Draft Environmental Impact Statement

Infrastructure Improvements at the Yap International Airport and the Yap Seaport

Yap State, Federated States of Micronesia

ID# EISX-007-USN-1775813621

APRIL 2026

Appendix B
EIS Scoping Comments and Responses

#	Source	Commenter Name	Comment	Response
1	Scoping Meeting (Oral)	Name not provided	After the completion of the proposed improvements, how often will there be port calls and exercises? What will exercises entail?	Airport: Up to 2 two-week exercises per year involving a range of aircraft and closely coordinated with Yap State government well in advance (in addition to routine military aircraft passing through) Seaport: up to one exercise per year which will generally occur during an airport exercise, in addition vessels within the area may make routine port calls which will be coordinated with the FSM and Yap State Governements. Exercises are typically planned about a year in advance and in coordination Yap State government. Exercises will take many forms. The Pacific Partnership program is one example where the Navy sends teams for medical engagements, construction projects, disaster preparedness training and other community engagements. Another example would be practice scenarios like the expeditious repair of vessels – flying in parts, equipment, and personnel to execute repairs quickly at the port. Another example would be to test logistics capabilities, like drinking water from ship to shore.
2	Scoping Meeting (Oral)	Leevin Camacho	What alternatives will be considered in the EIS? Only preferred alternative and no action? What about project variation (like removing taxiway, etc.)? Have you looked at other sites and locations? Why Yap and not some other location?	The EIS will analyze alternatives that best fulfill the project's purpose and need while also considering the needs of the environment and the community. The US Team is currently developing alternatives that meet the purpose and need of the project and incorporate the comments we receive at the public scoping meetings. The EIS will also explain alternatives considered but not carried forward because they do not fulfill the project's purpose and need.
3	Scoping Meeting (Oral)	Leevin Camacho	Need to tie the purpose and need to the alternatives considered in the EA. What are the ships/aircraft/operational considerations that are driving the design requirements?	The EIS will have a fully developed Proposed Action and Purpose and Need section that will be tied to the alternatives carried forward for analysis. The overall scope of types of ships, aircrafts and operational considerations will be included in the EIS.
4	Scoping Meeting (Oral)	Julie Hartup; D'amy Steward	How deep will the silt curtains go? Full, partial length?	The project designs are still being developed. In general, silt curtains help the water clear up faster and reduce the spread of silt. They work best when they hang a few meters down, pushing the stilt downwards so it settles quickly. Trying to make the curtains reach the bottom of the water can cause damage to the seabed and make them too weak to handle the water's force. Therefore, they are designed to float and only go partway down.
5	Scoping Meeting (Oral)	Julie Hartup; D'amy Steward	Will turbidity monitoring devices only be placed at the surface? Or will they be placed at multiple depths?	The project designs are still being developed. In general, turbidity monitors are typically installed below a floating buoy and sit approximately one to two meters below the surface. Turbidity monitors typically monitor at a single depth, but additional monitors at varying depths may be provided if installed if the EIS analysis indicates high impact.
6	Scoping Meeting (Oral)	Kathe Burch	Would widening at the channel entrance affect currents, sediment flow, sedimentation, or erosion in the German channel (several miles away)?	Coastal engineers have determined that there is not a direct path from the area where the channel is to be widened to the entrance to the German Channel. Waves that past through the channel after dredging will be knocked down by the time it reaches the German Channel. Furthermore, the EIS will analyze the potential impacts of the project on environmental resources including potential for sedimentation and its effects.

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7	Scoping Meeting (Oral)	Name not provided	Could widening at the channel entrance increase ocean energy forces/erosion rates at the shoreline (two miles away) causing erosion? – particularly during major storms? (waves overtopped Ganir bridge during Hurricane Sudal in 2004)	Widening the harbor entrance will not make waves stronger or cause more erosion at the shoreline near Ganir Bridge, even during big storms. The amount of water flowing in and out of the harbor with the tide is already large, so the widening will not be a noticeable difference.
8	Scoping Meeting (Oral)	Name not provided	Will the hydrodynamic model consider climate change (e.g., stronger storms), and sea level rise? And what sea level rise scenarios will be considered? Was there consideration of elevating the wharf deck similar to what was considered for Malakal? What about roadway elevations including the causeway at the west crossing of Chamorro Bay? What is estimated SLR?	Your comment is important and will be considered while developing the draft EIS. The coastal modeling considers various water levels, including future sea level rise, and seasonal fluctuations such as El Niño and La Niña. The hydrodynamic plume dispersion model considers present day conditions only noting that dredging activities are proposed to be undertaken in the near future. The Basis of Design adopts 1.99' of Sea Level Rise (SLR) for calculation of the deck elevation (Extreme High Water (HAT) + SLR + air gap (1 ft) + deck thickness. = 9.53' MLLW. Multiple SLR scenarios were considered. Yes. The deck elevation for the new wharf extension was set at 9.53' MLLW to accommodate SLR. Existing wharf deck elevation will not change as part of this project. Current port operations will not be impacted. The existing roadways were designed to tie into adjacent grades and thus do not directly account for SLR. The causeway roadway improvements are being designed at an elevation higher than the 100-yr storm event + 50-year SLR to address current flooding concerns. The increase in roadway elevation will alleviate coastal flooding from the Chamorro Bay side of the causeway and from increased water levels in the lagoon (caused by the tidal equilibrium through the causeway culvert). SLR will be considered to the maximum extent practicable while conforming to tie ins at each end of the improved area.
9	Scoping Meeting (Oral)	Name not provided	What controls will vessels entering the lagoon have on ballast, oily waste and sewer discharges?	The DoD is coordinating with the FSM Government and the Yap State Government on the necessary applicable protocols and will comply with substantive standards of the US Clean Water Act.
10	Scoping Meeting (Oral)	Name not provided	How will fish and coral species that spawn in the lagoon and intertidal habitats be taken into consideration?	Construction will be scheduled to avoid in-water activities during coral spawning seasons and will also be scheduled to avoid important identified fish spawning periods to the extent practicable.
11	Scoping Meeting (Oral)	Name not provided	Many families rely of marine species harvested from the lagoon for sustenance – how will impact to that be analyzed? (under socio economics if species are not conserved protected)	The purpose of the EIS is to analyze the impacts of the proposed action including impacts to marine resources and socioeconomic issues. Marine and socioeconomic studies will inform the EIS on the potential impacts to subsistence fishing.

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12	Scoping Meeting (Oral)	Name not provided	What is the design plan for the airport drainage and how will the design address runoff and sedimentation? During heavy rains, the runoff from the airport pushes sediment into the taro patches and mangroves.	The airport drainage design includes multiple detention ponds to manage additional stormwater generated from the increased impervious surface proposed at the airport (e.g., runway extensions, taxiway, apron, etc.). The detention ponds would increase groundwater recharge and control sedimentation. The EIS will analyze the impacts of the proposed action and may include additional Best Management Practices .
13	Scoping Meeting (Oral)	Name not provided	Groundwater underlying the airfield is an important source of drinking water – what controls are proposed to ensure its protection?	The EIS will analyze any impacts to drinking water and provide applicable Best Management Practices , SOPs, or mitigations, if needed, to avoid or minimize adverse impacts to drinking water. The EIS will comply with standards substantively similar to those required of the Clean Water Act.
14	Scoping Meeting (Oral)	Name not provided	Has a noise study been completed? Will it include fighter jets and potential exposure to noise sensitive land uses? Will the study comply with FAA requirements?	A noise study will be prepared as part of the EIS and will analyze relevant aircraft and construction noise impacts.
15	Scoping Meeting (Oral)	Shankarah Lessey	What are the protocols to prevent the spread of invasive species during construction and operations. Need to ensure that materials shipped to Yap do not contain invasive species? Need to specify in the construction contracting documents that the contractor shall test materials at their source destination prior to shipping to Yap. This can be a costly process and contractors may try to avoid it if not explicitly required.	The DoD is coordinating with the FSM Government and the Yap State Government on the necessary biosecurity protocols. The construction contract will include explicit requirements to prevent the introduction and spread of invasive species. The specification would also explicitly require testing and inspection of materials at their source destination prior to shipment to Yap. These provisions are enforceable and make it clear that testing and inspection at the source is not optional. This is important because, as you noted, contractors may attempt to avoid this step unless it is explicitly required. Details on the biosecurity protocols would be specified in the contract and discussed as part of the EIS analysis.
16	Scoping Meeting (Oral)	Kathe Burch	How will regions of influence be established in the EIS?	Regions of influence or areas of potential affect will be evaluated separately for different media following USEPA guidance and other best practices in the same way they are evaluated in the United States.
17	Scoping Meeting (Oral)	Stefan Krause	Has the COP been consulted?	Coordination with COP is managed by the Yap-US Operations Military Operations task force. Standard protocol does not permit US direct coordination with COP, however members of the COP have been present at some project briefings and are aware of the proposed projects.

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18	Scoping Meeting (Oral)	Stefan Krause	Yap State Task Force will propose a Section 106-like process to follow (e.g., MOA)? Need to track how will this be implemented. (The comment in the Yap EPA mtg was: Is it possible to consider following a Section 106/MOA process?) Gail - HPO mtg (held after EPA mtg) resolved that the YSTF would provide the initial framework for DOD consideration ("within a week or two...")	Section 402 of the National Historic Preservation Act is applicable to Department of Defense activities outside the United States. Section 402 directs DoD to take into account the effects of its undertakings on properties listed in, or eligible for, the host nation's equivalent of the National Register of Historic Places, for the purposes of avoiding or mitigating any adverse effects. The YUMO task force and the US have agreed to develop a Section 106-like consultation framework. This SOP will document consultation procedures amendable to the US and YUMO task force. Additionally, the EIS will include a socioeconomic study, including setting up interviews with Yapese communities and traditional leaders, if available, to understand and assess potential impacts to traditional, cultural, and subsistence resources.
19	Scoping Meeting (Oral)	Kathe Burch	Have families of buried ancestors been notified of the proposed action?	Coordination with individual landowners is managed by Yap-US Operations Military Operations task force. Standard protocol does not currently permit US direct coordination with individual landowners, however the US has solicited input from landowners during public design and scoping meetings. The US has also requested that the YUMA task force identify landowners and inform families that would be potentially impacted. At this stage, it is not clear whether all families or members of the public with ties to the graves are aware of the proposed project for the Airport and Seaport but efforts are underway to expand awareness. Because this concern is an important aspect of the cultural and community review process, we request that members of the public from all municipalities, especially those that may be affected, provide input and guidance on this matter during the public scoping meetings. In addition, we expect that impacted communities will be contacted through the standard operating procedures (SOP) being developed in coordination with the YUMO task force as the US implements Section 402 of the Historic Preservation Act, Title 54 USC § 307101(e).
20	Scoping Meeting (Oral)	Name not provided	There are a lot of coral and life around the current ATONS. Will channel markers be removed at the surface or entirely removed? What will be the impacts to coral?	Current plan is to minimize impacts to benthic environment and remove any hazards to navigation. Specifics of the design plans are still being developed, but the process may include placing the new ATON next to the existing ATON and cutting the existing ATON off at its foundation block (leaving foundation block in place) or in situations where foundations have no benthic growth, lift the existing foundation onto an adjacent barge and replace it with a new ATON (within the same footprint). Impacts to coral should be minimal except in several locations where coral has encrusted the foundations (like the outer channel markers). These situations will require consultation to minimize coral loss.

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21	Scoping Meeting (Oral)	Name not provided	Will the roadway improvements be asphalt or concrete? Yap prefers concrete roadways.	The project was developed and funding was programmed based on repairs to improve the existing asphalt road, the project does not include funding for new concrete roads and any significant use of concrete would require use of limited mitigation funds, decreasing capability for other mitigations. At this point, the US believes that asphalt remains appropriate for most areas although there may be some areas where concrete could be appropriate. The advantages of asphalt is that it is faster to install and repair than concrete, allowing for quicker reopening to traffic. Asphalt minimizes the risk of disrupting underground utilities due to its thinner layer, and it's easier to maintain with existing local repair practices. Asphalt is also more flexible for use in variable soil conditions and easier to dig up and repair, particularly where underground utilities require maintenance. As a result in most areas the US believes that asphalt is the most practical and cost-effective solution.
22	Scoping Meeting (Oral)	Name not provided	How much contaminated soils/material will be generated from the construction process?	Details of the proposed action are still being developed. The EIS would analyze impacts of the proposed action on resources including the generation of hazardous waste and materials and the proper protocol for disposal per applicable regulations. The EIS will comply with standards substantively similar to those required for the US Solid Waste Disposal Act and the Toxic Substances Control Act.
23	Scoping Meeting (Oral)	Name not provided	How will contaminated soils/material be handled?	Details of the proposed action are still being developed. The EIS would analyze impacts of the proposed action on resources including the generation of hazardous waste and materials and the proper protocol for disposal per applicable regulations. The EIS will comply with standards substantively similar to those required for the US Solid Waste Disposal Act and the Toxic Substances Control Act.
24	Scoping Meeting (Oral)	Name not provided	What utility improvements are included at the wharf and where will the points of connection be?	Design plans are still being developed. Utilities at the new wharf extension and existing wharf improvements are planned to match existing utility conditions. Wharf improvements would include new high mast lighting to support port operation. There will also be new hose bibs at the hose down area that will be constructed as part of the project. All other existing systems if impacted by construction will be replaced in kind. The proposed action would not include upgrades to shoreside utilities.
25	Scoping Meeting (Oral)	Kathe Burch	Request that an independent study be conducted to evaluate impacts to site drainage and mangroves.	The EIS will analyze the impacts of the proposed action on resources including marine, wetland, mangroves, and water resources using best available information; The EIS will also analyze potential Best Management Practices , SOPs, or mitigations, if required, to avoid and minimize adverse impacts to the resource based on best available information. The US will consider any relevant studies that are provided to our team.

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26	Scoping Meeting (Oral)	Name not provided	The proposed Life Support Area and construction staging is located across the road from the airfield. Will this create safety and congestion issues on the roadway? What will be done to minimize impacts? What about alternate site NE of airfield?	The location of the Life Support Area has not been finalized. Furthermore, the EIS would analyze impacts of the proposed action on resources including impacts to Public Health & Safety, conduct a Traffic Study and would include potential Best Management Practices, SOPS, and mitigations, if required, to avoid or minimize adverse impacts to public health and safety and traffic congestion.
27	Scoping Meeting (Oral)	Name not provided	The presented plan does not have any provisions for airplane sewage disposal. Does the airfield need wastewater treatment facilities?	Unlike commercial flights, military airplanes do not generally generate large amounts of sewage and are generally capable of transporting any sewage back to their point of origin or another airport with sewage facilities; therefore provisions for airplane sewage disposal are not required to support proposed action. Specifics on the proposed action is still being developed including all the utilities that may be required. The construction of the airport improvements does not affect the current terminal utilities which will remain unchanged. Any worker housing are regardless of its final location, would be required to meet sanitary requirements of Yap.
28	Scoping Meeting (Oral)	Name not provided	Will the airport remain open during construction? How will the construction phasing work to avoid/minimize impacts to commercial activities?	The DoD Team will be presenting recommended courses of action regarding work schedules of the project during the September EIS Public Scoping meeting with Yap officials; the US will work to minimize impacts to commercial activities to the maximum extent practicable.
29	Scoping Meeting (Oral)	Name not provided	Are there plans for a project website?	Yes, the DoD is developing a project website for information sharing and public input. We aim to launch it by mid-November and are establishing an interim site in the meantime.
30	Scoping Meeting (Oral)	Name not provided	Who performs and/or pays for maintenance?	The US will work with the FSM and Yap State to develop an appropriate approach to maintenance of new and expanded facilities. Designation as Joint Use Defense Sites may allow the US to contribute toward joint maintenance costs. The US will provide maintenance for Exclusive Use Defense Sites.
31	Scoping Meeting (Oral)	Name not provided	The DoD Team and local officials continue to work through space and boundary topics.	Details of the proposed action are still being developed. The DoD Team and local officials, landowners, and traditional leaders continue to work through and coordinate on space and boundary topics.

