and chart a course that leaves Tinian intact for our children and grandchildren. Our standard of living, our heritage, and our very survival depend on it.**

### **References:**

**CJMT Revised Draft EIS**, June 2025: Section 3 (Existing Environment) and Section 4 (Environmental Consequences), various pages [uog.edu](http://uog.edu) [islapublic.org](http://islapublic.org) [cnmijointmilitarytrainingeis.com](http://cnmijointmilitarytrainingeis.com). These cited excerpts provide supporting data on cultural sites, noise levels, aquifer status, community concerns, and other facts mentioned in this comment.

**Dixon et al.** (2019) and related archaeological studies of Tinian (e.g., Laderan Kastiyu survey) [uog.edu](http://uog.edu), which document the presence of World War II refuge caves (Liyang Mohlang) and tragic historical sites (Suicide Cliffs), underscoring the cultural importance of preserving these areas untouched by new disturbances.

**Public media report**, *KPRG/Isla* (June 25, 2025) [islapublic.org](http://islapublic.org), summarizing community feedback at CJMT meetings – highlighting water, noise, and access as top concerns and quoting local voices about the inadequacy of social impact consideration.

**CNMI historic and cultural preservation records** (e.g., NPS Section 213 Report on North Field NHL), confirming the national significance of Tinian’s North Field and associated WWII sites, as well as the recognition of traditional fishing grounds as cultural properties vital to Chamorro identity.

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<sup>20</sup> [islapublic.org](http://islapublic.org)

**CNMI socioeconomic data from RDEIS and U.S. Census**, illustrating the demographic makeup of Tinian (primarily indigenous, bilingual, subsistence-dependent) and the economic challenges (poverty, limited industries) that amplify the risks of any further strain on community resources. These sources, taken together, paint a clear picture that supports this comment's assertions: Tinian's cultural resources are invaluable, its environment is fragile, its people are vulnerable, and the proposed military activities would inflict harm that cannot be justified or undone. I urge you to heed this information and the community's call to protect Tinian. Please choose a future of respect, preservation, and demilitarization for our island, rather than one of sacrifice and sorrow.

## Comment 71

### Commentor Information

Name	Organization / Affiliation	Comment Format
Liza Atalig	N/A	website

Legend: N/A = not provided

### Text of Comment

As a community member and local to Saipan, I highly oppose the CNMI joint military training draft environmental impact statement. I deeply care for these islands, including the environment and its people. The proposed plans have insufficient community dialogue and engagement, with many community members not being aware of these plans as well as having sufficient information on the plans. The open session held on Saipan did not take into account public dialogue and conversation, instead pushing forward these plans with language of it being in progress rather than subject to review.

71A

There are also significant threats to marine life and wildlife through noise pollution, military testing, and continued build up. These plans limit public access and disregard the needs of our people in favor of military interest.

Additionally, there may be impacts on historical sights that have significant cultural meaning. The CNMI being “strategically positioned” is not a reason to disregard the native communities, continue to take land and access from local residents, and continue to deny the sovereignty of the Chamorro and Carolinian people of the Marianas. As a CNMI resident, my comments are highly against the proposed plans. The draft EIS requires significant review on its harmful impacts and must to be rejected.

## Comment 72

### Commentor Information

Name	Organization / Affiliation	Comment Format
Name Redacted	N/A	website

*Legend: N/A = not provided*

### Text of Comment

The people of the CNMI do not need more military presence in our islands. Increased military presence will NOT benefit our economy and only takes away from the local and indigenous communities that call these islands home. Our strategic military position for the United States only serves the same systems that don't consider us a part of their country and continue to treat residents like second class citizens. We should not be used as a training grounds for a country wherein we do not even hold the right to vote. The use of the island of Tinian or any of our islands for military training is an infringement on the rights of the indigenous Chamorro people to their land and their ancestral home. PLEASE do not move forward with these plans.

## Comment 73

### Commentor Information

Name	Organization / Affiliation	Comment Format
Name Redacted	Guam Legislature	website

*Legend: N/A = not provided*

### Text of Comment

Kindly view attached document. Si Yu'os ma'ase.



**OFFICE OF SENATOR SABINA FLORES PEREZ**

*I Mina'trentai Ocho Na Liheslaturan Guåhan*

38<sup>th</sup> Guam Legislature

September 4, 2025

CJMT Project Manager  
Naval facilities Engineering Systems Command  
Pacific c/o AECOM  
415 Chalan San Antonio Road, Suite 112  
Baltej Pavilion Building  
Tamuning, Guam 96913

Re: Public Comment on the Revised Draft Environmental Impact Statement for Commonwealth of the Northern Mariana Islands Joint Military Training

*Håfa Adai,*

I am submitting this comment in response to the Revised Draft Environmental Impact Statement (EIS) for Commonwealth of the Northern Mariana Islands (CNMI) Joint Military Training. As an elected official from Guåhan, I am concerned with the risks posed by the Proposed Action (PA) to the community, culture, and environment of our sister islands in the CNMI. With the large scope of this PA and the multiple concurrent plans for military expansion within the region, I am concerned about both the negative impacts in Tinian and to the Mariana Islands as a whole.

73A This comment will specifically address proposed conditions under Alternative 1. It should be noted, however, that because there is no significant difference between Alternative 1 and 2, this brings to question whether this EIS actually satisfies NEPA requirements for 'reasonable' alternatives, considering the main difference between Alternative 1 and 2 is tempo in training, despite the environmental impacts being the similar. It is questionable for impacts from construction, live-fire training ranges, and issues related to housing, infrastructure, and solid waste to remain the same when training is expected to decrease with Alternative 2. The two alternatives provide the people of Tinian with little options in terms of what is being proposed. Therefore, in recognition of the potential for harm to the environment and community in Tinian, as well as the lack of reasonable alternatives to the PA, I write in opposition to it and urgently request the Department of Defense (DOD) and U.S. Marine Corps (USMC) to consider the "No Action Alternative," which still leaves significant room for already existing ground, aviation, amphibious, and non-live-fire training in the Military Lease Area as it has for decades.



**OFFICE OF SENATOR SABINA FLORES PEREZ**

*I Mina'trentai Ocho Na Liheslaturan Guåhan*

38<sup>th</sup> Guam Legislature

**Military Expansion in the Pacific Region and the Socioeconomic Costs for Tinian.**

73B According to the EIS, multiple military trainings and projects have occurred within the Marianas since 1999, including the Mariana Islands Range Complex (2010), MITT (2015/2020), the Guam and CNMI Military Relocation (2010 & 2012), U.S. Air Force Divert Activities and Exercises, and the ACE/Agile Reaper 23-1 exercise (2023). Other activities not mentioned in this EIS include the annual Cope North exercises, Guam Flight Test (2024), Resolute Force Pacific 2025 (REFORPAC) exercises, and Valiant Shield exercises every other year, etc. Several of these activities did not require input by the people of the Marianas before occurring, yet all of them create incremental impacts on the environment, natural resources, air quality, and the communities in the CNMI and Guåhan. The overall impact of these activities are not thoroughly assessed by this EIS, creating information gaps in what should be a total and comprehensive impact analysis. Multiple ongoing military projects and trainings in the Marianas region create compounding issues that this EIS does not fully address. Instead, the EIS concludes that the PA will result in mostly either ‘no impact’ or ‘less than significant impact,’ to multiple aspects of life in Tinian. Additionally, there are hardly any mitigation plans in place to address areas where significant impacts are actually identified.

The EIS responds to the issue of restricted fishing and boating (a large part of Tinian’s subsistence lifestyle) by stating that “there would be a modest economic and employment benefit from training, operation and maintenance of the Military Lease Area Range Complex by Range Control, and construction” (ES-7, Abstract and Executive Summary). In Chapter 4, the EIS points to infrastructure improvements that could encourage tourism and provide indirect benefits from the secondary spending from incoming military personnel and construction workers. In comparison to the long-term costs due to tourism loss, threats to local food security, ecosystems, and culture, and potential contamination posed by the military buildup, the expansion’s “cumulative minor to moderate beneficial economic impact” seems negligible.

These claims regarding the potential for economic benefit remain unsubstantiated. The EIS mentions that the USMC is unable to estimate the number of days or specific locations of access controls throughout the year and therefore cannot determine specific economic impacts like potential gain or loss in revenue, job titles/salary, construction costs, and potential economic



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expenditures, etc. In terms of economic benefit, the EIS identifies only 28 people in Tinian that could potentially be employed to Range Control based on past employment/support. No suggestion is made for local hiring or workforce development for the up to 50 construction workers needed over the 10 to 15 year period. The USMC should consider local training and hiring for the 50 proposed construction workers needed, to boost the local economy and to avoid issues related to workforce housing.

73B

Despite pointing to future economic benefits for Tinian and the CNMI, no large economic benefit or revenue gain is actually identified. However, it is made incredibly clear that the PA will have significant impacts on Tinian's subsistence and commercial agriculture, fishing, cattle raising/local meat industry, hunting and foraging of wild game, access to traditional medicine, and public access to WWII and cultural memorials, sacred sites, locations for large traditional events, beaches and the ocean, and other recreational areas necessary for Tinian's primary economic driver: tourism. Overall, the PA poses long-term negative impacts to Tinian's economy that temporary military funds cannot fix or sustain in the long-term.

**Restricted Public Access Effects on Food Security.**

73C

- **Fishing.** The activation of surface danger zones in waters north of Tinian during live-fire training could significantly affect fishing and boating due to restrictions of access to waters approximately 2 to 4 miles from the shoreline. Rather than offer mitigation tactics to ensure ample fishing access, the EIS instead mentions that "local mariners often already avoid these nearshore areas due to natural hazards... Many boats typically navigate at safe distances ranging from 500 feet to over a mile offshore, which often coincides with or exceeds the boundaries of the smallest surface danger zone used." The smallest surface danger zone is about 1.1 miles offshore; this zone is expected to be used 70% of the time during training. The surface danger zone increases to 2.5 miles offshore about 20% of the time and to 3.2 miles approximately 10% of the time. If vessels typically navigate within a 500 ft to 1 mile range to the shore, their access within that range would be restricted 70% of the time. For the other 30% of the time, these vessels would be directed even further out "potentially increasing fuel use, travel time, and exposure to rougher seas" according to the EIS (4-3, 4.1.3.1, Chapter 4). Therefore, the



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PA would greatly disrupt the everyday access of fishing and boating but offers no recourse or remedy for said issue.

- **Subsistence agriculture and cattle raising.** The EIS fails to acknowledge how families in Tinian will support themselves when they cannot access regular food sources.

Temporary access restrictions could affect subsistence agriculture, fishing, and hunting and gathering within the Military Lease Area. These restrictions could range from hours to multiple full days, creating issues for the people of Tinian who rely on foraging,

73D

fishing, hunting and cattle raising within the Military Lease Area. Noise from military activities are also expected to disturb grazing cattle and game within the lease area. Land and sea restrictions, even if only during training activities, will be extremely disruptive to the daily lives of locals in Tinian, and will likely require more money geared towards importing and purchasing food. This poses risks to long-term food security and sustainability.

**Restricted Public Access and Militarism Effects on Tourism.**

An increase in funding due to increased military activity or military construction remains an unsustainable source of revenue, especially as these activities threaten land, water, and other resources pertinent to self-sustainability and stunt other potential areas of economic growth such as tourism and commercial exports, etc. Long term and sustainable economic growth requires intentional planning aimed at improving local markets, increasing commercial exports, investing in infrastructure upgrades, and securing greater tourism capabilities. However, multiple avenues to improve these markets are stunted by military activities.

73E

The increased militarism of Tinian, plus the visibility of servicemen with guns/weapons throughout the Military Lease Area, increased noise levels from live-fire training and jet activity, restricted access to public land and recreational space, and further deforestation may all result in a loss to the tourism industry due to the perceived threat of increasing regional tensions and the ultimate decline in environmental health and cultural vibrancy. The restriction of access to cultural sites and traditional medicine threatens both the CHamoru's indigenous identity and mars Tinian's natural and spiritual beauty, threatening that which is necessary for the tourism market. Additionally, according to Tinian's Mayor Aldan, hotel accommodations remain unavailable to tourists as they have been booked out for two to three years due to military



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construction, making it difficult to get tourists to stay longer than three to four days since all the rooms are taken (Rao, 2025). This leaves Tinian dependent on short-term military activity to sustain their economy. In comparison, a former administrator of the Guam Economic Development Authority pointed to the military buildup as one of Guam's tourism industry's greatest systemic challenges, quoting, "While the relocation of the military from Okinawa to Guam provides short-term economic activity, it does not contribute directly to the recovery of our tourism sector. Instead, it absorbs valuable resources, strains local infrastructure, and perpetuates the perception of Guam as a military outpost rather than the tropical paradise it once was known for... creating an environment Japan, our largest tourist market, does not want" (Martinez, 2024). The PA should accommodate the needs of Tinian in promoting tourism, to ensure long-term economic growth and sustainability.

**Restricted Public Access and the Effects on Cultural Practices.**

73F

- **Traditional medicine.** The EIS does not give a comprehensive overview of the types of *åmot* (plants used in traditional medicine/healing) present in the Military Lease Area, and how the proposed activities may disturb/harm them or disrupt access to them. The revised EIS should provide an itemized list of all of the native and non-native plant species that are important to the practice of traditional healing. The EIS must discuss potential harm or disturbances towards the existence or growth of these critically important medicinal plants. This can be easily done if the USMC coordinates with local traditional healers to identify the presence of *åmot* plants in the proposed area. Doing so will allow greater public input and participation by the CHamoru people— and will provide more comprehensive information about the potential impacts of the PA on environmental justice, medicinal and cultural resources, and even health impacts. If *åmot* is found, even if in sparse amounts, comprehensive planning and action must be taken to protect and conserve these plants. Transplanting may not be a realistic method for *åmot* conservation; therefore, solutions must be realistically considered and discussed with Tinian's local traditional healers.
- **Cultural resources.** Access to historical and cultural lands will be restricted during training activities, potentially affecting recreation by both locals and tourists. The surface danger zone of one live-fire training range overlaps with cultural resources; however, the EIS does not make it clear how impacts to these areas will be mitigated or avoided. The



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suggestions given such as “using small-sized ammunition” does not solve the actual problem of disturbance or harm to irreplaceable and invaluable cultural resources. Within the Mariana Islands, the generational and regional trauma of being denied access to culturally significant land and resources has a lasting impact on the psyche of the CHamoru people. Furthermore, concerns regarding the repatriation of potentially found cultural artifacts is not discussed within the EIS. The USMC must ensure that plans are in place for the full disclosure of any historic and cultural artifact found within the area of the Proposed Action to the public and to ensure **preservation in place** of cultural artifacts and historical sites. There should be no failure on the part of the USMC to preserve in place and prevent further harms to CHamoru cultural heritage. In any other nation, this unnatural disruption of everyday life and tradition would be highly opposed and criticized. Access to cultural resources and traditional medicine should be provided to the public, with little interference. The preservation of cultural lands and resources should be prioritized.

**Strain on Infrastructure.**

The addition of up to 1,000 service members will result in a population increase of almost 50% of Tinian’s existing population of 2,044 people (2020 census). This increase will place a strain on various infrastructure and resources like water, wastewater collection, solid waste management, housing, and wildfire control, etc. The EIS only lightly addresses these areas of concern:

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- **Water Resources.** The addition of new water infrastructure to support the Base Camp will not be connected to the Commonwealth Utilities Corporation water system and will consist of up to 4 new or rehabilitated groundwater wells, with a demand of up to 7,971,440 gallons of water per year. I am concerned of potential impacts to the groundwater resource in its entirety, the need for construction of monitoring wells to monitor levels of chloride concentration that is indicative of salt water intrusion, if not checked can result in irreparable harm to the drinking water of Tinian. Furthermore, monitoring wells are needed to test all regulated, emerging, and candidate contaminants, as determined by the local people. The local people should be compensated for the use of the water that is pumped from the new or rehabilitated wells. Testing results must be readily available to all residents of Tinian in a timely manner. Groundwater is necessary



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to sustain life for the local population. The public owns the rights to said water for public use, drinking water, recreation, and other uses. Any infrastructure upgrades must benefit the residents of Tinian. Furthermore, a Stormwater Pollution Prevention Plan must be developed, updated, and/or adopted prior to the National Pollutant Discharge Elimination System Construction General Permit application. Information within the EIS should not be based on an assumption, because clean up and remediation of groundwater and surface water impacted by construction activities, live-fire training, fuel storage, and subsequent runoff, sediment pollution, and toxic contamination can be costly and put the health of the community and environment at risk of harm that could be avoided.

73H

- **Wastewater.** The addition of new septic tanks, leach fields, and sanitary sewer collection pipelines are planned to be installed to meet the demand of 53,000 gallons of wastewater per day. **Septic tanks with leaching fields must be prohibited. Only sewer collections should be allowed.** This part of the EIS does not provide the scope/size, type, or any details of the proposed septic system or leaching field and does not provide information on how this septic system may be detrimental to the surrounding environment. Septic systems can lead to an increase in groundwater contamination because they do not properly filter contaminants such as nitrates, PFAS, and phosphorus that are derived from wastewater. Septic systems often leach these contaminants, along with any chemical added to the system, directly into the soil. Plus, disposal of toxic septic sludge will be disposed of in an area that has not yet been identified or approved by the CNMI. Septic systems can adversely impact Tinian's groundwater and impose financial burdens on the local government for future treatment costs to manage contamination and reduced groundwater quality. In Chapter 3, the EIS mentions the Commonwealth Utilities Corporation's feasibility study for a new wastewater treatment system. I urge the USMC to invest in the implementation of a central wastewater collection system before conducting the PA, in order to prevent avoidable harm and contamination to Tinian's groundwater. Assisting Tinian in constructing such a system will ultimately save the USMC from having to spend money and time on septic system maintenance, replacement, and eventual environmental remediation.

73I

- **Solid Waste.** DOD policy on minimum solid waste diversion from the landfill and incineration mandates 40% diversion of non-hazardous solid waste. The USMC is only



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capable of diverting 12% (67 tons) of its estimated 562 annual tons of generated waste. The EIS states that “all potential disposal locations have sufficient capacity to accept the waste generated by Alternative 1” (4-125, Chapter 4). This is inherently false according to USMC’s own information. The facts are: the DOD should aim to meet their minimum solid waste diversion requirement. It cannot do so because the current recycling infrastructure in Tinian does not have the capacity to handle USMC recyclables. The existing landfill also has limited capacity to handle USMC waste, placing the onus on Tinian to improve its infrastructure and to find a location and fund plans for a new landfill (that could take 5 to 8 years to complete). Therefore, rather than having ‘a less than significant impact’ on solid waste utilities, its activities place too much strain on local infrastructure that is exacerbated by the deviation from its own diversion policy. Because of the limited land area, the USMC must exceed the 40% minimum solid waste diversion policy. If they are unable to do so under the current circumstances, then they must invest funding into Tinian’s recycling infrastructure or pay to ship recyclables off the island to reputable recycling centers elsewhere. It is unconscionable for the USMC to lower DoD standards for recycling *and* to not improve Tinian’s solid waste utility to handle a dramatic increase in solid waste by their increased activity and presence.

73J

- **Housing.** The EIS identifies around 70 off-island workers that will live in Tinian during the extent of the PA’s activities. Additional housing in Tinian will be needed to accommodate these incoming workers. Although this number isn’t significantly large, the mayor of Tinian has noted that ‘since the U.S. DOD began its construction activities on-island, many contractors and subcontractors have been acquiring properties for housing their workers, and for warehouses or stockyards for their construction equipment’ (Erediano, 2024). Tinian is less than 40 square miles and two-thirds of the island is leased to the U.S. military. This leaves a limited amount of space capable of use for housing the local population. Meanwhile, the steadily increasing population and military build-up has correlated with an increase in the cost of housing and rent. Mayor Aldan stated that before 2018, a two-bedroom home would cost around \$80,000. Today, a one-bedroom can cost as much as \$180,000. This is more than double the cost in just 7 years due to increasing demand with limited supply, creating housing conditions that are costly for most locals whose minimum wage is \$7.25 (Rao, 2025). In 2024, property owners were



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charging around \$600-700 in monthly rent for one-bedroom houses (Erediano, 2024). The EIS also discusses the population increase's foreseeable impacts on public services, such as, medical care, which "may not be able to manage additional demand adequately during periods of simultaneous project construction" (4-152, Chapter 4, EIS). The EIS views this, as well as impacts on law enforcement and firefighting services, as minor—even though these additional demands will affect the accessibility to these services by residents, businesses, and tourists alike.

Overall, the EIS was released with little to no long-term plans for solid waste management, surface water protection, wastewater treatment/sewage management, wildfire prevention, and housing. There are references made to potential plans, including the Draft Comprehensive Integrated Solid Waste Management Plan, the CUC's feasibility study for a new wastewater treatment system, and a not-yet-developed Wildland Fire Management Plan, but none of these plans are fully realized. There appears to be a lot of unknown variables involved with the implementation of the PA, considering the lack of comprehensive information and plans. Without the completion of these studies and plans, the EIS remains incomplete and premature. Furthermore, a Tinian resident has claimed that:

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The U.S. military presence has brought in a significant amount of federal funding, but little of it goes to community development. The people of Tinian are seeing approximately, a total of \$1 billion dollars in [Department of Defense] contracts for construction projects... We have seen virtually nothing in the way of federal funding to support, help develop the island of Tinian for the people of Tinian.

That is causing some friction (Rao, 2025).

More effort should be aimed towards providing the people of Tinian with the infrastructure necessary to support the influx of military personnel, DOD civilians, and construction workers. With nearly \$800 million dollars being invested into military expansion in Tinian, funds must be earmarked and made available to ensure that the community receives ample benefit as well.

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**Hypermilitarization, Climate Change, and Their Lasting Impacts on Ecological and Cultural Resources.**



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The PA poses multiple environmental and social justice issues. The DOD's failure to address their contributions to climate change will only further exacerbate the threats that Pacific Islands face in the wake of a warming world. Construction, deforestation, disposal of waste, the installation of diesel generators, and the increased use of fuel will all cumulatively contribute to Tinian's air quality and the impacts to climate change that will ultimately exacerbate Tinian's infrastructure issues, environment, and health disparities.

**73K**

- **Air Quality.** The EIS attempts to justify the generation of hundreds of thousands in metric tons of greenhouse gases by stating that the PA will only contribute a small percentage of emissions on a global scale. Ambient air quality standards are applicable to the local area; comprehensive data and impact of potentially hundreds of tons of hazardous air pollutants must be determined for Tinian's community and environment. Without procuring an accurate assessment of the existing air quality, we cannot assess an accurate representation of how the PA will affect Tinian's environment.

- **Water Resources.** The EIS fails to address the full impacts from military activities on Tinian's groundwater. Overextraction of island aquifers can lead to salt water intrusion and can irreparably harm the water source that has sustained the community. Furthermore, pertaining to groundwater contamination, the EIS does not point out where Tinian's aquifer is in relation to certain USMC activities, such as the two live-fire training ranges. It can be reasonably inferred that contaminants from live-fire training, uncollected firearm rounds, and explosives will eventually impact Tinian's aquifer, even if these activities are a distance away. Deadly contaminants such as lead and PFAS are typically found in military munitions and explosives. As munitions are detonated, lead and PFAS are released into the surrounding environment and deposited into the soil, groundwater, and surface water; porous limestone is especially subject to absorbing these contaminants from soil and runoff. PFAS is a threat to groundwater and human health; they are long-lasting and bioaccumulate in people's bodies—leading to high rates of cancer, chronic illnesses, birth defects, and death, etc. Lead poses significant health risks to the nervous system, liver, and bones; and can result in brain damage, stunted development in children, pregnancy issues, death, etc. (World Health Organization, 2024). Fuel tanks and pipelines also pose a contamination risk to Tinian's aquifer and groundwater, especially as leaks can go undetected for long periods of time. All of these

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contaminants are difficult to remediate in the environment and groundwater, leaving Tinian incredibly vulnerable to negative health impacts and potential economic strains (if water has to be imported). Overall, any threat of contamination to Tinian's aquifer poses extreme health risks to the locals and threatens their access to clean drinking water.

- **Biological Resources.** The EIS proposes to violate the Endangered Species Act by not identifying critical habitat for the newly listed Mariana Island endangered and threatened species and by further threatening native ecosystems through proposed deforestation, live-fire training (contamination), training events (noise), and the resultant spread of invasive species and the increased risk of wildfires. The EIS mentions that the USMC "would coordinate with CNMI and federal agencies on pre-planning actions associated with biosecurity" and "as part of the USMC's Conservation Program, a Wildland Fire Management Plan would be developed." These plans should have been developed for the purpose of the EIS, to provide the community with information on USMC's potential mitigation tactics. It is premature to assume that these plans will be effective, and it is unfair that the community is expected to accept the results of this EIS with important plans like these not included. Nesting bird surveys have also not yet been provided.

73M

The EIS fails to provide enough information regarding the 19 acres (2%) of Tinian's Natural Resources Conservation Area, meant for conservation of the endemic and endangered Tinian Monarch, that is planned to be cleared for construction of landing zones and access roads. It is extremely concerning that specific mitigation measures are not already planned for or mentioned. Conservation areas are extremely important as they are vulnerable. They already face multiple stressors: invasive species, natural disasters, an increasingly hotter climate, etc. Conservation areas cannot be replaced; the successful translocation and transplanting of native flora and fauna is unlikely unless new sites mimic exact conditions of original habitats. It is highly suggested that USMC move the construction of landing zones to another location, particularly, a non-conservation & previously disturbed area. With no scientific basis provided, it is inappropriate, if not absurd, that the EIS mentioned that native vegetation could act as a natural buffer to projectiles (from the Multi-Purpose Maneuver Range) entering coastal waters. Although it is assumed that projectiles are unlikely to enter the sea, it is not a better alternative for projectiles to hit vegetation. There remains concern over how contaminants from

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projectiles and potential unexploded ordnance could impact the environment surrounding these live-fire training ranges.

I am also concerned about the posed risks to the native fanihi (Mariana fruit bat) and green turtles. The PA will result in the loss of potential roosting and foraging locations for the fanihi through deforestation and increased noise; however, no specific plans for mitigation or forest restoration are provided by this EIS. The fanihi are a highly threatened species in the Marianas, with no indication of great recovery in the past decades. They have a slow birth rate of one pup per year and a lifespan in the wild of only 5 to 8 years (Brooke, Guampedia). The PA also poses direct harm to green turtle eggs and nesting activities during training, increasing concerns over the protection of sensitive marine species. Overall, the cumulative impacts of the PA will continue to disturb the environment/ecosystems and native species, with even considerably small impacts having effects on such sensitive species. Plus, the survival of the fanihi is necessary for the germination and dispersal of native fruit, plants, and trees; therefore, the survival of Tinian's ecosystems are predicated on the conservation of this species. In consideration of the sensitive nature of these ecosystems, there is no such thing as a negligible impact. Therefore, increased military activity, live-fire training ranges/projectiles, noise, explosives, contamination, and others are disruptive and unfavorable to creating an environment in which these listed species can recover and thrive in the future.

73M

- **Hazardous Waste Management.** The EIS mentions operational-related hazardous wastes (e.g. fluorescent lamps, mercury-containing instruments, batteries), but does not provide an estimated quantity of hazardous waste expected to be generated. All hazardous waste related to operations and construction are planned to be transported off-island or stored in accordance with RCRA regulations. However, the EIS fails to mention other types of hazardous waste expected to be generated by military-related activities including live-fire training (e.g. projectiles) and explosives testing and how these types of wastes will be handled and disposed of. It also fails to identify the area in which a Hazardous Materials Storage building will be constructed/located. The people of Tinian have the right to know the types of all hazardous materials expected to be imported and generated, the sources of said hazardous materials, the estimated amounts meant to be

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stored or disposed of, and where such materials will be stored on their island. A more comprehensive overview of hazardous waste management must be provided. And, emergency plans must be designed and implemented, with public participation, to address potential hazardous spills, leaks, and accidents— in order to ensure that proper mitigation tactics and remediation plans are properly in place before implementation of the PA.

73P

The PA's goal to further advance the USMC's interests within the Mariana Islands comes at a great cost to Tinian. This broad reach of military power poses harm to the local population and ecosystems in Tinian, and to the larger Pacific region, especially in terms of producing greenhouse gas emissions and hazardous waste generation that exacerbate climate change and sea-level rise. Cumulative impacts from large-scale military activities create compounding issues that are likely to leave unreasonably large and lasting health impacts in Tinian.

73A

**It is unclear how the determination of 'No Impact' or 'Less Than Significant Impact' was made in addition to an inadequate assessment of cumulative impacts on the community and environment in Tinian and the broader Marianas.** Hundreds of millions of dollars are projected to be spent for this Proposed Action, with little justification for training in Tinian in the first place. Tinian in itself does not have environmental conditions or terrain that offer new experiences or learning opportunities for military training.

73P

It is an environmental justice issue due to scale, intensity, and frequency of unchecked militarization and the subsequent large and cumulative environmental impacts in Tinian and the Mariana Islands because of the political power imbalance between the CNMI and the US, unlike that which exists with sovereign nations. Meanwhile, these activities may increase geopolitical tensions within the region by projecting force near U.S. 'adversaries,' leaving the Mariana Islands vulnerable and targeted.

All negative impacts mentioned in the PA cause and increase trauma and negative health outcomes for both the local population and native ecosystems over time, and typically manifest in the form of higher healthcare costs, lower life expectancy, hearing problems, land degradation, a decline in food security, loss in indigenous flora and fauna, and irreparable harm to drinking water, amongst a multitude of impacts. What types of compensation can be provided to the people of Tinian if mitigation measures or restoration methods fall short of the promise to protect and conserve the island's critically important land, species, or environmental and cultural



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73P resources? Overall, there seems to be no sound scientific basis that supports the determination of 'no impact' or 'less than significant impact.'

73A Throughout the entirety of the EIS, impacts on different aspects of Tinian are described, yet the EIS contradicts itself when actions are then deemed not impactful. These conclusions remain questionable, because of the inherent conflict of interest between the desires of USMC for military expansion on one of smallest land masses with a high biodiversity richness and the presence of endemic endangered and threatened species. In addition to sound scientific basis, genuine consultation must be implemented with the indigenous people and residents of Tinian population, who have a direct stake in cultural resources, access to public space, subsistence cattle ranching, fishing, tourism, and other resources.

73P The EIS fails to provide a thoroughly comprehensive and detailed overview of the environmental and cumulative impacts caused by climate change and the multitude of military projects throughout the Mariana Islands, including tangible research and data about Tinian's cultural resources (e.g. traditional medicine, artifacts), economy/tourism, environmental quality, ambient air quality, and future infrastructure plans. Overall, this large-scale proposed action is incongruent to Tinian's land mass, local needs, and biodiversity and resource conservation, and therefore undermines the pursuit for environmental justice in Tinian and the entire Mariana Islands. To conclude, I write in opposition to the PA and urgently request the Department of Defense (DOD) and U.S. Marine Corps (USMC) to consider the "No Action Alternative."

*Senseramente,*

Sabina Flores Perez

Senator, *I Mina'trentai Ocho Na Liheslaturan Guåhan*



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## Comment 74

### Commentor Information

Name	Organization / Affiliation	Comment Format
Grace Choi	Community Member	website

Legend: N/A = not provided

### Text of Comment

My name is Grace Choi and I am writing this comment as a concerned community member. Please consider my comment as I come from a place of love for my home and my islands.

#### 2.1.5.2 Explosives Training Range, Page 2-16

74A

This section of the EIS mentions the minimization of potential noise impacts to the Mariana fruit bat and the potential impacts to culturally sensitive areas. The DEIS fails to assess the realistic impacts of what explosive training would mean to the island's wildlife and environment. I am writing this comment as somebody who works in the environmental sector in the Mariânas. I have worked under the Division of Fish & Wildlife where I learned that the Mariana fruit bats are highly endangered and highly sensitive to their environments.

The persistent explosive trainings would not only disturb the peace and stability of the Mariana fruit bats but other wildlife as well. In such small islands like in the Mariânas, ensuring the survival of these endemic species is crucial to maintain the biodiversity of our islands.

This EIS fails to assess the Mariânas as a whole and does not consider the human impacts these explosive trainings would have. The persistent explosives in such a tiny island would instill fear and anxiousness instead of feeling safe or secure in any way shape or form. Not only would this impact the children and elderly, it would also affect the veterans with PTSD.

The island of Tinian has already faced major desecration from World War 2 and the current militarization of the island continues to be a barrier for genuine recovery of the past bombings. The small island has gone through enough disturbances, both the community and the wildlife.

74B

Lastly, these explosive trainings would most definitely affect the marine life. Our community is dependent on the ocean and it is a part of our lifestyle. Having Tinian be a live fire range would not only impact Tinian but Saipan as well. These concerns are not specified in the EIS and is not considered enough for what these "developments" would mean for our community.

74C

All in all, I believe that this EIS does not sufficiently cover and assess the true damages this would inflict on the Mariânas. The community demands more transparency, clarity, and accountability to genuinely minimizing harm to the people and the ecosystems of the Mariânas. We urge the Department of Defense to consider the voices of the people who live here who have long expressed concerns about the scale, scope, and culumative impacts of ongoing military build up in our islands. We encourage public engagement and transparent information sharing in this and related proposals and activities. We also recommend that the Department of Defense consider selecting the "no-action" alternative for this proposal as a responsible path forward, consistent with the stewardship values the military and our islands strive to uphold.

From a concerned community member, Grace Choi

## Comment 75

### Commentor Information

Name	Organization / Affiliation	Comment Format
Toni Brooks	N/A	website

Legend: N/A = not provided

### Text of Comment

Håfa Adai, My name is Toni Brooks and I live in Barigåda, Guam.

I am the daughter of a USAF retiree originally from Alabama and a retired school teacher who is indigenous to Guam. I joined the military after September 11, 2001, believing I had to do my part in the “war on terrorism.” It was during my ten years as a military member, federal civilian employee, and then military contractor that I learned more about the machine that is the US military. It was during my deployment to Iraq that I formed my opinions on pointless forever wars and started my research on the military industrial complex.

Attached are my comments on the 2025 Revised Draft Environmental Impact Statement for the CNMI Joint Military Training (CJMT). In my comments, I echo the formal comments of Our Commonwealth 670, especially specific concerns regarding:

The insufficient analysis of cultural and historical site impacts

Threats to endangered species and ecologically sensitive areas

The lack of meaningful community engagement and consultation

The need for alternatives that do not compromise public access or environmental health

First and foremost, I challenge all findings of “No significant impact.”

Military buildup in the Pacific has had and will continue to have substantial cultural, environmental, socio-economic, and geo-political impact on the people, plants, and animals of the Mariana Islands, including Indigenous CHamoru and Carolinians. Therefore, any finding of “no significant impact” is factually incorrect.

75A

Most recently, unexploded ordinances from WWII were found in Saipan. This EIS fails to address the mess left from previous wars and exercises and fails to provide detailed plans for the clean up of unexploded ordinances and plutants by previous military activities in the CNMI.  
<https://www.rnz.co.nz/international/pacific-news/570403/unexploded-wwii-ordnance-unearthed-at-american-memorial-park-in-saipan>

75B

Further, this EIS fails to address cumulative impacts of multiple efforts to increase military activity in the Mariana Islands archipelago. By attempting to obscure the cumulative impact you are ignoring the scientific fact that the Mariana Islands archipelago is a biological, economical, and social region and, thusly, what happens on one island in the archipelago affects another. This EIS must include cumulative impacts of all current and planned EIS processes in the region and include existing residual impacts from previous military activities in the region.

My time in the military taught me that war is not inevitable and that unending wars only serve government contractors. To wit, I had a joke on the flight line: “What happens when country A and country B go to war?” It doesn’t matter who country A or country B is. The winners are always Lockheed Martin, General Dynamics, Northrop Grumman, and the list goes on. I oppose setting up our islands to once again be the stomping grounds for a conflict between imperial powers. In this day and age, with our technology, knowledge, and financial power, peace is possible. Anything other than peace is a policy choice to continue lining the pockets of government contractors.

I demand that local, national, and international leadership on all sides prioritize peace, diplomacy, decontamination, and disarmament in order to prevent another war.

The only alternative that is acceptable is a no-action alternative where our islands can be spared from the harmful impacts of this proposed action.

Toni Brooks

USAF Veteran, OIF

## Comment 76

### Commentor Information

Name	Organization / Affiliation	Comment Format
Fletcher Moore	N/A	website

Legend: N/A = not provided

### Text of Comment

Overall community impact:

Tinian is a very small island with limited resources which have been carefully crafted over the last 80 years of peace. The people of Tinian were left with a desolate island after world war 2 and have been able to create a thriving and peaceful community. Actions 1 and 2, alongside the other ongoing and proposed military buildup on the island, directly jeopardize this peace and progress. Under current conditions large groups of military members are seen all around Tinian. They often visit the pristine beaches of Tinian and use the valuable public resources. Taga beach for example only has 3 covered tables. On any day it is likely you will see all these tables used by military allowing no space for the locals who built the facilities and care for the space. This is a small example of the way the massive US military will overwhelm and sweep away a small community that has built itself an existence after 350 years of war and genocide. Even just a few dozen military members have an outsized impact on this island, and the hundreds who will come with this plan will entirely overwhelm the community.

Everyone knows the problems marines have caused in other base locations like Okinawa. How can the military prevent rape and murder occurring at the hands of their employees on Tinian? This is not something I see discussed at the town halls or in this document. One innocent victim on Tinian is too many to justify this training facility.

Dump site:

76A

The proposal suggests that the military will fund a new dump site for trash created by training. This site is much further north than the existing dump. Representatives at the meeting on Tinian suggested that this new EPA compliant facility could be used for municipal trash as well. Many people on Tinian do not have vehicles good enough to travel that poor road. Without trash pickup or a transfer station, a further away dump will likely lead to more illegal dumping, pollution, and environmental degradation. I suggest that the recycling facility and transfer station be made fully operational and staffed through this project. This would allow for the small island to manage it's waste alongside the much larger military impact.

Northpoint firing range:

76B

The current proposal suggests that live fire training will occur occasionally and when it is scheduled boaters will be notified via a QR code or email notifications. Many people in the CNMI do not use smart phones or email. Travel from Tinian to Saipan is not necessarily planned ahead of time and instead is taken as needed. The vast majority of all goods on Tinian come from Saipan directly through the exclusion zone from the firing range. Closing that area for any amount of time will be incredibly difficult to communicate or enforce and will have a massive impact on the economy and connectivity of the islands.

76C

Environmental Impacts:

The natural resources of Tinian have already been immensely impacted by military action from Japan and the US. In the 80 years since WW2 there has been a large amount of natural regeneration of forests across the island. Every native tree provides habitat for wildlife, ecosystem services, erosion control, and food and medicine for people. This document recognizes the value of current “native limestone forest” but ignores the fact that the whole island used to be this same valuable habitat and likely will be again in the following decades without further human caused destruction. When selecting for development sites like the LZs, care should be taken to disturb the least forest possible. This includes “tangantangan” forests which always contain diverse native tree seedlings and are often on their way to becoming more productive forest ecosystems. These low forests are also important habitat for the Tinian Monarch. Development should only occur in open areas or grasslands where there are no native trees present. If any trees are removed they should be replace via mitigation measures, including “tangantangan forest” areas.

Conclusion:

Overall, I strongly disagree with this proposed action. Tinian is a small island with a tragic history of war and loss. Since the Spanish first arrived around 400 hundred years ago this island has not known peace. Now it finally has a chance to forge its own path and that is being ripped away for training purposes. This facility is not essential for national defense; it does not make the people of Tinian safer. It makes them more likely to be hurt or killed by American service members, more likely to be a target of foreign adversaries, more likely to have their home spoiled by invasive species, and more likely to have their culture and identity diluted and destroyed. Leave these good people alone.

## Comment 77

### Commentor Information

Name	Organization / Affiliation	Comment Format
Prutehi Guáhan	Prutehi Guáhan	website

*Legend: N/A = not provided*

### Text of Comment

Please see the attached document for comments.



**Prutehi Guåhan**

(Formerly Prutehi Litekyan - Save Ritdian)

[prutehigu@gmail.com](mailto:prutehigu@gmail.com)

Sept. 4, 2025

VIA COMMENT PORTAL

<https://www.cnmijointmilitarytrainingeis.com/comment.html>

TO: CJMT Project Manager  
Naval facilities Engineering Systems Command  
Pacific % AECOM  
415 Chalan San Antonio Road, Suite 112  
Baltej Pavilion Building  
Tamuning, Guam 96913

**Re: CNMI Joint Military Training Revised Draft Environmental Impact Statement Public Comments Submitted by Prutehi Guåhan**

Hafa Adai:

On behalf of Prutehi Guåhan (Prutehi), we submit the following comments on the **CNMI Joint Military Training Revised Draft Environmental Impact Statement**. Our organization vehemently opposes this proposed action and the many adverse impacts it will have on the environments and communities in Tinian, Saipan, Luta, as well as Guam and throughout the Marianas archipelago. We support the **No Action Alternative**. We challenge all findings of “less than significant impact” and “no significant impact” request that a supplemental or new Environmental Impact Assessment is completed before any action occurs. The CJMT Draft EIS does not discuss potential environmental, cultural, social, infrastructure, or economic impacts to the CNMI. Concerns for safe housing, healthcare and services access, contamination of the sole-source aquifer, cultural resources, increased gendered violence, endangered species loss, etc. should be considered and analyzed as part of a cumulative impact. The Draft EIS does not adequately justify the determination for less than significant impacts or no significant impacts in any areas. Any such determination reflects cultural insensitivity and disconnection that is intrinsic to the peoples of the Marianas. With the No Action Alternative, no harmful impacts would be expected to occur.

We must also consider this proposal against a long-established history of colonial violence, environmental racism, and numerous and enduring ecological destruction and violations of our human and Indigenous rights, including but not limited to loss of access to coastal areas, the destruction of native and endangered species, numerous cases of substantial contamination, and severe and permanent desecration of sacred sites.

Established in 2017, Prutehi Guåhan, formerly Prutehi Litekyan is a community-based organization dedicated to protecting and preserving the natural and cultural resources of Guam. This includes the areas proposed to be used for relocating U.S. Marine Corps forces currently located in

Okinawa, Japan to Guam, and for military live-fire training. Our members and network comprise of members of the Indigenous CHamoru community and other residents of Guam, allies, and concerned citizens with the interest of protecting the beliefs, the culture, the language, the air, the water, and the land of the CHamoru. More specifically, our supporters comprise of traditional healers, fishermen, businesspeople, college students, farmers, teachers, social workers, cultural practitioners, displaced landowners of occupied lands, and environmentalists. We represent these individuals, in addition to over 25,000 petition signatories, by actively engaging in the comment processes and have consistently demonstrated a special interest in the areas of controversy. Since its inception, our group has organized more than 600 different outreach and educational events, letter-writing campaigns, school visits, comment drives, demonstrations, tours, press conferences, and more.

Accordingly, PRUTEHI and its members have a direct interest in ensuring that federal actions and decisions do not harm or have a potential to harm the environment and the cultural resources and historical properties of the Indigenous CHamoru people. These interests extend to environmental resources that could constitute as a historic and cultural property, including land, sources of water, and water bodies. DoD's environmental review in connection with actions and decisions that inadequately consider the effect of their undertaking on cultural resources would impair Prutehi's interests. Thus, our organization has a significant interest in ensuring that (1) Tinian's sole-source aquifer, air, and lands are protected for all future generations; (2) DoD fulfills its mandates under applicable federal laws and regulations to prevent the destruction or loss of cultural resources and historic properties; and (3) our community members have public access to information and appropriate supporting documentation regarding DoD's identification and evaluation efforts and findings, to provide the public opportunities to comment.

Deficient assessment of impacts, lack of public information available for community responses, and failure to ensure Free, Prior, and Informed Consent within the comment period are just some of the concerns we mention in this comment submission. The appendices for the Draft EIS were not made available upon the opening of the comment period. Additionally, the organization and identifying title of each chapter were missing making this document difficult to navigate. Also lacking is a thorough analysis of alternatives including other locations for the action and alternatives for infrastructure construction materials. The EIS does not offer substantial analysis of how the determinations were made. The lack of public access to the areas of impact also prevents a true understanding of the changes and risks to the landscape, both physical and cultural. We are particularly concerned about the potential contamination of the sole-source aquifer in Tinian. We do not have to look far to see how human activities have permanently destroyed fresh water resources such as in Saipan and several abandoned wells in Guam. There is also the issue of unresolved existing munitions left in Tinian.

77A

The timing of the process is also problematic given that the comment period began before all information was made available to the public. This comment period also ran simultaneously with another comment period open for the Marianas Islands Testing and Training activities on No'os.

Several citizens of the CNMI also reside in Guam and no public outreach took place in Guam, severely underserving the collective community of the Marianas. This lack of thorough community engagement is also a breach of our right to free, prior, and informed consent, which is a violation of our human and Indigenous rights

77A

<https://www.ohchr.org/sites/default/files/Documents/Issues/IPeoples/FreePriorandInformedConsent.pdf>

<https://www.un.org/development/desa/Indigenouspeoples/publications/2016/10/free-prior-and-informed-consent-an-Indigenous-peoples-right-and-a-good-practice-for-local-communities-fao/>).

Gendered violence issues are also not included and are relevant to the increased burden on healthcare. Military sexual violence is an increasing problem, and 5 cases have been revealed in Okinawa in the last year. Gendered and sexual violence must be included in the EIS. It is also a known fact throughout the Asia Pacific region, that with amplified U.S. military exercises, also comes a rise in crime and sexual or gendered violence. The American Psychological Association has reported an estimated 25% increase of military sexual assaults since 2018

<https://www.apa.org/monitor/2024/03/military-sexual-assault-prevention-efforts#:~:text=within%20its%20ranks.->

[.The%20move%20comes%20after%20an%20estimated%2025%25%20increase%20in%20military.of%20People%20Analytics%2C%202023](https://www.apa.org/monitor/2024/03/military-sexual-assault-prevention-efforts#:~:text=within%20its%20ranks.-.The%20move%20comes%20after%20an%20estimated%2025%25%20increase%20in%20military.of%20People%20Analytics%2C%202023)). However, the Draft EIS fails to include this as a substantial potential risk for health and public safety. We are concerned with the risks of increased crime, and sexual and gendered violence that may result from the enlarged presence of military personnel. Many reports have shown that despite many efforts, sexual violence continues to rise in the U.S. military combined with a longstanding problem of:

<https://www.npr.org/2024/07/12/nx-s1-5035032/sexual-assault-cases-involving-u-s-military-personnel-strain-relations-with-japan#:~:text=ANTHONY%20KUHN%2C%20BYLINE%3A%20In%20court,Two%20have%20resulted%20in%20arrests.>

77B

<https://www.npr.org/2024/07/12/nx-s1-5035032/sexual-assault-cases-involving-u-s-military-personnel-strain-relations-with-japan#:~:text=ANTHONY%20KUHN%2C%20BYLINE%3A%20In%20court,Two%20have%20resulted%20in%20arrests.>

[https://www.stripes.com/branches/marine\\_corps/2024-07-22/okinawa-troops-alleged-sex-crimes-14558062.html](https://www.stripes.com/branches/marine_corps/2024-07-22/okinawa-troops-alleged-sex-crimes-14558062.html)

<https://www.asahi.com/ajw/articles/15352930>

<https://theintercept.com/2021/10/03/okinawa-sexual-crimes-us-military/>

<https://www.militarytimes.com/news/your-military/2023/04/27/sexual-assault-in-the-military-keeps-rising-while-prosecutions-fall/>

<https://www.npr.org/2023/03/12/1162861309/military-academies-sexual-assault-survey>

<https://www.hillandponton.com/facts-on-military-sexual-trauma-and-statistics/>

The U.S. should focus its resources on GENUINE SECURITY: housing, education, healthcare, education, food and water security, and healthcare, rather than wasting resources to displace Indigenous people and spoil lands and waters to be set up to as stomping grounds for war games, and collateral damage. War is not inevitable, and we oppose setting up our islands to once again be the stomping grounds for a conflict between imperial powers. We do not consent to the continued destruction, contamination, and desecration of our island for “national security.” We do not consent to being collateral damage. We must demand **genuine security**, without the threat of contamination to our soil, air, and water, without the desecration of sacred sites and remains, without the erasure of our heritage, without the loss of important food resources and other threats to food security, with housing, and in peace without the threat of war. **We demand that local,**

**national, and international leadership on all sides prioritize peace, diplomacy, decontamination, and disarmament to prevent another war.**

**We repeat our passionate opposition to this proposal and our support for the No Action Alternative. Furthermore, we support and concur with the extensive, substantive comments submitted by Our Common Wealth 670.**

Thank you and Si Yu'os Ma'åse'.  
Sincerely, on behalf Prutehi Guåhan  
Monaeka Flores, Core Member  
Jessica Nangauta, Board Chair

## Comment 78

### Commentor Information

Name	Organization / Affiliation	Comment Format
Franklin B. Mundo	N/A	postal mail

*Legend: N/A = not provided*

### Text of Comment

[Text of comment begins on the following page]

**Comments – June 2025 – RVSD CJMT ENVIRONMENTAL IMPACT STUDY (EIS)**

**(Commonwealth Joint Military Training)**

July 2025 - Franklin B. Mundo, San Jose, Tinian, MP

The CJMT EIS must include provision to thoroughly clean Tinian before they add more layers of toxic and other harmful chemicals. This island has been contaminated by WWII followed by an incident involving the Micronesian Development Company (MDC) sometime in the 1980's allegedly burying fertilizers that saw the involvement of U.S. Environmental Protection Agency (EPA). I remember seeing people in protective suits working during the night. I could see people digging, bagging with lots of other activities. Cattles were killed as result of this incident; a serious one I believe.

During the 70th WWII Commemorative event in Tinian, WWII veterans were invited and were talking to local people about the things they buried at the Northern part of the island.

Chulu Beach, Hagoi, Old Village and Pina I believe are contaminated with napalm too. I also found cement tanks (looks like water cistern) at "Barcinas Point" and the areas around the former Mendiola's Ranch with lots of 55-gallon unopened tars. A lot of drums have since rusted and spilled out into the ground. These drums contained tars used to construct roads. I have yet to hear of any plans or proposal for a major clean up. I remember seeing tar spilled on the road that would stick to the car tires on a hot day. Rehabilitation of runways have since buried barrels deeper into the ground.

These toxic materials may have since seeped into the water aquifer and CUC has yet to conduct test to identify those harmful chemicals in our present water system consume by the community.

One of the most serious concerns I have is the presence of asbestos in our water and soil. There are still water pipes made with asbestos that have been improperly stored or left outdoors with no protective wrappings. These asbestos pipes were used by the Americans.

Of major concern is the "Bomb Depot" also called the "Masaluk Ridge" located along the shore of the Pina area all the way to Masaluk historical site littered with American (assorted bombs including those up to 500-lbs). Some if not all these bombs have rusted making them an extremely hazardous trigger to a series of explosions for the rest of the bombs stored in the area. This same area was at one time planned to be designated for "land Fill" purposes however, after testing of the soil, it was ruled out as the test revealed that 100% of the soil has been contaminated. The Division of Public Land had to pay some \$200,000 to get these remnants in one area. This is the biggest injustice to the people of Tinian as we did not bring these remnants into the island as well as the entire Marianas region yet, it was made our responsibility to provide the finance to ensure these unexploded bombs are store in one area.

Both the Japanese and Americans are equally responsible for the contaminations of our soil, water and shores. Responsibilities for clean-up must also include those remnants in the water

along our shorelines as well as in those deeper areas such as those found in present harbor. Because of multi-generational health implications of these toxics to our people, the clean up must be address with the utmost priority and set as a condition prior to any plans to exacerbate the condition by building Firing Range, as well as other proposed military training activities.

The price of the Commonwealth political status with the United States, I believe is just a little too costly for us. There is something wrong with this situation when one brings in the toxics and the people who are harmed gets to pay for the clean-up.

Submitted by:

  
F. B. Mundo

## Comment 79

### Commentor Information

Name	Organization / Affiliation	Comment Format
M. Adriano Palacios	N/A	postal mail

Legend: N/A = not provided

### Text of Comment

#### COMMENTS : Rvsd. CJMT EIS – June 2025

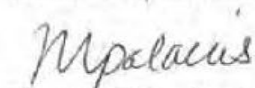
My experience with the initial presence of the military and those contractors associated with the military build-up on island has been very, very negative. I am an owner of a small cattle ranch on Tinian and a member of the Tinian Cattlemen's Association. Early meetings with military representative revealed a plan to relocate some of the ranchers to areas that would be use by the military however, it was to be on a "year-to-year" basis. Prior to this information, another team informed the ranchers that depending on the distance of the site for relocation, there may be some compensation by the military.

Other than subsistence farming that has sustained the local population for some time, cattle ranching as well as raising chickens, pigs, ducks, goats augmented the livelihood of the people. The absence of other economic activities such as commercial fishing and manufacturing kept people at the subsistence level. The gradual expansion of cattle ranching saw little increase in generating the much-needed cash to take care of family needs. Much of the goods are still imported are very, very expensive especially different varieties of meats.

At meetings, military team would often state that they want to be "good partners" and "good steward" to the island as well as to the entire Micronesia region. This is contrary to my experience; I was instructed that I need to keep the size of my ranch at a certain acreage and, was told that the military needs to take 25 feet into my cattle ranch. The contractor opened and removed my fence and often times left the "ranch gate" unsecured. I would get calls from community members that my herds were in the middle of the road making it hazardous to drivers especially at night. Contractors often leave the fence unsecured resulting in herds wondering out of the fence. Contractor informed me that there was nothing in their contract that they would have to repair and restore the fences they removed. Military are of the position that they need that addition 25 feet. Contractor eventually repaired my fence but not to standards after much stress and struggle. Additionally, I've lost approximately 10-20 heads. I found the CNMI as well as the municipal government to be very unsupportive of the cattle industry in situation like mine. I was even told at one of our meetings that I "did not have any rights because I was simply a tenant." The cattle industry is the only economic option at this time that has significantly expanded over the years with little or no support.

The Rvsd. CJMT needs to be thoroughly explained to people so they truly understand what it means at a personal level; something that I had gone through being a rancher. The military will do anything they need to do to accomplish their goal and, based on my experience, they are not "good partners, are not "good stewards" and I no longer believe what they have to say. I feel like the local people are left to fend for themselves.

Submitted by M. Adriano



San José, Tinian Commonwealth Northern Mariana Islands

79A

## Comment 80

### Commentor Information

Name	Organization / Affiliation	Comment Format
Antonio Sn. Borja	N/A	postal mail

*Legend: N/A = not provided*

### Text of Comment

[Text of comment begins on the following page]

**Comments – Rvsd. CJMT EIS June 2025**

Antonio Sn. Borja, San Jose, Tinian MP 96952

As an indigenous citizen of Tinian and a resident since birth, I strongly recommend the following to preserve the safety, health and wellness of our people, and the peaceful co-habitation of our people and the federal government.

**NOISE POLLUTION**

The noise created by aircraft has been very disturbing to people like myself with health issue. I had experience with aircraft flying very low creating vibration that I felt deep through my body...somewhat like a “boon box blasting very close to me. The sound startled me and I was scared for me as well as for the safety of my grandchildren, on another occasion, I did not know that there was training going on the northern part of the island and took my family including my grandchildren for a picnic. On the way to the beach, I heard helicopters flying above with popping sounds like gun fire. I was startled and drove at high speed out of the area fearing for my children and grandchildren.

80A

Mr. Hashimoto responded that the popping sound was not a live gun fire. The point I was trying to make is that I did not get the information that there was training going on and that we needed to keep out of the area. Communication to the civilian population, at least for me and my family, failed. The safety of all people is of paramount concern and communication must be released days (3-5 days head) if not weeks ahead of time. Warnings must be in all official languages; Chamorro, Carolinian and English. If at all possible, there’s been significant increase of the Filipino immigrants and warning must also include Tagalog. Perhaps windows designed to lessen noise should be installed by the CJMT at the Public Library, primary and secondary schools and the health clinics.

**INTERRUPTIONS ON COMMERCIAL AIR TRANSPORTATION AND OTHERS**

80B

I am also concern about medical evacuation of local people. I have a heart condition and I cannot be delayed in situation when I need medical services only available in Saipan. Emergency situation has to be under control of someone located in Tinian with the authority to make the decision to stop training determined to be barriers for all medical air evacuation. Heart patients like myself cannot delay medication intervention.

**ACCESSESSIBILITY**

80C

I fish to subsidize my livelihood. The Firing Range as proposed will significantly and negatively impact on my fishing income. The Wahoo Run, Tuna Run, the Snapper areas and other seasonal fish will not be accessible during its season as the IES did not include a calendar

80C

align to the seasonal fishing that we depend. It is our tradition to remember and honour those that have since passed on at the site we loss them....access to such sites must be allowed during the month of November.

Significant number of people do not have computers or internet services in their home to allow for meaningful and purposeful review of the EIS. The document was made available on-line for those what can afford purchase of computer and internet services with no translations (Chamorro and Carolinian).

#### **USE OF OFFICIAL LANGUAGES**

80D

All information for public consumption must be in the three (3) official languages of the CNMI (Chamorro, English and Carolinian). The Rvsd. CJMT EIS did not get translated in its entirety for the public. Written form of the same was not available to all sectors of the community.

#### **USE OF AVAILABLE MASS MEDIA**

The most available media using the official three languages of the Commonwealth is the radio station (KKMP) as well as what the three island communities of SAIPAN, TINIAN and ROTA most commonly used shall also be used to disseminate information of which priority be information about the health and safety of the CNMI communities.

#### **OTHER SAFETY SYSTEM**

80E

Installation of a Warning Sign – raising of red flags in highly visible and conspicuous areas at the harbor, marina area and other frequently used by the community to ensure that information is reaching the general population and Tinian. This is especially true for fishermen, tour operators and the general public in Saipan, Tinian and Rota as the ocean has been considered highways connecting the islands. Erect flag poles with designated colours (along with explanation) at the harbor, marina and other coastal areas along the route from Tinian to Saipan and to establish routes for ships and boats from Rota and Guam to be able to see and take the appropriate route.

#### **MEDICAL EMERGENCY**

80B

There must be an office with telephone contact information manned 24/7 to cease affected training activities to effectuate immediate respond to medical emergencies requiring hospital care out of Tinian, Saipan or Rota.

80D

#### **EQUAL RESPONSIBILITY**

80D

Each military branch whether it be the U.S. Marines, the U.S. Air Force or others must exercise prudence in the overall safety of people in the community. This includes reporting of incident to the appropriate civilian population (beyond the politically elected offices) to the constitutionally assigned agency, as well as the military designated agency.

80C

#### **COST OF LIVING**

Re-directing of flight pattern will see increase of fuel and other organizational requirements to provide air transportation during training. This will inevitably be passed on to the consumers that would take domino effect. The same will happen to fishermen, tourism offering recreational boating activities and others. This is an important component of the overall impact as it directly as results of both Air Force Divert Airport as well as the CJMT....not to mentioned other activities such as those emerging from the MITT and MERC.

80D

#### **RECORDINGS OF MEETINGS AND CONDUCTS**

It must be a standard procedure for any military community outreach meetings to be recorded electronically; copies to be provided to all public libraries as well as to the CNMI Archive at the Northern Mariana College. This is to ensure that people are accountable of what agenda items were discussed, recommendations made, and agreements reached by the parties concerned. It has been the experience of our local people when "promises" were made or commitments or statement that were never delivered or with people engaged in discussions with inappropriate behaviours unbecoming of professionals and must be held accountable as in the incident involving a representative of CJMT with a young lady at the Rota Outreach meeting.

A.Sn. Borja

**Comment 81**

**Commentor Information**

Name	Organization / Affiliation	Comment Format
C. Cepeda	N/A	postal mail

*Legend: N/A = not provided*

**Text of Comment**

[Text of comment begins on the following page]

COMMENTS – Rvsd. CJMT June 2025

Submitted by: C. Cepeda

81A

My initial reaction during the Community Outreach meeting conducted by the Dept. Of Defence team at the Tinian High School cafeteria was that of confusion as to the general or overall goal of the meeting. The manner in which the presentations was designed was to discourage meaningful discussions. On one of the small groups addressing Noise pollution was particularly interesting. My experiences on the military aircraft “landings and take off” activities have been very disruptive on my family’s sleeping pattern; the noise disrupt our sleep as the vibrations from the sound rattles our windows in addition to the loud sound making sleep impossible. Looking at the map in reference to my location and the rest of the Marpo Valley residents, we are sandwiched in between the Firing Range in Pina and the runways currently being used. The presenter shared that “a little increase of noise but nothing significant”. That statement was inappropriate as it would be the local population that would determine what is “a little increase” and what is not. Noise that awakens anyone from one’s sleep is significant that eventually will impact negatively on our health. Presentation should have been focused on what data has been gathered and not make inferences. While I am cognizant that the chances of the DoD relocation the runways as well as the Firing Range, DOD must be required to be engaged in a joint planning team with the affected population in developing mitigation plans that would include, specific activities, timelines and evidence of completion. Mitigation must include replacement of windows, doors and other parts of the residential structure to reduce the noise and allow people to rest without interruptions.

81B

As a former teacher of many years teaching middle-school age students, it has been my experience and observation that our students here on Tinian often times lacked the emotional maturity making personal decisions affecting their sexuality. Behaviours at times were inappropriate especially as observed by people of other cultures. During this teen years, parental guidance should be at its peak with focus on what is appropriate and what is not with reference to relationships and sexuality. My own experiences saw parents and guardians oftentimes relax their guidance during these young adults’ life. Instead, parents should be more vigilant on their responsibilities and in the absence of such, young adults depend on their peers, social media and of course television. These young adults were in very vulnerable situation putting them in harms way especially when military men are released into the general population on “liberty”. We’ve already had incidents when middle-school age girls skipped class and were found where military men were working within the civilian population behaving inappropriately and interpreted by the men to be invitations to something sexual. It has been documented especially in the experience of the Okinawa community when such men perpetrated heinous crimes against women including gang-rape and murders.

I see expanded role of teachers that would include counselling services other than delivery of instructions as someone has to provide such young people the much-needed guidance. Similar

incidents were evident by the increase referrals to the school administration for intervention on students leaving campus and were found with men in uniform.

The initial impact has already tested the ability of the current law enforcement that revealed a team that is in critical need for professional development especially in crimes against women and children. We have yet to hear of plans by the elected leaders on how this anticipated social impact will be addressed. Tinian with a population that would be overwhelm by the mere number of troops' presence will see a multitude of negative impact on its population. The Revised EIS failed to assess impacts on the people and how such massive activities would demand changes in the lives of people.

I would recommend that the local government; the elected people need to create the opportunities for the local population to engage in meaningful discussions, make available 'experts' in various areas identified in the IES anticipated to have impacts on the island and its people. Areas such as toxic elements ejected by ammunitions from both Firing Range, equipment anticipated to be used in amphibious exercises, disturbance on the shoreline or coastal areas caused by many military exercises and, expertise in the area of how military bases and activities have impacted in other jurisdictions. Those currently living in areas where there are significant military activities; airports, major roads, harbors so they can share their experiences and findings on how a particular community addressed those stresses inject by the military presence.

Given our experiences with the military and the many versions of what was to happen as well as benefits to be enjoyed, it would be virtually impossible to believe and trust what is being said in meetings; very brief meetings at that. The Rvsd. CJMT is not an easy report to understand, analyse and draw inferences on how such a massive military technical plan will affect a tiny island with its tiny population. Both the CNMI as well as the municipality government must take responsibilities in preparing the people for the enormous impact that would "hit" the island community and "rattle" it like a 9.9 strength tsunami. I would recommend to the Municipal government as well as that CNMI Legislature to create a panel consisting of people from the community to review and make recommendations on how disruptions resulting from the CJMT as well as MITT, MERC and others are to be mitigated and incorporated into contracts awarded to contractors of the DOD. Additionally, our CNMI government must ensure that on a periodic basis, soil, air and water testing be done to ensure that there are no elevated toxicity for the people to Tinian and that closure of any military activities must include clean-ups.

Submitted by:



C. Cepeda

Marpo Valley, Tinian, Commonwealth Northern Mariana Islands

## Comment 82

### Commentor Information

Name	Organization / Affiliation	Comment Format
N/A	CNMI Office of the Governor, David M. Apatang	postal mail

*Legend: N/A = not provided*

### Text of Comment

[Text of comment begins on the following page]



**David M. Apatang**  
Governor

**Dennis James "DJ" C. Mendiola**  
Lieutenant Governor

COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS  
**OFFICE OF THE GOVERNOR**

August 13, 2025

GOV2025-109

Honorable Mark Hashimoto  
Executive Director  
U.S. Marine Corps Forces, Pacific  
Headquarters & Service Battalion  
Camp H.M. Smith, HI 96861

Dear Mr. Hashimoto:

Thank you for your time in meeting with me during your recent visit to the CNMI, and for the opportunity to speak in detail about the CNMI Joint Military Training (CJMT) initiative. While CJMT has been many years in development, the work and commitment that have gone into the Revised draft of the Environmental Impact Statement reflect a serious effort to craft a training plan that fulfills the Department of the Navy's mission while accounting for the realities of life in the Commonwealth. I appreciated the chance to exchange views on the Revised EIS, to discuss practical steps that can make the final plan stronger for both sides, and to note the Department's flexibility in allowing additional time for our comments. That extension has given my administration and our community the opportunity to engage more fully and prepare thoughtful, informed input.

As a follow-up to our discussion, I am putting in writing several points that I believe will help us reach those goals and strengthen the plan for both the Navy and the Commonwealth.

