



# **PUBLIC INVOLVEMENT SUMMARY REPORT**

## **Mariana Islands Training and Testing Supplemental Environmental Impact Statement/ Overseas Environmental Impact Statement**

**June 2026**

**ID# EISX-007-17-USN-1744382878**

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**Mariana Islands Training and Testing  
Draft Supplemental Environmental Impact Statement/Overseas Environmental Impact Statement  
Public Involvement Summary Report**

This report includes a summary of public involvement and stakeholder outreach activities conducted by the Department of the Navy (lead agency), including both the U.S. Navy and the U.S. Marine Corps; the U.S. Air Force; the U.S. Army; and the U.S. Coast Guard (referred to as “Action Proponents”), during the public review and comment period for the Phase IV *Mariana Islands Training and Testing (MITT) Supplemental Draft Supplemental Environmental Impact Statement/Overseas Environmental Impact Statement (SEIS/OEIS)*. This report also summarizes public comments received during the Draft SEIS/OEIS public review and comment period, which was open from March 2 to May 1, 2026, Chamorro Standard Time (ChST). The National Marine Fisheries Service is a cooperating agency on the SEIS/OEIS.

The Action Proponents recognize the importance of engagement with the public and stakeholders and made significant efforts to encourage their participation and submission of comments. The purpose of public involvement during the Draft SEIS/OEIS public review and comment period was to:

1. Notify the public and stakeholders of the [availability of the Draft SEIS/OEIS](#) for review and comment and public involvement opportunities.
2. Disseminate information about the Proposed Action, the environmental analysis, and National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA) Section 106 processes; and
3. Provide an opportunity to comment on the Draft SEIS/OEIS and a means to submit information or comments regarding historic properties.

Involvement and outreach efforts were conducted in accordance with NEPA and military service guidance. Additional outreach efforts beyond those required by NEPA were taken to more broadly notify and inform the public. Examples of additional outreach efforts include:

- A 60-day comment period, 15 days more than the typical 45-day period
- Focused stakeholder briefings
- Multiple newspaper advertisements throughout the Study Area
- Notification letters and other direct mailings
- News releases and social media posts
- Abbreviated project fact sheets translated into three local languages
- A virtual presentation (including narration and transcript) on the project website
- Project video on the importance of training and testing and environmental stewardship efforts
- Public meetings on Guam and Saipan, including an open house information session and Navy presentation followed by a public oral comment session (similar to a traditional public hearing) with translators available
- Outreach meetings on Tinian and Rota, including an open house information session and Navy presentation with opportunities for written and recorded oral comments

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## **Summary of Public Involvement and Outreach Activities**

### **A. PUBLIC NOTIFICATION**

The Action Proponents prepared materials to notify the public of the availability of the [Draft SEIS/OEIS](#) and the public review and comment period. All public notices included information about the Proposed Action and why it is needed, public meetings, public commenting opportunities, the project website address, and information on how to access the virtual presentation. The Action Proponents disseminated notices beginning Feb. 27, 2026, ChST. The following is a summary of those notices.

#### ***Federal Register Notice***

The U.S. Environmental Protection Agency published a Notice of Availability of the Draft SEIS/OEIS in the *Federal Register* on Feb. 27, 2026.

#### ***Newspaper Advertisements***

Newspaper display advertisements were published in three local and regional newspapers in Guam and the Commonwealth of the Northern Mariana Islands (CNMI). The [advertisements for public meetings on Guam and Saipan](#) were published on March 2, 2026, and then again for three consecutive days in mid-March 2026, closer to the public meeting dates, including a Sunday (if publication schedule allowed). An [advertisement for the outreach meetings on Tinian and Rota](#) also appeared for three consecutive days in mid-March. Table 1 lists the newspapers and corresponding publication dates for each advertisement.

**Table 1: Newspaper Publications for the Notice of Availability/Notice of Public Meetings**

| Newspaper                  | Newspaper Coverage | Publication Frequency            | Publication Dates                                                                                                                                                                                        |
|----------------------------|--------------------|----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>The Guam Daily Post</b> | Guam               | Daily (print and online)         | Monday, March 2, 2026<br>Sunday, March 15, 2026<br>Monday, March 16, 2026<br>Tuesday, March 17, 2026                                                                                                     |
| <b>Pacific Daily News</b>  | Guam/CNMI          | Monday-Friday (online only)      | Monday, March 2, 2026<br>Monday, March 16, 2026<br>Tuesday, March 17, 2026<br>Wednesday, March 18, 2026                                                                                                  |
| <b>Marianas Variety</b>    | CNMI               | Monday-Friday (print and online) | Monday, March 2, 2026<br>Tuesday, March 17, 2026<br>Wednesday, March 18, 2026<br><b>Tinian and Rota meetings only:</b><br>Monday, March 16, 2026<br>Tuesday, March 17, 2026<br>Wednesday, March 18, 2026 |

#### ***Stakeholder Database/Mailing List***

The Action Proponents developed a stakeholder database/ mailing list that included 688 stakeholders from the 2020 MITT SEIS/OEIS as well as those who requested to be added to the mailing list during the MITT SEIS/OEIS scoping period and prior to the release of the MITT Draft SEIS/OEIS.

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### ***Stakeholder Notification Letters***

On Feb. 27, 2026, the Action Proponents mailed a total of 235 personalized stakeholder letters to federal and local elected officials and agencies. All letters offered a briefing upon request and provided a point of contact for questions.

### ***Postcard Mailer***

On Feb. 27, 2026, the Action Proponents mailed 454 postcards to nongovernmental organizations; community and business groups; research institutes; universities; fishing, aviation, and recreation groups; private companies; consultants; and individuals.

### ***News Release and Media Distribution***

Public Affairs Officers (PAOs) for Joint Region Marianas distributed a news release to the media on March 1, 2026, and it was made available on the website that day. The news release was redistributed prior to the Draft SEIS/OEIS public meetings in mid-March.

### ***Social Media Post***

A social media post was published on March 2, 2026, on the Navy's Stewards of the Sea Facebook page. Due to a Department of War-wide social media directive, no additional posts were made.

### ***Website Subscribers and Email Notifications***

The Action Proponents emailed 76 website subscribers on March 1, 2026. Website subscribers include those from the 2020 MITT SEIS/OEIS, the SEIS/OEIS scoping period, and new subscribers who completed the form on the MITT website prior to the release of the Draft SEIS/OEIS.