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32	Scoping Meeting (Oral)	Name not provided	The following protocol for surveys must be followed: a. At least 30 days from survey commencement, submit Dipnote to FSM National (with cc to YSTF) requesting conceptual approval of proposed surveys (this will also give FSM National personnel advance notice to arrange flights to Yap to be onsite during the surveys). b. At least two weeks prior to field work, submit a follow-on Dipnote providing details of the surveys (e.g., scope/purpose, duration, geographic extents and personnel) to FSM National with cc to YSTF. c. Before commencing field work, provide an in brief to YSTF and affected communities (as directed by YSTF) of survey scope/purpose, duration, geographic extents and personnel.	The substantive information outlined in the survey protocol by the Yap State Historic Preservation Office will be followed for all future survey notifications and coordination. These steps will be followed to ensure timely communication with FSM National, the Yap State Task Force, and affected communities, and to support the presence of FSM personnel during surveys where possible.
33	Scoping Meeting (Oral)	Name not provided	If the cumulative impacts ROI extends beyond Rull and Tamil, other municipalities should be consulted.	Details of the proposed action, proposed action location, and region of influence are still being developed. Input is welcomed from any municipalities that believes it is within a potentially impacted area.
34	Scoping Meeting (Oral)	Name not provided	Valuable plants should be made available to the Yap community during land clearing efforts. Local students could be trained to do the identification.	Your comments is greatly appreciated, and will be relayed to the appropriate DoD entity for consideration as potential mitigation measures.
35	Scoping Meeting (Oral)	Name not provided	Material from land clearing could be composted for use by Yap residents. Will composting be pursued to manage green waste?	The DoD will coordinate with the Yap Division of Agriculture and Forestry on green waste management strategies. The purpose of the EIS process is to analyze the impacts of the proposed action on environmental resources and include best management practices, SOPS, or mitigations, if needed, to avoid or minimize adverse impacts. Examples may include protocols to reduce the risk of green waste and compost vectoring invasive species, if applicable.
36	Scoping Meeting (Oral)	Name not provided	Describe dredged material offloading requirements at the Tamil site (barge capacity and draft, truck loads, etc.), including visuals.	Details of the proposed action are still being developed and will be included in the EIS. The EIS will analyze the impacts of the proposed dredge work including the offloading requirements and include potential Best Management Practices, SOPs, or mitigations, if required, to avoid or minimize adverse impacts.

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37	Scoping Meeting (Written)	Stefan Krause	You really need to have a more focused review of the cultural impacts of this. Even if S. 106 is not required by law, there is no other place I can think it would be needed as much as it is here for this project. The traditional chiefs of Papi and Rul have not even been consulted, and Yap doesn't have NAGPRA protections so that makes it even more important. I think you really want to do it correctly and respect traditions and custom, but there is so much you do not know about that needs to be addressed. Archaeological knowledge is good, but cultural knowledge of important protocols is lacking tremendously.	The National Historic Preservation Act, Title 54 USC § 307101(e) [formerly known as Section 402], is applicable to Department of Defense activities outside the United States. This provision directs DoD to take into account the effects of its undertakings on properties listed in, or eligible for, the host nation's equivalent of the National Register of Historic Places. The identification of appropriate stakeholders to coordinate and consult with for this project is one of the first steps prior to identifying cultural resources. For this project, consultation will be conducted with the Yap Historic Preservation Office, the FSM State Historic Preservation Office, and other stakeholders identified during the scoping process that includes traditional leaders, and affected communities. We recognize that archaeological studies alone cannot fully capture cultural impacts as this is only one type of study to identify a specific type of cultural resources. We agree that cultural knowledge, protocols, and traditions are essential to understanding and respecting heritage in Yap. However, prior to this engagement we need to ensure that coordination and outreach follows appropriate communication protocols. We are working on those protocols with the Yap State Task Force and also will consider suggestions submitted at the scoping meetings as well as other meetings. Our intent is to conduct consultations with those that may be affected by this proposed project such as community leaders, cultural practitioners, and residents who are an important part of this process.
38	Scoping Meeting (Written)	Ashley Meredith	Have a cultural impact assessment. A heritage impact assessment. Ask the people. Go to the communities. They're connected so don't just go to the ones nearest to the site. Consider core, suffer, and transition communities. There's history in the water, mangroves, fishes, they impact the cultural system.	The EIS will consider both cultural and heritage impacts as part of its analysis, consistent with the requirements of the National Historic Preservation Act, Title 54 USC § 307101(e) [formerly known as Section 402], and related consultation processes. A key part of this effort will be community engagement, which will not be limited to those living nearest the project as the area of potential effect looks at a variety of factors not just direct impacts but also includes indirect effects that recognize the broader cultural and social connections across Yap. The EIS will consider the broader cultural impacts of the projects as a whole. The input and comments provided by communities during these public scoping meetings are especially important, as they help ensure that cultural, historical, and heritage concerns are identified early and addressed in the EIS.

#	Source	Commenter Name	Comment	Response
39	Email Comments	Bill Cords	Dear EIS Project Manager, I am writing to submit my personal comments for the scoping process of the Environmental Impact Statement (EIS) for the proposed infrastructure improvements at Yap International Airport and Yap Seaport. As a concerned stakeholder with familial ties through marriage and an almost 40-year relationship with the Yapese community, I recommend that the Department of Defense consider prioritizing the protection of coral reefs, marine habitats, terrestrial resources, and cultural assets, while evaluating the socio-economic impacts of the project and conducting a thorough, environmentally sensitive assessment of effects from overall construction, operations, dredging, and dredge material disposal activities in Yap State. Given Yap's unique and sensitive ecological and cultural heritage-including its vibrant coral reefs, diverse marine ecosystems, essential terrestrial resources, ancient stone structures, and traditional cultural practices-these irreplaceable assets could be safeguarded with careful attention to potential project impacts. Yap, a small island of approximately 38 square miles surrounded by fringing coral reefs and rich fishing habitats, is particularly vulnerable, so a comprehensive analysis of construction-related effects on reefs, marine habitats, and terrestrial resources would be valuable. Furthermore, I highlight the importance of robust community input and local traditional leadership perspectives to help preserve Yap's sensitive environmental ecosystems and rich cultural traditions, ensuring the project integrates these elements into a sustainable, modern framework while respecting its unique heritage customs and traditions. I also suggest that the DoD's execution of this project-including contracting and resource planning, as informed by the EIS scope-could incorporate socio-economic considerations that considers the host Yap in project participation through local employment and contracting opportunities, minimizing over-reliance on foreign labor and foreign companies to the degree practicable; and aligning project development	Thank you for submitting your comments. They will be considered during the preparation of the Draft EIS.

#	Source	Commenter Name	Comment	Response
40	Email Comments	Bill Cords	1. How might the EIS assess impacts on marine resources, coral reefs, mangroves, seagrass beds, traditional fishing areas, manta cleaning stations, and other marine habitats from construction, dredging, disposal, and changes in water circulation or coastal erosion?	The EIS will analyze any impacts to marine resources which would include evaluating impacts against baseline conditions and include relevant Best Management Practices , SOPs, or mitigations, if required, to avoid or minimize adverse impacts. Best Management Practice may include the use of silt curtains, turbidity monitoring, coral translocation, etc. The DoD has conducted marine resources baseline surveys and is conducting a dredge plume modeling study to determine potential impacts.
41	Email Comments	Bill Cords	2. What studies could assess noise, vibration, and light pollution impacts from construction and operations on marine species (e.g., fish, sea turtles, marine mammals)?	The DoD has completed an underwater acoustic analysis for potential noise and vibration impacts from dredging and pile driving to marine species. Potential impacts from light pollution are typically managed through avoidance and minimization measures (e.g., use of shielded lighting when necessary, etc.). Avoidance and minimization measures will be assessed in the Draft EIS.
42	Email Comments	Bill Cords	3. How could cumulative impacts from port and airport activities, including chemical pollution and physical disturbances, be evaluated?	Per current DoD NEPA Implementing Procedures dated June 30, 2025, cumulative impacts of different projects are no longer considered in environmental reviews. However, the EIS will continue to evaluate the impacts of the entire proposed action that encompass both the airport and seaport actions on environmental resources. Appropriate Best Management Practices , SOPs, or mitigation measures, if required, would be included to avoid or minimize adverse impacts to applicable resources.
43	Email Comments	Bill Cords	Scope Recommendations for Ocean Habitat Protection: I suggest conducting a comprehensive marine habitat survey to map fishing grounds, reefs, mangroves, seagrass beds, and their ecological roles. It would be helpful to analyze effects on fishing grounds, including spawning and migration patterns, and to include mitigation options such as buffer zones, stormwater management, and timing restrictions to avoid breeding seasons.	The EIS will analyze impacts to marine resources which will include evaluating impacts against baseline conditions. Relevant Best Management Practices, SOPs, or mitigations, if required, to avoid or minimize adverse impacts will be identified and assessed. Best Management Practices may include the use of silt curtains, turbidity monitoring, scheduling activities to avoid spawning season for certain fish species, etc. The DoD has conducted marine resources baseline surveys and is conducting a dredge plume modeling study to determine potential impacts.
44	Email Comments	Bill Cords	4. How might construction, dredging, and dredge material disposal at the Yap Seaport, Airport, and associated roadwork affect coral reef ecosystems, including direct (e.g., sediment runoff, dredging) and indirect impacts (e.g., turbidity, nutrient loading)?	The EIS will analyze impacts to coral reef ecosystems which will include evaluating impacts against baseline conditions. Relevant Best Management Practices, SOPs, or mitigations, if required, to avoid or minimize adverse impacts will be identified and assessed. Best Management Practices may include the use of silt curtains, turbidity monitoring, scheduling activities to avoid spawning season for certain coral species, etc. The DoD has conducted marine resources baseline surveys and is conducting a dredge plume modeling study to determine potential impacts.
45	Email Comments	Bill Cords	5. What baseline studies could assess the current health, biodiversity, and resilience of these coral reefs, and how might they inform impact assessments?	Baseline surveys completed by the DoD included 1) marine habitat mapping, 2) benthic/biotic surveys, 3) ecotourism investigation, and 4) remote sensing. The baseline surveys will help to establish the existing environmental conditions for marine resources against which potential impacts from the action alternatives will be assessed.

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46	Email Comments	Bill Cords	6. What mitigation measures (e.g., silt curtains, coral relocation, reef restoration) could be proposed to minimize harm during and after construction, including from increased vessel traffic or potential fuel spills?	Avoidance and minimization measures may include use of silt curtains, turbidity monitoring, biological monitoring, and coral relocation. Measures will be identified and addressed in the Draft EIS. Where impacts are unable to be avoided or minimized, the EIS will recommend mitigation measures.
47	Email Comments	Bill Cords	Scope Recommendations for Reef Protection and Preservation: I recommend including a baseline study of coral reef health (species diversity, coverage, resilience) in potentially affected areas. Using hydrodynamic modeling to predict sediment dispersal from construction and disposal could be beneficial. It would also be useful to incorporate mitigation measures like coral restoration and long-term monitoring plans.	The EIS will analyze impacts to coral reefs which will include evaluating impacts against baseline conditions. Relevant Best Management Practices, SOPs, or mitigations, if required, to avoid or minimize adverse impacts will be identified and assessed. Best Management Practices may include the use of silt curtains, turbidity monitoring, scheduling activities to avoid spawning season for certain coral species, etc. The DoD has conducted marine resources baseline surveys and is conducting a dredge plume modeling study to determine potential impacts.
48	Email Comments	Bill Cords	7. What studies could assess impacts of ocean disposal on marine habitats (e.g., reefs, seagrass, mangroves), including sediment plumes, turbidity, water quality changes, and contamination risks?	Currently, ocean disposal of dredged material is not part of the preferred action. A dredge plume modeling study is being conducted to evaluate potential turbidity and sediment deposition rates associated with the proposed in-water dredging and dredge material placement. The results of the study will be used to access impacts to marine habitats.
49	Email Comments	Bill Cords	8. Could the EIS include modeling of dredge material dispersal and evaluate long-term ecological consequences, such as effects on benthic communities or fish populations?	A dredge plume modeling study is being conducted to evaluate potential turbidity and sediment deposition rates associated with the proposed in-water dredging and dredge material placement. The results of the study will be used to access impacts in the Draft EIS.
50	Email Comments	Bill Cords	9. Could the EIS compare ocean vs. land-based disposal impacts, including hybrid approaches, and use criteria that prioritize ecosystem and cultural protection?	Yap landowners and traditional leaders have indicated a preference for land reclamation and land-based disposal of dredge material which will be carried forward for detailed analysis in the Draft EIS. The Draft EIS will also include a comparison of all alternatives considered for the Proposed Action, including alternatives that may have been considered and not carried forward (e.g., ocean dredge disposal).
51	Email Comments	Bill Cords	10. How might beneficial reuse options for dredge materials (e.g., beach nourishment, wetland restoration, land reclamation for sea-level rise adaptation, or reuse in construction) be evaluated and prioritized to minimize ocean disposal needs and environmental impacts?	Yap landowners and traditional leaders have indicated a preference for land reclamation and land-based disposal of dredge material which will be carried forward for detailed analysis in the Draft EIS. The Draft EIS will also include a comparison of all alternatives considered for the Proposed Action, including alternatives that may have been considered and not carried forward (e.g., ocean dredge disposal).
52	Email Comments	Bill Cords	11. Where might land-based disposal sites be located, and how could impacts on terrestrial ecosystems, runoff to waterways, cultural sites, and community access be assessed?	Land-reclamation and stockpiling sites have been proposed in Rull, Weloy (Port Peninsula), and Tamil. The DoD is working closely with each of these communities on the conceptual design of these dredge material reuse areas and they will be evaluated in detail in the Draft EIS.

#	Source	Commenter Name	Comment	Response
53	Email Comments	Bill Cords	12. What measures could prevent erosion, leaching, or disruptions from land-based sites, especially during storms that might affect land resources, taro patches, and traditional sites?	Best Management Practices (i.e. swales, berms, linings, waddles, etc.) for prevention of erosion and runoff at these sites will be evaluated in the Draft EIS.
54	Email Comments	Bill Cords	13. How might community input and traditional ecological knowledge guide disposal options, particularly for fishing areas and cultural sites?	Yap landowners and traditional leaders have indicated a preference for land reclamation and land-based disposal of dredge material which will be carried forward for detailed analysis in the Draft EIS. The Draft EIS will also include a comparison of all alternatives considered for the Proposed Action, including alternatives that may have been considered and not carried forward (e.g., ocean dredge disposal).
55	Email Comments	Bill Cords	Scope Recommendations for Evaluation of Dredge Material Disposal Options: I suggest requiring baseline surveys of ecosystems in disposal sites and hydrodynamic modeling to avoid sensitive areas. Mandating testing of materials and prioritizing reuse for resilience (e.g., erosion control) could be helpful. Outlining mitigation like silt curtains and monitoring for recovery while incorporating community knowledge, would enhance the process.	Your comments are greatly appreciated and will be considered while developing the Draft EIS. The EIS will fully evaluate the impacts of the proposed action on environmental resources including conducting baseline surveys, Best Management Practices, SOPs, or mitigations, if required, to avoid or minimize adverse impacts.
56	Email Comments	Bill Cords	14. What mitigation measures could minimize impacts of ocean and land-based disposal on reefs, habitats, fishing areas, diving sites, water quality, cultural sites, and community access, and how might their effectiveness be monitored?	Relevant Best Management Practices, SOPs, or mitigations, if required, to avoid or minimize adverse impacts will be identified and assessed in the EIS. Avoidance and minimization measures may include the use of silt curtains, turbidity monitoring, scheduling activities to avoid spawning season for certain fish or coral species, and the use of erosion control methods.
57	Email Comments	Bill Cords	15. Could the EIS include a long-term monitoring plan for environmental and cultural impacts, including ecosystem recovery?	The EIS will analyze impacts of the proposed action on environmental and cultural resources and include applicable Best Management Practices , SOPs, or mitigation measures, if required, to avoid or minimize adverse impacts. Potential mitigation measures such as long-term monitoring plans will be identified and evaluated in the EIS.
58	Email Comments	Bill Cords	Scope Recommendations for Mitigation and Monitoring for Disposal Activities: I propose developing detailed mitigation plans (e.g., sediment barriers, timing restrictions, restoration). Establishing monitoring with metrics, public reporting, and involvement from the Yap Marine Resources Management Division would be valuable.	Land-reclamation and stockpiling sites for dredge material have been proposed in Rull, Weloy (Port Peninsula), and Tamil. The DoD is working closely with each of these communities on the conceptual design of these dredge material reuse areas and they will be evaluated in detail in the Draft EIS. Potential Best Management Practices (swales, berms, linings, waddles, etc.) for prevention of erosion and runoff at these sites will be evaluated in the Draft EIS.