- 1. Mitigate impacts to CNMI fishers through deployment of Fish Aggregating Devices (FADs).

82A

The EIS notes that temporary activation of the surface danger zone in waters north of Tinian during live-fire training could significantly affect fishing and boating. To offset this impact, the Navy should coordinate with CNMI Fish and Wildlife and the fishing community on Saipan, Tinian, and Rota to acquire and deploy FADs in accessible locations, ensuring that fish stocks remain available when access to traditional fishing areas is restricted.

- 2. Remove .50 caliber ammunition from proposed training to reduce noise impacts.

The EIS acknowledges that new sources of noise from certain training activities may be audible in inhabited areas, including San Jose and the southern tip of Saipan, where homes, hotels, schools,

and community centers are located. Eliminating the use of .50 caliber weapons at the site would reduce potential noise impacts without affecting the Navy's training requirements in the region.

3. Commit to long-term study of Tinian groundwater impacts.

82B

While the EIS modeling concludes that new potable and non-potable wells will not affect water quality or salinity, the analysis naturally reflects only current conditions. Because the Tinian aquifer is critical to the island's population, it is essential to conduct continuous monitoring to confirm these projections. The Navy should partner with the CNMI government to fund and conduct ongoing studies to validate the model's conclusions and ensure the aquifer remains viable.

4. Expedite establishment of Range Control.

82C

The EIS calls for the creation of an on-island Training Area and Range Operations Command to manage scheduling, safety, and coordination with local officials. Accelerating the establishment of Range Control will not only enhance operational coordination but also provide consistent employment opportunities for local residents.

5. Preserve International Broadcasting Bureau (IBB) employment.

82D

The IBB facility on Tinian provides stable employment that supports the local economy. In implementing CJMT activities, the Navy should work to maintain IBB employment levels to help offset potential job losses from other operational changes.

I appreciate the constructive tone of our meeting and look forward to continuing this work with your team so that CJMT advances in a way that supports the Navy's mission while sustaining the people, resources, and economy of the Commonwealth.

Sincerely,



**DAVID M. APATANG**  
Governor, Commonwealth of the Northern Mariana Islands

Cc: Dennis James C. Mendiola, CNMI Lieutenant Governor

## Comment 83

### Commentor Information

Name	Organization / Affiliation	Comment Format
Mona Manglona	Ginen Luta, Para Luta / From Luta, For Luta	transcript (verbal comment)

Legend: N/A = not provided

### Text of Comment

My name is Mona Manglona. I am a daughter of Luta and the founder of Ginen Luta, Para Luta, From Luta, For Luta, a grassroots effort rooted in care, collective protection, and community self-determination across the Marianas. I am writing to formally submit my comment on the Revised Draft Environmental Impact Statement for the CNMI joint military training. While this proposal is centered on Tinian, its consequences stretch far and beyond its shores. The militarization of Tinian is a threat to our entire region socially, environmentally, spiritually, and geopolitically. This is not a local issue. It is a regional, national, and global one, and it demands clarity, transparency, and community-centered accountability, none of which have been upheld.

83A

First, the public comment process itself has been flawed, inaccessible, and extractive. For many in our community, full participation has been impossible. Chamorro and Carolinian translations of the RDEIS were not available until 17 days after the official public comment period began. This delay has materially limited the ability of our elders, families, and first-language speakers to access the information in time to respond meaningfully. Since at least June 23, 2025, key links have been broken on the project website, including document download portals. To this day, some remain inaccessible.

These technical issues have further delayed public access and taken time away from the 75-day window, a window that is already insufficient given the size and scope of the materials. The decision to release this Revised EIS at the same time as another major environmental document, the M-I-T-T, MITT supplemental EIS, has made it even more difficult for community members to keep up, especially when there has been little to no public-facing explanation of the differences, overlaps, or cumulative impacts between the two proposals.

This is not informed consent. It is procedural harm, and it must be documented as such. The proposal paints a picture of readiness and opportunity and security, but the actual scope reveals permanent transformation of the island to include two live-fire ranges, explosive training areas, ammunition storage sites, raider towers, and landing zones, a repurposed base camp, and embedded military communications infrastructure, surface danger zones restricting access to culturally and spiritually significant places. This is not temporary training. It's permanent militarization. We are being asked to accept noise, risk, contamination, pollution, cultural loss, and displacement under the false promise of economic growth. But we know that military expansion does not equal development. It creates short-term contracts, not long-term care. It centralizes power in Washington, DC, at the Pentagon, thousands of miles away, and not in our villages, not in our homes, and not in our islands, and it leaves behind damaged ecosystems and strained communities.

83A

Finally, I must raise concern for the continued exclusion of the island of Luta from transparent and participatory processes. While no live-fire activity is formally proposed in the Revised EIS for Luta, we know that infrastructure developments are being advanced through categorical exclusions, a tactic that bypasses the full EIS process and eliminates any requirement for public hearings, environmental justice review, or community feedback.

For all the reasons above, I am formally stating my opposition to Alternative 1 of the Revised Draft EIS. This proposal is not about safety, it is not about sustainability, and it is certainly not about community care. It is about expansion, about control, about turning our islands into a launchpad for global conflict, and erasing the people who have protected this place long before a lease was ever signed. For thousands of years, ancestral lands that our elders, that our ancestors, have been stewards of. We deserve more. We demand better. We do not want to move forward with the continued occupation and expansion of military presence. We do not want to militarize Tinian, we do not want to sideline Luta and do we -- we do not want to confuse extraction for development, and we do not want to mistake our silence for consent. That is the end of my comment.

**Table 1. Responses to Comments**

<i>ID</i>	<i>Comment</i>	<i>Response to Comment</i>
1A	These exercises will increase the number of harmful compounds emitted in our environment, potentially harming children and families that enter the proposed air/sea zone. Several habitats both land and sea could be polluted by exercises in this area.	Consistent with requirements under NEPA, including case law, the Revised Draft EIS provided a comprehensive analysis of potential environmental impacts resulting from the Proposed Action based on best available science. Proposed management measures were included in Table 2.3-1 of the Revised Draft EIS and have been updated in the Final EIS. Additionally, Appendix D of the Revised Draft EIS included best management practices, standard operating procedures, and minimization measures that would be incorporated into the design of the action to avoid and/or minimize environmental impacts to the environment and the community.
2A	The airspace taken up by this exercise would decrease the amount of space for other commercial aircrafts that carry tourists/visitors. Decreasing airspace could potentially harm the tourism market, the only industry that Saipan has.	The Revised Draft EIS analyzed potential effects to civilian and commercial airspace (Section 4.7, Transportation, and Section 4.3, Socioeconomics). There would be no impact to airspace or air travel resulting from the Proposed Action. The Proposed Action does not create new Special Use Airspace, and surface danger zones are designed so that they do not interfere with established commercial or civilian air traffic corridors. Civilian and commercial aircraft would continue to operate normally. If an aircraft were to approach an active surface danger zone during training, Range Control procedures require that live-fire be immediately suspended until the aircraft has safely passed.
3A	Are they going to put a military store here on Tinian?	The USMC is proposing to establish an expeditionary Base Camp on Tinian to support proposed training activities in the Military Lease Area. This expeditionary Base Camp would not include a store (exchange, commissary, etc.).
4A	Public Access for boaters: The area designated for small arms shooting creates new problems for boaters. This includes passenger carrying boaters and fishery boats. This area is a movement area for wahoo fishing from August to December. To substitute this area during firings, will FADs be installed elsewhere to pick up the loss of fish in that area.	<p>Section 4.3 (Socioeconomics) of the Revised Draft EIS stated that the Proposed Action could result in a potentially significant impact to fishers and boaters from the temporary and intermittent activation of the surface danger zone that would extend over the waters north of Tinian during live-fire training at the Multi-Purpose Maneuver Range. The Final EIS has been updated to reflect these impacts would be significant, and clarified proposed management measures to minimize disruptions, as summarized below.</p> <p>The USMC is committed to minimizing disruptions by providing timely public notification (via U.S. Coast Guard Notice to Mariners and other channels), as described in Section 2.1.6 of the Revised Draft EIS. The USMC would continue to work with the CNMI government and Municipality of Tinian to determine the appropriate methods to ensure mariners, including subsistence and night fishermen, receive timely and effective information. Suggestions of communication methods collected from the public during the Revised Draft EIS public comment period have</p>

<i>ID</i>	<i>Comment</i>	<i>Response to Comment</i>
		<p>been added in Section 4.1.3.1 Public Access and 4.3.3.1 Socioeconomics of the Final EIS.</p> <p>To further offset the significant impact to subsistence fishers, the Final EIS has been updated in Table 2.3-1 to include the following proposed management measure:</p> <ul style="list-style-type: none"> <li>• The DoD would work with CNMI to identify federal programs or funding sources needed to support the siting and installation of fish aggregating devices to offset the impacts to subsistence fishers.</li> </ul>
4B	<p>Night fishing - to avoid any accidents, what communication devices will be available to fishermen? Some fishermen does not pay attention to any available outgoing information i.e. alerts or other notifications - what else can you do? Why not use the area east side of Tinian because prominent winds goes east to west and that area is usually rough waters for fishing.</p>	<p>To minimize the risk of accidents during live fire training, including during night or reduced visibility conditions, the USMC would implement layered range safety measures consistent with Marine Corps Order 3550.10 (Policies and Procedures for Range and Training Area Management) and established range operating procedures.</p> <p>Two surface radar towers would be located on the north and northwest coastline of Tinian. When live-fire training is conducted and one of the surface danger zones has been activated, there would be a lit red light on the towers, and a red flag would be flown. An additional safety feature is the surface radar housed in the towers would be used to survey the ocean surface to detect and provide an early warning to Range Control should a boat, or a member of the public or other non-participant, approach the activated surface danger zone from offshore. Should an unplanned encroachment be detected by Range Control (surface vessel or aircraft in the overlying airspace), all training would cease until the non-participant is out of the area. If the range is active prior to surface radar towers being constructed or if surface radar is down for maintenance, trained field spotters would be used. Spotters would be positioned at coastal observation points with unobstructed views of the surface danger zones and would maintain continuous visual surveillance of the ocean surface. Spotters would communicate directly with Range Control to provide early warning of any surface vessels or other non-participants approaching or entering an active danger zone.</p> <p>It is important to understand that, as described in Section 4.1 (Public Access) of the Revised Draft EIS, a surface danger zone would not be a permanently restricted area—the appropriate surface danger zone would only be activated when live-fire events are scheduled. Notification of surface danger zone activations would be made through the U.S. Coast Guard’s Notice to Mariners system, along with other public communication channels.</p> <p>The USMC solicited suggestions from the community on the best means of communicating with the fishing and boating community. Input included multilingual notices, physical posting of schedule and other pertinent information at marinas, and use of social media or radio. As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so</p>

<i>ID</i>	<i>Comment</i>	<i>Response to Comment</i>
		<p>that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. Range Control would also work with the Municipality of Tinian to identify in advance any holidays, festivals, or other important days for which public access is needed. Range Control may adjust range operating procedures for communication based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p> <p>In siting the Multi-Purpose Maneuver Range, USMC range experts considered criteria, as described in the Revised Draft EIS, Section 2.1.5.1 (Training Infrastructure, Multi-Purpose Maneuver Range), and determined there was only one reasonable location and orientation for the Multi-Purpose Maneuver Range (shown in Figure 2.1-6 of the Revised Draft EIS). This location, north of the North Field National Historic Landmark on the northern tip of Tinian, would place the Multi-Purpose Maneuver Range as far as possible from the village of San Jose to minimize potential impacts from training events on residents and also ensure that training activities do not interfere with tourism in the North Field National Historic Landmark and civilian air traffic. This proposed configuration for the Multi-Purpose Maneuver Range would take advantage of the location of the 1940s mapped roads in this area and conform to the shape of the north tip of Tinian, with the northern proposed range boundary following the edge of the natural terrain.</p>
5A	Request the Navy pre-coordinate w/CNMI Division of Fish + Wildlife prior to construction, when the Navy is doing pre-construction biological surveys so CNMI DFW can translocate and move species of concern. Like the coconut crab, wild chickens, wild goats, wild deer, and plants like hot pepper + CNMI protected species to minimize impacts.	CNMI Fish and Wildlife may relocate coconut crabs, wild chickens and other non-federally listed animals and plants from the Military Lease Area, in coordination with Joint Region Marianas.
6A	On the documents page, the links for chapters 3-8, and the appendices are all broken. Please fix these so they can be reviewed.	<p>The Revised Draft EIS was made available to the public as required by NEPA. During the public comment period, the USMC periodically checked to ensure the documents continued to be downloadable. Some individuals had difficulty downloading files from the project website, possibly because of the large file sizes. When this was brought to our attention, we immediately added reduced file sizes to the website to assist in downloading.</p> <p>Printed copies of the document were publicly available at libraries on Tinian, Saipan, and Rota.</p>
9A	<p>I urge the Department of Defense and Navy to:</p> <ol style="list-style-type: none"> <li>1. Provide alternate water wells, with regular water testing</li> <li>2. Remove all live fire and explosive components from the proposed training on Tinian.</li> </ol>	The Revised Draft EIS included extensive analysis of potential impacts of the Proposed Action on Tinian’s aquifer, including groundwater modeling of historic and future community demand with the addition of proposed demand under the Proposed Action during training events, operation and maintenance of the Military Lease Area by Range Control, and during construction of infrastructure. Based on the modeling

<i>ID</i>	<i>Comment</i>	<i>Response to Comment</i>
	<ol style="list-style-type: none"> <li>3. Focus on non-live fire training only, such as logistics, communications, humanitarian relief, etc.</li> <li>4. Fully remove remaining WWII unexploded ordnance.</li> <li>5. Provide military-grade emergency medical facility if training continues.</li> <li>6. Expand military police and fire protection to support local force.</li> <li>7. Reconsider the use of a remote, uninhabited location for live fire training, if truly required.</li> </ol>	<p>results, the proposed new potable and non-potable water wells would have less than significant impacts on groundwater quality on Tinian (see Sections 4.11, Utilities 4.13, Groundwater and Hydrology and Appendix M, Utility Studies).</p> <p>At the request of CNMI, the DoD would fund a one-time hydrogeological study to establish baseline data that could be used to support monitoring of Tinian’s aquifer. This study would consist of groundwater sampling at existing well locations, and laboratory testing of water samples. In addition, the DoD would install up to four groundwater monitoring wells at each of the two live-fire ranges, establish a water monitoring plan, and include one year of baseline monitoring before ranges would become operational. The locations of wells would be determined in collaboration with CNMI Bureau of Environmental Quality (refer to Table 2.3-1 of the Final EIS).</p> <p>As discussed in Chapter 2 (Proposed Action and Alternatives) of the Revised Draft EIS, the USMC considered new ways to provide training using simulation, but there are limits to the realism that current technology can provide. Unlike live training, computer-based training does not provide the requisite level of realism necessary to attain combat readiness. Live-fire training as part of Live-Virtual-Constructive training would still be required within the Military Use Area.</p> <p>Section 4.3 (Socioeconomics) of the Revised Draft EIS discussed impacts on emergency medical services. As described, military personnel training on Tinian should have little to no impact on the capacity of Tinian public health services because training units would provide medical and first aid capabilities via medics for each training event, with serious medical emergencies evacuated off island for care. The training unit would coordinate response and communications as part of training event planning. The USMC would contact U.S. Coast Guard Forces Micronesia/Sector Guam joint rescue sub-center or the CNMI Emergency Operations Center in the event of an emergency.</p> <p>As discussed in Section 3.10 (Public Health and Safety) of the Revised Draft EIS, the U.S. military has ongoing responsibilities to manage and address legacy UXO in accordance with DoD programs and applicable safety standards. If encountered during the construction or subsequent use of the Military Lease Area, any UXO, munitions, or munitions debris that pre-date the Proposed Action (i.e., from World War II or that are unrelated to current or planned military training) would be managed per the Comprehensive Environmental Response, Compensation, and Liability Act response processes and procedures.</p> <p>The Final EIS has been updated to discuss wildfire as a potential hazard in Chapters 3 and 4, including training-related ignition sources, local fire response limitations, and wildfire prevention and risk management measures incorporated into the Proposed</p>

<i>ID</i>	<i>Comment</i>	<i>Response to Comment</i>
		<p>Action. As analyzed, wildfire risks would be managed through training restrictions during elevated fire danger conditions, fuel management and fire breaks, ignition-prevention procedures, and rapid response actions, and would not be expected to result in a substantial increase in wildfire incidents or demand on local fire protection services.</p>
10A	<p>1. Please extend the comment period. At over 400 pages (not including the appendices), and the need for cross-reference to the MIRC and MITT (which is over 1200 pages), it's not enough time for people to digest.</p>	<p>For the Revised Draft EIS public comment period, the USMC provided a 15-day extension for a total of 90 days.</p>
10B	<p>2. Clarify the definition of "tempo" - this term is used repeatedly to describe training frequency and intensity relative to the current baseline of activity but is not clearly defined. Does it refer to an increased number of events, longer duration, or greater force presence? What will be the daily, weekly, and seasonal impact?</p>	<p>The Revised Draft EIS used training tempo to describe frequency, intensity, and duration of events (i.e., frequency [how often], intensity [how many personnel], and duration [how long]). Under the Proposed Action, event sizes and timing are as follows: small events (up to ~100 personnel) 1–2 weeks, routinely throughout the year; medium events (up to ~250 personnel) 1–2 weeks, once per quarter; and large events (up to 1,000 personnel) 2–4 weeks, 2–4 times per year (Table 2.1-1 Training Event Size Categories). These parameters were the basis for the effects analyses across resources.</p>
10C	<p>Table 2.1-1 indicates that small training events lasting 1-2 weeks will occur routinely throughout the year. Section 4.1.3 explains that training from the Multi-Purpose Maneuver Range may require a SDZ extending anywhere from 1 to 4 miles outward. How often will this be activated?</p>	<p>As described in Table 2.1-1 and Section 2.1 (Proposed Action) of the Revised Draft EIS, small training events of up to 100 personnel may occur routinely throughout the year, generally lasting one to two weeks each. These training events include pre-live-fire activities (e.g., planning, rehearsal, and setup), a limited period of live-fire training, and post-training activities (e.g., recovery and debrief). Use of the surface danger zones associated with the Multi-Purpose Maneuver Range would be temporary and only active during the periods when live-fire training is conducted and would not remain active for the full duration of a training event. The surface danger zone would be deactivated immediately following completion of live-fire activities. Range Control would issue advance public notifications prior to surface danger zone activation and ensure access restrictions are lifted promptly once live-fire training concludes.</p> <p>The surface danger zone in effect would depend on the type of ammunition used:</p> <ul style="list-style-type: none"> <li>• 5.56-millimeter ammunition: surface danger zone extends about 1.1 miles offshore (used approximately 70 percent of the time)</li> <li>• 7.62-millimeter ammunition: surface danger zone extends about 2.5 miles offshore (used approximately 20 percent of the time)</li> <li>• 0.50-caliber ammunition: surface danger zone extends about 3.2 miles offshore (used approximately 10 percent of the time).</li> </ul>

<i>ID</i>	<i>Comment</i>	<i>Response to Comment</i>
10D	<p>3. Socioeconomic Impact - temporary activations may significantly disrupt small-boat operators, fishermen, and tourism, even if described as "intermittent" or "temporary". Short notice activations will interfere with tour schedules, fishing access, and shipping routes.</p> <p>4. In a similar vein, PLEASE highlight the request in 4.3.3.1 which acknowledges the concern in my above comment and explicitly requests public input to assess impacts. No other part of the EIS has such a request and this needs to be underscored so that a bigger picture can be provided. Without this, it makes no sense that the tables on ES-7 could list socioeconomic impact as "less than significant".</p>	<p>As described in Section 4.3 (Socioeconomics) and Section 4.1 (Public Access) of the Revised Draft EIS, training would occur intermittently, and closures of nearshore or offshore areas would be temporary and limited to periods when live-fire activities are conducted. Nevertheless, the Final EIS acknowledges a significant impact to fishers and boaters from activation of surface danger zones and the restrictions that would occur while live-fire training is occurring. The effects of the additional travel time or costs would be significant to fishers and boaters. The DoD would work with CNMI to identify federal programs or funding sources needed to support the siting and installation of fish aggregating devices to offset the impacts for subsistence fishers.</p> <p>Text has been added to Section 4.3.3.1 stating: “The activation of surface danger zones would also affect commercial shipping vessels transiting in the waters north of Tinian. In comparison to daily fishing and boating, commercial vessels would be present less frequently, and include smaller commercial shippers and approximately four barge trips per month. In order to minimize impacts to shipping schedules, Range Control would coordinate with the Commonwealth Ports Authority to ensure scheduling of training events is understood and communication about shipping schedules is known and any temporary access restrictions would be discussed. The USMC would utilize adaptive management to ensure range safety and scheduling requirements are met, and would make adjustments as needed. Therefore, there would be a less than significant impact to commercial shipping as a result of training under Alternative 1.”</p> <p>As described in Sections 2.1.6 (Live-Fire Range Safety Areas) and 4.1 (Public Access) of the Revised Draft EIS, surface danger zones would be temporarily activated during scheduled live-fire events. These areas would not be permanently closed. Notification of surface danger zone activations would be made through the U.S. Coast Guard’s Notice to Mariners system, along with other public communication channels. The USMC would continue to work with the CNMI government and Municipality of Tinian to determine the appropriate methods to ensure mariners, including subsistence and night fishermen, receive timely and effective information. The USMC solicited suggestions from the community on the best means of communicating with the fishing and boating community. Input included multilingual notices, physical posting of schedule and other pertinent information at marinas, and use of social media or radio.</p> <p>As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. Range Control would also work with the Municipality of Tinian to identify in advance holidays, festivals, or other important days for which public access is needed. Range Control may adjust range operating procedures for</p>

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		communication based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).
10E	5. Environmental thresholds and terminology - what does "less than significant impact" mean? Environmental impacts are frequently described throughout the EIS as such but no clear thresholds or metrics are offered. Were these determined by outside agencies? By the USMC? Who decides? Quantitative or qualitative criteria that determines when an impact crosses from "less than significant" to "significant" is a threshold that is needed for accountability purposes. Is there a public dispute mechanism to review the level of significance and adapt management accordingly?	The USMC used best available science in its analysis, which included a qualitative and quantitative approach. Each resource section in Chapter 4, Environmental Consequences, in the Revised Draft EIS included a subsection called "Approach to Analysis." This subsection discussed how the analysis of potential impacts was considered. The public comment period allowed for input on the methodology, analysis, and conclusion of potential impacts. Significance determinations are within the discretion of the federal agency.
10F	6. Solid Waste - the plan proposes use of Saipan's Marpi landfill for solid waste until a site in Tinian is approved and operational. Marpi is already facing capacity concerns, and the CNMI estimates the permitting process for a new Tinian landfill would take 5 years. Has the process begun, and what is the overall timeline for establishing a military-use landfill on Tinian? How would the increased Marpi waste burden (estimated in Table 4.11-4) be managed or mitigated?	<p>As stated in the Solid and Hazardous Waste Study, Section 5.2.2 of the Revised Draft EIS: "The Marpi Landfill operation has more than adequate daily operational capacity to absorb the additional disposal tonnage from the Proposed Action. The remaining operational life of the landfill, as previously noted, is approximately 26 years at current disposal rates (GHD, Inc./Gershman, Brickner, &amp; Bratton, Inc. December 2019). The additional average daily disposal tonnage from the Proposed Action, if accepted at the Marpi landfill, would represent an increase of approximately 1.7 percent and would be expected to result in a decrease of remaining operational life by approximately 0.5 years from approximately 26 years to 25.5 years." The increased tonnage from the Proposed Action would result in a small increase to the Marpi Landfill but would not significantly impact the landfill's operational life.</p> <p>Section 4.11.3.3 (Utilities, Solid Waste) of the Revised Draft EIS specifically outlined the options that would be utilized for management of solid waste generated by the Proposed Action based on the availability of local management options. These included: 1) transport CNMI Joint Military Training solid waste to the Marpi Landfill on Saipan; 2) on-site incineration, which would reduce the amount of waste landfilled; or 3) transport the residual waste to one or more off-island facilities authorized to accept DoD waste for final disposal.</p>

<i>ID</i>	<i>Comment</i>	<i>Response to Comment</i>
10G	<p>7. Surface Danger Zone Warnings - How, in clear terms, is public access restricted during exercises? While the USCG Notice to Mariners is cited as the notification method, there is no detail on how to ensure timely, clear, and multilingual warnings, especially for non-commercial or subsistence users. Is there a coordinated civilian alert system in place that Range Control will coordinate with? Is there a real time enforcement method that Range Control will utilize before the surface radar is operational? The current plan is to utilize spotters to locate boats entering the SDZ during live training who will communicate sightings with Range Control, who in turn shuts down activity until the boater is out of the SDZ. Is there a better way?</p>	<p>Two surface radar towers would be located on the north and northwest coastline of Tinian. When live-fire training is conducted and one of the surface danger zones has been activated, there would be a lit red light on the towers, and a red flag would be flown. This practice is consistent with Marine Corps Order 3550.10 (Policies and Procedures for Range and Training Area Management) and other USMC range standard operating procedures. An additional safety feature is the surface radar housed in the towers would be used to survey the ocean surface to detect and provide an early warning to Range Control should a boat, or a member of the public or other non-participant, approach the activated surface danger zone from offshore. Should an unplanned encroachment be detected by Range Control (surface vessel or aircraft in the overlying airspace), all training would cease until the non-participant is out of the area. If the range is active prior to surface radar towers being constructed or if surface radar is down for maintenance, trained field spotters would be used. Spotters would be positioned at coastal observation points with unobstructed views of the surface danger zones and would maintain continuous visual surveillance of the ocean surface. Spotters would communicate directly with Range Control to provide early warning of any surface vessels or other non-participants approaching or entering an active danger zone.</p> <p>As described in Sections 2.1.6 (Live-Fire Range Safety Areas) and 4.1 (Public Access) of the Revised Draft EIS, surface danger zones would be temporarily activated during scheduled live-fire events. These areas would not be permanently closed. Notification of surface danger zone activations would be made through the U.S. Coast Guard's Notice to Mariners system, along with other public communication channels. The USMC would work with the CNMI government and Municipality of Tinian to determine the appropriate methods to ensure mariners, including subsistence and night fishermen, receive timely and effective information. The USMC solicited suggestions from the community on the best means of communicating with the fishing and boating community. Input included multilingual notices, physical posting of schedule and other pertinent information at marinas, and use of social media or radio.</p> <p>As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. Range Control would also work with the Municipality of Tinian to identify in advance holidays, festivals, or other important days for which public access is needed. Range Control may adjust range operating procedures for communication based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p>

<i>ID</i>	<i>Comment</i>	<i>Response to Comment</i>
10H	8. Security and Safety Infrastructure - fencing is not preferred for the Multi-Purpose Maneuver Range or Explosives Training Range because of environmental concerns; instead, signage is proposed as the means to limit access. How will public safety be ensured for children and limited English proficient individuals entering these areas? Could cultural or visual impacts of fencing be balanced with safety needs?	As described in Section 4.1 (Public Access) of the Revised Draft EIS, the ranges would not be fenced. Instead, a combination of warning signage and established range safety protocols would be implemented to clearly mark training boundaries and minimize risks to the public. Range safety protocols would include the use of gates and road guards at controlled access points during training events, the display of warning flags and lights to signal when live-fire training is in progress, and active monitoring by Range Control to enforce safety zones and suspend training if unauthorized personnel are detected. The USMC would work with the CNMI government and Municipality of Tinian to ensure these measures are effective and appropriate, and additional measures would be considered if monitoring indicates that signage and standard safety protocols are not sufficient. This layered approach is intended to ensure that public safety is prioritized.
10I	9. Long-term Monitoring and Adaptive Management - the proposal includes adaptive management procedures but does not mention whether CNMI agencies or communities will have access to ongoing data (e.g. noise logs, complaints, water quality sampling, SDZ breaches, etc.). How might the CNMI formally coordinate with Range Control (and, ultimately, DOD) regarding compliance, mitigation, and community concerns?	<p>On-island Range Control, which would be established by the USMC on Tinian, would be responsible for scheduling training, managing range safety and emergency response, publishing announcements and notices about proposed training, coordinating communications and data requirements, range maintenance, and ensuring environmental regulatory compliance.</p> <p>Range Control would work with the CNMI government and the Municipality of Tinian to identify holidays, festivals, or other important days for which public access to the Military Lease Area is needed. Range Control may adjust range management strategies based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p>
10J	10. Please fix the links for the appendices. IT may have told you they are working, but they are not. I have been unable to access them on four different devices, using Microsoft Edge, Safari, and Chrome. This is an ongoing issue and raises significant transparency concerns.	<p>The Revised Draft EIS was made available to the public as required by NEPA. During the public comment period, the USMC periodically checked to ensure the documents continued to be downloadable. Some individuals had difficulty downloading files from the project website, possibly because of the large file sizes. When this was brought to our attention, we immediately added reduced file sizes to the website to assist in downloading.</p> <p>Printed copies of the document were publicly available at libraries on Tinian, Saipan, and Rota.</p>

<i>ID</i>	<i>Comment</i>	<i>Response to Comment</i>
11A	<p>My primary concern and opposition to the current plan is the closure/restriction of waters between Saipan and Tinian. As you know, for many of us, fishing is a way of life. The proposed closure of certain areas on the northwestern waters off Tinian will impose significant hardships and expose many of us to dangerous sea conditions. For those of us that travel to and from Tinian regularly to visit families, attend funerals, or fish, this will add not only a significant cost to our trips to and from Tinian but it will also prevent us from taking the shortest and safest route between the two islands.</p>	<p>The Revised Draft EIS used training tempo to describe the frequency, intensity, and duration of training events as described in Table 2.1-1. Under the Proposed Action, training events may last from one to four weeks depending on event size; however, live-fire activities occur during only a portion of those events and do not extend for the full event duration. As described in Sections 2.1.6 (Live-Fire Range Safety Areas) and 4.1 (Public Access) of the Revised Draft EIS, surface danger zones would be temporarily activated during scheduled live-fire events. These areas would not be permanently closed. Notification of surface danger zone activations would be made through the U.S. Coast Guard’s Notice to Mariners system, along with other public communication channels. The USMC would continue to work with the CNMI government and Municipality of Tinian to determine the appropriate methods to ensure mariners, including subsistence and night fishermen, receive timely and effective information.</p> <p>The USMC solicited suggestions from the community on the best means of communicating with the fishing and boating community. Input included multilingual notices, physical posting of schedule and other pertinent information at marinas, and use of social media or radio.</p> <p>As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. Range Control may adjust range operating procedures for communication based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p> <p>As described in Section 2.1.6 (Live-Fire Range Safety Areas) of the Revised Draft EIS, if an unplanned encroachment is detected by Range Control (surface vessel or aircraft in the overlying airspace), all training would cease until the non-participant is out of the area.</p>

<i>ID</i>	<i>Comment</i>	<i>Response to Comment</i>
12A	<p>1) create an advisory panel, similar to the one for cultural considerations, but a Noise Advisory Panel.</p> <p>2) Work with the Public School System to meet and educate students on the potential impact and dangers of training areas.</p> <p>3) Create a large visible digital display board or sign on both Tinian and Saipan near busy roads to communicate with the public important schedules and notices.</p> <p>4) Provide solar panels, solar batteries, cool roof coating vouchers for Tinian and Saipan residents and possibly noise cancelling headphones.</p> <p>5) Allow citizens to access the PX stores.</p> <p>6) Work with locals to create a layman’s term version of the project proposal that will clarify central planning impacts including aspects that may affect the quality of life for residents such as the “preferred alternative” option.</p>	<p>As discussed in Section 4.8.3 of the Revised Draft EIS, proposed live-fire and aviation training and construction in the Military Lease Area would generate elevated noise levels but would have a less than significant impact on the public. There may be some temporary disturbance to recreational users or individuals engaged in ranching and grazing in the Military Lease Area, but these effects would be limited in duration and scope. As such, USMC does not believe a Noise Advisory Panel is needed.</p> <p>Related to the Public School System, the USMC would consider opportunities to work with the CNMI Public School System and local school leadership.</p> <p>The suggestion to create a large visible digital display board would be taken into consideration as the USMC continues to refine its communication strategies. Section 2.1.8.1 (Scheduling and Logistics for Use of the Military Lease Area Training Areas and Ranges) of the Revised Draft EIS stated that, "The USMC is committed to developing an approach for community access that balances the need for military readiness with safe public access to the Military Lease Area."</p> <p>As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advanced notice of where, when, and how long training would occur. Range Control would also work with the Municipality of Tinian to identify in advance holidays, festivals, or other important days for which public access is needed. Range Control may adjust range management strategies based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p> <p>Providing solar panels, solar batteries, cool roof coatings or noise cancelling headphones for the community is beyond the scope of the Proposed Action.</p> <p>The USMC is proposing to establish an expeditionary Base Camp on Tinian to support proposed training activities in the Military Lease Area. This expeditionary Base Camp would not include a store (exchange, commissary, etc.).</p> <p>To facilitate public review of the Revised Draft EIS, the USMC prepared a short Executive Summary and utilized summary tables to discuss potential environmental impacts in an easy-to-read format.</p>

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13A	Explosive Site Area - (Mt. Lasso), My biggest concern lies within the explosive area. The reason I bring it up, is because we have hidden medicinal plants and wild fruit bat roosting area. I would recommend moving the explosive area to Pina, the same place where DFEMS denotes the unexploded ordinances.	Prior to clearing for the Explosives Training Range, the USMC would work with the CNMI government and Municipality of Tinian to avoid or minimize impacts to subsistence hunting and gathering. As noted in Section 2.1.5.2 (Explosive Training Range) of the Revised Draft EIS, the range's location was identified after considering safety, operational, public health, community access, and environmental factors. The Revised Draft EIS evaluated potential effects to sensitive habitats (see Section 4.4, Biological Resources), including fruit bat roosting areas and native plant communities. The USMC is consulting with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act. The consultation will be complete and incorporated, as appropriate, into the Record of Decision.
15A	Can prior to doing clearing in the MLA, I ask that the CNMI Fish and Wildlife be notified to remove all Coconut crabs from the MLA areas and be relocated to the 1/3 area of our island.	CNMI Fish and Wildlife may relocate coconut crabs from the Military Lease Area, in coordination with Joint Region Marianas.
18A	1. Line of sight map to the surface radar sight - how far will the boaters be able to see the surface radar?	Line of sight from the water to the surface-radar towers depends on the observer's eye height and weather/sea state. The towers would be approximately 45-75 feet tall. At Site 1 (near Unai Babui), the tower base is about 10 feet above mean sea level; at Site 2 (near Ushi Point), about 36 feet above mean sea level. Using standard earth-curvature approximations, the upper portions of the towers would typically be visible to a small-boat operator (eye height at approximately 6–10 feet) from roughly 12-17 statute miles (approximately 10-15 nautical miles) in clear conditions.
18B	2. My concern about the explosive training range is the Marians fruit bat that is roosting or sleeping in the caves at Mt. Lasso. The explosive sounds will definitely chase and scare them away. The other thing is the explosive will chase any animals away from the area.	<p>As noted in Section 2.1.5.2 (Explosive Training Range) of the Revised Draft EIS, the Explosive Training Range location was identified after considering safety, operational, public health, community access, and environmental factors. Section 4.4.3.2 (Terrestrial Wildlife) of the Revised Draft EIS acknowledges that Mariana fruit bats could be exposed to noise from explosives training on Tinian. The Proposed Action may induce fruit bat startle responses or other temporary behavioral shifts. As such, the USMC is consulting with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act. The consultation will be complete and incorporated, as appropriate, into the Record of Decision.</p> <p>As noted in Section 2.1.5.2 (Explosives Training Range) in the Revised Draft EIS, the proposed Explosives Training Range site is located south of the North Field National Historic Landmark, placing the range away from the village of San Jose and in an area that minimizes potential impacts from training events on residents and natural resources. This includes minimizing potential noise disturbances to sensitive species such as the Mariana fruit bat.</p> <p>Section 4.4.3.2 (Terrestrial Wildlife) of the Revised Draft EIS evaluates potential noise effects on wildlife. Additional information on the basics of sound and the</p>

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		potential effects of noise can be found in “Discussion of Noise and Its Effects on the Environment,” which is provided as Attachment 1 to Appendix J, <i>Noise Study</i> . Specific topics include land use compatibility, noise-induced vibration effects, noise-induced hearing impairment and non-auditory health effects, noise effects on children, domestic animals, and wildlife.
18C	3. My third concern is the jets that will be flying. I was at the cow pasture area attending to the cow. I heard one of the jets flying by and I almost got deaf. My eardrums started to hurt and I had to cover my ears with my hands. Even that I can still hear the loud sound.	Noise impacts were analyzed in Section 4.8 (Noise) and Appendix J of the Revised Draft EIS. Maximum sound levels from fixed-wing aircraft would generally only occur within the vicinity of the runways at North Field during an approach or departure. North Field and its vicinity are located within Training Area C, which would be closed to public access. Closure of this area would continue to occur during military training activities on North Field.
19A	The ground maintenance in The MLA - military land area lease is unclear as to the ongoing maintenance in National Historic properties and roadways are not solidified to the upkeep and beautification maintenance.	Maintenance of roads would continue to be in accordance with the Technical Agreement Regarding Use of Land to be Leased by the U.S. in the Northern Mariana Islands (signed February 15, 1975) and any subsequent amendments. Any issues regarding maintenance of historic properties would be addressed under the National Historic Preservation Act.
19B	The preservation and conservations on wildlife habitats and medicinal and hot pepper is not getting the protection and conservation it deserves during construction phases in the MLA.	The USMC would work with the CNMI government and Municipality of Tinian to avoid or minimize impacts to subsistence hunting and gathering. The Proposed Action would avoid all native limestone forest habitat, limestone coastal scrub, and wetland habitat to avoid and minimize impacts to wildlife species. The USMC is consulting with the U.S. Fish and Wildlife Service and the National Marine Fisheries Service under Section 7 of the Endangered Species Act for potential impacts to threatened or endangered species. These consultations will be complete and incorporated, as appropriate, into the Record of Decision.
20A	2. I feel the roads to the new area should be paved and maintained as respect for the residents of Tinian.	New roads would only be constructed to access training facilities. Maintenance of roads would continue to be in accordance with the Technical Agreement Regarding Use of Land to be Leased by the U.S. in the Northern Mariana Islands (signed February 15, 1975) and any subsequent amendments.

<i>ID</i>	<i>Comment</i>	<i>Response to Comment</i>
20B	<p>3. If there is a fee to dump what will the fees be and for what specifically.</p> <p>4. Compensation to Tinian for military use - possibly a car/metal crusher or equipment to help with a proper dump function. Rubber shredder for tires. The shredded rubber can be used in playground areas.</p> <p>6. Has there been a poll taken for location for new dump? Why was the location chosen in the proposal?</p> <p>7. The roadway to new dump site should be paved as heavy loads tear up gravel roads and it is not good for cars, trucks, nor the roadway.</p> <p>8. Have there been any other locations considered?</p> <p>10. Trash pick up has still not been accomplished - what can be done?</p>	<p>The proposed new Atgidon Landfill location was identified by the CNMI in a process independent of the Proposed Action. The location, design, and trash pickup processes would be the responsibility of the CNMI.</p>
20C	<p>9. Waterway cargo - limitations and closures. How will everyone be notified.</p> <p>13. Will we be given a list of times of flights so that we are prepared to negotiate our responses for instance, I have PTSD and moved back to the island for peace and quiet. I was stressed with hearing sirens quite frequently in the states.</p>	<p>As described in Sections 2.1.6 (Live-Fire Range Safety Areas) and 4.1 (Public Access) of the Revised Draft EIS, surface danger zones would be temporarily activated during scheduled live-fire events. These areas would not be permanently closed. Notification of surface danger zone activations would be made through the U.S. Coast Guard's Notice to Mariners system, along with other public communication channels. The USMC would continue to work with the CNMI government and Municipality of Tinian to determine the appropriate methods to ensure mariners, including subsistence and night fishermen, receive timely and effective information. The USMC solicited suggestions from the community on the best means of communicating with the fishing and boating community. Input included multilingual notices, physical posting of schedule and other pertinent information at marinas, and use of social media or radio.</p> <p>As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. Range Control would also work with the Municipality of Tinian to identify in advance holidays, festivals, or other important days for which public access is needed. Range Control may adjust range operating procedures for communication based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p>

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21A	<p>I was wondering if it is possible to have a presentation of the proposed plan to the students at Tinian High School or to the cadets in the JROTC program in the school. I think this is a great project that is happening on our island and I think the students should be well informed about what is going on. Whether through a presentation during the school year or a field trip up north to see the sites in the proposed plan, like the repurpose IBB, it would be beneficial for both parties since students can be informed about this plan and they can give their comments and/or concerns regarding it. For a school presentation please reach out to the school principal. For a presentation with our JROTC unit, you could contact me, for I am the current Battalion Commander and I would forward it to my instructors and my cadet leadership.</p>	<p>The USMC would consider opportunities to work with the CNMI Public School System and local school leadership.</p>
22A	<p>1. Will all incoming military personnel be conditioned on respecting local customs, wildlife, etc. prior to arrival?</p> <p>3. How involved will all incoming military personnel be with the local community?</p>	<p>All military personnel scheduled to train in the CNMI receive pre-deployment and on-island briefings that emphasize cultural awareness, protection of wildlife, and compliance with environmental regulations.</p> <p>These requirements are reinforced through unit-level training, Range Control procedures, and environmental protection protocols. The intent is to ensure that all personnel conduct themselves in a manner that respects the people, culture, and natural resources of the CNMI while carrying out training activities.</p> <p>Regarding involvement with the community, the USMC is proposing to establish an expeditionary training environment on Tinian with a small supporting Base Camp within the Military Lease Area. Most military personnel would be within the Military Lease Area during training events resulting in minimal interaction with residents in San Jose.</p>
22B	<p>2. How will boats be informed of ongoing live-fire exercises, more specifically coming outside of Tinian, so they may avoid potentially coming within range of stray bullets?</p>	<p>Two surface radar towers would be located on the north and northwest coastline of Tinian. When live-fire training is conducted and one of the surface danger zones has been activated, there would be a lit red light on the towers, and a red flag would be flown. This practice is consistent with Marine Corps Order 3550.10 (Policies and Procedures for Range and Training Area Management) and other USMC range standard operating procedures. An additional safety feature is the surface radar housed in the towers would be used to survey the ocean surface to detect and provide an early warning to Range Control should a boat, or a member of the public or other non-participant, approach the activated surface danger zone from offshore. Should an unplanned encroachment be detected by Range Control (surface vessel or aircraft in the overlying airspace), all training would cease until the non-participant is out of the area. If the range is active prior to surface radar towers being constructed or if surface radar is down for maintenance, trained field spotters would be used. Spotters would be positioned at coastal observation points with unobstructed views of the surface danger</p>

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		<p>zones and would maintain continuous visual surveillance of the ocean surface. Spotters would communicate directly with Range Control to provide early warning of any surface vessels or other non-participants approaching or entering an active danger zone.</p> <p>As described in Sections 2.1.6 (Live-Fire Range Safety Areas) and 4.1 (Public Access) of the Revised Draft EIS, surface danger zones would be temporarily activated during scheduled live-fire events. These areas would not be permanently closed. Notification of surface danger zone activations would be made through the U.S. Coast Guard’s Notice to Mariners system, along with other public communication channels. The USMC would continue to work with the CNMI government and Municipality of Tinian to determine the appropriate methods to ensure mariners, including subsistence and night fishermen, receive timely and effective information. The USMC solicited suggestions from the community on the best means of communicating with the fishing and boating community. Input included multilingual notices, physical posting of schedule and other pertinent information at marinas, and use of social media or radio.</p> <p>As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. Range Control may adjust range operating procedures for communication based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p>
22C	<p>5. What is CUC’s priority in the event that all on-island power lines need repair/maintenance?</p> <p>6. What organization incurs the cost of maintaining the newly established water wells, powerlines, facilities, etc.?</p>	<p>The Proposed Action does not include changes to Commonwealth Utilities Corporation’s priorities for repair and maintenance. The Commonwealth Utilities Corporation would continue to maintain and operate on-island power lines. The DoD would be responsible for facilities that serve military training such as underground power and water wells.</p>
23A	<p>As a community member of the Marianas, I am demanding an extension to both the CJMT and MITT public comment deadlines. There is not enough time to review and respond to these documents.</p>	<p>For the Revised Draft EIS public comment period, the USMC provided a 15-day extension for a total of 90 days.</p>

<i>ID</i>	<i>Comment</i>	<i>Response to Comment</i>
23B	<p>Another demand is that the community has full and accessible public access to the documents. We demand comprehensive in-language summaries that break down the dense, scientific language into clear, understandable terms for our people. Access means more than translation, it means understanding.</p>	<p>The Revised Draft EIS (including Appendices and other supporting documents) have been available since June 2025 and may be found at <a href="https://www.CNMIJointMilitaryTrainingEIS.com">https://www.CNMIJointMilitaryTrainingEIS.com</a>. The website has a downloadable Abstract and Executive Summary in both Chamorro and Carolinian as well as a fact sheet that provides an overview of the proposed training and construction activities and their potential impacts. The fact sheet was available at each public meeting held in June 2025. Printed copies of the document were publicly available at libraries on Tinian, Saipan, and Rota.</p>
25A	<p>We demand:</p> <ol style="list-style-type: none"> <li>1. At least a 45-day extension to both the CJMT and MITT public comment deadlines, because people need more time to review and respond meaningfully.</li> </ol>	<p>For the Revised Draft EIS public comment period, the USMC provided a 15-day extension for a total of 90 days.</p>
25B	<ol style="list-style-type: none"> <li>2. Full and accessible public access to the documents. This would mean printed copies being accessible/available on each island. Additionally, comprehensive in-language summaries that break down dense, scientific jargon into clear understandable terms for people are absolutely necessary. We demand not just translation but also understanding.</li> <li>3. That CNMI agencies w/ environmental and community oversight speak up. Agencies like BECQ, DPL, HPO, and DEQ should review the EIS and publicly submit comments.</li> <li>4. A commitment to meaningful community consent - not just comment collection, because public input shouldn't be a checkbox. Our voices should shape the outcome.</li> </ol>	<p>The Revised Draft EIS (including Appendices and other supporting documents) have been available since June 2025 and may be found at <a href="https://www.CNMIJointMilitaryTrainingEIS.com">https://www.CNMIJointMilitaryTrainingEIS.com</a>. The website has a downloadable Abstract and Executive Summary in both Chamorro and Carolinian as well as a fact sheet that provides an overview of the proposed training and construction activities and their potential impacts. The fact sheet was available at each public meeting held in June 2025. Printed copies of the document were publicly available at libraries on Tinian, Saipan, and Rota.</p>
27A	<ol style="list-style-type: none"> <li>1. Will the CNMI be able to avail to the use of the range when it's not utilized by the military?</li> <li>2. Could we (CNMI) avail to the skillsets brought into the island relative to the CNMI law enforcement agencies.</li> </ol>	<p>The ranges and training areas would be designed primarily for military training and public access would be limited due to safety considerations. Any non-military use would require Installation Commander and Range Control approval, adherence to all range standard operating procedures and safety requirements (including danger zones and Officer-in-Charge/Range Safety Officer oversight), and a formal agreement outlining permitted activities, scheduling, and responsibilities.</p>

<i>ID</i>	<i>Comment</i>	<i>Response to Comment</i>
27B	4. The proposed safety zone may impact shipping lines and I recommend engagement with port operator and users, as it may have some impact to vessels arriving should the training date coincide w/ the training date.	<p>Text has been added to Section 4.3.3.1 stating: “The activation of surface danger zones would also affect commercial shipping vessels transiting in the waters north of Tinian. In comparison to daily fishing and boating, commercial vessels would be present less frequently, and include smaller commercial shippers and approximately four barge trips per month. In order to minimize impacts to shipping schedules, Range Control would coordinate with the Commonwealth Ports Authority to ensure scheduling of training events is understood and communication about shipping schedules is known and any temporary access restrictions would be discussed. The USMC would utilize adaptive management to ensure range safety and scheduling requirements are met, and would make adjustments as needed. Therefore, there would be a less than significant impact to commercial shipping as a result of training under Alternative 1.”</p> <p>As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. In addition, Range Control may adjust range operating procedures for communication based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p>
30A	1. Please make the notification system for Saipan and Tinian.	<p>As described in Sections 2.1.6 (Live-Fire Range Safety Areas) and 4.1 (Public Access) of the Revised Draft EIS, surface danger zones would be temporarily activated during scheduled live-fire events. These areas would not be permanently closed. Notification of surface danger zone activations would be made through the U.S. Coast Guard’s Notice to Mariners system, along with other public communication channels. The USMC would work with the CNMI government and Municipality of Tinian to determine the appropriate methods to ensure mariners throughout the Mariana Islands, including subsistence and night fishermen, receive timely and effective information. The USMC solicited suggestions from the community on the best means of communicating with the fishing and boating community. Input included multilingual notices, physical posting of schedule and other pertinent information at marinas, and use of social media or radio.</p> <p>As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. In addition, Range Control may adjust range operating procedures for communication based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p>

<i>ID</i>	<i>Comment</i>	<i>Response to Comment</i>
30B	2. What is your plan to handle cases of PTSD with the locals? Many veterans and some with issues with gunfire and explosives. Where are they supposed to go during training?	While intermittent training noise cannot be fully eliminated, the public would be notified in advance. As noted in Section 4.8 (Noise) of the Revised Draft EIS, new sources of noise would occasionally be audible beyond the Military Lease Area during some training events (e.g., at residential, education, or commercial areas in San Jose or the southern tip of Saipan), primarily from live-fire training at the Multi-Purpose Maneuver Range and Explosives Training Range and from use of different types of aircraft at North Field and proposed Landing Zones. Noise from training would be temporary, occur intermittently over the course of any given year, and be interspersed with quieter times where less noise-producing activities or even no military training would be audible. Training-related noise may cause effects such as annoyance, but would be unlikely to interrupt conversations, cause classroom learning interference, or disrupt sleep. Effects may vary over time based on environmental factors and individual sensitivity to noise (i.e., under changing weather conditions, it is possible a sound source may be barely detectable one day, but very loud and annoying the next). Range Control may adjust range operating procedures for communication based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).
31A	No live firing range in Tinian Why two firing range?	As described in Chapter 2 (Proposed Action and Alternatives) of the Revised Draft EIS, the Multi-Purpose Maneuver Range and the Explosives Training Range support different training requirements: the Multi-Purpose Maneuver Range provides maneuver and small-arms live-fire capability, while the Explosives Training Range is designed for demolitions and engineer training. Together, they provide essential but distinct capabilities needed for military readiness.
31B	Any compensation for mariners who (traveled?) outside of firing range zone?	<p>There is no legal authority to compensate mariners for extra travel due to the establishment of the surface danger zone; however, the USMC is committed to minimizing disruptions by providing timely public notification (via U.S. Coast Guard Notice to Mariners and other channels), as noted in Section 2.1.6.2 of the Revised Draft EIS.</p> <p>To further offset the significant impact to subsistence fishers, the Final EIS has been updated in Table 2.3-1 to include the following proposed management measure:</p> <ul style="list-style-type: none"> <li>• The DoD would work with CNMI to identify federal programs or funding sources needed to support the siting and installation of fish aggregating devices to offset the impacts to subsistence fishers.</li> </ul>

<i>ID</i>	<i>Comment</i>	<i>Response to Comment</i>
32A	<p>I am concerned about: Live-fire training will leave behind lead, copper, and heavy metals that can seep into soil/groundwater. This threatens local wells, crops, and ocean ecosystems.</p>	<p>As described in Section 4.14 (Surface Waters and Wetlands) of the Revised Draft EIS, the primary condition that would influence the movement or mobility of lead or other metals, such as copper, in an environment is the pH of the soil. The geology of Tinian is predominantly karst, and the soils are derived from limestone bedrock with abundant carbonates and are naturally neutral (pH 6.5–7.0) to alkaline (greater than 7.0). At neutral pH, heavy metals, like lead, become relatively insoluble and the potential for lead to be transported to the ground water or in surface water runoff would be very low (Weil and Brady 2017). Because of the relative scarcity of surface waters on Tinian, best management practices, stormwater management systems, and the natural adsorption of Tinian’s soils, training events under Alternative 1 would have less than significant impacts to surface waters and wetlands.</p> <p>In addition, the USMC would implement best management practices to minimize sedimentation, runoff, and potential spills during periods of construction and during operation (i.e., during training exercises or routine operations and maintenance activities by Range Control). These include erosion control measures such as minimizing the ground disturbance area during construction, adoption of plans or standard operating procedures designed to prevent pollution of water sources and other habitats (e.g., Stormwater Pollution Prevention Plan, Hazardous Materials Management Plan and spill preventions plans, requiring equipment refueling occur at least 120 feet away from water bodies and preferably on an impervious surface). Additionally, any new surfaces resulting from construction of the Proposed Action would be designed to minimize surface water runoff through implementation of low-impact development and best management practices for stormwater management systems. These measures would be developed in accordance with all applicable CNMI regulations for stormwater management and water quality, including applying the principles from the CNMI and Guam Stormwater Management Manual (Horsley Witten Group, Inc. 2006). Refer to Appendix D in the Revised Draft EIS for a list of all best management practices that would be implemented during the Proposed Action.</p>
32B	<p>Amphibious landings introduce oil, fuel, and lubricant spills directly into the shoreline - killing coral reefs harming marine life, and contaminating traditional fishing waters.</p>	<p>The Proposed Action includes ground and aviation training that would occur on-land on the island of Tinian—any in-water training like amphibious landings would continue as currently authorized under the Mariana Islands Training and Testing EIS/OEIS.</p>

<i>ID</i>	<i>Comment</i>	<i>Response to Comment</i>
32C	<p>There is no guarantee of the protection or access to sacred Chamorro sites, including burial grounds, latte sites, or coastal fishing areas. Live-fire training and vehicle movement could destroy these sites forever. That is not just environmental damage, it is cultural violence.</p>	<p>In compliance with NEPA and the National Historic Preservation Act, the Revised Draft EIS analyzed impacts and effects on cultural resources, to include historic properties in Section 4.5. Mitigation to resolve adverse effects to historic properties was developed in consultation under the National Historic Preservation Act with the CNMI Historic Preservation Office, the Advisory Council on Historic Preservation, the National Parks Service, and the Municipality of Tinian. During the 90-day public comment period (June 6, 2025 to September 4, 2025), interested parties, members of the community, including those of Chamorro and Carolinian descent, and the public had an opportunity to comment on the proposed mitigation as presented in Appendix H (Cultural Resources Supporting Information).</p> <p>Public access was analyzed in Section 4.1 of the Revised Draft EIS. This analysis considered the potential impacts of temporary access controls on fishing, boating, subsistence, tourism and recreation, ranching, and cultural activities.</p>
34A	<p>1. During live firing of 50 ca. and within the CNMI 3 miles territorial waters and accidentally hit a marine animal such whale and killed it, who is responsible for cleaning up and disposing of the carcass, cost of cleanup and will they pay for it.</p>	<p>The USMC is consulting with the National Marine Fisheries Service under the Magnuson–Stevens Fishery Conservation and Management Act and the Endangered Species Act regarding potential impacts to marine life and essential fish habitat. The consultation will be complete and incorporated, as appropriate, into the Record of Decision.</p> <p>As noted in Section 4.4.3.4 of the Revised Draft EIS, all proposed training activities would be conducted entirely on land. However, portions of the designated surface danger zone associated with the Multi-Purpose Maneuver Range would extend over adjacent coastal waters. USMC ranges are intentionally designed to minimize the likelihood of projectiles leaving the primary target area. Data from operational assessments and range clearance programs consistently show that nearly all projectiles remain within the land-based portion of the target area. This high level of containment is the result of several safety and design measures: all weapons and ammunition used meet strict DoD standards for performance and accuracy; every operator is certified on their weapon; the firing positions and target locations are arranged to ensure rounds remain within the intended land area; and targets are constructed with materials that help reduce the chance of ricochets.</p> <p>Other factors that would limit the probability of a projectile entering coastal waters would include the native vegetation surrounding the range which would act as a natural buffer, further slowing or stopping projectiles before they could reach coastal waters, and the undulating terrain of the range that would likely stop or slow down ricocheting projectiles. In the event of a ricochet, a projectile would rapidly lose speed due to air resistance, significantly reducing its potential to travel beyond the range boundary.</p>

<i>ID</i>	<i>Comment</i>	<i>Response to Comment</i>
		<p>On rare occasions, a projectile from the Multi-Purpose Maneuver Range may travel outside the target area but still land within the surface danger zone. In the unlikely event that a projectile enters coastal waters, the risk to marine habitats would remain very low. Once a projectile enters the water, it would further lose energy and sink through the water column to settle on the sea floor. Marine mammal data confirm that marine mammal densities in the waters surrounding the CNMI are consistently low. Therefore, it is highly unlikely that projectiles entering coastal waters would result in impacts to marine species.</p> <p>In the unlikely event a marine animal such as a whale experiences a mortality and is stranded ashore, and which the stranding is potentially associated with training activities, the National Marine Fisheries Service would be consulted regarding removal of any carcasses.</p>
34B	<p>Please provide a clear map showing the military (submerged?) land between point to point, the firing range</p> <p>2. What does the CNMI get for using the CNMI's 3 miles territorial water</p>	<p>Training activities would occur only within the designated Military Lease Area, which was leased to the U.S. federal government consistent with the 1975 Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America (“the Covenant”), and Technical Agreement Regarding Use of the Land to be Leased by the United States in the Northern Mariana Islands (“Technical Agreement”), and associated lease, the first of which was signed in 1983. These agreements provide that the Military Lease Area, “may be used for any purpose required to carry out the defense responsibilities of the United States.”</p> <p>On January 15, 2014, President Obama signed Proclamation 9077, <i>Reserving Certain Submerged Lands in the Commonwealth of the Northern Mariana Islands</i>. This Proclamation excepted submerged lands from conveyance by the United States to the Government of the CNMI Northern Mariana Islands pursuant to section 1(a) of Public Law 93–435, as amended by section 1 of Public Law 113–34 (the “Act”). The submerged lands excepted from transfer included the lands adjacent to the island of Tinian and permanently or periodically covered by tidal waters up to the line of mean high tide and extending seaward to a line three geographical miles distant from those areas of the coastline that are adjacent to the Military Lease Area.</p>
35A	<p>What plans are in place to address military junk yard during the early fifties? Junk yard includes old airplanes military (hardware?) used during the war. Please provide answer in the final EIS.</p>	<p>Addressing existing military debris from prior wars is outside the scope of this Proposed Action.</p>

<i>ID</i>	<i>Comment</i>	<i>Response to Comment</i>
36A	<p>As a biologist who surveyed all of the proposed sites for this CNMI Joint Military Training EIS, I strongly oppose the military's location choice for the proposed explosives training range at Mt. Lasso. The island of Tinian has very few remaining pristine limestone forests, the majority of the forested area is occupied by non-native tangan-tangan and other invasive shrubs and weeds. These areas do not offer high quality habitat to most flora and fauna. Masalok and Mt. Lasso, on the other hand, provide the highest quality habitat for endangered species on Tinian. Mt. Lasso specifically is inhabited by the Mariana fruit bat or fanihi (<i>Pteropus mariannus mariannus</i>). This species occupies the forest as there are several high value tree species that provide a variety of food for the fruit bat. The noise that would be generated from an explosives training range would disturb the fruit bats to such an extent that they would not be able to forage or roost without considerable amount of disturbance, most likely so much that they would not be able to occupy the forest anymore.</p>	<p>The vegetation communities that would be affected by the Proposed Action are those dominated by non-native vegetation, such as tangan-tangan. The Proposed Action has been designed such that it would not impact the three most sensitive and ecologically valuable terrestrial plant communities on Tinian: limestone coastal scrub, limestone native forest, and wetland. Additionally, no construction would occur on Mt. Lasso or in the Masalok region.</p> <p>Mariana fruit bats would be exposed to intermittent blast noises from live-fire training and disturbance from human presence (especially due to visual and noise disturbance from training activities) which may induce startle responses or other temporary behavioral shifts. As such, the USMC is consulting with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act. The consultation will be complete and incorporated, as appropriate, into the Record of Decision.</p>
36B	<p>Besides the fanihi, there are 2 other ESA-listed species that would be negatively impacted by this proposed action: Mt. Lasso has one of the highest densities of endemic epiphytic orchids: <i>Dendrobium guamense</i> is a species that is listed as "threatened" under the ESA; it thrives in this forest, and should be protected at all costs, since there were very few other locations on Tinian in which this orchid was detected. Furthermore, the fadang (<i>Cycas Micronesia</i>), which is also listed as "threatened" under the ESA, has been outplanted in several experimental plots at the base of Mt. Lasso. While this species did not historically occur on Tinian, it has been outplanted as a genetic back-up for Guam's cycads, which have been drastically declining in the past years due to the introduction of two invasive species: The Asian cycad scale and the cycad blue butterfly. It saddens me to imagine all the hard work that was invested in making this project successful only for the cycads to be impacted by this sort of activity. Since Asian cycad scale (<i>Aulacaspis yasumatsui</i>) and cycad blue butterfly (<i>Luthrodes pandava</i>) are also present in Tinian, the outplanted trees require regular pest control maintenance to ensure that they stay healthy.</p>	<p>No construction would occur on Mt. Lasso, nor in the vicinity of any <i>D. guamense</i> occurrences. In addition, the only training activities that would occur on Mt. Lasso would be foot patrol maneuvers, in areas that have trails and are open to the public. No effects to the cycads are expected because the nearest individual is approximately 180 meters from any construction activity of the Proposed Action. The USMC is consulting with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act. The consultation will be complete and incorporated, as appropriate, into the Record of Decision.</p>

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36C	As someone who lives on Guam, a practically birdless island, visiting Mt. Lasso is a special treat: a forest filled with the song of so many native bird species, all of which would be negatively impacted by the noise disturbance of this proposed activity.	Military training already occurs within the Military Lease Area, and the Proposed Action would increase the tempo and scope of land-based training by 15 percent. Behavioral and/or physiological responses by wildlife resulting from exposure to noise and human presence as part of training and construction would be short term because impacts would be intermittent and geographically dispersed throughout the Military Lease Area. Because of this and because the Proposed Action would incorporate best management practices, standard operating procedures, and other proposed management measures to avoid or minimize impacts to wildlife (as outlined in Appendix D of the Revised Draft EIS), impacts on native bird species as part of the 15 percent increase would be less than significant.
36D	Lastly, Mt. Lasso is also used recreationally by the people of Tinian for hunting and foraging, especially to collect the sought-after <i>donne sali</i> or red chili pepper. I hope that access would not be restricted to this forest.	The Proposed Action would accommodate public access to the Military Lease Area and allow for flexibility in scheduling military training. To achieve this, the Military Lease Area would be divided into eight smaller, separate training areas that may be scheduled individually or several at a time. The public would be allowed access to those training areas not scheduled for military training when they can be safely accommodated. In fact, some training could be conducted without any controls on public access. However, during some training events, public access may be limited for the safety of the public and service members participating in the training. The USMC would continue to work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. In addition, Range Control would work with the Municipality of Tinian to identify in advance any holidays, festivals, or other important days for which public access is needed. Range Control may adjust range management strategies based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management). Please see Sections 2.1 (Proposed Action), 4.1 (Public Access) and 4.3 (Socioeconomics) of the Final EIS for more information.
37A	<p>Cumulative Impacts and Incrementation</p> <p>This revised “Commonwealth of the Northern Mariana Islands Joint Training and Testing Draft Environmental Impact Statement” (CNMI CJMT DEIS) contains procedural and substantive shortcomings that undermine the National Environmental Policy Act (NEPA) and do a disservice to the public, segmenting interconnected actions that obscure the connectedness of the ever-increasing military build-up in the CNMI and broader Marianas.</p> <p>To ensure meaningful analysis and public awareness regarding the scope of this action, this DEIS must include comprehensive assessments of cumulative impacts from all DoD activities, both locally and globally, to ensure potential</p>	<p>The Revised Draft EIS provided a comprehensive analysis of potential environmental impacts of proposed training on the island of Tinian consistent with the purpose of and need for the Proposed Action. Any proposed expansion or modification of military activities that might be planned for the Marianas Archipelago in the future would undergo environmental review in accordance with NEPA and other applicable statutes and regulations.</p> <p>Consistent with requirements under NEPA, including case law, federal agencies are responsible for evaluating the reasonably foreseeable environmental effects of the agency’s Proposed Action. Environmental conditions resulting from relevant past actions were included as part of baseline conditions in Section 3 of the Revised Draft EIS. Section 4.15 (Cumulative Impacts) of the Revised Draft EIS discussed potential</p>