## **B. PUBLIC INFORMATION**

The Action Proponents developed and disseminated informational materials to provide the public with comprehensive, accurate, and timely information. These materials are described below.

### ***Project Website***

The Action Proponents established a [project website](#) to make information readily available to the public in one convenient location. During the Draft SEIS/OEIS period, information available on the website included:

- [Notice of Availability of the Draft SEIS/OEIS and public meetings](#)
- Proposed Action information, including purpose and need, alternatives analyzed, and description of military readiness activities
- [Draft SEIS/OEIS, appendices, and technical reports](#)
- Final reports from previous MITT phases
- Public notices
- Project fact sheets (English, CHamoru [Guam], Chamorro [CNMI], and Carolinian)
- [Project video](#)
- Virtual presentation
- [Map of the Study Area](#)
- [NEPA schedule](#)
- Public and outreach meeting details
- NEPA and [NHPA Section 106 processes](#), including a Section 106 consulting party informational request form

- Links to previous MITT/Mariana Islands Range Complex NEPA efforts and additional Navy resources

The public was able to submit comments via the website using the online comment form and subscribe to receive future notifications via email. The website was initially made available to the public on June 4, 2025, and project updates were implemented on Feb. 28, 2026, PST. All materials posted were compliant with Section 508 of the Rehabilitation Act. The website address ([www.nepa.navy.mil/mitteis](http://www.nepa.navy.mil/mitteis)) was included in all public notices and informational materials.

### ***Virtual Presentation***

The Action Proponents hosted a [virtual presentation](#) on the project website that outlined the key findings of the Draft SEIS/OEIS, summarized the NEPA and NHPA Section 106 processes, and provided information on Navy environmental programs. The public could view the presentation anytime during the Draft SEIS/OEIS public review and comment period. Audio narration and written transcripts accompanied each presentation slide.

### ***Stakeholder Briefings***

Action Proponent representatives briefed key stakeholders upon request during the public review and comment period. Stakeholders were informed on issues based on their area of interest, expertise, or jurisdiction. Table 2 includes a summary of stakeholder briefings conducted.

**Table 2: Stakeholder Briefings**

| Stakeholders                      | Conducted By       | Format of Outreach | Date           |
|-----------------------------------|--------------------|--------------------|----------------|
| CNMI Historic Preservation Office | U.S. Pacific Fleet | In Person          | March 19, 2026 |
| Tinian Mayor's Office             | U.S. Pacific Fleet | In Person          | March 20, 2026 |
| Rota Mayor's Office               | U.S. Pacific Fleet | In Person          | March 21, 2026 |

### ***Information Repositories***

The Action Proponents established five information repositories to make printed versions of project documents available to the public. The Draft SEIS/OEIS was mailed on Feb. 24, 2026, to:

- Robert F. Kennedy Memorial Library (University of Guam)
- Nieves M. Flores Memorial Library (Hagatna, Guam)
- Joeten-Kiyu Public Library (Saipan)
- Tinian Public Library (Tinian)
- Antonio C. Atalig Memorial Library (Rota)

### ***Fact Sheets***

The Action Proponents developed a 12-page [fact sheet booklet](#) which included the following topics:

- Proposed Action, including purpose and need
- Alternatives analyzed
  - No Action Alternative
  - Alternative 1 (Preferred Alternative)
  - Alternative 2
- Proposed military readiness activities
- MITT Study Area
- Importance of at-sea training, testing, and range modernization and sustainment

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- Summary of the environmental impact analysis
  - Marine resource protection
    - At-sea mitigation measures
    - At-sea environmental protection
    - Marine species population monitoring
  - NEPA process
  - NHPA Section 106 process
  - Public involvement opportunities, including public meetings
  - Commenting information

An abbreviated (two-page) version of the fact sheet was developed in English and translated into [CHamoru \(Guam\)](#), [Chamorro \(CNMI\)](#), and [Carolinian](#). Content and structure were consistent across languages. Downloadable copies of the fact sheets were posted on the project website, and printed copies were available at the briefings and public and outreach meetings.

### ***Public Meetings***

The Action Proponents held two [public meetings](#) on March 18 and March 19, 2026, ChST at locations listed in Table 3. The purpose of the meetings was to inform the public and stakeholders about the Proposed Action and the findings of the environmental analysis, answer questions, and solicit comments on the Draft SEIS/OEIS and the project's potential to affect historic properties. Each meeting included an open-house information session staffed by project representatives, a brief presentation by the Action Proponents, an opportunity to submit written and recorded oral comments, and a public oral comment session. Members of the public could arrive at any time during the event. Each meeting was three hours in duration.

Staff at the welcome station greeted attendees and encouraged them to sign in and be added to the project mailing list. English and local language fact sheets, a comment form, and a speaker request card were provided, along with verbal direction on the general flow of the poster stations and commenting methods.

Stations were set up around the room offering visual poster displays, fact sheets, comment forms, speaker request cards, and other handouts. Subject matter experts staffed each poster station to answer questions and provide project information. Printed copies of the Draft SEIS/OEIS were available for reference. Other previously approved public materials were also made available for viewing, such as information about Navy's marine species monitoring programs.

A comment station with tables, chairs, pens, and comment forms was provided to facilitate public commenting during the meetings. A certified court reporter was available via Zoom to record oral comments either one-on-one or during the public oral comment session. Individuals could submit completed comment forms at the meetings, by mail, or via the project website.

To provide a safe environment conducive to a constructive exchange of information between the project team and the public, and to minimize potential disruption and contention, security guards were visibly present at each public meeting. The security guards greeted meeting attendees and monitored the venue space.

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### *Posters*

The Action Proponents developed eight posters for use at the public and outreach meetings which included the following topics:

- Hafa Adai (at the welcome table)
- Proposed Action and Alternatives
- Importance of Military Readiness Activities
- Environmental Analysis – Marine Species
- Environmental Analysis – Other Resources
- Marine Resource Protection
- National Environmental Policy Act
- Cultural Resources and National Historic Preservation Act Section 106

### *Presentation and Oral Comment Session*

About one hour after the start of the public meetings, the program manager for U.S. Pacific Fleet gave an approximately 30-minute presentation. At the public meetings on Guam and Saipan, an oral comment session, in which members of the public had up to three minutes each to publicly provide verbal testimony, followed the presentation. A moderator opened and closed the comment session, reminding attendees of the commenting methods and inviting them to resume the open house if they had further questions. The court reporter transcribed the presentation and oral comment session at the Guam and Saipan public meetings.