#	Source	Commenter Name	Comment	Response
59	Email Comments	Bill Cords	16. How might the EIS identify and assess impacts on culturally significant sites (e.g., sacred areas, archaeological resources) and traditional practices (e.g., fishing, taro cultivation, ceremonies) from project activities or increased military presence?	As part of the EIS process, your knowledge and comments make sure that a variety of cultural resources are properly considered. That's why your input is so important--especially from families and municipalities that may be directly affected. Please share with us what you know about areas or practices that should be looked at during this scoping process. Additionally, the EIS will include a socioeconomic study, including setting up interviews with Yapese communities and traditional leaders, if available, to understand and assess potential impacts to traditional, and cultural resources.
60	Email Comments	Bill Cords	17. What consultation processes could engage Yapese communities, traditional leaders, and cultural practitioners to incorporate their perspectives and preserve intangible heritage like marine resource management knowledge?	Specifics on the consultation processes that will be used to engage Yapese communities, traditional leaders, and cultural practitioners is still being developed as we want to first establish appropriate cultural communication protocols. The EIS process is designed to gather community knowledge and perspectives, and input from the public will help shape how consultations move forward. Because the preservation of intangible heritage such as marine resource management practices is an important concern, we request that members of the public from all municipalities, especially those that would be affected, provide guidance on consultation approaches during the public scoping meetings.
61	Email Comments	Bill Cords	18. How might the project protect, or document cultural resources disturbed by activities, including ecosystem changes?	The specific measures to protect or document cultural resources are dependent upon consultation with affected stakeholders. The consultation process will evaluate a range of strategies, including avoidance, buffer zones, and documentation methods such as mapping and photography, developed in consultation with the Yap Historic Preservation Office, traditional leaders, and communities. The area of potential effect for the projects requiring consultation includes areas where project induced ecosystem changes—such as alterations to mangroves, streams, or marine environments—may affect cultural resources, and how protection and documentation measures should respond to those changes. Clear procedures, including stop-work protocols if cultural resources are uncovered during construction, will be included. Community input is critical to shaping these strategies, and families and municipalities that may be affected are encouraged to share their knowledge and recommendations during the scoping process.

#	Source	Commenter Name	Comment	Response
62	Email Comments	Bill Cords	Scope Recommendations for Cultural and Historic Resources: I suggest conducting a cultural resource inventory with the Yap State Historic Preservation Office and local communities, integrating traditional knowledge via ethnographic studies on land/sea uses. Ensuring robust engagement, including meetings in Yapese, and proposing mitigation like site avoidance if possible or documentation and preservation would be beneficial.	This recommendation is noted and is consistent with the goals of the EIS process. Conducting inventories in coordination with the Yap State Historic Preservation Office and local communities, integrating traditional knowledge, and ensuring meaningful engagement are important considerations in the EIS process. Input from the public, including recommendations such as this, will help shape the scope of analysis and identify appropriate approaches for avoidance, documentation, or preservation measures. We encourage continued guidance from all municipalities, especially those that may be affected, during the public scoping meetings.
63	Email Comments	Bill Cords	20. How might the EIS evaluate socio-economic impacts of using foreign labor, including displacement of local workers, economic leakage, housing strains, and reduced community benefits, and assess effects of housing foreign labor on local resources in Yap's limited area?	The DoD will be conducting a socioeconomic study to establish baseline conditions and evaluate potential impacts of the proposed project on socioeconomic resources such as housing, economic activity, and public services. The results of the study will be used to inform the analysis of impacts on socioeconomic resources in the EIS and provide applicable Best Management Practices, SOPs, or mitigations, if needed, to avoid or minimize adverse impacts to socioeconomic resources and the Yap economy. Additionally, the current proposed project includes identification of a potential area for construction of workforce housing to minimize potential impacts to the existing Yapese housing market.
64	Email Comments	Bill Cords	21. Given outmigration of Yapese-including skilled tradespeople-to Guam, Hawaii, and the U.S. mainland due to limited economic opportunities, what plans could the EIS outline for prioritizing local labor (including those trained under Navy Civil Action Technical Training Program and U.S. Job Corps Programs with multi-decade efforts by the US to support Yapese, acquiring skills in trades support on-island economic benefits?	The DoD will comply with Article IV of the Status of Forces Agreement with the FSM which requires contractors to utilize qualified local labor and contractors to the maximum extent feasible. Further, The EIS will analyze any impacts to socioeconomics and provide applicable Best Management Practices, SOPs, or mitigations, if needed, to avoid or minimize adverse impacts to the Yap economy.
65	Email Comments	Bill Cords	22. How might the EIS structure subcontracting opportunities for local Yap/FSM firms in supporting the construction, dredging, and expansion activities to promote participation and reduce reliance on foreign companies?	The DoD will comply with Article IV of the Status of Forces Agreement with the FSM and will require contractors to utilize qualified local contractors to the maximum extent feasible.

#	Source	Commenter Name	Comment	Response
66	Email Comments	Bill Cords	23. What measures could ensure project benefits (e.g., jobs, training) for on-island vs. foreign participants and evaluate alternatives like local labor quotas or partnerships leveraging existing skills, including outreach for Yapese to fulfill project roles in unskilled, semi-skilled, and skilled labor?	The DoD will develop contractual language to ensure compliance with the terms of the SOFA which require a preference for local contracting and labor the extent practicable. Pursuant the SOFA use of third country labor will not be allowed where a workforce with appropriate skills is available on island. In addition the US will be conducting a socioeconomic study to establish baseline conditions and evaluate potential impacts to socioeconomic resources, such as housing, economic activity, and public services. The results of the study will be used to inform the analysis of impacts on socioeconomic resources in the EIS and provide applicable Best Management Practices, SOPs, or mitigations, if needed, to avoid or minimize adverse impacts to the Yap economy.
67	Email Comments	Bill Cords	24. How might the project align with historic U.S. goals under the United Nations Trust Territory of the Pacific Islands (administered by the U.S. from 1947-1986), the US Pacific Partnerships and US Navy Civic Action Programs, and the 1986 Compact of free Association (COFA} goals to build a skilled workforce, advance economic development, foster self-sufficiency, and reduce over-reliance on foreign aid or loss of citizens to outmigration?	The request for the project to align with historic U.S. goals under the TTPI is beyond the scope of this EIS. The DoD will comply with Article IV of the Status of Forces Agreement with the FSM which requires contractors to utilize qualified local contractors to the maximum extent feasible. Further, the EIS will analyze any impacts to socioeconomics and provide applicable Best Management Practices, SOPs, or mitigations, if needed, to avoid or minimize adverse impacts to the Yap economy.
68	Email Comments	Bill Cords	25. What workforce development initiatives (e.g., training, apprenticeships) and monitoring mechanisms could build on prior programs, and might they report to the Yap State Task Force for transparency, including incentives for skilled and unskilled Yapese to contribute to this project for general labor, concrete workers, equipment operators and other labor requirements as part of broader U.S.-FSM partnership objectives?	The DoD will comply with Article IV of the Status of Forces Agreement with the FSM and will require contractors to utilize qualified local contractors to the maximum extent feasible. Further, the EIS will analyze any impacts to socioeconomics and provide applicable Best Management Practices, SOPs, or mitigations, if needed, to avoid or minimize adverse impacts to the Yap economy.
69	Email Comments	Bill Cords	26. How might the EIS evaluate contractor selection criteria and/or contracting mechanisms, such as requirements or incentives for prime contractors to prioritize local Yap/FSM labor, subcontractors and suppliers to support host economic benefits and minimize environmental disruptions from external sourcing?	The process of contractor selection is not part of the EIS process. However, the EIS will focus on analyzing the impacts of the proposed action on the socioeconomics of the local community and conducting a socioeconomic study, which would result in potential measures or mitigations, if required, to avoid or minimize adverse impacts to the socioeconomic welfare of the Yap community. Further, the DoD will comply with Article IV of the Status of Forces Agreement with the FSM and will require contractors to utilize qualified local contractors to the maximum extent feasible.
70	Email Comments	Bill Cords	27. What alternatives could the EIS consider for project evaluations that encourage the use of local labor and firms, including performance metrics for contractors on hiring quotas or supplier preferences?	The DoD will comply with Article IV of the Status of Forces Agreement with the FSM which requires contractors to utilize qualified local contractors to the maximum extent feasible.

#	Source	Commenter Name	Comment	Response
71	Email Comments	Bill Cords	Scope Recommendations for Socio-Economic Impacts and Local Labor Prioritization: I suggest conducting a socio-economic baseline study assessing local labor availability and skills from US Navy and US Job Corps programs, factoring in outmigration trends, potential for repatriation, and historical U.S. development efforts under the Trust Territory and COFA to address economic vulnerabilities like limited job opportunities and aid dependency. Evaluating alternatives that prioritize local participation first, project prime contractor selection criteria, subcontracting plans, and sustainable development efforts-including contracting mechanisms or incentives for prime contractors to prioritize local Yap/FSM subcontractors and suppliers-with mitigation like quotas, performance metrics, and training funded via COFA/TAP would be helpful. Proposing diaspora outreach programs and return incentives to leverage the project for broader U.S.-supported goals of self-sufficiency and reduced emigration cou1d be valuable. Incorporating community input to contrast with less inclusive foreign FSM/Pacific Islands infrastructure projects.	Thank you for your recommendations. The DoD will be conducting a socioeconomic study to establish baseline conditions and evaluate potential impacts to socioeconomic resources, such as housing, economic activity, and public services. The results of the study will be used to inform the analysis of impacts on socioeconomic resources in the EIS and inform development of Best Management Practices, SOPs, or mitigations, if needed, to avoid or minimize adverse impacts to the Yap economy.
72	Email Comments	Bill Cords	28. How might the EIS ensure compliance with standards (e.g., COFA, local regulations) for dredge management and coordinate with the Yap Marine Resources Management Division?	The FSM, the State of Yap, and the U.S. have agreed that the Government of the United States shall apply the National Environmental Policy Act of 1969 as amended (NEPA) as if the Federated States of Micronesia were the United States, to the military projects at the Yap State International Airport and the Yap State Seaport. Furthermore, the U.S. shall also comply with standards substantively similar to those required by the Endangered Species Act of 1973, as amended; the Clean Air Act, as amended; the Clean Water Act, as amended (Federal Water Pollution Control Act); Title I of the Marine Protection, Research and Sanctuaries Act of 1972 (Ocean Dumping Act); the Toxic Substances Control Act, as amended; the Solid Waste Disposal Act, as amended, when constructing and using the military projects at the Yap State International Airport and the Yap State Seaport. The U.S. is working with the FSM and the YUMO Task Force to develop a SOP implementing Section 161(a)(4) of the COFA and to identify appropriate agencies for coordination.
73	Email Comments	Bill Cords	29. How might Yapese traditional ecological knowledge guide disposal site selection and management? Yapese have long used coral and material for fill for erosion control land reclamation.	Yap landowners and traditional leaders have indicated a preference for land reclamation and land-based disposal of dredge material which will be carried forward for detailed analysis in the Draft EIS. The Draft EIS will also include a comparison of all alternatives considered for the Proposed Action, including alternatives that may have been considered and not carried forward (e.g., ocean dredge disposal).

#	Source	Commenter Name	Comment	Response
74	Email Comments	Bill Cords	Scope Recommendations for Regulatory and Cultural Considerations: I recommend addressing compliance and consulting communities/traditional practitioners to integrate knowledge into mitigation, supporting heritage preservation.	This recommendation is noted and aligns with the intent of the EIS process. Addressing regulatory compliance while consulting with communities and traditional practitioners is an important aspect of ensuring that cultural knowledge informs potential mitigation measures, if required, and supports heritage preservation. Input from the public, including recommendations such as this, will help shape the scope of analysis and guide the development of appropriate mitigation approaches. We encourage continued guidance from all municipalities, especially those that may be affected, during the public scoping meetings. Compliance and consultation will be carried out through the consultation SOPs developed in coordination with the Yap State Task Force, and other applicable entities and organizations.
75	Email Comments	Bill Cords	30. How might the EIS outline DoD funding or technical assistance (e.g., via COFA/TAP) for the Task Force's Department of Resources and Development (R&D) to hire independent consultants for reviews of dredging impacts on reefs, habitats, and water quality?	The EIS will analyze the impacts of the proposed dredging activities on environmental resources including marine and water resources, and include potential Best Management Practices, SOPS, or mitigation measure, if required, to avoid or minimize adverse impacts. The DoD does not have statutory authority to provide direct funding for independent consultants but supports use of other funding sources to the extent available.
76	Email Comments	Bill Cords	31. What mechanisms could ensure consultant independence, prioritize local sensitivities, and build capacity (e.g., training, equipment for monitoring)?	Thank you for your comments, the US will continue to work with the YUMO task force to ensure consideration of local sensitivities and the design teams will work on development of appropriate specifications to ensure that biological and cultural monitors are not unduly influenced by construction contractors, however this is not part of the EIS process.
77	Email Comments	Bill Cords	32. How might technical assistance enable greater Yap involvement, including in evaluating dredge reuse for resilience?	Thank you for your comments, they will be relayed to the appropriate US DoD entities for consideration. The purpose of the EIS process is to analyze the impacts of the proposed action on environmental resources and include measures to avoid or minimize potential adverse impacts on those resources. As discussed in Comment #50, Yap landowners and traditional leaders have been consulted on dredge disposal alternatives and have indicated a preference for land reclamation and land-based disposal of dredge material. This action will be included in the detailed analysis of the Draft EIS.
78	Email Comments	Bill Cords	33. How might DoD engage the Task Force's Negotiation Team in consultations on impacts and funding, assigning roles for advisory members in integrating traditional knowledge?	Thank you for your comments, the US welcomes input from the Task Force Negotiation team and advisory members on impacts and integration of local traditional knowledge. Funding issues are not within the scope of the EIS. The purpose of the EIS process is to analyze the impacts of the proposed action on environmental resources and include measures to avoid or minimize potential adverse impacts on those resources.

#	Source	Commenter Name	Comment	Response
79	Email Comments	Bill Cords	34. What reporting requirements could ensure transparency on impacts, compliance, and adaptive management, including consultant contributions?	Thank you for your comments, they will be relayed to the appropriate US DoD entities for consideration. Requirements for monitoring and reporting are normally incorporated into construction specifications. The purpose of the EIS process is to analyze the impacts of the proposed action on environmental resources and include measures to avoid or minimize potential adverse impacts on those resources. An EIS is also by design a transparent process that allows the public to review and comment on the EIS analysis.
80	Email Comments	Bill Cords	Scope Recommendations for Funding, Technical Assistance, and Integration with Yap State Task Force/OCL Oversight: I suggest recommending dedicated funding streams under COFA or TAP for -R&D consultants, with clear guidelines for independence, local selection, and integration with the Task Force's oversight role (per Executive Order 12356). Including capacity-building elements like training workshops on EIS monitoring, emphasizing coordination with the Negotiation Team for consultations on dredging mitigation, would be beneficial. Ensuring transparency through joint reporting and adaptive management to balance development with Yap's heritage preservation and environmental protection could strengthen the approach.	Thank you for your comments, COFA and TAP funding are beyond the scope of this EIS; the purpose of the EIS process is to analyze the impacts of the proposed action on environmental resources and include measures to avoid or minimize potential adverse impacts on those resources.
81	Email Comments	Bill Cords	35. How might the EIS evaluate cumulative impacts of airport, seaport, road projects, and dredge disposal on reefs, ocean habitats, and cultural resources?	Cumulative impacts of other projects are no longer analyzed as part of the NEPA process, however, the EIS will evaluate the reasonably foreseeable impacts of the entire proposed action that encompass both the airport and seaport actions on environmental resources. Appropriate Best Management Practices , SOPs, or mitigation measures, if required, would be included to avoid or minimize adverse impacts to applicable resources.
82	Email Comments	Bill Cords	36. Could the EIS assess how climate change (e.g., sea-level rise, ocean acidification, storm intensity) might exacerbate project and disposal impacts on marine ecosystems, while exploring opportunities for building resilience and lessening environmental impact?	Per current DoD NEPA Implementing Procedures dated June 30, 2025, climate change is no longer considered in environmental reviews. However, infrastructure resiliency and the impacts of changing sea levels and storm intensity are still considered; the EIS will continue to evaluate the impacts of the proposed action on relevant environmental resources including marine and water quality, and include Best Management Practices , SOPs, or mitigation measures, if required, to avoid or minimize adverse impacts to applicable resources.