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	<p>adverse effects on public health, ecosystems, and climate are transparently addressed and minimized in accordance with the NEPA requirements.</p> <p>By not addressing the potential for expanding training onto additional islands within the archipelago during public meetings, the DoD is circumventing the critical process of open dialogue with affected communities and stakeholders. This omission suggests that the current DEIS may represent only the initial phase of a broader, incremental strategy aimed at expanding military control over the region’s lands, waters, and airspace, without fully acknowledging or disclosing the cumulative impacts of such expansions.</p> <p>DoD failed to define “particular time” in contrast to “all actions over time”. This means that DoD does not include past actions in the definition of cumulative impacts, but as shown in the images above past military actions have a lingering (and when not mitigated or removed) have a permanent impact on public health and safety. Therefore, we recommend using “effects of all actions over time”, as the defensible definition of cumulative impacts for the proposed military actions in this DEIS.</p>	<p>cumulative environmental impacts of ongoing and future projects on Tinian and the CNMI.</p>
37B	<p><b>Incorporation by Reference and Hyperlinks</b></p> <p>As we will detail further in the procedural comments that follow, this report lacks basic signposting common to similar impact assessments such as a titled Table of Contents and easily accessible supporting appendices. This DEIS would benefit greatly by having the Table of Contents include descriptive titles for each chapter. For instance, rather than simply listing “Chapter 3.14,” it would be more user-friendly to label it as “Chapter 3.14 Surface Waters and Wetlands,” which would greatly improve navigation for readers seeking specific information. This deficiency made the review challenging to both navigate and reference. Lacking such references, the substantive analysis is particularly difficult and time-consuming, as the basis of all factual statements and assumptions upon which the DoD has determined impacts will be ‘less than significant’, cannot be accessed by the general public. As prior comments on DoD DEISs have noted, accessible hyperlinked references are standard and should be made available to reviewers. Instead, this document does not provide accessible data and frequently appears to reference internal communications which are also not possible to scrutinize. To remedy this, a revised DEIS should provide all information that is public and cited and omit internal communications that cannot be assessed.</p>	<p>The Revised Draft EIS has been prepared in compliance with NEPA and all other applicable statutes and regulations. Chapter 6 (References) of the Revised Draft EIS included a comprehensive reference list organized by references for each chapter and subsections.</p> <p>The full table of contents and appendices were available on the project website: <a href="https://www.CNMIJointMilitaryTrainingEIS.com">https://www.CNMIJointMilitaryTrainingEIS.com</a>. The website has been updated with descriptive titles for downloadable EIS sections.</p> <p>The Revised Draft EIS was made available to the public as required by NEPA. During the public comment period, the USMC periodically checked to ensure the documents continued to be downloadable. Some individuals had difficulty downloading files from the project website, possibly because of the large file sizes. When this was brought to our attention, we immediately added reduced file sizes to the website to assist in downloading.</p>

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37C	<p>Availability, Translations, and Timing of the Revised Draft EIS</p> <p>An open Q&amp;A session with all those present engaged in the conversation was not only lacking, it stymied a true public forum. Meaningful protocols should have been used by DoD to ensure stakeholders would speak freely and be heard by using more traditional and open island communication methods. This includes allowing untimed comments by participants, and translating information, questions, and comments into Chamorro and Carolinian – official languages of the CNMI - as well as other languages used by our very diverse population.</p> <p>The timing of the DEIS publication, coinciding with the Mariana Islands Training and Testing (MITT) Environmental Impact Statement (EIS) review, places an undue burden on both reviewers and the CNMI community, who would benefit from an extended review period to ensure meaningful participation in both.</p>	<p>The USMC engaged in meaningful public participation consistent with NEPA requirements. The USMC conducted Revised Draft EIS public meetings in an open house format to encourage the sharing of information and discussion. Open house meetings provided increased flexibility for attendees, allowed for one-on-one interaction with experts and provided a casual atmosphere that encouraged more direct and comfortable participation and feedback. Each poster station presented the analysis of a key resource, and a representative was available to answer questions and direct the public to tables where individuals could submit written or oral comments. Public comments could be submitted in writing, by mail, on the website or through a court reporter at public meetings. Comments could be submitted in any language, and Chamorro and Carolinian translators were available at the public meetings.</p> <p>Chamorro and Carolinian version translations of the fact sheet were available at the public meetings and on the project website. The Executive Summary in these languages was also made available to download from the project website and printed copies were available for review at the local libraries on Tinian, Saipan, and Rota. Additionally, the USMC held office hours in August 2025 at the Commonwealth Bureau of Military Affairs Tinian Field Office to provide an opportunity for additional public engagement prior to the end of the public comment period.</p> <p>For the Revised Draft EIS public comment period, the USMC provided a 15-day extension for a total of 90 days. The USMC understands there are multiple government actions being conducted in the CNMI, and the DoD has staggered the release of Environmental Impact Statements to provide opportunities for public review and comment.</p>
37D	<p>Alternatives</p> <p>The analysis of alternatives does not sufficiently explore options for alternative infrastructure development and fails to address community scoping concerns related to sustainable land and water resource use.</p> <p>The DEIS fails to sufficiently justify the strategic necessity of concentrating large-scale, long-duration military training exercises within the limited land area of the Mariana Islands. Virtual training technologies which are already widely used by the DoD can be conducted anywhere and offer flexible, lower-impact alternatives to live exercises, especially in environmentally and culturally sensitive areas that are irreplaceable and sacred to Indigenous communities.</p> <p>Why would DoD refrain from using the Tinian Mortar range? Perhaps this is due to how the area surrounding Unai Chiget has already been so adversely impacted from previous exercises that no access has been granted to the general public until late 2022 when a narrow corridor was cleared of unexploded</p>	<p>In developing this Proposed Action, the USMC evaluated the changes in the way U.S. Armed Forces currently prepares for future conflicts and carefully considered the comments and suggestions submitted on the 2015 Draft EIS/OEIS by elected officials and government agencies of the CNMI, federal agencies, the public, and collaborative interagency coordination. The USMC’s proposed training concept for the Military Lease Area on Tinian recognizes the importance of minimizing the impacts of military training on the residents of Tinian reflects the terms of The Covenant, Technical Agreement and lease, which provides that the Military Lease Area, “may be used for any purpose required to carry out the defense responsibilities of the United States.” In addition, the training concept recognizes the importance of minimizing the impacts of military training on the residents of Tinian and would have the smallest practicable training footprint while meeting essential mission and safety objectives.</p> <p>The potential use of existing ranges on other islands and regions was considered but eliminated from detailed study because they did not meet the USMC’s readiness and</p>

<i>ID</i>	<i>Comment</i>	<i>Response to Comment</i>
	<p>ordnance (UXO). This beach area has unique cultural sites near the shoreline including ancient petroglyphs. Therefore, not only is it illogical to keep using this site as a mortar range, but there is also no logic that would support using other sites on such a small land mass for Mortar ranges or more firing ranges. No action is the only logical recourse. These exercises can be carried out in existing ranges in the area. New sites are not necessary for meeting DoD’s stated “need”. Please detail how the proposed range sites were identified and why existing and already impacted sites were not selected.</p> <p>The DEIS does not specify what specific training capabilities are lacking elsewhere, or why those capabilities cannot be developed, supplemented, or shared among existing sites. Indeed, upgrading existing training sites is much less costly than creating new sites.</p> <p>The DEIS does not provide a compelling or transparent rationale for the selection of Tinian over other available locations, such as Guam or other US installations, for large-scale military training activities.</p>	<p>accessibility requirements (see Section 2.4 of the Revised Draft EIS, Alternatives Considered but not Carried Forward for Analysis).</p> <p>See Section 2.1.5 (Training Infrastructure) of the Revised Draft EIS for a detailed discussion of the siting of facilities. The Revised Draft EIS (see Section 2.1.5.1, Multi-Purpose Maneuver Range and Section 2.1.5.2, Explosives Training Range) explained how proposed range locations were identified. Multiple sites within the Military Lease Area were screened using operational, safety, and environmental criteria—such as required surface danger zones, distance from populated areas, topography, existing infrastructure, and avoidance of sensitive cultural and biological resources.</p> <p>The former Tinian Mortar Range at Unai Chiget was not identified as a possible location because it no longer meets required safety buffer and access control criteria and has ongoing munitions response restrictions that preclude reuse for live-fire training. In contrast, the proposed Multi-Purpose Maneuver Range and Explosives Training Range are designed to consolidate activities within a managed area that provides improved safety controls and a reduced land footprint.</p>
37E	<p>Lacking Analysis and Methodology/General</p> <p>The DEIS does not provide a clear methodology demonstrating that the DoD conducted a thorough and scientifically rigorous evaluation before determining the significance of these impacts. As such, the analysis and the DoD’s conclusions appear anecdotal and lack defensible grounding in accepted scientific standards.</p>	<p>Consistent with requirements under NEPA, including case law, the Revised Draft EIS provided a comprehensive analysis of potential environmental impacts resulting from the Proposed Action based on best available science. The analysis also included a cumulative impact analysis (Section 4.15 of the Revised Draft EIS) for each resource.</p> <p>The USMC used best available science in its analysis, which included a qualitative and quantitative approach. Each resource section in Chapter 4 (Environmental Consequences) of the Revised Draft EIS included a subsection called “Approach to Analysis.” This subsection discussed how the analysis of potential impacts was considered. The public comment period allowed for input on the methodology, analysis, and conclusion of potential impacts. Significance determinations by the USMC represent a reasonable assessment of the relevant environmental impacts of the proposed action based upon the information presented.</p>

<i>ID</i>	<i>Comment</i>	<i>Response to Comment</i>
37F	<p>Lacking Analysis and Methodology/Impacts of Military Presence to Community and Tourism</p> <p>The DEIS lacks any discussion of acute or long term emotional and/or psychological trauma that may occur due to exposure to the presence of military personnel carrying weapons within the community, day and night live-fire, and explosions. This is not only true for the adult population, but more importantly for children during their early development.</p> <p>The DEIS does not adequately address the rationale for having service members carry weapons during non-live-fire training exercises, particularly in civilian-accessible areas.</p> <p>The DEIS must fully assess the sociocultural and economic impacts of this visible militarization of the island environment, particularly as it pertains to public perception, community well-being, and tourism-dependent businesses.</p>	<p>The Revised Draft EIS provided a comprehensive analysis of potential environmental impacts resulting from the Proposed Action based on best available science, including impacts to the human environment (see Chapter 4 for the impact analysis for each resource area such as Section 4.1, Public Access, Section 4.3, Socioeconomics, and Section 4.8, Noise, among others).</p> <p>The purpose of and need for the Proposed Action was described in Section 1.2 of the Revised Draft EIS. Training activities would occur only within the designated Military Lease Area, which was leased to the U.S. federal government consistent with the 1975 Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America (“the Covenant”), and Technical Agreement Regarding Use of the Land to be Leased by the United States in the Northern Mariana Islands (“Technical Agreement”), and associated lease, the first of which was signed in 1983. These agreements provide that the Military Lease Area, “may be used for any purpose required to carry out the defense responsibilities of the United States.” The U.S. military has regularly conducted military training activities within the Military Lease Area since that time, including those with the presence of weapons.</p>
37G	<p>Lacking Analysis and Methodology/Terrestrial Biology and Biosecurity</p> <p>Lastly, the exercises will result in environmental harm that is not sufficiently analyzed in the DEIS. Repeated disturbance of natural habitats could interfere with native wildlife mating patterns and migration cycles. Domesticated cattle, which are essential to the island’s local economy and cultural practices, are also likely to be adversely affected by noise and activity stressors.</p> <p>Figure 3.4-1 Plant Communities on Tinian (North) (Page 3-16 [of EIS]). This figure fails to include wetlands mapped and assessed by CNMI BECQ in the 2022 CNMI 305(b) and 303(d) Integrated Water Quality Assessment Report. These include Bateha 1 and 2, and the Mahalang complex. The report and analysis should be revised further to reflect all known and mapped environmentally sensitive areas.</p> <p>It is also apparent that the studies did not include fauna common to our islands. The DoD had a decade to perform similar studies on Tinian wildlife before releasing this DEIS for comment. Yet none were carried out. We respectfully request that the comment period be extended until such time that pertinent studies are completed so we will have something to review pertaining to our unique island ecosystems.</p> <p>This loss of important forested areas, in addition to destroying contiguous native canopy, allows the encroachment of invasive vines and other non-native species that will not be addressed by DoD’s biosecurity plans. This loss of natural forest</p>	<p>The potential impacts to wildlife and livestock from noise were analyzed in Section 4.4.3.1 (Terrestrial Plant Communities), Section 4.4.3.2 (Terrestrial Wildlife) and in Appendix J (Noise Study) of the Revised Draft EIS. Wildlife and livestock impacts would be minimized through buffers (e.g., aircraft overflights would be restricted to altitudes of no less than 1,000 feet over wetlands and limestone native forest), brief and intermittent exposures to impulsive sound levels above 90 decibels, and coordination of grazing; and residual effects would be less than significant.</p> <p>Wetland vegetation was displayed on Figure 3.4-1 of the Revised Draft EIS, along with other vegetation types, to show the extent of vegetation types on Tinian. The mapped boundaries of wetlands (i.e., those areas containing hydrophytic vegetation, wetland hydrology, and hydric soils) including Bateha 1 and 2, and the Mahalang complex, were discussed in detail in "Surface Waters and Wetlands" (Sections 3.14 and 4.14), and the boundaries of wetlands were depicted on Figures 3.14-1 and 4.14-1 of the Revised Draft EIS.</p> <p>The USMC used best available science to identify fauna found on Tinian and the Revised Draft EIS presented an accurate assessment of resources expected to be found on island. As stated in Section 4.4.1 (Biological Resources, Approach to Analysis) of the Revised Draft EIS, impacts to biological resources would be considered significant if they result in fragmentation or permanent loss of a terrestrial community that would alter the overall function of the community in the region. The Proposed Action has been designed such that it would not impact the three most sensitive and ecologically valuable terrestrial plant communities on Tinian: limestone coastal scrub, limestone</p>

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	<p>and clearing within the Conservation Area are significant impacts, particularly noting the relative scarcity of these areas on Tinian and throughout the CNMI.</p> <p>(Page 4-33 [of EIS]) “The proposed use of the mobile radar systems and surface radar towers would introduce the possibility of exposing bats and birds to radio frequency radiation, which is capable of heating organic tissues if exposed to radiation beams for long periods of time...” and “However, these surveillance systems produce radiation at extremely high frequencies (well above 116 megahertz) that are not likely to disturb wildlife.” Please cite studies that factually demonstrate that wildlife would not be disturbed. Simply stating it is “not likely” is unfounded and anecdotal at best.</p>	<p>native forest, and wetland. Based on the analysis, the USMC concluded that the reduction in vegetation from the Proposed Action would not represent a significant impact because it would not alter the overall function of the community in the region. As noted in Section 4.4.3.1 (Terrestrial Plant Communities) of the Revised Draft EIS, and further in Appendix D, the USMC would continue to comply with existing Joint Region Marianas biosecurity protocols to reduce the spread of non-native vegetation species. Appendix D included best management practices, standard operating procedures, and minimization measures that would be incorporated into the design of the action to avoid and/or minimize environmental impacts to resources, including, but not limited to, erosion control measures, implementation of the Integrated Natural Resources Management Plan, and implementation of a fire prevention and range wildland fire management plan.</p> <p>The USMC is consulting with the U.S. Fish and Wildlife Service through the Endangered Species Act Section 7 consultation process regarding impacts to Endangered Species Act listed species and their habitats. The consultation process will determine how to mitigate the loss of 19 acres of vegetation removal in the Natural Resources Conservation Area and 45 acres of secondary limestone forest in the Military Lease Area. Section 4.4.3.1 of the Final EIS has been updated to discuss potential mitigation for vegetation clearing includes proposed forest enhancement in the Pina Plateau region of Tinian. Mitigation plans would be finalized after completion of Endangered Species Act consultations and outlined in the EIS Record of Decision.</p> <p>Addressing the concern about frequency impacts, the following text has been added to Section 4.4.3.2 of the Final EIS: “Although frequent exposure to frequencies below 100 megahertz is known to negatively affect biological systems, there is no scientific evidence that infrequent exposure to radio frequencies above 100 megahertz have any adverse impacts on wildlife (Pophof et al. 2022).” As such, the conclusions of the EIS continue to be supported.</p>

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37H	<p>Lacking Analysis and Methodology/Solid Waste</p> <p>In addition to environmental concerns, the DEIS fails to address solid waste and recycling infrastructure impacts. The DoD has not clarified whether it will be responsible for removing recycled materials off-island to avoid overwhelming Tinian’s only recycling center. There is no indication in the DEIS of what recycling or solid waste management contracts are in place, or how waste will be managed during multi-week, large-scale exercises.</p> <p>In the interim, DoD has offered no completed management plan for where or how it will remove recycling or dispose of its solid waste.</p>	<p>Section 4.11.3.3 (Utilities, Solid Waste) of the Revised Draft EIS specifically outlined the options that would be utilized for management of solid waste generated by the Proposed Action based on the availability of local management options. These included: 1) transport CNMI Joint Military Training solid waste to Marpi Landfill on Saipan; 2) on-site incineration, which would reduce the amount of waste landfilled; or 3) transport the residual waste to one or more off-island facilities authorized to accept DoD waste for final disposal.</p> <p>DoD policies mandate the proper recycling and disposal of solid waste in accordance with the rules and regulations of the jurisdiction in which it operates. Section 4.11 (Utilities) of the Revised Draft EIS estimated quantities of solid waste to be generated and quantities of recyclables that are projected to be recovered.</p>
37I	<p>Lacking Analysis and Methodology/Wildland Fire</p> <p>It is deeply concerning that the DEIS has been released for public review and comment without a completed and publicly available Wildland Fire Management Plan. Given the known risk of wildland fires associated with live-fire training and other military activities, particularly in island environments with limited firefighting resources, the absence of this critical plan undermines the public’s ability to meaningfully evaluate the project’s environmental impacts.</p>	<p>Since publication of the Revised Draft EIS, additional information and analysis related to wildland fire conditions, risks, and management have been incorporated into Chapter 3 (Existing Environment) and Chapter 4 (Environmental Consequences) of the Final EIS. These revisions expand the discussion of wildfire occurrence on Tinian, existing fuel conditions, local fire response capabilities, and the mechanisms by which military training activities could introduce ignition sources. The Final EIS also includes an expanded evaluation of potential wildfire effects under the Proposed Action, including wildfire risk management measures, ignition prevention procedures, fuel reduction approaches, and response actions, as well as potential effects on public safety and biological resources.</p> <p>Consistent with NEPA, detailed operational or management plans are not required to be finalized prior to completion of an EIS, provided the EIS identifies the relevant risks and evaluates the reasonably foreseeable environmental effects associated with the Proposed Action. The Final EIS describes the overall wildfire management framework, objectives, and types of measures that would be implemented to reduce wildfire risk and evaluates potential wildfire impacts based on those elements.</p> <p>An Integrated Wildland Fire Management Plan is currently being developed and would be finalized prior to initiation of live-fire training activities. Implementation of the plan would be required as part of the Proposed Action and would provide site-specific procedures and coordination protocols consistent with the wildfire risk management framework evaluated in the Final EIS.</p> <p>With the additional analysis and clarifications provided in Chapters 3 and 4, the Final EIS provides sufficient information to inform the public and for the USMC to evaluate wildfire risks and the potential environmental effects associated with the Proposed Action.</p>

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37J	<p>Lacking Analysis and Methodology/Land Use, Public Access, Public Lands</p> <p>The CNMI community has experienced numerous notifications going out just days before planned activities, usually referencing coordinates that lay people are not familiar with, which does not provide sufficient time for the community to work around these disruptions to access. What actions will be taken to ensure the general public is well aware of access restrictions and in a timely manner?</p> <p>The DEIS states that under Alternative 1, the “entirety of the Military Lease Area would be used as a training area” and notes that under this alternative training would increase by 15%, but it is never well articulated what that means in terms of actual use and access. Prior references discuss environmentally and culturally sensitive areas where training would not occur, which seems to conflict with the statement that the “entire range” would be used for training. Is it all or some? This is an important point that should be clarified in the revised or supplemental EIS as this document remains inadequate to support meaningful public understanding let alone review of proposed actions.</p> <p>DoD has failed to consider compatibility and consistency with the CNMI Division of Public Lands Comprehensive Sustainable Development Public Land Use Plan mandated by Public Law 20-20, or any environmental restoration plans established by key Federal or CNMI environmental agencies. The United States Department of Agriculture (USDA), United States Fish and Wildlife Service (USFWS), and National Oceanic and Atmospheric Administration (NOAA) have several plans in place to protect CNMI resources, yet these were summarily dismissed from this analysis without explanation.</p> <p>The DEIS states “Non-live-fire training could occur throughout the Military Lease Area” but does not analyze what that means in terms of public access, land use, or recreation. Would non-live-fire training also prompt area closures?</p> <p>If the lease of the public lands on Saipan for the radio tower site is necessary to support proposed operations of this activity they should be assessed together. It is unclear how lease of additional (and very limited) public lands in CNMI for exclusive DoD use is consistent with the CNMI Covenant - which specified which lands would be leased in Section 802, with only Tanapag Harbor specified on Saipan, or the Public Land Use Plan referenced in this section.</p>	<p>As stated in Section 2.1.2 (Military Lease Area Training and Proposed Training Events) and Section 2.2.2 (Alternative 1) of the Revised Draft EIS, other than certain “no training areas,” the entire Military Lease Area is designated as a USMC Range Complex under the Proposed Action. Additionally, the Final EIS has been clarified in these sections that individual training events would only utilize locations in the Military Lease Area necessary to accomplish training events of that particular event. The Proposed Action would accommodate public access to the Military Lease Area and allow for flexibility in scheduling military training. To achieve this, the Military Lease Area would be divided into eight smaller, separate training areas that may be scheduled individually or several at a time. The public would be allowed access to those training areas not scheduled for military training when they can be safely accommodated. In fact, some training could be conducted without any controls on public access. However, during some training events, public access may be limited for the safety of the public and service members participating in the training. It is the intent of the USMC to allow, when possible, public access to recreational beaches, tourism areas, and North Field National Historic Landmark.</p> <p>The USMC solicited suggestions from the community on the best means of communicating with the fishing and boating community. Input included multilingual notices, physical posting of schedule and other pertinent information at marinas, and use of social media or radio.</p> <p>As described in Section 2.1.8 of the Revised Draft EIS, Range Control would continue to work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. Range Control would also work with the Municipality of Tinian to identify in advance any holidays, festivals, or other important days for which public access is needed. Range Control may adjust range operating strategies based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p> <p>Section 4.2 of the Revised Draft EIS (Land Use and Recreation) discussed the compatibility and consistency of the Proposed Action with existing land use plans. The Proposed Action was developed to ensure consistency with those and other relevant resource management plans. The Revised Draft EIS (see Section 2.1.5.1 Multi-Purpose Maneuver Range and Section 2.1.5.2 Explosives Training Range) explained how proposed range locations were identified. Multiple sites within the Military Lease Area were screened using operational, safety, and environmental criteria—such as required surface danger zones, distance from populated areas, topography, existing infrastructure, and avoidance of sensitive cultural and biological resources. Training would not take place in sensitive cultural or biological areas.</p>

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		<p>Consistent with Section 802 of the Covenant and the underlying lease for the Military Lease Area, the USMC is not seeking other property in the CNMI to conduct training but merely using land resources on Tinian that it already has under lease. The USMC is seeking to lease property on Saipan for communications purposes but not to acquire title to the property, which is also consistent with Section 806 of the Covenant.</p>
37K	<p><b>Lacking Analysis and Methodology/Economic Impact</b></p> <p>In this context, the claim of economic benefit appears both speculative and unsupported by specific analysis in the DEIS. A more balanced and comprehensive assessment is needed, one that considers not just the potential influx of military-related spending, but also the long-term economic losses associated with degraded tourism, decreased public confidence, and environmental degradation.</p> <p>Travel by boat and plane between Saipan and Tinian is already costly and challenging, and adding 2 to 4 mile diversions will have direct economic costs to air and boat travel that have not been well quantified or addressed. It is unclear how these impacts can be considered less than significant when the extent of the impact itself is not articulated. How will increased air and boat travel costs be mitigated?</p> <p>The DEIS should explicitly address these concerns by including an economic impact analysis that incorporates verified tax revenues, potential revenue gaps, and the implications for CNMI's fiscal health.</p> <p>A more rigorous assessment should include detailed modeling of net economic impacts, incorporate local business and community input, and weigh the military's economic footprint against the loss incurred in sectors foundational to Tinian's long-term sustainability and cultural identity.</p> <p>The document should analyze whether existing fire and emergency services have sufficient personnel, equipment, and funding to handle potential increases in incidents, especially considering that military training activities, including live-fire exercises, inherently increase risk levels.</p> <p>Dismissing noise, traffic, and visual disturbances as merely "localized" and "temporary" ignores the reality that a 10 to 15-year construction period is lengthy enough to cause significant and recurring disruptions, potentially deterring tourists and harming ranching and subsistence activities.</p> <p>Analysis in this section completely fails to consider the impacts of the proposed action on water and air travel for community members in the CNMI. Traveling to and from Tinian by boat or plane is already challenging, and the addition of</p>	<p>Section 4.3 of the Revised Draft EIS provided a thorough analysis of potential socioeconomic impacts of the Proposed Action. Land outside the Military Lease Area would remain under CNMI jurisdiction for planning and tourism development. The analysis did not identify significant, sustained adverse socioeconomic impacts.</p> <p>New employment opportunities and the acquisition of supplies required to operate and maintain the Military Lease Area Range Complex would provide a modest benefit to Tinian's economy. Spending would likely include payments to the Commonwealth Utilities Corporation for electrical and communications infrastructure, the purchase of fuel from local distributors for non-tactical vehicles, and local purchase of goods and supplies for vegetative control and other facilities maintenance-type activities. Additional consideration of long-term impacts to tourism, either positive or negative, and the reputation of Tinian is too speculative and cannot be assessed.</p> <p>As described in Section 4.3 of the Revised Draft EIS, there would be no impact to existing airspace or air travel resulting from the Proposed Action. Thus, no mitigation for flights associated with off island medical appointments is required. Impacts to fishing and boating were described in Section 4.1 (Public Access) in the Revised Draft EIS. As described in Sections 2.1.6 and 4.1 of the Revised Draft EIS, surface danger zones would be temporarily activated during scheduled live-fire events. These areas would not be permanently closed. Notification of surface danger zone activations would be made through the U.S. Coast Guard's Notice to Mariners system, along with other public communication channels. The USMC would continue to work with the CNMI government and Municipality of Tinian to determine the appropriate methods to ensure mariners, including subsistence and night fishermen, receive timely and effective information.</p> <p>The Proposed Action would accommodate public access to the Military Lease Area and allow for flexibility in scheduling military training. To achieve this, the Military Lease Area would be divided into eight smaller, separate training areas that may be scheduled individually or several at a time. The public would be allowed access to those training areas not scheduled for military training when they can be safely accommodated. In fact, some training could be conducted without any controls on public access. However, during some training events, public access may be limited for the safety of the public and service members participating in the training. It is the intent of the USMC to allow, when possible, public access to recreational beaches,</p>

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	<p>“danger zones” will likely have impacts that are most significant to lower income residents for whom an extra few miles of boat transit or a missed plane connection can have tremendous impacts. Additional analysis regarding vulnerable populations, including subsistence fishermen and the sailing community, should be provided here. To mitigate what will likely result in increased costs and less frequent flights, DoD should consider offering financial or logistical support to the CHCC for “medical referral” patients from Tinian who may be more likely to miss appointments or be unable to receive care when Range Control activities impact flight schedules between Saipan and Tinian airports.</p>	<p>tourism areas, and the North Field National Historic Landmark. Moreover, Range Control would continue to work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community will have advance notice of where, when, and how long training would occur. Range Control would also work with the Municipality of Tinian to identify in advance any holidays, festivals, or other important days for which public access is needed. In addition, Range Control may adjust range management strategies based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p> <p>In addition, Section 4.3.3.2 of the Revised Draft EIS stated, "Construction contractors would be expected to utilize local workers to the maximum extent practicable; use of non-immigrant foreign labor is generally not authorized unless efforts to recruit locally and in the U.S. are unsuccessful." The construction of training infrastructure would be sporadic and intermittent as funding is made available and is not expected to be full-time work over 10-15 years.</p> <p>With respect to the impact on fire and emergency services, Section 2.1.10 of the Revised Draft EIS noted that emergency services would initially be provided by the USMC. Over time, Joint Region Marianas and the USMC would work toward establishing agreements with the CNMI and/or Municipality of Tinian for the provision of fire and security services.</p> <p>The Final EIS has been updated to further describe existing fire and emergency response capabilities on Tinian in Chapter 3 (Existing Environment) and to evaluate wildland fire risk and response considerations in Chapter 4 (Environmental Consequences). The analysis in the Revised Draft EIS acknowledged that local fire and emergency response resources are limited and that Tinian does not have a DoD fire department.</p> <p>Chapter 4 of the Final EIS evaluates wildland fire risk in the context of the fire prevention and risk management measures incorporated into the Proposed Action (e.g., training restrictions during elevated fire danger conditions, fuel management, fire breaks, and rapid response procedures) to reduce ignition likelihood and limit fire growth. With implementation of these measures, the Final EIS concludes that the likelihood of increased demand on local fire and emergency services would be low.</p> <p>The USMC utilized best available science for all EIS environmental impact analysis and determinations of significance, including those related to impacts on noise, traffic, and visual resources. Please see Sections 4.6, 4.7, and 4.8 of the Revised Draft EIS.</p>

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37L	<p>Lacking Analysis and Methodology/Visual Resources</p> <p>First, the use of only five Key Observation Points from the originally identified seventeen viewpoints is overly narrow and may not adequately represent the diversity of experiences across the island. This reduction omits critical cultural, historical, and recreational areas that may have equal or greater visual sensitivity than those selected. The process does not explain the rationale for excluding the twelve other viewpoints or how public, Indigenous, or local stakeholder input informed their selection.</p> <p>Third, the analysis separates short-term construction impacts from long-term operational changes but fails to quantify or meaningfully analyze the cumulative visual degradation over the anticipated 10 to 15 years of continuous development. The impact of repeated, large-scale construction efforts, coupled with permanent range infrastructure and restricted public access, may fundamentally alter the visual character of the island over time, even if individual stages appear moderate in isolation.</p> <p>Lastly, the visual assessment appears to prioritize aesthetic disruption in terms of contrast and form but does not evaluate how these changes could affect the psychological, spiritual, or tourism-related experiences tied to iconic views like Mount Lasso or Ushi Point. The absence of a visual impact threshold based on community or cultural sensitivity weakens the integrity of the "less than significant" impact conclusion. Meaningful community outreach and consultation would enable a thorough analysis of these important — and potentially significant — impacts on both local residents and the tourists who remain vital to the economy.</p>	<p>Section 4.6.1 (Visual Resources, Approach to Analysis) in the Revised Draft EIS discussed the methodology of selecting the five Key Observation Points for visual simulation from the 17 viewpoints. The selected viewpoints and Key Observation Points represent views and scenic overlooks and well-known places and thoroughfares that people are accustomed to seeing as part of the Military Lease Area landscape. Significance determinations by the USMC represent a reasonable assessment of the visual impacts of the proposed action on the human environment based upon the information presented.</p> <p>CNMI government coordination is discussed in Section 1.4.2 (Revised Draft EIS and CNMI Coordination).</p> <p>Text has been added to Section 2.1.11 (Phased Implementation of Construction and Training) of the Final EIS to clarify that construction projects would occur intermittently over the 10 to 15-year timeframe, and would not occur continuously over that timeframe.</p>
37M	<p>Lacking Analysis and Methodology/Air Quality</p> <p>The use of emission factors derived from the US Virgin Islands as a proxy for the CNMI further compounds uncertainty, as differences in local meteorology, fuel types, and operational conditions may result in inaccurate emission estimates. ... The assumption that Easterly trade winds consistently transport pollutants away from populated areas is overly simplistic, ignoring possible seasonal or meteorological variations that could increase exposure risks. Crucially, the exclusion of quantitative air quality modeling for hazardous emissions from live-fire munitions and the proposed incinerator undermines the ability to evaluate potential localized “hot spots” of toxic pollutants.</p>	<p>The emission factor model used is the most recent planning tool developed by the EPA that incorporates comprehensive input into a database applicable to each state or county. The USMC used similar emissions factors from a comparable geographic and meteorological environment, consistent with best available science.</p> <p>The Revised Draft EIS addressed cumulative air emissions by conservatively combining the emissions from the year when the maximum construction activities would occur with the overlapping operational emissions as depicted in Section 4.9 (Air Quality), Tables 4.9-6 and 4.9-11 for Alternatives 1 and 2, respectively.</p>
37N	<p>Lacking Analysis and Methodology/Groundwater and Spill Control</p>	<p>A comprehensive hydrological study for the Proposed Action, called the Groundwater Modeling Technical Memorandum was included in Appendix M (Utility Studies) of</p>

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	<p>Applying the internationally accepted precautionary principle, no use of explosive ordnance should be permitted until a comprehensive hydrological study of Tinian’s aquifers, watersheds, and freshwater resources, including current and projected demands for all uses, is completed. In the absence of such a study, and without access to supporting analyses or data referenced in the DEIS, it is impossible to adequately assess the potential significance and scope of impacts to freshwater and coastal systems and related infrastructure based on the information provided.</p> <p>The DEIS lacks sufficient detail and analysis regarding the use, location, and management of temporary fuel containment systems proposed for training activities in the Northern Mariana Islands.</p> <p>Particularly noting the failure of monitoring and safety mechanisms in the wake of the recent Red Hill disaster on Oahu and noting any contamination of Tinian’s sole-source aquifer could significantly imperil the drinking water supply of residents and visitors alike. What avoidance, minimization, and mitigation measures will be implemented to ensure ground water supplies will not be impacted by this proposed use? Please detail what best management practices regarding fuel storage and monitoring will be put in place.</p> <p>No data is provided to support analysis regarding groundwater carrying capacity. What is the anticipated annual demand? What is the relative proportion to current and projected use for the residents of Tinian and its environmentally sensitive ecosystems?</p> <p>What monitoring and management measures will be implemented to ensure water quality exceedances do not occur due to these activities yet again?</p> <p>This creates a public sense of distrust in DoD’s capability to effectively oversee contractors and ensure that they comply with CNMI laws and regulatory requirements in the way of spill control plans, or responses to illicit discharges into the near shore or terrestrial environment. Please provide details of management plans already in place that will prevent further intentional discharges or mishaps, as plans are currently inaccessible from the DoD’s website links.</p> <p>Figure 3.13-1 includes a notation “Wells being investigated by Seabees for rehabilitation” – please clarify the graphic to depict which well(s) is identified and update narrative to discuss current use and availability of groundwater sources.</p> <p>Moreover, noting that CUC uses one sole source aquifer for Tinian’s municipal public water supply, analysis of the significance of proposed increases in water</p>	<p>the Revised Draft EIS. Section 4 of the study considered groundwater demand, including current and projected demands for all uses (related to the Proposed Action, other DoD, and non-DoD water demands) and sustainable yield of the basal aquifer. The modeling analysis included existing and potential future wells as well as drought scenarios. This study supported the determination that the Proposed Action would not result in significant impacts to groundwater (short- and long-term availability of water and groundwater quality), as described in Sections 4.11, 4.13, and 4.14 in the Revised Draft EIS (Utilities; Groundwater and Hydrology; and Surface Waters and Wetlands, respectively).</p> <p>The USMC would continue to coordinate with CNMI Bureau of Environmental and Coastal Quality on specific details such as permitting and the locations of wells. Annual CNMI Bureau of Environmental and Coastal Quality permitting requirements include reporting pumping volumes and water quality on a well-by-well basis. Based on this information, the Bureau of Environmental and Coastal Quality determines annually the allowable pumping volume for the following year.</p> <p>At the request of CNMI, the DoD would fund a one-time hydrogeological study to establish baseline data that could be used to support monitoring of Tinian’s aquifer. This study would consist of groundwater sampling at existing well locations, and laboratory testing of water samples. In addition, the DoD would install up to four groundwater monitoring wells at each of the two live-fire ranges, establish a water monitoring plan, and include one year of baseline monitoring before ranges would become operational. The locations of wells would be determined in collaboration with CNMI Bureau of Environmental Quality (refer to Table 2.3-1 of the Final EIS).</p> <p>As noted in Section 4.4 (Biological Resources) of the Revised Draft EIS, fueling of equipment would occur at least 120 feet away from water and preferably on an impervious surface. Additionally, Appendix C (Training and Construction Assumptions) noted the USMC would utilize existing fuel storage tanks and the existing secondary containment at the proposed Base Camp location. Upgrades and additional fuel tanks would also be constructed at this location. Fuel storage facilities would be constructed using best management practices and would also be located at least 500 feet from any surface water body and outside of inundation areas. Additional details on fuel storage and demand are provided in Appendix C (Training and Construction Assumptions).</p>

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	<p>extraction is incomplete without a full accounting of the water budget for current use and future trends.</p> <p>Please clarify, what is the current carrying capacity of Tinian’s sole freshwater lens, and how was this calculated? Please clearly specify assumptions and acknowledge data gaps if seepage rates or estimates for Tinian are not available. How was the “sustainable yield” of the sole source groundwater aquifer calculated? How will changes in land use, sea levels, and precipitation likely affect this calculation for the lifetime of this proposed action?</p>	
37O	<p>CNMI Climate Action Plan</p> <p>Noting that the CNMI has recently published a Climate Action Plan with commitments to reduce emissions at government facilities, it is inconsistent to write-off emissions associated with this proposal as “less than significant”.</p>	<p>As noted in Sections 4.9 (Air Quality) and 4.15.9 (Cumulative Impacts, Air Quality) of the Revised Draft EIS, while there is no statutory or regulatory threshold that defines when greenhouse gas emissions are “significant” for NEPA purposes, the effect from change in greenhouse gas emissions should be evaluated on a global scale as all cumulative emissions contribute to the overall atmospheric greenhouse gas burden.</p> <p>The Proposed Action would contribute directly to emissions of greenhouse gases from the combustion of fossil fuels during construction and training predominantly from mobile source combustion when training occurs. Compared to the No Action Alternative in future years, the Proposed Action would result in increased greenhouse gas emissions that could affect the CNMI’s efforts to achieve its long-term greenhouse gas emission reduction goals. However, as noted in Table 4.9-8 of the Final EIS, the increase in greenhouse gas emissions represents a less than 1% net increase in emissions as compared to U.S. Territory greenhouse gas emission inventories. Accordingly, the Revised Draft EIS concluded that the net increase in greenhouse gas emissions from the Proposed Action would not be significant.</p>
37P	<p>Military Buildup</p> <p>Importantly, concentrating extensive military activity on an island with a small land mass and relatively remote location raises serious security concerns. Such a build-up may inadvertently make the Marianas a high-value target for foreign adversaries in the event of rising tensions or conflict. The DEIS should address this vulnerability. Included in the assessment of the vulnerability should be plans to support civilian protection/shelter in the event of a strike to the islands.</p>	<p>The environmental impact associated with national security concerns and the possibility of effects on CNMI are speculative and not reasonably foreseeable. The range of factors required to perform such an analysis are dependent on security considerations that relate to U.S. government policy and are beyond the scope of this Proposed Action.</p>
37Q	<p>AM2 Matting</p> <p>For the purpose of assessing environmental impacts, it would seem relevant to note what type of nonskid coating would be used on the AM2 matting surface. It appears that epoxy is the traditional coating, and if this is the material being proposed here, this may raise additional concerns regarding maintenance</p>	<p>All materials and equipment used in the proposed action would be procured and managed in accordance with applicable DoD specifications and federal and CNMI requirements. Use, maintenance, and disposition would be implemented under established DoD procedures and, where applicable, manufacturer guidance.</p>

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	<p>especially in our hot, corrosive environment. Even under normal conditions, these AM2 matting must be removed and resurfaced which can have environmental impacts which are not accessed. It also appears other more environmentally friendly coatings as well as other materials such as lightweight magnesium alloys and phase-transforming cellular materials, are available. These are increasingly considered industry standards that potentially offer lighter and more sustainable alternatives to the current AM2 material. Please explain why AM2 was selected, what type of coatings are proposed, the frequency of maintenance, and the associated waste disposal and resource demands.</p>	<p>AM2 matting was used in the Revised Draft EIS as a representative, currently fielded expeditionary surfacing system with established DoD specifications and performance data. The Revised Draft EIS did not select a specific proprietary nonskid coating; those decisions (including exact coating type, maintenance methods, and vendors) would be made during later design and procurement and would be required to comply with all applicable DoD, federal, and CNMI environmental and hazardous waste management requirements.</p> <p>Routine inspection, repair, and occasional panel replacement are anticipated for any expeditionary matting system in a hot, corrosive environment. Any associated waste streams would be appropriately managed in accordance with established procedures and waste management plan.</p>
37R	<p>Range Contamination and UXO</p> <p>Even limited usage of live-fire training conducted at any 24-hour period by 1,000 soldiers would wreak major havoc not only on the endangered species but the people of Tinian and Saipan. It is unclear how these activities will be managed to avoid impacts to residents and tourists, let alone how ranges which may be used 24/7 could be cleared of munitions and related debris from these activities.</p> <p>Furthermore, the assumption that munitions entering coastal waters pose negligible risk is speculative and unsupported by site-specific impact modeling. Submerged cultural resources and sensitive marine ecosystems could still be at risk from metallic debris, chemical contamination, and physical disturbance, particularly over the long term. The DEIS does not adequately evaluate these risks, nor does it propose any monitoring or mitigation measures for underwater impacts.</p>	<p>Please see Section 2.1.2 of the Revised Draft EIS for a thorough description of proposed training on Tinian. Impacts to the public from range operations were thoroughly discussed in Section 4.1 (Public Access) and 4.10 (Public Health and Safety) of the Revised Draft EIS.</p> <p>The analysis presented in the Section 106 consultation and the Revised Draft EIS accounts for cumulative and indirect effects to historic properties, including known Traditional Cultural Properties and submerged resources. The proposed Explosive Training Range is located approximately 1,765 meters (5,790 feet) from the closest Traditional Cultural Property while the Multi-Purpose Maneuver Range is located 3,280 meters (10,770 feet) from the closest Traditional Cultural Property. Effects from noise on Traditional Cultural Properties were discussed in Section 4.5 of the Revised Draft EIS. The USMC has concluded that live-fire ranges would not affect known Traditional Cultural Properties.</p> <p>Regarding munitions in the offshore surface danger zones, as noted in Section 4.4.3.4 of the Revised Draft EIS, all proposed training activities would be conducted entirely on land. However, portions of the designated surface danger zone associated with the Multi-Purpose Maneuver Range would extend over adjacent coastal waters. USMC ranges are intentionally designed to minimize the likelihood of projectiles leaving the primary target area. Data from operational assessments and range clearance programs consistently show that nearly all projectiles remain within the land-based portion of the target area. This high level of containment is the result of several safety and design measures: all weapons and ammunition used meet strict DoD standards for performance and accuracy; every operator is certified on their weapon; the firing positions and target locations are arranged to ensure rounds remain within the intended land area; and targets are constructed with materials that help reduce the chance of ricochets.</p>

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		<p>Other factors that would limit the probability of a projectile entering coastal waters would include the native vegetation surrounding the range which would act as a natural buffer, further slowing or stopping projectiles before they could reach coastal waters, and the undulating terrain of the range that would likely stop or slow down ricocheting projectiles. In the event of a ricochet, a projectile would rapidly lose speed due to air resistance, significantly reducing its potential to travel beyond the range boundary.</p> <p>On rare occasions, a projectile from the Multi-Purpose Maneuver Range may travel outside the target area but still land within the surface danger zone. In the unlikely event that a projectile enters coastal waters, the risk to cultural resources would be very low. Once a projectile enters the water, it rapidly loses energy and moves quickly through the water column to settle on the sea floor. The probability of submerged cultural resources being impacted on the ocean floor by any errant small arms munitions within a surface danger zone area approximately 4,430 hectares (11,000 acres) is almost non-existent and thus discountable.</p>
37S	<p>Noise</p> <p>The proposed month-long training exercises, conducted two to four times per year, involving up to 1,000 service members and multiple armed forces branches, is excessive in both scale and frequency. Such sustained military activity, especially when conducted at night, poses serious risks to the mental and emotional health of Tinian residents. Sleep disruption caused by nighttime operations would particularly impact vulnerable populations, including school children, adolescents, the elderly, and individuals suffering from post-traumatic stress disorder (PTSD), many of whom are the islands' military veterans.</p> <p>Residents and tourists on Saipan, especially in the South will also be impacted by aircraft noise and visibility of operations, which may affect both the tourism industry and public perception of regional stability.</p> <p>Tinian is a small island, and the sound and vibration from explosive detonations will not remain confined to the designated training area. These disturbances are likely to be experienced across the island and even in parts of neighboring Saipan. Such impacts pose a serious threat to the physical and psychological well-being of residents, including children, elders, and individuals with PTSD, many of whom are veterans. The persistent presence of explosions and military activity will also affect native wildlife and endangered species, which are highly sensitive to noise and habitat disruption, an issue insufficiently explored in the DEIS.</p>	<p>Potential noise impacts on the civilian population were analyzed in Section 4.8 (Noise) of the Revised Draft EIS and Appendix J (Noise Study). Additional analysis on the effects of noise on specific resource areas was presented in their respective sections of the Revised Draft EIS. Potential effects to land use was discussed in Section 4.2, socioeconomic-related impacts on domesticated animals in Section 4.3, wildlife in Section 4.4, and cultural resources in Section 4.5.</p> <p>The potential noise generated during ground and aviation training events was modeled by the USMC using noise modeling software approved for DoD use. Furthermore, the methodology and metrics used for evaluating potential noise impacts associated with the Proposed Action were developed based on guidance from the Department of Defense Noise Working Group. The results of this modeling effort show that new sources of noise would occasionally be audible beyond the Military Lease Area during some training events (e.g., at residential, education, or commercial areas in San Jose or the southern tip of Saipan), primarily from live-fire training at the Multi-Purpose Maneuver Range and Explosives Training Range and from use of different types of aircraft at North Field and proposed Landing Zones. Noise from training would be temporary, occur intermittently over the course of any given year, and be interspersed with quieter times where less noise-producing activities or even no military training would be audible. Effects may vary over time, however, based on environmental factors and individual sensitivity to noise (i.e., under changing weather conditions), it is possible a sound source may be barely detectable one day, but very loud and annoying the next.</p>

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	<p>Overall, the DEIS analysis does not account for or assess additional impacts from significant increases in air traffic including analysis of the extent of low or high altitude sonic booms on receiving populations which include humans, marine and terrestrial species (many of which are listed as endangered) or domestic livestock and other animals.</p> <p>There is no mention in this section how noise and general war game exercises will impact the local community’s peace of mind, children’s physical and mental health (Santa Barbara J. Impact of war on children and imperative to end war. <i>Croat Med J.</i> 2006 Dec;47(6):891-4. PMID: 17167852; PMCID: PMC2080482., (<a href="https://pubmed.ncbi.nlm.nih.gov/articles/PMC2080482/#:~:text=Croat%20Med%20J,6%3A891%E2%80%93894">https://pubmed.ncbi.nlm.nih.gov/articles/PMC2080482/#:~:text=Croat%20Med%20J,6%3A891%E2%80%93894</a>), and cognitive and social-emotional development and wellbeing, residents sleep patterns, and a general increase in anxiety for those that suffer from PTSD, especially our many veterans on islands.</p> <p>We recommend that until a scientific study on the impacts of noise on humans and animals from the last decade of <i>military exercises on Tinian</i> be completed and shared with the general public through the CNMI’s Bureau of Military Affairs or any other broad public news outlet, that the ‘No Action’ Alternative be chosen. Without a valid study looking at this unique demographic and its denizens it is the only defensible alternative to be taken.</p> <p>This conclusion does not include any data on noise impacts to the public or fauna over time. These exercises are not temporary, as proposed they are ongoing. DoD failed to conduct any studies over the past decade of ongoing exercises on the human population. This shows a lack of diligence on the part of DoD and the authors of this DEIS.</p> <p>No analysis has been provided on the physical and psychological impacts of noise created by these exercises on the population’s state of mind, especially those highly susceptible to trauma, veterans, and children during their developmental stages of growth. Military planes flying overhead, the presence of guns, and live-fire is jolting even to those not having experienced previous trauma. This lack of study is indefensible given that DoD is basing their chosen alternative on noise in decibels and not on the overall experience of ongoing exposure.</p> <p>(Page 4-96 [of the EIS]) “Thus, aircraft training under Alternative 2 would be likely to produce annoyance and not expected to result in interruptions to conversations or indoor speech, or classroom learning on Tinian or Saipan.”</p>	<p>The analysis found training-related noise may cause effects such as annoyance, but would be unlikely to interrupt conversations, cause classroom learning interference, or disrupt sleep.</p> <p>The Proposed Action described in the Revised Draft EIS would not involve low- or high-altitude sonic boom generation.</p>

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	DoD has provided no data to support the assumption that conversations, or classroom learning would not be impacted. This conclusion is indefensible.	
37T	<p>Lacking Analysis and Methodology/Cultural Resources</p> <p>This analysis presents a fragmented and inadequate treatment of cultural resource impacts, relying on procedural distinctions between NEPA and the National Historic Preservation Act (NHPA) to downplay the severity of harm to Indigenous communities and their ancestral lands. While the analysis acknowledges that some cultural resources such as cemeteries, memorials, and medicinal plant gathering areas, may not be eligible for the National Register of Historic Places (NRHP), it fails to explain how these resources will be meaningfully protected or incorporated into the decision-making process. This effectively relegates sacred and culturally significant Indigenous sites to a lower tier of concern. The suggestion that adverse effects under NHPA do not necessarily constitute “significant impacts” under NEPA reflects a regulatory loophole that allows the federal government to dismiss or minimize cultural harms that are deeply consequential for Indigenous communities. Such an approach is incompatible with the federal trust responsibility and with the principles of Free, Prior, and Informed Consent (FPIC) outlined in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), which the United States has endorsed.</p> <p>The lack of discussion around meaningful consultation or indigenous-led evaluations of significance suggests that the process is being carried out in a top-down, extractive manner, rather than through collaborative, government-to-government consultation as required under Section 106.</p> <p>The proposed mitigation measures: interpretive signage, virtual tours, pamphlets on Chamorro history, and an interpretive center are not sufficient to address significant and potentially irreversible adverse effects on the cultural and historical landscape of Tinian, particularly regarding the North Field National Historic Landmark, and associated Chamorro and Refaluwasch (Carolinian) heritage sites. While these measures provide interpretive and educational value, they fall short of the federal requirement to prioritize avoidance and preservation in place, which is clearly articulated as the preferred treatment under Section 106 of the NHPA.</p> <p>Second, while the viewshed analysis incorporates basic geographic variables (elevation, vegetation, etc.), it does not appear to integrate cultural landscapes or Indigenous visual perspectives, which are critical to understanding how land, seascape, and sky are perceived in a place-based context. For example, many</p>	<p>In compliance with NEPA and the National Historic Preservation Act, the Revised Draft EIS analyzed impacts and effects on cultural resources, to include historic properties in Section 4.5. Both NEPA and the Section 106 process of the National Historic Preservation Act include opportunities for the public, interested parties and members of the community, including those of Chamorro and Carolinian descent, to identify cultural resources to include historic properties and potential effects as well as comment on the assessment of effects and proposed mitigation. The Section 106 consultation was conducted in good faith with the CNMI Historic Preservation Office, the Advisory Council on Historic Preservation, the National Parks Service, and the Municipality of Tinian and the public.</p> <p>The Section 106 process is consistent with the intent of the United Nations Declaration on the Rights of Indigenous Peoples. The USMC consulted early to provide the opportunity to identify and resolve issues, including potential adverse effects to historic properties.</p> <p>Consistent with the National Historic Preservation Act, the Proposed Action would minimize adverse effects to historic properties. Likewise, under NEPA there would be less than significant impacts to cultural resources to include Traditional Cultural Properties and places of cultural importance. Cultural resources were also discussed in Public Access (Sections 3.1 and 4.1), Biological Resources (Sections 3.4 and 4.4), and Socioeconomics (Sections 3.3 and 4.3).</p> <p>Where avoidance or minimization of effects cannot be avoided, mitigation resolves adverse effects, pursuant to 36 CFR 800.6(a). In support of the Proposed Action, mitigation was developed in consultation with consulting parties (as outlined in Appendix H, Cultural Resources Supporting Information of the Revised Draft EIS).</p> <p>In reference to the comment about the viewshed analysis, impacts to visual resources were analyzed in Section 4.7 of the Revised Draft EIS. Please also see the response above to 37L.</p>

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	<p>sacred and culturally significant sites on Tinian—such as coastal cliffs, caves, and ancestral paths—may not be visually prominent in a western scenic framework, but still hold deep meaning that would be disrupted by militarized alterations to the horizon, vegetation, or soundscape.</p>	
39A	<p>I write as the newly sworn-in Governor of the Commonwealth of the Northern Mariana Islands (CNMI) to respectfully request an extension of the public comment deadline for the Revised Draft Environmental Impact Statement (RDEIS) for the CNMI Joint Military Training (CJMT), currently due on August 20, 2025. As you are aware, I assumed office on July 24, 2025, following the tragic and unexpected passing of Governor Arnold I. Palacios. This abrupt transition of leadership has required my administration to focus on ensuring government continuity while honoring the legacy of our late Governor.</p> <p>Given the importance and complexity of the proposed CJMT project - particularly its implications for land use, environmental stewardship, cultural preservation, public access, and our limited natural resources - my administration needs additional time to thoroughly review the Revised Draft EIS and meaningfully consult with local stakeholders, agencies, and affected communities. The Revised Draft EIS reflects significant changes from the original 2015 proposal, including modifications to training locations, infrastructure, and environmental safeguards. Despite the U.S. Marine Corps' efforts at interagency consultation and public outreach, this is the first opportunity for the CNMI's newly constituted executive leadership to formally review and respond to the full scope of the proposed action.</p> <p>Accordingly, we request an extension of at least 60 days, until October 21, 2025, to allow for a responsible and well-informed review of the RDEIS. This extension would uphold the spirit and intent of the National Environmental Policy Act (NEPA), ensuring that potentially significant environmental and social impacts are properly assessed in coordination with local leadership and the public.</p>	<p>For the Revised Draft EIS public comment period, the USMC provided a 15-day extension for a total of 90 days.</p>

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41A	<p>The Commonwealth of the Northern Mariana Islands (CNMI) Comprehensive Sustainable Development Plan (CSDP) outlines a vision for long-term, community-centered development rooted in balanced economic growth, environmental stewardship, cultural preservation, and equitable land use.</p> <p>Upon critical review of the Revised Draft Environmental Impact Statement (RDEIS) for the CNMI Joint Military Training (CJMT), we find that the proposed military activities under Alternatives 1 and 2 are fundamentally misaligned with the CSDP’s goals.</p> <p>The RDEIS presents a range of direct and indirect impacts that compromise CNMI’s environmental sustainability, cultural heritage, economic independence, public access rights, and climate resilience. This submission outlines these areas of conflict and proposes recommendations to realign federal actions with the sustainable future envisioned by the people of the CNMI.</p>	<p>Training activities would occur only within the designated Military Lease Area, which was leased to the U.S. federal government consistent with the 1975 Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America (“the Covenant”), and Technical Agreement Regarding Use of the Land to be Leased by the United States in the Northern Mariana Islands (“Technical Agreement”), and associated lease, the first of which was signed in 1983. These agreements provide that the Military Lease Area, “may be used for any purpose required to carry out the defense responsibilities of the United States.” The U.S. military has regularly conducted military training activities within the Military Lease Area since that time. The proposed live-fire ranges have been located specifically to minimize potential noise and other impacts of military populations on the local residential populations of Tinian and Saipan.</p> <p>The Comprehensive Sustainable Development Plan does not contain specific land use recommendations or requirements for the Military Lease Area. As such, the Revised Draft EIS did not evaluate compatibility and consistency with this plan as part of the evaluation of land use effects. The plan was considered for compliance with utilities and other resources.</p>
41B	<p>1. Environmental Stewardship</p> <p>CSDP Goal: Sustainably manage ecosystems, biodiversity, and land/water resources.</p> <p>CJMT Conflicts:</p> <ul style="list-style-type: none"> <li>• Significant land clearing for training infrastructure and range development within or adjacent to conservation areas (Section 4.2; Figures 4.2-2, 4.2-3).</li> <li>• Impacts to endangered species such as the Mariana fruit bat and green sea turtles due to live-fire training and habitat disruption (Section 4.4; Tables 4.4-2, 4.4-5).</li> <li>• Increased air emissions, noise pollution, and risk of erosion from explosives and vehicle activity (Section 4.8, 4.9, 4.12).</li> </ul> <p>Conclusion: These actions violate the CSDP’s commitment to environmental resilience and threaten both terrestrial and marine ecosystems.</p>	<p>The Proposed Action has been designed in such a way that its elements would avoid as much high-quality habitat as possible, with the majority of construction and training occurring in areas dominated by invasive plant species or areas that are already cleared. Additionally, the USMC is consulting with the U.S. Fish and Wildlife Service and the National Marine Fisheries Service, under Section 7 of the Endangered Species Act, to ensure compliance with federal law. These consultations will be complete and incorporated, as appropriate, into the Record of Decision.</p> <p>Impacts from air emissions, noise pollution, and erosion from explosives and vehicle activity would be less than significant and are not expected to threaten terrestrial or marine biological resources. For further information, see Sections 4.8.3 (Noise), 4.9.3 (Air Quality), and 4.12.3 (Topography, Geology, and Soils) of the Revised Draft EIS.</p>

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41C	<p>2. Cultural Preservation</p> <p>CSDP Goal: Protect sacred sites, historical landmarks, and indigenous cultural practices.</p> <p>CJMT Conflicts:</p> <ul style="list-style-type: none"> <li>• Restricted or delayed access to sacred sites such as Puntan Taddong and foraging zones during training periods (Section 4.1.3.1; Section 4.5).</li> <li>• Degradation of the visitor experience at historical sites like the North Field National Historic Landmark due to noise and military presence (Section 4.6).</li> </ul> <p>Conclusion: The current mitigation measures are insufficient to safeguard cultural continuity and violate the spirit of community self-determination and heritage protection.</p>	<p>In compliance with NEPA and the National Historic Preservation Act, the Revised Draft EIS analyzed impacts and effects on cultural resources, to include historic properties in Section 4.5. Proposed training locations were sited specifically to avoid cultural resources where possible. Pursuant to the Section 106 process, potential effects to historic properties were discussed with the public, interested parties and members of the community, including those of Chamorro and Carolinian descent. In those engagements, effects on cultural resources and historic properties, as well as potential mitigations were discussed. Consistent with the National Historic Preservation Act, the Proposed Action would minimize adverse effects to historic properties. Likewise, under NEPA there would be less than significant impacts to cultural resources to include Traditional Cultural Properties and places of cultural importance.</p> <p>Public access was analyzed in Section 4.1 of the Revised Draft EIS. The Proposed Action would accommodate public access to the Military Lease Area with eight smaller training areas (Figure 2.1-2) to allow Range Control to designate selective closures to safely accommodate both training and public access. Access restrictions for public safety would be intermittent and would minimize access disruptions to recreational beaches, tourism areas, and the North Field National Historic Landmark and places of cultural importance.</p> <p>As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. Range Control would also work with the Municipality of Tinian to identify in advance any holidays, festivals, or other important days for which public access is needed. Range Control may adjust range operating procedures for communication based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p> <p>See Section 4.8 (Noise) of the Revised Draft EIS for a discussion of impacts from noise.</p>

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41D	<p>4. Public Access and Equity</p> <p>CSDP Goal: Ensure fair and inclusive access to public lands.</p> <p>CJMT Conflicts:</p> <ul style="list-style-type: none"> <li>• Entire Military Lease Area becomes intermittently inaccessible to the public, undermining civil land use rights (Section 4.1).</li> <li>• Access to recreation, memorials, and cultural resources dictated by military training schedules, not community needs.</li> </ul> <p>Conclusion: The militarization of public lands without enforceable community protections creates structural inequity and contradicts CNMI's land justice principles.</p>	<p>The Proposed Action would accommodate public access to the Military Lease Area and allow for flexibility in scheduling military training. To achieve this, the Military Lease Area would be divided into eight smaller, separate training areas that may be scheduled individually or several at a time. The public would be allowed access to those training areas not scheduled for military training when they can be safely accommodated. In fact, some training could be conducted without any controls on public access. However, during some training events, public access may be limited for the safety of the public and service members participating in the training. It is the intent of the USMC to allow, when possible, public access to recreational beaches, tourism areas, and the North Field National Historic Landmark. Moreover, the USMC would continue to work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. Range Control would work with the Municipality of Tinian to identify in advance any holidays, festivals, or other important days for which public access is needed. Range Control may adjust range management strategies based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p>
41E	<p>5. Climate Resilience and Infrastructure Sustainability</p> <p>CSDP Goal: Advance infrastructure that enhances climate resilience and conserves natural resources.</p> <p>CJMT Conflicts:</p> <ul style="list-style-type: none"> <li>• Construction and training increase GHG emissions and place additional pressure on CNMI's water supply systems (Section 4.9, 4.11, 4.13).</li> <li>• Potential for land disturbance and erosion in fragile karst environments (Section 4.12).</li> </ul> <p>Conclusion: The project undercuts CNMI's climate adaptation priorities and weakens its long-term environmental stability.</p>	<p>The USMC conducted a comprehensive analysis of potential environmental impacts of proposed training and construction on Tinian. The Proposed Action includes the reuse of existing structures at the U.S. Agency for Global Media for an expeditionary Base Camp instead of constructing a new facility on Tinian. The proposed live-fire ranges would encompass about 203 acres of new construction in previously undisturbed areas, which is only about 1.3 percent of the Military Lease Area. Other infrastructure, including the proposed Landing Zones and drop zone would only involve managing the height of vegetation. Biosecurity facilities at the Port of Tinian and an aircraft shelter within the U.S. Air Force Divert lease area on Tinian International Airport would be located on previously disturbed areas. Thus, the USMC concluded that proposed training and construction would not significantly impact CNMI's climate adaptation priorities or weaken its long-term environmental stability.</p>
42A	<p>Comment 1 – Invasive Species Risk Not Adequately Addressed</p> <p>Reference: Volume IIa, Appendix A-H, Table H-6, page H-25</p> <p>The EIS mentions that a "biosecurity facility" is included as part of the Port of Tinian build-up to support inspections of incoming cargo. However, there is no detail provided on how this facility will be operated, staffed, or equipped to prevent the introduction of invasive species, which are a significant threat to CNMI ecosystems and agriculture.</p>	<p>As noted in Section 2.1.9.2 and Section 4.4.3.1 (Terrestrial Plant Communities) of the Revised Draft EIS and further in Appendix D, the USMC would continue to comply with existing Joint Region Marianas biosecurity protocols to reduce the spread of non-native vegetation species. Appendix D included best management practices, standard operating procedures, and minimization measures that would be incorporated into the design of the action to avoid and/or minimize environmental impacts to resources, including, but not limited to, erosion control measures, implementation of the Integrated Natural Resources Management Plan, and implementation of a fire prevention and wildland fire management plan.</p>

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	<p>The Final EIS should include a comprehensive Biosecurity Management Plan, developed in coordination with CNMI biosecurity agencies, and must detail:</p> <ul style="list-style-type: none"> <li>• Inspection and decontamination protocols</li> <li>• Pre-departure inspection requirements from ports of origin</li> <li>• Ongoing surveillance and early detection measures for high-risk species like Coconut Rhinoceros Beetle, Little Fire Ant, and Mucuna pruriens</li> </ul> <p>Comment 2 – Coordination with CNMI Biosecurity Authorities Is Not Evident</p> <p>Reference: There is no substantive mention or commitment in the EIS to formal coordination or agreements with the Division of Customs and Biosecurity or the CNMI Invasive Species Council.</p> <p>While the document references consultations with various stakeholders, it fails to identify any direct or formal collaboration with CNMI’s lead biosecurity agencies responsible for regulating and managing invasive species threats.</p> <p>DOD must establish an MOU or similar agreement with CNMI Customs &amp; Biosecurity and the CISC, outlining shared responsibilities, data-sharing protocols, incident reporting, and enforcement authority throughout all phases of CJMT activities.</p> <p>Comment 3 – Biosecurity Infrastructure Lacks Detail</p> <p>Reference: The EIS states that the Port of Tinian will include a “biosecurity facility” to support the increased volume of military cargo and personnel, but it does not specify:</p> <ul style="list-style-type: none"> <li>• What inspections will be performed</li> <li>• Who will be responsible for oversight</li> <li>• Whether the facility will meet USDA or CNMI quarantine standards</li> </ul> <p>The Final EIS must include operational specifications for this facility, such as:</p> <ul style="list-style-type: none"> <li>• Defined inspection zones</li> <li>• Biosecurity waste disposal systems</li> <li>• Fumigation or heat treatment capacity</li> <li>• Compliance with CNMI Customs quarantine requirements</li> </ul> <p>Comment 5 – Increased Transport Operations Pose Biosecurity Risks</p> <p>Reference: Appendix H identifies increased freight movement to Tinian via barge and airlift, including construction materials, fuel, and equipment.</p>	<p>The USMC is consulting with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act regarding potential impacts to listed species, including potential impacts from invasive species and vessel movements. The consultation will be complete and incorporated, as appropriate, into the Record of Decision. Biosecurity protocols would be updated if required by the consultation process and coordinated with CNMI Customs and Biosecurity. Vessel movements, including management and cleaning, would comply with applicable federal regulations. It is also important to note the USMC is proposing to build a new brown tree snake barrier and wash rack facility at the port to improve biosecurity infrastructure on Tinian.</p>