### *Handouts*

The Action Proponents distributed a comment form and speaker request card to public meeting attendees. The comment form allowed attendees to submit written comments at the meeting or by mail. The speaker request card was available for meeting attendees who wished to provide a verbal comment during the public oral comment session. A sign-in sheet was available at the welcome table for meeting attendees to sign-in and request to be added to the project mailing list.

### *Media Kits*

The Action Proponents prepared media packets to provide the media with project information. Kits included the fact sheet, notice of availability/notice of public meetings, news release, and comment form. Persons identifying themselves as media at the public meetings received a media kit.

### *Meeting Summary*

Table 3 includes a summary of the public meetings held March 18 and March 19, 2026, ChST on Guam and Saipan. In total, 81 people attended the two public meetings. The public meetings were active and well-attended, with a wide variety of questions asked of subject-matter experts at the poster stations. Local media interviewed the program manager and other team members on- and off-camera. Meeting organizers encouraged the public to ask questions and submit comments, and members of the public submitted oral and written comments across both sessions for consideration in the Final SEIS/OEIS. Protestors attended both meetings and had respectful interactions with the team.

**Table 3: Summary of Public Meetings**

| Site/Date                                                                                                                                                                                                                                                                                                                                  | Attendance | Oral Comments | Written Comments |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|---------------|------------------|
| <i>Dededo Senior Center</i><br>319 Iglesias Circle<br>Guam<br>Wednesday, March 18, 2026<br>5 to 8 p.m.                                                                                                                                                                                                                                     | 37         | 9             | 2                |
| <b>Media Attendance:</b> <ul style="list-style-type: none"> <li>Guam Daily Post</li> <li>Pacific Daily News</li> </ul>                                                                                                                                                                                                                     |            |               |                  |
| <b>Organizations in Attendance:</b> <ul style="list-style-type: none"> <li>Guam Waterworks Authority</li> <li>Guam Environmental Protection Agency</li> <li>Guam Community Defense Liaison Office</li> <li>Guam Department of Public Health and Social Services</li> <li>Office of Senator Sabina Perez</li> <li>Prutehi Guahan</li> </ul> |            |               |                  |

| Site/Date                                                                                                                                                                                                                                                                          | Attendance | Oral Comments | Written Comments |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|---------------|------------------|
| <i>Crowne Plaza Resort</i><br>Coral Tree Ave.<br>Saipan<br>Thursday, March 19, 2026<br>5 to 8 p.m.                                                                                                                                                                                 | 44         | 4             | 0                |
| <b>Media Attendance:</b> <ul style="list-style-type: none"> <li>Pacific Daily News</li> <li>Marianas Press</li> <li>NMI News</li> <li>Marianas Agupa Radio Talk Show</li> </ul>                                                                                                    |            |               |                  |
| <b>Organizations in Attendance:</b> <ul style="list-style-type: none"> <li>CNMI Department of Land and Natural Resources</li> <li>CNMI Bureau of Environmental and Coastal Quality</li> <li>CNMI Commonwealth Bureau of Military Affairs</li> <li>Our Common Wealth 670</li> </ul> |            |               |                  |

### **Outreach Meetings**

The Action Proponents held two [outreach meetings](#) on Tinian and Rota to ensure government officials and residents were informed about the Proposed Action and the findings contained in the Draft SEIS/OEIS. The format of these meetings was similar to the public meetings on Guam and Saipan but did not advertise a public oral comment session. Oral comments were accepted and recorded through a digital recording device.

Welcome tables, poster stations, written comment tables, media kits, and handouts were identical to the public meeting descriptions above. The Navy presentation also followed the same format as the Guam and Saipan meetings.

### Meeting Summary

Table 4 includes a summary of the outreach meetings held on March 20 and March 21, 2026, ChST. In total, 16 people attended the meetings. Attendees engaged with the subject-matter experts at the poster stations and left one written and three recorded oral comments. Local media interviewed the program manager and other team members off camera.

**Table 4: Summary of Outreach Meetings**

| Site/Date                                                                                                      | Attendance | Oral Comments | Written Comments |
|----------------------------------------------------------------------------------------------------------------|------------|---------------|------------------|
| <i>Tinian Western Lodge</i><br>Canal St.<br>San Jose Village, Tinian<br>Friday, March 20, 2026<br>5 to 8 p.m.  | 12         | 0             | 1                |
| <b>Media Attendance:</b> <ul style="list-style-type: none"><li>Marianas Press</li></ul>                        |            |               |                  |
| <b>Organizations in Attendance:</b> <ul style="list-style-type: none"><li>Tinian Women's Association</li></ul> |            |               |                  |

| Site/Date                                                                                               | Attendance | Oral Comments | Written Comments |
|---------------------------------------------------------------------------------------------------------|------------|---------------|------------------|
| <i>Mayor's Conference Hall</i><br>5587+RMR<br>Tatachok, Rota<br>Saturday, March 21, 2026<br>3 to 6 p.m. | 4          | 2             | 0                |
| <b>Media Attendance:</b> <ul style="list-style-type: none"><li>Marianas Press</li></ul>                 |            |               |                  |
| <b>Organizations in Attendance:</b> <ul style="list-style-type: none"><li>From Luta, For Luta</li></ul> |            |               |                  |

### D. SUMMARY OF PUBLIC COMMENTS

***This section is intended to illustrate the main public concerns presented during the Draft SEIS/OEIS public review and comment period; it is not meant to capture all aspects of the comments or to serve as a legal record. Additionally, not all issues presented here are within the scope of the SEIS/OEIS. Substantive comments received during the Draft SEIS/OEIS public review and comment period will be responded to in the Final SEIS/OEIS.***

The Draft EIS/OEIS public review and comment period was open from March 2, 2026, to May 1, 2026, ChST. The Action Proponents received 39 comments during the public review and comment period. Public comments were received in-person at the public and outreach meetings (written: 3, verbal: 15), via the website comment form (14), via email (6), and via postal mail (1). Please note that if a comment was submitted by the same person or group more than once via different methods, e.g., the same comment was submitted by mail and the website by the same person, it was only counted once. Additionally, one comment submission may include comments on multiple resource areas or topics.

Comments were received from elected officials, government agencies, organizations, and individuals. Table 5 includes a breakdown of commenters.

The Action Proponents reviewed, compiled, logged, and discussed the impact, significance, and relevance of the comments, as well as the substantive issues and concerns of communities, during the preparation of the Final SEIS/OEIS. All comments submitted through the appropriate channels during the Draft EIS/OEIS public review and comment period are part of the public record.