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83	Email Comments	Bill Cords	37. How might the project ensure ongoing community engagement, including transparent communication and local input throughout the EIS process, with local traditional leadership perspectives to preserve Yap's ecosystems and traditions in modern development?	Public and community engagement is an integral part of the EIS process and includes multiple opportunities for community feedback including the public scoping period and the public commenting period that allow the public and communities to provide feedback on the scope and determinations of the EIS impact analysis. The EIS would also engage with local communities and traditional leaders through the consultation process to assess the potential impacts to cultural and heritage resources and while conducting the socioeconomic study, which would include setting up interviews with Yapese communities and traditional leaders, if available, to understand and assess potential impacts to traditional, cultural, and subsistence resources.
84	Email Comments	Bill Cords	Scope Recommendations: I propose including a cumulative impact analysis addressing combined project and disposal effects. Conducting a climate change vulnerability assessment for infrastructure and disposal sites, along with beneficial opportunities for reuse of dredge material, would be useful. Ensuring robust community engagement with meetings in Yapese and opportunities for traditional leader input to guide preservation efforts could be valuable. Outlining a monitoring framework with enforceable mitigation measures and public reporting would support the process.	The FSM, the State of Yap, and the U.S. have agreed that the Government of the United States shall apply the US National Environmental Policy Act of 1969 as amended (NEPA), which includes a robust process for community engagement and analysis on the impacts of the proposed action on environmental and cultural resources. Cumulative impact analysis is no longer part of the US NEPA process, however the project will look at reasonably foreseeable impacts and will also consider infrastructure resiliency in light of changing sea levels and increasing storm intensity. Beneficial reuse of dredge materials is being considered as part of the proposed action. Consultations with traditional leaders regarding cultural resources is expected as part of the NHPA Section 402 process. The EIS ROD will contain required mitigation measures and the US is considering requiring contractors to hire community liaisons to assist with ensuring contractor compliance.
85	Email Comments	Bill Cords	Thank you for considering these matters and incorporating stakeholder input into the scoping of the EIS for the Yap Airport and Seaport improvements. I encourage the Department of Defense to consider these concerns, incorporating community and local traditional leadership input to protect Yap's unique and sensitive ecological and cultural heritage while fostering sustainable modern development and improvements that enhance Yap's infrastructure and society. Please confirm receipt of my comments, ensure they are considered in the Draft EIS, and provide updates on their incorporation.	Thank you for submitting your comments. They will be considered during the preparation of the Draft EIS.

#	Source	Commenter Name	Comment	Response
86	Email Comments	Michael Gawel	Please consider my attached comments, as a former FSM Chief of Marine Resources and a former TTPI Environmental Planner, on scoping for an EIS on planned airport and seaport developments in Yap. Thank you, Michael Gawel	Thank you for submitting your comments. They will be considered during the preparation of the Draft EIS.
87	Email Comments	Michael Gawel	Please consider my comments, as a former FSM Chief of Marine Resources and a former TTPI Environmental Planner and member of the Yap Institute of Natural Science, on scoping for the EIS on planned airport and seaport developments in Yap. The proposed projects would provide important valuable infrastructure improvements for residents of Yap and the FSM. However, these relatively very large projects can have serious negative impacts if not properly planned and managed. I hope these scoping comments and questions will help guide the DEIS.	Thank you for submitting your comments. They will be considered during the preparation of the Draft EIS.
88	Email Comments	Michael Gawel	1) Will the DEIS describe tentative airplane and vessels that may visit and their Yap uses by the US Navy, Air Force, Army, Marines, and Coast Guard and foreign allies?	Yes, the DEIS will describe proposed DoD operations and trainings in Yap, including the types of airplanes and vessels that may visit the airport and seaport.
89	Email Comments	Michael Gawel	2) Because of limited land area at Yap, will pre-position supply ships, as located in Saipan, be based at Yap for short or long periods? If so, what anchorage areas would be used and what impacts would be expected and mitigated?	The DoD is not proposing to locate pre-position supply ships in Yap. If that were to change in the future, additional environmental analysis would be required.
90	Email Comments	Michael Gawel	3) How will DoD training and emergency managers coordinate with Yap's managers of the Airport and Port? And with FSM Customs inspectors and Biosecurity staff? This would apply to visits by planes, vessels and people both during construction and operations.	The DoD is currently coordinating with the FSM and Yap State Governments on the proposed uses of airport and seaport. The EIS will analyze the impacts of the proposed action on environmental resources including biosecurity risks and will include best management practices, SOPs, or mitigations, if needed, to avoid or minimize impacts. If the proposed action does move forward after the environmental impact analysis is complete, then the DoD would be responsible for implementing the best management practices, SOPs, and mitigations included in the EIS. Biosecurity protocols would be included in contract, operation, and exercise requirements.

#	Source	Commenter Name	Comment	Response
91	Email Comments	Michael Gawel	4) Will nuclear weapons and nuclear-powered vessels be brought through Yap?	The DoD is not proposing to bring nuclear weapons or nuclear-powered vessels to Yap. If that were to change in the future, additional environmental analysis would be required.
92	Email Comments	Michael Gawel	5) What steps will be established to maintain security of military assets on Yap?	The U.S. Military would employ various standard security measures to maintain security of military assets on Yap. The particular measures used would vary depending on the asset and location. General measures may range from reliance on normal host nation security measures at joint use locations to additional security measures such as physical security (i.e. locks, fences, and barriers, use of security guards, monitoring and surveillance). Security will be coordinated with the appropriate Yap authorities such as airport security, seaport security, or local law enforcement. In situations where a Navy ship plans to berth at the port, the Navy would normally send a security team months in advance to work with the local authorities to determine security requirements.
93	Email Comments	Michael Gawel	6) Will Port improvements be planned to additionally service visiting tour cruise ships? What would be needed for this?	Thank you for your comments, the port improvements will increase the ability to use the port for cruise ship visits, however service of cruise ships is beyond the scope of the proposed EIS.
94	Email Comments	Michael Gawel	7) Will training and hiring of FSM citizens and businesses be prioritized for construction and operations?	Training of FSM citizens is beyond the scope of an EIS and this project. However, the DoD will comply with Article IV of the Status of Forces Agreement with the FSM which require contractors to utilize qualified local contractors to the maximum extent feasible. Further, the EIS will analyze any impacts to socioeconomics and provide applicable Best Management Practices, SOPs, or mitigations, if needed, to avoid or minimize adverse impacts of the project on the Yap economy.
95	Email Comments	Michael Gawel	8) Can Yap and FSM participate in reviews of and selection of contractors to be brought to Yap? And be able to deny rewards to proposals from contractors they find problematical?	Thank you for your comments. The US is required to select contractors in a closed process under the Federal Acquisition Regulations, however the US will include provisions in its solicitations to require compliance with local contracting and hiring preferences in the SOFA and to encourage efforts to train and hire locally.
96	Email Comments	Michael Gawel	9) Water quality standards of FSM should be addressed for impacts of sediment from dredging and land clearing.	The purpose of the EIS process is to analyze the impacts of the proposed action on environmental resources, such as water resources, and include best management practices, SOPS, or mitigations, if needed, to avoid or minimize adverse impacts. Further, the FSM, the State of Yap, and the U.S. have agreed that the Government of the United States shall comply with standards substantively similar to those required by the Clean Water Act when constructing and using the military projects at the airport and seaport.
97	Email Comments	Michael Gawel	10) UXO surveys should be done as appropriate at construction sites.	A Historical Ordinance Assessment Report has been completed and DoD is aware that there is a high probability of encountering UXO in undeveloped areas near the airport. DoD is developing plans for appropriate surveys prior to the start of earthmoving and intends to work with Yap State to identify a location for demolition of UXO if discovered.

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98	Email Comments	Michael Gawel	11) If US EPA, FWS, NOAA and Historic Preservation requirements are not followed in the proposed projects' permitting, the DEIS should describe what aspects of US federal regulations are not being addressed.	For the projects covered by the seaport and airport project EIS, the FSM, the State of Yap, and the U.S. have agreed that the Government of the United States shall comply with standards substantively similar to those required by the Endangered Species Act of 1973, as amended; the Clean Air Act, as amended; the Clean Water Act, as amended (Federal Water Pollution Control Act); Title I of the Marine Protection, Research and Sanctuaries Act of 1972 (Ocean Dumping Act); the Toxic Substances Control Act, as amended; the Solid Waste Disposal Act, as amended. The DEIS will include a statement of this requirement.
99	Email Comments	Michael Gawel	12) Can experts from the University of Guam Marine Lab be prioritized for conducting marine resources assessments and monitoring? They have experience with and knowledge of Yap Proper's environmental conditions, high diversity of marine life and local Yap officials and stakeholders. And they are much less costly than and better than bringing in scientists not familiar with Yap, coming from Hawaii or elsewhere, who would have difficulty working with Yap's high species diversity.	Thank you for your comments. They will be relayed to the appropriate DoD entities for consideration. These decisions are beyond the EIS process.
100	Email Comments	Michael Gawel	13) Dredging should be prohibited during times when annual mass spawning of corals is projected.	The EIS will identify and assess potential avoidance and minimization measures including the limitation or exclusion of dredging activities during coral spawning events.
101	Email Comments	Michael Gawel	14) For planning and design purposes, ocean currents at project sites need measurements at different seasons. Local Yapese could be trained to do this and supplied with needs for these measurements. Otherwise, scientists from Guam, FSM or Palau could do this more cheaply than bring back scientists from the US. Projections of different ENSO conditions affecting tides and currents should be considered in planning.	Thank you for your comments, they will be relayed to the appropriate US DoD entities for consideration. These decisions are beyond the EIS process.
102	Email Comments	Michael Gawel	15) Will proposed weekly landings of cargo and fighter planes have major impacts on Yap residents' quality of life and cultural landscapes? I believe Yapese that I know are very sensitive to loud noises.	The Proposed Action includes some weekly landings of aircraft. Up to two 14-day exercises will take place per year with aircraft activities during the day and potentially with nighttime operations. The EIS will include an airfield noise analysis to assess potential impacts to residents and noise sensitive uses. The EIS will also provide applicable Best Management Practices, SOPs, or mitigations, if needed, to avoid or minimize adverse noise impacts.

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103	Email Comments	Michael Gawel	16) Will impacts to historic sites, including those in the port peninsula area and Yap Airport area be addressed? And impacts to the old German submerged terminal for the marine cable linked to Hong Kong that is in the main channel to Colonia and was used over a century ago should be addressed.	Potential effects on historic properties will be addressed in the EIS, in coordination with the Yap Historic Preservation Office and through consultation under the National Historic Preservation Act, Title 54 USC § 307101(e) [formerly known as Section 402] with other Stakeholders. The reference to the German submerged terminal underscores the importance of both well-documented and lesser-known historic resources. While detailed information on this resource has not yet been compiled, the EIS will take it into consideration as part of the assessment. We also welcome any additional knowledge or references from the community to ensure this resource is properly evaluated.
104	Email Comments	Michael Gawel	17) Proposed “minor dredging at additional locations…to support delivery of dredged materials” requires identification of alternate sites for this and baseline surveys of resources and assessment of impacts. If this dredging will be for delivering fill materials to the airport and roads, mitigation might include design that benefits local boat access after the construction projects. And biosecurity requires inspection at material source sites outside of Yap, at transport facilities and at Yap before unloading.	Your comments are greatly appreciated and will be considered while developing the Draft EIS. The EIS will fully evaluate the impacts of the proposed action on environmental resources including conducting baseline surveys, Best Management Practices, SOPs, or mitigations, if required, to avoid or minimize adverse impacts.
105	Email Comments	Michael Gawel	Some related references that should be available at Yap Government files should be reviewed: 1) MG EIS: Dredging EIS with Fred 199? 2) Roads at Colonia 1977 3) ML Tech report sewage outfall 197?	Thank you for providing these references. We will request them from the Yap Government.
106	Email Comments	Robert Underwood	Mike, As always, a great job- very thoughtful and professional. I will share this with some colleagues in PCIS as well as others. Robert	Thank you for your comment.

#	Source	Commenter Name	Comment	Response
107	Email Comments	Michael Gawel	Additional public comments for Yap scoping for DEIS, from Michael Gawel. Some related references that should be available at Yap Government files (maybe at Public Works) should be reviewed. These would include: 1) Otte, Fred, and Michael Gawel. 2003. EIS for coral dredging near the village of Dulkan, Municipality of Ruul, Yap Proper. 2) Otte, Fred, and Michael Gawel. 2003. DEIS for coral dredging near the village of Yinuuf, Municipality of Ruul, Yap Proper. 3) PBEC- Ron Strong and Michael Gawel. 1977. A limited current and biological survey for proposed road improvements at Colonia Yap. 4) US Army COE POD. 1988. Yap Islands coastal resource atlas Also, Some of the UoG Marine Lab numbered Technical Reports relevant to the DEIS development are below. Available online. Other Marine Lab documents and data also should be researched: 24. AMESBURY, S.S., R.T. TSUDA, R.H. RANDALL, C.E. BIRKELAND, & F. CUSHING. 1976. Limited current and underwater biological survey of the Donitsch Island sewer outfall site, Yap, Western Caroline Islands. 35.AMESBURY, S.S., R.T. TSUDA, R.H. RANDALL, & C.E. BIRKELAND. 1977. Marine biological survey of the proposed dock site at Colonia, Yap. 45. TSUDA, R.T., editor. 1978. Marine biological survey of Yap lagoon. 162 pages. 46. TSUDA, R.T., M.I. CHERNIN, J.O. STOJKOVICH, D.R. LASSUY, & B.D. SMITH. 1978. Marine environmental studies of selected sewer outfall sites in the Yap Central Islands and on Falalop Island, Ulithi Atoll, Yap Outer Islands. 101 pages. 78. STRONG, R.D., R.H. RANDALL, T.L. SMALLEY, B. BUMOON, & O. BOWOO. 1982. Environmental assessment for proposed dredging operations in Yap Lagoon. 88 pages.	Thank you for providing these references. We will request them from the Yap Government.
108	Email Comments	Michael Gawel	The DEIS and plans should consider planning and mitigation to support local, Non-Profit and Regional Aircraft in the future with new Yap airport construction and maintenance.	Thank you for the recommendations, they will be considered in the preparation of the Draft EIS.