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	<p>However, there is no mention of marine invasive species management, ballast water protocols, or hull biofouling inspections.</p> <p>The Final EIS must outline:</p> <ul style="list-style-type: none"> <li>• Ballast water management protocols to prevent marine invasive introductions</li> <li>• Hull inspection and cleaning requirements for all vessels before port entry</li> <li>• Cargo certification policies that align with CNMI’s invasive species regulations</li> </ul> <p>Comment 6 – Cumulative Impact on CNMI Biosecurity Capacity Is Not Addressed</p> <p>Reference: The EIS asserts that cumulative environmental impacts will be “less than significant” but does not analyze how sustained increases in inspection demand, waste management, or emergency response will affect CNMI’s limited biosecurity workforce and budget capacity.</p> <p>The Final EIS should include:</p> <ul style="list-style-type: none"> <li>• An impact analysis on CNMI biosecurity infrastructure</li> <li>• Funding commitments or technical assistance to support local agency staffing, equipment, and training</li> <li>• A cost-share strategy for expanding CNMI’s invasive species detection and rapid response systems</li> </ul>	
42B	<p>Comment 4 – Sensitive Habitat Areas Threatened by Training Activity</p> <p>Reference: Chapter 3 (Section 3.4), page 3-21, confirms that Lake Hagoi is a critical habitat for the Mariana Common Moorhen and is located within the Military Lease Area. Chapter 4 also mentions the Natural Resources Conservation Area (936 acres), which allows “low-impact” training but lacks clarity on enforcement.</p> <p>While Lake Hagoi is “currently restricted from training activities,” no permanent restriction is codified in the EIS. Additionally, the impacts of aircraft overflight, noise, and potential runoff into sensitive areas are not adequately addressed.</p> <p>We request:</p> <ul style="list-style-type: none"> <li>• Legally enforceable training exclusion zones around Lake Hagoi and the Conservation Area</li> <li>• Seasonal restrictions during nesting or breeding periods</li> </ul>	<p>Figure 4.4-1 in the Revised Draft EIS displayed the existing restricted area around Lake Hagoi; Figure 4.4-4 displayed the proposed restricted area near Pina Plateau. Section 5.1.2 of the Revised Draft EIS details the 1999 Conservation Agreement and allowable uses in the Natural Resource Conservation Area. As noted in Section 4.4.3.3 (Terrestrial Special Status Species) of the Revised Draft EIS, aircraft must stay above 1,000 feet above wetlands and other sensitive habitats.</p> <p>In addition, Appendix D (Best Management Practices) of the Revised Draft EIS stated that. “...the Integrated Natural Resources Management Plan would be updated with additional management tools developed in coordination with cooperating agencies to protect native vegetation on Tinian.”</p> <p>The USMC is consulting with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act. The consultation will be complete and incorporated, as appropriate, into the Record of Decision.</p>

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	<ul style="list-style-type: none"> <li>Required coordination with CNMI Division of Fish and Wildlife for monitoring</li> </ul>	
43A	<p><u>RDEIS Section 3.6 – Visual Resources</u></p> <p>The NPS provides some corrections to the captions for Viewpoints 1 and 4 in Table 3.6-1 “Description of Existing Tinian Views.”</p> <ul style="list-style-type: none"> <li>Viewpoint 1 (pg. 3-48) depicts the Japanese Air Apron (camera facing south), not the Atomic Bomb Loading Apron and Loading Pits as stated in the second part of the caption. We provide here an accurate description of the condition of the resource. The Tinian North Field Cultural Landscape Report (prepared for the Department of the Navy in 2010), described the Japanese airfield surface in this area as in “fair” instead of “degraded” condition. Based on a NPS site visit in 2024, the condition does not appear to have significantly changed since 2010. It is noteworthy that damage to the paving visible in the photograph primarily consists of character-defining bomb craters and strafe marks from the U.S. invasion of Tinian in World War II. Additionally, while the perimeter of the Japanese Air Apron is overgrown with vegetation, the apron itself remains open and the visual connections and relationships between historic buildings and structures (including the air raid shelter visible in the photograph) are relatively intact in this area.</li> <li>Viewpoint 4 (pg. 3-49) depicts a portion of the Atomic Bomb Loading Apron (camera facing north) rather than the caption statement of a view from taxiways 7/8 toward the western edge of the proposed Multi-purpose Maneuver Range.</li> </ul> <p>The Department recommends that the analysis of visual resources includes assessment of potential impacts to aerial views of North Field, which are identified as character-defining features in the <i>2010 Tinian North Field Cultural Landscape Report</i> (pgs. 4-35, 4-36). The North Field NHL is also clearly visible from passenger flights between Saipan and Tinian. Including aerial views of North Field and the adjacent cultural landscape would thus be consistent with the RDEIS’s stated procedure to select observation points for analysis that include “sensitive scenic and cultural resources” and that “people are accustomed to seeing as part of the general landscape” (pg. 4-56). To demonstrate potential impacts, we suggest that the RDEIS includes a “simulated conditions” rendering similar to the image from the summit of Mt. Lasso included on pg. 4-65.</p>	<p>Table 3.6-1 in the Final EIS has been edited based on information provided in the comment.</p> <p>Regarding an aerial view of North Field, project components would be visible from passing aircraft. The proposed action would be consistent with North Field’s historical military use and its historical significance, which saw considerably more development and vegetation clearing during the period of significance, resulting in a less than significant impact. No new simulation has been created; however, Section 4.6 of the Final EIS has been updated to incorporate the analysis of viewing the North Field from aircraft.</p>

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43B	<p><u>RDEIS Section 4.5.3.2 – Construction</u></p> <p>The Department recommends that USMC provide additional information to support the statement on pg. 4-53 that “Utility lines (i.e., electrical, communication, and water) would be installed along either side of existing roadways in previously disturbed areas.” It is our understanding that no major construction or modifications have occurred along historic roadway corridors in the North Field NHL since World War II. Documentation of any such disturbance along the proposed utility lines, including when the disturbance occurred and the extent to which it may have impacted cultural resources (including archaeological resources as well as historic features associated with pre-war Japanese and U.S. World War II military construction), will help minimize the potential for unanticipated adverse effects to previously unrecorded resources. We also suggest that this be addressed in the Data Recovery and Archaeological Monitoring Plan stipulated in the draft Programmatic Agreement (Appendix H).</p>	<p>An analysis supporting the finding of no adverse effect related to the placement of utilities was presented to consulting parties, including the National Park Service, on April 18, 2025, with no comment or disagreement from the consulting parties (see Appendix A of the Revised Draft EIS). The rationale for this finding of effect from this portion of the undertaking was that the construction of the roadway would likely have destroyed historic properties immediately adjacent to the roadbed, where new utilities may be placed. In addition, an archaeological monitor is proposed for ground disturbing construction activities. The proposed Data Recovery and Archeological Monitoring Plan would incorporate provisions consistent with the Advisory Council on Historic Preservation’s “Recommended Approach for Consultation on Recovery of Significant Information from Archaeological Sites.”</p>
44A	<p>Our understanding is that we can expect peak levels of 117dB for explosive training and 104dB for aviation training that will be heard by our campus, and our concern is the following:</p> <p>The level of noise having a negative impact on our students and staff, especially on those who are particularly sensitive to strong sources of stimuli</p> <p>The frequency of the impact from the noise being described as occurring “intermittently” (page 4-88), suggesting irregularity in how often it will have an impact on our campus.</p> <p>Tinian Middle School and Tinian High School serves a diverse student population that includes students who are sensitive to high levels of certain stimuli, which includes noise and vibrations. The noise may also become a potential source of anxiety for our campus population due to the intensity and source of the sound. Both situations have the potential to disrupt student learning as teachers will have to address the behaviors that develop in students who are over stimulated or experiencing high levels of anxiety.</p> <p>Should the proposed action be implemented, we ask for proper channels of communication to be established between the school (including the Public School System) and the entities charged with the scheduling and organization of these activities. This will allow school staff to be informed in a timely manner and be prepared to support our students prior to the peak noise levels being experienced. This includes ensuring that all students are inside the classrooms during the activities in order to limit student exposure to the sounds.</p>	<p>The Revised Draft EIS evaluated potential effects of the Proposed Action training-related aircraft operations and other noise-generating activities on schools and other noise-sensitive locations (see Section 4.8, Noise). Table 4.8-2 of the Revised Draft EIS presented the primary metric for significance analysis of potential noise impacts.</p> <p>For aviation operations, the screening criteria for classroom learning impacts begins at 60 decibels day-night average sound level. None of the public schools on Tinian are located in areas that would experience a day-night average sound level exceeding 50 decibels.</p> <p>Regarding explosive training, threshold levels for single event blast noise are also defined differently from small arms. Peak sound levels at 115 decibels or less would be considered audible but are unlikely to produce annoyance; at peak sound levels between 115 and 130 decibels the risk of annoyance becomes moderate as events may be noticeable and distinct from other sounds; at peak sound levels of 130 decibels or greater the sound is very loud, may cause a startle effect, and the risk of annoyance becomes high. Tinian High School and Tinian Middle School are adjacent to each other and Table 4.8-5 shows that peak noise levels at Tinian High School would be 117 decibels. Thus, additional noise reduction strategies and minimization measures such as soundproof installation would not be warranted.</p> <p>On-island Range Control, which would be established by the USMC on Tinian, would be responsible for scheduling training, managing range safety and emergency response, publishing announcements and notices about proposed training, coordinating communications and data requirements, range maintenance, and ensuring</p>

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	<p>We also ask that further consideration and accommodation be given to the school, potentially in the form of building modifications, such as improved soundproofing insulation, to ensure that the impact experienced inside the classroom is mitigated as much as possible.</p>	<p>environmental regulatory compliance. Range Control may adjust range management strategies based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p>
45A	<p>I would like to offer some points for consideration regarding the proposed Danger Zone off the North end of Tinian, in our (public access) navigable waters. I have been operating boats here in the CNMI as a USCG licensed mariner since 2001. For the first ten years of my residence here I owned and operated two scuba diving charter boats. Weekly we would take divers down to the west side of Tinian 3-7 days a week with either one or two boats. Currently I my marine transportation job is limited to inside the Tanapag Lagoon, almost exclusively. However, I am still connected with the charter boats and scuba diving companies here on Saipan, as well as a recreational sport fisherman. I am also in weekly if not daily conversations with three separate shipping services here that supply goods (by boat) to Tinian and Rota.</p> <p>Regarding the shipping of goods to Tinian and Rota, having the Danger Zone in place for days or weeks at a time will create an instant rise in the already exorbitant price of goods for those islands. The Danger Zone as proposed is in the highest trafficked area in between Tinian and Saipan. Because of our prevailing weather patterns, I estimate 95% of the year every mariner will choose to navigate down the west side of Tinian in transit between Saipan and Tinian. The east side will have ocean swell, wind and hazardous seas for vessels less than 100 feet in length. The shortest path for crossing the Tinian Channel is in between Cross Point on Tinian, going northeast to Saipan. The additional cost of fuel (being forced to drive several miles offshore and out from the Danger Zone) alone will force the shipping companies to raise their prices, passing on the added expense to their customers. We are in a depressed economy. Every price increase is felt at every level of our demographics. Changing the location, direction and timing of the Danger Zone can help minimize the military expansion on Tinian becoming a growing economic burden that the civilian population has to deal with. From a civilian’s point of view, the option to choose the one area to designate as a Danger Zone which every mariner who makes the trip between Tinian and Saipan by boat will use makes no sense. A more reasonable compromise would be to designate the eastern side of Tinian, facing the Pacific Ocean. And posting the zone as active live-fire training for days or weeks at a time is not reasonable. I think we can agree to maybe not more than 2 days in one week. Something like that. But to leave it open ended that an area</p>	<p>The surface danger zones that extend over the water would be established for live-fire training events (refer to Figure 2.2-1 in the Revised Draft EIS). The purpose of the surface danger zones is to provide safe separation of non-participating personnel and the public from live-fire training. The surface danger zones would be active only during live-fire training. Surface danger zones are three-dimensional areas consisting of land and airspace within which a potential ricochet or fragmentation associated with live-fire activities, to include explosives and demolitions, would be contained. Surface danger zones are designed to a one in one million escapement probability standard. The surface danger zone in effect would depend on the type of ammunition used:</p> <ul style="list-style-type: none"> <li>• 5.56-millimeter ammunition: surface danger zone extends about 1.1 miles offshore (used approximately 70 percent of the time)</li> <li>• 7.62-millimeter ammunition: surface danger zone extends about 2.5 miles offshore (used approximately 20 percent of the time)</li> <li>• 0.50 caliber ammunition: surface danger zone extends about 3.2 miles offshore (used approximately 10 percent of the time).</li> </ul> <p>The USMC considered criteria, as described in the Revised Draft EIS Section 2.1.5.1 Multi-Purpose Maneuver Range, and determined there was only one reasonable location and orientation for the Multi-Purpose Maneuver Range (shown in Figure 2.1-6 of the Revised Draft EIS). This location, north of the North Field National Historic Landmark on the northern tip of Tinian, would place the Multi-Purpose Maneuver Range as far away as possible from the village of San Jose to minimize potential impacts from training events on residents and also ensure that training activities do not interfere with tourism in the North Field National Historic Landmark and civilian air traffic. This proposed configuration for the Multi-Purpose Maneuver Range would take advantage of the location of the 1940s mapped roads in this area and conform to the shape of the north tip of Tinian, with the northern proposed range boundary following the edge of the natural terrain.</p> <p>Text has been added to the Final EIS Section 4.3.3.1 stating “The activation of surface danger zones would also affect commercial shipping vessels transiting in the waters north of Tinian. In comparison to daily fishing and boating, commercial vessels would be present less frequently, and include smaller commercial shippers and approximately four barge trips per month. In order to minimize impacts to shipping schedules, Range Control would coordinate with the Commonwealth Ports Authority to ensure</p>

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	<p>will be closed indefinitely or until we say so is not something we would agree to. There has to be limits.</p>	<p>scheduling of training events is understood and communication about shipping schedules is known and any temporary access restrictions would be discussed. The USMC would utilize adaptive management to ensure range safety and scheduling requirements are met, and would make adjustments as needed. Therefore, there would be a less than significant impact to commercial shipping as a result of training under Alternative 1.”</p>
45B	<p>My other concern with regards to this proposed Danger Zone is the notification process. How will mariners know when it is safe and when it is closed (wherever the zone may be agreed upon)? Several of the small commercial fishing vessels do not carry VHF radios. As a merchant mariner, I am obligated to carry a VHF and monitor channel 16. I will be advised when the training area is being enforced. Not all vessels will be ‘in the know’. How will that be handled? I have heard about fishermen being arrested for this type of infraction off of Guam. This is very unfortunate and avoidable.</p>	<p>Two surface radar towers would be located on the north and northwest coastline of Tinian. When live-fire training is conducted and one of the surface danger zones has been activated, there would be a lit red light on the towers, and a red flag would be flown. This practice is consistent with Marine Corps Order 3550.10 (Policies and Procedures for Range and Training Area Management) and other USMC range standard operating procedures. An additional safety feature is the surface radar housed in the towers would be used to survey the ocean surface to detect and provide an early warning to Range Control should a boat, or a member of the public or other non-participant, approach the activated surface danger zone from offshore. Should an unplanned encroachment be detected by Range Control (surface vessel or aircraft in the overlying airspace), all training would cease until the non-participant is out of the area. If the range is active prior to surface radar towers being constructed or if surface radar is down for maintenance, trained field spotters would be used. Spotters would be positioned at coastal observation points with unobstructed views of the surface danger zones and would maintain continuous visual surveillance of the ocean surface. Spotters would communicate directly with Range Control to provide early warning of any surface vessels or other non-participants approaching or entering an active danger zone.</p> <p>As described in Sections 2.1.6 (Live-Fire Range Safety Areas) and 4.1 (Public Access) of the Revised Draft EIS, surface danger zones would be temporarily activated during scheduled live-fire events. These areas would not be permanently closed. Notification of surface danger zone activations would be made through the U.S. Coast Guard’s Notice to Mariners system, along with other public communication channels. The USMC would continue to work with the CNMI government and Municipality of Tinian to determine the appropriate methods to ensure mariners, including subsistence and night fishermen, receive timely and effective information. The USMC solicited suggestions from the community on the best means of communicating with the fishing and boating community. Input included multilingual notices, physical posting of schedule and other pertinent information at marinas, and use of social media or radio.</p> <p>As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long</p>

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		training would occur. Range Control may adjust range operating procedures for communication based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).
45C	With regards to the training area(s) on Guam, do they offer something different than what the training on Tinian will look like? Why is the live-fire training on Tinian even necessary when you already have the established facility on Guam? Tinian is such a small island and the ocean around it provides so much to all the people who call this area home. To reduce our access to not only the land but now the oceans too, seems to be an overreach.	<p>The proposed Multi-Purpose Maneuver Range is designed to support platoon-level maneuver training, including coordinated movement and live-fire across multiple lanes within designated surface danger zones. The proposed Explosives Training Range is a separate, fixed-location range intended for controlled explosives training and would not involve maneuver or movement across multiple lanes. Both ranges are sited within the Military Lease Area and include required safety buffers and surface danger zones to protect public safety.</p> <p>Alternative sites, including other islands and uninhabited northern areas, were evaluated but eliminated when they did not meet operational access, safety, or infrastructure requirements. Consistent with Section 806 of the Covenant, the USMC is not seeking other property in the CNMI but using land resources on Tinian that it already has under lease.</p>
46A	Don't pollute our beautiful ocean. It will devastate precious marine life. It will also reduce the number of tourists visiting Saipan, a tourist island.	All activities, training and construction, would occur within the Military Lease Area inland from the mean high-water mark on beaches on Tinian. This means that no training associated with this action would occur in the water. The USMC has determined there would be minimal impacts on marine life and other ocean resources and has consulted with federal regulatory agencies under Section 7 of the Endangered Species Act and the Magnuson-Stevens Fishery Conservation and Management Act. The USMC will abide by any Biological Opinions issued in compliance with these Acts.
47A	<p>Hafa Adai, I am Jack Manglona and in behalf of Tinian Shipping Services LLC – a stakeholder in the shipping industry, I would like to express the business' opposition on the proposed temporary closure of offshore waters during live-fire events in relation to the CNMI Joint Military Training EIS.</p> <p>Tinian Shipping is a small cargo interisland shipping business that conducts reliable regular operations between the islands of Saipan, Tinian and Rota – at the most reasonable cost. Our shipping operations rely on our current established route – direct, safe, efficient and is proven to be the optimal route because of its navigational ease, cost efficiency and travel time wise.</p> <p>Any closure or rerouting would force our vessels to take significantly longer travel paths, resulting in higher fuel consumption, extended transit times, and increased operational expenses. On top of these already dreading effects, what we are most apprehensive about is that the cargoes, the vessel and our crew will</p>	<p>Text has been added to the Final EIS Section 4.3.3.1 stating “The activation of surface danger zones would also affect commercial shipping vessels transiting in the waters north of Tinian. In comparison to daily fishing and boating, commercial vessels would be present less frequently, and include smaller commercial shippers and approximately four barge trips per month. In order to minimize impacts to shipping schedules, Range Control would coordinate with the Commonwealth Ports Authority to ensure scheduling of training events is understood and communication about shipping schedules is known and any temporary access restrictions would be discussed. The USMC would utilize adaptive management to ensure range safety and scheduling requirements are met, and would make adjustments as needed. Therefore, there would be a less than significant impact to commercial shipping as a result of training under Alternative 1.”</p> <p>As described in Sections 2.1.6 (Live-Fire Range Safety Areas) and 4.1 (Public Access) of the Revised Draft EIS, surface danger zones would be temporarily activated during</p>

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	<p>be exposed to a rougher and more hazardous sea conditions—compromising overall safety.</p> <p>These burdens ultimately affect not just our operations, but also local businesses and residents who depend on the timely and affordable delivery of essential goods, including food, supplies, and construction materials.</p> <p>We urge our decision-makers to consider alternative measures that balance national security training requirements with the economic sustainability of essential commercial shipping services. Options may include designating safe passage corridors, scheduling exercises to minimize conflicts with regular vessel traffic (not entirely closing the route), or providing advance notice and coordination to reduce disruption.</p> <p>Maintaining open and efficient maritime routes is critical for the CNMI's economy and community well-being. We respectfully request that the final EIS reflect these concerns and incorporate safeguards to protect the viability of commercial shipping.</p>	<p>scheduled live-fire events. These areas would not be permanently closed. Notification of surface danger zone activations would be made through the U.S. Coast Guard's Notice to Mariners system, along with other public communication channels. The USMC would continue to work with the CNMI government and Municipality of Tinian to determine the appropriate methods to ensure mariners, including subsistence and night fishermen, receive timely and effective information. The USMC solicited suggestions from the community on the best means of communicating with the fishing and boating community. Input included multilingual notices, physical posting of schedule and other pertinent information at marinas, and use of social media or radio.</p> <p>As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. Range Control may adjust range operating procedures for communication based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p>
48A	<p>The military's proposed surface danger zone on the northwest end of Tinian would have severe consequences for marine traffic, commercial activity, and tourism in the CNMI. This exclusion zone directly overlaps the most heavily trafficked and safest maritime corridor between Saipan and Tinian.</p> <p>The proposed three-mile exclusion zone would force vessels—fishermen, SCUBA diving companies, cargo carriers, and recreational users alike—several miles offshore into deeper, rougher seas. This leads to at least two additional miles to a crossing under glassy seas with no wind. The excursion further offshore will undoubtedly lead to higher costs. Many companies that operate vessels are already struggling in our depressed economy, and the additional fuel and maintenance costs will inevitably be passed on to consumers, raising the already high cost of goods for residents of Tinian and Rota. This burden would be felt at every level of our community's demographics, and could lead to a vicious cycle that ultimately ends with the closure of these businesses.</p> <p>Navigating further offshore is not just more costly but also more dangerous, particularly for smaller vessels. The east side of Tinian is exposed to ocean swells and strong trade winds for most of the year, making it unnavigable to smaller vessels except during the calmest summer months – making it a better option for the danger zone than the heavily trafficked west-side route. The current danger zone would force mariners into deeper waters which increases risks from larger waves, stronger currents, and sudden changes in weather. This raises a critical safety issue for the many, recreational boaters, local fishermen,</p>	<p>Two surface radar towers would be located on the north and northwest coastline of Tinian. When live-fire training is conducted and one of the surface danger zones has been activated, there would be a lit red light on the towers, and a red flag would be flown. This practice is consistent with Marine Corps Order 3550.10 (Policies and Procedures for Range and Training Area Management) and other USMC range standard operating procedures. An additional safety feature is the surface radar housed in the towers would be used to survey the ocean surface to detect and provide an early warning to Range Control should a boat, or a member of the public or other non-participant, approach the activated surface danger zone from offshore. Should an unplanned encroachment be detected by Range Control (surface vessel or aircraft in the overlying airspace), all training would cease until the non-participant is out of the area. If the range is active prior to surface radar towers being constructed or if surface radar is down for maintenance, trained field spotters would be used. Spotters would be positioned at coastal observation points with unobstructed views of the surface danger zones and would maintain continuous visual surveillance of the ocean surface. Spotters would communicate directly with Range Control to provide early warning of any surface vessels or other non-participants approaching or entering an active danger zone.</p> <p>As described in Section 4.1 (Public Access) of the Revised Draft EIS, surface danger zones would be temporarily activated during scheduled live-fire events. These areas would not be permanently closed. Notification of surface danger zone activations would be made through the U.S. Coast Guard's Notice to Mariners system, along with</p>

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	<p>and small-scale transport operators who lack the size or equipment to safely operate offshore.</p> <p>The west side of Tinian is a cornerstone of the tourism economy, hosting world-class dive sites and attracting visitors during the calm summer season. Closing this area for live-fire exercises during peak tourist months would undercut the CNMI’s image as a pristine, quiet, and welcoming destination. Tourists paying for a diving trip will not appreciate being diverted around a danger zone or hearing live-fire in the background. Studies from Guam have already documented the negative effect of military training activities on tourism and community well-being.</p> <p>The proposed duration of closures—“open-ended” or “until training is complete”—is unacceptable. Any closure should be strictly limited in time with advance notice. Mariners also need a clear and reliable way to know when a zone is active. Many small fishing boats do not carry VHF radios, and may inadvertently cross into a danger zone. The CNMI cannot afford disastrous incidents that may taint its reputation as a pristine and relaxing getaway, and that may cause harm to its local residents.</p>	<p>other public communication channels. Range Control would work with the CNMI government and Municipality of Tinian to determine the appropriate methods to ensure mariners, including subsistence and night fishermen, receive timely and effective information. The USMC solicited suggestions from the community on the best means of communicating with the fishing and boating community. Input included multilingual notices, physical posting of schedule and other pertinent information at marinas, and use of social media or radio.</p> <p>Text has been added to the Final EIS Section 4.3.3.1 stating “The activation of surface danger zones would also affect commercial shipping vessels transiting in the waters north of Tinian. In comparison to daily fishing and boating, commercial vessels would be present less frequently, and include smaller commercial shippers and approximately four barge trips per month. In order to minimize impacts to shipping schedules, Range Control would coordinate with the Commonwealth Ports Authority to ensure scheduling of training events is understood and communication about shipping schedules is known and any temporary access restrictions would be discussed. The USMC would utilize adaptive management to ensure range safety and scheduling requirements are met, and would make adjustments as needed. Therefore, there would be a less than significant impact to commercial shipping as a result of training under Alternative 1.”</p> <p>As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. Range Control may adjust range operating procedures for communication based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p>
48B	<p>The U.S. military also needs to conduct baseline studies on Tinian to understand how its exercises on Tinian affect the islands. For instance, we do not know how much lead is leeching into the porous limestone that Tinian is made of, which will subsequently make its way to the groundwater supply. How other toxic compounds associated with live-fire exercises, demolitions training, and an increase with all other things associated with the military’s presence on Tinian affect it.</p> <p>I support the military and respect the sacrifices of service members. But the placement, scope, and duration of this proposed danger zone reflect an overreach that places a disproportionate burden on civilian communities. The Marianas already served its role during World War 2 and is still suffering the</p>	<p>The Revised Draft EIS includes a proposed management measure to construct up to four monitoring wells at each of the two proposed live-fire ranges, establish a water monitoring plan, and include one year of baseline monitoring before ranges would become operational. The DoD would continue to coordinate with CNMI Bureau of Environmental and Coastal Quality on specific details such as the locations of wells and an appropriate sampling frequency.</p> <p>As described in Section 4.14 (Surface Waters and Wetlands) of the Revised Draft EIS, the primary condition that would influence the movement or mobility of lead or other metals, such as copper, in an environment is the pH of the soil. The geology of Tinian is predominantly karst, and the soils are derived from limestone bedrock with abundant carbonates and are naturally neutral (pH 6.5–7.0) to alkaline (greater than 7.0). At neutral pH, heavy metals, like lead, become relatively insoluble and the potential for lead to be transported to the ground water or in surface water runoff</p>

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	<p>consequences of legacy contaminants and polluted waters. The military should not make things worse than they already are in the Marianas.</p>	<p>would be very low (Weil and Brady 2017). Because of the relative scarcity of surface waters on Tinian, best management practices, stormwater management systems, and the natural adsorption of Tinian’s soils, training events under Alternative 1 would have less than significant impacts to surface waters and wetlands.</p> <p>Additionally, information has been added to the Final EIS in Section 4.10.3 (Public Health and Safety) with a description of the Range Environmental Vulnerability Assessment program and how the program would serve to monitor the potential for off range migration of munitions constituents at the ranges on Tinian. The Range Environmental Vulnerability Assessment program includes conducting an assessment to gain a better understanding of the potential transport of munitions constituents from the use of the proposed live-fire range areas. This assessment would include modeling worst case scenario for munitions constituents migration to off range areas including where pathways could reach groundwater.</p>
49A	<p>The military’s proposed surface danger zone on the northwest end of Tinian would have severe consequences for marine traffic, commercial activity, and tourism in the CNMI. This exclusion zone directly overlaps the most heavily trafficked and safest maritime corridor between Saipan and Tinian.</p> <p>The proposed three-mile exclusion zone would force vessels—fishermen, SCUBA diving companies, cargo carriers, and recreational users alike—several miles offshore into deeper, rougher seas. This leads to at least two additional miles to a crossing under glassy seas with no wind. The excursion further offshore will undoubtedly lead to higher costs. Many companies that operate vessels are already struggling in our depressed economy, and the additional fuel and maintenance costs will inevitably be passed on to consumers, raising the already high cost of goods for residents of Tinian and Rota. This burden would be felt at every level of our community’s demographics, and could lead to a vicious cycle that ultimately ends with the closure of these businesses.</p> <p>Navigating further offshore is not just more costly but also more dangerous, particularly for smaller vessels. The east side of Tinian is exposed to ocean swells and strong trade winds for most of the year, making it unnavigable to smaller vessels except during the calmest summer months – making it a better option for the danger zone than the heavily trafficked west-side route. The current danger zone would force mariners into deeper waters which increases risks from larger waves, stronger currents, and sudden changes in weather. This raises a critical safety issue for the many, recreational boaters, local fishermen, and small-scale transport operators who lack the size or equipment to safely operate offshore.</p>	<p>The location and orientation of the proposed Multi-Purpose Maneuver Range and associated surface danger zones were identified to meet range safety requirements while minimizing impacts to surrounding land and waters, as described in Section 2.1.6 of the Final EIS.</p> <p>As described in Table 2.1-1 and Section 2.1, training events may last from one to four weeks depending on size; however, live-fire activities occur during only a limited portion of those events. The surface danger zones associated with the Multi-Purpose Maneuver Range would be activated only during live-fire periods and would not remain active for the full duration of a training event. Surface danger zones would be deactivated immediately following completion of live-fire activities.</p> <p>The extent of the surface danger zone would vary based on ammunition type, with larger surface danger zones required infrequently. When active, the surface danger zone would be monitored using surface radar towers, warning lights, flags, and trained spotters in accordance with Marine Corps Order 3550.10. If an unplanned encroachment is detected, all live-fire training would cease until the area is clear.</p> <p>Notification of surface danger zone activation would be provided through the U.S. Coast Guard’s Notice to Mariners and other communication channels. Range Control would continue to coordinate with the CNMI government and the Municipality of Tinian to provide advance notice of where, when, and for how long live-fire activities would occur and may adjust communication procedures based on community feedback using an adaptive management approach.</p> <p>Text has been added to the Final EIS Section 4.3.3.1 stating “The activation of surface danger zones would also affect commercial shipping vessels transiting in the waters north of Tinian. In comparison to daily fishing and boating, commercial vessels would</p>

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	<p>The west side of Tinian is a cornerstone of the tourism economy, hosting world-class dive sites and attracting visitors during the calm summer season. Closing this area for live-fire exercises during peak tourist months would undercut the CNMI’s image as a pristine, quiet, and welcoming destination. Tourists paying for a diving trip will not appreciate being diverted around a danger zone or hearing live-fire in the background. Studies from Guam have already documented the negative effect of military training activities on tourism and community well-being.</p> <p>The proposed duration of closures—“open-ended” or “until training is complete”—is unacceptable. Any closure should be strictly limited in time with advance notice. Mariners also need a clear and reliable way to know when a zone is active. Many small fishing boats do not carry VHF radios, and may inadvertently cross into a danger zone. The CNMI cannot afford disastrous incidents that may taint its reputation as a pristine and relaxing getaway, and that may cause harm to its local residents.</p>	<p>be present less frequently, and include smaller commercial shippers and approximately four barge trips per month. In order to minimize impacts to shipping schedules, Range Control would coordinate with the Commonwealth Ports Authority to ensure scheduling of training events is understood and communication about shipping schedules is known and any temporary access restrictions would be discussed. The USMC would utilize adaptive management to ensure range safety and scheduling requirements are met, and would make adjustments as needed. Therefore, there would be a less than significant impact to commercial shipping as a result of training under Alternative 1.”</p>
49B	<p>The U.S. military also needs to conduct baseline studies on Tinian to understand how its exercises on Tinian affect the islands. For instance, we do not know how much lead is leeching into the porous limestone that Tinian is made of, which will subsequently make its way to the groundwater supply. How other toxic compounds associated with live-fire exercises, demolitions training, and an increase with all other things associated with the military’s presence on Tinian affect it.</p> <p>I support the military and respect the sacrifices of service members. But the placement, scope, and duration of this proposed danger zone reflect an overreach that places a disproportionate burden on civilian communities. The Marianas already served its role during World War 2 and is still suffering the consequences of legacy contaminants and polluted waters. The military should not make things worse than they already are in the Marianas.</p>	<p>The Revised Draft EIS included a proposed management measure to construct up to four monitoring wells at each of the two proposed live-fire ranges, establish a water monitoring plan, and include one year of baseline monitoring before ranges would become operational. The DoD would continue to coordinate with CNMI Bureau of Environmental and Coastal Quality on specific details such as the locations of wells and an appropriate sampling frequency.</p> <p>Additionally, a description of the Range Environmental Vulnerability Assessment program and how the program would serve to monitor the potential for off range migration of munitions constituents at the ranges on Tinian has been added to the Final EIS in Section 4.10.3 (Public Health and Safety). The Range Environmental Vulnerability Assessment program includes conducting an assessment to gain a better understanding of the potential transport of munitions constituents from the use of the proposed live-fire range areas. This assessment would include modeling worst case scenario for munitions constituents migration to off range areas including where pathways could reach groundwater.</p>
50A	<p>Tinian can be a military hub, for both Airforce and Ground Forces, all live-fire training must be for the Airforce, use Faralon De Medinilla and live-fire; “e.g.”, for ground forces should use Pagan Island with additional leasehold agreements.</p>	<p>Military training on Farallon De Medinilla is evaluated in the MITT EIS/OEIS. This Proposed Action only considers training within the Military Lease Area on Tinian. No training is being considered on the island of Pagan.</p>

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51A	<p>The live-fire area to the north-west of Tinian should be designed to avoid “overshooting” into our pristine waters that support fishing and commuters via water to and from Tinian and Saipan.</p> <p>Please look into the feasibility of moving the range to the east side of Tinian where there is very little water activity.</p>	<p>In siting the Multi-Purpose Maneuver Range, USMC range experts considered criteria, as described in the Revised Draft EIS, Section 2.1.5.1 (Training Infrastructure, Multi-Purpose Maneuver Range), and determined there was only one reasonable location and orientation for the Multi-Purpose Maneuver Range (shown in Figure 2.1-6 of the Revised Draft EIS). This location, north of the North Field National Historic Landmark on the northern tip of Tinian, would place the Multi-Purpose Maneuver Range as far as possible from the village of San Jose to minimize potential impacts from training events on residents and also ensure that training activities do not interfere with tourism in the North Field National Historic Landmark and civilian air traffic. This proposed configuration for the Multi-Purpose Maneuver Range would take advantage of the location of the 1940s mapped roads in this area and conform to the shape of the north tip of Tinian, with the northern proposed range boundary following the edge of the natural terrain.</p> <p>The USMC acknowledges that the surface danger zone for the proposed Multi-Purpose Maneuver Range extends into adjacent offshore waters that include routes used by commercial and recreational vessels. Surface danger zones are three-dimensional areas consisting of land and airspace within which a potential ricochet or fragmentation associated with live-fire activities, to include explosives and demolitions, would be contained. Surface danger zones are designed to a one in one million escapement probability standard. The Revised Draft EIS (Section 2.1.5.1, Multi-Purpose Maneuver Range) states that direct weapons fire is oriented toward designated target areas within the Multi-Purpose Maneuver Range. The associated surface danger zone may extend partially over adjacent offshore waters as a conservative buffer for ricochet or fragmentation; weapons are not aimed at the ocean.</p>
54A	<p>The need for alternatives that do not compromise public access or environmental health for SCUBA DIVING area.</p>	<p>Section 2.1.8.1 (Scheduling and Logistics for Use of the Military Lease Area Training Areas and Ranges) of the Revised Draft EIS stated that, “The USMC is committed to developing an approach for community access that balances the need for military readiness with safe public access to the Military Lease Area.”</p> <p>For training scheduling purposes, the Military Lease Area would be divided into eight smaller, separate training areas allowing safe public access in areas where training activities would not be occurring. During some training events, public access may be limited for the safety of the public and service members participating in the training. However, when possible, public access to recreational beaches, tourism areas, and the North Field National Historic Landmark would continue to be available to the local community and tourists even when training may be occurring. Some training could be conducted without any access controls.</p> <p>The USMC would continue to coordinate construction and training with the CNMI government and Municipality of Tinian to determine the appropriate methods to</p>

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		<p>ensure timely and effective information of construction and training schedules (e.g., multilingual notices, physical posting of schedule and other pertinent information at marinas, use of social media or radio). As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community will have advance notice of where, when, and how long training would occur. Range Control would also work with the Municipality of Tinian to identify in advance any holidays, festivals, or other important days for which public access is needed. Range Control may adjust range management strategies based on community tradition, knowledge, and experience into new information to improve outcomes as needed (i.e., utilize adaptive management).</p>
58A	<p>Greetings, my concern is that I drive a diving vessel and need access to the area where training is proposed. The vessel I am usually operating has only a 3 mile offshore distance.</p> <p>I need to get to the dive points on the west side of Tinian, also when seas are rough heading to dive points I maneuver the vessel near the island to hide from wind and waves. I really hope and suggest that the training will be done on a land range, it's enough that the economy for tourists is really bad, so please do not take our access away from us, thank you and best regards.</p>	<p>In siting the Multi-Purpose Maneuver Range, USMC range experts considered criteria, as described in the Revised Draft EIS, Section 2.1.5.1 (Training Infrastructure, Multi-Purpose Maneuver Range), and determined there was only one reasonable location and orientation for the Multi-Purpose Maneuver Range (shown in Figure 2.1-6 of the Revised Draft EIS). This location, north of the North Field National Historic Landmark on the northern tip of Tinian, would place the Multi-Purpose Maneuver Range as far as possible from the village of San Jose to minimize potential impacts from training events on residents and also ensure that training activities do not interfere with tourism in the North Field National Historic Landmark and civilian air traffic. This proposed configuration for the Multi-Purpose Maneuver Range would take advantage of the location of the 1940s mapped roads in this area and conform to the shape of the north tip of Tinian, with the northern proposed range boundary following the edge of the natural terrain.</p> <p>As described in Table 2.1-1 and Section 2.1 (Proposed Action) of the Revised Draft EIS, small training events of up to 100 personnel may occur routinely throughout the year, generally lasting one to two weeks each. These training events include pre-live-fire activities (e.g., planning, rehearsal, and setup), a limited period of live-fire training, and post-training activities (e.g., recovery and debrief). Use of the surface danger zones associated with the Multi-Purpose Maneuver Range would be temporary and only active during the periods when live-fire training is conducted and would not remain active for the full duration of a training event. The surface danger zone would be deactivated immediately following completion of live-fire activities. Range Control would issue advance public notifications prior to surface danger zone activation and ensure access restrictions are lifted promptly once live-fire training concludes. As described in Sections 2.1.6 (Live Fire Range Safety Areas) and 4.1 (Public Access) of the Revised Draft EIS, surface danger zones would be temporarily activated during scheduled live-fire events. These areas would not be permanently closed. Notification of surface danger zone activations would be made through the U.S. Coast Guard's Notice to Mariners system, along with other public communication channels. The</p>

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		<p>USMC would work with the CNMI government and Municipality of Tinian to determine the appropriate methods to ensure mariners, including subsistence and night fishermen, receive timely and effective information. The USMC solicited suggestions from the community on the best means of communicating with the fishing and boating community. Input included multilingual notices, physical posting of schedule and other pertinent information at marinas, and use of social media or radio.</p> <p>As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. Range Control may adjust range operating procedures for communication based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p>
59A	<p><i>Groundwater Protection</i></p> <p>The EPA appreciates the improvement in the Draft EIS groundwater analysis since 2015, including robust groundwater modeling. As the Draft EIS discusses, Tinian relies completely on groundwater for its water supply, and the basal freshwater lens underlying Tinian is the only source of drinking water for island residents. We recommend that the Marine Corps commit to conducting comprehensive groundwater monitoring that proactively assesses the configuration and integrity of the basal lens aquifer on Tinian through measuring water levels, pumping rates, and salinity concentrations while including environmental response actions and contingency plans should monitoring detect increasing salinity or groundwater contamination. We also recommend the Marine Corps consider providing funding and technical assistance to improve the resilience of the community drinking water system, thereby improving the resilience of the aquifer.</p> <p><u>Groundwater Resources</u> Aquifer Management and Resilience</p> <p>As the Draft EIS discusses, Tinian relies on a shallow groundwater aquifer for its water supply, and the basal freshwater lens underlying Tinian is the only source of drinking water for island residents (p. 3- 93). The aquifer is vulnerable to saltwater intrusion if groundwater extraction is not managed sustainably and is also susceptible to contamination due to Tinian’s highly permeable geology (p. 3-95). The Proposed Action, if implemented, would result in two separate drinking water systems on Tinian extracting water from this single aquifer – one system managed by the Commonwealth Utilities Corporation (CUC) for the community as well as for some DoD water needs, and a second system managed</p>	<p>A comprehensive hydrological study for the Proposed Action, called the Groundwater Modeling Technical Memorandum, was included in Appendix M (Utility Studies) of the Revised Draft EIS. Section 4 of the study considered groundwater demand, including current and projected demands for all uses (related to the Proposed Action, other DoD, and non-DoD water demands) to evaluate impacts from the Proposed Action. This study supported the determination that the Proposed Action would not result in significant impacts to groundwater (short- and long-term availability of water and groundwater quality), as described in Sections 4.11, 4.13, and 4.14 (Utilities, Groundwater and Hydrology, and Surface Waters and Wetlands, respectively). The Groundwater Modeling Technical Memorandum prepared to support the analysis in the Revised Draft EIS did not determine whether Maui Well No. 2 would be more vulnerable to stresses on the aquifer. Sections 4.11, 4.13 and Appendix M of the Final EIS have been updated to clarify the purpose of this study.</p> <p>The USMC’s groundwater model evaluated both drought and normal rainfall scenarios. The model used existing and reasonably foreseeable water demands including Commonwealth Utilities Corporation potable water demand, agricultural demands, U.S. Air Force construction and operational demands, and USMC construction and operational demands. This analysis conservatively assumed a continuation of construction demands long-term that, in reality, would only be temporary and intermittent. The model results indicated that the Proposed Action would have negligible impacts on the Commonwealth Utilities Corporation water well in either a drought or normal rainfall scenario. Specifically, the groundwater model predicted an approximately 20 milligrams/liter rise in predicted chloride concentrations in Maui Well No. 2 for drought conditions, with or without the Proposed Action.</p>

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	<p>by the Marine Corps for use by DoD. The Draft EIS groundwater modeling predicts that the DoD system would produce drinking water with appreciably lower salinity levels than the community water system. From our review of Table 8 (p. M-85), the groundwater model appears to indicate that the DoD water system may be more resilient to potential future droughts, suggesting that the community system may be more vulnerable to stresses on the aquifer. The Draft EIS is not clear whether this is an outcome from the model. The difference in design between the two systems means the DoD system would be easier to adjust to aquifer stressors such as overdraft, drought, or changing sea levels, while it is likely not possible to make significant modifications to the infiltration gallery well that provides all drinking water for the community (Maui Well No. 2).</p> <p>Using information in the Draft EIS, the EPA calculated that groundwater extraction across all proposed DoD activities, including the Proposed Action and other reasonably foreseeable actions, would increase by more than 10% over current community water usage.(1) This additional planned extraction from the only source of freshwater, together with the potential for the community system to be less resilient to aquifer stressors, highlights the need for robust groundwater monitoring that would identify potential issues early and support sustainable management. The EPA commends the Marine Corps for committing to fund a one-time hydrogeological study that would establish baseline data to support monitoring of Tinian’s aquifer and for planning to establish groundwater monitoring in the vicinity of the proposed live-fire ranges (p. 4-156). However, the potential for consequential impacts to the community from decreased water quantity and quality and the potential for groundwater contamination from other elements of the Proposed Action necessitate a more robust and proactive groundwater monitoring approach.</p> <p><i>Recommendations:</i> To support sustainable aquifer management, in the Final EIS, revise the discussion of groundwater modeling results to describe whether the model predicts that the community drinking water system may be more vulnerable to future aquifer stressors (such as drought) than the proposed DoD system and potential implications for sustainable aquifer management. Additionally, commit to conducting comprehensive and ongoing groundwater monitoring that addresses the entire Proposed Action, not just around the live-fire ranges. In the Final EIS, describe a groundwater monitoring plan for Tinian that assesses the configuration and integrity of the basal lens aquifer through measuring water levels, pumping rates, and salinity concentrations. Discuss additional groundwater monitoring well locations that would be needed to support this effort. Include an assessment of changes in salinity levels for</p>	<p>The USMC would continue to coordinate with the CNMI Bureau of Environmental and Coastal Quality on specific details such as permitting and the locations of wells, ensuring the factors referenced in this comment are fully considered. Annual CNMI Bureau of Environmental and Coastal Quality permitting requirements include reporting pumping volumes and water quality on a well-by-well basis. Based on this information, the Bureau of Environmental and Coastal Quality determines annually the allowable pumping volume for the following year.</p> <p>At the request of CNMI, the DoD would fund a one-time hydrogeological study to establish baseline data that could be used to support monitoring of Tinian’s aquifer. This study would consist of groundwater sampling at existing well locations, and laboratory testing of water samples. In addition, the DoD would install up to four groundwater monitoring wells at each of the two live-fire ranges, establish a water monitoring plan, and include one year of baseline monitoring before ranges would become operational. The locations of wells would be determined in collaboration with CNMI Bureau of Environmental Quality. Table 2.3-1 (Proposed Management Measures) in the Final EIS has been updated to reflect this proposed future hydrogeological study, and text has been updated to provide clarity on proposed groundwater monitoring wells at the live-fire ranges.</p> <p>Improving the overall resilience of Tinian’s aquifer, conducting long term monitoring of the aquifer at large, developing emergency response actions and contingency plans, and assessing the potential vulnerability of the community drinking water system is outside of the scope of this EIS.</p>

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	<p>significance even if levels are below the secondary drinking water threshold. In the groundwater monitoring plan, address all contaminants of potential concern associated with the Proposed Action, including contaminants associated with septic systems, waste disposal in unlined landfills, and munitions use. We recommend also including contaminants associated with historic military activity, which may include per- and polyfluoroalkyl substances (PFAS), metals, and pesticides. Facilitate information and data sharing with the Bureau of Environmental and Coastal Quality (BECQ), the CUC, and the EPA to support robust and joint adaptive management of the aquifer with the CNMI government. Finally, include a discussion of environmental response actions and contingency plans should monitoring detect increasing salinity or groundwater contamination.</p> <p>Consider providing funding and technical assistance to improve the resilience of the community drinking water system in collaboration with the CUC and BECQ. Given the unique and continued critical importance of Tinian as a military training site (p. 1-4-1-5 and p. 2-44-2-46) and the presence of a fragile basal lens aquifer, increasing the overall resilience of the aquifer by supporting improvements to the community drinking water system would further DoD’s national security mission. Improving community drinking water system resilience would also limit the possibility that the community system would be first to be impacted by potential future aquifer stress.</p> <p>FOOTNOTE</p> <p>(1) The EPA calculated this by summing proposed water usage from the CNMI Joint Military Training (CJMT) Base Camp water system, CJMT North Field firefighting wells, CJMT construction water usage, the Air Force North Field Rehabilitation, Tinian Divert Infrastructure Improvements, and increased CUC water system usage predicted for CJMT population changes (p. M- 32). This was compared to the average CUC water usage from 2019-2023 (p. M-15) and the assumed maximum community agricultural use of Well M-26 presented in the Draft EIS. This analysis likely underestimates DoD’s contribution to aquifer extraction on Tinian as it does not account for current CUC water system usage by DoD.</p>	

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59B	<p>The EPA values the brief discussion of changing sea levels in the Groundwater Modeling Study (p. M-105). The study notes that sea level rise is not expected to significantly change the amount of freshwater available especially in areas bounded by sea cliffs and that a significant rise in sea level could necessitate changes in well screen depths. Planning for the sustainable management of the groundwater aquifer on Tinian would benefit from an expansion of this analysis.</p> <p><i>Recommendations:</i> To inform monitoring and aquifer resilience planning, describe the most recently observed pace of sea-level rise in CNMI and discuss how different portions of the aquifer may be affected differently based on their location relative to sea cliffs. Analyze the potential impact of sea level rise on all current and proposed wells and describe which wells would more likely need rescreening or replacement to accommodate a changing aquifer configuration. Discuss the potential combined impact of increased groundwater extraction from the Proposed Action with predicted seawater levels on both the DoD and the community drinking water systems.</p>	<p>The potential effects of sea level rise on groundwater impacts were evaluated qualitatively in Appendix M (Utility Studies) within Section 5.7 (Effects of Sea Level Rise) in the Groundwater Modeling Technical Memorandum. This analysis concluded that the amount of freshwater availability would not significantly change regardless of sea level and there would be no need to perform an additional analysis as the results of the model would not change. Additionally, as described in the response to 59A above, the CNMI Bureau of Environmental and Coastal Quality issues an annual permit to operate wells annually using prior reported data and would indicate if well rescreening or replacement of wells would be required, along with the allowable pumping volume for the year when each permit is renewed. Improving the overall resilience of Tinian’s aquifer and the effect of sea level rise on the existing community drinking water system is outside of the scope of this EIS.</p>
59C	<p><i>Aquifer Protection During Well Installation</i></p> <p>The EPA appreciates the robust discussion of well siting, installation, and operation recommendations included in the Groundwater Modeling Study (p. M-111-114), which includes a list of crucial field decisions and procedures that must be implemented to protect the groundwater aquifer during construction of the new drinking water system. We note that this list includes assessing the potential for collapsed surface features at well locations and that Figure 4.12-1 maps these features as occurring at the preferred new well field location.</p> <p><i>Recommendations:</i> To ensure crucial field actions and decisions are protective of the aquifer, we strongly recommend that all final siting, design, drilling, and installation of wells be performed under the direct, on-site supervision of an experienced hydrogeologist with expertise in island hydrology. Ensure that the construction contractors installing the wells are aware of hydrologic information, well design, and installation recommendations from the Groundwater Modeling Study.</p>	<p>All wells associated with the Proposed Action would be drilled and operated as permitted by the CNMI Bureau of Environmental and Coastal Quality and in accordance with section 65-140 (CNMI Administrative Code). Section 4.11.3.1 (Utilities) and Appendix M (Utility Studies) of the Final EIS have been updated to reflect this.</p> <p>Text in Appendix C has been edited to add the requirement for a professional geologist. Section C.3.2 Utilities now reads: “The specific location of wells and tanks at North Field and Base Camp would be determined during engineering design. Installation of water wells would be conducted by a licensed driller under the guidance of a Professional Geologist.”</p>

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59D	<p><i>Groundwater Extraction</i></p> <p>The EPA is concerned that the Draft EIS is unclear about how much water can safely be produced from Maui Well No. 2. The Draft EIS states that the recent average extraction rate of Maui Well No. 2 is 0.85 million gallons per day (p. 3-82). The document also states that the well has an operational capacity of 1.5 million gallons per day (p. 3-80), although the Potable Water Study describes this as the pumping capacity of the well, allowing for one pump to be out of service, rather than a sustainable or safe yield (p. M-9). The document makes multiple references to 1.0 million gallons per day as an EPA-identified sustainable yield during drought conditions. We believe this figure may have been a suggestion made by staff to support analysis of the 2015 Proposed Action, rather than an official determination of ongoing sustainable drought yield for the well.</p> <p><i>Recommendation:</i> In the Final EIS, clarify that 1.5 million gallons per day is the operational pumping capacity and does not refer to a presumed sustainable yield from the Maui No. 2 well. Additionally, rely on the Groundwater Modeling Study to determine the significance of potential impacts to the aquifer rather than using the EPA suggestion that was provided in the context of the 2015 proposal.</p>	<p>Section 3.11.1 of the Final EIS has been updated to clarify the 1.5 million gallons per day capacity described for Maui Well No. 2 represents the pumping capacity, not a sustainable yield. See the response to 59A relative to the impacts of the Proposed Action on the aquifer.</p>
59E	<p>Additionally, the Draft EIS is not clear about the potential impacts of increased groundwater extraction on wetland resources. The document states that Lake Hagoi is situated over an impervious layer or perched water table (p. 3-97). However, the Draft EIS also states that it may be hydraulically connected to the groundwater, which would imply hydrology that is not associated with a separate perched water table. The source of wetland hydrology is important because if the wetland is dependent on groundwater, additional extraction could result in a reduction of the wetland resource.</p> <p><i>Recommendation:</i> In the Final EIS, clarify the source of hydrology for Lake Hagoi. If Lake Hagoi is groundwater dependent, analyze whether additional groundwater extraction could lead to wetland and habitat loss due to a lowering of the groundwater table.</p>	<p>The Revised Draft EIS referenced the best available science, which is the Gingerich 2002 report. In Gingerich 2002, it is unclear the degree to which any connection from Lake Hagoi to groundwater occurs. As such, further analysis of the impact of ground water extraction on wetland resources is not possible. Further, based on the evaluation of groundwater elevation and groundwater quality provided in the Groundwater Modeling Technical Memorandum prepared for the Revised Draft EIS (refer to Appendix M, Utilities Study), the Proposed Action would have a less than significant impact on the groundwater table. Section 3.14.2 (Surface Waters and Wetlands) of the Final EIS has been updated for clarity.</p>
59F	<p><i>Potential Groundwater Contamination</i></p> <p>While the Draft EIS provides robust analysis of potential impacts to groundwater quantity and availability from the Proposed Action, the document does not meaningfully analyze the potential for project elements to contaminate the groundwater on Tinian. The Draft EIS notes that the most sustainable</p>	<p>The potential for groundwater contamination was addressed in the Revised Draft EIS (see Sections 4.10, 4.11 and 4.13). As described in Section 4.10.3.1 (Public Health and Safety, Ground Training), lead is the primary contaminant of concern for the Multi-Purpose Maneuver Range, along with the disposition of small amounts of munitions constituents from ordnance use at both live-fire ranges. The primary condition that would influence the movement or mobility of lead or other metals, such as copper, in</p>

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	<p>approach to groundwater extraction in island environments is via a broadly distributed network of wells across the island (p. 4-141).</p> <p><i>Recommendation:</i> To preserve future capacity for increased groundwater extraction and protection of this single drinking water source, analyze the potential for groundwater contamination from the project, even if these impacts may be localized to groundwater areas that are not currently proposed for use as drinking water resources. Include analysis of the proposed septic system and leach field, use of unlined landfills without groundwater monitoring, and live-fire ranges in this analysis.</p>	<p>an environment is the pH of the soil. The geology of Tinian is predominantly karst, and the soils are derived from limestone bedrock with abundant carbonates and are naturally neutral (pH 6.5–7.0) to alkaline (greater than 7.0). At neutral pH, heavy metals, like lead, become relatively insoluble and the potential for lead to be transported to the ground water or in surface water runoff would be very low (Weil and Brady 2017). Because of the relative scarcity of surface waters on Tinian, best management practices, stormwater management systems, and the natural adsorption of Tinian’s soils, construction and training under the Proposed Action would have less than significant impacts on groundwater.</p> <p>With respect to landfills, Section 4.11.3.3 (Utilities, Solid Waste) included a proposed management measure stating the USMC would commit to fund the regular transport of military training waste generated on Tinian to compliant landfills that are authorized to accept the waste, and these could include a future permitted landfill on Tinian or the Marpi Landfill on Saipan. Refuse sent to the permitted Puntan Diablo Landfill would be limited to only the types of waste acceptable at a landfill permitted under the small community exemption and would thus not be anticipated to contribute to groundwater contamination.</p>
59G	<p>The EPA understands that PFAS has been detected in the drinking water on Tinian,(2) however, the Draft EIS does not discuss current levels of PFAS on-island nor the potential for contamination from the Proposed Action. While detected levels to date are below CNMI’s Maximum Contaminant Levels and EPA’s Primary Drinking Water Standard, discussion of the confirmed presence of PFAS on Tinian and any future military plans to utilize materials that contain PFAS would enhance groundwater planning and community disclosure.</p> <p><i>Recommendations:</i> In the Final EIS, describe current levels of known PFAS in groundwater on Tinian. Discuss past, current, and proposed military activities that use PFAS-containing materials that could contribute to PFAS contamination in the shallow groundwater, which is particularly susceptible due to highly permeable geology. Clarify the planned fire suppression approach on Tinian, including whether fire suppression foam would be used and, if so, the specific foam that is planned. Clarify whether any military munitions that would be used at the live-fire ranges contain PFAS.</p> <p>FOOTNOTE</p> <p>(2) See the 2022, 2023, and 2024 Tinian Drinking Water Quality Reports, which may be accessed at <a href="https://www.cucgov.org/reports/">https://www.cucgov.org/reports/</a>. EPA accessed these reports on 7/30/2025.</p>	<p>Information on the current known levels of PFAS in Tinian’s groundwater has been added to the Final EIS in Section 3.10 (Public Health and Safety) and 3.11 (Utilities). A description of the Range Environmental Vulnerability Assessment program and how the program would serve to monitor the potential for off range migration of munitions constituents at the ranges on Tinian has been added to the Final EIS in Section 4.10.3 (Public Health and Safety). The Range Environmental Vulnerability Assessment program includes conducting an assessment to gain a better understanding of the potential transport of munitions constituents and contaminants from the use of the proposed live-fire range areas. This assessment would include modeling worst case scenario for migration to off range areas including where pathways could reach groundwater. Additionally, a proposed management measure to conduct soil sampling prior to use of the live-fire ranges has been added to the Final EIS in Section 2.3 (Management Measures).</p> <p>In accordance with the National Defense Authorization Act for Fiscal Year 2020, and Marine Corps Administrative Order 185/24, the Marine Corps no longer uses Fluorinated Aqueous Film Forming Foam (AFFF) and Alcohol Resistant (AR-AFFF) Fire Suppression systems in Marine Corps Facilities. The military is committed to finding safer firefighting alternatives that do not harm the environment or human health.</p>

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59H	<p><i>Drinking Water System Disinfection Management</i></p> <p>The Draft EIS notes that the CUC drinking water system disinfects water using gaseous chlorine and that no other water treatment is necessary. The EPA understands that the CUC moved from gaseous chlorine to calcium hypochlorite briquettes for disinfection, primarily due to logistical challenges including issues transporting chlorine gas cylinders on and off Tinian. The Draft EIS does not describe the Marine Corps' proposed disinfection method for the new drinking water system.</p> <p><i>Recommendations:</i> The EPA recommends that the Marine Corps coordinate with the CUC to better understand the decision to discontinue use of gaseous chlorine and to consider using alternative disinfection methods due to potential public safety concerns and logistical challenges. In the Final EIS, clarify the disinfection method the Marine Corps intends to use. If chlorine, indicate the amount of chlorine that would need to be stored on island, the method and location proposed for storage, plans to monitor the storage site, preparation for potential emergencies, and plans for disposal of empty cylinders. Discuss whether chlorine storage would trigger the requirement for a Risk Management Plan under Clean Air Action Section 112(r). Describe how the Marine Corps would ensure that Range Control staff are adequately trained and prepared to respond to potential emergencies.</p>	<p>The Proposed Action has not reached the design stage for construction, including water treatment facilities or processes to support USMC drinking water needs for the Proposed Action. There are multiple commonly used methods of disinfection for potable water in the United States, and utilities often change methods based on economics and maintenance costs. The design and permitting process associated with drinking water facilities or processes would specify a disinfection method and permitting would be coordinated with the Commonwealth Utilities Corporation and the Bureau of Environmental and Coastal Quality. Appropriate analysis of environmental impacts for drinking water disinfection, including any analysis required by the Clean Air Action Section 112(r), will be conducted at that time. Section 4.11.3.1 (Utilities, Potable Water Supply) of the Final EIS has been updated to clarify the method of disinfection would not be determined until the design phase for this project.</p>
59I	<p><i>Wastewater Management</i></p> <p>The EPA provides several wastewater management recommendations to support needed project infrastructure and to protect the aquifer and coastal waters. We recommend additional evaluation of the proposed septic system and note concerns about potential impacts to the system from portable toilets and vehicle wash racks. We also describe critical concerns about the limited septic sludge disposal infrastructure on Tinian. Finally, we suggest the Marine Corps consider enhanced wastewater treatment options to protect Tinian's groundwater and coastal water resources.</p> <p><u>Wastewater Impacts</u> <i>Proposed Septic System</i></p> <p>The Draft EIS proposes to construct and utilize a new septic tank and leach field system at the Base Camp for Military Lease Area wastewater needs. The document provides general septic tank and leach field sizing based on CNMI wastewater regulations and notes that the system could include a sanitary sewer collection system, a sewer lift station, and one or more Individual Wastewater Disposal Systems (p. M-134). The Draft EIS does not provide further details,</p>	<p>The construction, operation, and maintenance of septic facilities would comply with all applicable laws and regulations. While the Proposed Action has not yet reached the design stage for construction, including wastewater treatment, the USMC would continue to coordinate with the Bureau of Environmental and Coastal Quality on appropriate methods and technology for wastewater treatment to obtain appropriate permits. Section 4.11.3.2 (Utilities, Wastewater Treatment) of the Final EIS has been updated to reflect that proposed septic systems would meet all applicable CNMI Bureau of Environmental and Coastal Quality regulations and the USMC is not proposing a system that would require compliance with the Underground Injection Control regulations cited in the comment (including CNMI Administrative Code Chapter 65-90).</p> <p>As noted in Section 4.11.3.2 (Utilities, Wastewater Treatment) of the Revised Draft EIS, the proposed site for the Base Camp site does not appear to be within either a Class I or II Aquifer Recharge Area/Groundwater Protection Zone on Tinian (CNMI Bureau of Environmental and Coastal Quality 2025). The ETR is located over impervious geology and thus not part of the Class I or II Aquifer Recharge Area/Groundwater Protection Zone. The MPMR is located outside of freshwater lens</p>

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	<p>such as the proposed location for the septic system or an analysis of whether the system may impact local groundwater or nearby coastal waters. The document does provide a map of popular dive sites (Figure 3.2-2), some of which appear to be directly adjacent to the Base Camp, as well a map of fishing and recreation locations (Figure 3.2-1), including locations southwest of the Base Camp. The Final EIS would benefit from additional context regarding the design and management of the septic system given Tinian’s highly permeable and karst geology and the potential to impact the freshwater lens and nearby coastal waters. From EPA’s review of the Draft EIS, it appears that the proposed septic system would be classified as a Large Capacity Septic System and would be subject to Class V Underground Injection Control (UIC) standards. We note that within the CNMI, BECQ has primacy for implementing EPA Class V UIC regulations.</p> <p><i>Recommendations:</i> Evaluate the ability of the proposed leach field to adequately treat effluent from the septic tank, as soil permeability must be appropriate to ensure proper treatment. Rather than relying on generally applicable CNMI septic tank regulations, describe the site- specific geology at the proposed septic system location and analyze potential impacts to local shallow groundwater, nearby coastal waters, and fishing and other recreation sites. Include a map of the proposed location of the septic tank and leach fields to support the analysis.</p> <p>Given the highly permeable geology and rapid groundwater recharge on Tinian, describe whether enhanced wastewater treatment options such as denitrification, subsurface flow constructed wetlands, or packaged wastewater treatment systems were considered to meet wastewater treatment needs in the Military Lease Area. Consider implementing enhanced treatment options to minimize impacts to groundwater and/or nearby coastal waters.</p> <p>Describe how the septic system would be designed, operated, and maintained to ensure that it can accommodate the planned variation in wastewater flow. The Draft EIS states that the wastewater infrastructure would be sized to accommodate peak flow, but that actual flow would vary significantly between training events and non-training periods, from as little as 1,500 gallons per day to as much as 53,000 gallons per day. (p. M-134). The EPA is concerned that, without proper system design and maintenance, septic systems do not always function adequately when subject to such variability in flow.</p> <p>Commit to completing a wastewater operation and maintenance manual for the Base Camp wastewater system ahead of site construction and operation to minimize potential environmental impacts and to ensure that the system is properly operated. In the manual, describe the approach to maintaining leach</p>	<p>(Appendix M, Groundwater TM Section 5.10). Accordingly, the proposed septic system would not significantly impact groundwater.</p>

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	<p>fields and regular septic sludge removal and describe how operations would incorporate other project waste streams into the septic system, such as vehicle wash water and portable toilet waste. Consider committing to a wastewater system operator position to further reduce potential environmental impacts.</p> <p>In the Final EIS, reference the CNMI UIC regulations found at CNMI Administrative Code Chapter 65-90 and describe how the Marine Corps would comply with these regulations.</p>	
59J	<p><i>Disposal of Wastewater from Portable Toilets</i></p> <p>The Draft EIS states that portable toilets would be used for construction activities as well as operations away from the Base Camp, and that septage from portable toilets would periodically be disposed of either at the new Base Camp septic system, the existing Navy Individual Wastewater Disposal system, or at a septage disposal site approved by BECQ (p. M-134-135). The EPA has concerns about the viability of the proposed disposal options, as there are no approved septage disposal sites on Tinian and the Draft EIS does not clarify whether the described Navy site is the Camp Tinian septic tank and leach field, which the Draft EIS notes is not currently in use (p. 3-83). Given this, it is also not clear where portable toilet waste would be disposed of before construction of the Base Camp system is complete. Further, the Draft EIS does not describe whether the proposed Base Camp septic system is designed to accommodate wastewater from portable toilets. We note that portable toilets can contain chemical additives that may harm septic system bacteria and impact their effectiveness.</p> <p><i>Recommendations:</i> Discuss in the Final EIS how the long-term use of portable toilets would comply with CNMI wastewater regulations found at CNMI Administrative Code Chapter 65-120. Clarify the planned location for disposal of portable toilet waste both before and after construction of the Base Camp septic system. If the Camp Tinian septic system would be used, even temporarily, describe any actions that must be taken to prepare the system for use. Ensure that a plan is in place for portable toilet disposal before implementation of the Proposed Action. Describe whether portable toilets used on Tinian may contain chemical additives and whether the disposal of portable toilet septage may decrease the effectiveness of the proposed Base Camp septic system.</p>	<p>Section 4.11.2 (Wastewater Treatment) of the Final EIS has been updated to clarify the existing Camp Tinian septic system would not be used to support the Proposed Action. The USMC agrees with the recommendation to comply with the CNMI Administrative Code Chapter 65-120 related to the disposal of portable toilet waste, as referenced in the comment. If there is no CNMI Bureau of Environmental and Coastal Quality-approved disposal location on-island, the septic sludge would be transported to an approved disposal location. Compliance with Bureau of Environmental and Coastal Quality regulations would address concerns related to chemical additives that may be present in portable toilet septage. The Final EIS has been updated to reflect this in Section 4.11.3.2 (Wastewater Treatment).</p>