**Table 5: Comments Received by Stakeholder Category**

| Stakeholder Category (Total)              | Entity Name                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Elected officials/government agencies (8) | <ul style="list-style-type: none"> <li>• Congressman James Moylan</li> <li>• Acting Governor of Guam Joshua Tenorio</li> <li>• Guam Community Defense Liaison Office</li> <li>• Guam Senator Sabina Perez</li> <li>• Guam Senator Therese Terlaje</li> <li>• U.S. Environmental Protection Agency Guam Waterworks Authority</li> <li>• Guam Environmental Protection Agency</li> <li>• CNMI Department of Land and Natural Resources - Division of Fish and Wildlife</li> </ul> |
| Nongovernmental Organizations (4)         | <ul style="list-style-type: none"> <li>• Prutehi Guahan</li> <li>• Our Common Wealth 670</li> <li>• From Luta, For Luta</li> <li>• Tinian Women's Association</li> </ul>                                                                                                                                                                                                                                                                                                        |
| Individuals (20)                          | <ul style="list-style-type: none"> <li>• <i>Individual names excluded from table</i></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                 |

Table 6 includes a summary of public comments to provide a brief overview of the general issues or concerns expressed during the Draft SEIS/OEIS public review and comment period. The Action Proponents appreciate public and stakeholder participation in this important process.

**Table 6: Summary of Public Comments**

| Resource Area/Topic                                                        | Issue/Concern                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|----------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| General Project/<br>Environmental<br>Impact Analysis/<br>Scope of Analysis | <ul style="list-style-type: none"> <li>• Draft SEIS and public involvement materials are too complex for non-experts to understand; plain-language explanations of military and technical terminology are needed.</li> <li>• Explanation needed of how "less than significant" impact determinations were reached.</li> <li>• Contextualization needed of what "minimal impacts" mean in practice.</li> <li>• Revisions to Draft SEIS needed to address identified deficiencies before final decision documents or authorizations are issued.</li> <li>• Clarification needed on when past activities started.</li> <li>• Prior publications should be listed and hyperlinked for easy access.</li> <li>• Dive and Salvage Operations/Underwater Construction section lacks the specificity required for an adequate impact baseline.</li> <li>• Cross-reference previous military analyses in the Study Area to show relationship to the 2026 MITT analysis.</li> </ul> |

| Resource Area/Topic                                                                    | Issue/Concern                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|----------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| General Project/<br>Environmental<br>Impact Analysis/<br>Scope of Analysis<br>(cont'd) | <ul style="list-style-type: none"> <li>• Military readiness activities risk the health of reefs, soil, air, and other important environmental aspects.</li> <li>• Referenced technical reports are inaccessible.</li> <li>• Clarification needed on how forthcoming CNMI Joint Military Training Final EIS will create a standalone analysis covering land-based training and related logistical support activities on CNMI.</li> <li>• Final SEIS should: <ul style="list-style-type: none"> <li>○ Adopt a data-driven and regionally specific framework.</li> <li>○ Incorporate dynamic baselines that adjust for climate change.</li> <li>○ Fully evaluate cumulative impacts from transboundary and foreseeable industrial activities.</li> <li>○ Ensure mitigation measures reflect the cumulative analysis.</li> </ul> </li> <li>• Question on whether the environmental analysis considered the cumulative impacts of construction of data centers and laying of fiber optics cables by third parties in support of the military. <ul style="list-style-type: none"> <li>○ Question on whether freshwater demands from the above infrastructure were included in the Draft SEIS.</li> </ul> </li> <li>• The SEIS should include land-based activities to understand effects on freshwater resources.</li> <li>• Lack of analysis of land-based activities is inconsistent with the intent of the 2025 updates to NEPA.</li> <li>• Question on whether the number of land-based personnel supporting MITT activities has increased since 2015, which may affect Guam's aquifer.</li> </ul>                                                                                   |
| Proposed Action and<br>Alternatives                                                    | <ul style="list-style-type: none"> <li>• Requests to adopt the No Action Alternative.</li> <li>• Training intensity will increase and further stress the environment.</li> <li>• Questions on why military readiness activities must take place in the Mariana Islands.</li> <li>• Military does not listen to the wishes of Guam residents when it conducts military readiness activities.</li> <li>• Military bases on Guam do not make it safer.</li> <li>• Data sheets do not compare past activities with current proposed changes.</li> <li>• An expanded range of alternatives should be considered, including: <ul style="list-style-type: none"> <li>○ Expanded near-shore buffer areas around the CNMI.</li> <li>○ Seasonal restrictions to protect marine life.</li> <li>○ Reduced activity in sensitive areas.</li> <li>○ Increased use of simulation.</li> </ul> </li> <li>• Training should be conducted without live ordnance and via simulation only.</li> <li>• Question on whether the ongoing Iran War will lead to changes in the analysis regarding mine warfare, unmanned craft, and munitions priorities.</li> <li>• Question regarding how changes in Japanese leadership and defense policies will affect Japanese engagement in MITT activities.</li> <li>• Question on whether the termination of proposed Singapore Air Force basing at Andersen Air Force Base will impact multinational training plans.</li> <li>• References used to decide proposed changes in MITT and SURTASS-LFAS-TT since 2019 should be provided.</li> <li>• Military activities are evaluated in isolation rather than as part of a cumulative system of impacts.</li> </ul> |