#	Source	Commenter Name	Comment	Response
109	Email Comments	Margie Falanruw	Thank you Ladies and Gentlemen of the DOD for committing to do a full environmental assessment of the DOD port, road and airstrip project on Yap. While we have previously expressed concerns verbally in an impromptu meeting of Mayor Jeffery Adalbai and I with a DOD team of lawyers and several biologists, I am, for the record, now providing them in writing. I have resided on Yap for the past half century or so working as a biologist and ethnobiologist. I did not know about the first scoping meeting held in July, and only learned about the meeting with the Milew community from our Mayor shortly before it was held, so was not prepared to provide comments at that time as we needed to first learn more about the project. I do appreciate your sharing of information with the community at that meeting. There has been limited time to prepare these written comments as I was preparing for a presentation at the International Bat Research Symposium (IBRC) in Cairns Australia from where I am hurriedly submitting these written comments. I will focus my comments on impacts on mangroves and fruit bats, and defer to Yap's Science Team for additional comments on mangroves and marine resources; and to Yap's Community for comments on cultural impacts. As I am away from my library, references to back up these comments are incomplete at this time but full citations can be provided on request.	Thank you for submitting your comments. They will be considered in the preparation of the Draft EIS.
110	Email Comments	Margie Falanruw	1. It is important that the environmental assessment include not just the footprint of the airstrip, but also the downstream habitats that will be affected. It is important that the environmental assessment include not just the footprint of the airstrip, but also the downstream habitats that will be affected. My biggest concern as a biologist, is the impact that the airport project will have on Yap's largest mangrove that lies downhill of the project. Mangroves are a keystone community that is important for the integrity of the marine environment, including fisheries, that are so important for the sustenance and health of Yapese. This mangrove also provides habitat for birds, including endemic birds, and Yap's endemic and threatened fruit bats (aka flying foxes).	The Draft EIS will evaluate potential impacts within a region of influence (ROI) impacted by the Proposed Action and include best management practices, SOPS, or mitigations, if needed, to avoid or minimize adverse impacts

#	Source	Commenter Name	Comment	Response
111	Email Comments	Margie Falanruw	2. Mangroves are important and must be protected Yap's mangroves are the most biodiverse in the FSM, with as many mangrove tree species as Palau in spite of Yap's smaller size. A full listing of Yap's mangrove tree species can be found in Falanruw (2008). The diversity of epiphytic plants and marine life in our mangroves has not been assessed. Research conducted on Yap has shown that while our mangroves provide about 13% of Yap's vegetative cover, they sequester about 33% of the CO2 removed from the atmosphere by our vegetation. As such our mangroves are an important green machine to combat global warming and sea level rise. Both the mangrove and marsh areas downslope of the DOD airstrip project have been identified as areas of special biodiversity significance (TNC. 2003. A Blueprint for Conserving the Biodiversity of the FSM. 103pp).	Potential impacts to mangroves will be analyzed in the EIS, including the identification of potential design elements and best management practices to avoid and/or minimize potential effects to mangroves to the extent feasible.
112	Email Comments	Margie Falanruw	3. Seagrass meadows and coralline reef systems are important and must be protected The literature is full of information about the importance of mangroves to the marine environment and fisheries, so I will not elaborate on this here. There is also much literature on the productivity and importance of seagrass beds. A full listing of Yap's seagrass species is given in Falanruw (2008). Seagrass meadows are important habitat for a multitude of marine life including siganid ("rabbit fish") fish that are one of Yap's favored sources of protein, as well as certain soft fleshed fish that fathers customarily provide for their babies first meals when they are being weaned. Mangroves and seagrass beds also provide habitat for women to collect shellfish and other marine life, and fibers from Enhalus acoroides are a utilized to make unique nets that can last for generations (Falanruw, Seagrass Nets, 40th Anniversary edition of the Atoll Research Journal).	The EIS will analyze impacts to seagrass meadows and coral reef systems which will include evaluating impacts against baseline conditions. Relevant Best Management Practices, SOPs, or mitigations, if required, to avoid or minimize adverse impacts will be identified and assessed. Avoidance and minimization measures may include the use of silt curtains, turbidity monitoring, scheduling activities to avoid spawning season for certain coral species, etc. The DoD has conducted marine resources baseline surveys and is conducting a dredge plume modeling study to determine potential impacts to these resources.

#	Source	Commenter Name	Comment	Response
113	Email Comments	Margie Falanruw	4. The connectivity of natural systems must be maintained The connectivity of the mangrove/ seagrass meadow / channels and coral reef communities are well documented in the scientific literature. Maps of the connectivity of Yap's natural communities from land to sea are provided in several issues of the Yap Almanac Calendar, and in other more detailed publications. Evidence of the connectivity between the mangrove below the airport and fisheries of southern Yap is demonstrated by the great density of ancient stone fish weirs to the south of the mangroves that lie downslope of the airport project (Yap's Stone Fish Weirs as a Nature Integrated Technology, Falanruw, M.V,C. and L. Falanruw). It will be important to conduct current studies to evaluate the impact of the outflow of water from the airport project as impacts to the mangrove will affect down current habitat and resources as well.	The EIS will evaluate the impacts of the proposed action on natural resources and include Best Management Practices , or mitigation measures, if required, to avoid or minimize adverse effects.
114	Email Comments	Margie Falanruw	5. Runoff and Silt retaining ponds must be large and strong enough to prevent a flush of rain water and silt into taro patches and the mangrove. There must be a program for maintaining silt filtering ponds. Mangroves protect the land from storm surges, an important function at this time of climate change when there is an increase in the incidence of super typhoons and storm surges. Their effectiveness can be seen in Falanruw (2004) that compares the limited damage from typhoon Sudal to coastal areas that were protected by mangroves in comparison with an area where the mangrove trees had been killed. This can be further substantiated with aerial photos taken during the aftermath of typhoon Sudal. The removal of mangroves was like opening a window for the typhoon to come in. Damage to mangroves will also release a large amount of silt that will damage marine life, as we have seen when the current airstrip was built, and in the aftermath of damaged mangroves shown in Falanruw (2004).	The purpose of the EIS process is to analyze the impacts of the proposed action on environmental resources including impacts to the stormwater management system and impacts to mangroves. In addition to the analysis of impacts on these resources, the EIS will include best management practices, standard operating procedures, or mitigations, if needed, to avoid or minimize adverse impacts of the project on the stormwater system and mangroves.

#	Source	Commenter Name	Comment	Response
115	Email Comments	Margie Falanruw	6. Fruit bats are keystone species and must be protected. A fruit bat monitoring program that includes training and equipping a local team must be initiated as mitigation for the project. The large mangrove below the airport is important to Yap's natural communities in multiple ways. It provides an important roosting site for Yap's threatened endemic Pteropus fruit bats (aka flying foxes). Fruit bats are keystone species important for the maintenance of forests throughout Yap through their pollination and seed dispersal services. They are also a food source, and a visitor attraction. Bats have well developed immune systems. Research is underway to determine if their cancer protection mechanisms can lead to breakthroughs in the treatment of cancer in humans. Damage to mangroves and increased air traffic would impact Yap's largest fruit bat roosts. Defoliation of mangroves increases heat stress from both increased temperature and exposure to sunlight. Heat stress has caused massive die backs of fruit bats in Australia and there are anecdotal reports of probable cases in Chuuk, and in Yap after the defoliation caused by typhoon Sudal. Research presented at the IBRC predicts alarming percentages of fruit bat dieback due to rising global temperatures. This will cause cascading impacts on forests and production of bat pollinated fruits. While male fruit bats may fly long distances, research is showing that when pregnant and while nursing pups, female bats do not fly far from roosts, making them especially vulnerable to damage to mangrove roosts downslope of the airport. The development of a fruit bat monitoring program is critical to mitigating impacts of the DOD project. Yap has had but one preliminary survey of fruit bats, conducted 41 years ago, about 3 years after the abatement of the fruit bat trade that devastated populations in the late 1970's and early 1980's. This index survey estimated a density of 30-60 bats per sq km (Engbring 1985), which is far below the natural density of 125-250 bats per sq	Potential impacts to fruit bats will be evaluated in the EIS and the DoD will be consulting with the Yap State Division of Forestry and Agriculture on potential impacts to sensitive biological resources, including the identification of potential avoidance, minimization, and mitigation measures as necessary.

#	Source	Commenter Name	Comment	Response
116	Email Comments	Margie Falanruw	7. Protocols and provisions are needed at both the port and airport to prevent the entry of invasive species. Protocols and provisions are needed at both the port and airport to prevent the entry of invasive species such as snakes that could wipe out Yap's birds, and the coconut rhinoceros beetle that could devastate Yap's coconut trees that are so important for food security. There have been past incidences where a large skink native to an Outer Island was transported to Guam on a military plane, so we know the reverse transfer of a serious invasive species to Yap is possible.	The DoD is coordinating with the FSM Government and the Yap State Government on the necessary biosecurity protocols and the EIS will include a description of the agreed upon protocols.
117	Email Comments	Margie Falanruw	8. Taro patches should be protected from siltation and flooding. Between the mangroves and airport site, there is marshland habitat used for traditional taro cultivation, including a unique and remarkable, locally famous, system of floating taro patches (Falanruw, Taro Growing on Yap). Taro (of multiple genera, species, and many varieties) is a staple of Yapese diet and the taro produced in the floating taro patches was prized for its quality. Unfortunately, this unique system of taro cultivation was severely damaged as a result of the construction of the current airstrip when especially heavy rainfall broke through the pond meant to manage siltation, resulting in a surge of silt laden water from the denser upland soils into the taro patch. In addition, the construction of the airstrip and road resulted in the death of the mangrove that formally extended above the road. It also damaged the mangrove, seagrass beds and coralline habitats of the lagoon, making this mangrove and its associated communities especially vulnerable to additional impacts.	The purpose of the EIS process is to analyze the impacts of the proposed action on environmental resources including impacts to the stormwater management system and impacts to taro patches. In addition to the analysis of impacts on these resources, the EIS will include best management practices, standard operating procedures, or mitigations, if needed, to avoid or minimize adverse impacts of the project on the stormwater system and taro patches.

#	Source	Commenter Name	Comment	Response
118	Email Comments	Margie Falanruw	9. It is important that biological and ecological assessment be linked with engineering solutions and monitoring that defines thresholds of acceptable change to manage impacts of the project. I appreciate the engineering efforts to manage silt runoff mentioned at the community meeting and hope that they are sufficient to accommodate the volume of runoff that can occur with predicted increases in rainfall intensity, especially in these heavy clay soils with low permeability. We will need support to evaluate this. The maintenance of these silt and runoff management ponds is critical and a maintenance program will be needed. It is important that biological and ecological assessments be linked with engineering solutions to manage impacts of the project, especially the management of runoff and siltation; and that construction operations and impacts be monitored for compliance with environmental protection standards, measures and defined limits of acceptable change. We have experienced past operations, that, in spite of being preceded by environmental assessments, have resulted in unnecessary damage as a result of lack of continuity between good intentions, engineering, and actions of bulldozer operators. I am glad your team includes both biologists as well as engineers, and plans for monitoring construction and impacts. It is my hope that this project will demonstrate and set standards for environmentally responsible construction on our islands.	Details of the proposed action are still being developed. Your comments are appreciated and will be considered while developing the EIS. The EIS will evaluate the impacts of the proposed action on environmental resources and include Best Management Practices, or mitigation measures, if required, to avoid or minimize adverse effects.
119	Email Comments	Margie Falanruw	In addition to its ecological importance, the Gaaliil mangrove area below the airstrip is, to me, one of the most beautiful places on Yap with considerable potential as a visitor attraction. When one kayaks through the mangrove at high tide and light projects shadows of trees onto the water, it seems that one is floating between heaven and earth. At low tide, with mangrove roots exposed, it is a weird and wonderful place. One must visit at both tides.	Thank you for your comments.

#	Source	Commenter Name	Comment	Response
120	Email Comments	Margie Falanruw	References Note: As I am away from my library, references to back up comments are incomplete at this time but full citations can be provided on request. Engbring, J. 1985. A 1984 survey of the fruit bat (maga'lau) on Yap. U.S. Fish and Wildlife Service, Honolulu. Falanruw, M. V.C. 1989. Traditional, Recent and Future Management of Fruit Bats on Yap -A Case Study. 1989. Proceedings of the Workshop on Customary Tenure, Traditional Resource Management and Nature Conservation, 28 March to 1 April, Noumea, New Caledonia. Falanruw, M.C., C.D. Whitesell, T.G. Cole, C.D. MacLean, A.H. Ambacher. 1987. Vegetation Survey of Yap, Federated States of Micronesia, USDA Forest Service, Resource Bull. PSW-21, 9pp+ 4 maps. Falanruw, M.V.C. 1988. On the status, reproductive biology and management of fruit bats of Yap. Micronesica 21 (1-2), pp. 39-51. (accepted ca. 2 years earlier) Falanruw, M.V.C. 1988. Management of fruit Bats on Yap, Caroline Islands: Past and Future Challenges, Transactions of the W. Section of the Wildlife Society 24:38-41. Falanruw, M.V.C. Taro Growing on Yap, Proceedings,,,,Falanruw, M.V.C. & C.J. Manmaw. 1990. Protection of Flying Foxes on Yap Island. Symposium on Flying Foxes, Bat Conservation International, Honolulu 6pp. Falanruw, M.V.C. 1981. Interim report on fruit bats of Yap. Report provided to First Yap State Legislature. Falanruw, M.V.C. 1986. Traditional Agriculture/Resource Management Systems in the High Islands of Micronesia. Paper prepared for the U.S. Congress, Office of Technology Assessment Project on Integrated Renewable Resource Management for U.S. Insular Areas. Falanruw, M.V.C. 1994. Food Production and Ecosystem management on Yap. Isla, A Journal of Micronesian Studies, University of Guam, 2:1:5-22. Falanruw, M.V.C. 2008. Mangroves and Seagrasses of Yap, Yap Almanac	Thank you for providing this list of references. The team will reach out if further information is needed.

#	Source	Commenter Name	Comment	Response
121	Email Comments	Yap State Government	Subject: Yap State Government Scoping Comments on the U.S. Department of Defense Yap Airport and Seaport Projects Dear Mr. President: The Yap State Government, through the Yap U.S. Military Operations Task Force, has prepared its first-round scoping comments on the proposed U.S. Department of Defense (DOD) projects at the Yap International Airport and the Yap Seaport. These comments reflect inputs from the Yap State Government with consideration of the views and concerns raised by our traditional leaders and the communities of Yap. We understand that the process remains open for public submissions and that the people of Yap may continue to send their views directly to the U.S. Department of Defense through the official email address made known to the public. Yap is at the Nations forefront of these strategic DoD efforts. The proposed developments have the potential to significantly affect our environment, communities, and way of life, with implications that extend to the broader national interest. As emphasized from the outset, this is a matter that holds imperative strategic importance requiring close collaboration and prompt support from the National Government. With respect, we request that these comments be transmitted in full to the relevant U.S. Department of Defense team involved with these projects. We further request the active and coordinated support of the National Government to ensure that Yap's concerns are addressed, that transparency and community engagement remain central to the process, and that the final outcomes protect our people, resources, and cultural heritage.	Thank you for submitting your comments. The US DoD Team greatly appreciates and values the comments we received from the FSM, Yap State government and Yapese communities and all comments will be considered in development of the EIS.

#	Source	Commenter Name	Comment	Response
122	Email Comments	Yap State Government	1. Full disclosure of future uses: To date, DOD has provided limited information about future uses of Project infrastructure. As you can imagine, this is an issue of significant importance - environmentally, and from a regulatory perspective. DOD must clearly identify all foreseeable uses of the proposed facilities and infrastructure. This includes not only initial or stated purposes, but the full range of potential long-term activities that may occur as a result of the improvements. 'For example, DOD's Notice of Intent specifically references the Mariana Islands Training and Testing (MITT) activities, which involve a broad array of military operations. Will some or all of these come to Yap? Which ones, when, and how often? The EIS must provide a clear and comprehensive explanation of all expected and possible future uses - including, but not limited to, those related to MITT - so that the public can fully understand the scope of impacts and evaluate the cumulative and long-term consequences of the Project. Referencing other projects and documents for activities outside of the FSM for which the FSM and its States had no role in the approval process is not sufficient to explain the future use of the Project.	The EIS will describe anticipated uses of the improved airport and seaport.

#	Source	Commenter Name	Comment	Response
123	Email Comments	Yap State Government	2. Immediate release of outstanding reports: The Task Force has submitted comments based on its review of the reports and materials made available so far, but there are important documents that have not been shared. This includes the initial findings on cultural impacts from the airport project, the natural resources assessment, and the hydrology report. These reports are essential for meaningful participation in the scoping and EIS process and must be released as soon as possible to allow adequate time for community review and informed comment before the scoping comment period closes. If DOD has confidentiality concerns (e.g., regarding cultural resources reports) we would be glad to help try to resolve them. But we do not want affected stakeholders to feel that important information is being withheld or that requests for disclosure are being ignored.	Finalized studies that inform the EIS analysis will be shared with the public, pending redaction of any confidential or copyrighted information, studies are normally shared as part of the appendices of the EIS when it is released for public review.
124	Email Comments	Yap State Government	3. Transparent access to information: Transparency is key. All technical reports, project documents, and environmental data should be made available to the public online, in accessible formats, and with enough time for communities to review and respond. This can be done via a DOD dedicated website or through one of DOD's contractors, since it is unclear whether the civilian contractors have the same prohibitions about creating an online repository of documents: We note that other military projects in the region have found it useful to maintain online document repositories. It is imperative that the dedicated website go live as soon as possible. Requiring the community to submit scoping comments without providing the community with access to information about the Project is not consistent with the requirements of NEPA and is contrary to how decisions are made under Yapese custom and tradition.	Public engagement is an integral part of the US NEPA EIS process and a dedicated project website is being developed to facilitate public access to the EIS and reports that inform and support the EIS analysis when they are finalized.