<p>59K</p>	<p><i>Disposal of Septic Sludge</i></p> <p>The Draft EIS describes wastewater sludge generation as a form of solid waste (p. C-19), but septic sludge is not analyzed similarly to other solid waste streams. The document describes that septic sludge from the Base Camp septic tanks would be disposed of at a septage disposal site approved by BECQ and notes that septic sludge containing free liquids cannot be disposed of in the existing Puntan Diablo landfill or at the planned Atgidon Landfill (p. 4-123). The EPA notes that there are not currently any approved septage disposal sites on Tinian, and that the current temporary approach is to consolidate the community septic sludge into a larger system while awaiting future disposal (BECQ, personal communication, July 30, 2025). The Draft EIS appears to propose generation of a waste stream for which there is no approved disposal location on Tinian.</p> <p>Finally, the Draft EIS states that portable toilets and Base Camp septic tanks would be emptied by licensed septic haulers for disposal (p. M-134-135). From our ongoing waste conversations with the CUC, the EPA understands that licensed septic haulers are not consistently available on Tinian.</p> <p><i>Recommendations:</i> In the Final EIS, analyze septic sludge in the same manner as other solid waste streams included in the Solid and Hazardous Waste Study Update. Describe existing and planned waste disposal options on CNMI, expected waste generation from the Proposed Action, alternatives under consideration for waste disposal, and any infrastructure that would need to be developed by the Marine Corps to support the needs of the project.</p> <p>Describe the current septic sludge hauling and disposal practices on Tinian, including for DoD training operations and the current septic system at the proposed Base Camp location. Discuss the plan for septic sludge disposal if there continues to be no approved septage disposal site available on Tinian. Additionally, discuss the increased septic sludge disposal that would be required outside of the Military Lease Area based on population increases associated with the project, and any further strain this would place on the current septic sludge disposal capacity on Tinian.</p> <p>Commit that septic sludge would not be disposed of at unlined landfills without groundwater monitoring – these are permitted under the small community exemption available in Resource Conservation and Recovery Act (RCRA) Subtitle D regulations – nor consolidated temporarily into larger septic systems.</p> <p>Analyze the availability of licensed septic haulers on Tinian. Describe contingency plans for septic hauling should there be a lapse in availability of licensed haulers in the future.</p>	<p>The Final EIS has been updated to add information on the description of the proposed sludge disposal process in Section 4.11.3.2 (Wastewater Treatment). Wastewater service could be provided using portable toilets. These portable toilets would be periodically emptied and disposed of at a septage disposal site approved by the CNMI Bureau of Environmental and Coastal Quality per section 65-120-1405 (CNMI Administrative Code). Also, please see response to 59J above.</p> <p>Given the low-level of projected activity outside the Military Lease Area, mainly with limited construction activities, any additional waste is not anticipated to exceed current capacity.</p>
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59L	<p><i>Wastewater and Waste Oil from Wash Racks</i></p> <p>The Draft EIS describes vehicle and equipment wash racks associated with biosecurity facilities at the Port of Tinian and the Base Camp. The document states that wash racks would include oil-water separators, that material collected in the oil-water separators would be tested prior to determining appropriate disposition, and that wash water would be discarded in the Base Camp septic system (p. 2- 31, 33). The Draft EIS does not describe what materials would be used to wash vehicles and equipment and how wastewater disposal in the septic system may impact septic system functioning. The Draft EIS also does not describe how waste oil from the wash rack oil-water separators would be handled and disposed of. The EPA notes that discharging motor vehicle fluids into septic systems is not allowed as it would result in a banned Class V UIC motor vehicle disposal well.(3) The EPA further notes that receiving wastes other than sanitary waste may affect a septic system’s UIC classification, as the septic system may then meet the criteria of an industrial waste disposal well.(4)</p> <p><i>Recommendations:</i> Identify how vehicles and equipment would be washed, including any soaps, pesticides or solvents, and describe whether any substances used in the wash water may impact the functioning of the septic system. Describe how wash water would be properly managed to ensure that oils, grease, and hydrocarbons from wash stations do not enter the septic system or impact the groundwater.</p> <p>Describe the expected volume of waste oil and other vehicle fluids that would be generated from wash stations, and the planned disposition of waste oil from the wash rack oil-water separators, including whether this waste oil would require transport outside of CNMI as part of planned disposal of hazardous, industrial, and universal waste and e-waste streams. Describe whether disposal practices for wastewater from wash racks in the septic system meet the definition of a motor vehicle disposal well.</p> <p>Discuss potential impacts to UIC classification and permitting of the septic system if it is used to dispose of wastewater from vehicle and equipment wash racks. As part of this discussion, describe whether using the septic system for wash rack wastewater disposal is allowed based on BECQ Class V UIC regulations.</p> <p>FOOTNOTES</p>	<p>The wash rack system would be a water rinse; no soaps or solvents would be used. The designs for the wash rack are not complete for the port wash rack system. Section 4.11.3.1 (Utilities, Potable Water Supply) of the Revised Draft EIS stated, “Wash water would be contained during the washing cycle and recycled. Once the wash cycles are complete, any remaining wash water would be run through the oil water separator. Once the wash cycles are complete, wash water would be pumped out and disposed of in conformance with CNMI regulations. The oil/water separator would be periodically pumped out and disposed of in conformance with CNMI regulations for oily waste.” A discussion of Underground Injection Control classification and permitting for the septic system was not added to the Final EIS, as it is not proposed.</p>

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	<p>(3) U.S. Environmental Protection Agency. (2024, December 16). Motor Vehicle Waste Disposal Wells. <a href="https://www.epa.gov/uic/motor-vehicle-waste-disposal-wells">https://www.epa.gov/uic/motor-vehicle-waste-disposal-wells</a>. Accessed 7/31/2025.</p> <p>(4) U.S. Environmental Protection Agency. (2025, June 24). Large-Capacity Septic Systems. <a href="https://www.epa.gov/uic/large-capacity-septic-systems">https://www.epa.gov/uic/large-capacity-septic-systems</a>. Accessed 7/31/2025.</p>	
59M	<p><i>Solid Waste Management</i></p> <p>We commend the Marine Corps’ plan to create a Comprehensive Integrated Solid Waste Management Plan that considers the limitations as well as opportunities that a long-term project brings to a remote island location. We remain concerned with the low projected diversion rates of waste from ongoing and proposed training activities and the resulting amount of proposed waste disposal in CNMI, given the already strained solid waste resources. We recommend the Final EIS discuss current composition and disposal practices of all solid waste, including municipal solid waste, recyclables, and hazardous waste, from military activities on Tinian. We encourage the Marine Corps to create appropriate diversion infrastructure so that waste from project construction and operations is processed appropriately by the military and impacts to the environment are minimized.</p> <p><u>Solid Waste</u></p> <p>We appreciate the Marine Corps’ commitment to disposing of waste in appropriate waste streams (hazardous waste or ash to approved hazardous waste facilities, green waste to compost), as well as the commitment to source reduction, including direction to “mandate and enforce segregation and diversion of recyclables from the waste stream to minimize disposal” (p. M-157). Even with this commitment, the Draft EIS describes low projected diversion rates of waste generated from ongoing and proposed training activities. The solid waste disposal resources in the CNMI are already heavily strained and have limited capacity, including Tinian’s Puntan Diablo dump and Saipan’s Marpi landfill. The Tinian transfer station that currently processes recyclables for Tinian residents has limited capacity and financial resources. There are no hazardous waste disposal facilities located in CNMI.</p> <p><i>Recommendations:</i> We recommend the Final EIS discuss the current composition and disposal of all solid waste from military activities on Tinian, including municipal solid waste, recyclables, and hazardous waste, and use this information to plan for improved waste diversion. To meet or exceed the DoD goals of 40% diversion, commit to creating appropriate diversion infrastructure</p>	<p>Section 4.11.3.3 (Utilities, Solid Waste) of the Revised Draft EIS estimated the quantities of solid waste to be generated, and quantities of recyclables projected to be recovered. Impacts to the local landfills, if utilized, were evaluated in the Revised Draft EIS, but additional detail was added to the Final EIS related to potential impacts at Marpi Landfill. DoD policies mandate the proper segregation of materials, including recycling and disposal of solid waste in accordance with the rules and regulations of the jurisdiction in which it operates. Pursuant to DoD guidance, any waste management plan would require segregation of waste with appropriate segregation facilities.</p> <p>Refuse disposed at a permitted Puntan Diablo Landfill would be limited to only the types of waste acceptable at a landfill permitted under the small community exemption. According to the Revised Draft EIS, if a solid waste incinerator is used, the resulting incinerator ash would only be disposed of in a lined Resource Conservation and Recovery Act Subtitle D landfill. It also states that hazardous waste will be managed in accordance with hazardous waste regulations. Related to the proper disposal of septic sludge, please see the response above to 59J.</p> <p>Section 4.11.3.3 (Utilities, Solid Waste) of the Revised Draft EIS included a proposed management measure stating the USMC would commit to fund the regular transport of military training waste generated on Tinian to compliant landfills that are authorized to accept the waste, and these could include a future permitted landfill on Tinian or the Marpi Landfill on Saipan. The CNMI’s effort to permit the existing dump site at Puntan Diablo as a Small Community Exempt Landfill and the location and design of the potential future landfill site on Tinian is independent of the scope of the Proposed Action. The design, operation, and funding of a future landfill, including one for demolition and construction debris, are within the authority and responsibility of the local CNMI government. Any financial or technical assistance for a future landfill is outside the scope of the Proposed Action. However, DoD would collaborate with the CNMI on current and future waste management issues.</p> <p>As EPA notes, the current DoD Integrated Solid Waste Management policy sets a minimum diversion from landfilling or non-waste to energy incineration of 40 percent for non-hazardous waste, excluding construction and demolition debris (Office of the</p>

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	<p>in training areas on Tinian so that materials can be recovered efficiently and safely and to shipping recyclables off island to appropriate facilities that are not available on Tinian. Segregate waste into items for reuse, recycling, compost/green waste, construction and demolition debris, municipal solid waste, and hazardous waste. Clarify that all hazardous waste would be shipped to appropriate facilities outside of CNMI. Finally, to limit waste disposal in CNMI landfills, provide support to CNMI to ensure a separate site is available on Tinian for disposal of construction and demolition debris.</p>	<p>Assistant Secretary of Defense 2020). CJMT is unlikely to meet the 40 percent solid waste diversion goal due to the types of waste generated during expeditionary exercises such as pre-packaged food containers and its remote location, which has limited recycling services and no domestic consumption of diverted materials. Additionally, unlike day-to-day operations at a traditional installation, expeditionary training does not regularly include activities that generate certain waste streams which contain materials that are typically diverted (e.g., vehicle maintenance, kitchen/mess hall operations).</p>
59N	<p>The Draft EIS states that the Marine Corps would potentially send waste to Puntan Diablo after it is permitted under the small community exemption available in RCRA (p. M-167). We are concerned that increasing waste disposal at Puntan Diablo as it is working to achieve and maintain compliance may stress the limited capacity of that facility. Special considerations would need to be made to control the types and quantity of wastes that would be sent to a small community landfill like Puntan Diablo, which, even if it is permitted under the RCRA exemption, would remain unlined and would not have groundwater monitoring. This includes ensuring that incinerator ash, household hazardous waste, and septic sludge are not disposed of at such a facility. The Proposed Action would be an 85% increase in current average daily disposal tonnage at Puntan Diablo (p. M-169) which would reduce the operational life of the facility and potentially exceed daily operational capacity (see Table 20, p. M- 169). Plans to use small community exemption landfills for project-related waste should be temporary while DoD pursues permanent solutions.</p> <p><i>Recommendations:</i> Commit not to dispose of waste at Puntan Diablo landfill until the EPA ensures compliance is met and can be maintained at the landfill. If waste is sent to Puntan Diablo, commit to avoid exceeding its daily operating capacity. Assist with training and equipment to ensure that Puntan Diablo landfill operators are able to maintain compliance with permit conditions and requirements. Provide adequate Range Control staffing to ensure waste that is sent to Puntan Diablo meets all requirements for the facility. Commit that incinerator ash, household hazardous waste, and septic sludge would not be disposed of at small community landfills. In the Final EIS, analyze the potential for groundwater contamination due to placing DoD waste in an unlined facility without groundwater monitoring requirements. Use waste streams estimated from current operations on Tinian for this analysis. Consider, based on the waste streams that DoD would like to dispose of (including, potentially, munition-related disposal and septic sludge), whether it would be prudent for any future</p>	<p>The regulation and operation of the future permitted Puntan Diablo small community exempt landfill would be the responsibility of the CNMI government. The USMC would comply with all applicable statutes and regulations, and DoD policies. Also, see the response above to 59M.</p> <p>Section 4.11.3.3 of the Final EIS (Solid Waste) has been revised for clarity. The statement "an 85 percent increase in current average daily disposal tonnage at Puntan Diablo" addressed the peak daily increase. The Proposed Action's average daily disposal is estimated to be 1.36 tons/day which represents an increase of 35 percent from current average incoming tonnage. The 1.36 tons/day average plus current average daily tonnage of 3.9 tons equals approximately 5.3 tons/day which compares favorably with the average daily disposal tonnage at Puntan Diablo Landfill in recent past years. The proposed project would only utilize Puntan Diablo after it has achieved permitted status, would discharge only waste that is acceptable under the terms of the facility permits, and would work with the facility management to prevent exceedance of its permitted daily operating capacity.</p> <p>The design, operation, and funding of a future landfill are within the authority and responsibility of the local CNMI government. Any financial or technical assistance for a future landfill is outside the scope of the Proposed Action. However, DoD would collaborate with the CNMI on current and future waste management issues.</p>

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	landfills on Tinian to be lined. If so, consider supporting such developments financially and with technical assistance.	
59O	<p><u>Incinerator</u></p> <p>The Draft EIS suggests that incineration may be a waste disposal option (p. M-170-171), but does not include information about proposed incineration technology, estimated annual emissions, types of waste streams to be incinerated informed by past and ongoing Tinian operations, improved diversion practices to limit the need for incineration, and protocols for testing of incineration ash. We note that the Clean Air Act Section 129(e) requires all solid waste incineration units to have a title V operating permit. A pre-construction permit would also be required, either from the EPA or BECQ. Municipal Solid Waste incinerator ash is subject to RCRA Subtitle C when it exits the combustion building/unit and facilities generating municipal solid waste ash must determine whether the ash is hazardous.(5)</p> <p><i>Recommendations:</i> Provide information in the Final EIS about proposed incineration technology, estimated annual emissions, types of waste streams to be incinerated informed by past and ongoing Tinian operations, and protocols for testing of incineration ash. If an incinerator is pursued, we recommend the Marine Corps commit to thorough testing to determine whether ash is hazardous and avoiding disposal, even of non-hazardous ash, in unlined Tinian landfills (including Puntan Diablo and potentially Atgidon). Throughout the Final EIS, where BECQ is mentioned as the permitting authority, we recommend clarifying that the Marine Corps may also need a permit from EPA to ensure compliance with the Clean Air Act.</p> <p>FOOTNOTE</p> <p>(5) This determination is made by either testing using the Toxicity Characteristic Leaching Procedure (TCLP) (see 40 CFR Sec. 261.24) or by using knowledge of the combustion process to determine whether the ash would exhibit the toxic characteristics. Thus, DoD must determine whether the ash is hazardous prior to disposal. The February 3, 1995, Federal Register (pg. 6670) also discussed an expectation that non-hazardous MSW ash would be disposed in either a composite lined Subtitle D MSW landfill or a similarly lined monofill, and not to an unlined small community MSW landfill.</p>	<p>As described in Section 4.11.3.3 of the Revised Draft EIS (Utilities, Solid Waste), at this time an incinerator is an option under consideration should there be no local landfill disposal option available. An incinerator, if determined to be necessary, would be subject to the applicable environmental statutes, regulations, and permitting requirements. USMC would obtain all permits required under law prior to operating a solid waste incinerator and disposing of any waste byproducts.</p>
59P	<p><i>Unexploded Ordnance and Munitions Impacts</i></p> <p>We appreciate the Marine Corps' commitment to installing groundwater monitoring wells at the live-fire ranges and to establishing a monitoring plan in</p>	<p>All construction activities would follow established DoD and DON explosive safety and environmental requirements, including procedures for the identification of and response to any UXO encountered. Section 4.10.3 (Public Health and Safety) of the Final EIS has been updated to clarify that construction undertaken for the Proposed</p>

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	<p>collaboration with CNMI. We recommend close coordination in determining locations of the groundwater monitoring wells and also recommend sampling for potential contamination to coastal waters. We recommend the Final EIS analyze the potential for soil, groundwater, surface water, and coastal water contamination from the proposed live-fire ranges, incorporating information about proposed range configurations and local geology and hydrology. Finally, we urge DoD to ensure that a proper unexploded ordnance (UXO) detonation site is prepared and permitted before project construction begins to ensure that UXO found during project construction can be effectively managed in a way that minimizes environmental impacts. We recommend changing the planned construction phasing so that the Explosives Training Range is completed first and can be used for this purpose.</p> <p><u>Unexploded Ordnance and Munitions Constituents</u> <i>Disposal of Construction-Related Unexploded Ordnance</i></p> <p>The Draft EIS does not describe current DoD practices for the discovery and disposal of construction- related and other non-training related UXO on Tinian. Military munitions, including UXO, are regulated by RCRA as a type of hazardous waste where treatment, storage, and disposal may require a permit to ensure protection of communities and the environment. The EPA has learned from CNMI officials that UXO removal and detonation are occurring on Tinian, using at least two locations when UXO can safely be moved. As there are no RCRA-permitted UXO detonation sites on Tinian, these locations are not being monitored or sampled for environmental impacts, including to Tinian’s drinking water aquifer. The EPA is concerned that the Proposed Action would generate a hazardous waste stream with no permitted detonation site to safeguard against environmental impacts. While the Draft EIS confirms the need for construction-related UXO disposal by describing the Military Lease Area as having a medium-to-high probability of UXO (p. 3-76), the document does not describe a path forward for preparing and permitting an approved detonation site. The EPA notes that when non-training UXO cannot safely be moved to an approved location for destruction, emergency situations may occur where UXO must be destroyed in place using emergency permits or the immediate response exemption from RCRA.(6) The EPA is available to further coordinate regarding RCRA requirements for these emergency situations.</p> <p><i>Recommendations:</i> Describe the current processes for non-training related UXO discovery and disposal on Tinian. Discuss whether geophysical surveys are used in the current DoD construction process to facilitate the discovery of UXO. Describe how often UXO that is found during non-training activities is unsafe to transport to detonation locations and must be detonated in place. Evaluate the</p>	<p>Action would follow the response process laid out in Marine Corps Order 8020.10, Marine Corps Explosive Safety Response Program (June 10, 2025) for any UXO discovered during construction. The USMC is not proposing a separate UXO detonation site in advance of construction; however, any response to discovered UXO would be carried out in compliance with applicable safety and environmental regulations to minimize environmental impacts and comply with all regulatory requirements.</p> <p>Construction phasing would be prioritized by the military’s needs. Emergency response would be conducted in accordance with the Military Munitions Rule, which is part of the Resource Conservation and Recovery Act.</p> <p>Environmental effects from emergency UXO response is too speculative to analyze in this EIS due to the uncertainty of munitions encountered, locations, constituents, and underlying environmental conditions at the time of any emergency response.</p>

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	<p>potential environmental impacts associated with current non-training UXO disposal practices on Tinian.</p> <p>To ensure that UXO found during project construction can be effectively managed in a way that minimizes environmental impacts, we recommend the Final EIS includes a plan to prepare and permit a proper UXO detonation site before project construction begins. Consider constructing the Explosives Training Range first and permitting it for this purpose – this would have the added benefit of already planned groundwater monitoring to protect Tinian’s aquifer. In the Final EIS, include evaluation of the potential for environmental impacts associated with UXO disposal practices during project construction.</p> <p>Describe the process DoD would use to determine when non-training UXO would be addressed using emergency permits or the immediate response exemption rather than transportation to approved detonation locations. As part of this analysis, outline processes that would be used for detecting UXOs during construction to limit the need for emergency detonations, such as requiring geophysical surveys.</p> <p>FOOTNOTE</p> <p>(6) The Military Munitions Rule codifies standards applicable to emergency responses involving military munitions or explosives at 40 C.F.R. Section 266.204. Among these standards are expansions to RCRA exemptions for treatment or containment activities taken during immediate responses that address immediate threats. However, the EPA noted in the preamble to the Military Munitions Rule that “if an immediate response is not necessary to address the threat, and the response can be deferred, the responding personnel should seek a RCRA emergency permit under § 270.61.” See <a href="https://www.govinfo.gov/content/pkg/FR-1995-11-08/pdf/FR-1995-11-08.pdf">https://www.govinfo.gov/content/pkg/FR-1995-11-08/pdf/FR-1995-11-08.pdf</a>, accessed 8/12/2025.</p>	
59Q	<p><i>Live-Fire Range Contamination</i></p> <p>In addition to our recommendations for protecting the aquifer and coastal waters above, the EPA is concerned about the potential for munitions-related groundwater and coastal contamination. While the Draft EIS states that environmental risks associated with live-fire trainings may include soil and water contamination (p. 4-111), the document does not analyze the likelihood for contamination from the Proposed Action other than in a brief discussion about soil characteristics and migration of lead. The Draft EIS does not analyze other factors that may impact the migration of lead or other munitions</p>	<p>Potential impacts from munitions constituents were evaluated in Section 4.10 (Public Health and Safety) of the Revised Draft EIS. Based on the anticipated activities at the proposed live-fire ranges, the potential munitions constituents that may impact soil and water include energetic compounds (such as explosives), perchlorate, lead, copper, zinc, and potentially antimony. These constituents were selected for evaluation due to their expected presence in the types and quantities of munitions to be used. Other constituents, including per- and polyfluoroalkyl substances are not recommended for inclusion in the assessment, as they are not anticipated to be present.</p>

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	<p>constituents that have the potential to contaminate site soils and therefore surface water, groundwater, and coastal waters.</p> <p>The EPA notes that munitions constituents include a wide range of chemicals, each compound with its own potential to migrate to surface or groundwater and with different levels of toxicity. We note the potential sensitivity of the proposed live-fire range locations, as the Explosives Training Range would be located in the central portion of the aquifer where groundwater elevation is the highest (see Figures 2.1-1 and 3.13-1) and the Multi-Purpose Maneuver Range would be located near the coast in proximity to recreation sites, including Unai Lamlam (see Figures 2.1-1 and 3.2-1).</p> <p>Through correspondence with the Marine Corps,(7) the EPA was anticipating that the Draft EIS would include a description of literature reviews on the availability of lead, metals, and other munitions constituents in soil, surface water, and groundwater to support the finding of less than significant impact.</p> <p><i>Recommendations:</i> In the Final EIS, analyze the potential for soil and ground, surface, and coastal water contamination from the proposed live-fire ranges, incorporating information about the proposed live-fire range configurations as well as local geology and hydrology. Include the range of potential constituents that may impact soil and water based on the munitions that are reasonably expected to be used, including an assessment of the need to include PFAS in this analysis.(8) Include an appendix with the literature review conducted by Marine Corps.</p> <p>Describe whether the regular refilling of craters at the Explosives Training Range (p. 4-135) would result in the burial of munitions constituents and potentially facilitate migration into the groundwater. Additionally, describe whether planned surface water best management practices – such as sediment basins and diversion swells – could further concentrate munitions constituents and provide a pathway to groundwater. Discuss whether regular remediation of these areas would be needed to address contamination.</p> <p>Describe the potential for low-order detonations,(9) to affect quantities of explosive residues that remain on soils in live-fire ranges. Include information from relevant studies on the estimated frequency of low-order detonations for military munitions, training-related UXO detonations, and insensitive munitions.(10)</p> <p>FOOTNOTES</p> <p>(7) 7 L. Graham, personal communication, April 30, 2025.</p>	<p>The potential for groundwater contamination was addressed in the Revised Draft EIS (see Sections 4.10, 4.11 and 4.13). As described in Section 4.10.3.1 (Public Health and Safety, Ground Training), lead is the primary contaminant of concern for the Multi-Purpose Maneuver Range, along with the disposition of small amounts of munitions constituents from ordnance use at both live-fire ranges. The primary condition that would influence the movement or mobility of lead or other metals, such as copper, in an environment is the pH of the soil. The geology of Tinian is predominantly karst, and the soils are derived from limestone bedrock with abundant carbonates and are naturally neutral (pH 6.5–7.0) to alkaline (greater than 7.0). At neutral pH, heavy metals, like lead, become relatively insoluble and the potential for lead to be transported to the ground water or in surface water runoff would be very low (Weil and Brady 2017). Because of the relative scarcity of surface waters on Tinian, best management practices, stormwater management systems, and the natural adsorption of Tinian’s soils, construction and training under the Proposed Action would have less than significant impacts on groundwater. Range Control would enforce range clearance procedures to ensure hazardous materials are removed and to ensure the long-term safety and sustainability of the live-fire ranges. At the conclusion of training, units are required to conduct an initial sweep to clear training-related debris, including spent brass, target remnants, and packaging waste, restoring the range to a safe condition.</p> <p>Additionally, a description of the Range Environmental Vulnerability Assessment program and how the program would serve to monitor the potential for off range migration of munitions constituents at the ranges on Tinian has been added to the Final EIS in Section 4.10.3 (Public Health and Safety). The Range Environmental Vulnerability Assessment program includes conducting an assessment to gain a better understanding of the potential transport of munitions constituents from the proposed live-fire range areas. This assessment would include modeling worst case scenario for munitions constituents migration to off range areas including where pathways could reach groundwater.</p> <p>A proposed management measure to conduct soil sampling prior to use of the live-fire ranges has been added to the Final EIS in Section 2.3 (Management Measures).</p> <p>The USMC is not planning to use fire suppression foam containing PFAS as part of the Proposed Action (only water).</p> <p>Refilling craters on the Explosives Training Range is a standard operating practice. The Range Environmental Vulnerability Assessment program would be able to predict the migration of explosives and metals into groundwater and migration to off-range areas. Surface water best management practices would be utilized to manage</p>

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	<p>(8) U.S. Department of Defense. (2023). Report on Critical Per- and Polyfluoroalkyl Substance Uses. <a href="https://www.acq.osd.mil/eie/eer/ecc/pfas/docs/reports/Report-on-Critical-PFAS-Substance-Uses.pdf">https://www.acq.osd.mil/eie/eer/ecc/pfas/docs/reports/Report-on-Critical-PFAS-Substance-Uses.pdf</a>. Accessed 8/4/2025.</p> <p>(9) Studies show that when a round malfunctions and a high-order detonation is not achieved, it can deposit residues and contaminate an impact area as much as 100,000 properly functioning rounds. Walsh, M. R., Walsh, M. E., Poulin, I., Taylor, S., &amp; Douglas, T. A. (2011). Energetic residues from the detonation of common US ordnance. <i>International Journal of Energetic Materials and Chemical Propulsion</i>, 10(2), 169–186. <a href="https://doi.org/10.1615/intjenergeticmaterialschemprop.2012004956">https://doi.org/10.1615/intjenergeticmaterialschemprop.2012004956</a>.</p> <p>(10) Insensitive munitions appear not to consume all energetic contents, but instead deposit residue even when detonated. Walsh, M., Thiboutot, S., &amp; Gullett, B. (2017). Characterization of Residues from the Detonation of Insensitive Munitions. <a href="https://apps.dtic.mil/sti/citations/AD1053694">https://apps.dtic.mil/sti/citations/AD1053694</a>. Accessed 8/4/2025.</p>	<p>munitions constituents. The text of Section 4.10.3 (Public Health and Safety) in the Final EIS has been updated for clarity.</p>
59R	<p><i>Live-Fire Range Monitoring</i></p> <p>The EPA commends the Marine Corps’ commitment to installing groundwater monitoring wells at each of the live-fire ranges and to establishing a monitoring plan in collaboration with BECQ (p. 2-43). Robust baseline and regular groundwater sampling and monitoring is essential to detect munition constituent releases and to support immediate actions to protect the aquifer at the live-fire ranges. We note that groundwater monitoring data may also help to validate or refine modeling that would be conducted under the Range Environmental Vulnerability Analysis (REVA) program.</p> <p><i>Recommendations:</i> Coordinate closely with BECQ to determine the locations of the groundwater monitoring wells and the sampling and analysis approach. Include explosives, metals, perchlorates, volatile organic compounds, and any other constituents specific to munitions used at the ranges. Install monitoring wells and conduct baseline groundwater monitoring before beginning operation at the ranges. Conduct baseline and regular monitoring and sampling of nearshore springs or groundwater seeps near the Multi-Purpose Maneuver Range to detect releases to coastal waters. If monitoring indicates that munitions constituents have impacted groundwater or spring water, commit to immediately notifying BECQ, CUC, and EPA and initiating prompt discussions on mitigation measures or other next steps.</p>	<p>The DoD would install up to four groundwater monitoring wells at each of the two live-fire ranges, establish a water monitoring plan, and include one year of baseline monitoring before ranges would become operational. The locations of wells would be determined in collaboration with CNMI Bureau of Environmental Quality. Table 2.3-1 (Proposed Management Measures) in the Final EIS has been updated to provide clarity on proposed groundwater monitoring wells at the live-fire ranges.</p>

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	<p>We recommend that the maximum number of groundwater monitoring wells not be predetermined. When determining the number of wells and their location, analyze the local geology and hydrology, configuration of the ranges, including size, elevation, and operational approach, and range locations in relation to coastal recreation sites and the groundwater aquifer. Consider conducting dye-trace studies to confirm hydrogeological connection to the wells after well installation.</p>	
59S	<p><i>Range Environmental Vulnerability Assessment</i></p> <p>The Draft EIS briefly describes the proposed REVA implementation on Tinian. This includes conducting a baseline survey before initial use of live-fire ranges followed by operational assessment modeling after one year of operations and then every five years (p. 4-112 and D-25). The EPA supports the Marine Corps’ goals for the REVA program to be a proactive and comprehensive approach to ensure the environmental sustainability of operational ranges and to successfully mitigate environmental impacts from active ranges (p. 2-27). The EPA continues to have concerns with the traditional REVA approach, which relies on periodic modeling to determine the potential for environmental impacts outside of ranges but does not always act on model results, depending on whether relevant “pathways and receptors” for contamination are determined to exist near ranges. In addition to the inclusion of live-fire range groundwater monitoring, there are several opportunities to enhance the REVA approach on Tinian to improve collaboration with local partners and support sustainable use of the ranges.</p> <p><i>Recommendations:</i> We recommend the Final EIS include a commitment to conduct initial surface and shallow subsurface sampling at the live-fire ranges as part of the baseline survey.</p> <p>Describe in the Final EIS what constituents would be modeled by the REVA program and include explosives, metals, perchlorates, volatile organic compounds, and other constituents specific to munitions used at the ranges. As the Draft EIS states that the entire Military Lease Area would be designated as a “range complex” (p. 1-7), clarify the boundaries of each range for the purposes of determining what would be considered migrating “off-range.” Disclose the pathways and receptors that would be considered in the REVA process, noting whether there are any on Tinian that would prompt action if the model determined that contamination may be migrating off-range. Finally, to support public disclosure and collaboration with CNMI partners, discuss specific actions</p>	<p>The Range Environmental Vulnerability Assessment program includes conducting an assessment to gain a better understanding of the potential transport of munitions constituents from the proposed live-fire range areas. The program assesses potential migration of munitions constituents found on USMC ranges, which includes explosives constituents, ammonium and potassium perchlorate, and metals. Among the explosive munitions constituents, Range Environmental Vulnerability Assessment focuses on TNT (2,4,6-trinitrotoluene), HMX (octahydro-1,3,5,7-tetranitro-1,3,5,7-tetrazocine), RDX (hexahydro-1,3,5-trinitro-1,3,5-triazine), and their respective degradation and breakdown products. Metals associated with ammunition commonly used at operational ranges include lead, antimony, copper, and zinc. Range Environmental Vulnerability Assessment focuses on lead as the munitions constituents indicator. Lead is primarily associated with small arms military munitions and is the most prevalent metal found in soils on operational ranges. These analytes are consistent with the munitions proposed for use on the Tinian ranges covered by the Revised Draft EIS. Baseline soil sampling will be conducted prior to range operations.</p> <p>The “off range” area is considered as the area outside the range footprint on land (the boundaries shown for the Multi-Purpose Maneuver Range and Explosives Training Range and their respective surface danger zones). If munitions constituents are determined to migrate off range, either the Operational Range Clearance process or Comprehensive Environmental Response, Compensation, and Liability Act process would be followed as appropriate. Section 4.10.3 (Public Health and Safety) of the Final EIS has been updated for clarity.</p>

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	<p>the Marine Corps would take if the REVA model found that munitions constituents were likely to migrate outside of the live-fire ranges.</p>	
60A	<p>The Tinian Leadership recognizes the Department of Defense’s (DOD) efforts to complete the Revised EIS for the CJMT project on Tinian. Moreover, the people of Tinian acknowledge the importance of the proposed training to ensure military readiness in our region.</p> <p>Over the past 5 years, the Municipality of Tinian has built a strong partnership with DOD through mutual respect, transparency, and an understanding of Tinian’s most critical concerns. These concerns focus on the protection of the environment, creation of employment and business opportunities, transparency and accountability, and respect for our culture and way of life.</p> <p>The Tinian Leadership believes DOD has made huge strides in developing a training program on Tinian that balances the need of national security with the economic, environmental, and cultural needs of the indigenous people.</p> <p>Therefore, the Tinian Leadership supports DOD’s plans to move forward with the CJMT training plans as long as DOD continue to prioritize the implementation of mitigation measures to prevent evasive species from entering Tinian, develop systems to prioritize local businesses for DOD contracts, minimize restricted areas that may interfere with subsistence fishing and commercial tourism, and continue community relation projects to benefit the Tinian community.</p>	<p>The USMC appreciates the collaborative working relationship with the Municipality of Tinian. As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. Range Control would also work with the Municipality of Tinian to identify in advance any holidays, festivals, or other important days for which public access is needed. Range Control may adjust range management strategies based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p>
61A	<p>Public Access and Coordination (EIS Section 4.1)</p> <p>The EIS states that Alternative 1 would require "additional coordination and consultation" with the CNMI stakeholders. This should be a binding requirement for all action alternatives and should include:</p> <ul style="list-style-type: none"> <li>• Avoiding SDZ closures during fishing tournaments, traditional voyages and other cultural and community events.</li> <li>• Publishing an annual training calendar with tentative closure dates and providing real time updates for schedule changes. Establishing a minimum 30-day notice period for planned closures.</li> <li>• Post Notices to mariners in Saipan, Tinian and Rota.</li> <li>• Include Guam mariners in notifications for CNMI-area closures.</li> <li>• Disseminate closure notices via email, social media, news services.</li> <li>• Recognizing that not all residents have reliable internet or smartphones, traditional outreach methods are also essential. These include printed notices at agency bulletin boards, fishing supply stores, local shops and</li> </ul>	<p>Section 4.1 (Public Access) of the Revised Draft EIS outlines measures such as advance public notice, use of multiple communication channels, and coordination with local agencies and mariners to reduce conflicts with fishing, cultural, and community activities.</p> <p>For training scheduling purposes, the Military Lease Area would be divided into eight smaller, separate training areas allowing safe public access in areas where training activities would not be occurring. During some training events, public access may be limited for the safety of the public and service members participating in the training. However, when possible, public access to recreational beaches, tourism areas, and the North Field National Historic Landmark would continue to be available to the local community and tourists even when training may be occurring. Some training could be conducted without any access controls.</p> <p>As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community will have advance notice of where, when, and how long</p>

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	<p>markets, and announcements on AM radio to reach elders and rural communities.</p> <ul style="list-style-type: none"> <li>Establish a community advisory committee to integrate traditional ecological knowledge into scheduling decisions.</li> </ul> <p>Given that the multipurpose range at the northern tip of Tinian could trigger SDZs extending up to 3 miles offshore (Figure 2.1-9), coordination with local government agencies, NGOs, fishing clubs, air and sea transport companies, and local media is important. Closures may force fishers to travel farther offshore or around the island’s east side, increasing fuel costs and safety risks, especially during inclement weather.</p>	<p>training would occur. Range Control would also work with the Municipality of Tinian to identify in advance any holidays, festivals, or other important days for which public access is needed. Range Control may adjust range management strategies based on community tradition, knowledge, and experience into new information to improve outcomes as needed (i.e., utilize adaptive management). Given the above, there is no plan to establish a separate advisory committee.</p>
61B	<p>Land Use and Recreation (EIS Section 4.2)</p> <p>This section should explicitly recognize the importance of the northern Tinian waters for spearfishing and commercial harvests transported to Saipan. As this area is an important fishing ground for providing fresh seafood to both Tinian and Saipan, closures should be avoided during “good fishing days” that are determined by the lunar calendar, wind condition and community input.</p>	<p>Section 4.2 (Land Use and Recreation) and Section 4.3 (Socioeconomics) of the Revised Draft EIS evaluates potential effects of proposed training on commercial and subsistence fishing, including spearfishing and harvest activities in northern Tinian waters. The analysis notes that temporary closures of specific offshore areas would occur only when required for safety during scheduled training and that advance public notice and coordination with local agencies would be provided. While the Revised Draft EIS does not set training schedules by lunar calendar or weather conditions, the USMC would work with CNMI resource agencies and the fishing community to provide timely information to minimize conflicts with important fishing periods to the extent practicable.</p>
61C	<p>Socioeconomic Impacts (EIS Section 4.3)</p> <p>The EIS acknowledged that "Temporary activation of surface danger zones in waters north of Tinian during live-fire training at the Multi-Purpose Maneuver Range could significantly affect fishing and boating, as boaters may have to travel longer distances when the surface danger zone is active." Mitigation measures should include:</p> <ul style="list-style-type: none"> <li>Working with local stakeholders to identify low-impact training windows to fishers and mariners;</li> <li>Providing fuel-cost offset or alternative harbor access (e.g., adding boat ramps on the opposite side of Tinian, repairing the Sugar Dock boat ramp on Saipan, new fishery facilities, etc.) as closures are anticipated to cause rerouting.</li> </ul>	<p>As described in Table 2.1-1 and Section 2.1 (Proposed Action) of the Revised Draft EIS, small training events of up to 100 personnel may occur routinely throughout the year, generally lasting one to two weeks each. These training events include pre-live-fire activities (e.g., planning, rehearsal, and setup), a limited period of live-fire training, and post-training activities (e.g., recovery and debrief). Use of the surface danger zones associated with the Multi-Purpose Maneuver Range would be temporary and only active during the periods when live-fire training is conducted and would not remain active for the full duration of a training event. The surface danger zone would be deactivated immediately following completion of live-fire activities. Range Control would issue advance public notifications prior to surface danger zone activation and ensure access restrictions are lifted promptly once live-fire training concludes. There is no legal authority to compensate mariners for extra travel due to the establishment of the surface danger zone; however, the USMC is committed to minimizing disruptions by providing timely public notification (via U.S. Coast Guard Notice to Mariners and other channels), as described in Section 2.1.6.2 of the Revised Draft EIS.</p>

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		<p>To further offset the significant impact to subsistence fishers, the Final EIS has been updated in Table 2.3-1 to include the following proposed management measure:</p> <ul style="list-style-type: none"> <li>The DoD would work with CNMI to identify federal programs or funding sources needed to support the siting and installation of fish aggregating devices to offset the impacts to subsistence fishers.</li> </ul> <p>As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. Range Control may adjust range operating procedures for communication based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p>
61D	<p>Biological Communities (EIS Section 4.4)</p> <p>While the EIS states projectiles will not enter the water, mitigation should be in place in case of accidental impacts. The Navy should fund baseline and post-training surveys coordinated with local agencies (e.g., the Division of Fish and Wildlife, Division of Coastal Resource Management). Related surveys include detecting changes in reef health, fish abundance, habitat conditions, etc. Funding aquaculture/restocking programs to offset access losses will benefit the fishing community.</p>	<p>As noted in Section 4.4.3.4 (Marine Communities) of the Revised Draft EIS, all proposed training activities would be conducted entirely on land. However, portions of the designated surface danger zone associated with the Multi-Purpose Maneuver Range would extend over adjacent coastal waters. USMC ranges are intentionally designed to minimize the likelihood of projectiles leaving the primary target area. Data from operational assessments and range clearance programs consistently show that nearly all projectiles remain within the land-based portion of the target area. This high level of containment is the result of several safety and design measures: all weapons and ammunition used meet strict DoD standards for performance and accuracy; every operator is certified on their weapon; the firing positions and target locations are arranged to ensure rounds remain within the intended land area; and targets are constructed with materials that help reduce the chance of ricochets.</p> <p>To offset the significant impact to subsistence fishers, the Final EIS has been updated in Table 2.3-1 to include the following proposed management measure:</p> <ul style="list-style-type: none"> <li>The DoD would work with CNMI to identify federal programs or funding sources needed to support the siting and installation of fish aggregating devices to offset the impacts to subsistence fishers.</li> </ul> <p>The USMC is consulting with the National Marine Fisheries Service under the Magnuson–Stevens Fishery Conservation and Management Act regarding potential impacts to marine life and essential fish habitat, and consulting with the U.S. Fish and Wildlife Service under the Endangered Species Act for federally listed species. These consultations will be complete and incorporated, as appropriate, into the Record of Decision.</p>

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61E	<p>Regulatory and Jurisdictional Concerns</p> <p>50 CFR § 665.404(a)(2) requires commercial bottomfish vessels to attain federal permits in order to fish in the EEZ. Local CNMI Commercial Fishing Recording &amp; Reporting Regulations (Title 85, § 85-30.5) also requires individuals or businesses who commercially harvests, purchase or sell marine life within CNMI waters to obtain a valid license. The fishing community has expressed concern that the designation of the Military Lease Area Range Complex on Tinian could lead to its reclassification under federal jurisdiction, which may require bottomfishers to obtain both federal permits and CNMI licenses to operate near Tinian and Saipan.</p>	<p>The establishment of live-fire ranges on Tinian would not lead to new permit or licensing requirements for fishermen or boaters; 50 CFR 665.404 (a)(2) refers to the boundary of the CNMI management subarea which is not redefined by the Proposed Action.</p>
61F	<p>Environmental Monitoring and Data Integration</p> <ul style="list-style-type: none"> <li>• Incorporate data from recent 2025 NOAA and Ocean Exploration Trust cruises to identify and protect deep-sea coral, seamounts, hydrothermal vents and other sensitive habitats;</li> <li>• Expand marine mammal monitoring to include continuous passive acoustic systems and share results with local and regional partners;</li> <li>• Avoid training during critical spawning periods in marine life;</li> <li>• Annual public reporting of marine monitoring data conducted by the Navy that is easily accessible by the public;</li> <li>• The EIS should acknowledge that training impacts from Tinian, Pagan and FDM combined could have regional-scale effects on migratory species and fisheries.</li> </ul>	<p>Given that the Proposed Action is limited to land-based activities, the mitigation suggested in the comment are outside the scope of the Proposed Action effects. Indirect impacts to marine environment are evaluated in Section 4.4.3 of the Revised Draft EIS. As noted above in the response to 61D, the USMC is consulting with the National Marine Fisheries Service under the Magnuson–Stevens Fishery Conservation and Management Act and the Endangered Species Act regarding potential impacts to marine life and essential fish habitat. The consultation will be complete and incorporated, as appropriate, into the Record of Decision.</p>
63A	<p>The clearance of the four runways has killed trees that have been a part of our forestry some of which were medicinal herbs still practiced by our people. The federal government through a grant, has made available \$1.6 million over 3-year period for reforestation effort CNMI-wide. Reforestation plan saw a small area within the proposed Firing Range in Pina that has since been relocated to a rocky area where medicinal plants will certainly not thrive. Firing range in Vieques of Puerto Rico after being used for years have not produced fertile soil for any meaningful agricultural activities.</p>	<p>Clearance of the North Field runways was conducted under a separate action by the U.S. Air Force and is not part of the USMC Proposed Action. In addition, information on past grants is outside the scope of the Proposed Action.</p> <p>The Revised Draft EIS evaluates impacts on vegetation and traditional plant resources and includes measures to avoid, minimize, and restore disturbed areas where practicable (see Section 4.4, Biological Resources, Section 4.5, Cultural Resources, and Section 4.2, Land Use and Recreation).</p>
63B	<p>Firing range as I understand, will see use of high-powered weapons inclusive of live missiles. Chemicals associated with these types of ammunition are highly toxic to our water, our air, any reforestation effort and most importantly to the people that lives on Tinian particularly those living in Marpo Valley closest to the Firing Range. Accumulation of toxic chemicals will increase over time and will be at a very toxic level at some point in the future exacerbated by what's</p>	<p>The Proposed Action does not include the use of live missiles. As described in Chapter 2 of the Revised Draft EIS, live-fire training on Tinian would be limited to small-arms weapons and explosives, with explosives restricted to 40 pounds net explosive weight or less at the Explosives Training Range. No missile systems would be fired. While the Revised Draft EIS identified High Mobility Artillery Rocket System (HIMARS) as</p>

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	<p>already in the ground from WWII. This has been the experienced of Ewa Beach in Hawaii. Initial tests of soil, air and water should be done by the military to determine baseline data. Such data must be made available to the CNMI government so that follow-up on a periodic basis for testing of ground, water, air and shorelines.</p>	<p>a potential training system, its use would be limited to dry-fire training only, with no live rockets, propellant, or missile fuel employed.</p> <p>Potential environmental effects associated with proposed live-fire activities were evaluated in the Revised Draft EIS. The DoD would install up to four groundwater monitoring wells at each of the two live-fire ranges, establish a water monitoring plan, and include one year of baseline monitoring before ranges would become operational. The locations of wells would be determined in collaboration with CNMI Bureau of Environmental Quality. In addition, as described in Section 2.1.8.2 of the Revised Draft EIS, Range Control would implement Marine Corps Order 3550.12A, the Operational Range Clearance Program, to ensure the long-term safety and sustainability of live-fire ranges. This program includes periodic clearance of spent munitions, debris, and residues resulting from training activities. A Range Environmental Vulnerability Assessment would be conducted one year after each live-fire range begins operations and reassessed every five years in accordance with DoD Instruction 4715.14, Operational Range Assessments. This program serves as a proactive and comprehensive approach to ensure the environmental sustainability of USMC operational ranges. It aims to mitigate environmental impacts from active ranges and complies with the requirements outlined in DoD Instruction 4715.14.</p>
63C	<p>The impact to our people will be significant as the island population such that it is vulnerable to any outside forces that the troops will impose. Businesses will take the opportunities it presents to establish bars and other adult entertainment in an unregulated (absence of zoning) growth. Elected leaders have not addressed any of such issues. Release of a thousand troops will see the increase in cultural conflicts that were, being experience now to be negative and will be sources of confrontations.</p>	<p>The USMC is proposing to establish an expeditionary training environment on Tinian with a small supporting Base Camp. The Base Camp would reuse existing structures at the U.S. Agency for Global Media site instead of constructing a new facility on Tinian. Outside of major training events, the Base Camp would support approximately 30 to 50 full-time personnel. Training units would arrive at the Military Lease Area to conduct training and leave after the training is completed. There would be no permanent training unit presence on the island.</p> <p>All military personnel scheduled to train in the CNMI receive pre-deployment and on-island briefings that emphasize cultural awareness, protection of wildlife, and compliance with environmental regulations. These requirements would be reinforced through unit-level training, Range Control procedures, and environmental protection protocols. The intent is to ensure that all personnel conduct themselves in a manner that respects the people, culture, and natural resources of the CNMI while carrying out training activities. DoD service members are held to a high standard of conduct, and the DoD would act promptly and rigorously to curtail any misconduct and enforce laws to protect citizens.</p>

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63D	<p>We need for our elected official to read and truly analyze the impact without depending on the analysis done by the military people. I really believe there is also a “psychological warfare” going on to convince our people by creating confusion, creating stress and pressure from all these EIS that must be reviewed one right after another.</p> <p>These reports are so massive that I can’t understand what they are trying to say. I need to hear it from our own people as to what is really going to happen. We need to have it written in Chamorro with at least 90-day review time. We need help from our elected people to support and create opportunities to gather and really discuss what the report (EIS) is trying to tell us. These leaders are very, very quite....I wonder what is going on.</p> <p>I think there is so much more than what is written....the (military) made so many offers and changes that we cannot catch up with them. I know that what they say and what actually happens never matched. The report must be thoroughly explained to our people in smaller group setting and that discussions and questions are encouraged. A 2-hour public meeting is not adequate as we don’t know enough English to discuss issues from the Rvvd. CJMT. It’s doubly difficult given the document is all in English.</p>	<p>In developing this Proposed Action, the USMC evaluated the changes in the way U.S. Armed Forces currently prepares for future conflicts and carefully considered the comments and suggestions submitted on the 2015 Draft EIS/OEIS by elected officials and government agencies of the CNMI, federal agencies, the public, and collaborative interagency coordination. The USMC’s proposed training concept for the Military Lease Area on Tinian recognizes the importance of minimizing the impacts of military training on the residents of Tinian. First, the training concept was purposefully designed to locate live-fire ranges within the northern portion of the island, away from the village of San Jose, recreational beaches, tourism areas, and cultural and natural resources. Second, understanding that public access to the Military Lease Area was important to the community, the Marine Corps identified the establishment of an on-island Range Control to facilitate communication between the community and military to allow access to the Military Lease Area when it could be safely accommodated, even during ongoing training events.</p> <p>After developing this training concept, the Marine Corps engaged the CNMI government in a series of virtual and in-person discussions on a revised training concept and revised environmental analysis between January 2020 and September 2024. In August 2023, the USMC held public information sharing sessions on the islands of Tinian, Saipan, and Rota to inform the public at large of the revised training concept.</p> <p>To encourage the sharing of information and discussion with the public, the USMC held the public meetings in June 2025 for the Revised Draft EIS in an open house format. Each poster station presented the analysis of a key resource, and a representative was available to answer questions. Chamorro and Carolinian version translations of the fact sheet were available at the public meetings and on the project website. The Executive Summary in these languages was also made available to download from the project website and printed copies were available for review at the local libraries on Tinian, Saipan, and Rota. Additionally, the USMC held office hours in August 2025 at the Commonwealth Bureau of Military Affairs Tinian Field Office to provide an opportunity for additional public engagement prior to the end of the public comment period.</p>
64A	<p>Our culture, very different from that of the typical American, will see confrontations, confusions and “misreading” of gestures and behaviours. I don’t see any attempt or plans to address this particular issue. Okinawa had a very bad experience with military men perpetrating crime against women and children. These crimes were not of minor offense rather severe and serious ranging from rapes as well as murders. It took Okinawa a long time to have this issue addressed as I believe their national government was somewhat more concern</p>	<p>The USMC is proposing to establish an expeditionary training environment on Tinian with a small supporting Base Camp. Outside of major training events, the Base Camp would support approximately 30 to 50 full-time personnel. Training units would arrive at the Military Lease Area to conduct training and leave after the training is completed. There would be no permanent training unit presence on the island.</p> <p>Analysis in Section 4.3.3 of the Revised Draft EIS concluded that impacts on community services would be less than significant. All military personnel scheduled to</p>

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	<p>of how such issue would impact the Japanese-American relationship and/or treaty. I have not heard of any discussions similar to this issue and its impact on the U.S.-CNMI Covenant. At what price should we sacrifice our women and children.</p> <p>As an ex-law enforcement officer, there is inadequate number of police officers to ensure the community will have and maintain reasonable level of safety and that they are qualified, trained, and fit to respond.</p>	<p>train in the CNMI receive pre-deployment and on-island briefings that emphasize cultural awareness, protection of wildlife, and compliance with environmental regulations. These requirements would be reinforced through unit-level training, Range Control procedures, and environmental protection protocols. The intent is to ensure that all personnel conduct themselves in a manner that respects the people, culture, and natural resources of the CNMI while carrying out training activities. DoD service members are held to a high standard of conduct, and the DoD would act promptly and rigorously to curtail any misconduct and enforce laws to protect citizens.</p>
64B	<p>Adult entertainment will naturally follow military bases as we see it with bases elsewhere in the country as well as those in foreign countries. Naturally the business community will go where there is some economic benefit. There have been no discussions on how the elected people will begin to address some degree of orderly growth. Are we going to see adult entertainment within the village where families reside? The military have their EIS.....where is our Socio-Economic plans to mitigate all these activities?</p> <p>The cost of social disruptions will be enormous and expensive. No one is talking about funding to address law enforcement, orderly growth, traffic, noise pollution, contaminated soil, water, air and sea and how restrictions on access will impact on our livelihood.</p> <p>I am a parent and I am concern because Tinian will no longer be the peaceful and quite place to raise families.</p>	<p>The USMC is proposing to establish an expeditionary training environment on Tinian with a small supporting Base Camp. Outside of major training events, the Base Camp would support approximately 30 to 50 full-time personnel. Training units would arrive at the Military Lease Area to conduct training and leave after the training is completed. There would be no permanent training unit presence on the island.</p> <p>All military personnel scheduled to train in the CNMI receive pre-deployment and on-island briefings that emphasize cultural awareness, protection of wildlife, and compliance with environmental regulations. These requirements would be reinforced through unit-level training, Range Control procedures, and environmental protection protocols. The intent is to ensure that all personnel conduct themselves in a manner that respects the people, culture, and natural resources of the CNMI while carrying out training activities. DoD service members are held to a high standard of conduct, and the DoD would act promptly and rigorously to curtail any misconduct and enforce laws to protect citizens.</p>
65A	<p>Classroom Instructions</p> <p>Our experiences covered period of time when there were no military training activities to the time when the U.S. Marine are on island engaged in different training activities. We were teaching when jet fighters would fly in and out, training of the young Marines in mock war games with the use of helicopters, night time training activities as well as different times of the day.</p> <p>During training, we often had to stop instructions and other student learning activities because of the noise from helicopters, jet fighters and other aircrafts. Students would stop learning activities and start talking about the noise and questioned what may be happening with the military on island.....students' sense of curiosity competed with planned learning instructions.</p>	<p>Table 4.8-2 of the Revised Draft EIS presents the primary metric for significance analysis of potential noise impacts. The screening criteria for classroom learning impacts begins at 60 decibels day-night average sound level, and no schools are located in areas that would experience a day-night average sound level exceeding 50 decibels.</p>

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65B	<p>Mitigations</p> <ol style="list-style-type: none"> <li>1. Classroom windows; shall replaced all instructional classrooms (inclusive of library, Special education classroom, resource rooms, and Audio-Visual Rooms) windows with noise reduction type of windows significantly reducing noise level that would not compete with classroom instructions for all students including those with disabilities ranging from mental to physical. Autistic, and other psychologically challenged students as well as those challenged on their hearings are all an intricate part of the student population. The noise reduction windows have been used by other schools, libraries, health clinics in other U.S. jurisdictions and/or military base neighborhood.</li> <li>2. State Assessment must see conducive environment to allow students for their best performance. PSS must provide schedule and or changes made to the school calendars must be reported to the appropriate military branch. This includes quarterly examination days. Training calendar must not schedule activities that would create any level of noise and/or other distraction to the students.</li> <li>3. Troop managers, commanders or other titled officers must ensure that troops are provided with cross-cultural education to prevent conflicts arising from “misreading” of cultural gestures and/or communications and, all laws pertaining to the protection of children and youth in the Commonwealth. Youth under the age of 18 and those physically and mentally challenged.</li> <li>4. Because the high school is combined with middle school students; it is crucial that the presence of troops in the campus be reduced as much as possible. This is to address incidents in the past when female middle school-age students were found interacting with Marines. To allow such interactions invites the potential for violations of laws with reference to minors especially those incidents reported and adjudicated by the court of laws as in the experience of the Okinawa women.</li> <li>5. Explore the possibility for schools to “piggyback” on military internet connection to expand the capability of the current infrastructure provided by PSS.</li> </ol>	<p>All proposed training events would occur within the Military Lease Area which is over a mile north of San Jose. Training units would not operate near the public schools in Tinian.</p> <p>The Revised Draft EIS evaluates potential effects of training-related aircraft operations and other noise-generating activities on schools and other noise-sensitive locations (see Section 4.8, Noise). Advance notice of the training schedule in the Military Lease Area would be provided to the Municipality of Tinian.</p> <p>Table 4.8-2 of the Revised Draft EIS presents the primary metric for significance analysis of potential noise impacts. The screening criteria for classroom learning impacts begins at 60 decibels day-night average sound level, and no schools are located in areas that would experience a day-night average sound level exceeding 50 decibels. Thus, additional noise reduction strategies and minimization measures such as specialized noise-reducing windows would not be warranted.</p> <p>All military personnel scheduled to train in the CNMI receive pre-deployment and on-island briefings that emphasize cultural awareness, protection of wildlife, and compliance with environmental regulations. These requirements would be reinforced through unit-level training, Range Control procedures, and environmental protection protocols. The intent is to ensure that all personnel conduct themselves in a manner that respects the people, culture, and natural resources of the CNMI while carrying out training activities. DoD service members are held to a high standard of conduct, and the DoD would act promptly and rigorously to curtail any misconduct and enforce laws to protect citizens.</p> <p>The possibility of providing the community with an internet connection is beyond the scope of the Proposed Action.</p>

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66A	<p>The FAA notes a proposed aircraft shelter is shown on the USAF DIVERT lease area of Tinian International Airport on Figure 2.1-1, Military Lease Area with Proposed Action Features of the Draft CNMI Joint Military Training (CJMT) Environmental Impact Statement (EIS). A footnote on the figure in the legend that says: “This location is approximate.” The Draft EIS indicates the shelter may be used for performing emergent minor aircraft repairs or maintenance, equipment staging, training unit mustering, or similar purposes.</p> <p>The proposed construction of an aircraft shelter on Tinian International Airport may require the review/update of the USAF DIVERT lease with Commonwealth Ports Authority (CPA), the local airport sponsor that owns and operates Tinian International Airport.</p> <p>The CPA’s Airport Layout Plan (ALP) will need to be updated to include the proposed aircraft shelter. The USMC must work with the CPA to update the ALP, and file a Notice of Proposed Construction or Alteration (FAA Form 7460-1) as required by Title 14, Code of Federal Regulations, Part 77, Safe, Efficient Use, and Preservation of the Navigable Airspace, so the FAA can ensure the safe and efficient use of navigable airspace at that location. Depending on the precise location of the shelter, the FAA may have its own National Environmental Policy Act (NEPA) action for the proposed shelter. FAA’s review of Form 7460-1, is not a major federal action that must comply with NEPA.</p> <p>Additionally, since the U.S. Marine Corps’ (USMC) proposed project has substantively changed since 2013 when the FAA had accepted the invitation to be a cooperating agency, the FAA no longer has any federal actions associated with the USMC’s current proposed project. Thus, we request that you remove the FAA from the list of cooperating agencies from your Final Environmental Impact Statement for this proposed project.</p>	<p>The USMC would work with the Commonwealth Ports Authority and the U.S. Air Force on an update to the Airport Layout Plan and follow all Commonwealth Ports Authority and Federal Aviation Administration guidelines in the planning and construction of the proposed aircraft shelter.</p> <p>Thank you for your prior coordination on the Proposed Action. The Final EIS has been updated to remove the Federal Aviation Administration from the list of cooperating agencies.</p>

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67A	<p>Overall impression: Both Alternative Action 1 and 2 propose action that appears incompatible with Fanihi recovery on Tinian, lack acceptable consideration for marine mammals, threaten public use of MLA land for recreation or ranching, and inappropriately attempt to minimize noise impacts to the people of Tinian (and Saipan). Because no fine scale vegetative work has been done to fully understand Tinian’s forests, the DOD has assigned the vast majority (~90%) of MLA land as essentially non-important forest. While they are correct that only a small portion of the MLA contains what can be considered “traditional” native limestone forest, the remaining forest is still home to large quantities of native and medicinal trees, as well as containing high densities of wildlife including coconut crabs, birds, and even deer. As a result of this designation the EIS states that their proposed habitat loss is negligible. The loss of these degraded forest tracts would have a considerable impact on wildlife populations on Tinian and should not be considered negligible. While this EIS indicates that biosecurity measures for brown treesnakes (BTS), coconut rhinoceros beetles (CRB), and little fire ants (LFA) are being developed, there isn’t very much attention given to other potentially harmful invasive species. The suggested biosecurity measures against the top three are not reflective of the absolute most that could be done, which is what the community should demand.</p>	<p>Consistent with requirements under NEPA, including case law, the Revised Draft EIS provided a comprehensive analysis of potential environmental impacts resulting from the Proposed Action based on best available science. Potential impacts on biological resources, recreation/ranching and noise were analyzed in Sections 4.4, 4.2, and 4.8 of the Revised Draft EIS, respectively. As noted in Section 4.4.3.1 (Terrestrial Plant Communities) and further in Appendix D of the Revised Draft EIS, the USMC would continue to comply with existing Joint Region Marianas biosecurity protocols and Integrated Natural Resources Management Plan to reduce the spread of non-native species. The USMC is consulting with the U.S. Fish and Wildlife Service and National Marine Fisheries Service under Section 7 of the Endangered Species Act regarding impacts to Endangered Species Act listed species and their habitats, including potential impacts from invasive species. The consultation will be complete and incorporated, as appropriate, into the Record of Decision. Proposed biosecurity measures from the Draft U.S. Fish and Wildlife Service Endangered Species Act consultation document have been added to Appendix D. Biosecurity protocols would be updated if required by the consultation process and coordinated with CNMI Customs and Biosecurity. It is also important to note the USMC is proposing to build a new brown tree snake barrier and wash rack facility at the port to improve biosecurity infrastructure on Tinian.</p>
67B	<p>Specific comments by page:</p> <p>2-34: Example of weak biosecurity measure. Line 5 indicates that only portable BTS barriers would be used. Permanent barriers exist and could be implemented as a stronger biosecurity option</p> <p>3-21 Table 3.4, and 3-22 : does not accurately reflect the current numbers of Fanihi on Tinian, as well as excludes the importance of areas on the MLA that are especially important for the ongoing recovery* of bats on Tinian. It likewise does not identify the areas of highest fruit bat activity as restricted areas for DOD development.</p> <p>*Recovery is currently happening, it is not theoretical...Tinian fruit bats are present and increasing in numbers.</p>	<p>Trained brown tree snake canine teams would be used at North Field. As noted under 67A, the USMC is proposing to build a new brown tree snake barrier and wash rack facility at the port to improve biosecurity infrastructure on Tinian. A portable wash rack would also be available for use at North Field. Appendix D of the Final EIS has been updated with additional biosecurity protocols. Biosecurity protocols may be updated, if required, following completion of the ongoing Endangered Species Act consultation.</p> <p>The Revised Draft EIS was drafted based on best available information regarding the fanihi.</p>

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67C	<p>4-27: In order to accommodate continued recreation and ranching on the MLA, the EIS states that the MLA will be subdivided to allow these activities to continue, however it does not identify how it will divide up by activity. It may be that x% of land is left available for hunting, but if that land is all tanganan forest, it may not actually be useful for this purpose. Further specificity and scrutiny should be requested by community to understand how their access will be managed.</p>	<p>The Proposed Action would accommodate public access to the Military Lease Area and allow for flexibility in scheduling military training. To achieve this, the Military Lease Area would be divided into eight smaller, separate training areas that may be scheduled individually or several at a time. The public would be allowed access to those training areas not scheduled for military training when they can be safely accommodated. In fact, some training could be conducted without any controls on public access. However, during some training events, public access may be limited for the safety of the public and service members participating in the training. It is the intent of the USMC to allow, when possible, public access to recreational beaches, tourism areas, and the North Field National Historic Landmark. Moreover, as described in Section 2.1.8 of the Revised Draft EIS, the USMC would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. Range Control would work with the Municipality of Tinian to identify in advance any holidays, festivals, or other important days for which public access is needed. Range Control may adjust range management strategies based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p>
67D	<p>4-69. This page primarily addresses impacts of noise pollution. While some beneficial considerations have been made (ex: flights will be restricted to no less than 1000ft above important habitat) it does not address the noise impacts of landing or touch and go exercises. Lake Hagoi, which is among the only areas on Tinian home to the Mariana Moorhen, is within 1,000ft of Landing Zone 2 and we have no reason to believe these exercises would not impact the birds there. There is no mention of this in the EIS. Take home message: how do they plan to address take off/landing noise, which is considerable?</p> <p>4-73: The EIS implies that since each noise event is very short (say the discharge of a firearm, or a single landing event), these events have a negligible impact on wildlife. This does not consider the cumulative effects of what their tables suggest will be a high level of sustained activity year-round.</p> <p>4-116: The EIS continues to use double speak when addressing noise pollution. On the one hand they report that the noise boundaries do not extend much beyond the footprint of the landing zone, and are negligible. This is objectively untrue and many people probably have firsthand experience with this if you've ever been at the airport when they are conducting touch and go's. In Appendix J, their numbers indicate that landing noise covers an area of nearly 12,000ft in diameter. This is much larger than the "landing zone" that they claim in chapter 4 will not produce much noise.</p>	<p>The Proposed Action has been designed in such a way that its elements would avoid as much high-quality habitat as possible, with the vast majority of construction and training occurring in areas dominated by invasive plant species or areas that are already cleared. Additionally, the USMC is consulting with the U.S. Fish and Wildlife Service and National Marine Fisheries Service, under Section 7 of the Endangered Species Act, to ensure compliance with federal law. These consultations will be complete and incorporated, as appropriate, into the Record of Decision.</p> <p>Please note that aircraft use of Landing Zones would be limited to helicopters and MV-22s. Jet aircraft would use North Field for training.</p>