| Resource Area/Topic                       | Issue/Concern                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Proposed Action and Alternatives (cont'd) | <ul style="list-style-type: none"> <li>• Question on the need for large-scale training in the Marianas Trench Marine National Monument given the high risk to biological diversity and scientific importance.</li> <li>• Greater transparency with Guam and CNMI needed regarding foreign military participation and types of operations.</li> <li>• Request that the No Action Alternative be considered in the Final EIS.</li> <li>• Analysis is incomplete due to omission of listed activities, such as Joint Expeditionary Exercises.</li> <li>• Clarification needed on whether gunnery, missile, bombing, and torpedo exercises involve physical testing or simulations.</li> <li>• Proposed levels of activities in Alternatives 1 and 2 are too similar to provide meaningful analytical contrast.</li> <li>• An action alternative is needed that prioritizes reduced impacts, such as noise levels and explosives use.</li> <li>• Scaled, alternative, or regionally distributed training strategies should be evaluated to reduce concentrated impacts on the Mariana Islands.</li> <li>• Action Proponents should identify which land-based training areas on Guam are included or excluded from the analysis.</li> <li>• Question on whether analyses from prior NEPA documents within the Study Area are being carried forward for those land areas.</li> <li>• Information, such as maps and tables, identifying each Guam-based land training exercise and activity by name, location, and status is needed.</li> <li>• Information needed regarding new training-area activations, deactivations, or footprint changes on Guam since 2010 and whether those changes were analyzed under NEPA.</li> <li>• Clarification needed on how pier-side activities at Apra Harbor, including sonar maintenance and testing, are addressed in the Draft SEIS.</li> <li>• Description needed of how the Draft SEIS addresses transient logistical support activities (aircraft, vessels, equipment, and personnel) and associated impacts on Guam.</li> <li>• A revised SEIS that includes full analysis of off-installation emergency impacts is needed.</li> <li>• Coordination between the Navy and Guam's emergency services is needed.</li> <li>• Action Proponents should support additional response capacity for Guam emergency services.</li> <li>• Impacts of population increases should be incorporated into Final SEIS.</li> <li>• Agencies should prepare unified comments to reinforce need for a public safety analysis.</li> <li>• Draft SEIS should more clearly explain the scope of the Proposed Action in relation to Guam.</li> <li>• Request for Navy to upgrade analytical methodologies to understand operational support effects.</li> <li>• Navy should ensure conclusions rely on most current data rather than sole reliance on programmatic analyses.</li> <li>• Final SEIS should account for community impacts such as fishing restrictions, food security, maritime access, and public safety.</li> <li>• Request that the Navy show greater transparency on the status of prior commitments and the technical record supporting current conclusions.</li> </ul> |

| Resource Area/Topic                       | Issue/Concern                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| Proposed Action and Alternatives (cont'd) | <ul style="list-style-type: none"> <li>• Navy should perform a technical re-evaluation that considers the effects of Super Typhoon Sinlaku before issuing the Final SEIS.</li> <li>• Alternatives analysis is inadequate under NEPA.</li> <li>• Alternative 2 calls for a 38% increase in explosive detonations, which requires reevaluation of impacts on deep-diving species.</li> <li>• NMFS should conduct an independent review of the analysis.</li> <li>• Claim that 10 new activities are "consolidations" of existing practices is flawed.</li> <li>• USV testing involves explosives, lacks a historical baseline, and demands substantive review rather than being labeled a consolidation.</li> <li>• Detailed, annotated maps for 10 new activities and boundaries of mitigating "No Training Zones" for Saipan, Tinian, Rota, and Farallon de Medinilla are needed.</li> </ul>                                                                                                                 |
| Air Resources                             | <ul style="list-style-type: none"> <li>• Air quality conclusions are unsubstantiated due to a lack of current baseline data for Guam.</li> <li>• Military greenhouse gas emissions must be evaluated within the broader context of climate change.</li> <li>• Clarification on whether air quality and emissions analysis is based on aircraft "time-in-mode" values.</li> <li>• Question on whether emissions from aircraft ground support equipment and range support vehicles were excluded from the analysis.</li> <li>• Suggestion to use the FAA Aviation Environmental Design Tool for more accurate aircraft emissions estimates.</li> <li>• Lead was omitted from the emissions inventory without justification.</li> <li>• Airborne trace metals and fine particulate matter from munitions combustion and detonation were inadequately assessed.</li> </ul>                                                                                                                                       |
| Sediments and Water Quality               | <ul style="list-style-type: none"> <li>• The SEIS should include a comprehensive assessment and updated analysis on water demand, water quality, and impact from emerging contaminants, metals, and PFAS on ground water and offshore ecosystems.</li> <li>• The Draft SEIS does not include evaluation of risk to Lens aquifer.</li> <li>• The analysis relies on a single deep-ocean study and ignores coastal contaminant risks on Guam.</li> <li>• There is a lack of new empirical data for metal toxicity and bio magnification in nearshore environments.</li> <li>• Concerns regarding the treatment of CNMI water quality and antidegradation standards.</li> <li>• Concerns about the dismissal of bioaccumulative contaminants in sediment without recent sampling, and the use of CNMI water quality standards missing current PFAS and aquatic life criteria.</li> <li>• Cumulative contaminant accumulation in marine food webs is ignored in favor of threshold-based assumptions.</li> </ul> |
| Seabirds                                  | <ul style="list-style-type: none"> <li>• Question on whether FDM is a bird sanctuary.</li> <li>• Bombing exercises on FDM harm migratory birds.</li> <li>• Requests for more research on the interaction between UAS recovery operations and nesting seabird colonies.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Fishes                                    | <ul style="list-style-type: none"> <li>• Military readiness activities, such as bombing, will damage fish populations.</li> <li>• Analysis conclusions on fish impacts are not supported by extensive data.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

| Resource Area/Topic        | Issue/Concern                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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| Fishes (cont'd)            | <ul style="list-style-type: none"> <li>• Question on how proposed temporary mines differ from those previously used in Apra Harbor that resulted in fish kills.</li> <li>• Request for a specific definition of "small amount" regarding the number of fish expected to overlap with where explosions occur.</li> <li>• Fish kills from explosions attract sharks and exacerbate local shark depredation problems for fishermen.</li> <li>• The abundance analysis for sharks and rays is inadequate.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Marine Mammals/<br>Species | <ul style="list-style-type: none"> <li>• Questions regarding acoustic effects of sonar and underwater explosions on marine mammals and sea turtles.</li> <li>• Interest in data on the effects of sonar as the water depth reduces, and if that will impact the locations whales and sea turtles favor.</li> <li>• Question on whether the Action Proponents are sharing marine mammal research with GovGuam agencies and University of Guam scientists.</li> <li>• Question on how the analysis considers the stress of sonar noise combined with other sources of ocean noise on marine mammals.</li> <li>• Concern about possible data gaps for baseline data and mitigation measures regarding sea turtles, rays, sharks, and beaked whales.</li> <li>• Doubts expressed that military readiness activities will have only limited impact on marine life.</li> <li>• Question on whether or how sonar use affects beaked whales.</li> <li>• Questions on how breeding sites were determined and whether all training actions avoid humpback whale breeding sites and seasons.</li> <li>• Request to share data on sperm whale breeding.</li> <li>• Question on how training areas or seasonal use will be modified if "take" incidents of protected species are observed.</li> <li>• The Navy should implement a policy to use sonar for 24/7 monitoring of marine mammals.</li> <li>• Question on how monitoring observation data will be shared in real-time with all participants and agencies.</li> <li>• Activities in the action alternative would have significant cumulative impacts on marine mammals and sea turtles.</li> <li>• Issuance of marine mammal take permits should be halted.</li> <li>• Characterizations of sonar and explosive impacts on marine species as "less than significant" fail to account for repeated exposure and cumulative stressors.</li> <li>• The Navy analysis is predictive and model-driven.</li> <li>• Indirect effects on prey species from sonar and explosives are dismissed without localized evaluation.</li> <li>• The SEIS fails to document or verify previous beaked whale research and stranding initiatives to which the Navy committed.</li> <li>• Protected Species Observers should be NMFS-approved based on demonstrated field experience rather than only certification.</li> <li>• Sea turtle vessel strike risks are termed rare without addressing all available records.</li> <li>• Concerns regarding the sensitivity of the seafloor and requests for clarification and maps detailing seafloor activities.</li> <li>• Requests to provide marine mammal, sea turtle, and shark abundance baselines.</li> </ul> |