#	Source	Commenter Name	Comment	Response
125	Email Comments	Yap State Government	4. Comprehensive Alternatives Analysis: We emphasize the DOD's responsibility under NEPA to rigorously identify and evaluate all reasonable alternatives to the proposed projects - not only for specific activities such as laydown areas and dredged material disposal, but for the projects as a whole. While the Task Force and other stakeholders have identified potential sites for consideration, it is ultimately DOD's obligation to ensure that the EIS presents a full range of alternatives. This is essential so that the broader Yap community can understand and compare the environmental consequences of each option, and meaningfully participate in shaping a path forward. Only through this transparent and inclusive process can the community and DOD work toward decisions that are both environmentally responsible and mutually beneficial.	The EIS will analyze alternatives that best fulfill the project's purpose and need while also considering the needs of the environment and the community. The US Team is currently developing alternatives that meet the purpose and need of the project and that consider the comments we receive at the public scoping meetings. The EIS will also explain alternatives considered but not carried forward because they do not fulfill the project's purpose and need.

#	Source	Commenter Name	Comment	Response
126	Email Comments	Yap State Government	5. Holistic Impact Assessment: Finally, the EIS must take a big-picture view. The proposed projects are not just infrastructure upgrades-they will fundamentally reshape the island's environment, communities, and way of life. Yap's land and ocean are deeply interconnected, and changes in one area will ripple across the entire system. The Task Force has heard from community members and traditional leaders who have expressed concern about the many unknowns surrounding the proposed project - an understandable reaction given that this is the first time a process like this has been undertaken in the FSM and given the size and scope of the Project. One of the central concerns is how a sudden increase in population - from construction crews and military personnel - could place significant strain on local infrastructure, including water, sewage, power, and health care systems. Community members have also raised the potential for broader social impacts in Yap's small, tightly connected villages, where such changes could affect daily life and traditional structures. Environmental and coastal impacts are another area of concern. Communities have voiced fears about harm to critical marine ecosystems that support food security, cultural practices, and livelihoods. There is also anxiety about how dredging and shoreline modifications could alter wave patterns, increase flooding, and worsen coastal erosion - especially during storms and typhoons. Biosecurity threats, such as the introduction of invasive species through increased movement of people and materials, have also been highlighted. Finally, the Milew Village community, with the support of the Council of Pilung, has clearly opposed any expansion beyond the existing airport boundary for the proposed Warehousing and Life Support Area. These concerns provide important context for the detailed comments that follow, which are offered to help ensure that the EIS fully addresses the range of	The purpose of the EIS is to analyze the impacts of the proposed action on a robust set of environmental resource areas.

#	Source	Commenter Name	Comment	Response
127	Email Comments	Yap State Government	In closing, the Task Force and the people of Yap understand the gravity of this moment. As stewards of these islands, we take seriously our responsibility to protect our home for future generations. Yap is a small island where everything is connected - changes to the land affect the ocean, and impacts on the reef affect our food, culture, and economy. The EIS must take a truly holistic view that treats these, systems as one interconnected whole, offering honest, complete assessments that lead to real protections and thoughtful planning. It must also adopt adaptive strategies that can respond as conditions evolve. The Project is not a small one - it represents major changes that will reshape Yap's environment, economy, and way of life for generations to come. The Yap State Government respectfully asks DOD to fully consider and address all of the concerns outlined in this comment. The people of Yap, through the Task Force and traditional leaders, are participating in this process in good faith and with deep commitment. We are ready to work together toward outcomes that respect our environment, culture, and the rights of our communities. Please find Yap States detailed first round comments enclosed herein. We look forward to continued dialogue and meaningful collaboration as this process moves forward.	The US DoD Team greatly values the partnership it enjoys with FSM and Yap State government and is committed to the welfare of the local environment and communities. Conducting this EIS is an important commitment of the US DoD Team towards this goal as the EIS process is an analysis of the reasonably foreseeable impacts of the proposed projects on environmental and cultural resources and includes Best Management Practices, SOPs, or mitigation measures, if required, to avoid, minimize, or mitigate any potential adverse impacts.

#	Source	Commenter Name	Comment	Response
128	Email Comments	Yap State Government	Erosion and Sediment Risk: The soil in the project area--especially the Gitam soil type--is known to erode easily, which means there's a real risk of soil washing away and harming nearby mangroves, sea grass beds, reefs, and waterways. To better understand and manage this, more soil testing is needed at the airport site, and samples should also be taken from nearby reefs and areas where sediment might travel during dredging. The EIS should include a detailed soil sampling plan, including measurements every 50 meters in the construction area as well as monitoring of sedimentation rates in the surrounding reef and mangrove environments. This will help establish a baseline for sediment levels so changes can be tracked and managed during and after construction.	The EIS will analyze any impacts to geology, topography and soils which would include evaluating impacts against baseline conditions and include relevant Best Management Practices , SOPs, or mitigations, if required, to avoid or minimize adverse impacts. Best Management Practices and SOPs may include erosion control measures, and a stormwater pollution prevention plan. The EIS will comply with standards substantively similar to those required of the Clean Water Act.
129	Email Comments	Yap State Government	Geological Stability: Before building anything new, we need to make sure the ground can support it---specially in a place like Yap that's vulnerable to strong storms and possible earthquakes. Core samples from different parts of the reef should be studied to check the strength and structure of the seabed. The EIS should include tests that assess how much weight the seabed can bear, how it might respond to earthquakes or typhoons, and whether climate change could make those stresses worse in the future.	The new wharf extension at the Seaport is being designed according to results from project-specific geotechnical testing and to meet sea level rise parameters.
130	Email Comments	Yap State Government	Changes to the Land and Water Flow: Building runways, roads, and new buildings will change the shape of the land and how water flows across it. This could affect the watershed that provides drinking water to the Milew community and all communities south of the airport. The EIS should carefully study how these changes might redirect water, cause flooding, or reduce water quality. It should include maps showing how water flows now and how it's expected to change after construction. It should also propose steps to protect the watershed and monitor water quality and flow long-term.	The EIS will analyze any impacts to geology, topography and soils which would include evaluating impacts against baseline conditions and include relevant Best Management Practices , SOPs, or mitigations, if required, to avoid or minimize adverse impacts. Best Management Practices and SOPs may include erosion control measures, and a stormwater pollution prevention plan. The EIS will comply with standards substantively similar to those required of the Clean Water Act.

#	Source	Commenter Name	Comment	Response
131	Email Comments		Changes to the Land and Water Flow: In addition, Yap experiences frequent droughts. DOD must identify its need for water, both during the construction phase and during military use of the Project after construction, to determine whether Yap's current water systems can handle the additional demand for water, especially during drought conditions. It is imperative that the water table for the Southern Water System not be damaged.	The EIS will identify construction and operational period water requirements and evaluate the potential impacts of these proposed needs to determine needed measures to avoid, minimize, or mitigate impacts to the water table.
132	Email Comments	Yap State Government	Community Opposition to Proposed Expansion Areas: The Milew Village community, through their traditional leaders and the Council of Pilung, has clearly stated they do *not* support any expansion beyond the current airport boundary to make room for the proposed Warehousing and Life Support Area.	The DoD greatly values the concerns of the local Yap communities, and will continue to work with the local communities to ensure that concerns are heard and addressed where feasible. The EIS is an important process that helps identify potential impacts of the proposed action on environmental resources and communities and provides potential measures and mitigations, if needed, to avoid and minimize any adverse impacts.
133	Email Comments	Yap State Government	Land Ownership and Community Consent: There is still a lot of uncertainty about whether the land needed for these projects will be purchased or leased, and how property lines might be changed. The EIS needs to clearly explain which lands will be affected, how land values will be determined, and whether the proper consent has been obtained--especially through traditional landowners and leaders. It's important that detailed maps of all impacted areas are included, and that land decisions respect Yap's customary land ownership systems.	Thank you for your comments. They will be relayed to the appropriate DoD entities for consideration. The EIS will evaluate the potential impacts of the proposed action on Land Use such as which lands may be impacted and how their usage may change due to the proposed action. The US is committed to providing financial assistance to the FSM to assist with provision of reasonable compensation for acquisition of private property interests by the FSM or Yap State. However, decisions and details on any potential real estate transactions are beyond the EIS process.
134	Email Comments	Yap State Government	Impacts on Traditional Farming: Construction could seriously disrupt traditional farming areas--especially taro patches, which are a vital source of food and part of Yapese culture. Some of these systems, like floating taro patches, are especially vulnerable to dirty water and sediment caused by construction. The EIS should carefully survey all taro patches that could be impacted by the projects, identify what steps will be taken to protect water quality, and plan for ways to support local food production if farming is affected. Healthy food sources and food security are a priority.	The DoD is working with the FSM and Yap government to coordinate with the individual local communities. A socioeconomic study will be conducted that will take into account many of the concerns stated here. This study will be included in the EIS analysis of impacts and include potential measures, if required, to avoid, minimize, or mitigate adverse impacts.

#	Source	Commenter Name	Comment	Response
135	Email Comments	Yap State Government	Compensation Process and Management: The EIS must establish a clear, transparent compensation process for all affected landowners and communities. This includes detailed protocols for property valuation, compensation calculation methods, timing of payments, and appeals processes. The compensation framework must respect traditional land ownership systems and provide fair market value assessments. The EIS should outline how compensation will be managed throughout all project phases and establish mechanisms for addressing disputes or concerns about compensation adequacy.	Thank you for your comments. They will be relayed to the appropriate DoD entities for consideration. The EIS will evaluate the potential impacts of the proposed action on Land Use such as which lands may be impacted and how their usage may change due to the proposed action. The US is committed to providing financial assistance to the FSM to assist with provision of reasonable compensation for acquisition of private property interests by the FSM or Yap State. However, decisions and details on any potential real estate transactions are beyond the EIS process.
136	Email Comments	Yap State Government	Reef and Marine Ownership: In Yap, reefs are not publicly owned--they are owned and cared for by individuals, families, and communities, including rights to harvest certain species or use specific fishing methods. People depend on them for fishing, food, and income. DOD needs to identify who owns the reefs, who has use rights to the reefs, and who uses these areas so that the EIS can properly contextualize potential impacts. This will require DOD, using appropriate protocols, to speak directly with those affected. Any proposals must include fair compensation if fishing areas or resources are damaged and/or use rights impacted.	The DoD is working with the FSM and Yap government to coordinate with the individual local communities. A socioeconomic study will be conducted that will take into account many of the concerns stated here. This study will be included in the EIS analysis of impacts and include potential measures, if required, to avoid, minimize, or mitigate adverse impacts. The US is committed to providing financial assistance to the FSM to assist with provision of reasonable compensation for acquisition of private property interests by the FSM or Yap State. However, decisions and details on any potential real estate transactions are beyond the EIS process.

#	Source	Commenter Name	Comment	Response
137	Email Comments	Yap State Government	Ethnobiological Mapping with Traditional Knowledge Holders: The EIS must incorporate ethnobiological mapping conducted in partnership with traditional knowledge holders to complement scientific surveys and ensure culturally significant species and habitats are properly identified. This should be part of a broader effort to ensure traditional ecological knowledge is fully integrated into environmental analyses relating to the Project. Traditional ecological knowledge represents generations of detailed observations about seasonal patterns, species behavior, and ecosystem changes that cannot be captured through short-term scientific surveys alone. This process should engage elders, traditional fishers, and cultural practitioners to document traditional names, seasonal patterns, historical changes, and customary management practices. Traditional knowledge must be integrated with scientific data to create a more complete understanding of biological resources at risk and develop culturally appropriate mitigation strategies, while respecting traditional protocols for sharing knowledge and maintaining confidentiality if and as appropriate.	Your comments are noted and will be considered while developing the EIS. The purpose of the EIS process is to analyze the impacts of the proposed action on cultural resources and socioeconomic issues. The EIS will include a socioeconomic study, including setting up interviews with Yapese communities and traditional leaders, if available, to understand and assess potential impacts to traditional, cultural, and subsistence resources.
138	Email Comments	Yap State Government	Baseline Survey Inadequacies: Marine resource surveys conducted over only 10 days in April-May 2023 cannot adequately capture seasonal variations in reef health, fish abundance, spawning seasonality, and migratory species patterns. The manta tow methodology lacks resolution for detecting finer-scale impacts, especially in areas with poor visibility during outgoing tides. The EIS must implement year-round marine monitoring protocols, conduct monthly surveys across all seasons, employ multiple survey methodologies including diver-based transects and high-resolution underwater photography, and establish permanent monitoring stations for long-term data collection.	Details of the proposed action are still being developed and your comment will be considered while developing the EIS. The DoD has conducted a baseline survey of marine resources in the project area. The EIS will analyze potential effects on fishing grounds, establish best management practices to avoid or minimize potential impacts, and identify mitigation measures in instances where significant impacts are unavoidable.

#	Source	Commenter Name	Comment	Response
139	Email Comments	Yap State Government	Missing Habitat Assessments: No benthic or biotic transects were conducted in survey areas two, six, and seven. Surveyed areas did not encompass adjacent forereef, reef crest, reef flat, and inner reef environments that will be affected by disturbances. Surveys omitted vital mangrove ecosystems and seagrass beds along Tomil and Rull coasts. The EIS must complete comprehensive benthic transects in all areas within a 50-meter radius of proposed activities, conduct detailed habitat mapping of all adjacent reef environments, survey all mangrove and seagrass systems along affected coastlines, and establish habitat protection buffer zones.	The US DoD team appreciates the concern on level of assessment and as is required, will provide best available data. The navy is utilizing in-situ, existing, and satellite sets to adequately identify marine resources within and adjacent to the project footprint for a complete analysis of all potential effects. The DoD has conducted a baseline survey of marine resources in the project area. The EIS will analyze potential effects on fishing grounds, establish best management practices to avoid or minimize potential impacts, and identify mitigation measures in instances where significant impacts are unavoidable. A survey of mangroves likely to be impacted by the project will be conducted and reported in the EIS.
140	Email Comments	Yap State Government	Species Misidentified or Omitted: Several examples of species misidentification occurred, including identifying mangrove species not present in Chamorro Bay while missing five species that are present, and reporting only 2 seagrass species when 6-7 are actually present. The EIS must employ qualified marine biologists with specific expertise in Micronesian species, conduct verification surveys with local knowledge holders, establish species identification protocols using both scientific and traditional knowledge, and create comprehensive species inventories for all affected habitats.	The U.S. Navy has decades of experience in estimating and monitoring impacts of dredging and wharf construction on marine environments in Micronesia. The EIS would analyze the impacts of the proposed action on marine resources and would develop best management practices, or mitigations, if needed, to avoid or minimize adverse impacts in coordination with Yap and FSM resource agencies.
141	Email Comments	Yap State Government	At-Risk Species: Several culturally and ecologically significant species were identified, including Napoleon wrasse, humphead parrotfish, and Acropora coral. The report inaccurately stated there is a large population of reef manta rays; current research indicates the population is small and highly vulnerable. The EIS must conduct detailed population assessments for all culturally and ecologically significant species, develop species-specific protection measures, establish monitoring protocols for vulnerable populations, and treat IUCN-listed species and culturally significant species as equivalent to Endangered Species Act protection.	The EIS would analyze the impacts of the proposed action on marine and cultural resources based on best available and reliable data. Additionally, best management practices, or mitigations, if needed, to avoid or minimize adverse impacts would be developed in coordination with Yap and FSM resource agencies.