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	<p>4-116: If you run the numbers on their proposed flight hours and assume they are not flying at night, you get three planes flying over Tinian every day. This amount of air traffic would have a deleterious impact on wildlife and people. No one like living under an airport.</p>	
67E	<p>4-71: The documents jumps back and forth and does not clearly state how much flight operations we can expect on Tinian. In some cases they say it will occur for only a few weeks out of the year but their tables report a very different story. The numbers reported in the tables seems to suggest a sustained and high level of activity year-round.</p> <ul style="list-style-type: none"> <li>• Table J-5: 29,238 take offs and landings every year</li> <li>• Table J-7: 27,207 hours of flight within 1 mile of the MLA annually (that is 1,133 days worth of noise)</li> <li>• Table C.2-1: 1,975 training annually</li> </ul>	<p>For flight operations at North Field and the Military Lease Area, the Revised Draft EIS distinguishes between (a) the training tempo analyzed in Chapter 2 (Proposed Action and Alternatives) - for example, up to two large events per year lasting approximately 1 month each, plus intermittent small events (see Table 2.1-1), and (b) the modeling inputs used to evaluate noise and airspace effects in Appendix J (Noise Study) and related appendices. The totals cited (for example, Table J-5 takeoffs/landings at Tinian International Airport and Table J-7 flight-hours for North Field in the Military Lease Area) were conservative modeling assumptions that:</p> <ul style="list-style-type: none"> <li>• counted operations, not scheduled events (e.g., a touch-and-go is counted as both a takeoff and a landing);</li> <li>• aggregated all platforms and profiles across the analyzed year; and</li> <li>• are used to compute noise metrics (e.g., Day-Night Average Sound Level, equivalent sound level) and airspace safety, not to indicate continuous, year-round activity.</li> </ul> <p>Actual scheduling would be consistent with the training tempo described in Chapter 2 (Proposed Action and Alternatives) of the Revised Draft EIS. Activation of air and ground activities would be intermittent and coordinated by Range Control with public notice, consistent with Section 4.8 (Noise) and Appendix J (Noise Study) methodologies of the Revised Draft EIS.</p> <p>Regarding tables cited in the comment, Table J-5 showed proposed flight operations at Tinian International Airport for Alternative 2. Please note that only 1,568 are military flight operations. The other 27,670 flight operations are existing civil aircraft. Table J-6 provided the hours and altitudes that were used for the noise model. The Revised Draft EIS does not have a Table C.2-1.</p>
67F	<p>4-74: The proximity of the proposed Explosives Training Range to known areas of use by Fanihi will harm the recovery effort of this species by causing bats to flush and potentially abandon the island as a home. It will also cause temporary hearing loss, as identified in Appendix J. They report that this is unimportant since fruit bats do not use echolocation to hunt. Would you be willing to lose your hearing for an hour multiple times a day?</p>	<p>As noted in Section 2.1.5.2 (Explosive Training Range) of the Revised Draft EIS, the range's location was identified after considering safety, operational, public health, community access, and environmental factors. The Revised Draft EIS evaluated potential effects to sensitive habitats (see Section 4.4, Biological Resources), including fanihi (fruit bat) roosting areas and native plant communities. The USMC is consulting with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act. The consultation will be complete and incorporated, as appropriate, into the Record of Decision.</p>

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67G	<p>4-77: The EIS suggests that there will be no impacts on migratory birds from north field construction. This is unequivocally untrue. Migratory birds use the north field area for as a stopover site during migration. Since the initiation of construction I have noticed a decrease of these birds on the North Field. Likewise, seabirds such as terns and noddies used to use the tall ironwoods on the north field for nesting sites.</p>	<p>Construction impacts to wildlife were addressed in Section 4.4.3.2 of the Revised Draft EIS and further referenced and included in the discussion of impacts to migratory birds. The USMC concluded there would be less than significant impacts to migratory birds.</p> <p>Best management practices would also be implemented to reduce and minimize impacts to migratory birds, including pre-construction nesting surveys and noise abatement measures to minimize noise impacts from construction.</p>
67H	<p>Additional feedback based on the Public Forum: Plans for a new dump</p> <p>What was communicated at the Public forum: While the dump would be created in collaboration with the DOD it would ultimately be run by the municipality and the current dump would be closed. This future dump would be fee based. In a nutshell the new system would require that people drive further, use a road in poorer condition, and pay to dump their trash.</p> <p>Comments</p> <p>A fee based-program would result increased illegal dumping on Tinian. Illegal dumping is already an issue, and asking community members to drive further and pay more would have an unquestionable impact to illegal dumping. This is evidenced by the huge problem in other fee-based municipalities places like Saipan and Guam have. A better solution would be to allow residents to drop waste at the transfer station located in the village and then transport the waste to the official dump site via dump trucks. This would allow a much higher level of oversight at the dump site, ensuring a higher level of compliance than exists now.</p>	<p>The proposed location for a CNMI future landfill and the method of recovery for the operation of such a landfill is not within the authority of the USMC. These subjects are within the authority and responsibility of the local CNMI government.</p>

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67I	<p>Impacts to tourism</p> <p>The current explosive range is set for development at the base of Mt. Lasso, near some of the best forest on Tinian. Noise from the range will be heard from Chigit and the Blowhole. The impacts of this on tourism is not currently being considered by the Military. Likewise, sections of the MLA will be periodically closed for exercises. As with water restrictions, how this will be communicated with the public is unclear. Although planned closures will be communicated in advance (not day of) how closures will be communicated to tour groups or their impacts on tourism on Tinian are not under consideration. Most people don't like hearing weapons of war while they are on vacation, or viewing a scenic outlook. It's hard to imagine these changes won't have a negative impact on tourism on Tinian. The EIS should more clearly communicate the impacts of this noise level to tourism.</p>	<p>Section 4.8.3.1 describes the potential impact of noise. Based on the cumulative and single event noise levels described in the Revised Draft EIS, there may be some temporary disturbance to recreational users in the Military Lease Area, but these effects would be limited in duration and scope. Range Control would restrict access to surface danger zones and other areas within the Military Lease Area as required to preserve safety. This would ensure the public would not be present in areas where sound levels would be potentially harmful to human hearing. Range Control would provide advance notice of training schedules to the public to make them aware of when and where noise from training may be heard.</p> <p>Section 2.1.8.1 (Scheduling and Logistics for Use of the Military Lease Area Training Areas and Ranges) of the Revised Draft EIS stated that, "The USMC is committed to developing an approach for community access that balances the need for military readiness with safe public access to the Military Lease Area." As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. Range Control would also work with the Municipality of Tinian to identify in advance any holidays, festivals, or other important days for which public access is needed. In addition, Range Control may adjust range management strategies based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p>

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67J	<p>Water restrictions</p> <p>What was communicated at the Public forum: The live-fire range planned for the north end of Tinian extends into the channel used by recreational boaters and commercial ships. Under the current plan, this area would be periodically closed (for hours or days) for safety reasons. How these closures would be disseminated to the public was unclear and the DOD requested comments for how we as the community think they should be shared among the general public. It was news to the DOD personnel representing this part of the plan that this channel is used daily by boats carrying essential supplies to Tinian including food, gas, medicine, and supplies.</p> <p>Comments to consider:</p> <p>This channel provides critical transportation routes for boats carrying food, supplies, and medicine. Limiting access to this route increases risk to boaters, and threatens to interrupt Tinian’s already limited access to goods arriving on island. This also poses safety risks to boaters on Saipan who may not know to access information channels reporting closures. It would also substantially impact CNMI tourism, as it affects some of the premier dive sites in the Marianas. These sites are accessed daily by dive shops based on Saipan and represent a significant source of tourism draw for our already struggling tourism industry. Besides the impacts of noise, this is probably the most imminent and pernicious threat of the current CNMI JMT plan.</p>	<p>As described in Table 2.1-1 and Section 2.1 (Proposed Action) of the Revised Draft EIS, small training events of up to 100 personnel may occur routinely throughout the year, generally lasting one to two weeks each. These training events include pre-live-fire activities (e.g., planning, rehearsal, and setup), a limited period of live-fire training, and post-training activities (e.g., recovery and debrief). Use of the surface danger zones associated with the Multi-Purpose Maneuver Range would be temporary and only active during the periods when live-fire training is conducted and would not remain active for the full duration of a training event. The surface danger zone would be deactivated immediately following completion of live-fire activities. Range Control would issue advance public notifications prior to surface danger zone activation and ensure access restrictions are lifted promptly once live-fire training concludes. Section 2.1.6 of the Revised Draft EIS explained that public notification and coordination with the Commonwealth Ports Authority, U.S. Coast Guard, and local agencies would be used to disseminate closure information through established maritime communication channels such as Notices to Mariners and Marine Safety Information Bulletins. These measures are intended to prevent conflicts with vessels carrying food, fuel, medicine, and other essential supplies, as well as to inform dive operators and recreational boaters.</p> <p>Two surface radar towers would be located on the north and northwest coastline of Tinian. When live-fire training is conducted and one of the surface danger zones has been activated, there would be a lit red light on the towers, and a red flag would be flown. This practice is consistent with Marine Corps Order 3550.10 (Policies and Procedures for Range and Training Area Management) and other USMC range standard operating procedures. An additional safety feature is the surface radar housed in the towers would be used to survey the ocean surface to detect and provide an early warning to Range Control should a boat, or a member of the public or other non-participant, approach the activated surface danger zone from offshore. Should an unplanned encroachment be detected by Range Control (surface vessel or aircraft in the overlying airspace), all training would cease until the non-participant is out of the area. If the range is active prior to surface radar towers being constructed or if surface radar is down for maintenance, trained field spotters would be used. Spotters would be positioned at coastal observation points with unobstructed views of the surface danger zones and would maintain continuous visual surveillance of the ocean surface. Spotters would communicate directly with Range Control to provide early warning of any surface vessels or other non-participants approaching or entering an active danger zone.</p>
68A	<p>As a member of the Tinian community, I respectfully submit this comment on the Revised Draft Environmental Impact Statement (EIS) for the Commonwealth of the Northern Mariana Islands Joint Military Training,</p>	<p>Two surface radar towers would be located on the north and northwest coastline of Tinian. When live-fire training is conducted and one of the surface danger zones has been activated, there would be a lit red light on the towers, and a red flag would be</p>

<i>ID</i>	<i>Comment</i>	<i>Response to Comment</i>
	<p>specifically addressing the proposed west-facing firing range within the Tinian Military Lease Area.</p> <p>Concerns About the West-Facing Firing Range</p> <p>1. Impact on Interstate Commerce</p> <ul style="list-style-type: none"> <li>• The western maritime transit corridor near Tinian is a key route for commercial shipping between the islands. Cargo vessels, fuel tankers, and supply ships depend on safe, dependable access through this corridor to deliver vital goods to Tinian, Rota, and Saipan.</li> <li>• Creating a surface danger zone (SDZ) that extends westward would cause repeated disruptions to this crucial economic route. Even short-term closures or delays would boost fuel costs, delivery times, and overall shipping expenses, increasing the cost of living for island residents.</li> </ul> <p>2. Impact on the Fishing Community</p> <ul style="list-style-type: none"> <li>• The waters west of Tinian are vital to our fishing heritage and economy. Local fishermen-whether for subsistence or commercial purposes-depend on this area for safe navigation and access to abundant fishing grounds.</li> <li>• Restricting access during live-fire training would harm livelihoods, food security, and recreational opportunities. This disruption is especially concerning given the limited access to fishing grounds available in other areas around Tinian.</li> <li>• Fishing is not only an industry but also a cultural practice passed down for generations. Limiting access to these waters undermines both economic resilience and cultural identity.</li> </ul>	<p>flown. This practice is consistent with Marine Corps Order 3550.10 (Policies and Procedures for Range and Training Area Management) and other USMC range standard operating procedures. An additional safety feature is the surface radar housed in the towers would be used to survey the ocean surface to detect and provide an early warning to Range Control should a boat, or a member of the public or other non-participant, approach the activated surface danger zone from offshore. Should an unplanned encroachment be detected by Range Control (surface vessel or aircraft in the overlying airspace), all training would cease until the non-participant is out of the area. If the range is active prior to surface radar towers being constructed or if surface radar is down for maintenance, trained field spotters would be used. Spotters would be positioned at coastal observation points with unobstructed views of the surface danger zones and would maintain continuous visual surveillance of the ocean surface. Spotters would communicate directly with Range Control to provide early warning of any surface vessels or other non-participants approaching or entering an active danger zone.</p> <p>As described in Sections 2.1.6 (Live-Fire Range Safety Areas) and 4.1 (Public Access) of the Revised Draft EIS, surface danger zones would be temporarily activated during scheduled live-fire events. These areas would not be permanently closed. Notification of surface danger zone activations would be made through the U.S. Coast Guard’s Notice to Mariners system, along with other public communication channels. Range Control would work with the CNMI government and Municipality of Tinian to determine the appropriate methods to ensure mariners, including subsistence and night fishermen, receive timely and effective information. The USMC solicited suggestions from the community on the best means of communicating with the fishing and boating community. Input included multilingual notices, physical posting of schedule and other pertinent information at marinas, and use of social media or radio.</p> <p>Text has been added to the Final EIS Section 4.3.3.1 stating “The activation of surface danger zones would also affect commercial shipping vessels transiting in the waters north of Tinian. In comparison to daily fishing and boating, commercial vessels would be present less frequently, and include smaller commercial shippers and approximately four barge trips per month. In order to minimize impacts to shipping schedules, Range Control would coordinate with the Commonwealth Ports Authority to ensure scheduling of training events is understood and communication about shipping schedules is known and any temporary access restrictions would be discussed. The USMC would utilize adaptive management to ensure range safety and scheduling requirements are met, and would make adjustments as needed. Therefore, there would be a less than significant impact to commercial shipping as a result of training under Alternative 1.”</p>

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		<p>As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. Range Control may adjust range operating procedures for communication based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p>
68B	<p>Community Recommendations and Requests for Mitigation</p> <p>To protect the well-being of Tinian residents while recognizing the importance of national defense, we strongly urge the U.S. Marine Corps and cooperating agencies to adopt the following measures in the Final EIS:</p> <ol style="list-style-type: none"> <li>1. Reevaluate Firing Range Orientation: Consider modifying the range layout to prevent west-facing SDZs from overlapping with maritime trade routes and heavily used fishing zones.</li> <li>2. Stakeholder Consultation: Conduct regular consultations with local stakeholders- including shipping operators, the Tinian Community, and fishing associations--before finalizing training schedules that would restrict access to key waters.</li> <li>3. Advance Notification Protocols: Implement transparent and timely public notice procedures, coordinated with the U.S. Coast Guard, so that fishers and commercial operators have adequate time to adjust operations.</li> <li>4. Economic Mitigation Measures: When disruptions are unavoidable, mitigation measures should include compensation or offset programs. This could involve subsidies for fishers or support for the Tinian community coping with increased costs of goods and services.</li> <li>5. Community Benefit Agreements should ensure that any adverse effects on commerce and fishing are offset by concrete community benefits, like investments in local infrastructure, emergency services, or maritime safety initiatives.</li> </ol>	<p>The USMC considered criteria, as described in the Revised Draft EIS Section 2.1.5.1 (Training Infrastructure, Multi-Purpose Maneuver Range) and determined there was only one reasonable location and orientation for the Multi-Purpose Maneuver Range (shown in Figure 2.1-6 of the EIS). This location, north of the North Field National Historic Landmark on the northern tip of Tinian, would place the Multi-Purpose Maneuver Range as far as possible from the village of San Jose to minimize potential impacts from training events on residents and also ensure that training activities do not interfere with tourism in the North Field National Historic Landmark and civilian air traffic. This proposed configuration for the Multi-Purpose Maneuver Range would take advantage of the location of the 1940s mapped roads in this area and conform to the shape of the north tip of Tinian, with the northern proposed range boundary following the edge of the natural terrain.</p> <p>The USMC would work with the CNMI government and Municipality of Tinian to determine the appropriate methods to ensure timely and effective information of training schedules (e.g., multilingual notices, physical posting of schedule and other pertinent information at marinas, use of social media or radio).</p> <p>As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. Range Control would also work with the Municipality of Tinian to identify in advance any holidays, festivals, or other important days for which public access is needed. Range Control may adjust range management strategies based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management). Section 2.3 of the Revised Draft EIS presented proposed management measures to lessen potential impacts of the Proposed Action. These measures include some economic and community benefits.</p> <p>To further offset the significant impact to subsistence fishers, the Final EIS has been updated in Table 2.3-1 to include the following proposed management measure:</p> <ul style="list-style-type: none"> <li>• The DoD would work with CNMI to identify federal programs or funding sources needed to support the siting and installation of fish aggregating devices to offset the impacts to subsistence fishers.</li> </ul>

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69A	<p><b>PROTECTING TINIAN’S SOLE AQUIFER AND WETLANDS</b></p> <p>Tinian’s Sole-Source Aquifer: Tinian relies on a single karst limestone aquifer for all fresh water. This aquifer’s porous nature and shallow water table make it highly vulnerable to surface-borne contaminants. The CJMT EIS acknowledges that Tinian’s geology is predominantly porous limestone (karst), but it downplays contamination risks by citing soil chemistry factors. For example, the EIS asserts that because Tinian’s soils are neutral to alkaline, heavy metals like lead from munitions will be immobilized and unlikely to reach groundwater. Based on this assumption, the EIS concludes “the potential for significant contamination of groundwater is low” and declares impacts to groundwater quality “less than significant” with standard management practices. These conclusions are overly optimistic and not adequately supported by data. Karst aquifers have rapid pathways for water (and pollutants) through cracks and sinkholes, bypassing the soil’s filtering capacity. While neutral pH might reduce lead solubility in ideal lab scenarios, in real conditions of heavy rainfall, ground disturbance, and chemical mixtures, contaminants can still migrate quickly through limestone bedrock.</p> <p>Surface Contamination and Karst Infiltration: The most acute threat to the aquifer is contamination from surface activities: munitions constituents (explosive chemicals, heavy metals), spilled fuel, solvents, and other hazardous materials from training and construction. In a karst setting, pollutants on the ground can migrate to groundwater in days – far faster than in a clay or basaltic aquifer. The CJMT EIS states that most live-fire munitions will be expended in target areas with “moderately permeable, shallow rocky clays” or deeper soils, and claims that the limited presence of basal groundwater in those impact areas, combined with range management practices, will keep risk to groundwater low. We find this reasoning unconvincing. First, “moderately permeable” soil still permits percolation – especially after being cratered by explosives. Second, the northern two-thirds of Tinian (where the Military Lease Area is located) is riddled with sinkholes and solution cavities; even a “deep” water table (~60+ meters in some spots) is not protective if there are fast conduits. Third, the EIS does not discuss the fate of perchlorates, RDX, TNT, and other energetic residues that are far more mobile in water than lead. These contaminants have been found to leach through soils into groundwater at other live-fire ranges. The absence of baseline data in the EIS is telling – DoD has not tested Tinian’s soil or groundwater for these substances pre-training (aside from limited investigations around old WWII sites). Without baseline and ongoing monitoring, any assertion of “no significant contamination” is speculative at best. In fact, current evidence already suggests a problem: due to past WWII</p>	<p>Section 4.11 (Utilities), 4.13 (Groundwater and Hydrology) and Appendix M (Utility Studies) in the Revised Draft EIS acknowledged the importance of Tinian’s groundwater as the only significant source of drinking water.</p> <p>The Revised Draft EIS included extensive analysis of potential impacts of the Proposed Action on Tinian’s aquifer, including groundwater modeling of historic and future community demand with the addition of proposed demand under the Proposed Action during training events, operation and maintenance of the Military Lease Area by Range Control, and during construction of infrastructure. Based on the modeling results, the proposed new potable and non-potable water wells would not impact water quality or salinity on Tinian.</p> <p>As described in Section 4.14 (Surface Waters and Wetlands) of the Revised Draft EIS, the primary condition that would influence the movement or mobility of lead or other metals, such as copper, in an environment is the pH of the soil. The geology of Tinian is predominantly karst, and the soils are derived from limestone bedrock with abundant carbonates and are naturally neutral (pH 6.5–7.0) to alkaline (greater than 7.0). At neutral pH, heavy metals, like lead, become relatively insoluble and the potential for lead to be transported to the ground water or in surface water runoff would be very low (Weil and Brady 2017). Because of the relative scarcity of surface waters on Tinian, best management practices, stormwater management systems, and the natural adsorption of Tinian’s soils, training events under Alternative 1 would have less than significant impacts to surface waters and wetlands.</p> <p>The new proposed ranges would be managed in accordance with the USMC’s Range Environmental Vulnerability Assessment program. The purpose of the Range Environmental Vulnerability Assessment program is to identify whether there is a release or substantial threat of release of munitions constituents from operational ranges to off-range areas. A description of the Range Environmental Vulnerability Assessment program and how the program would serve to monitor the potential for off range migration of munitions constituents at the ranges on Tinian has been added to the Final EIS in Section 4.10.3 (Public Health and Safety).</p> <p>At the request of CNMI, the DoD would fund a one-time hydrogeological study to establish baseline data that could be used to support monitoring of Tinian’s aquifer. This study would consist of groundwater sampling at existing well locations, and laboratory testing of water samples. In addition, the DoD would install up to four groundwater monitoring wells at each of the two live-fire ranges, establish a water monitoring plan, and include one year of baseline monitoring before ranges would become operational. The locations of wells would be determined in collaboration with CNMI Bureau of Environmental Quality (refer to Table 2.3-1 of the Final EIS).</p>

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	<p>activities, “debris, UXO, and other munition constituents” are present in Tinian’s soils today, and they “may present persistent adverse impacts” to the island’s water bodies. It is disturbing that the EIS does not build on this known fact with a robust plan to prevent further contamination.</p>	
69B	<p>Wetland Ecosystems at Risk: Tinian hosts a few wetland areas – notably Lake Hagoi and the Mahalang and Bateha wetlands – which are ecologically and culturally significant (habitats for birds like the Mariana Common Moorhen and traditional foraging areas). Blasting, detonation, and construction near these wetlands pose risks of physical destruction, altered water flow, and pollution runoff. Yet the CJMT EIS provides only cursory mitigation measures. For instance, it notes that military aircraft will maintain a 1,000-ft altitude above wetlands like Lake Hagoi to minimize noise, but it says little about ground-based blasting impacts. There is vague or no detail on buffer zones around wetlands for demolition activities or how the military will prevent explosive residues and sediment from washing into wetland waters. The lack of specific safeguards is alarming, given that even small pollutant loads can eutrophy(1) a closed wetland or harm its wildlife. We remind the DoD that CNMI law prohibits certain hazardous activities near wetlands (e.g. fuel storage within 500 feet of wetlands) – any actions that risk wetland contamination would violate both the spirit of these protections and the EIS’s stated commitments.</p> <p>FOOTNOTE</p> <p>(1) The process or state of a body of water becoming excessively rich in minerals and nutrients, particularly nitrogen and phosphorus.</p>	<p>Impacts to species that occur in wetlands, such as the Mariana Common Moorhen, were analyzed in the Section 4.4 (Biological Resources) of the Revised Draft EIS, while potential impacts to the wetlands themselves were analyzed in Section 4.14 (Surface Waters and Wetlands) of the Revised Draft EIS, and impacts related to noise or vibrations from the Proposed Action were analyzed in Section 4.8 (Noise) of the Revised Draft EIS. Corresponding proposed management measures and best management practices were discussed in the respective sections (e.g., wetland protection, runoff, etc.). As described in Section 4.14 (Surface Waters and Wetlands) of the Revised Draft EIS, the Multi-Purpose Maneuver Range and Explosives Training Range would both be located over a mile from any mapped wetland locations.</p>
69C	<p>Groundwater Modeling and Water Supply: The EIS’s groundwater modeling appears to focus more on water quantity (sustainable yield) than quality. We acknowledge that the EIS quantified the military’s water demand and compared it to Tinian’s aquifer recharge: approximately 372 million gallons per year total demand (military + civilian) vs. an estimated sustainable yield of 4– 5 billion gallons per year. On paper, this suggests extraction is only ~7–9% of recharge, which the EIS deems a “less than significant” impact to availability. However, water quality is the greater concern. Increased pumping near coastal wells could induce saline intrusion into the aquifer, a risk the EIS notes but downplays. Even the Draft EIS admitted that pumping new military wells might cause saltwater intrusion and that the effect of operating certain wells concurrently “has not been quantified”. BECQ has voiced concern that any such intrusion would have “profound effects on the drinking water for the Tinian community,”</p>	<p>The Groundwater Modeling Technical Memorandum in Appendix M of the Revised Draft EIS evaluated the risk of increased salinity associated with the Proposed Action. This technical memorandum also prepared water budgets for both current and future needs. The model results indicated that the Proposed Action would have negligible impacts on the Commonwealth Utilities Corporation water well in either a drought or normal rainfall scenario. Specifically, the groundwater model predicted a slight rise in predicted chloride concentrations in Maui Well No. 2 under drought conditions, with or without the Proposed Action.</p> <p>Annual CNMI Bureau of Environmental and Coastal Quality permitting requirements include reporting pumping volumes and water quality on a well-by-well basis. Based on this information, the Bureau of Environmental and Coastal Quality determines annually the allowable pumping volume for the following year.</p> <p>As noted in the response to 69A, the DoD would fund a one-time hydrogeological study to establish baseline data that could be used to support monitoring of Tinian’s</p>

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	<p>which already struggles with freshwater capacity. In short, the EIS does not fully assure that Tinian’s limited water supply will be safe and sufficient.</p> <p>Before moving forward, independent hydrogeologic studies should verify that pumping plans will not salinize community wells, and contingency plans must be in place if intrusion is detected (e.g. reducing extraction rates or providing alternative water sources to the island).</p>	<p>aquifer. This study would consist of groundwater sampling at existing well locations, and laboratory testing of water samples. In addition, the DoD would install up to four groundwater monitoring wells at each of the two live-fire ranges, establish a water monitoring plan, and include one year of baseline monitoring before ranges would become operational. The locations of wells would be determined in collaboration with CNMI Bureau of Environmental Quality (refer to Table 2.3-1 of the Final EIS).</p>
69D	<p><b>EVIDENCE OF EXISTING CONTAMINATION AND COMPLIANCE ISSUES</b></p> <p>Tinian’s environment is already suffering residual contamination from both historic warfare and recent military-related activities. These real-world examples cast doubt on the CJMT EIS’s assurances and highlight the need for stronger oversight:</p> <p><b>Legacy of WWII and Past Training:</b> Tinian (and neighboring Saipan) were battlefields in World War II, and to this day ordnance and pollutants from that era linger. A recent scientific study of marine sediments off Saipan’s west coast (conducted in 2008–2009) found elevated levels of mercury, copper, zinc, and other metals, which researchers linked to the U.S. invasion of Saipan in 1944. The mercury was traced to mercury fulminate; an explosive primer used in WWII artillery shells. In other words, bombs dropped over 75 years ago are still leaching toxins into the environment. The study’s authors and CNMI environmental officials concluded that “we can only expect similar long-lasting contamination” from the proposed live-fire training on Tinian and Pagan. This sobering context is missing in the EIS. The DoD must acknowledge that without extraordinary precautions, today’s training rounds could become tomorrow’s persistent pollution, just as happened after WWII.</p> <p><b>UXO and Hazardous Debris:</b> Unexploded ordnance (UXO) and military scrap scattered around Tinian’s landscape pose both safety and pollution hazards. The CJMT project would greatly increase the volume of munitions used on Tinian, inevitably leading to more UXO in the soil and coastal waters. The EIS states that range clearance protocols will be followed: units must sweep for duds and debris after training, and periodic thorough clearances are mandated under the Marine Corps’ range management order. We appreciate these procedures on paper, but experience shows they are not fail-proof. UXO is often missed (especially small or buried items), and over time the casings corrode, releasing explosives and heavy metals into soil and groundwater. The EIS even admits that “salt spray and humidity may accelerate deterioration of [ordnance] casing”, potentially releasing contaminants. Yet it simultaneously claims that</p>	<p>As discussed in Section 3.10.4 (Public Health and Safety - Unexploded Ordnance [UXO] and Discarded Military Munitions) of the Revised Draft EIS, the U.S. military has ongoing responsibilities to manage and address legacy UXO in accordance with DoD programs and applicable safety standards. If encountered during the construction or subsequent use of the Military Lease Area, any UXO, munitions, or munitions debris that pre-date the Proposed Action (i.e., from World War II or that are unrelated to current or planned military training) would be managed per the Comprehensive Environmental Response, Compensation, and Liability Act response processes and procedures.</p> <p>Under the Proposed Action, the construction contract would specify that a qualified explosive ordnance disposal technician must be available during earthmoving activities to investigate and determine the appropriate method for disposal (e.g., destroyed in place if unsafe to move or identifying the offsite disposal or location and handling procedures). There is currently no approved site for the disposal of UXO on Tinian, and permitting the Explosives Training Range as an approved site for the disposal of UXO is beyond the scope of the Proposed Action.</p> <p>Range Control would be responsible for range clearance and post-training inspections after training has concluded, including the removal of military munitions (e.g., destruction, removal, and proper disposition of military munitions and other range-related debris, target debris, military munitions packaging, and crating material).</p> <p>The new proposed ranges would be managed in accordance with the USMC’s Range Environmental Vulnerability Assessment program. The purpose of the Range Environmental Vulnerability Assessment program is to identify whether there is a release or substantial threat of release of munitions constituents from operational ranges to off-range areas. A description of the Range Environmental Vulnerability Assessment program and how the program would serve to monitor the potential for off range migration of munitions constituents at the ranges on Tinian has been added to the Final EIS in Section 4.10.3 (Public Health and Safety).</p>

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	<p>because the release might be slow and lead doesn't travel far, the risk is negligible. This internal inconsistency, acknowledging corrosion and release on one hand, then brushing aside its significance on the other – is unacceptable. We insist that all UXO and munitions debris must eventually be removed if Tinian's environment is to be truly protected. The final plan should include funding and a schedule for UXO clearance during and after the training activities, not merely at the end of some decades-long period.</p>	
69E	<p>Recent Contamination by DoD Contractors: A glaring example of environmental harm on Tinian occurred in 2020–2021, when a private contractor (hired by the U.S. military Seabee unit) was found to be illegally dumping raw sewage into Tinian's municipal dump. The dump is an unlined landfill located upslope of coastal waters. Instead of using the designated leaching field, the contractor's pumper truck discharged wastewater directly into the ground at the dump. This malpractice resulted in a surge of bacterial contamination (enterococci) and nutrient pollution in downstream coastal waters, with measured violations of water quality standards jumping dramatically. Tinian's environmental agency investigated and penalized the company in 2021, after which beach contamination levels dropped back down. While the prompt response by local regulators is commendable, the incident is a red flag. It shows that DoD's oversight of its contractors was lacking; without local whistleblowers or enforcement, the pollution could have continued unchecked. It also underscores how vulnerable Tinian's groundwater and nearshore waters are when basic rules are flouted. If sewage effluent can cause a spike in contaminants, consider how a spill of diesel fuel, a mismanaged chemical, or years of spent munitions could silently impact the aquifer.</p> <p>Additionally, this incident reveals a broader infrastructure need: Tinian has no modern sewage treatment plant or lined landfill. The military's presence will exacerbate waste generation, and it has a responsibility to invest in proper waste management facilities (e.g. a fully lined, monitored landfill cell and wastewater treatment capacity) rather than relying on substandard local systems. Currently, all residents use septic systems and an "unlined dump" for solid waste, which already causes groundwater leachate issues. An influx of military personnel and activities will multiply these risks unless mitigated with new infrastructure and strict waste disposal protocols.</p>	<p>The USMC would comply with all applicable laws and regulations concerning the disposal of any waste generated as a result of the Proposed Action. Any contracted disposal of waste would impose requirements upon contractors to comply with all applicable federal and CNMI laws and regulations governing their actions. Further, USMC would employ appropriate contract enforcement actions in the event of noncompliance.</p> <p>Consistent with requirements under NEPA, including case law, the Revised Draft EIS provided a comprehensive analysis of potential environmental impacts resulting from the Proposed Action based on best available science.</p>
69F	<p>The CJMT EIS's mitigation plan must include stronger enforcement mechanisms to prevent such violations – simply assuming contractors or units will follow best practices is not enough.</p>	<p>The USMC would comply with applicable CNMI regulations and would use contractors licensed by CNMI agencies. In addition, as noted in the response to 69E, the USMC would employ appropriate contract enforcement actions in the event of noncompliance.</p>

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69G	<p><b>HISTORICAL PRECEDENTS OF MILITARY ENVIRONMENTAL DAMAGE</b></p> <p>The people of Tinian are not alone in facing the impacts of militarization. Around the world – and within the United States and its territories – we have seen repeated patterns of environmental destruction and inadequate cleanup following military use. The CJMT EIS notably fails to mention or learn from these cases. We raise them here as cautionary examples that underscore why Tinian’s concerns are justified and why robust safeguards (not vague promises) are needed. Lesson for Tinian: Even with significant funding and the best intentions, once an island is used as a bombing range, it will never be fully restored. Any assurances in the CJMT EIS that “periodic clearance” will handle UXO must be met with skepticism.</p>	<p>The Revised Draft EIS provided a comprehensive analysis of potential environmental impacts resulting from the Proposed Action. Where a potentially significant impact was identified through the environmental impact analysis process, the USMC has suggested, or continues to work toward, developing and implementing measures to avoid or reduce those impacts. The USMC would ensure military operations and training are performed in compliance with applicable federal and local environmental laws, rules, and regulations.</p> <p>With respect to UXO, please see the responses to 69D.</p>
69H	<p><b>DEFICIENCIES IN MITIGATION, MONITORING, AND ENFORCEMENT PLANS</b></p> <p>The CJMT EIS relies heavily on mitigation measures and best management practices (BMPs) to reduce anticipated impacts. However, many of these measures are described in vague or non-committal terms, and the EIS lacks clear plans for monitoring and enforcement to ensure these measures are effective. This section calls out some key weaknesses:</p> <p><b>Groundwater and Water Quality Monitoring:</b> The EIS does not present a robust monitoring regime for early detection of groundwater contamination. It suggests that periodic testing of soil and water will be conducted, but specifics are scant. For example, will there be monitoring wells downstream of ranges and the fuel storage areas, with quarterly sampling for explosives, perchlorate, heavy metals, and hydrocarbons? Will data be shared transparently with CNMI agencies and the public in real-time? The EIS needed to spell this out, but it did not. BECQ noted in comments that DoD did “not propose to test for the chemical fate of munitions constituents until after one year” of training – leaving a huge gap where contamination could occur undetected. There is also no baseline dataset for many contaminants, meaning the EIS has no yardstick for “before vs. after.” This is a glaring flaw. Recommendation: At minimum, a comprehensive baseline groundwater and soil sampling campaign must be conducted before any training begins (for parameters including but not limited to nitrates, phosphates, pH, conductivity, explosives (TNT/RDX), perchlorate, PAHs, solvents, metals like lead, copper, mercury, etc.). Then, a continuous monitoring plan should be implemented with independent oversight: e.g. biannual testing of all observation wells and select down-gradient civilian wells, with results reported to CNMI BECQ. If any contaminant approaches or exceeds CNMI or</p>	<p>All military personnel scheduled to train in the CNMI receive pre-deployment and on-island briefings that emphasize cultural awareness, protection of wildlife, and compliance with environmental regulations. These requirements would be reinforced through unit-level training, Range Control procedures, and environmental protection protocols.</p> <p>Table 2.1-3 (Summary of Range Control Duties and Responsibilities) of the Revised Draft EIS outlined Range Control responsibilities to include ensuring training units comply with applicable laws, rules, regulations, and policies that govern protection of natural and cultural resources, air emissions, drinking water, wastewater, solid waste, munitions, hazardous materials, hazardous wastes, emergency planning, and right-to-know provisions.</p> <p>As noted in the response to 69A, the DoD would fund a one-time hydrogeological study to establish baseline data that could be used to support monitoring of Tinian’s aquifer. This study would consist of groundwater sampling at existing well locations, and laboratory testing of water samples. In addition, the DoD would install up to four groundwater monitoring wells at each of the two live-fire ranges, establish a water monitoring plan, and include one year of baseline monitoring before ranges would become operational. The locations of wells would be determined in collaboration with CNMI Bureau of Environmental Quality (refer to Table 2.3-1 of the Final EIS).</p> <p>As noted in the response to 69C, annual CNMI Bureau of Environmental and Coastal Quality permitting requirements include reporting pumping volumes and water quality on a well-by-well basis. Based on this information, the Bureau of Environmental and Coastal Quality determines annually the allowable pumping volume for the following year. This requirement involves local expertise on groundwater quality and quantity and ensures that pumping is adapted to changing conditions.</p>

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	<p>EPA drinking water standards, an immediate halt to the contributing activity must be triggered and remedial action taken. The current EIS does not contain such a failsafe mechanism.</p>	<p>As noted in the response to 69D, The proposed ranges would be managed in accordance with the USMC’s Range Environmental Vulnerability Assessment program. The purpose of the Range Environmental Vulnerability Assessment program is to identify whether there is a release or substantial threat of release of munitions constituents from operational ranges to off-range areas. A description of the Range Environmental Vulnerability Assessment program and how the program would serve to monitor the potential for off range migration of munitions constituents at the ranges on Tinian has been added to the Final EIS in Section 4.10.3 (Public Health and Safety).</p>
69I	<p>Blasting and Vibration Impacts Near Cultural Sites: The EIS recognizes that certain historic sites on Tinian, such as the North Field airstrips, World War II-era bunkers and landing beaches, are part of a National Historic Landmark District, and that by law the DoD must “minimize harm” to these landmarks. It also acknowledges other cultural resources like prehistoric latte stone sites, historic ranch features, and sacred areas used by the community. However, the mitigation measures for cultural resources are mostly procedural (consultation under Section 106 of the National Historic Preservation Act, archaeological monitoring during construction, etc.). The EIS does not directly address how blast pressures, noise, and earth vibration from heavy detonations might physically affect historic structures (for example, the integrity of old concrete pillboxes or bomb magazine structures from WWII), or how noise and intrusion might impact the sanctity of cultural landscapes and practices. Blasting near caves or limestone rock shelters that might hold cultural artifacts could cause collapses or damage that no amount of documentation can undo. We found no specific buffering guideline in the EIS such as minimum standoff distances from known cultural sites for explosive training events. This is a significant omission.</p> <p>Recommendation: All known cultural sites, especially those eligible for or listed on the National Register of Historic Places, should have exclusion zones around them where no high-explosive detonations or construction vibration can occur within a certain radius (determined by engineering analysis). Additionally, real-time vibration sensors should be placed at key historic structures when nearby blasting is planned, to monitor and ensure thresholds are not exceeded. If vibration or overpressure levels approach damaging thresholds, activities should cease. The final EIS/Record of Decision should commit to specific protective buffers for Tinian’s historic and sacred sites – mere “consultation” is not enough to guarantee preservation.</p>	<p>The cultural resources analysis presented in Section 4.5 of the Revised Draft EIS accounts for cumulative and indirect effects to cultural resources and historic properties, including blasting and vibration impacts. The noise analysis presented in Section 4.8 and Table 4.8-5 lists noise levels in relation to points of interest on Tinian. Additional analysis and the discussion of the physical effects of vibration have been added to the Final EIS in Section 4.5.3.1. The conclusion of the analysis found that historic properties would not be affected by blasting or vibration, therefore monitoring is not needed.</p> <p>In compliance with NEPA and the National Historic Preservation Act, the Revised Draft EIS analyzed impacts and effects on cultural resources, to include historic properties in Section 4.5. The Proposed Action would avoid impacts to cultural resources where possible and would not affect Traditional Cultural Properties.</p>
69J	<p>Wetlands and Wildlife Mitigations: As noted, aside from an altitude restriction for aircraft over wetlands, the EIS provides little detail on protecting wetland</p>	<p>With respect to impacts on wetlands, please see responses to 69A and 69B above. Additionally, as stated in Chapter 2 (Proposed Action and Alternatives) of the Revised</p>

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	<p>ecology. We consider this a deficiency that needs rectification. For instance, Lake Hagoi is habitat to the endangered Mariana common moorhen. The EIS should include measures such as: no firing of weapons or use of high explosives within a certain distance of Lake Hagoi and other wetlands; erosion control around any construction near wetland catchments; no use of toxic targets (e.g. avoid lead or chemical-biocide targets) that could introduce poisons. If blasting is to occur in the watershed of a wetland, water quality monitoring of that wetland should be done to check for any spike in turbidity or contaminants. The EIS also should clarify how it will enforce these measures. It is unclear which agency or body will ensure compliance on-site – Will Range Control also double as environmental monitor? If so, are they trained for that role, and do they have authority to halt exercises if, say, a fuel spill happens or if protective measures are not in place? The document is silent on these enforcement logistics. Recommendation: A dedicated Environmental Surveillance and Compliance Team (including CNMI environmental representatives) should be established for CJMT activities. This team would have unfettered access to training areas to observe activities, verify mitigations (fuel spill kits present, dust suppression, etc.), and authority to call time-outs if an imminent environmental hazard is observed. Without independent or empowered oversight, even well-intentioned mitigations can fail.</p>	<p>Draft EIS, all wetlands would be “no training areas” and thus activities under the Proposed Action would not occur in wetlands.</p> <p>With respect to establishing an independent enforcement team, the USMC has established comprehensive programs to ensure environmental accountability in conjunction with federal and local entities. All military personnel scheduled to train in the CNMI receive pre-deployment and on-island briefings that emphasize cultural awareness, protection of wildlife, and compliance with environmental regulations. These requirements are reinforced through unit-level training, Range Control procedures, and environmental protection protocols. The intent is to ensure that all personnel conduct themselves in a manner that respects the people, culture, and natural resources of the CNMI while carrying out training activities.</p>
69K	<p>Handling of Hazardous Materials and Waste: The EIS states that all hazardous waste from construction will be shipped off-island and that any UXO found during construction will be handled per applicable regulations. However, BECQ’s review in 2015 noted confusion about where these wastes would go, since Guam (the nearest hub) does not have a permitted RCRA Subtitle C hazardous waste landfill, meaning off-island likely means to the U.S. mainland. The Final EIS needs to confirm the disposal path for hazardous wastes and ensure it is feasible and funded. Moreover, operational hazardous waste (during training) is not clearly addressed, spent munitions, polluted target debris, etc., all count as hazardous waste. The EIS should explicitly commit that the military regularly remove these materials from Tinian and dispose of them properly off-island (or treat them appropriately on-island if a safe method exists). Any temporary storage of hazardous waste on Tinian must be in lined, contained, weather-protected facilities, not left on bare ground. This level of detail is missing. The same goes for fuel handling: we need confirmation that all fuel tanks for the Base Camp or airfield exercises will have secondary containment and leak detection. Tinian’s history, as mentioned, includes rusty WWII fuel tanks that leaked into groundwater because they were just set on soil. The DoD must not repeat that mistake; any new fuel storage on Tinian should be double-</p>	<p>The Revised Draft EIS stated in Section 3.11.3 (Utilities, Solid Waste and Hazardous Waste) that due to the lack of a hazardous waste disposal facility on Tinian, the military currently removes all solid and hazardous waste generated during training exercises for off-island disposal in accordance with applicable laws and regulations. As described in Section 4.10 and 4.11 (Public Health and Safety and Utilities, respectively) of the Revised Draft EIS, all hazardous materials associated with construction or training under the Proposed Action would continue to be stored, handled and disposed of in accordance with all applicable laws, regulations and permits. This includes the proper storage and handling of hazardous materials (including fuel in temporary, portable aboveground bulk diesel storage containers) in areas equipped with impervious barriers or that utilize dual containment structures to further prevent spills or releases. Hazardous materials handling and storage areas would be located away from catch basins, storm drains, and waterways. Spill response kits would be located close to all areas where hazardous materials are handled. Personnel responsible for the handling and storage of hazardous materials receive regular training.</p> <p>The application of best management practices would further minimize the possible release of contaminants. Fuel storage tanks would be sited, constructed, and operated in accordance with applicable regulations. All required operational and emergency</p>

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	lined, with berms, and ideally kept 500+ feet from any wetland or shoreline (complying with CNMI regulations). The EIS implies such measures but does not explicitly map them out. We expect these details to be ironed out in any final decision, in binding form.	response plans would be developed and implemented with periodic training as required.
69L	<p>Enforcement and Accountability: Perhaps the most troubling aspect of the mitigation plan is the question of “Who will enforce it?”. The CJMT proposal significantly increases the military’s footprint in the CNMI, but jurisdictionally the Military Lease Area is still CNMI land (leased, not owned). CNMI agencies like BECQ, Department of Lands and Natural Resources (DLNR), and others should have a say and oversight role. The EIS should clarify how local environmental laws and permit conditions will be enforced. For example, will CNMI conservation officers or DEQ inspectors be allowed on-site during exercises to ensure compliance with erosion control or protected species measures? If monitoring finds a violation (say, a water quality exceedance or an unreported spill), what penalties or corrective actions are triggered, and by whom? The document presently gives the impression that the military will self-regulate via Range Control and internal protocols. Self-regulation is not sufficient, as demonstrated by the earlier sewage dumping incident (which was caught only by external inspection). Therefore, an enforceable mechanism, such as a Memorandum of Agreement giving CNMI regulatory personnel authority to conduct inspections, or the establishment of an independent environmental ombudsman, is necessary. Furthermore, the DoD should commit to consequences if standards are violated: for instance, a bond or dedicated fund that can be used for cleanup in case of contamination events, and suspension of training activities until issues are remedied. Without these teeth, the mitigation plan risks being a paper promise.</p> <p>In summary, while the CJMT EIS lists many mitigative intentions, it lacks specificity, monitoring rigor, and clear enforcement provisions. We are calling for these gaps to be filled with concrete plans. Mitigation measures should not be just optimistic statements; they must be binding commitments with a system to ensure they are carried out to the letter. The people of Tinian will hold the DoD to its word, and thus that word must be made ironclad.</p>	<p>The Military Lease Area and the military activities conducted thereon are subject to applicable CNMI and federal laws and regulations.</p> <p>Military activities within the Military Lease Area would be managed by an on-island Range Control. The USMC would design the live-fire ranges (Multi-Purpose Maneuver Range and Explosives Training Range) in accordance with Marine Corps Order 3570.1C (Range Safety), Marine Corps Order 3550.10 (Policies and Procedures for Range and Training Area Management). To guide the management, use, and scheduling of the Military Lease Area for training, a set of standard operating procedures would be developed. These standard operating procedures would specify roles and responsibilities for Range Control and training units, give descriptions of the ranges and training areas, provide instructions on how to schedule training, define safety regulations for all live-fire, maneuver, and air operations, and identify environmental compliance and regulatory management requirements. In addition, the Military Lease Area would be certified by USMC in accordance with Marine Corps Order 3550.9A (Operational Training Range Certification/ Recertification Program) and standard operating procedures.</p> <p>As noted in 69J, the USMC has established, comprehensive programs to ensure environmental accountability in conjunction with federal and local entities. All military personnel scheduled to train in the CNMI receive pre-deployment and on-island briefings that emphasize cultural awareness, protection of wildlife, and compliance with environmental regulations. These requirements are reinforced through unit-level training, Range Control procedures, and environmental protection protocols. The intent is to ensure that all personnel conduct themselves in a manner that respects the people, culture, and natural resources of the CNMI while carrying out training activities.</p>
69M	<p>IMPACTS ON PUBLIC HEALTH, CULTURAL PRACTICE, AND LOCAL ECONOMY</p> <p>Beyond the biophysical environment, the CJMT proposal stands to significantly affect Tinian’s people and way of life. The EIS, as a NEPA document, is</p>	<p>As discussed in Section 3.10.4 (Public Health and Safety - Unexploded Ordnance and Discarded Military Munitions) of the Revised Draft EIS, the U.S. military has ongoing responsibilities to manage and address legacy UXO in accordance with DoD programs and applicable safety standards. Also, please see the response to 69D above.</p> <p>With respect to concerns about soil and groundwater contamination, a description of the USMC’s Range Environmental Vulnerability Assessment program and how the</p>

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	<p>required to consider socio-economic impacts and environmental justice, but we find its treatment of these issues to be insufficient. Our concerns include:</p> <p>Public Health Risks: Water is life, and as detailed, any contamination of Tinian’s aquifer would directly endanger public health – whether through acute chemical exposure or long-term accumulation of toxins in the food chain. The community’s health could also be affected by increased dust and air pollution from construction and training (particulate matter, emissions), noise stress, and potential accidents (e.g. a wayward munition or wildfire). The EIS’s Public Health and Safety chapter mostly emphasizes the safety of military personnel and the public during training operations (e.g. preventing trespassers during live-fire, managing explosives safely). It concludes that with protocols, there would be no significant health and safety impacts – but this overlooks subtler health pathways. For instance, the ingestion of fish or crops contaminated by runoffs is not adequately discussed. Tinian’s residents still practice subsistence fishing and farming to some extent. If UXO and munitions are left in the field or near shore, heavy metals and explosives can end up in fish (as seen in Vieques, where studies found elevated carcinogens in seafood). We urge that a thorough health risk assessment be carried out, covering potential exposure to munitions constituents, noise, and other stressors. Medical monitoring might even be warranted for the population over the long term (similar to what is being demanded in Vieques). At the very least, the military should fund ongoing testing of catchment water, crops, fish, and other locally sourced foods for contaminants, to ensure residents are not being slowly poisoned by the training activities. If the CJMT EIS is truly confident in “no significant contamination,” then the DoD should have no objection to such monitoring to verify that claim.</p>	<p>program would serve to monitor the potential for off range migration of munitions constituents at the ranges on Tinian has been added to the Final EIS in Section 4.10.3 (Public Health and Safety). The Range Environmental Vulnerability Assessment program includes conducting an assessment to gain a better understanding of the potential transport of munitions constituents from the proposed live-fire range areas. This assessment would include modeling worst case scenario for munitions constituents migration to off range areas including where pathways could reach groundwater.</p> <p>As described in Section 4.14 (Surface Waters and Wetlands) of the Revised Draft EIS, the primary condition that would influence the movement or mobility of lead or other metals, such as copper, in an environment is the pH of the soil. The geology of Tinian is predominantly karst, and the soils are derived from limestone bedrock with abundant carbonates and are naturally neutral (pH 6.5–7.0) to alkaline (greater than 7.0). At neutral pH, heavy metals, like lead, become relatively insoluble and the potential for lead to be transported to the ground water or in surface water runoff would be very low (Weil and Brady 2017).</p> <p>As noted in the response to 69A, the DoD would fund a one-time hydrogeological study to establish baseline data that could be used to support monitoring of Tinian’s aquifer. This study would consist of groundwater sampling at existing well locations, and laboratory testing of water samples. In addition, the DoD would install up to four groundwater monitoring wells at each of the two live-fire ranges, establish a water monitoring plan, and include one year of baseline monitoring before ranges would become operational. The locations of wells would be determined in collaboration with CNMI Bureau of Environmental Quality (refer to Table 2.3-1 of the Final EIS).</p>
69N	<p>Restrictions on Land and Ocean Use: Under the proposed action, large areas of Tinian (the entire Military Lease Area, which is roughly two-thirds of the island) will see increased frequency of closures for military training. This will directly limit public access to places that residents currently use for recreation, subsistence, and cultural practices. Beaches and waters that fishermen and families use may be off-limits during exercises. The EIS acknowledges this in part, but likely underestimates the impact. Currently, the MLA is leased but not constantly active; local people can request access to certain sites and have traditionally enjoyed some freedom when no training is happening. With CJMT’s heavier tempo, those opportunities shrink. As BECQ pointed out, the DEIS did not adequately address the impact on tourism and livelihoods – for example, scuba dive operators on Tinian and Saipan rely on dive sites around Tinian (including the famed dumping ground wrecks and coral areas in the MLA waters). If artillery firing or beach landings regularly churn up sediment</p>	<p>The Proposed Action would accommodate public access to the Military Lease Area and allow for flexibility in scheduling military training. To achieve this, the Military Lease Area would be divided into eight smaller, separate training areas that may be scheduled individually or several at a time. The public would be allowed access to those training areas not scheduled for military training when they can be safely accommodated. In fact, some training could be conducted without any controls on public access. However, during some training events, public access may be limited for the safety of the public and service members participating in the training. It is the intent of the USMC to allow, when possible, public access to recreational beaches, tourism areas, and the North Field National Historic Landmark. Moreover, as described in Section 2.1.8 of the Revised Draft EIS, the USMC would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. Range Control would work with the Municipality of Tinian to identify in</p>

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	<p>or force ocean closures, it could “potentially put some [operators] out of business”. The local tourism economy, already fragile, cannot afford such losses. Similarly, if nearshore reefs are degraded by sediment or explosions (analogous to “sandblasting” a reef with landing craft, as one comment described it), the fish stocks will decline, hurting subsistence fishermen and cultural fishing practices.</p>	<p>advance any holidays, festivals, or other important days for which public access is needed. Range Control may adjust range management strategies based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p> <p>As described in Sections 2.1.6 (Live-Fire Range Safety Areas) and 4.1 (Public Access) of the Revised Draft EIS, surface danger zones would be temporarily activated during scheduled live-fire events. These areas would not be permanently closed. Notification of surface danger zone activations would be made through the U.S. Coast Guard’s Notice to Mariners system, along with other public communication channels. Range Control would work with the CNMI government and Municipality of Tinian to determine the appropriate methods to ensure mariners receive timely and effective information. The USMC solicited suggestions from the community on the best means of communicating with the fishing and boating community. Input included multilingual notices, physical posting of schedule and other pertinent information at marinas, and use of social media or radio.</p> <p>There would be no in-water training associated with the Proposed Action.</p>
690	<p>The EIS should have – but did not – outline a plan to compensate or accommodate local users who will be displaced from traditional areas.</p> <p>Recommendation: DoD should establish a Community Access Plan that clearly delineates which areas (land or sea) are restricted and when, and conversely, which areas will always remain accessible to residents. Culturally or economically important sites should, to the maximum extent, be left accessible. If certain sites must be closed, provide alternatives or designate limited windows when residents can enter (e.g., if a shrine or fishing spot lies in the range, coordinate cease-fire windows to allow visits under supervision). Additionally, a fund could be set up to support local businesses that suffer economic harm from range activities (for instance, if dive sites are closed for long periods, compensate dive shop owners for lost revenue). These measures would show good faith and respect for the local economy and customs, which are inseparable from the land and sea.</p>	<p>For land areas on Tinian, Section 2.1.8.1 of the Revised Draft EIS (Scheduling and Logistics for Use of the Military Lease Area Training Areas and Ranges) stated that, “The USMC is committed to developing an approach for community access that balances the need for military readiness with safe public access to the Military Lease Area.”</p> <p>For training scheduling purposes, the Military Lease Area would be divided into eight smaller, separate training areas allowing safe public access in areas where training activities would not be occurring. During some training events, public access may be limited for the safety of the public and service members participating in the training. However, when possible, public access to recreational beaches, tourism areas, and the North Field National Historic Landmark would continue to be available to the local community and tourists even when training may be occurring. Some training could be conducted without any access controls.</p> <p>As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. Range Control may adjust range operating procedures for communication based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p> <p>As described in Sections 2.1.6 (Live-Fire Range Safety Areas) and 4.1 (Public Access) of the Revised Draft EIS, surface danger zones would be temporarily activated during</p>

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		<p>scheduled live-fire events. These areas would not be permanently closed. Notification of surface danger zone activations would be made through the U.S. Coast Guard’s Notice to Mariners system, along with other public communication channels. The USMC would work with the CNMI government and Municipality of Tinian to determine the appropriate methods to ensure mariners, including subsistence and night fishermen, receive timely and effective information. The USMC solicited suggestions from the community on the best means of communicating with the fishing and boating community. Input included multilingual notices, physical posting of schedule and other pertinent information at marinas, and use of social media or radio.</p> <p>The establishment of funding for impacts to the local economy from the proposed action is outside the scope of this EIS.</p>
69P	<p>Cultural Preservation and Self-Determination: Tinian’s cultural heritage is rich – from the Latte period archaeological sites that speak of Chamorro ancestors, to Spanish period vestiges, to World War II relics, to continuing practices like ranching, fishing, and gathering. The EIS identifies many of the known historic sites, but culture is more than static sites; it’s also about ongoing relationships with the land. The military training proposal threatens to erode those relationships by fencing off large tracts and subjecting them to loud, and at times violent, activities incompatible with traditional use. We emphasize that cultural resources include sacred landscapes and practices, not just artifacts in the ground. For example, if islanders have traditionally gone to certain wild locations in the MLA to hunt or collect medicinal plants, or simply to feel a connection with their ancestors, those practices could be lost. The EIS does mention access limitations as a potential impact and suggests that these would be mitigated by scheduling around important cultural events where possible. However, the community was not fully consulted on what they consider “important” or how the training might inadvertently desecrate sites. Blasting near a known ancient village site could be seen as sacrilege; even if the site is not physically hit, the act of firing in its vicinity can be culturally offensive. This intangible impact is hard to quantify, but it is very real to the people. It goes to the heart of environmental self-determination: the people of Tinian have the right to say that certain places or practices are too sacred or vital to be disrupted by any outsider, including the U.S. military. We call on decision-makers to heed the voices of Tinian’s leadership and community, who have repeatedly expressed that they do not want their island turned into a perpetual war games site without strict limits and respect for their heritage. The CNMI Constitution enshrines protections for cultural traditions and the inherent rights of its people over their natural resources.</p>	<p>In compliance with NEPA and the National Historic Preservation Act, the Revised Draft EIS analyzed impacts and effects on cultural resources, to include historic properties in Section 4.5. Proposed training locations were sited specifically to avoid cultural resources where possible. Both NEPA and the Section 106 process of the National Historic Preservation Act include opportunities for the public, interested parties, and members of the community, including those of Chamorro and Carolinian descent, to identify cultural resources to include historic properties and potential effects as well as comment on the assessment of effects and proposed mitigation. The Section 106 consultation was conducted in good faith with the CNMI Historic Preservation Office, the Advisory Council on Historic Preservation, the National Parks Service, and the Municipality of Tinian and the public.</p> <p>The noise analysis presented in Section 4.8 and Table 4.8-5 of the Revised Draft EIS lists noise levels in relation to points of interest on Tinian. Impacts to public access are analyzed in Section 4.1. Also, please see response to 69O above.</p>

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	<p>The EIS and the eventual Record of Decision should explicitly affirm that nothing in the CJMT project will supersede the people’s right to protect their water and sacred places. In practical terms, this means if a conflict arises between training schedules and a cultural need (say, a funeral at a clan cemetery within the MLA, or a cultural harvest season in the forest), the cultural need should have priority.</p>	
69Q	<p>Psychosocial Impacts: Though harder to measure, the presence of intensive military activity can have psychosocial effects on a small community. Vieques, for example, reported high levels of anxiety and disruption from constant bombing noise before the range was closed. Tinian could face similar issues: loud noise from artillery, low-flying military aircraft, and the general stress of militarization can affect mental health and community well-being. Children in particular could experience fear or confusion from hearing explosions if not properly forewarned and educated.</p>	<p>The Revised Draft EIS Section 4.8 (Noise) analyzed estimated peak sound levels for representative weapons and ammunition that would be used at the Multi-Purpose Maneuver Range. Range Control would provide advance notice to the community of the training schedule and types of noise that may be heard, and public access to the training areas affected would be controlled. Specifically, the surface danger zone around the Multi-Purpose Maneuver Range, where the 104 decibel contour overlaps, would be within Training Area D and public access to this training area would be controlled. Thus, members of the public would not be present in areas that would experience peak sound levels above 104 decibels. Peak sound levels up to 104 decibels would reach as far as the southernmost runway at North Field and extend over the waters north and northwest of Tinian. At these levels, sound may cause a startle effect and would be considered moderately likely to produce annoyance especially for people who are not accustomed to hearing gunfire noise.</p>
69R	<p>The EIS should ensure robust community engagement and notification for each exercise (which it mentions in context of public safety notices), but beyond that, there should be support (perhaps counseling services or community liaisons) to help residents cope with the changes. Ideally, the DoD would limit the most disruptive activities to certain times of day and avoid nighttime live-fire that could terrorize people in their homes. Clear two-way communication channels are necessary so that residents can voice concerns or report incidents (for example, if a stray round starts a bush fire on private land, or if blast noise causes structural damage to someone’s home, the military must respond and make amends immediately).</p>	<p>All proposed training events would occur within the Military Lease Area which is north of Tinian International Airport and over a mile north of the village of San Jose. Training units would not operate near San Jose residential areas. Table 2.1-3 (Summary of Range Control Duties and Responsibilities) of the Revised Draft EIS outlined procedures to ensure clear two-way communication between the USMC and the residents of Tinian, so that concerns can be raised and addressed.</p> <p>As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advanced notice of where, when, and how long training would occur. Range Control would also work with the Municipality of Tinian to identify in advance holidays, festivals, or other important days for which public access is needed. Range Control may adjust range operating procedures for communication based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p>
69S	<p>2. Comprehensive Baseline and Ongoing Environmental Monitoring (with Public Transparency): Before any construction or training begins, conduct a comprehensive baseline survey of soil, groundwater, surface water (wetlands and coastal), and biota (fish, shellfish, reef sediment) for contaminants of</p>	<p>A description of the USMC’s Range Environmental Vulnerability Assessment program and how the program would serve to monitor the potential for off range migration of munitions constituents at the ranges on Tinian has been added to the Final EIS in Section 4.10.3 (Public Health and Safety). The Range Environmental Vulnerability</p>

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	<p>concern. Thereafter, implement a long-term monitoring program with sampling at least semi-annually (and more frequently during intensive training periods). Parameters should include: heavy metals, explosive residues (RDX, HMX, TNT, perchlorate), petroleum hydrocarbons, solvents, nutrients, bacteria (for water), etc. All monitoring locations and parameters should be decided in consultation with CNMI BECQ and local stakeholders. Crucially, the data from this monitoring must be made public in real-time. We recommend an online portal where test results are posted, and an annual independent audit of the data. If contaminant levels show a rising trend or exceed safety thresholds, an immediate investigation and remediation action is triggered, and related training activities pause until resolved. This monitoring regime should be funded by the DoD but executed or overseen by independent experts (for credibility). Trust must be earned through transparency.</p> <p>4. Enforceable Mitigation Agreements (Monitoring, Enforcement, Penalties): Good intentions in the EIS must be codified into an agreement – perhaps a Memorandum of Agreement (MOA) or similar, between DoD and the CNMI Government. This agreement would list each mitigation measure and how it will be enforced, including the role of local agencies. It should include clauses such as: “If monitoring indicates contamination X above Y level, DoD will cease the related activity and remediate to Z standard within T timeframe,” or “If DoD fails to perform ABC mitigation, it will fund an independent contractor chosen by CNMI to do it.” Essentially, create accountability. The agreement could also include financial assurances. For example, DoD could be required to post an environmental damage bond or establish a trust fund that CNMI could draw upon in case of remediation needs. This would alleviate the fear that the local government will be left holding the bag if things go wrong. Remember, promises of “cleanup later” are only as good as the funding and political will to execute them. We suggest an upfront commitment of resources for environmental management. There should be a monitor from the Mayors office and paid for by DOD to assure that all agreements, safety standards and training are adhered to.</p> <p>6. Community Engagement and Access Accommodations: Create a formal Community Liaison Office for CJMT activities on Tinian. Its role would be to communicate schedules, facilitate community requests (for land access when safe, etc.), and hear complaints or issues. The community should not be left wondering when and where they can go on their own island. At least a month in advance, publish training schedules (to the extent security allows) so that fishermen, farmers, and tour operators can plan around closures. If an important cultural or community event requires access to the MLA, the military should</p>	<p>Assessment program includes conducting an assessment to gain a better understanding of the potential transport of munitions constituents from the proposed live-fire range areas. This assessment would include modeling worst case scenario for munitions constituents migration to off range areas including where pathways could reach groundwater.</p> <p>As noted in the response to 69A, the DoD would fund a one-time hydrogeological study to establish baseline data that could be used to support monitoring of Tinian’s aquifer. This study would consist of groundwater sampling at existing well locations, and laboratory testing of water samples. In addition, the DoD would install up to four groundwater monitoring wells at each of the two live-fire ranges, establish a water monitoring plan, and include one year of baseline monitoring before ranges would become operational. The locations of wells would be determined in collaboration with CNMI Bureau of Environmental Quality (refer to Table 2.3-1 of the Final EIS).</p> <p>As noted in the response to 69C, annual CNMI Bureau of Environmental and Coastal Quality permitting requirements include reporting pumping volumes and water quality on a well-by-well basis. Based on this information, the Bureau of Environmental and Coastal Quality determines annually the allowable pumping volume for the following year. This requirement involves local expertise on groundwater quality and quantity and ensures that pumping is adapted to changing conditions.</p> <p>Commitments in the EIS Record of Decision and associated regulatory consultations ensure the USMC would comply with underlying federal laws and regulations related to the Proposed Action. Any issues concerning environmental contamination would be appropriately addressed under environmental programs consistent with underlying federal laws, regulations, and agreements.</p> <p>USMC has established comprehensive programs to ensure environmental accountability in conjunction with federal and local entities. All military personnel scheduled to train in the CNMI receive pre-deployment and on-island briefings that emphasize cultural awareness, protection of wildlife, and compliance with environmental regulations. These requirements are reinforced through unit-level training, Range Control procedures, and environmental protection protocols. The intent is to ensure that all personnel conduct themselves in a manner that respects the people, culture, and natural resources of the CNMI while carrying out training activities.</p> <p>Should training change significantly on Tinian or new information become available with respect to environmental concerns, per DoD NEPA procedures, additional NEPA review would be required.</p>