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| Marine Mammals/<br>Species (cont'd) | <ul style="list-style-type: none"> <li>• Question about how military readiness activities can continue to be authorized without updated marine animal data to support claims.</li> <li>• Requests for Maritime Environmental Response training to account for vessel strike risks and impacts to ESA-listed species.</li> <li>• Reliance on behavioral data and visual observation is ineffective for mitigating impacts on sea turtles and other species.</li> <li>• Concern regarding statistical flaws in the NAEMO.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Marine<br>Habitats/Coral Reefs      | <ul style="list-style-type: none"> <li>• Military readiness activities will have negative long-term impact ocean ecosystem and reefs.</li> <li>• Request the Final SEIS include additional mapping to address gaps in substrate mapping discussed in Appendix F of the Draft SEIS.</li> <li>• The environmental analysis should include effects of the ocean bed mining proposed by BOEM.</li> <li>• Request to update Figure 3.2.1 to include GovGuam's coral nursery located near the Glass Breakwater.</li> <li>• Request to update Table 3.8.1 to show the Tridacna squamosa (giant clam) occurs commonly in Guam and CNMI and is not extirpated.</li> <li>• Coral and giant clam species proposed for listing in the Endangered Species Act at FDM are at risk from MITT actions.</li> <li>• Question on whether the Navy avoids impacts to volcanoes and hydrothermal vents in the Marianas Trench Marine National Monument.</li> <li>• Unexploded ordnance and unrecovered munitions may continue to contaminate marine ecosystems.</li> <li>• Marine pollution from discarded parachutes and equipment can entangle marine life and damage seabed habitats.</li> <li>• Bombing exercises on FDM cause erosion that negatively impacts the nearshore coral.</li> <li>• Request for the SEIS to include Standard Operating Procedures and mitigation plans specifically designed for marine habitats.</li> <li>• Request that the Navy strengthen environmental analysis for Guam's marine and coastal resources.</li> <li>• The SEIS assumes coral recovery without requiring site-specific surveys, interagency collaboration, or restoration funding.</li> <li>• Requests for Port Damage Repair impact determinations to be cross-referenced against the sensitivity of nearshore coral ecosystems.</li> <li>• Question regarding the effectiveness of 350-yard mitigation zones to protect shallow coral reefs.</li> </ul> |
| Terrestrial Species<br>and Habitats | <ul style="list-style-type: none"> <li>• Request that the SEIS include an updated analysis of land-based activities on Saipan, Tinian, and Rota.</li> <li>• Analysis omits possible brush fire ignition from training activities.</li> <li>• Analysis fails to detail specific terrestrial activities and omits prior environmental vulnerability assessments for land-based operations.</li> <li>• Concerns about population levels of Micronesian megapodes on FDM.</li> <li>• Standard operating procedures and "No Live-Fire" zones are failing to protect habitats.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Public Health and<br>Safety         | <ul style="list-style-type: none"> <li>• Sonar activities could harm recreational divers in nearshore waters. <ul style="list-style-type: none"> <li>○ Interest in whether acoustic impact studies have been conducted for waters within one mile of shore.</li> </ul> </li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

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| Public Health and Safety (cont'd)                  | <ul style="list-style-type: none"> <li>• Question on how the people of Guam can be kept informed of health impacts related to training and testing.</li> <li>• Military readiness activities are negatively impacting residents' health.</li> <li>• The use of explosives will cause health impacts to the public, including release of PFAS.</li> <li>• The U.S. military is disregarding the health and safety of Guam's citizens, including children.</li> <li>• Request that citizens of Guam be compensated for past and future environmental effects of military activities.</li> <li>• Lack of clarity on whether the Navy will use open detonation for mine neutralization at sea, which may release hazardous and carcinogenic chemicals.</li> <li>• The Proposed Action will introduce vessel traffic, air emissions, and explosive activities that extend risks into civilian areas.</li> <li>• The Draft SEIS does not evaluate risks of military activities and the increasing military population stressing emergency services.</li> <li>• The analysis does not include analysis of PFAS, pesticides, or dieldrin.</li> <li>• The Draft SEIS does not assess risks of hazardous emissions from munitions or aircraft.</li> <li>• The analysis does not evaluate potential impact of marine and land-based rescue efforts.</li> <li>• The gaps in Draft SEIS will strain Guam emergency services and reduce the island's resilience.</li> <li>• The Action Proponents should clarify whether range support operations were included in the analysis.</li> <li>• The analysis should include identification, management, and contingency planning for military munition hazards in civilian areas.</li> <li>• Request for an expanded analysis of public safety hazards and civilian aviation risks posed by military aircraft operations.</li> <li>• The analysis should address navigation safety measures for civilian maritime traffic.</li> <li>• The SEIS lacks sufficient detail on emergency response procedures, public notification methods, and falling debris hazards.</li> <li>• Request to clarify whether operational noise footprints include increased aircraft and vessel activities at military installations. <ul style="list-style-type: none"> <li>○ Relying on a DNL 65 noise threshold violates CNMI constitutional protections against harmful noise.</li> </ul> </li> </ul> |
| Cultural Resources/<br>NHPA Section 106<br>Process | <ul style="list-style-type: none"> <li>• Offer to share information about submerged cultural resource locations.</li> <li>• Request to enlarge map on page 3-80 to a full page and provide exact locations of all shipwrecks and submerged airplane wrecks.</li> <li>• Compilation of shipwrecks and aircraft wrecks is inadequate.</li> <li>• Analysis does not include new information on submerged cultural resources.</li> <li>• Action Proponents need a public plan for how they will preserve submerged cultural resources that shows training and testing locations and avoidance requirements.</li> <li>• Concern governments of Japan and Germany, as well as the Navy History and Heritage Command, have not been notified of the Draft SEIS.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