#	Source	Commenter Name	Comment	Response
142	Email Comments	Yap State Government	Yap Manta Ray Sanctuary: Reef manta rays led to the establishment of the first-ever Yap Manta Ray Sanctuary in 2008. Manta rays frequently feed and clean in the proposed Waneday Channel, believed to serve as a nursery site. As ram-jet filter feeders, they rely on clear water conditions; high sedimentation levels can hinder feeding efficiency. The EIS must acknowledge the existence of the Yap Manta Ray Sanctuary, conduct pre- and during-construction manta ray movement pattern studies, establish water quality standards that protect manta ray feeding efficiency, and implement construction timing restrictions during critical feeding periods.	The US Navy acknowledges the presence and need for the Yap Manta Ray Sanctuary to sustain healthy reef manta ray populations. The EIS will identify the Yap Manta Ray Sanctuary and presence of reef manta rays in Yap waters. The EIS will evaluate the potential impacts to water quality and the likelihood of impacts to manta ray habitat. The project will adhere to current Yap water quality standards as much as practicable. Best management practices, such as incorporating feeding and nursery seasons into project planning, and potential mitigation measures, if required, will be developed in coordination with Yap and FSM resource agencies to avoid, minimize, and mitigate unavoidable adverse effects on manta rays, and will be reported in the EIS.
143	Email Comments	Yap State Government	Rare and Unique Marine Habitats: A unique sea whip habitat was identified in June 2025 on the west side of Waneday Channel, characterized by a large expanse of sea whips. This ecosystem is significant due to its size and ecological functions but remains understudied due to limited resources. The EIS must conduct comprehensive surveys of the sea whip habitat and all unique marine ecosystems within the project area, establish protection zones around rare habitats, develop habitat-specific management plans, and provide funding for ongoing research and monitoring of understudied ecosystems.	Your comment will be considered while developing the EIS. Please provide a map and GPS coordinates for the sea whip habitat on the west side of Waneday Channel.
144	Email Comments	Yap State Government	Endemic Species Impacts: Long-term environmental degradation could affect endemic species including birds, flying foxes, and aquatic life. Habitat loss or transformation from construction activities must be assessed, along with threats from non-native species introduction via aircraft or construction equipment. The EIS must conduct comprehensive endemic species surveys, develop species-specific impact mitigation plans, establish habitat protection and restoration programs, and implement strict biosecurity protocols to prevent invasive species introduction.	The DoD has conducted a baseline survey of marine resources and will conduct terrestrial biological surveys in the project area. The EIS will analyze potential effects on endemic species, establish best management practices to avoid or minimize potential impacts, and identify potential mitigation measures, if required, where significant adverse impacts are unavoidable. Potential mitigation measures and biosecurity protocols will be identified in coordination with Yap and FSM resource agencies.

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145	Email Comments	Yap State Government	Mangrove Ecosystem Services: Mangroves provide critical feeding and nursery habitat for reef fish supporting both local food security and the tourism economy, stabilize shorelines, filter sediments, and protect coastal infrastructure from storm- generated waves. The Yinuf mangrove, one of Yap's largest and an important spawning ground, is vulnerable due to past impacts and current stressors. The EIS must assess ecosystem service values of all mangrove systems, develop comprehensive mangrove protection and restoration plans, establish monitoring protocols for mangrove health indicators including heavy metal contamination of soils, and implement adaptive management strategies to prevent "mangrove heart attack" scenarios.	The EIS will include an assessment of the project's potential impacts to mangroves. Best management practices and potential mitigation measures, if required, will be identified in coordination with Yap and FSM resource agencies to avoid, minimize or mitigate unavoidable adverse effects.
146	Email Comments		Mangrove Ecosystem Services: The Yinuf mangrove is also home to the largest fruit bat population on Yap. This fruit bat is indigenous to and only found in Yap. Damage to the fruit bat's habitat will have a negative impact on the fruit bat population, endangering the species and having a ripple effect on the ecosystem, reducing pollination and seed dispersal with negative impacts biodiversity. The EIS must address impacts on the fruit bat and its habitat, assess risks from invasive species introduction, and analyze how those impacts will further impact the larger ecosystem.	The EIS will include an assessment of the project's potential impacts to fruit bats. Best management practices and potential mitigation measures, if required, will be identified in coordination with Yap and FSM resource agencies to avoid, minimize or mitigate unavoidable adverse effects.
147	Email Comments	Yap State Government	National Historic Preservation Act Compliance and Process Development: The Task Force appreciates DOD's commitment to follow the NHPA consultation process during all phases of this project. However, the EIS must acknowledge that the NHPA consultation will need to proceed on a parallel track with the NEPA process to develop the necessary documents governing how cultural resources will be identified, evaluated, and protected throughout the project. This parallel consultation process must include meaningful engagement with traditional leaders, cultural practitioners, and affected communities to establish protocols that respect both federal requirements and traditional knowledge systems. We understand this is consistent with the way NEPA and the NHPA are implemented (*i.e* ., in parallel, with information developed in one process helping to inform the other) in the United States.	Title 54 USC § 307101(e) [formerly known as Section 402] of the National Historic Preservation Act is applicable to Department of Defense activities outside the United States. This provision directs DoD to take into account the effects of undertakings on properties listed in, or eligible for, the host nation’s equivalent of the National Register of Historic Places for the purpose of avoiding or mitigating any adverse effects. In this case, the DoD will consult with the Yap Historic Preservation Officer (HPO) on potential effects to historic properties. Consistent with Yap State’s recommendation, consultation under Title 54 USC § 307101(e) will proceed in parallel with the NEPA process, allowing each process to inform the other. This consultation will include meaningful engagement with traditional leaders, cultural practitioners, and affected communities to establish protocols that respect both federal requirements and traditional knowledge systems. In addition, the EIS will include a socioeconomic study and set up interviews involving the Yapese community and traditional leaders, if available, to assess potential impacts to traditional, cultural, and subsistence resources.

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148	Email Comments	Yap State Government	Submerged Cultural Resources: Yap's coastal waters may hold important cultural features like ancient fish traps and remnants of old harbor structures (and stone money). Some of these are already listed on the U.S. National Register of Historic Places, including sites near Waneday Channel where dredging is planned. These places are part of Yap's history and identity. The EIS must include a full underwater archaeological survey using tools like remotely operated cameras, protect these sites with buffer zones, and have clear plans in place to monitor and protect the sites during construction.	A baseline cultural resources survey for the project has already been conducted, which included remote marine sensing methods such as multibeam sonar, side scan sonar, magnetometer, and drop camera surveys. These surveys provide initial information to support the cultural resources impact analysis. The EIS will identify potential impacts to submerged cultural resources, including fish traps, harbor structures, and other culturally significant features, as well as sites already listed on the U.S. National Register of Historic Places. In coordination with the Yap Historic Preservation Office, additional consultation will help determine the most appropriate measures to avoid, minimize, or mitigate impacts. Pending the consultations, this may include the use of buffer zones, monitoring during construction, and other best management practices. Potential mitigation measures for any unavoidable impacts will be developed in consultation with Yap State representatives, traditional leaders, and cultural practitioners, and documented in the EIS.
149	Email Comments	Yap State Government	Ancestral and Archaeological Sites: Critical concerns exist regarding possible disturbance to ancestral burial grounds in proposed expansion areas, with no publicly disclosed protocols for identification, protection, or treatment. Areas around the airport may also include traditional platforms or foundations. Mangroves contain important archaeological areas including foundations from ancient homes and pathways used for travel and protection from enemies. These are unique, non- renewable resources. The EIS must include surveys of all these areas before any work begins, develop clear protocols for identifying and protecting ancestral sites, and have stop-work orders ready in case something is uncovered during construction. These protocols should be developed in consultation with interested parties in a manner consistent with the National Historic Preservation Act.	The EIS will address potential effects on ancestral burial grounds, traditional platforms or foundations, and archaeological resources including ancient house foundations and pathways. These are recognized as unique and non-renewable resources. Surveys of these areas may be part of the cultural resources investigation, in consultation with the Yap Historic Preservation Office and interested parties, and consistent with the requirements of Title 54 USC § 307101(e) [formerly known as Section 402] of the National Historic Preservation Act. Protocols for the identification, protection, and treatment of ancestral and archaeological sites will be developed as part of this process. These protocols will include mitigation measures for anticipated impacts and procedures for stop-work orders if unanticipated ancestral remains or archaeological resources are uncovered during construction. The development of these protocols will involve meaningful consultation with traditional leaders, cultural practitioners, and affected communities to ensure that both federal requirements and traditional knowledge systems are respected.

#	Source	Commenter Name	Comment	Response
150	Email Comments	Yap State Government	Cultural Practices and Resource Areas: Traditional fishing practices, resource collection rights, and customary use areas (fishing grounds, gathering areas) must be protected. The channel and surrounding ecosystems are used for small-scale, artisanal, and subsistence fishing, with community clam farms and nurseries for sea cucumbers and snails. The EIS must map all traditional use areas and resource collection sites, establish access protection measures during construction, develop alternative resource access arrangements where needed, and create community- based management agreements for shared marine resources.	The EIS will address reasonably foreseeable potential impacts to known traditional fishing practices, resource collection rights, and customary use areas, including artisanal and subsistence fishing grounds, clam farms, and aquaculture sites such as sea cucumber and snail nurseries within the project area or adjacent areas where impacts are reasonably foreseeable. These areas are recognized as important cultural and community resources As part of the EIS process, information provided regarding traditional use areas and cultural resource sites will be considered. Title 54 USC § 307101(e) [formerly known as Section 402] of the National Historic Preservation Act is applicable to DoD activities outside the United States and directs DoD to take into account the effects of undertakings on the host nation's equivalent of the National Register of Historic Places for the purposes of avoiding or mitigating adverse effects. Additionally, the EIS will include a socioeconomic study, including setting up interviews with Yapese community members and traditional leaders, if available, to assess potential impacts to cultural, subsistence, and livelihood practices.
151	Email Comments	Yap State Government	Mangrove Cultural Significance: Mangroves provide wood and thatch for traditional meeting homes (fa'luw) and canoes, as well as traditional medicine. These cultural uses represent both practical needs and spiritual connections to ancestral practices. The EIS must conduct comprehensive cultural assessments of mangrove use patterns, establish sustainable harvest protocols that protect cultural practices, develop alternative material sources where traditional sources are impacted, and create community-based mangrove management programs that integrate cultural and ecological objectives.	Thank you for your comment. The EIS will consider both cultural and heritage impacts as part of its analysis, consistent with the requirements of the National Historic Preservation Act, Title 54 USC § 307101(e) [formerly known as Section 402], and related consultation processes.
152	Email Comments	Yap State Government	Recording and Preserving Cultural Sites: If marine areas like coral reefs are going to be changed or lost, they should be properly documented. One way to do this is through high-resolution 3D images, which can preserve their appearance and importance for future generations. The EIS should include these visual records before any dredging or construction happens, and ensure they are archived in a way that the community can access. Educational materials and training programs should also be developed so local people can take part in documenting and monitoring these resources.	A baseline survey of marine resources has been conducted for the project. The EIS will analyze potential effects on marine resources, including coral reef habitats, and will identify best management practices to avoid or minimize potential impacts. Where impacts are unavoidable, potential mitigation measures will be developed in coordination with Yap and FSM resource agencies.

#	Source	Commenter Name	Comment	Response
153	Email Comments	Yap State Government	Impacts on Coastal Communities: Changes to the shoreline, such as dredging and modifying the channel, could seriously affect wave patterns and water flow--especially during typhoons, potentially increasing the risk of flooding and coastal erosion. The EIS must employ robust, science-based coastal modeling to understand these risks under both normal and extreme weather conditions, using the most conservative climate predictions available. The assessment should comply with relevant standards including ASCE 7, ASCE 24, and EM 1110-2-1100 (Coastal Engineering Manual).	The purpose of the EIS process is to analyze the impacts of the proposed action on environmental resources including geological and topographic resources, such as the impacts of dredging to the coast and wave direction and energy. In addition to the analysis of impacts on this resource, the EIS will include best management practices, standard operating procedures, or mitigations, if needed, to avoid or minimize adverse impacts on coastal communities.
154	Email Comments	Yap State Government	Watershed Protection: The area where the airport expansion is planned is part of the watershed that supplies drinking water to the Milew community and all communities south of the airport. It also supports the Yinuff mangrove system downstream. Any construction in this area could affect both water quality and flow. The EIS needs to clearly identify this risk and propose strong protections, including setting up buffer zones around the watershed, closely monitoring water quality during and after construction, and having backup water supply plans in place in case the current sources are compromised.	The EIS will describe the project's potential impacts on water resources and storm drainage, along with proposed design features, best management practices, and mitigation measures in the case of unavoidable adverse impacts.
155	Email Comments	Yap State Government	Hydrological Modeling Requirements: The EIS must clearly identify what runoff data and what models it used for hydrological and environmental modeling. All hydrology, plume dispersion, and sedimentation reports should be shared with the Task Force and made publicly available. Models must examine current and post-construction hydrological flow paths, accounting for both increased extreme rainfall events predicted for the future and drought conditions. The EIS must provide complete documentation of all data sources and modeling assumptions, make all technical reports publicly available online, conduct modeling scenarios that incorporate UN climate projections for extreme weather events, and establish protocols for model validation and adaptive management based on monitoring results.	Supporting studies will be included in EIS appendices and made available for public review along with the Draft and Final EIS documents. The EIS will be based on best available information.

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156	Email Comments	Yap State Government	Climate Change Integration: The 2023 Pacific Island Regional Climate Assessment indicates rising sea levels, intensified weather disturbances, and ocean temperature variations significantly impacting local ecosystems. The EIS must integrate the latest UN climate modeling data, use the higher values from either UN or U.S. projections for sea level rise and extreme weather events, conduct vulnerability assessments for all project components under future climate scenarios, and develop adaptive infrastructure designs that can accommodate changing climate conditions.	Per current DoD NEPA Implementing Procedures dated June 30, 2025, climate change is no longer considered in environmental reviews. However, infrastructure resiliency and the impacts of changing sea levels and storm intensity are still considered. Furthermore, the EIS will continue to evaluate the impacts of the proposed action on relevant environmental resources including marine resources and water quality, and include Best Management Practices , SOPs, or mitigation measures, if required, to avoid or minimize adverse impacts to applicable resources.
157	Email Comments	Yap State Government	Oceanic and Lagoonal Currents Analysis: Comprehensive analysis of larger oceanic and lagoonal movements is essential, focusing on how changes in channel size and composition can impact surrounding environments and interconnected waterway habitats. The EIS must conduct comprehensive current flow analysis using advanced oceanographic modeling, assess how channel modifications will alter regional water circulation patterns, evaluate impacts on nutrient transport and marine habitat connectivity, and develop monitoring systems for tracking changes in ocean and lagoon circulation. Such analysis must assess how the change in channel size and composition will impact the flow of water through the German channel, impact the mangroves protecting Tomil Harbor and the German channel, and determine if the water flow will impact the water quality in M'iil.	NEPA requires evaluation of reasonably foreseeable impacts a proposed action based on best available information, creation of new advanced oceanic current modeling goes beyond the requirements of NEPA. However, tidal and current data has been collected for analysis and the EIS will analyze the potential impacts of the proposed action on environmental resources such as marine and estuarine ecosystems and water quality. In addition to the analysis of impacts on this resource, the EIS will discuss best management practices, standard operating procedures, and potential mitigations, if needed, to avoid or minimize adverse impacts on these resources.
158	Email Comments	Yap State Government	Water Availability and Population Impacts: Construction and future operations will require a lot of water, possibly straining the local supply. The EIS needs to estimate how much water will be needed at every stage of the project, assess whether the current water system can handle it, and propose upgrades if not.	The EIS will identify construction and operational period water requirements and evaluate the potential impacts of these proposed needs to determine needed measures to avoid, minimize, or mitigate impacts to water the water system.