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	<p>adapt (e.g., halt training for that day at that location). The liaison office can coordinate this. Moreover, the DoD should consider funding certain community initiatives as goodwill – for example, improvements to public water infrastructure, scholarships for environmental science students from Tinian, support for cultural preservation projects – as offsets for the community’s burdens. While not a substitute for prevention, such investments show that the military understands it must give back to the host community.</p> <p>7. Periodic Review and Adaptive Management: The situation on Tinian should not be “set and forget.” We recommend that the CJMT activities be subject to a periodic environmental review – for instance, a comprehensive review every 5 years, with opportunity for CNMI and public input, to assess whether impacts are occurring as predicted, whether mitigations are working, and whether adjustments are needed. NEPA allows for supplemental EISs if new information arises. Committing to a periodic check-in effectively builds adaptive management into the project. If, after a few years, data show that, say, certain training activities are causing more environmental damage than anticipated (or community impact), then DoD must be willing to modify or curtail those activities. This could be formalized via an adaptive management plan in the EIS Record of Decision.</p>	
69T	<p>3. Strengthen Hazardous Material Controls and Emergency Response: All fuel storage and hazardous material storage on Tinian must have secondary containment and abide by CNMI siting regulations (e.g., no tanks near wetlands or shoreline per NMIAC §65-5-210). A detailed Spill Prevention, Control, and Countermeasure (SPCC) plan should be developed and shared with CNMI authorities, including designated response teams and equipment stockpiles on-island to respond to any fuel or chemical spill immediately. Drills for spill response should be conducted regularly with local participation. Additionally, establish a requirement that any unexploded ordnance found post-training (whether by military teams or civilians stumbling upon them) will be promptly disarmed and removed by DoD EOD units. There should be a 24/7 hotline for residents to report suspected UXO or contamination events, linked directly to a response mechanism.</p>	<p>Fuel storage tanks would be sited, constructed, and operated in accordance with applicable regulations. All required operational and emergency response plans would be developed and implemented with periodic training as required. UXO would be managed in accordance with DoD and USMC policies. Also, see the response to 69A above.</p>
69U	<p>5. Buffer Zones and Exclusion Areas: Identify and enforce specific buffer zones where no live- fire or destructive activities will occur. These should include: a buffer around Lake Hagoi and other wetlands (e.g., no demolition within a certain radius, and no soil disturbance that could alter the hydrology feeding the wetland); buffers around known cultural sites and historic structures (as discussed, perhaps a few hundred meters where appropriate, subject to expert</p>	<p>The Proposed Action includes ground and aviation training that would occur on-land on the island of Tinian. Any in-water training would continue as currently authorized under the Mariana Islands Training and Testing EIS/OEIS.</p> <p>As shown in Chapters 2 and 4 of the Revised Draft EIS (see Figures 2.1-3 and 4.4-4), areas that are proposed off limits to training include ecologically important areas on Tinian such as wetlands and Lake Hagoi, the former Tinian Mortar range, and other</p>

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	<p>recommendations); and marine protected zones (reefs that are off-limits to any landing or amphibious training to preserve marine life, potentially compensating by using already impacted areas like old WWII beachheads instead of pristine reefs). These spatial protections should be mapped clearly and treated as no-go zones in the Range Management Plan. Range Control must be trained to enforce them strictly, and violations should carry consequences (e.g., a unit that accidentally fires into an exclusion area must answer for it and assist in any damage assessment and restoration).</p>	<p>areas to protect natural and cultural resources. However, because green sea turtles are known to come ashore and nest on Tinian’s beaches, the USMC is consulting with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act regarding potential effects on nesting sea turtles and their terrestrial habitat. The consultation will be complete and incorporated, as appropriate, into the Record of Decision.</p> <p>In compliance with NEPA and the National Historic Preservation Act, the Revised Draft EIS analyzed impacts and effects on cultural resources, to include historic properties in Section 4.5. The Proposed Action would avoid impacts to cultural resources where possible and would not affect Traditional Cultural Properties.</p>
69V	<p>8. Contingency for Cumulative Build-up: Although this comment focuses on the CJMT EIS, we note that military activities in the Marianas have a way of growing (the divert airfield, possible future basing, etc.). It must be stated that Tinian cannot handle unlimited militarization without irreparable harm. Therefore, as a policy recommendation, any further expansion beyond what is in this EIS should trigger a fresh evaluation with the presumption that if carrying capacity is exceeded, it will not proceed. In other words, treat the CJMT as the maximum footprint, and enforce that through planning. This ties into the self-determination principle: the people of Tinian, through their elected leadership, should have a decisive voice if any changes or intensification is proposed down the line.</p> <p>Each of these recommendations is made in the spirit of constructive, proactive protection. We do not oppose national defense needs; rather, we insist that defense not come at the cost of Tinian’s destruction. The above measures, if adopted, would go a long way toward assuring the community that the CJMT can be compatible with our island’s future. Without them, however, the EIS remains a document of unfulfilled assurances.</p>	<p>Military training in the Military Lease Area is provided for in the 1975 Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America (“the Covenant”), and Technical Agreement Regarding Use of the Land to be Leased by the United States in the Northern Mariana Islands (“Technical Agreement”), and associated lease, the first of which was signed in 1983.</p> <p>As noted in the response to 69S, should training change significantly on Tinian or new information become available with respect to environmental impacts, additional NEPA review would be required.</p>
70A	<p><b>Cultural Resource Destruction and Irreplaceable Heritage</b></p> <p>Section 3.5 of the RDEIS catalogs Tinian’s cultural resources in a dry, technical manner, failing to convey their living significance. The document notes that 344 historic properties lie within the area of potential effects, spanning prehistoric Chamorro sites, Spanish colonial remnants, Japanese-era farmsteads and shrines, and World War II battle sites. This includes the entire North Field area – a National Historic Landmark designated in 1985 due to its pivotal role in World War II. Yet nowhere does Section 3 truly acknowledge what these places mean to the people of Tinian. These are not just “properties” on a list – they are sacred landscapes of memory, identity, and grief.</p>	<p>In compliance with NEPA and the National Historic Preservation Act, the Revised Draft EIS analyzed impacts and effects on cultural resources, to include historic properties in Section 4.5. Both NEPA and the Section 106 process of the National Historic Preservation Act include opportunities for the public, interested parties and the members of the community, including those of Chamorro and Carolinian descent, to identify cultural resources to include historic properties and potential effects as well as comment on the assessment of effects and proposed mitigation. The Section 106 consultation was conducted in good faith with the CNMI Historic Preservation Office, the Advisory Council on Historic Preservation, the National Parks Service, and the Municipality of Tinian and the public. The Proposed Action would minimize adverse</p>

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	<p>Many sites face destruction or degradation under the proposed action. For example, the RDEIS identifies three Traditional Cultural Properties – the fishing areas of Unai Chulu, Unai Dankulo, and Puntan Masalok – which are critical to Chamorro subsistence and cultural identity. Generations of Tinian families have practiced traditional net and spear fishing at these sites, teaching youth the values of respect (respect) and inafa’maolek (harmony and mutual aid) through communal fishing events. Section 3 makes no mention of how militarization might sever this intergenerational bond. If access is restricted or the tranquility of these coastal areas is shattered by training, those cultural practices and values cannot be passed on – an omission that is alarming in an EIS purporting to describe the “existing environment.” The cultural fabric of Tinian is woven into its land and seascapes, from fishing spots to farm homesteads, and any disruption must be acknowledged as a grave impact.</p> <p>Even more troubling, Section 3 glosses over sites of immense historical trauma. Tinian’s lands bear witness to wartime tragedies that demand solemn respect, not more violence. The Suicide Cliffs area on the Carolinas Heights plateau, for instance, saw desperate civilians and soldiers take their own lives in 1944 rather than surrender. Oral histories recount these events with pain that still resonates today, offering “information and sentiments inaccessible to archaeological inquiry alone”. Yet the RDEIS reduces such locales to sterile entries in an appendix. Nowhere does it mention that these grounds are effectively hallowed by sacrifice or question the propriety of turning them into a modern war training backdrop. This omission is a disservice to history and to the descendants of those who perished.</p> <p>Another example is Liyang Mohlang, a cave complex used as a refuge by Okinawan and Chamorro civilians during World War II. Archaeologists have documented that Liyang Mohlang sheltered dozens of people and still contains human skeletal remains alongside relics of daily life and conflict(1). A small concrete shrine with giant clam shells now stands near its entrance, overgrown but testifying to the reverence locals hold for this site of suffering and survival(2). Section 3 fails to highlight sites like Liyang Mohlang as anything more than “caves” or “archaeological sites.” This is a critical omission: such places are part of the living cultural heritage of Tinian’s people. They are pilgrimage sites, outdoor classrooms, and memorials all in one. If military training activities damage or deny access to these caves and other historic sites, it would irreparably erase chapters of Tinian’s story that cannot be rewritten. No amount of mitigation or data recovery can truly compensate for the loss of cultural context and spiritual connection once a site is bulldozed or blasted.</p>	<p>effects and there would be less than significant impacts to cultural resources to include Traditional Cultural Properties and places of cultural importance.</p> <p>The Proposed Action does not include any new training at the three known Traditional Cultural Properties. Impacts to public access were analyzed in Section 4.1 of the Revised Draft EIS. The Proposed Action would accommodate public access to the Military Lease Area and allow for flexibility in scheduling military training. To achieve this, the Military Lease Area would be divided into eight smaller, separate training areas that may be scheduled individually or several at a time. The public would be allowed access to those training areas not scheduled for military training when they can be safely accommodated. In fact, some training could be conducted without any controls on public access. However, during some training events, public access may be limited for the safety of the public and service members participating in the training. It is the intent of the USMC to allow, when possible, public access to recreational beaches, tourism areas, and the North Field National Historic Landmark.</p> <p>Liyang Mohlang and Suicide Cliffs are located outside the Proposed Action area. For the analysis of potential effects of the Proposed Action on socioeconomics, including potential impacts to social cohesion, please refer to Section 4.3 of the Revised Draft EIS.</p>

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	<p>Finally, Section 3’s cursory treatment of cultural resources does not convey the full magnitude of threat posed by the proposed action. The RDEIS mentions legal obligations to protect historic properties and National Historic Landmarks, implying that the military will “minimize harm” to Tinian’s heritage. But this rings hollow. Even “minimized” harm is still harm – often permanent. When limestone forests are cleared or earth is moved, archaeological layers are destroyed forever. Artefacts and human remains, once dislodged from their context, lose much of their meaning. Section 3 provides no honest reckoning with the fact that once a cultural resource is damaged, it cannot be truly restored. The people of Tinian know this well. They have seen how war remnants linger – for example, a former mortar range on the northwest coast (used from 1945 to 1994) remains fenced off as an UXO cleanup site today. This is land that, due to past military use, has been effectively lost to the community for generations. We cannot accept another cycle of destruction. Tinian’s cultural sites from prehistoric latte stone locations to World War II bunkers and civilian shelters must be preserved in situ as much as possible, not treated as expendable commodities in a training plan.</p> <p>FOOTNOTES (1) uog.eduuog.edu (2) uog.edu</p>	
70B	<p>Noise Pollution – Underestimated Impacts on Health and Sacred Spaces</p> <p>Section 3.8 attempts to describe Tinian’s existing noise environment, but its characterization is misleading and fails to appreciate how noise from increased training will impact both health and cultural life. The RDEIS notes that Tinian’s ambient soundscape is typical of a small Pacific Island – largely natural quiet, with sounds of wind, waves, and wildlife dominating undeveloped areas. Only near the airport or during occasional exercises at North Field does the island experience “moderately noisy or occasionally loud” human-made sounds. In other words, peace and quiet is the norm for Tinian, punctuated only infrequently by military activities. This baseline should be treated as a precious community asset – the serene acoustic environment is integral to Tinian’s rural lifestyle and to the sanctity of its cultural sites. Yet the RDEIS does not emphasize how disruptive the Proposed Action would contrast with this baseline. Describing the island as having “moderately noisy” moments downplays just how jarring and intrusive the planned noise would actually feel to residents who treasure the current tranquility.</p>	<p>The Revised Draft EIS Section 4.8 (Noise) provided a comprehensive analysis of potential noise impacts from proposed training. Section 3.8 and Appendix J of the Revised Draft EIS discuss the USMC’s approach to analysis. Potential noise generated during ground and aviation training events was modeled by the USMC using noise modeling software approved for DoD use. Furthermore, the methodology and metrics used for evaluating potential noise impacts associated with the Proposed Action were developed based on guidance from the Department of Defense Noise Working Group. The noise study contained in Appendix J utilized a combination of single event and average noise metrics. The noise study analyzed estimated peak sound levels for representative weapons and ammunition that would be used at the Multi-Purpose Maneuver Range. Range Control would provide advance notice to the community of the training schedule and types of noise that may be heard, and public access to the training areas affected would be controlled. Specifically, the surface danger zone around the Multi-Purpose Maneuver Range where the 104 decibel contour overlaps is within Training Area D and public access to this training area would be controlled. Thus, members of the public would not be present in areas that would experience peak sound levels above 104 decibels. Peak sound levels up to 104 decibels would reach as far as the southernmost runway at North Field and extend over the waters north and</p>

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	<p>Critically, Section 3’s discussion uses average sound levels and generic descriptors that mask the true impact on human well-being. The document provides typical ambient noise levels (indicating, for instance, ~44 dB in rural fields and ~55 dB in residential areas as day-night averages). However, by focusing on averages, the analysis ignores the real issue: the single-event peaks and the qualitative intrusion of military noise into daily life. Tinian residents won’t experience “average” noise – they will experience sudden fighter jet flyovers, booming explosions, and continuous drone of heavy machinery during exercises. These peak events are severe. According to the RDEIS’s own data, a single F-18 or F-35 fighter operating at 2,000 feet above North Field produces maximum noise levels of about 102–104 decibels on the ground. That is extremely loud – well above the 90 dB level of a heavy truck and nearing the threshold of pain. It is the kind of noise that startles the heart, rattles windows, and can cause physical discomfort and hearing damage with repeated exposure. Even at higher altitudes or smaller aircraft, military planes are in the 80–90+ dB range over Tinian, not to mention the impulsive blasts from any demolitions or gunnery (which carry unique health effects). Section 3 offers none of this context in plain terms. It does not acknowledge that many of these sounds “begin to become uncomfortable above 120 dB” and that even 65–90 dB can be “moderately loud” to “very loud”. Such technical language obscures the lived experience: even occasional military noise at these levels can distress and disturb human beings and wildlife alike. The omission of health impacts is especially glaring. Modern research links chronic or frequent loud noise exposure to stress, sleep disturbance, cardiovascular issues, cognitive impairment in children, and other health problems. Tinian’s small community (with many elders and children) would be especially vulnerable to these effects, yet Section 3 reads as if noise were only an issue if it exceeds some regulatory threshold for hearing loss. This is unacceptable. Quiet is a foundation of public health and mental well-being on the island. Islanders are not abstract “receptors” – they are people who will endure anxiety when warplanes roar overhead unexpectedly, and who will lose sleep when nighttime training operations break the stillness (the RDEIS notes a 10 dB penalty is added for night noise in metrics, but it fails to say that Tinian’s people will be jarred awake by these exercises). Cultural and religious practices also require quietude: consider that visiting ancestral graves, saying prayers at a shrine, or holding commemorative events at sites like Suicide Cliffs all demand a peaceful atmosphere. Section 3 does not address how sacred moments could be interrupted by the rumble of a low-flying military helicopter or the echo of gunfire. To island residents, such intrusions are not merely “annoyances” – they are experienced as desecration and disrespect.</p>	<p>northwest of Tinian. At these levels, sound may cause a startle effect and would be considered moderately likely to produce annoyance especially for people who are not accustomed to hearing gunfire noise.</p>

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	<p>Community members have consistently raised noise as a top concern, yet the RDEIS’s existing environment section remains tone-deaf to these warnings. At a public meeting in June 2025, Tinian residents highlighted “noise” among their five greatest worries about the CJMT proposal (along with water, waste, strain on emergency services, and land access)(3). This aligns with the over 30,000 public comments submitted on the 2015 draft EIS, in which protection of peace and quiet was a recurring theme that forced the military to at least scale back the loudest activities (e.g. removing artillery and bombing from the plan)(4). Yet even absent those large munitions, the current proposal’s noise will be far from benign. Section 3 should have frankly stated: Tinian today is a quiet island with a treasured quality of life for its 2,000 residents and any increase in military noise threatens to fundamentally degrade that quiet, with broad ripple effects on health, culture, and daily living. By failing to say this, the RDEIS minimizes a core impact. In truth, the sound of militarization is itself a form of cultural damage: it drowns out the songs, stories, and solace that define island life.</p> <p>FOOTNOTES</p> <p>(3) islapublic.org</p> <p>(4) islapublic.org</p>	
70C	<p><b>Air Quality Degradation and Aquifer Risks</b></p> <p>Section 3.9 describes Tinian’s air quality as “in attainment” with all national standards, which is accurate but hardly the whole story. Tinian currently enjoys exceptionally clean air because of its remote oceanic location, constant Tradewinds, minimal industry, and sparse population. No air pollutant monitoring stations exist on-island (the CNMI’s environmental agency doesn’t even track Tinian’s air daily, due to the low emissions). In short, the air Islanders breathe is about as pure as it gets in today’s world. The RDEIS acknowledges this baseline but then takes a complacent tone, implying that nothing in the CJMT plans will violate Clean Air Act standards. This legalistic approach misses the real concern: any deterioration of air quality is a direct hit to the community’s health and environment, and certain pollutants of concern don’t have safe thresholds at all (e.g. fine particulates, hazardous air toxins). Section 3 fails to convey how the proposed training – with its construction dust, vehicle convoys on unpaved roads, diesel generators, open burns, and munitions residue – could generate locally significant air pollution even if technically within regulatory limits on an annual average basis.</p> <p>One major omission is the discussion of particulate matter and dust. Military training invariably kicks up dust: heavy trucks erode dirt roads, cleared</p>	<p>Section 4.9 (Air Quality) and Appendix K (Air Quality Emissions Calculations) of the Revised Draft EIS discussed impacts from air emissions including dust emissions and included details on the required control methods. Although there would be temporary increases in particulate matter and dust, the long-term exposure to communities such as San Jose, which is more than 5 miles south of the Military Lease Area, would be less than significant. This is because of the distance of sensitive receptors from the training area and prevailing wind conditions on Tinian, as discussed in Section 3.9 (Air Quality) of the Revised Draft EIS. According to EPA (August 2014), “The highest concentrations of roadway pollutants occur on or just downwind of a roadway. With greater distance from a roadway, concentrations generally decrease to background levels within 500-600 feet.”</p> <p>Text has been added to Section 2.1.11 (Phased Implementation of Construction and Training) of the Final EIS to clarify that construction projects would occur intermittently over 10 to 15 years and would not occur continuously over that timeframe. Also, as noted in the Revised Draft EIS, training would be intermittent in any given year. Considering the intermittent nature and distance of both construction and training from residential populations, less than significant air quality impacts are expected.</p>

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	<p>vegetation leaves bare soil prone to wind erosion, and ordinance blasts create pulverized debris. The RDEIS does not describe current particulate levels on Tinian (likely very low), nor does it contextualize how sensitive the island’s ecosystem and population are to increases in dust. We remind decision-makers that Tinian has one hospital/clinic and a high rate of respiratory ailments would be devastating in this community. Fine dust (PM<sub>10</sub> and PM<sub>2.5</sub>) can lodge in lungs and trigger asthma, bronchitis, and other issues. Yet Section 3 simply lists the existence of national standards and asserts compliance. Nowhere does it note, for example, that Tinian’s east-to-west prevailing winds would carry dust and smoke from training areas in the north directly down toward San Jose village in the south, potentially blanketing the only settlement with haze.</p>	
70D	<p>Even more critical is the risk to TINIAN’S ONLY AQUIFER, which Section 3 almost entirely sidesteps. Tinian’s groundwater (a fragile lens in porous limestone) is literally the only source of drinking water for the island’s residents and agriculture. The RDEIS’s Chapter 3 does describe basic groundwater conditions elsewhere, but when discussing air quality and soil deposition it fails to link these to aquifer vulnerability. This is a glaring oversight: pollutants emitted to air will eventually settle onto the land or water. On a limestone island, anything that settles on the ground – be it particulate fallout from explosions, leaked fuel or chemicals evaporating and re-depositing, or even lead dust from spent ammunition – can infiltrate rapidly to the water table with the next rains. There is no mention in Section 3.9 of the island’s designation of a Class I Groundwater Protection Zone, yet the Proposed Action’s own description (Chapter 2) notes that THE TRAINING RANGES WOULD DIRECTLY OVERLIE TINIAN’S CLASS I AQUIFER RECHARGE AREA(5) (the highest protection category for a sole-source aquifer). This means the very ground that would be trampled, cratered, and potentially contaminated by training is the same ground that catches the rain to feed our wells. Section 3 should have highlighted this precarious linkage in any discussion of air and soil quality. Instead, it gives the false impression that air emissions stay in the air or disperse harmlessly. The truth is, what goes up will come down, on our farms, into our streams, and through the karst bedrock into our drinking water.</p> <p>The RDEIS attempts to reassure that impacts to groundwater quality will be “less than significant(6)” but we find that conclusion unjustified and dangerously dismissive. What does “less than significant” mean when it’s our only aquifer at stake? One spill of a hazardous material, one mistaken release of toxins, could poison water supplies for decades. The existing environment section does note that current military fueling is done with precautions (diesel stored in impervious berms, spill plans in place). While this might sound</p>	<p>The Groundwater Modeling Technical Memorandum in Appendix M (Utility Studies) of the Revised Draft EIS discussed the low-permeability Tinian pyroclastic rocks (Figure 11) and showed low hydraulic conductivity in this area (Figure 15), meaning poor water transmission.</p> <p>At the request of CNMI, the DoD would fund a one-time hydrogeological study to establish baseline data that could be used to support monitoring of Tinian’s aquifer. This study would consist of groundwater sampling at existing well locations, and laboratory testing of water samples. In addition, the DoD would install up to four groundwater monitoring wells at each of the two live-fire ranges, establish a water monitoring plan, and include one year of baseline monitoring before ranges would become operational. The locations of wells would be determined in collaboration with CNMI Bureau of Environmental Quality. (please see Table 2.3-1 of the Final EIS).</p> <p>As noted in Section 4.11.3.2 (Wastewater Treatment) of the Revised Draft EIS, the proposed site for the Base Camp site does not appear to be within either a Class I or II Aquifer Recharge Area/Groundwater Protection Zone on Tinian (CNMI Bureau of Environmental and Coastal Quality 2025). The Explosives Training Range is located over impervious geology and is not part of the Class I or II Aquifer Recharge Area/Groundwater Protection Zone. The Multi-Purpose Maneuver Range is located outside of freshwater lens (Appendix M, Groundwater Technical Memorandum, Section 5.10).</p>

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	<p>comforting on paper, in practice it is no guarantee against accidents – especially with a dramatic uptick in activity. Human error, extreme weather, or unforeseen mishaps (such as munitions causing secondary fires or chemical releases) can defeat the best-laid spill prevention measures. Section 3 does not convey the gravity of that risk. It also does not mention that Tinian’s karst groundwater has historically been contaminated by past activities – for instance, decades of agricultural chemical use and leftover munitions have left hotspots of concern noted as early as a 1997 Environmental Baseline Survey. If anything, this history proves that once pollutants get into the ground, they linger and they spread beyond the ability of a small island government to remediate. The RDEIS should have openly stated that any contamination of the sole-source aquifer would be irreversible on a human timescale and catastrophic for the community. Instead, we get complacency.</p> <p>In sum, the “Air Quality” section of Chapter 3 falls far short of informing the public about how the Proposed Action endangers the pristine air and pure water that the people of Tinian depend on. We urge the decision-makers to recognize that compliance with EPA standards does not equal safety in a context as unique and vulnerable as Tinian. The island’s size and single aquifer leave no room for error. Clean air and water are literally life for us – far more valuable than any training objectives – and they must not be compromised.</p> <p>FOOTNOTES</p> <p>(5) <a href="mailto:cnmijointmilitarytrainingeis.com">cnmijointmilitarytrainingeis.com</a></p> <p>(6) <a href="mailto:cnmijointmilitarytrainingeis.com">cnmijointmilitarytrainingeis.com</a></p>	
70E	<p>Deterioration of Quality of Life and Socioeconomic Well-Being</p> <p>Perhaps the most heartbreaking deficiency of Section 3 is its failure to articulate what is truly at stake for Tinian’s people: our very way of life and our future on this island. Tinian is not just a tract of land to its residents. It is home, heritage, and the only economic base we have ever known. The RDEIS’s Socioeconomics section (3.3) provides statistics – population 2,044 in 2020, high unemployment and over 30% of residents below poverty line – but it offers no human context or sense of urgency about how the military buildup could exacerbate our struggles. The document notes correctly that no military personnel are permanently stationed on Tinian (aside from a rotating Seabees detachment) and that typically 1,000 service members come for a few weeks during major exercises like Valiant Shield. What it fails to conclude from this is that Tinian’s residents are effectively on our own. The forces that conduct training here are temporary visitors – they bring some short-term spending, yes,</p>	<p>The USMC is proposing to establish an expeditionary Base Camp on Tinian to support proposed training activities all of which would occur exclusively within the Military Lease Area. The Proposed Action does not involve construction of permanent military bases, housing, or entertainment facilities, nor does it authorize or promote private commercial development.</p> <p>The Revised Draft EIS evaluated potential social and economic effects of the proposed training, including population fluctuations, demand on public services, and land-use compatibility (see Section 4.3, Socioeconomics, Section 4.10, Public Health and Safety, and Section 4.2, Land Use and Recreation).</p> <p>All military personnel scheduled to train in the CNMI receive pre-deployment and on-island briefings that emphasize cultural awareness, protection of wildlife, and compliance with environmental regulations. These requirements are reinforced through unit-level training, Range Control procedures, and environmental protection</p>

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	<p>but they do not settle, they do not pay taxes year- round, and they will not be here to help when negative impacts of training manifest down the road. Section 3 should have noted this fundamental asymmetry: the people bearing the long-term risks (locals) are different from those gaining the short-term benefit (military units).</p> <p>In reality, the CJMT proposal threatens to undermine Tinian’s sustainable livelihood and degrade our already fragile standard of living. Section 3 acknowledges that Tinian’s economy is “primarily driven by tourism and commercial agriculture” with subsistence activities playing a vital role. But nowhere does it connect the dots: militarization directly conflicts with both tourism and agriculture, and even with subsistence. Who will visit “America’s World War II Heritage City” (a designation Tinian proudly received) if the island is synonymous with live-fire ranges and jet noise? How can farmers plan crops when large swaths of public land may be periodically closed or impacted by training? Tinian’s people rely on the land and sea for survival to an extraordinary degree – one 2018 survey estimated that over half (53%) of the average Tinian resident’s diet comes from locally sourced food (fishing, farming, hunting, foraging). This reflects not only economic necessity but a deep cultural preference for self-reliance and traditional foodways. Section 3’s socioeconomics baseline details the prevalence of subsistence farming and fishing, yet the RDEIS never discusses how increased training could curtail these activities (through restricted access, resource damage, or contamination scares). For a community with limited cash income and high poverty, losing free access to wild foods or arable land isn’t just an inconvenience – it’s a threat to food security. Nowhere does Section 3 state the obvious: If Tinian’s environment is polluted or off-limits, many residents literally will not eat. This is an unforgivable omission in a document meant to inform decision-making.</p> <p>Furthermore, the social and cultural cohesion of our community is at stake. The RDEIS makes passing mention of Chamorro and Carolinian cultural values – for instance, it cites the concept of inafa’maolek (to make things good, live in harmony) as a core value that nurtures strong community ties on Tinian. Ironically, nothing could be more at odds with inafa’maolek than the imposition of militarization that divides families from their land and forces an atmosphere of conflict (even simulated conflict) onto a peaceful island. Likewise, the document notes that Carolinian concept of tipiyeeew (being of one mind) fosters unity and shared identity. How will our community maintain “one mind” when half of our island is turned into a gated training zone and our people are psychologically torn between serving external military interests and protecting their home? The RDEIS offers no insight into this looming social strain. Many</p>	<p>protocols. The intent is to ensure that all personnel conduct themselves in a manner that respects the people, culture, and natural resources of the CNMI while carrying out training activities. DoD service members are held to a high standard of conduct, and the DoD would act promptly and rigorously to curtail any misconduct and enforce laws to protect citizens.</p> <p>.</p>

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	<p>of us have no other home to go to – this is not hyperbole. Unlike military personnel who rotate in from across the United States, Tinian’s indigenous Chamorro and Carolinian families have deep roots here and only here. We cannot uproot ourselves to escape the noise or find another place to practice our culture. As Section 3 quietly notes, about 91% of Tinian’s indigenous population is Chamorro, and over 74% of residents speak a language other than English at home (Chamorro or Carolinian among them). These statistics imply a community that lives a distinctive Pacific Island lifestyle, not easily transplanted into the Western world. If our lands and waters are spoiled, we face either displacement (with likely cultural loss in diaspora) or diminishment (staying but suffering in a degraded homeland). Neither is acceptable. The RDEIS Section 3 should have squarely addressed this existential threat to the people of Tinian.</p>	
71A	<p>As a community member and local to Saipan, I highly oppose the CNMI joint military training draft environmental impact statement. I deeply care for these islands, including the environment and its people. The proposed plans have insufficient community dialogue and engagement, with many community members not being aware of these plans as well as having sufficient information on the plans. The open session held on Saipan did not take into account public dialogue and conversation, instead pushing forward these plans with language of it being in progress rather than subject to review.</p> <p>There are also significant threats to marine life and wildlife through noise pollution, military testing, and continued build up. These plans limit public access and disregard the needs of our people in favor of military interest.</p> <p>Additionally, there may be impacts on historical sights that have significant cultural meaning. The CNMI being “strategically positioned” is not a reason to disregard the native communities, continue to take land and access from local residents, and continue to deny the sovereignty of the Chamorro and Carolinian people of the Marianas. As a CNMI resident, my comments are highly against the proposed plans. The draft EIS requires significant review on its harmful impacts and must to be rejected.</p>	<p>In developing this Proposed Action, the USMC evaluated the changes in the way U.S. Armed Forces currently prepares for future conflicts and carefully considered the comments and suggestions submitted on the 2015 Draft EIS/OEIS by elected officials and government agencies of the CNMI, federal agencies, the public, and collaborative interagency coordination. The USMC’s proposed training concept for the Military Lease Area on Tinian recognizes the importance of minimizing the impacts of military training on the residents of Tinian. First, the training concept was purposefully designed to locate live-fire ranges within the northern portion of the island, away from the village of San Jose, recreational beaches, tourism areas, and cultural and natural resources. Second, understanding that public access to the Military Lease Area was important to the community, the Marine Corps identified the establishment of an on-island Range Control to foster communication between the community and military to allow access to the Military Lease Area when it could be safely accommodated, even during ongoing training events.</p> <p>After developing this training concept, the Marine Corps engaged the CNMI government in a series of virtual and in-person discussions on a revised training concept and revised environmental analysis between January 2020 and September 2024. In August 2023, the USMC held public information sharing sessions on the islands of Tinian, Saipan, and Rota to inform the public at large of the revised training concept.</p> <p>The Revised Draft EIS provided a comprehensive analysis of potential environmental impacts resulting from the Proposed Action.</p> <p>The USMC is consulting with the U.S. Fish and Wildlife Service and the National Marine Fisheries Service under Section 7 of the Endangered Species Act to ensure</p>

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		<p>compliance with federal law. These consultations will be complete and incorporated, as appropriate, into the Record of Decision.</p> <p>The USMC is consulting with CNMI Historic Preservation Office under Section 106 of the National Historic Preservation Act. The analysis presented in the Section 106 consultation and the Revised Draft EIS accounted for cumulative and indirect effects to cultural resources and historic properties, including blasting and vibration impacts. The Proposed Action sited training areas to minimize the potential to adversely affect cultural sites, their character-defining features, and setting (where setting is character-defining and significant to the site’s cultural importance).</p>
73A	<p>It should be noted, however, that because there is no significant difference between Alternative 1 and 2, this brings to question whether this EIS actually satisfies NEPA requirements for ‘reasonable’ alternatives, considering the main difference between Alternative 1 and 2 is tempo in training, despite the environmental impacts being similar. It is questionable for impacts from construction, live-fire training ranges, and issues related to housing, infrastructure, and solid waste to remain the same when training is expected to decrease with Alternative 2. The two alternatives provide the people of Tinian with little options in terms of what is being proposed. Therefore, in recognition of the potential for harm to the environment and community in Tinian, as well as the lack of reasonable alternatives to the PA, I write in opposition to it and urgently request the Department of Defense (DOD) and U.S. Marine Corps (USMC) to consider the “No Action Alternative,” which still leaves significant room for already existing ground, aviation, amphibious, and non-live-fire training in the Military Lease Area as it has for decades.</p> <p>It is unclear how the determination of ‘No Impact’ or ‘Less Than Significant Impact’ was made in addition to an inadequate assessment of cumulative impacts on the community and environment in Tinian and the broader Marianas. Hundreds of millions of dollars are projected to be spent for this Proposed Action, with little justification for training in Tinian in the first place. Tinian in itself does not have environmental conditions or terrain that offer new experiences or learning opportunities for military training.</p> <p>Overall, there seems to be no sound scientific basis that supports the determination of ‘no impact’ or ‘less than significant impact.’</p> <p>Throughout the entirety of the EIS, impacts on different aspects of Tinian are described, yet the EIS contradicts itself when actions are then deemed not impactful. These conclusions remain questionable, because of the inherent conflict of interest between the desires of USMC for military expansion on one</p>	<p>Consistent with requirements under NEPA, including case law, the USMC developed and considered alternatives that meet the purpose and need as described in Section 1.2 of the Revised Draft EIS. Alternatives for the Proposed Action include two different training intensities that meet the USMC’s purpose and need (see Section 2.2 Alternatives Considered and Evaluated). An explanation for other alternatives that were considered but not carried forward is provided in Section 2.4.</p> <p>DoD training requirements and staffing are variable and would be met with either alternative, but the higher amount of training proposed under Alternative 1 (15 percent over baseline, versus 5 percent over baseline for Alternative 2) would allow greater flexibility to meet training requirements. Impacts from construction are identical between the two alternatives because the same training infrastructure is required to support proposed training activities under either alternative. The selection of an alternative by the decisionmaker will be based on the USMC’s requirements to fulfill its mission along with a review of all relevant facts, impact analyses, and comments received during the EIS public participation process.</p> <p>Please see Section 1.1 of the Revised Draft EIS for a discussion of why Tinian is an important training location for DoD and why the USMC is proposing additional training on the island.</p> <p>The Revised Draft EIS provided a comprehensive analysis of potential environmental impacts resulting from the Proposed Action based on best available science, which included a qualitative and quantitative approach. Significance determinations are within the discretion of the federal agency. Where impacts are quantifiably distinct, the results are presented, as with air quality (see Tables 4.9-3 through 4.9-9 and Tables 4.9-10 through 4.9-12 for the estimated emissions for Alternatives 1 and 2, respectively). For other resources, the USMC determined the difference between the alternatives would be more subtle, such as for public access (see Section 4.1.3 and 4.1.4 for the impact analysis of Alternatives 1 and 2, respectively).</p>

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	<p>of smallest land masses with a high biodiversity richness and the presence of endemic endangered and threatened species. In addition to sound scientific basis, genuine consultation must be implemented with the indigenous people and residents of Tinian population, who have a direct stake in cultural resources, access to public space, subsistence cattle ranching, fishing, tourism, and other resources.</p>	<p>Under either alternative, training events would necessitate temporary and controlled access restrictions for public safety within the Military Lease Area. Range Control would apply the same process under both Alternative 1 and Alternative 2 to work with the CNMI government and Municipality of Tinian so that training is scheduled to minimize disruptions. The community would have advance notice of where, when, and how long training would occur, and access limitations would be temporary and intermittent. For resources such as housing, infrastructure, and solid waste, the analysis under Alternative 1 evaluated the impacts resulting from the higher training tempo in detail. The impacts for these resources under Alternative 2 (5 percent increase over baseline) are thus described to have similar, but fewer, impacts to those for Alternative 1 (15 percent increase over baseline).</p> <p>Consistent with requirements under NEPA, including case law, the Revised Draft EIS (Section 4.15, Cumulative Impacts) evaluates the combined effects of the Proposed Action with other ongoing and reasonably foreseeable military activities in the Marianas region, including the Mariana Islands Training and Testing (MITT), Guam and CNMI Military Relocation, and other DoD activities. The Revised Draft EIS cumulative impacts analysis utilized the most current regional data available at the time of publication and included potential socioeconomic, environmental, and resource-related effects.</p>
73B	<p>Military Expansion in the Pacific Region and the Socioeconomic Costs for Tinian.</p> <p>According to the EIS, multiple military trainings and projects have occurred within the Marianas since 1999, including the Mariana Islands Range Complex (2010), MITT (2015/2020), the Guam and CNMI Military Relocation (2010 &amp; 2012), U.S. Air Force Divert Activities and Exercises, and the ACE/Agile Reaper 23-1 exercise (2023). Other activities not mentioned in this EIS include the annual Cope North exercises, Guam Flight Test (2024), Resolute Force Pacific 2025 (REFORPAC) exercises, and Valiant Shield exercises every other year, etc. Several of these activities did not require input by the people of the Marianas before occurring, yet all of them create incremental impacts on the environment, natural resources, air quality, and the communities in the CNMI and Guåhan. The overall impact of these activities are not thoroughly assessed by this EIS, creating information gaps in what should be a total and comprehensive impact analysis. Multiple ongoing military projects and trainings in the Marianas region create compounding issues that this EIS does not fully address. Instead, the EIS concludes that the PA will result in mostly either ‘no impact’ or ‘less than significant impact,’ to multiple aspects of life in Tinian.</p>	<p>As noted in the response to 73A, Section 4.15, Cumulative Impacts of the Revised Draft EIS evaluated the combined effects of the Proposed Action with other ongoing and reasonably foreseeable military activities in the Marianas region, including the Mariana Islands Range Complex, Mariana Islands Training and Testing (MITT), Guam and CNMI Military Relocation, and other DoD activities. The Revised Draft EIS cumulative impacts analysis utilized the most current regional data available at the time of publication and included potential socioeconomic, environmental, and resource-related effects.</p> <p>Also, consistent with requirements under NEPA, including case law, the Revised Draft EIS considered mitigation (management measures) to address potentially significant impacts. Section 4.3 (Socioeconomics) described that the Proposed Action could result in a significant impact to fishers and boaters from the temporary and intermittent activation of the surface danger zone that would extend over the waters north of Tinian during live-fire training at the Multi-Purpose Maneuver Range. There is no legal authority to compensate mariners for extra travel due to the establishment of the surface danger zone; however, the USMC is committed to minimizing disruptions by providing timely public notification (via U.S. Coast Guard Notice to Mariners and other channels), as described in Section 2.1.6.2 of the Revised Draft EIS.</p>

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	<p>Additionally, there are hardly any mitigation plans in place to address areas where significant impacts are actually identified.</p> <p>The EIS responds to the issue of restricted fishing and boating (a large part of Tinian’s subsistence lifestyle) by stating that “there would be a modest economic and employment benefit from training, operation and maintenance of the Military Lease Area Range Complex by Range Control, and construction” (ES-7, Abstract and Executive Summary). In Chapter 4, the EIS points to infrastructure improvements that could encourage tourism and provide indirect benefits from the secondary spending from incoming military personnel and construction workers. In comparison to the long-term costs due to tourism loss, threats to local food security, ecosystems, and culture, and potential contamination posed by the military buildup, the expansion’s “cumulative minor to moderate beneficial economic impact” seems negligible.</p> <p>These claims regarding the potential for economic benefit remain unsubstantiated. The EIS mentions that the USMC is unable to estimate the number of days or specific locations of access controls throughout the year and therefore cannot determine specific economic impacts like potential gain or loss in revenue, job titles/salary, construction costs, and potential economic expenditures, etc. In terms of economic benefit, the EIS identifies only 28 people in Tinian that could potentially be employed to Range Control based on past employment/support. No suggestion is made for local hiring or workforce development for the up to 50 construction workers needed over the 10 to 15 year period. The USMC should consider local training and hiring for the 50 proposed construction workers needed, to boost the local economy and to avoid issues related to workforce housing.</p> <p>Despite pointing to future economic benefits for Tinian and the CNMI, no large economic benefit or revenue gain is actually identified. However, it is made incredibly clear that the PA will have significant impacts on Tinian’s subsistence and commercial agriculture, fishing, cattle raising/local meat industry, hunting and foraging of wild game, access to traditional medicine, and public access to WWII and cultural memorials, sacred sites, locations for large traditional events, beaches and the ocean, and other recreational areas necessary for Tinian’s primary economic driver: tourism. Overall, the PA poses long-term negative impacts to Tinian’s economy that temporary military funds cannot fix or sustain in the long-term.</p> <p>Furthermore, a Tinian resident has claimed that:</p> <p>The U.S. military presence has brought in a significant amount of federal funding, but little of it goes to community development. The people of Tinian</p>	<p>To further offset the significant impact to subsistence fishers, the Final EIS has been updated in Table 2.3-1 to include the following proposed management measure:</p> <ul style="list-style-type: none"> <li>• The DoD would work with CNMI to identify federal programs or funding sources needed to support the siting and installation of fish aggregating devices to offset the impacts to subsistence fishers.</li> </ul> <p>While the USMC has determined there would be less than significant impacts for all other resource areas, management measures have been proposed to further minimize impacts (please see Table 2.3-1 of the Final EIS). The EIS Record of Decision will describe final commitments to mitigate impacts.</p> <p>The socioeconomic analysis in Section 4.3 of the Revised Draft EIS considered both temporary and long-term effects from construction, operations, and access restrictions. The analysis recognized potential short-term employment opportunities during construction and range operations, as well as indirect economic activity associated with local services. While the Revised Draft EIS did not project large-scale economic gains, it concluded that socioeconomic impacts would be modest.</p> <p>Regarding local hiring and community benefit, the USMC encourages coordination with CNMI agencies and contractors to maximize use of available local labor and services where feasible, consistent with federal acquisition and contracting regulations. Infrastructure improvements and related construction efforts may also provide secondary benefits to the community through upgraded utilities, roads, and support facilities.</p> <p>Concerns about community infrastructure that are unaffected by the Proposed Action are outside the scope of this EIS and are handled through other governmental agencies and programs.</p>

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	<p>are seeing approximately, a total of \$1 billion dollars in [Department of Defense] contracts for construction projects... We have seen virtually nothing in the way of federal funding to support, help develop the island of Tinian for the people of Tinian. That is causing some friction (Rao, 2025).</p> <p>More effort should be aimed towards providing the people of Tinian with the infrastructure necessary to support the influx of military personnel, DOD civilians, and construction workers. With nearly \$800 million dollars being invested into military expansion in Tinian, funds must be earmarked and made available to ensure that the community receives ample benefit as well.</p>	
73C	<p>Restricted Public Access Effects on Food Security.</p> <p>- Fishing. The activation of surface danger zones in waters north of Tinian during live-fire training could significantly affect fishing and boating due to restrictions of access to waters approximately 2 to 4 miles from the shoreline. Rather than offer mitigation tactics to ensure ample fishing access, the EIS instead mentions that “local mariners often already avoid these nearshore areas due to natural hazards... Many boats typically navigate at safe distances ranging from 500 feet to over a mile offshore, which often coincides with or exceeds the boundaries of the smallest surface danger zone used.” The smallest surface danger zone is about 1.1 miles offshore; this zone is expected to be used 70% of the time during training. The surface danger zone increases to 2.5 miles offshore about 20% of the time and to 3.2 miles approximately 10% of the time. If vessels typically navigate within a 500 ft to 1 mile range to the shore, their access within that range would be restricted 70% of the time. For the other 30% of the time, these vessels would be directed even further out “potentially increasing fuel use, travel time, and exposure to rougher seas” according to the EIS (4-3, 4.1.3.1, Chapter 4). Therefore, the PA would greatly disrupt the everyday access of fishing and boating but offers no recourse or remedy for said issue.</p>	Please see the response to 73B.
73D	<p>Subsistence agriculture and cattle raising. The EIS fails to acknowledge how families in Tinian will support themselves when they cannot access regular food sources. Temporary access restrictions could affect subsistence agriculture, fishing, and hunting and gathering within the Military Lease Area. These restrictions could range from hours to multiple full days, creating issues for the people of Tinian who rely on foraging, fishing, hunting and cattle raising within the Military Lease Area. Noise from military activities are also expected to disturb grazing cattle and game within the lease area. Land and sea restrictions, even if only during training activities, will be extremely disruptive to the daily lives of locals in Tinian, and will likely require more money geared towards</p>	<p>Impacts to subsistence agriculture and cattle raising within the Military Lease Area were analyzed in the Revised Draft EIS, Section 4.1 (Public Access) and Section 4.3 (Socioeconomics, see subheading for Effects on Economic Activities in the Military Lease Area). The analyses concluded the Proposed Action would not result in significant impacts to subsistence users from temporary and intermittent access disruptions. For example, as stated in Section 4.1.3.1 of the Revised Draft EIS, current ranching activities would be minimally affected by training events. Ranchers would continue to have access to their cattle, and training operations would not alter or interfere with actively used agriculture areas. To minimize disruptions, the USMC would ensure that training activities do not interfere with grazing cattle and would</p>

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	<p>importing and purchasing food. This poses risks to long-term food security and sustainability.</p>	<p>provide clear detour information to affected ranchers during active training periods. Access to hunting and foraging areas may be temporarily restricted when training events are active. To minimize disruptions, access controls would be lifted as soon as possible after training concludes, and coordination with the local community would ensure training schedules align as much as possible with important subsistence activities.</p> <p>Potential impacts from noise to wildlife and livestock were also analyzed in Section 4.4.3.1 (Terrestrial Plant Communities), Section 4.4.3.2 (Terrestrial Wildlife) and in Appendix J (Noise Study).</p> <p>Section 4.1 (Public Access) of the Revised Draft EIS outlined measures such as advanced public notice, use of multiple communication channels, and coordination with local agencies and mariners to reduce conflicts with fishing, cultural, and community activities.</p> <p>For training scheduling purposes, the Military Lease Area would be divided into eight smaller, separate training areas allowing safe public access in areas where training activities would not be occurring. During some training events, public access may be limited for the safety of the public and service members participating in the training. However, when possible, public access to recreational beaches, tourism areas, and the North Field National Historic Landmark would continue to be available to the local community and tourists even when training may be occurring. Some training could be conducted without any access controls.</p> <p>The USMC solicited suggestions from the community on the best means of communicating information. Input included multilingual notices, physical posting of schedule and other pertinent information at marinas, and use of social media or radio.</p> <p>As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. Range Control would also work with the Municipality of Tinian to identify in advance any holidays, festivals, or other important days for which public access is needed. Range Control may adjust range operating procedures for communication based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p>
73E	<p>Restricted Public Access and Militarism Effects on Tourism.</p> <p>An increase in funding due to increased military activity or military construction remains an unsustainable source of revenue, especially as these activities threaten land, water, and other resources pertinent to self-sustainability</p>	<p>The Revised Draft EIS evaluated potential effects of the Proposed Action on tourism, access, and local quality of life through cross-referenced discussions in Section 4.3 (Socioeconomics), Section 4.5 (Cultural Resources), and Section 4.8 (Noise). The analysis concluded that training would occur intermittently and would be confined to the Military Lease Area where, under existing lease terms, public access may be</p>

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	<p>and stunt other potential areas of economic growth such as tourism and commercial exports, etc. Long term and sustainable economic growth requires intentional planning aimed at improving local markets, increasing commercial exports, investing in infrastructure upgrades, and securing greater tourism capabilities. However, multiple avenues to improve these markets are stunted by military activities.</p> <p>The increased militarism of Tinian, plus the visibility of servicemen with guns/weapons throughout the Military Lease Area, increased noise levels from live-fire training and jet activity, restricted access to public land and recreational space, and further deforestation may all result in a loss to the tourism industry due to the perceived threat of increasing regional tensions and the ultimate decline in environmental health and cultural vibrancy. The restriction of access to cultural sites and traditional medicine threatens both the CHamoru’s indigenous identity and mars Tinian’s natural and spiritual beauty, threatening that which is necessary for the tourism market. Additionally, according to Tinian’s Mayor Aldan, hotel accommodations remain unavailable to tourists as they have been booked out for two to three years due to military construction, making it difficult to get tourists to stay longer than three to four days since all the rooms are taken (Rao, 2025). This leaves Tinian dependent on short-term military activity to sustain their economy. In comparison, a former administrator of the Guam Economic Development Authority pointed to the military buildup as one of Guam’s tourism industry’s greatest systemic challenges, quoting, “While the relocation of the military from Okinawa to Guam provides short-term economic activity, it does not contribute directly to the recovery of our tourism sector. Instead, it absorbs valuable resources, strains local infrastructure, and perpetuates the perception of Guam as a military outpost rather than the tropical paradise it once was known for... creating an environment Japan, our largest tourist market, does not want” (Martinez, 2024). The PA should accommodate the needs of Tinian in promoting tourism, to ensure long-term economic growth and sustainability.</p>	<p>limited when training events occur under the baseline condition. No new permanent restrictions outside the lease area are proposed, and Range Control procedures would be designed to provide advance notification and to reopen areas as soon as safety allows. The USMC continues to work with CNMI agencies, including the Municipality of Tinian, to balance training requirements with community access and sustainable economic development goals.</p>
73F	<p>Restricted Public Access and the Effects on Cultural Practices.</p> <p>- Traditional medicine. The EIS does not give a comprehensive overview of the types of āmot (plants used in traditional medicine/healing) present in the Military Lease Area, and how the proposed activities may disturb/harm them or disrupt access to them. The revised EIS should provide an itemized list of all of the native and non-native plant species that are important to the practice of traditional healing. The EIS must discuss potential harm or disturbances towards the existence or growth of these critically important medicinal plants.</p>	<p>The analysis of impacts on medicinal plants was discussed in the Socioeconomics (Section 4.3) and Biological Resources (Section 4.4) sections to the extent that that information was known and shared with the USMC. Access to cultural resources, medicinal plants and other resources of cultural significance were analyzed in Public Access (Section 4.1) and referenced in Section 4.5 (Cultural Resources). Additionally, Section 4.15 (Cumulative Impacts), highlighted the Hinemlu Forest Project, which is a project being developed with the Municipality of Tinian under the DoD Readiness and Environmental Protection Integration Program, to rehabilitate a coastal strand and limestone forest trail used for recreation, traditional harvesting, and educational tours.</p>

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	<p>This can be easily done if the USMC coordinates with local traditional healers to identify the presence of ʻāmot plants in the proposed area. Doing so will allow greater public input and participation by the CHamoru people– and will provide more comprehensive information about the potential impacts of the PA on environmental justice, medicinal and cultural resources, and even health impacts. If ʻāmot is found, even if in sparse amounts, comprehensive planning and action must be taken to protect and conserve these plants. Transplanting may not be a realistic method for ʻāmot conservation; therefore, solutions must be realistically considered and discussed with Tinian’s local traditional healers.</p> <p>- Cultural resources. Access to historical and cultural lands will be restricted during training activities, potentially affecting recreation by both locals and tourists. The surface danger zone of one live-fire training range overlaps with cultural resources; however, the EIS does not make it clear how impacts to these areas will be mitigated or avoided. The suggestions given such as “using small-sized ammunition” does not solve the actual problem of disturbance or harm to irreplaceable and invaluable cultural resources. Within the Mariana Islands, the generational and regional trauma of being denied access to culturally significant land and resources has a lasting impact on the psyche of the CHamoru people. Furthermore, concerns regarding the repatriation of potentially found cultural artifacts is not discussed within the EIS. The USMC must ensure that plans are in place for the full disclosure of any historic and cultural artifact found within the area of the Proposed Action to the public and to ensure preservation in place of cultural artifacts and historical sites. There should be no failure on the part of the USMC to preserve in place and prevent further harms to CHamoru cultural heritage. In any other nation, this unnatural disruption of everyday life and tradition would be highly opposed and criticized. Access to cultural resources and traditional medicine should be provided to the public, with little interference. The preservation of cultural lands and resources should be prioritized.</p>	<p>This project will enhance important limestone habitat by removing invasive plants, planting native species, and maintaining fuel breaks in areas prone to wildland fires that destroy forest edges. The trail and habitat enhancement area is adjacent to turtle nesting areas and contains habitat important to many threatened and endangered species.</p> <p>In compliance with NEPA and the National Historic Preservation Act, the Revised Draft EIS analyzed impacts and effects on cultural resources, to include historic properties in Section 4.5. Proposed training locations were sited specifically to avoid cultural resources where possible. Potential effects to historic properties were consulted on with the public, interested parties and members of the community, including those of Chamorro and Carolinian descent, to identify cultural resources, historic properties, potential effects and comment on proposed mitigation (see Appendix H, Cultural Resources Supporting Information). A Programmatic Agreement was developed in consultation and outlines standing operating procedures and best management practices to avoid and minimize adverse to historic properties.</p>
73G	<p>Strain on Infrastructure.</p> <p>The addition of up to 1,000 service members will result in a population increase of almost 50% of Tinian’s existing population of 2,044 people (2020 census). This increase will place a strain on various infrastructure and resources like water, wastewater collection, solid waste management, housing, and wildfire control, etc. The EIS only lightly addresses these areas of concern:</p> <p>- Water Resources. The addition of new water infrastructure to support the Base Camp will not be connected to the Commonwealth Utilities Corporation water system and will consist of up to 4 new or rehabilitated groundwater wells, with</p>	<p>To support the Revised Draft EIS analysis, USMC prepared a groundwater model for Tinian, including current and projected demands for all uses (related to the Proposed Action, other DoD, and community water demands). Model results were included in Appendix M (Utility Studies, Groundwater Modeling Technical Memorandum) which was published along with the Revised Draft EIS and will be included with the Final EIS. The modeling analysis included existing and potential future wells as well as drought scenarios. The USMC would continue to coordinate with CNMI Bureau of Environmental and Coastal Quality on specific details such as permitting and the locations of wells.</p>

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	<p>a demand of up to 7,971,440 gallons of water per year. I am concerned of potential impacts to the groundwater resource in its entirety, the need for construction of monitoring wells to monitor levels of chloride concentration that is indicative of salt water intrusion, if not checked can result in irreparable harm to the drinking water of Tinian. Furthermore, monitoring wells are needed to test all regulated, emerging, and candidate contaminants, as determined by the local people. The local people should be compensated for the use of the water that is pumped from the new or rehabilitated wells. Testing results must be readily available to all residents of Tinian in a timely manner. Groundwater is necessary to sustain life for the local population. The public owns the rights to said water for public use, drinking water, recreation, and other uses. Any infrastructure upgrades must benefit the residents of Tinian. Furthermore, a Stormwater Pollution Prevention Plan must be developed, updated, and/or adopted prior to the National Pollutant Discharge Elimination System Construction General Permit application. Information within the EIS should not be based on an assumption, because clean up and remediation of groundwater and surface water impacted by construction activities, live-fire training, fuel storage, and subsequent runoff, sediment pollution, and toxic contamination can be costly and put the health of the community and environment at risk of harm that could be avoided.</p>	<p>Annual CNMI Bureau of Environmental and Coastal Quality permitting requirements include reporting pumping volumes and water quality on a well-by-well basis. Based on this information, the Bureau of Environmental and Coastal Quality determines annually the allowable pumping volume for the following year.</p> <p>The above information supports the determination that the Proposed Action would not result in significant impacts to groundwater (short- and long-term availability of water and groundwater quality), as described in Sections 4.11, 4.13, and 4.14 (Utilities, Groundwater and Hydrology, and Surface Waters and Wetlands, respectively) of the Revised Draft EIS.</p> <p>At the request of CNMI, the DoD would fund a one-time hydrogeological study to establish baseline data that could be used to support monitoring of Tinian’s aquifer. This study would consist of groundwater sampling at existing well locations, and laboratory testing of water samples. In addition, the DoD would install up to four groundwater monitoring wells at each of the two live-fire ranges, establish a water monitoring plan, and include one year of baseline monitoring before ranges would become operational. The locations of wells would be determined in collaboration with CNMI Bureau of Environmental Quality. These commitments are described in Table 2.3-1 of the Final EIS.</p> <p>DoD usage of water on Tinian operates under principles of federal reserve water rights. USMC would use water appropriately and recognizes the importance of water on Tinian.</p>
73H	<p>- Wastewater. The addition of new septic tanks, leach fields, and sanitary sewer collection pipelines are planned to be installed to meet the demand of 53,000 gallons of wastewater per day. Septic tanks with leaching fields must be prohibited. Only sewer collections should be allowed. This part of the EIS does not provide the scope/size, type, or any details of the proposed septic system or leaching field and does not provide information on how this septic system may be detrimental to the surrounding environment. Septic systems can lead to an increase in groundwater contamination because they do not properly filter contaminants such as nitrates, PFAS, and phosphorus that are derived from wastewater. Septic systems often leach these contaminants, along with any chemical added to the system, directly into the soil. Plus, disposal of toxic septic sludge will be disposed of in an area that has not yet been identified or approved by the CNMI. Septic systems can adversely impact Tinian’s groundwater and impose financial burdens on the local government for future treatment costs to manage contamination and reduced groundwater quality. In Chapter 3, the EIS mentions the Commonwealth Utilities Corporation’s feasibility study for a new wastewater treatment system. I urge the USMC to invest in the implementation</p>	<p>As described in Section 4.11.3.2 (Utilities, Wastewater Treatment), discussions with the Bureau of Environmental and Coastal Quality indicated that the base camp is outside the Class 1 groundwater recharge area. Due to this location and implementation of operational best management practices, the proposed septic system would not significantly impact groundwater.</p> <p>The Revised Draft EIS stated sludge would not be disposed in either existing unlined Puntan Diablo Landfill or the proposed unlined Atgidon Landfill. Sludge from the septic system would be disposed of in compliance with Bureau of Environmental and Coastal Quality regulations at a Bureau of Environmental and Coastal Quality-approved receiving facility.</p> <p>See Section 4.13 (Groundwater and Hydrology) of the Revised Draft EIS for a discussion of potential impacts on the aquifer.</p> <p>A central wastewater treatment system for the island is outside the scope of the Proposed Action.</p>

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	<p>of a central wastewater collection system before conducting the PA, in order to prevent avoidable harm and contamination to Tinian’s groundwater. Assisting Tinian in constructing such a system will ultimately save the USMC from having to spend money and time on septic system maintenance, replacement, and eventual environmental remediation.</p>	
73I	<p>- Solid Waste. DOD policy on minimum solid waste diversion from the landfill and incineration mandates 40% diversion of non-hazardous solid waste. The USMC is only capable of diverting 12% (67 tons) of its estimated 562 annual tons of generated waste. The EIS states that “all potential disposal locations have sufficient capacity to accept the waste generated by Alternative 1” (4-125, Chapter 4). This is inherently false according to USMC’s own information. The facts are: the DOD should aim to meet their minimum solid waste diversion requirement. It cannot do so because the current recycling infrastructure in Tinian does not have the capacity to handle USMC recyclables. The existing landfill also has limited capacity to handle USMC waste, placing the onus on Tinian to improve its infrastructure and to find a location and fund plans for a new landfill (that could take 5 to 8 years to complete). Therefore, rather than having ‘a less than significant impact’ on solid waste utilities, its activities place too much strain on local infrastructure that is exacerbated by the deviation from its own diversion policy. Because of the limited land area, the USMC must exceed the 40% minimum solid waste diversion policy. If they are unable to do so under the current circumstances, then they must invest funding into Tinian’s recycling infrastructure or pay to ship recyclables off the island to reputable recycling centers elsewhere. It is unconscionable for the USMC to lower DoD standards for recycling and to not improve Tinian’s solid waste utility to handle a dramatic increase in solid waste by their increased activity and presence.</p>	<p>Section 4.11.3.3 (Utilities, Solid Waste) of the Revised Draft EIS specifically outlined the options that would be utilized for management of solid waste generated by the proposed project based on the availability or unavailability of local management options: “If the planned permitting of the Puntan Diablo disposal facility and the proposed Atgidon landfill are not completed and landfill disposal capacity is not available, the alternate management methods for solid waste would be considered, including: 1) transport CNMI Joint Military Training solid waste to Marpi Landfill on Saipan; 2) on-site incineration, which would reduce the amount of waste landfilled; or 3) transport the residual waste to one or more off-island facilities authorized to accept DoD waste for final disposal.”</p> <p>Section 4.11 (Utilities) estimated quantities of solid waste to be generated and quantities of recyclables that are projected to be recovered. Impacts to the local landfills, if utilized, have been evaluated. As the project is still in the study and evaluation phase, it is premature to have established contracts for management of solid waste that is not currently being generated. If the Proposed Action is approved, contracts for all necessary support services would be executed. DoD policies mandate the proper recycling and disposal of solid waste in accordance with the rules and regulations of the jurisdiction in which it operates.</p> <p>The current DoD Integrated Solid Waste Management policy sets a minimum diversion from landfilling or non-waste to energy incineration of 40 percent for non-hazardous waste, excluding construction and demolition debris (Office of the Assistant Secretary of Defense 2020). The Proposed Action is unlikely to meet the 40 percent solid waste diversion goal due to the types of waste generated during expeditionary exercises such as pre-packaged food containers and its remote location, which has limited recycling services and no domestic consumption of diverted materials.</p>
73J	<p>Housing. The EIS identifies around 70 off-island workers that will live in Tinian during the extent of the PA’s activities. Additional housing in Tinian will be needed to accommodate these incoming workers. Although this number isn’t significantly large, the mayor of Tinian has noted that ‘since the U.S. DOD began its construction activities on-island, many contractors and subcontractors have been acquiring properties for housing their workers, and for warehouses or stockyards for their construction equipment’ (Erediano, 2024). Tinian is less than 40 square miles and two-thirds of the island is leased to the U.S. military.</p>	<p>Section 4.3 (Socioeconomics) of the Revised Draft EIS stated, “Construction contractors would be expected to utilize local workers to the maximum extent practicable; use of non-immigrant foreign labor is generally not authorized unless efforts to recruit locally and in the U.S. are unsuccessful.” The Final EIS has been updated to reflect the possibility that troop labor may be used for some or all of the construction projects. If troop labor is utilized, potential impacts on housing and other community services would be further reduced.</p>

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	<p>This leaves a limited amount of space capable of use for housing the local population. Meanwhile, the steadily increasing population and military build-up has correlated with an increase in the cost of housing and rent. Mayor Aldan stated that before 2018, a two-bedroom home would cost around \$80,000. Today, a one-bedroom can cost as much as \$180,000. This is more than double the cost in just 7 years due to increasing demand with limited supply, creating housing conditions that are costly for most locals whose minimum wage is \$7.25 (Rao, 2025). In 2024, property owners were charging around \$600-700 in monthly rent for one-bedroom houses (Erediano, 2024). The EIS also discusses the population increase’s foreseeable impacts on public services, such as, medical care, which “may not be able to manage additional demand adequately during periods of simultaneous project construction” (4-152, Chapter 4, EIS). The EIS views this, as well as impacts on law enforcement and firefighting services, as minor– even though these additional demands will affect the accessibility to these services by residents, businesses, and tourists alike.</p>	<p>Section 4.3.3.1 of the Revised Draft EIS also stated, “In the long-term, the hiring of 30 to 50 personnel to manage training events and operate and maintain the facilities and infrastructure in the Military Lease Area (e.g., repair targets and maintain vegetation), could result in a less than significant increase in population, although the USMC intends to hire locally for these permanent positions, wherever possible, based on labor availability and contracting requirements. Hiring would be phased intermittently over the approximate 10 to 15-year period as construction projects are completed and the training infrastructure becomes operational, to include the Base Camp, communications system, live-fire ranges, and Landing Zones. Initially, however, approximately 2-5 positions may be filled on a rotating basis by USMC Base Camp Blaz Range Control staff or other federal civilians.</p> <p>It is anticipated there would be a locally available labor pool of approximately 28 people on Tinian that formerly would have supported the U.S. Agency for Global Media facilities on Tinian. Should local residents be hired, the implementation of CJMT training and the operation of the Base Camp would not be expected to induce additional demand for housing or public services. If off-island labor is hired, it would occur gradually over time as the infrastructure in the Military Lease Area becomes operational.” Thus, as noted in Section 4.3.3.1 of the Revised Draft EIS, potential long-term impacts to Tinian’s housing supply would be less than significant due to the anticipated gradual or phased nature of the hiring.</p>
73K	<p>Hypermilitarization, Climate Change, and Their Lasting Impacts on Ecological and Cultural Resources.</p> <p>The PA poses multiple environmental and social justice issues. The DOD’s failure to address their contributions to climate change will only further exacerbate the threats that Pacific Islands face in the wake of a warming world. Construction, deforestation, disposal of waste, the installation of diesel generators, and the increased use of fuel will all cumulatively contribute to Tinian’s air quality and the impacts to climate change that will ultimately exacerbate Tinian’s infrastructure issues, environment, and health disparities.</p> <p>- Air Quality. The EIS attempts to justify the generation of hundreds of thousands in metric tons of greenhouse gases by stating that they only contribute a small percentage of emissions on a global scale. Ambient air quality standards are applicable to the local area; comprehensive data and impact of potentially hundreds of tons of hazardous air pollutants must be determined for Tinian’s community and environment. Without procuring an accurate assessment of the existing air quality, we cannot assess an accurate representation of how the PA will affect Tinian’s environment.</p>	<p>Section 4.9 (Air Quality) and Appendix K (Air Quality Emissions Calculations) of the Revised Draft EIS discussed impacts from the Proposed Action from air emissions including dust emissions and included details on the required control methods. Although there would be temporary increases in particulate matter and dust, the long-term exposure to communities such as San Jose, which is more than 5 miles south of the Military Lease Area, would be less than significant. This is because of the distance of sensitive receptors from the training area and prevailing wind conditions on Tinian, as discussed in Section 3.9 (Air Quality) of the Revised Draft EIS. According to EPA (August 2014), “The highest concentrations of roadway pollutants occur on or just downwind of a roadway. With greater distance from a roadway, concentrations generally decrease to background levels within 500-600 feet.”</p> <p>As noted in Sections 4.9 (Air Quality) and 4.15.9 (Cumulative Impacts, Air Quality) of the Revised Draft EIS, while there is no statutory or regulatory threshold that defines when greenhouse gas emissions are “significant” for NEPA purposes, the effect from change in greenhouse gas emissions should be evaluated on a global scale as all cumulative emissions contribute to the overall atmospheric greenhouse gas burden.</p>