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| Cultural Resources/<br>NHPA Section 106<br>Process (cont'd) | <ul style="list-style-type: none"> <li>○ Request that sunken Japanese and German vessels be treated as property of those countries.</li> <li>• The Sunken Military Craft Act should apply to the USS Penguin, Gamble, and Yosemite. <ul style="list-style-type: none"> <li>○ Question on whether the Archaeological Resources Protection Act should apply and if World War II-era ship and aircraft wrecks can be considered “archaeological resources” when they are less than 100 years old.</li> <li>○ Concern there is no federal land manager assigned for submerged shipwrecks and aircraft.</li> </ul> </li> <li>• Question on how cumulative impacts on ocean use for cultural activities were analyzed.</li> <li>• Question on whether the Action Proponents are aware of an ongoing study conducted for BOEM on cultural and maritime heritage on Guam.</li> <li>• Question on if long-time fishing areas for Guam fishermen are considered “traditional cultural properties.”</li> <li>• MITT restrictions will inhibit navigation of flying proas by the CHamoru and Carolinian residents.</li> <li>• NHPA consultation was inadequate and should have included local government officials, indigenous groups, and the public.</li> <li>• Final EIS should incorporate updated, location-specific data informed by direct engagement with CNMI stakeholders, including fishers, cultural practitioners, and local communities.</li> <li>• Question on whether the Action Proponents will use Dr. Jennifer McKinnon’s research on submerged artifacts and marine heritage.</li> <li>• Concerns the number of historic properties depicted in Figure 3.11-1 and described within the text under-represents potential and known historic properties within Marianas’ territorial waters.</li> <li>• MITT planning should incorporate pre-disturbance remote sensing surveys for any operational areas where bottom impact is anticipated.</li> <li>• The analysis does not account for the connection indigenous peoples of the Mariana Islands have with the ocean.</li> <li>• The 2020 Guam PATT creates management gaps for cultural resources located outside the three-nautical-mile limit or on land.</li> <li>• The Navy did not make a reasonable and good faith effort to identify historic properties within the MITT Study Area.</li> <li>• Neutralization activities near Hågat and Asan beaches may adversely affect CHamoru traditional fishing and cultural practices.</li> <li>• Recommendation to consult CHamoru organizations to identify Traditional Cultural Places, rather than relying on contracted anthropologists.</li> <li>• Concerns regarding mitigation for public access to terrestrial cultural sites.</li> <li>• Archaeological surveys of submerged areas around FDM are incomplete due to magnetic interference from heavy metal refuse, masking potential cultural resources.</li> <li>• Chamorro and Refaluwasch communities should have been engaged regarding FDM as a sacred cultural landscape.</li> </ul> |
| Socioeconomics                                              | <ul style="list-style-type: none"> <li>• Sonar activities could harm recreational diving businesses and tourism.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

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| Socioeconomics<br>(cont'd)       | <ul style="list-style-type: none"> <li>• Question on whether fishing area closures would include the waters near the Ritidian firing range.</li> <li>• Question on how cumulative impacts on subsistence fishing were analyzed.</li> <li>• Action Proponents should consider moving training away from W-517 to allow for more fishing.</li> <li>• Draft SEIS does not account for potential adverse effects on fish stocks.</li> <li>• Military testing may harm the economy by affecting reef fish, marine mammals, and sea turtles.</li> <li>• MITT activities should not be allowed to affect “Distant Waters Fishing Nations” from applying for permits to fish in the Exclusive Economic Zone of the Federated States of Micronesia.</li> <li>• Training in Agat Bay would severely impact local fisheries, recreation, and the dolphin-watching tourism industry.</li> <li>• Question on whether explosives training would be allowed in Agat Bay.</li> <li>• Question regarding which areas around the Mariana Islands will be closed to fishing due to SURTASS-LFAS-TT and when this may occur.</li> <li>• Restricted access to fishing grounds and disrupted fish behavior will harm subsistence and commercial fishing practices.</li> <li>• Toxin bioaccumulation in marine organisms from weapons testing threatens regional food security and public health.</li> <li>• Analysis fails to quantify the impact of access limitations and provide mitigation measures.</li> <li>• Increased demand on limited infrastructure should be quantified.</li> <li>• Socioeconomic analyses use narrow metrics, ignoring subsistence fishing, informal economies, impacts to intangible cultural heritage, and environmental justice.</li> </ul> |
| Mitigation Measures and Research | <ul style="list-style-type: none"> <li>• Question on how the Navy will mitigate effects on marine life from military readiness activities other than preliminary studies.</li> <li>• Marine mammal mitigation procedures are not well explained and will not protect marine life.</li> <li>• Question on how the Navy will prioritize further research while it trains in the MITT Study Area and what the process is for understanding the impacts of training through simultaneous research.</li> <li>• Marine mammal harm mitigation measures are inadequate.</li> <li>• Mitigation measures are based on outdated or incomplete baseline assumptions.</li> <li>• Question on how the Navy decided its proposed mitigation measures were adequate given the changing ocean environment.</li> <li>• Question on how the Action Proponents will monitor whether their environmental protection measures are working.</li> <li>• Stronger marine mammal mitigation measures are needed, including extended pre- and post-activity monitoring periods, increased use of passive acoustic monitoring, more conservative stand-off distances, and clear, publicly available reporting of incidents and observations.</li> <li>• Question on whether the SEIS will incorporate data from research cruises in the 2025-26.</li> <li>• Request to test only in areas with low densities of marine life and limiting testing during marine mammal migration.</li> </ul>                                                                                                                                                                                                                                                                                      |