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	<p>The PA's goal to further advance the USMC's interests within the Mariana Islands comes at a great cost to Tinian. This broad reach of military power poses harm to the local population and ecosystems in Tinian, and to the larger Pacific region, especially in terms of producing greenhouse gas emissions and hazardous waste generation that exacerbate climate change and sea-level rise. Cumulative impacts from large-scale military activities create compounding issues that are likely to leave unreasonably large and lasting health impacts in Tinian.</p>	<p>The Proposed Action would contribute directly to emissions of greenhouse gases from the combustion of fossil fuels during construction and training predominantly from mobile source combustion when training occurs. Compared to the No Action Alternative in future years, the Proposed Action would result in increased greenhouse gas emissions that could affect the CNMI's efforts to achieve its long-term greenhouse gas emission reduction goals. However, as noted in Table 4.9-8 of the Final EIS, the increase in greenhouse gas emissions represents a less than 1% net increase in emissions as compared to U.S. Territory greenhouse gas emission inventories. Accordingly, the Revised Draft EIS concluded that the net increase in greenhouse gas emissions from the Proposed Action would not be significant.</p>
73L	<p>- Water Resources. The EIS fails to address the full impacts from military activities on Tinian's groundwater. Overextraction of island aquifers can lead to salt water intrusion and can irreparably harm the water source that has sustained the community. Furthermore, pertaining to groundwater contamination, the EIS does not point out where Tinian's aquifer is in relation to certain USMC activities, such as the two live-fire training ranges. It can be reasonably inferred that contaminants from live-fire training, uncollected firearm rounds, and explosives will eventually impact Tinian's aquifer, even if these activities are a distance away. Deadly contaminants such as lead and PFAS are typically found in military munitions and explosives. As munitions are detonated, lead and PFAS are released into the surrounding environment and deposited into the soil, groundwater, and surface water; porous limestone is especially subject to absorbing these contaminants from soil and runoff. PFAS is a threat to groundwater and human health; they are long-lasting and bioaccumulate in people's bodies— leading to high rates of cancer, chronic illnesses, birth defects, and death, etc. Lead poses significant health risks to the nervous system, liver, and bones; and can result in brain damage, stunted development in children, pregnancy issues, death, etc. (World Health Organization, 2024). Fuel tanks and pipelines also pose a contamination risk to Tinian's aquifer and groundwater, especially as leaks can go undetected for long periods of time. All of these contaminants are difficult to remediate in the environment and groundwater, leaving Tinian incredibly vulnerable to negative health impacts and potential economic strains (if water has to be imported). Overall, any threat of contamination to Tinian's aquifer poses extreme health risks to the locals and threatens their access to clean drinking water.</p>	<p>With respect to aquifer extraction, as noted in the response to 73G, the USMC prepared a groundwater model for Tinian, including current and projected demands for all uses (related to the Proposed Action, other DoD, and community water demands). Model results were made available in Appendix M (Utility Studies, Groundwater Modeling Technical Memorandum) which was published along with the Revised Draft EIS and will be included with the Final EIS. The modeling analysis included existing and potential future wells as well as drought scenarios. The USMC would continue to coordinate with CNMI Bureau of Environmental and Coastal Quality on specific details such as permitting and the locations of wells.</p> <p>Annual CNMI Bureau of Environmental and Coastal Quality permitting requirements include reporting pumping volumes and water quality on a well-by-well basis. Based on this information, the Bureau of Environmental and Coastal Quality determines annually the allowable pumping volume for the following year.</p> <p>The above information supports the determination that the Proposed Action would not result in significant impacts to groundwater (short- and long-term availability of water and groundwater quality), as described in Sections 4.11, 4.13, and 4.14 (Utilities, Groundwater and Hydrology, and Surface Waters and Wetlands, respectively) of the Revised Draft EIS.</p> <p>With respect to potential contamination, a description of the Range Environmental Vulnerability Assessment program and how the program would serve to monitor the potential for off range migration of munitions constituents at the ranges on Tinian has been added to the Final EIS in Section 4.10.3 (Public Health and Safety). The Range Environmental Vulnerability Assessment program includes conducting an assessment to gain a better understanding of the potential transport of munitions constituents and contaminants from the proposed live-fire range areas. This assessment would include modeling worst case scenario for migration to off range areas including where pathways could reach groundwater.</p>

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		<p>In accordance with the National Defense Authorization Act for Fiscal Year 2020, and Marine Corps Administrative Order 185/24, the Marine Corps no longer uses Fluorinated Aqueous Film Forming Foam (AFFF) and Alcohol Resistant (AR-AFFF) Fire Suppression systems in Marine Corps Facilities. The military is committed to finding safer firefighting alternatives that do not harm the environment or human health.</p> <p>At the request of CNMI, the DoD would fund a one-time hydrogeological study to establish baseline data that could be used to support monitoring of Tinian’s aquifer. This study would consist of groundwater sampling at existing well locations, and laboratory testing of water samples. In addition, the DoD would install up to four groundwater monitoring wells at each of the two live-fire ranges, establish a water monitoring plan, and include one year of baseline monitoring before ranges would become operational. The locations of wells would be determined in collaboration with CNMI Bureau of Environmental Quality. These proposed commitments are described in Table 2.3-1 of the Final EIS.</p>
73M	<p>- Biological Resources. The EIS proposes to violate the Endangered Species Act by not identifying critical habitat for the newly listed Mariana Island endangered and threatened species and by further threatening native ecosystems through proposed deforestation, live-fire training (contamination), training events (noise), and the resultant spread of invasive species and the increased risk of wildfires. The EIS mentions that the USMC “would coordinate with CNMI and federal agencies on pre-planning actions associated with biosecurity” and “as part of the USMC’s Conservation Program, a Wildland Fire Management Plan would be developed.” These plans should have been developed for the purpose of the EIS, to provide the community with information on USMC’s potential mitigation tactics. It is premature to assume that these plans will be effective, and it is unfair that the community is expected to accept the results of this EIS with important plans like these not included. Nesting bird surveys have also not yet been provided.</p> <p>The EIS fails to provide enough information regarding the 19 acres (2%) of Tinian’s Natural Resources Conservation Area, meant for conservation of the endemic and endangered Tinian Monarch, that is planned to be cleared for construction of landing zones and access roads. It is extremely concerning that specific mitigation measures are not already planned for or mentioned. Conservation areas are extremely important as they are vulnerable. They already face multiple stressors: invasive species, natural disasters, an increasingly hotter climate, etc. Conservation areas cannot be replaced; the successful translocation and transplanting of native flora and fauna is unlikely unless new sites mimic</p>	<p>The USMC conducted a comprehensive analysis of potential environmental impacts of proposed construction and training on Tinian in the Revised Draft EIS. The USMC has concluded that proposed construction and training will not significantly impact CNMI’s natural resources, as described in Section 4.4 of the Revised Draft EIS.</p> <p>With respect to potential impacts on the fanihi and nesting green sea turtles, the USMC is consulting with the U.S. Fish and Wildlife Service under the Endangered Species Act. The consultation will be complete and incorporated, as appropriate, into the Record of Decision. It should be noted that the Tinian Monarch is not a part of the consultation because it was delisted in 2004.</p> <p>Figure 4.4-4 in the Revised Draft EIS displayed the existing and proposed restricted area to ensure protection of natural resources. Section 4.4.3.3 (Terrestrial Special Status Species) of the Revised Draft EIS discussed potential impacts on listed species, including the fanihi and green sea turtle. For the fanihi, ground training would not occur in the limestone native forest along the cliff line of Mount Lasso where the known fruit bat colony occurs, and training activities would generally occur in areas far removed from this location. As noted in Section 4.4.3.3, during the planning process for the Proposed Action, the USMC re-sited the location of the Explosives Training Range from an area further north on Tinian and closer to the bat colony, to the current proposed location which would decrease noise impacts on the species. For nesting green sea turtles, as noted in Section 4.4.3.3 and consistent established protocols, the USMC would minimize potential impacts on the species by conducting pre-training surveys, avoiding nests and curtailing night-time training if a nest is discovered, and minimizing light exposure. Section 5.1.2 of the Revised Draft EIS</p>

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	<p>exact conditions of original habitats. It is highly suggested that USMC move the construction of landing zones to another location, particularly, a non-conservation &amp; previously disturbed area.</p> <p>I am also concerned about the posed risks to the native fanihi (Mariana fruit bat) and green turtles. The PA will result in the loss of potential roosting and foraging locations for the fanihi through deforestation and increased noise; however, no specific plans for mitigation or forest restoration are provided by this EIS. The fanihi are a highly threatened species in the Marianas, with no indication of great recovery in the past decades. They have a slow birth rate of one pup per year and a lifespan in the wild of only 5 to 8 years (Brooke, Guampedia). The PA also poses direct harm to green turtle eggs and nesting activities during training, increasing concerns over the protection of sensitive marine species. Overall, the cumulative impacts of the PA will continue to disturb the environment/ecosystems and native species, with even considerably small impacts having effects on such sensitive species. Plus, the survival of the fanihi is necessary for the germination and dispersal of native fruit, plants, and trees; therefore, the survival of Tinian’s ecosystems are predicated on the conservation of this species. In consideration of the sensitive nature of these ecosystems, there is no such thing as a negligible impact. Therefore, increased military activity, live-fire training ranges/projectiles, noise, explosives, contamination, and others are disruptive and unfavorable to creating an environment in which these listed species can recover and thrive in the future.</p>	<p>detailed the 1999 Conservation Agreement and allowable uses in the Natural Resource Conservation Area.</p> <p>In addition, Appendix D, Best Management Practices stated, “... the [Joint Region Marianas] Integrated Natural Resources Management Plan would be updated with additional management tools developed in coordination with cooperating agencies to protect native vegetation on Tinian.” This proposed management measure is also listed in Table 2.3-1. Section 4.4.3.1 of the Final EIS has been updated to discuss potential mitigation for vegetation clearing includes proposed forest enhancement in the Pina Plateau region of Tinian. Mitigation plans will be finalized after completion of Endangered Species Act consultations and outlined in the EIS Record of Decision.</p> <p>The Final EIS was updated to expand the discussion and analysis of wildfire conditions, risks, and management in Chapters 3 and 4. The Final EIS evaluates wildfire as a potential stressor to biological resources, including training related ignition sources, local response limitations, and the vegetation communities most susceptible to fire. The analysis acknowledges that wildfire could occur but concludes that fires on Tinian are expected to be primarily confined to grassland and disturbed grassland communities, while limestone native forest, secondary limestone forest, and freshwater wetlands that support federally listed and sensitive species are unlikely to sustain wildfire due to limited fine fuels, higher fuel moisture, and closed canopy conditions.</p> <p>The Final EIS also evaluates wildfire risk in the context of incorporated prevention and risk management measures, including training restrictions during elevated fire danger conditions, fuel management and fire breaks, ignition prevention procedures, and rapid response actions, and concluded that wildfire related effects on biological resources would be localized, temporary, and less than significant. The Wildland Fire Management Plan was identified as an implementation level plan that would be finalized prior to initiation of live-fire training and would include site-specific procedures consistent with the wildfire risk management framework evaluated in the Final EIS.</p>
73N	<p>With no scientific basis provided, it is inappropriate, if not absurd, that the EIS mentioned that native vegetation could act as a natural buffer to projectiles (from the Multi-Purpose Maneuver Range) entering coastal waters. Although it is assumed that projectiles are unlikely to enter the sea, it is not a better alternative for projectiles to hit vegetation. There remains concern over how contaminants from projectiles and potential unexploded ordnance could impact the environment surrounding these live-fire training ranges.</p>	<p>Range Control would be responsible for range clearance and post-training inspections after training has concluded, including the removal of military munitions (e.g., destruction, removal, and proper disposition of military munitions and other range-related debris, target debris, military munitions packaging, and crating material).</p> <p>A description of the USMC’s Range Environmental Vulnerability Assessment program and how the program would serve to monitor the potential for off range migration of munitions constituents at the ranges on Tinian has been added to the Final EIS in Section 4.10.3 (Public Health and Safety). The Range Environmental Vulnerability</p>

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		<p>Assessment program includes conducting an assessment to gain a better understanding of the potential transport of munitions constituents from the proposed live-fire range areas. This assessment would include modeling worst case scenario for munitions constituents migration to off range areas including where pathways could reach groundwater.</p> <p>Potential impacts from munitions constituents were evaluated in Section 4.10 (Public Health and Safety) of the Revised Draft EIS. Based on the anticipated activities at the proposed live-fire ranges, the potential munitions constituents that may impact soil and water include energetic compounds (such as explosives), perchlorate, lead, copper, zinc, and potentially antimony. These constituents were selected for evaluation due to their expected presence in the types and quantities of munitions to be used. Other constituents, including per- and polyfluoroalkyl substances are not recommended for inclusion in the assessment, as they are not anticipated to be present.</p> <p>At the request of CNMI, the DoD would fund a one-time hydrogeological study to establish baseline data that could be used to support monitoring of Tinian’s aquifer. This study would consist of groundwater sampling at existing well locations, and laboratory testing of water samples. In addition, the DoD would install up to four groundwater monitoring wells at each of the two live-fire ranges, establish a water monitoring plan, and include one year of baseline monitoring before ranges would become operational. The locations of wells would be determined in collaboration with CNMI Bureau of Environmental Quality (please see Table 2.3-1 of the Final EIS).</p>
730	<p>Hazardous Waste Management. The EIS mentions operational-related hazardous wastes (e.g. fluorescent lamps, mercury-containing instruments, batteries), but does not provide an estimated quantity of hazardous waste expected to be generated. All hazardous waste related to operations and construction are planned to be transported off-island or stored in accordance with RCRA regulations. However, the EIS fails to mention other types of hazardous waste expected to be generated by military-related activities including live-fire training (e.g. projectiles) and explosives testing and how these types of wastes will be handled and disposed of. It also fails to identify the area in which a Hazardous Materials Storage building will be constructed/located. The people of Tinian have the right to know the types of all hazardous materials expected to be imported and generated, the sources of said hazardous materials, the estimated amounts meant to be stored or disposed of, and where such materials will be stored on their island. A more comprehensive overview of hazardous waste management must be provided. And, emergency plans must be designed and implemented, with public participation, to address potential hazardous</p>	<p>The Revised Draft EIS acknowledged in Section 3.11.3 (Utilities, Solid Waste and Hazardous Waste), that due to the lack of a hazardous waste disposal facility on Tinian, the military currently removes all solid and hazardous waste generated during training exercises for off-island disposal in accordance with applicable laws and regulations. As described in Section 4.10 and 4.11 (Public Health and Safety and Utilities, respectively) of the Revised Draft EIS, all hazardous materials associated with construction or training under the Proposed Action would continue to be stored, handled, and disposed of in accordance with all applicable laws, regulations and permits.</p> <p>As discussed in Section 3.10.4 (Public Health and Safety - Unexploded Ordnance and Discarded Military Munitions) of the Revised Draft EIS, the U.S. military has ongoing responsibilities to manage and address legacy UXO in accordance with DoD programs and applicable safety standards. If encountered during the construction or subsequent use of the Military Lease Area, any UXO, munitions, or munitions debris that pre-date the Proposed Action (i.e., from World War II or that are unrelated to current or</p>

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	<p>spills, leaks, and accidents– in order to ensure that proper mitigation tactics and remediation plans are properly in place before implementation of the PA.</p>	<p>planned military training) would be managed per the Comprehensive Environmental Response, Compensation, and Liability Act response processes and procedures.</p> <p>Under the Proposed Action, the construction contract would specify that a qualified explosive ordnance disposal technician must be available during earthmoving activities to investigate and determine the appropriate method for disposal (e.g., destroyed in place if unsafe to move or identifying the offsite disposal or location and handling procedures). There is currently no approved site for the disposal of UXO on Tinian, and permitting the Explosives Training Range as an approved site for the disposal of UXO is beyond the scope of the Proposed Action.</p> <p>Range Control would be responsible for range clearance and post-training inspections after training has concluded, including the removal of military munitions (e.g., destruction, removal, and proper disposition of military munitions and other range-related debris, target debris, military munitions packaging, and crating material).</p>
73P	<p>The PA’s goal to further advance the USMC’s interests within the Mariana Islands comes at a great cost to Tinian. This broad reach of military power poses harm to the local population and ecosystems in Tinian, and to the larger Pacific region, especially in terms of producing greenhouse gas emissions and hazardous waste generation that exacerbate climate change and sea-level rise. Cumulative impacts from large-scale military activities create compounding issues that are likely to leave unreasonably large and lasting health impacts in Tinian.</p> <p>It is unclear how the determination of ‘No Impact’ or ‘Less Than Significant Impact’ was made in addition to an inadequate assessment of cumulative impacts on the community and environment in Tinian and the broader Marianas. Hundreds of millions of dollars are projected to be spent for this Proposed Action, with little justification for training in Tinian in the first place. Tinian in itself does not have environmental conditions or terrain that offer new experiences or learning opportunities for military training.</p> <p>It is an environmental justice issue due to scale, intensity, and frequency of unchecked militarization and the subsequent large and cumulative environmental impacts in Tinian and the Mariana Islands because of the political power imbalance between the CNMI and the US, unlike that which exists with sovereign nations. Meanwhile, these activities may increase geopolitical tensions within the region by projecting force near U.S. ‘adversaries,’ leaving the Mariana Islands vulnerable and targeted.</p> <p>All negative impacts mentioned in the PA cause and increase trauma and negative health outcomes for both the local population and native ecosystems</p>	<p>The USMC conducted a comprehensive analysis of potential environmental impacts of proposed construction and training on Tinian in the Revised Draft EIS using best available science.</p> <p>Consistent with requirements under NEPA, including case law, federal agencies are responsible for evaluating the reasonably foreseeable environmental effects of the agency’s Proposed Action. Environmental conditions resulting from relevant past actions were included as part of baseline conditions in Section 3 of the Revised Draft EIS. Section 4.15 (Cumulative Impacts) of the Revised Draft EIS discussed potential cumulative environmental impacts of ongoing and future projects on Tinian and the CNMI. The Revised Draft EIS cumulative impacts analysis utilized the most current regional data available at the time of publication and includes potential socioeconomic, environmental, and resource-related effects.</p> <p>Please see Section 1.1 of the Revised Draft EIS for a discussion of why Tinian is an important training location for DoD and why the USMC is proposing additional training on the island.</p> <p>Please see the responses to 73A and 73B as they address similar issues raised in this comment.</p>

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	<p>over time, and typically manifest in the form of higher healthcare costs, lower life expectancy, hearing problems, land degradation, a decline in food security, loss in indigenous flora and fauna, and irreparable harm to drinking water, amongst a multitude of impacts. What types of compensation can be provided to the people of Tinian if mitigation measures or restoration methods fall short of the promise to protect and conserve the island’s critically important land, species, or environmental and cultural resources? Overall, there seems to be no sound scientific basis that supports the determination of ‘no impact’ or ‘less than significant impact.’</p> <p>Throughout the entirety of the EIS, impacts on different aspects of Tinian are described, yet the EIS contradicts itself when actions are then deemed not impactful. These conclusions remain questionable, because of the inherent conflict of interest between the desires of USMC for military expansion on one of smallest land masses with a high biodiversity richness and the presence of endemic endangered and threatened species. In addition to sound scientific basis, genuine consultation must be implemented with the indigenous people and residents of Tinian population, who have a direct stake in cultural resources, access to public space, subsistence cattle ranching, fishing, tourism, and other resources.</p> <p>The EIS fails to provide a thoroughly comprehensive and detailed overview of the environmental and cumulative impacts caused by climate change and the multitude of military projects throughout the Mariana Islands, including tangible research and data about Tinian’s cultural resources (e.g. traditional medicine, artifacts), economy/tourism, environmental quality, ambient air quality, and future infrastructure plans. Overall, this large-scale proposed action is incongruent to Tinian’s land mass, local needs, and biodiversity and resource conservation, and therefore undermines the pursuit for environmental justice in Tinian and the entire Mariana Islands. To conclude, I write in opposition to the PA and urgently request the Department of Defense (DOD) and U.S. Marine Corps (USMC) to consider the “No Action Alternative.”</p>	

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74A	<p>2.1.5.2 Explosives Training Range, Page 2-16</p> <p>This section of the EIS mentions the minimization of potential noise impacts to the Mariana fruit bat and the potential impacts to culturally sensitive areas. DEIS fails to assess the realistic impacts of what explosive training would mean to the island's wildlife and environment. I am writing this comment as somebody who works in the environmental sector in the Mariānas. I have worked under the Division of Fish &amp; Wildlife where I learned that the Mariana fruit bats are highly endangered and highly sensitive to their environments.</p> <p>The persistent explosive trainings would not only disturb the peace and stability of the Mariana fruit bats but other wildlife as well. In such small islands like in the Mariānas, ensuring the survival of these endemic species is crucial to maintain the biodiversity of our islands.</p>	<p>The USMC agrees that the Proposed Action has potential to adversely affect the Mariana fruit bat. As such, the USMC is consulting with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act. The consultation will be complete and incorporated, as appropriate, into the Record of Decision.</p> <p>As noted in Section 2.1.5.2 (Explosives Training Range) in the Revised Draft EIS, the proposed Explosives Training Range site is located south of the North Field National Historic Landmark, placing the Explosives Training Range away from the village of San Jose and in an area that minimizes potential impacts from training events on residents and natural resources. This includes minimizing potential noise disturbances to sensitive species such as the Mariana fruit bat.</p> <p>Section 4.4.3.2 (Terrestrial Wildlife) of the Revised Draft EIS evaluates potential noise effects on wildlife. Additional information on the basics of sound and the potential effects of noise can be found in “Discussion of Noise and Its Effects on the Environment,” which is provided as Attachment 1 to Appendix J, <i>Noise Study</i>. Specific topics include land use compatibility, noise-induced vibration effects, noise-induced hearing impairment and non-auditory health effects, noise effects on children, domestic animals, and wildlife. Chapter 4.8 (Noise) of the Revised Draft EIS evaluates potential noise effects on the citizens of Tinian.</p>
74B	<p>Lastly, these explosive trainings would most definitely affect marine life. Our community is dependent on the ocean, and it is a part of our lifestyle. Having Tinian be a live-fire range would not only impact Tinian but Saipan as well. These concerns are not specified in the EIS and is not considered enough for what these “developments” would mean for our community.</p>	<p>The Revised Draft EIS evaluated potential impacts to fisheries, and biological resources from the Proposed Action. As noted in Section 4.4 (Biological Resources), the Revised Draft EIS acknowledged that live-fire training would introduce temporary surface danger zones in northern Tinian waters. These closures would be intermittent and limited to training events, with Range Control responsible for coordinating closures and providing advance notice to mariners and the public.</p> <p>The USMC is consulting with the National Marine Fisheries Service under the Magnuson–Stevens Fishery Conservation and Management Act and the Endangered Species Act regarding potential impacts to marine life and essential fish habitat. The consultation will be complete and incorporated, as appropriate, into the Record of Decision.</p>

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74C	<p>All in all, I believe that this EIS does not sufficiently cover and assess the true damages this would inflict on the Mariãnas. The community demands more transparency, clarity, and accountability to genuinely minimizing harm to the people and the ecosystems of the Mariãnas. We urge the Department of Defense to consider the voices of the people who live here who have long expressed concerns about the scale, scope, and cumulative impacts of ongoing military build up in our islands. We encourage public engagement and transparent information sharing in this and related proposals and activities. We also recommend that the Department of Defense consider selecting the "no-action" alternative for this proposal as a responsible path forward, consistent with the stewardship values the military and our islands strive to uphold.</p>	<p>In developing this Proposed Action, the USMC evaluated the changes in the way U.S. Armed Forces currently prepares for future conflicts and carefully considered the comments and suggestions submitted on the 2015 Draft EIS/OEIS by elected officials and government agencies of the CNMI, federal agencies, the public, and collaborative interagency coordination. The USMC's proposed training concept for the Military Lease Area on Tinian recognizes the importance of minimizing the impacts of military training on the residents of Tinian. First, the training concept was purposefully designed to locate live-fire ranges within the northern portion of the island, away from the village of San Jose, recreational beaches, tourism areas, and cultural and natural resources. Second, understanding that public access to the Military Lease Area was important to the community, the USMC identified the establishment of an on-island Range Control to foster communication between the community and military to allow access to the Military Lease Area when it could be safely accommodated, even during ongoing training events.</p> <p>After developing this training concept, the USMC engaged the CNMI government in a series of virtual and in-person discussions on a revised training concept and revised environmental analysis between January 2020 and September 2024. In August 2023, the USMC held public information sharing sessions on the islands of Tinian, Saipan, and Rota to inform the public at large of the revised training concept.</p> <p>To encourage the sharing of information and discussion with the public, the USMC held the public meetings in June 2025 for the Revised Draft EIS in an open house format. Each poster station presented the analysis of a key resource and a representative was available to answer questions. Chamorro and Carolinian version translations of the fact sheet were available at the public meetings and on the project website. The Executive Summary in these languages was also made available to download from the project website and printed copies were available for review at the local libraries on Tinian, Saipan, and Rota. Additionally, the USMC held office hours in August 2025 at the Commonwealth Bureau of Military Affairs Tinian Field Office to provide an opportunity for additional public engagement prior to the end of the public comment period.</p>

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75A	<p>This EIS fails to address the mess left from previous wars and exercises and fails to provide detailed plans for the clean up of unexploded ordinances and pollutants by previous military activities in the CNMI.  <a href="https://www.rnz.co.nz/international/pacific-news/570403/unexploded-wwii-ordnance-unearthed-at-american-memorial-park-in-saipan">https://www.rnz.co.nz/international/pacific-news/570403/unexploded-wwii-ordnance-unearthed-at-american-memorial-park-in-saipan</a></p>	<p>As discussed in Section 3.10.4 (Unexploded Ordnance and Discarded Military Munitions) of the Revised Draft EIS, the U.S. military has ongoing responsibilities to manage and address legacy UXO in accordance with DoD programs and applicable safety standards. If encountered during the construction or subsequent use of the Military Lease Area, any UXO, munitions, or munitions debris that pre-date the Proposed Action (i.e., from World War II or that are unrelated to current or planned military training) would be managed per the Comprehensive Environmental Response, Compensation, and Liability Act response processes and procedures.</p> <p>Under the Proposed Action, the construction contract would specify that a qualified explosive ordnance disposal technician must be available during earthmoving activities to investigate and determine the appropriate method for disposal (e.g., destroyed in place if unsafe to move or identifying the offsite disposal or location and handling procedures). There is currently no approved site for the disposal of UXO on Tinian, and permitting the Explosives Training Range as an approved site for the disposal of UXO is beyond the scope of the Proposed Action.</p> <p>Range Control would be responsible for range clearance and post-training inspections after training has concluded, including the removal of military munitions (e.g., destruction, removal, and proper disposition of military munitions and other range-related debris, target debris, military munitions packaging, and crating material).</p> <p>The new proposed ranges would be managed in accordance with the USMC’s Range Environmental Vulnerability Assessment program. The purpose of the Range Environmental Vulnerability Assessment program is to identify whether there is a release or substantial threat of release of munitions constituents from operational ranges to off-range areas. A description of the Range Environmental Vulnerability Assessment program and how the program would serve to monitor the potential for off range migration of munitions constituents at the ranges on Tinian has been added to the Final EIS in Section 4.10.3 (Public Health and Safety).</p>
75B	<p>Further, this EIS fails to address cumulative impacts of multiple efforts to increase military activity in the Mariana Islands archipelago. By attempting to obscure the cumulative impact you are ignoring the scientific fact that the Mariana Islands archipelago is a biological, economical, and social region and, thusly, what happens on one island in the archipelago affects another. This EIS must include cumulative impacts of all current and planned EIS processes in the region and include existing residual impacts from previous military activities in the region.</p>	<p>Chapter 4, Section 4.15 of the Revised Draft EIS includes a cumulative impact analysis for each resource. Cumulative impact analysis considers present and reasonably foreseeable actions on the Island of Tinian. Residual impacts from previous military activities in the region were reflected in baseline environmental conditions described in Chapter 3 (Existing Environment) of the Revised Draft EIS.</p>

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76A	<p>Dump site:</p> <p>The proposal suggests that the military will fund a new dump site for trash created by training. This site is much further north than the existing dump. Representatives at the meeting on Tinian suggested that this new EPA compliant facility could be used for municipal trash as well. Many people on Tinian do not have vehicles good enough to travel that poor road. Without trash pickup or a transfer station, a further away dump will likely lead to more illegal dumping, pollution, and environmental degradation. I suggest that the recycling facility and transfer station be made fully operational and staffed through this project. This would allow for the small island to manage it's waste alongside the much larger military impact.</p>	<p>The CNMI's effort to permit the existing dump site at Puntan Diablo as a Small Community Exempt Landfill and the location and design of the potential future landfill site on Tinian is independent of the Proposed Action. The design, operation, and funding of a future landfill are within the authority and responsibility of the local CNMI government. The proposed Atgidon location was identified by the CNMI in a process independent of the proposed project. The location, design, and trash pickup processes are the responsibility of the CNMI government.</p>
76B	<p>Northpoint firing range:</p> <p>The current proposal suggests that live-fire training will occur occasionally and when it is scheduled boaters will be notified via a QR code or email notifications. Many people in the CNMI do not use smart phones or email. Travel from Tinian to Saipan is not necessarily planned ahead of time and instead is taken as needed.</p> <p>The vast majority of all goods on Tinian come from Saipan directly through the exclusion zone from the firing range. Closing that area for any amount of time will be incredibly difficult to communicate or enforce and will have a massive impact on the economy and connectivity of the islands.</p>	<p>Two surface radar towers would be located on the north and northwest coastline of Tinian. When live-fire training is conducted and one of the surface danger zones has been activated, there would be a lit red light on the towers, and a red flag would be flown. This practice is consistent with Marine Corps Order 3550.10 (Policies and Procedures for Range and Training Area Management) and other USMC range standard operating procedures. An additional safety feature is the surface radar housed in the towers would be used to survey the ocean surface to detect and provide an early warning to Range Control should a boat, or a member of the public or other non-participant, approach the activated surface danger zone from offshore. Should an unplanned encroachment be detected by Range Control (surface vessel or aircraft in the overlying airspace), all training would cease until the non-participant is out of the area. If the range is active prior to surface radar towers being constructed or if surface radar is down for maintenance, trained field spotters would be used. Spotters would be positioned at coastal observation points with unobstructed views of the surface danger zones and would maintain continuous visual surveillance of the ocean surface. Spotters would communicate directly with Range Control to provide early warning of any surface vessels or other non-participants approaching or entering an active danger zone.</p> <p>As described in Section 2.1.6 (Live-Fire Range Safety Areas) and 4.1 (Public Access) of the Revised Draft EIS, surface danger zones would be temporarily activated during scheduled live-fire events. These areas would not be permanently closed. Notification of surface danger zone activations would be made through the U.S. Coast Guard's Notice to Mariners system, along with other public communication channels. The USMC would continue to work with the CNMI government and Municipality of Tinian to determine the appropriate methods to ensure mariners, including subsistence and night fishermen, receive timely and effective information. The USMC solicited suggestions from the community on the best means of communicating with the fishing</p>

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		<p>and boating community. Input included multilingual notices, physical posting of schedule and other pertinent information at marinas, and use of social media or radio.</p> <p>Text has been added to Section 4.3.3.1 of the Final EIS stating, “The activation of surface danger zones would also affect commercial shipping vessels transiting in the waters north of Tinian. In comparison to daily fishing and boating, commercial vessels would be present less frequently, and include smaller commercial shippers and approximately four barge trips per month. In order to minimize impacts to shipping schedules, Range Control would coordinate with the Commonwealth Ports Authority to ensure scheduling of training events is understood and communication about shipping schedules is known and any temporary access restrictions would be discussed. The USMC would utilize adaptive management to ensure range safety and scheduling requirements are met, and would make adjustments as needed. Therefore, there would be a less than significant impact to commercial shipping as a result of training under Alternative 1.”</p> <p>As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. Range Control may adjust range operating procedures for communication based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p>
76C	<p>Environmental Impacts:</p> <p>The natural resources of Tinian have already been immensely impacted by military action from Japan and the US. In the 80 years since WW2 there has been a large amount of natural regeneration of forests across the island. Every native tree provides habitat for wildlife, ecosystem services, erosion control, and food and medicine for people. This document recognizes the value of current “native limestone forest” but ignores the fact that the whole island used to be this same valuable habitat and likely will be again in the following decades without further human caused destruction. When selecting for development sites like the LZs, care should be taken to disturb the least forest possible. This includes “tangantangan” forests which always contain diverse native tree seedlings and are often on their way to becoming more productive forest ecosystems. These low forests are also important habitat for the Tinian Monarch. Development should only occur in open areas or grasslands where there are no native trees present. If any trees are removed they should be replaced via mitigation measures, including “tangantangan forest” areas.</p>	<p>During the planning phase of the Revised Draft EIS, the USMC specifically sited project elements outside of limestone native forest, coastal limestone scrub, and wetland vegetation, the three most ecologically important terrestrial habitats on Tinian. Although secondary limestone forest often does contain a mix of non-natives, such as tangan-tangan, and native species, what is mapped in the Revised Draft EIS as Leucaena forest is often a near-complete monoculture of non-native tangan-tangan trees that do not allow for the redevelopment of limestone native forest. All Landing Zones would be surveyed and sited within the locations shown in the Revised Draft EIS to avoid sensitive ecological and cultural resources. Section 4.4.3.1 of the Final EIS has been updated to discuss potential mitigation for vegetation clearing includes proposed forest enhancement in the Pina Plateau region of Tinian. Mitigation plans will be finalized after completion of Endangered Species Act consultations and outlined in the EIS Record of Decision.</p>

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77A	<p>Deficient assessment of impacts, lack of public information available for community responses, and failure to ensure Free, Prior, and Informed Consent within the comment period are just some of the concerns we mention in this comment submission. The appendices for the Draft EIS were not made available upon the opening of the comment period. Additionally, the organization and identifying title of each chapter were missing making this document difficult to navigate. Also lacking is a thorough analysis of alternatives including other locations for the action and alternatives for infrastructure construction materials. The EIS does not offer substantial analysis of how the determinations were made. The lack of public access to the areas of impact also prevents a true understanding of the changes and risks to the landscape, both physical and cultural. We are particularly concerned about the potential contamination of the sole-source aquifer in Tinian. We do not have to look far to see how human activities have permanently destroyed fresh water resources such as in Saipan and several abandoned wells in Guam. There is also the issue of unresolved existing munitions left in Tinian.</p> <p>The timing of the process is also problematic given that the comment period began before all information was made available to the public. This comment period also ran simultaneously with another comment period open for the Marianas Islands Testing and Training activities on No'os.</p> <p>Several citizens of the CNMI also reside in Guam and no public outreach took place in Guam, severely underserving the collective community of the Marianas. This lack of thorough community engagement is also a breach of our right to free, prior, and informed consent, which is a violation of our human and Indigenous rights.</p> <p>(<a href="https://www.ohchr.org/sites/default/files/Documents/Issues/IPeoples/FreePriorandInformedConsent.pdf">https://www.ohchr.org/sites/default/files/Documents/Issues/IPeoples/FreePriorandInformedConsent.pdf</a>  <a href="https://www.un.org/development/desa/Indigenouspeoples/publications/2016/10/free-prior-andinformed-consent-an-Indigenous-peoples-right-and-a-good-practice-for-local-communities-fao/">https://www.un.org/development/desa/Indigenouspeoples/publications/2016/10/free-prior-andinformed-consent-an-Indigenous-peoples-right-and-a-good-practice-for-local-communities-fao/</a>).</p>	<p>The Revised Draft EIS was prepared in compliance with NEPA and all other applicable statutes and regulations. The full table of contents and appendices were available on the project website: <a href="https://www.CNMIJointMilitaryTrainingEIS.com">https://www.CNMIJointMilitaryTrainingEIS.com</a>. The website has been updated with descriptive titles for downloadable EIS sections.</p> <p>The Revised Draft EIS was made available to the public as required by NEPA. During the public comment period, the USMC periodically checked to ensure the documents continued to be downloadable. Some individuals had difficulty downloading files from the project website, possibly because of the large file sizes. When this was brought to our attention, we immediately added reduced file sizes to the website to assist in downloading.</p> <p>For the Revised Draft EIS public comment period, the USMC provided a 15-day extension for a total of 90 days. The USMC understands there are multiple government actions being conducted in the CNMI and the DoD has staggered the release of EISs to provide opportunities for public review and comment.</p> <p>The Notice of Availability/Notice of Public Meetings for the Revised Draft EIS was published in the Federal Register, local newspapers (including the Pacific Daily News), and on the project website on June 6, 2025. Any member of the public could submit comments during the Revised Draft EIS public comment period, including citizens from Guam. The USMC conducted Revised Draft EIS public meetings in an open house format to encourage the sharing of information and discussion. Open house meetings provided increased flexibility for attendees, allowed one-on-one interaction with experts and provided a casual atmosphere that encouraged more direct and comfortable participation and feedback. Each poster station presented the analysis of a key resource, and a representative was available to answer questions. Public comments could be submitted in writing, by mail, on the website or through a court reporter at public meetings. Comments could be submitted in any language, and Chamorro and Carolinian translators were available at the public meetings. Chamorro and Carolinian version translations of the fact sheet were available at the public meetings and on the project website. The Executive Summary in these languages was also made available to download from the project website and printed copies were available for review at the local libraries on Tinian, Saipan, and Rota. Additionally, the USMC held office hours in August 2025 at the Commonwealth Bureau of Military Affairs Tinian Field Office to provide an opportunity for additional public engagement prior to the end of the public comment period.</p> <p>With respect to alternatives, the Revised Draft EIS discusses why other locations were not considered (see Section 2.4, Alternatives Considered but not Carried Forward for Analysis) and it also includes a discussion of the siting of facilities (see Section 2.1.5, Training Infrastructure). )The USMC used best available science in its analysis, which</p>

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		<p>included a qualitative and quantitative approach. Each resource section in Chapter 4 (Environmental Consequences) of the Revised Draft EIS, included a subsection called “Approach to Analysis.” This subsection discussed how the analysis of potential impacts was considered. The public comment period allowed for input on the methodology, analysis, and conclusion of potential impacts. Significance determinations are within the discretion of the federal agency.</p> <p>With respect to potential impacts on the aquifer, new proposed ranges would be managed in accordance with the USMC’s Range Environmental Vulnerability Assessment (REVA) program. The REVA program includes conducting an assessment to gain a better understanding of the potential transport of munitions constituents from the use of the proposed live-fire range areas. This assessment would include modeling scenarios for munitions constituents migration to off range areas including where pathways could reach groundwater. A description of the REVA program and how the program would serve to monitor the potential for off range migration of munitions constituents at the ranges on Tinian has been added to the Final EIS in Section 4.10.3 (Public Health and Safety). The Revised Draft EIS included a proposed management measure to construct up to four monitoring wells at each of the two proposed live-fire ranges (see Table 2.3-1). The DoD would continue to work with CNMI Bureau of Environmental and Coastal Quality on specific details such as the locations of wells and an appropriate sampling frequency. At the request of CNMI, the DoD would fund a one-time hydrogeological study to establish baseline data that could be used to support monitoring of Tinian’s aquifer. Table 2.3-1 (Proposed Management Measures) in the Final EIS has been updated to reflect this proposed future hydrogeological study, and text has been updated to provide clarity on proposed groundwater monitoring wells at the live-fire ranges.</p>
77B	<p>Gendered violence issues are also not included and are relevant to the increased burden on healthcare. Military sexual violence is an increasing problem, and 5 cases have been revealed in Okinawa in the last year. Gendered and sexual violence must be included in the EIS. It is also a known fact throughout the Asia Pacific region, that with amplified U.S. military exercises, also comes a rise in crime and sexual or gendered violence. The American Psychological Association has reported an estimated 25% increase of military sexual assaults since 2018. (<a href="https://www.apa.org/monitor/2024/03/military-sexual-assault-prevention-efforts#:~:text=within%20its%20ranks.-,The%20move%20comes%20after%20an%20estimated%2025%25%20increase%20in%20military,of%20People%20Analytics%2C%202023).">https://www.apa.org/monitor/2024/03/military-sexual-assault-prevention-efforts#:~:text=within%20its%20ranks.-,The%20move%20comes%20after%20an%20estimated%2025%25%20increase%20in%20military,of%20People%20Analytics%2C%202023</a>).</p>	<p>The USMC is proposing to establish an expeditionary training environment on Tinian with a small supporting Base Camp. Outside of major training events, the Base Camp would support approximately 30 to 50 full-time personnel. Training units would arrive at the Military Lease Area to conduct training and leave after the training is completed. There would be no permanent training unit presence on the island.</p> <p>All military personnel scheduled to train in the CNMI receive pre-deployment and on-island briefings that emphasize cultural awareness, protection of wildlife, and compliance with environmental regulations. These requirements would be reinforced through unit-level training, Range Control procedures, and environmental protection protocols. The intent is to ensure that all personnel conduct themselves in a manner that respects the people, culture, and natural resources of the CNMI while carrying out training activities. DoD service members are held to a high standard of conduct, and</p>

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	<p>However, the Draft EIS fails to include this as a substantial potential risk for health and public safety. We are concerned with the risks of increased crime, and sexual and gendered violence that may result from the enlarged presence of military personnel. Many reports have shown that despite many efforts, sexual violence continues to rise in the U.S. military combined with a longstanding problem of:</p> <p><a href="https://www.npr.org/2024/07/12/nx-s1-5035032/sexual-assault-cases-involving-u-s-military-personnel-strain-relations-with-japan#:~:text=ANTHONY%20KUH%20BYLINE%3A%20In%20court,Two%20have%20resulted%20in%20arrests.">https://www.npr.org/2024/07/12/nx-s1-5035032/sexual-assault-cases-involving-u-s-military-personnel-strain-relations-with-japan#:~:text=ANTHONY%20KUH%20BYLINE%3A%20In%20court,Two%20have%20resulted%20in%20arrests.</a></p> <p><a href="https://www.stripes.com/branches/marine_corps/2024-07-22/okinawa-troops-alleged-sex-crimes-14558062.html">https://www.stripes.com/branches/marine_corps/2024-07-22/okinawa-troops-alleged-sex-crimes-14558062.html</a></p> <p><a href="https://www.asahi.com/ajw/articles/15352930">https://www.asahi.com/ajw/articles/15352930</a></p> <p><a href="https://theintercept.com/2021/10/03/okinawa-sexual-crimes-us-military/">https://theintercept.com/2021/10/03/okinawa-sexual-crimes-us-military/</a></p> <p><a href="https://www.militarytimes.com/news/your-military/2023/04/27/sexual-assault-in-the-military-keeps-rising-while-prosecutions-fall/">https://www.militarytimes.com/news/your-military/2023/04/27/sexual-assault-in-the-military-keeps-rising-while-prosecutions-fall/</a></p> <p><a href="https://www.npr.org/2023/03/12/1162861309/military-academies-sexual-assault-survey">https://www.npr.org/2023/03/12/1162861309/military-academies-sexual-assault-survey</a></p> <p><a href="https://www.hillandponton.com/facts-on-military-sexual-trauma-and-statistics/">https://www.hillandponton.com/facts-on-military-sexual-trauma-and-statistics/</a></p>	<p>the DoD would act promptly and rigorously to curtail any misconduct and enforce laws to protect citizens.</p>
79A	<p>My experience with the initial presence of the military and those contractors associated with the military build-up on island has been very, very negative. I am an owner of a small cattle ranch on Tinian and a member of the Tinian Cattlemen's Association. Early meetings with military representative revealed a plan to relocate some of the ranchers to areas that would be use by the military however, it was to be on a "year-to-year" basis. Prior to this information, another team informed the ranchers that depending on the distance of the site for relocation, there may be some compensation by the military.</p> <p>Other than subsistence farming that has sustained the local population for some time, cattle ranching as well as raising chickens, pigs, ducks, goats augmented the livelihood of the people. The absence of other economic activities such as commercial fishing and manufacturing kept people at the subsistence level. The gradual expansion of cattle ranching saw little increase in generating the much-needed cash to take care of family needs. Much of the goods are still imported are very, very expensive especially different varieties of meats.</p>	<p>As described in Section 4.1.3.1 (Training) of the Revise Draft EIS, current ranching activities would be minimally affected by training events. Ranchers would continue to have access to their cattle, and training operations would not alter or interfere with actively used agriculture areas. To minimize disruptions, the USMC would ensure that training activities do not interfere with grazing cattle and would provide clear detour information to affected ranchers during active training periods. In addition, as noted in Section 4.3.3.1 (Training), training in the Military Lease Area where ranching most often occurs would not change the amount of land currently available to ranchers. The USMC would provide access to water for active ranchers to provide water for ranching needs at tank dispensing sites. Allowing additional access to water in these locations would provide a benefit and may minimize the distance some ranchers may need to travel to obtain water, which would present a modest savings in time and money.</p>

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	<p>At meetings, military team would often state that they want to be “good partners” and “good steward” to the island as well as to the entire Micronesia region. This is contrary to my experience; I was instructed that I need to keep the size of my ranch at a certain acreage and, was told that the military needs to take 25 feet into my cattle ranch. The contractor opened and removed my fence and often times left the “ranch gate” unsecure. I would get calls from community members that my herds were in the middle of the road making it hazardous to drivers especially at night. Contractors often leave the fence unsecured resulting in herds wondering out of the fence. Contractor informed me that there was nothing in their contract that they would have to repair and restore the fences they removed. Military are of the position that they need that addition 25 feet. Contractor eventually repaired my fence but not to standards after much stress and struggle. Additionally, I've lost approximately 10-20 heads. I found the CNMI as well as the municipal government to be very unresponsive of the cattle industry in situation like mine. I was even told at one of our meetings that I “did not have any rights because I was simply a tenant.” The cattle industry is the only economic option at this time that has significantly expanded over the years with little or no support.</p> <p>The Rvsd. CJMT needs to be thoroughly explained to people so they truly understand what it means at a personal level; something that I had gone through being a rancher. The military will do anything they need to do to accomplish their goal and, based on my experience, they are not “good partners, are not “good stewards” and I no longer believe what they have to say. I feel like the local people are left to fend for themselves.</p>	
80A	<p>As an indigenous citizen of Tinian and a resident since birth, strongly recommend the following to preserve the safety, health and wellness of our people, and the peaceful cohabitation of our people and the federal government.</p> <p><b>NOISE POLLUTION</b></p> <p>The noise created by aircraft has been very disturbing to people like myself with health issue. I had experience with aircraft flying very low creating vibration that I felt deep through my body...somewhat like a "boon box blasting very close to me. The sound startled me and I was scared for me as well as for the safety of my grandchildren, on another occasion, I did not know that there was training going on the northern part of the island and took my family including my grandchildren for a picnic. On the way to the beach, I heard helicopters flying above with popping sounds like gun fire. I was startled and drove at high speed out of the area fearing for my children and grandchildren.</p>	<p>As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long training would occur. Range Control would also work with the Municipality of Tinian to identify in advance any holidays, festivals, or other important days for which public access is needed. Range Control may adjust range management strategies based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p> <p>The proposed training in the Military Lease Area, live-fire and aviation training, would generate elevated noise levels compared to the No Action Alternative. Based on the cumulative and single event noise levels described in Section 4.8 and Appendix J of the Revised Draft EIS, there may be some temporary disturbance to recreational users or individuals engaged in ranching and grazing in the Military Lease Area, but these effects would be limited in duration and scope. Noise levels in San Jose are not</p>

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	<p>Mr. Hashimoto responded that the popping sound was not a live gun fire. The point I was trying to make is that I did not get the information that there was training going on and that we needed to keep out of the area. Communication to the civilian population, at least for me and my family, failed. The safety of all people is of paramount concern and communication must be released days (3-5 days head) if not weeks ahead of time. Warnings must be in all official languages; Chamorro, Carolinian and English. If at all possible, there's been significant increase of the Filipino immigrants and warning must also include Tagalog. Perhaps windows designed to lessen noise should be installed by the CJMT at the Public Library, primary and secondary schools and the health clinics.</p>	<p>expected to exceed 65 decibel day-night average sound level. Therefore, the USMC is not considering replacing windows at this time.</p>
80B	<p>INTERRUPTIONS ON COMMERCIAL AIR TRANSPORTATION AND OTHERS</p> <p>I am also concern about medical evacuation of local people. I have a heart condition and I cannot be delayed in situation when I need medical services only available in Saipan. Emergency situation has to be under control of someone located in Tinian with the authority to make the decision to stop training determined to be barriers for all medical air evacuation. Heart patients like myself cannot delay medication intervention.</p> <p>MEDICAL EMERGENCY</p> <p>There must be an office with telephone contact information manned 24/7 to cease affected training activities to effectuate immediate respond to medical emergencies requiring hospital care out of Tinian, Saipan or Rota.</p>	<p>During training, Range Control is the on-island coordination point and would maintain communication with the Municipality of Tinian, CNMI emergency services, and aviation authorities. Standard operating procedures would be established for management of the Military Lease Area to provide for temporary suspension or adjustment of training to enable emergency movements, including medical evacuation (medevac) and essential air operations.</p>
80C	<p>ACCESSESSIBILITY</p> <p>I fish to subsidize my livelihood. The Firing Range as proposed will significantly and negatively impact on my fishing income. The Wahoo Run, Tuna Run, the Snapper areas and other seasonal fish will not be accessible during its season as the IES did not include a calendar align to the seasonal fishing that we depend. It is our tradition to remember and honour those that have since passed on at the site we loss them access to such sites must be allowed during the month of November.</p> <p>COST OF LIVING</p> <p>Re-directing of flight pattern will see increase of fuel and other organizational requirements to provide air transportation during training. This will inevitably be passed on to the consumers that would take domino effect. The same will happen to fishermen, tourism offering recreational boating activities and others.</p>	<p>As described in Sections 2.1.6 (Live-Fire Range Safety Areas) and 4.1 (Public Access) of the Revised Draft EIS, surface danger zones would be temporarily activated during scheduled live-fire events. These areas would not be permanently closed. Notification of surface danger zone activations would be made through the U.S. Coast Guard's Notice to Mariners system, along with other public communication channels. The USMC would work with the CNMI government and Municipality of Tinian to determine the appropriate methods to ensure mariners, including subsistence and night fishermen, receive timely and effective information. The USMC solicited suggestions from the community on the best means of communicating with the fishing and boating community. Input included multilingual notices, physical posting of schedule and other pertinent information at marinas, and use of social media or radio.</p> <p>As described in Section 2.1.8 of the Revised Draft EIS, Range Control would work with the CNMI government and Municipality of Tinian so that when training is scheduled, the community would have advance notice of where, when, and how long</p>

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	<p>This is an important component of the overall impact as it directly as results of both Air Force Divert Airport as well as the CJMT not to mentioned other activities such as those emerging from the MITT and MERC.</p>	<p>training would occur. Range Control may adjust range operating procedures for communication based on community feedback and new information to improve outcomes as needed (i.e., utilize adaptive management).</p> <p>To further offset the significant impact to subsistence fishers, the Final EIS has been updated in Table 2.3-1 to include the following proposed management measure:</p> <ul style="list-style-type: none"> <li>The DoD would work with CNMI to identify federal programs or funding sources needed to support the siting and installation of fish aggregating devices to offset the impacts to subsistence fishers.</li> </ul>
80D	<p>Significant number of people do not have computers or internet services in their home to allow for meaningful and purposeful review of the EIS. The document was made available on-line for those what can afford purchase of computer and internet services with no translations (Chamorro and Carolinian).</p> <p><b>USE OF OFFICIAL LANGUAGES</b></p> <p>All information for public consumption must be in the three (3) official languages of the CNMI (Chamorro, English and Carolinian). The Rvdsd. CJMT EIS did not get translated in its entirety for the public. Written form of the same was not available to all sectors of the community.</p> <p><b>USE OF AVAILABLE MASS MEDIA</b></p> <p>The most available media using the official three languages of the Commonwealth is the radio station (KKMP) as well as what the three island communities of SAIPAN, TINIAN and ROTA most commonly used shall also be used to disseminate information of which priority be information about the health and safety of the CNMI communities.</p> <p><b>EQUAL RESPONSIBILITY</b></p> <p>Each military branch whether it be the U.S. Marines, the U.S. Air Force or others must exercise prudence in the overall safety of people in the community. This includes reporting of incident to the appropriate civilian population (beyond the politically elected offices) to the constitutionally assigned agency, as well as the military designated agency.</p> <p><b>RECORDINGS OF MEETINGS AND CONDUCTS</b></p> <p>It must be a standard procedure for any military community outreach meetings to be recorded electronically; copies to be provided to all public libraries as well as to the CNMI Archive at the Northern Mariana College. This is to ensure that people are accountable of what agenda items were discussed, recommendations</p>	<p>After developing this training concept, the Marine Corps engaged the CNMI government in a series of virtual and in-person discussions on a revised training concept and revised environmental analysis between January 2020 and September 2024. In August 2023, the USMC held public information sharing sessions on the islands of Tinian, Saipan, and Rota to inform the public at large of the revised training concept.</p> <p>To encourage the sharing of information and discussion with the public, the USMC held the public meetings in June 2025 for the Revised Draft EIS in an open house format. Each poster station presented the analysis of a key resource and a representative was available to answer questions. Chamorro and Carolinian version translations of the fact sheet were available at the public meetings and on the project website. The Executive Summary in these languages was also made available to download from the project website and printed copies were available for review at the local libraries on Tinian, Saipan, and Rota. Additionally, the USMC held office hours in August 2025 at the Commonwealth Bureau of Military Affairs Tinian Field Office to provide an opportunity for additional public engagement prior to the end of the public comment period.</p> <p>The Revised Draft EIS was made available to the public as required by NEPA. During the public comment period, the USMC periodically checked to ensure the documents continued to be downloadable. Some individuals had difficulty downloading files from the project website, possibly because of the large file sizes. When this was brought to our attention, we immediately added reduced file sizes to the website to assist in downloading.</p> <p>Printed copies of the document were publicly available at libraries on Tinian, Saipan, and Rota.</p>

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	<p>made, and agreements reached by the parties concerned. It has been the experience of our local people when "promises" were made or commitments or statement that were never delivered or with people engaged in discussions with inappropriate behaviors unbecoming of professionals and must be held accountable as in the incident involving a representative of CJMT with a young lady at the Rota Outreach meeting.</p>	
80E	<p><b>OTHER SAFETY SYSTEM</b></p> <p>Installation of a Warning Sign - raising of red flags in highly visible and conspicuous areas at the harbor, marina area and other frequently used by the community to ensure that information is reaching the general population and Tinian. This is especially true for fishermen, tour operators and the general public in Saipan, Tinian and Rota as the ocean has been considered highways connecting the islands. Erect flag poles with designated colours (along with explanation) at the harbor, marina and other coastal areas along the route from Tinian to Saipan and to establish routes for ships and boats from Rota and Guam to be able to see and take the appropriate route.</p>	<p>Two surface radar towers would be located on the north and northwest coastline of Tinian. When live-fire training is conducted and one of the surface danger zones has been activated, there would be a lit red light on the towers, and a red flag would be flown. This practice is consistent with Marine Corps Order 3550.10 and other USMC range standard operating procedures. An additional safety feature is the surface radar housed in the towers would be used to survey the ocean surface to detect and provide an early warning to Range Control should a boat, or a member of the public or other non-participant, approach the activated surface danger zone from offshore. Should an unplanned encroachment be detected by Range Control (surface vessel or aircraft in the overlying airspace), all training would cease until the non-participant is out of the area. If the range is active prior to surface radar towers being constructed or if surface radar is down for maintenance, trained field spotters would be used. Spotters would be positioned at coastal observation points with unobstructed views of the surface danger zones and would maintain continuous visual surveillance of the ocean surface. Spotters would communicate directly with Range Control to provide early warning of any surface vessels or other non-participants approaching or entering an active danger zone.</p>
81A	<p>My initial reaction during the Community Outreach meeting conducted by the Dept. Of Defense team at the Tinian High School cafeteria was that of confusion as to the general or overall goal of the meeting. The manner in which the presentations was designed was to discourage meaningful discussions.</p>	<p>To encourage the sharing of information and discussion with the public, the USMC held the public meetings in June 2025 for the Revised Draft EIS in an open house format to encourage the sharing of information and discussion. Each poster station presented the analysis of a key resource and a representative was available to answer questions. Public comments could be submitted in writing, by mail, on the website or through a court reporter at public meetings. Comments could be submitted in any language, and Chamorro and Carolinian translators were available at public meetings. Additionally, the USMC held office hours in August 2025 at the Commonwealth Bureau of Military Affairs Tinian Field Office to provide an opportunity for additional public engagement prior to the end of the public comment period.</p>

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81B	<p>On one of the small groups addressing Noise pollution was particularly interesting. My experiences on the military aircraft "landings and take off" activities have been very disruptive on my family's sleeping pattern; the noise disrupt our sleep as the vibrations from the sound rattles our windows in addition to the loud sound making sleep impossible. Looking at the map in reference to my location and the rest of the Marpo Valley residents, we are sandwiched in between the Firing Range in Pina and the runways currently being used. The presenter shared that "a little increase of noise but nothing significant". That statement was inappropriate as it would be the local population that would determine what is "a little increase" and what is not. Noise that awakens anyone from one's sleep is significant that eventually will impact negatively on our health. Presentation should have been focused on what data has been gathered and not make inferences. While I am cognizant that the chances of the DoD relocation the runways as well as the Firing Range, DOD must be required to engaged in a joint planning team with the affected population in developing mitigations plan that would include, specific activities, timelines and evidence of completion. Mitigation must include replacement of windows, doors and other parts of the residential structure to reduce the noise and allow people to rest without interruption.</p>	<p>The Revised Draft EIS Section 4.8 (Noise) analyzed estimated peak sound levels for representative weapons and ammunition that would be used at the Multi-Purpose Maneuver Range and the Explosives Training Range at Mount Lasso. The Proposed Action does not include a range in the Pina area. Peak sound levels up to 104 decibels would reach as far as the southernmost runway at North Field and extend over the waters north and northwest of Tinian. At these levels, sound may cause a startle effect and would be considered moderately likely to produce annoyance especially for people who are not accustomed to hearing gunfire noise.</p> <p>Table 4.8-2 of the Revised Draft EIS presents the primary metric for significance analysis of potential noise impacts. The screening criteria for classroom learning impacts begins at 60 decibels day-night average sound level. Per the results presented in the Revised Draft EIS, other sensitive receptors on Tinian and Saipan that are typically inhabited (e.g., residential areas, churches) would experience levels under 60 decibels day-night average. Thus, additional noise reduction strategies and minimization measures such as specialized noise-reducing windows would not be warranted.</p>
82A	<p>1. Mitigate impacts to CNMI fishers through deployment of Fish Aggregating Devices (FADs).</p> <p>The EIS notes that temporary activation of the surface danger zone in waters north of Tinian during live-fire training could significantly affect fishing and boating. To offset this impact, the Navy should coordinate with CNMI Fish and Wildlife and the fishing community on Saipan, Tinian, and Rota to acquire and deploy FADs in accessible locations, ensuring that fish stocks remain available when access to traditional fishing areas is restricted.</p>	<p>The DoD does not install or relocate fish aggregating devices, as these are under the jurisdiction of CNMI resource management agencies. However, the Final EIS has been updated in Table 2.3-1 to include the following proposed management measure:</p> <ul style="list-style-type: none"> <li>• The DoD would work with CNMI to identify federal programs or funding sources needed to support the siting and installation of fish aggregating devices to offset the impacts to subsistence fishers.</li> </ul> <p>The USMC remains committed to coordinating with CNMI agencies, including the Division of Fish and Wildlife, to minimize impacts on local fisheries and ensure that public safety is maintained during training activities.</p>

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82B	<p>3. Commit to long-term study of Tinian groundwater impacts.</p> <p>While the EIS modeling concludes that new potable and non-potable wells will not affect water quality or salinity, the analysis naturally reflects only current conditions. Because the Tinian aquifer is critical to the island's population, it is essential to conduct continuous monitoring to confirm these projections. The Navy should partner with the CNMI government to fund and conduct ongoing studies to validate the model's conclusions and ensure the aquifer remains viable.</p>	<p>The analysis in Groundwater Modeling Technical Memorandum in Appendix M of the Revised Draft EIS evaluates current and future demand scenarios both in average and drought conditions.</p> <p>Annual CNMI Bureau of Environmental and Coastal Quality permitting requirements include reporting pumping volumes and water quality on a well-by-well basis. Based on this information, the Bureau of Environmental and Coastal Quality determines annually the allowable pumping volume for the following year.</p> <p>At the request of CNMI, the DoD would fund a one-time hydrogeological study to establish baseline data that could be used to support monitoring of Tinian's aquifer. This study would consist of groundwater sampling at existing well locations, and laboratory testing of water samples. In addition, the DoD would install up to four groundwater monitoring wells at each of the two live-fire ranges, establish a water monitoring plan, and include one year of baseline monitoring before ranges would become operational. The locations of wells would be determined in collaboration with CNMI Bureau of Environmental Quality (refer to Table 2.3-1 of the Final EIS).</p>
82C	<p>4. Expedite establishment of Range Control.</p> <p>The EIS calls for the creation of an on-island Training Area and Range Operations Command to manage scheduling, safety, and coordination with local officials. Accelerating the establishment of Range Control will not only enhance operational coordination but also provide consistent employment opportunities for local residents.</p>	<p>Once the Record of Decision is signed, the USMC would make establishment of Range Control a priority and work to expedite.</p>
82D	<p>5. Preserve International Broadcasting Bureau (IBB) employment.</p> <p>The IBB facility on Tinian provides stable employment that supports the local economy. In implementing CJMT activities, the Navy should work to maintain IBB employment levels to help offset potential job losses from other operational changes.</p>	<p>The USMC recognizes that the U.S. Agency for Global Media (USAGM, formerly IBB) provided employment opportunities for the residents of Tinian. The use of the USAGM facility while the range is being developed is currently under discussion with USMC leadership.</p>

<i>ID</i>	<i>Comment</i>	<i>Response to Comment</i>
83A	<p>First, the public comment process itself has been flawed, inaccessible, and extractive. For many in our community, full participation has been impossible. Chamorro and Carolinian translations of the RDEIS were not available until 17 days after the official public comment period began. This delay has materially limited the ability of our elders, families, and first-language speakers to access the information in time to respond meaningfully. Since at least June 23, 2025, key links have been broken on the project website, including document download portals. To this day, some remain inaccessible.</p> <p>These technical issues have further delayed public access and taken time away from the 75-day window, a window that is already insufficient given the size and scope of the materials. The decision to release this Revised EIS at the same time as another major environmental document, the M-I-T-T, MITT supplemental EIS, has made it even more difficult for community members to keep up, especially when there has been little to no public-facing explanation of the differences, overlaps, or cumulative impacts between the two proposals.</p>	<p>For the Revised Draft EIS public comment period, the USMC provided a 15-day extension for a total of 90 days.</p> <p>The Revised Draft EIS was made available to the public as required by NEPA. During the public comment period, the USMC periodically checked to ensure the documents continued to be downloadable. Some individuals had difficulty downloading files from the project website, possibly because of the large file sizes. When this was brought to our attention, we immediately added reduced file sizes to the website to assist in downloading. Printed copies of the document were publicly available at libraries on Tinian, Saipan, and Rota.</p> <p>The USMC understands there are multiple government actions being conducted in the CNMI, and the DoD has staggered the release of Environmental Impact Statements to provide opportunities for public review and comment.</p>
83B	<p>Finally, I must raise concern for the continued exclusion of the island of Luta from transparent and participatory processes. While no live-fire activity is formally proposed in the Revised EIS for Luta, we know that infrastructure developments are being advanced through categorical exclusions, a tactic that bypasses the full EIS process and eliminates any requirement for public hearings, environmental justice review, or community feedback.</p>	<p>The Proposed Action does not propose training activities or training infrastructure on Luta (Rota). Any future federal proposals for Luta would be subject to NEPA review.</p>