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| Mitigation Measures and Research (cont'd) | <ul style="list-style-type: none"> <li>• MITT leadership should work with local government and cultural practitioners to better identify how to minimize the effect of military readiness activities on local communities.</li> <li>• No results have been made public on fulfilling mitigation requirements and no ongoing research has been released on impacts.</li> <li>• Significant data gaps remain on the toxic effects of military explosives on human populations and ecosystems.</li> <li>• The Action Proponents should reevaluate the assumptions underlying resource area impact determinations.</li> <li>• The Navy needs to perform additional research on invasive species pathways and other stressors.</li> <li>• Mitigation effectiveness is assumed rather than evaluated using site-specific analyses or monitoring outcomes.</li> <li>• Request to consider enhanced mitigation measures and require updates to reporting and monitoring.</li> <li>• Questions whether the Navy will install moorings to mitigate destruction to nearshore coral habitat caused by anchoring ships off the Saipan coastline.</li> <li>• Military needs to improve coordination with local agencies for activities in Ports and Industrial Areas.</li> <li>• Geographic constraint exceptions handled via a "chain of command" lack oversight, requesting real-time reporting.</li> <li>• Concerns on deficiencies in data sources, flaws in "take" models, and data gaps regarding cultural resources.</li> <li>• Concerns over the efficacy of Navy Lookout Teams compared to trained biologists.</li> <li>• The Navy should perform transparent incident reporting summaries and the integrate third-party observers to prevent the underreporting of "takes".</li> <li>• The Navy lacks a mitigation plan to physically recover military expended materials.</li> </ul> |
| Cumulative Effects                        | <ul style="list-style-type: none"> <li>• Draft SEIS does not include a cumulative impact analysis for federal and non-federal activities in the Pacific. <ul style="list-style-type: none"> <li>○ Cumulative environmental, cultural, and social impacts of proposed military activities are not being measured.</li> <li>○ Proposed deep seabed mining activities in the Study Area should be included.</li> <li>○ Request that Action Proponents coordinate with BOEM, NOAA mining permitting offices, and the International Seabed Authority on cumulative impacts analysis.</li> <li>○ A robust cumulative impact analysis that addresses environmental sustainability and economic resilience is needed.</li> </ul> </li> <li>• Cumulative acoustic thresholds within Apra Harbor for pierside sonar testing should be reported.</li> <li>• Years of military training and testing introduced environmental contamination and negative health impacts.</li> <li>• Requests for long-term study of environmental, cultural, and health consequences from military activities, including explosive detonations.</li> <li>• Separation of the review of land-based and at-sea activities ignores combined impacts.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

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|                                     | <ul style="list-style-type: none"> <li>The analysis omits compounding sociocultural effects and local climate impacts from project-level greenhouse gas emissions.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| NEPA Process and Public Involvement | <ul style="list-style-type: none"> <li>Time made available for public participation is too restrictive. <ul style="list-style-type: none"> <li>Comment period is too short for a 700+-page document.</li> <li>Requests to extend the comment period.</li> <li>Lack of a comment period extension due to Super Typhoon Sinlaku reflects poorly in terms of public engagement.</li> <li>Request to publish a revised Draft SEIS when the community can meaningfully review it.</li> </ul> </li> <li>Public involvement efforts were not meaningful. <ul style="list-style-type: none"> <li>Public meetings were poorly publicized.</li> <li>Oral comment time allotment of three minutes at public meetings is inadequate.</li> <li>Problems with online comment portal.</li> <li>All potentially impacted communities and community members could not participate.</li> <li>Public comments were not seriously considered in the analysis.</li> <li>Guam-based Palauans and others from the Federated States of Micronesia should have been better engaged.</li> <li>Project representatives did not sufficiently answer questions at public meetings.</li> <li>Explanation needed of how public scoping comments were incorporated in the environmental analysis.</li> <li>Responses to past scoping comments were inadequate.</li> </ul> </li> <li>Continued expansion of activities without updated data places burdens on the community and agencies to review and respond.</li> <li>Request for in-person hearings with translation and release of five-year monitoring data.</li> <li>Question on whether staffing and budget changes at NOAA, USCG, and FWS may delay the reviews and approvals of MITT changes.</li> <li>Question on whether the rescinding of certain Air Force NEPA regulations in 2025 will affect the current MITT NEPA process or future public involvement.</li> <li>Future Guam Civil-Military Coordinating Council discussions regarding the SEIS should be made publicly available.</li> <li>Local environmental agencies should be included as cooperating or participating parties.</li> <li>Expansion of federal operational flexibility reduces transparency and meaningful project-specific scrutiny.</li> <li>A new programmatic EIS should be required.</li> </ul> |
| Other Regulations and Laws          | <ul style="list-style-type: none"> <li>A required Coastal Zone Management Act consistency determination must be submitted for GovGuam review.</li> <li>Question on the status of the Navy's adaptive management commitments under the 2020 Biological Opinion.</li> <li>Concern regarding alleged failure to demonstrate consistency with CNMI Constitutional Standards.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Other                               | <ul style="list-style-type: none"> <li>Military treats Guam and CNMI as colonial possessions and are poor stewards of the environment.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

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| Other (cont'd)      | <ul style="list-style-type: none"> <li>• Question on which firefighting foam is currently being used in training exercises in the MITT Study Area and whether it is fluorine-free.</li> <li>• Question on how long the lease of FDM will run and how much money the CNMI government received for it.</li> <li>• MITT plans should better address impacts of changing weather patterns, such as more powerful typhoons.</li> <li>• Changes in the status of the Marianas Trench Marine National Monument in and near training should be addressed.</li> <li>• Invasive species and ballast/bilge-mediated transport pathways are omitted as environmental stressors.</li> <li>• SEIS fails to provide a port-focused operational risk model or integrate capital project schedules for Apra Harbor.</li> <li>• Waste management analysis is inadequate on the total tonnage of expended materials disposed of at sea and on land.</li> </ul> |

**Notes:** BOEM = Bureau of Ocean Energy Management, CNMI = Commonwealth of the Northern Mariana Islands, DNL = day-night average sound level, ESA = Endangered Species Act, FAA = Federal Aviation Administration, FDM = Farallon de Medinilla, GovGuam = Government of Guam, MITT = Mariana Islands Training and Testing, NAEMO = Navy Acoustic Effects Model, NEPA = National Environmental Policy Act, NHPA = National Historic Preservation Act, NMFS = National Marine Fisheries Service, NOAA = National Oceanic and Atmospheric Administration, SEIS = EIS/OEIS = Supplemental Environmental Impact Statement/Overseas Environmental Impact Statement, Sonar = Sound Navigation and Ranging, SURTASS-LFAS-TT = Surveillance Towed Array Sensor System Low Frequency Active Ship Training and Testing, UAS = Unmanned Aerial Systems, USCG = United States Coast Guard, USV = Unmanned Surface Vessels.