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159	Email Comments	Yap State Government	Plume and Sedimentation Impacts: Plume reports must incorporate advanced modeling techniques reflecting UN projections regarding climate change impacts. Analysis should focus on anticipated changes associated with extreme weather events and their effects on marine ecosystems and water quality. The EIS must employ advanced plume dispersion modeling that incorporates climate change projections, conduct real-time plume monitoring during construction activities, establish water quality thresholds that trigger construction modifications, and develop rapid response protocols for plume mitigation.	Per current US DoD NEPA Implementing Procedures dated June 30, 2025, climate change is no longer considered in environmental reviews. Additionally, US NEPA's scope of analysis is based on reasonably foreseeable impacts of the proposed project with reasonably causal relationship. However, the EIS has conducted a dredge plume modeling study and will continue to evaluate the impacts of the proposed action on relevant environmental resources including marine resources and water quality, and include Best Management Practices , SOPs, or mitigation measures, if required, to avoid or minimize adverse impacts to applicable resources.
160	Email Comments	Yap State Government	German Channel Impacts: One of the comments made during the scoping meeting was that the German Channel is the "lifeline" of tourism for Yap. Currently, it becomes inaccessible during low tide due to sedimentation. This will likely be· exacerbated by increased sedimentation from seaport dredging. The EIS must include comprehensive hydrological modeling of German Channel sedimentation patterns, assess cumulative impacts from seaport dredging on channel accessibility, develop specific mitigation measures to prevent channel obstruction, and establish maintenance protocols to ensure continued community access.	The DoD is conducting a dredge plume modeling study to determine potential impacts of the dredging to German Channel. The results of the study will be used to inform the analysis of impacts of dredging on the marine life and subsequently the tourism industry in the EIS and provide applicable Best Management Practices, SOPs, or mitigations, if needed, to avoid or minimize adverse impacts. Restoring environmental resources to a state that existed prior to existing conditions is beyond the scope of an EIS; however, such issues may continue to be addressed separately through U.S/FSM Joint Committee processes.
161	Email Comments	Yap State Government	Construction Noise: Building a new port and airport will involve heavy machinery, and much of the work may happen at night. That kind of noise--especially during sleeping hours--can affect people's health, disrupt daily routines, and lower quality of life in nearby villages. The EIS needs to set clear limits on how much noise is allowed during construction, especially at night. It should also include time restrictions to avoid disturbing communities during rest hours, and require monitoring and community notifications when loud work is scheduled. Noise barriers or quieter equipment should be used wherever possible.	The EIS will include a noise analysis addressing estimated construction and operational period impacts. Potential Best Management Practices to avoid or minimize impacts will be identified and assessed in the EIS.

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162	Email Comments		Construction Lighting: If construction occurs at night, artificial lighting will be needed, such lights are known to have a negative impact on the migratory behavior of particular species. The EIS must address the impact that such lighting will have on land crabs' migration at the full moon and on fruit bats and other nocturnal species.	The EIS will describe expected construction operations. If nighttime activities are proposed, the EIS will describe their associated impacts on biological resources and appropriate best management practices to avoid or minimize adverse impacts to sensitive and protected species.
163	Email Comments	Yap State Government	Aircraft Noise: Concerns about ongoing noise pollution from military aircraft operations must be addressed, including timing, number, and frequency of such activities and impacts on nearby communities, schools, and traditional gathering areas. This has been a significant issue for other projects in the region. The EIS must conduct comprehensive noise impact modeling for all aircraft operations, establish flight path restrictions to minimize community impacts, implement noise monitoring systems with real-time community notification, develop noise-sensitive facility protection measures, and create community compensation programs for noise impacts.	The EIS will include a noise analysis addressing impacts from aircraft operations. Potential Best Management Practices to avoid or minimize impacts will be identified and assessed in the EIS.
164	Email Comments	Yap State Government	Marine Life Noise Impacts: Underwater noise impacts during dredging operations and increased vessel traffic must be assessed for effects on marine species, particularly manta rays, whales, dolphins, and other sound-sensitive species that use the area for feeding, breeding, and migration. The EIS must conduct underwater noise impact assessments for all marine construction activities, establish noise thresholds that protect marine species' behavior and physiology, implement construction timing restrictions during critical biological periods, employ noise reduction technologies and techniques, and establish marine mammal monitoring and protection protocols.	An sound analysis was conducted for the project's expected in-water construction activities and its findings will be reported in the EIS. The EIS will identify appropriate Best Management Practices and potential mitigation measures, if required, in coordination with Yap and FSM resource agencies to avoid, minimize or mitigate unavoidable adverse effects.

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165	Email Comments	Yap State Government	Terrestrial Wildlife Noise Impacts: Noise impacts on bats, birds, and other terrestrial wildlife must be evaluated, particularly for endemic species such as the Yap flying fox and Yap monarch that may be sensitive to increased noise levels from aircraft and construction activities. The EIS must conduct species-specific noise impact assessments, establish noise limits that protect wildlife behavior and breeding success, implement temporal restrictions during critical wildlife periods, develop habitat-based noise mitigation measures, and create wildlife monitoring programs to track noise-related behavioral changes.	The EIS will evaluate the impacts of the proposed action such as noise impacts on important wildlife and biological resources and include Best Management Practices, or mitigation measures, if required, to avoid or minimize adverse impacts.
166	Email Comments	Yap State Government	Road Traffic and Infrastructure Impacts: The EIS must assess impacts of military exercises and increased operations at both the airport and seaport on local road infrastructure and traffic patterns. Military exercises will affect traffic and movement along the main airport road, which serves as a critical transportation corridor for local communities, while increased seaport operations will generate heavy cargo trucks, container transport vehicles, and construction equipment that place significant stress on roads not designed for such heavy use. The connecting road between the airport and seaport will experience particularly intense impacts from both facilities, potentially causing accelerated deterioration, structural damage, and safety hazards. The EIS must develop comprehensive traffic impact analysis including peak usage scenarios for both facilities, establish traffic management protocols that maintain community access, implement safety measures for mixed civilian-military-commercial traffic, identify road capacity limitations and upgrade requirements, establish road maintenance and repair protocols, create alternative transportation routes where needed, and develop emergency access protocols that prioritize community needs while accommodating both airport and seaport operations.	The EIS will include a traffic assessment and identify appropriate Best Management Practices and mitigation measures to address project-related impacts.

#	Source	Commenter Name	Comment	Response
167	Email Comments	Yap State Government	Maritime Traffic Increases: Increased ship traffic and accommodation of larger vessels will affect existing maritime transportation patterns, fishing vessel access, and traditional navigation routes used by local communities. The EIS must assess impacts on existing maritime traffic patterns, establish vessel traffic management systems that protect community access, develop safety protocols for mixed commercial-military vessel operations, create alternative navigation routes where traditional routes are impacted, and implement maritime safety training programs for local vessel operators.	The EIS will include a discussion of potential project-related maritime transportation impacts. Vessel management, establishing non-DoD safety protocols, creating alternative navigation routes, and local safety training programs are beyond the scope of the EIS or DoD's jurisdiction.
168	Email Comments	Yap State Government	Construction Vehicle Impacts: Heavy construction vehicle traffic will impact existing road infrastructure, create safety hazards for pedestrians and local vehicles, and potentially damage roads not designed for such heavy use. The EIS must conduct road capacity and condition assessments, develop construction traffic management plans that minimize community impacts, establish road repair and upgrade protocols, implement safety measures including signage and traffic control, create alternative transportation arrangements during peak construction periods, and develop long-term traffic management agreements that address both military and civilian use of airport facilities and access roads.	The EIS will include a traffic assessment and identify appropriate Best Management Practices and mitigation measures to address project-related impacts and insure that roads have the capacity to support construction. The construction contractor will be required to develop a construction management plan for road repair during construction to minimize impacts and ensure safety and will be required to repair impacted roads upon completion of construction.
169	Email Comments	Yap State Government	Flight Schedule Disruption Analysis: The EIS must assess the potential scale of disruption to current commercial flight schedules, including impacts on flight frequency, routing, and cost of flights to Yap. This analysis should evaluate how military exercises and operations will affect civilian aviation access, particularly for essential services like medical evacuations and cargo delivery. The assessment must include specific metrics on anticipated flight delays, cancellations, or rescheduling requirements, and propose mitigation measures to minimize impacts on community connectivity and economic activity dependent on reliable air service. Of course, this analysis (like others) will require disclosure of meaningful information about the number, timing, and frequency of military operations at and around the airport.	The EIS will evaluate the impacts of the proposed action on transportation including impacts to commercial flight operations and include Best Management Practices , SOPs, or mitigation measures, if required, to avoid or minimize adverse impacts.

#	Source	Commenter Name	Comment	Response
170	Email Comments	Yap State Government	Population Growth and Pressure on Resources: Bringing in large numbers of construction workers, military personnel, and support staff could put serious strain on Yap's limited and fragile resources--like housing, food, water, electricity, and health care. The EIS must look at how many people will come in during each phase of the project and how that will affect the island's resources. It should include plans to supplement those resources so local communities aren't left competing for basics like water or healthcare. Worker housing, water systems, and food supplies must be planned so they don't overload Yap's current resources.	The DoD will be conducting a socioeconomic study to establish baseline conditions and evaluate potential impacts of the proposed project on socioeconomic resources such as housing, economic activity, and public services. The results of the study will be used to inform the analysis of impacts on socioeconomic resources in the EIS and develop applicable Best Management Practices, SOPs, or mitigations, if needed, to avoid or minimize adverse impacts to the Yap economy. Additionally, the current proposed project includes identification of a potential area for construction of workforce housing to minimize potential impacts to the existing Yapese housing market. Finally, best management practices will be implemented during construction to reduce any potential impacts on socioeconomic resources.
171	Email Comments	Yap State Government	Cost of Living and Market Impacts: While DOD plans to construct barracks for workers, the EIS must assess economic impacts beyond housing on Yap's cost of living. We understand that other Pacific locations like Palau have experienced cost increases, including per diem rates, potentially related to increased military presence. Increased demand for food, fuel, utilities, and consumer goods could drive up prices significantly, making basic necessities unaffordable and/or unavailable for local residents. Support staff, contractors, and visiting personnel will compete with locals for hotel rooms, rental vehicles, and retail goods. The assessment must evaluate current market capacity for goods and services and project pricing impacts on residents. The EIS should propose mitigation measures such as dedicated supply chains that don't compete with local markets, price monitoring programs, and economic assistance to help families cope with increased costs.	The DoD will be conducting a socioeconomic study to establish baseline conditions and evaluate potential impacts to socioeconomic resources, such as supply and demand for food, consumer goods, fuel, etc. The results of the study will be used to inform the analysis of impacts on socioeconomic resources in the EIS and provide applicable Best Management Practices, SOPs, or mitigations, if needed, to avoid or minimize adverse impacts to the cost of living on Yap.
172	Email Comments	Yap State Government	Tourism Industry Risks: Tourism is a big part of Yap's economy, and the German Channel is central to dive tourism and manta ray viewing. If sediment from dredging blocks access to the channel or harms marine life, the tourism industry could suffer. The EIS must assess how the project could affect tourism and include plans to support tour operators and businesses. That could mean avoiding work during peak tourism seasons, creating new access points, or helping the industry recover after construction.	The DoD is conducting a dredge plume modeling study to determine potential impacts of the dredging to German Channel. The results of the study will be used to inform the analysis of impacts of dredging on the marine life and subsequently the tourism industry in the EIS and provide applicable Best Management Practices, SOPs, or mitigations, if needed, to avoid or minimize adverse impacts.

#	Source	Commenter Name	Comment	Response
173	Email Comments	Yap State Government	Impacts on Local Fishing and Food Security: Many people rely on small-scale fishing and aquaculture in places like the channel to feed their families and make a living. Dredging and construction could damage or destroy the ecosystems that support fish, clams, and sea cucumbers. The EIS needs to look closely at how this will affect people's ability to fish and propose solutions—like creating new fishing areas, restoring lost habitats, and offering support programs to help maintain food security, including providing gear or alternative sources of protein. Proposed solutions should address the long-term needs of the community.	Several studies have been and will be conducted to understand the nature of the material to be dredge and the impacts of dredging that material on the marine ecosystem. The results of these studies will be used to inform the analysis of impacts of dredging on the marine life and subsequently the tourism industry in the EIS and develop applicable Best Management Practices, SOPs, or mitigations, if needed, to avoid or minimize adverse impacts to the marine ecosystem and the local fishing and food resources.
174	Email Comments	Yap State Government	Jobs and Local Economic Opportunities: While construction could bring some job opportunities, the EIS should clearly explain whether and how local people will actually benefit. Will there be training? Will Yapese workers and businesses be prioritized? The EIS must include local hiring policies, training programs, and support for small businesses--like local suppliers and contractors. There should also be ways to track whether the community is truly benefiting economically from the project over time.	The purpose of the EIS process is to analyze the impacts of the proposed action on environmental resources including socioeconomic resources, such as the impacts to the job market and economy. Both positive and negative impacts are described in the EIS. In addition to the analysis of impacts on this resource, the EIS will include best management practices, standard operating procedures, or mitigations, if needed, to avoid or minimize adverse impacts on public health and safety.
175	Email Comments	Yap State Government	Procurement Timeline and Community Coordination: The EIS must provide projected procurement timelines for various project packages to allow community planning and preparation. This information is essential for local businesses to prepare for opportunities and for communities to plan for construction impacts and workforce housing needs.	The EIS will describe a general project timeline. Procurement process details will be addressed separately by the DoD and are outside the scope of an EIS.
176	Email Comments	Yap State Government	Healthcare System Strain: Yap's healthcare system is already limited. If hundreds of outside workers come to the island, it could overwhelm clinics and hospitals. The EIS needs to look at how much added pressure this will create and include plans to help--like expanding local facilities, bringing in extra medical staff, and improving emergency response systems during construction and operations.	The purpose of the EIS process is to analyze the impacts of the proposed action on environmental resources including public health and safety, such as the impacts to the current healthcare system. In addition to the analysis of impacts on this resource, the EIS will include best management practices, standard operating procedures, or mitigations, if needed, to avoid or minimize adverse impacts on public health and safety.

#	Source	Commenter Name	Comment	Response
177	Email Comments	Yap State Government	Preventing Disease and Promoting Public Health: A larger and more mobile population increases the risk of spreading diseases, including sexually transmitted infections and other public health concerns. The EIS should include health screenings for all incoming workers, as well as education programs about disease prevention. There should also be expanded access to reproductive health services and ongoing community health monitoring. The EIS must clarify whether all contractors entering Yap will be medically screened prior to arrival, and whether their medical records will be made available to Yap State for public health planning and safety purposes.	The purpose of the EIS process is to analyze the impacts of the proposed action on environmental resources including public health and safety. In addition to the analysis of impacts on this resource, the EIS will include best management practices, standard operating procedures, or mitigations, if needed, to avoid or minimize adverse impacts on public health and safety.
178	Email Comments	Yap State Government	Protecting Drinking Water: There's a risk that jet fuel, chemicals, or construction runoff could contaminate local water supplies. The EIS must include strong protections for water sources, such as regular water testing, prevention plans for spills and runoff, and backup systems in case contamination happens. Safe drinking water must remain available to the communities in Southern Yap at all times.	The purpose of the EIS process is to analyze the impacts of the proposed action on environmental resources including public health and safety and water resources. The benefits and risks associated with Fuel Storage will be analyzed. In addition to the analysis of impacts, the EIS will include best management practices, standard operating procedures, or potential mitigations, if needed, to avoid or minimize adverse impacts of fuel storage on public health and safety and water resources. Further, the FSM, the State of Yap, and the U.S. have agreed that the U.S. Government shall comply with standards substantively similar to those required by the Clean Water Act when constructing and using the military projects at the airport and seaport.
179	Email Comments	Yap State Government	Emergency Preparedness: With more people and more industrial activity, Yap will need stronger emergency response systems. That includes things like fire departments, disaster response, and medevac capabilities. The EIS should assess Yap's current ability to respond to emergencies and propose ways to strengthen it--such as new equipment, joint response plans with DOD, and training for local emergency teams.	The purpose of the EIS process is to analyze the impacts of the proposed action on environmental resources including public health and safety. In addition to the analysis of impacts on this resource, the EIS will include best management practices, standard operating procedures, or potential mitigations, if needed, to avoid or minimize adverse impacts on public health and safety. DoD acknowledges the importance of emergency preparedness. Strengthening capabilities beyond existing conditions is beyond the scope of an EIS; however, such issues may continue to be addressed separately through U.S/FSM Joint Committee processes.

#	Source	Commenter Name	Comment	Response
180	Email Comments		Cybersecurity and Critical Infrastructure Protection: The proposed increased military presence would create elevated cybersecurity risks for Yap's critical systems, including power grids, water treatment facilities, telecommunications networks, and transportation systems. The EIS must assess the vulnerability of Yap's existing critical infrastructure to cyber threats, evaluate current cybersecurity protections, and identify potential impacts on essential community services. The assessment should address how DOD will coordinate with Yap State authorities to enhance cybersecurity resilience, establish threat information sharing protocols, and develop incident response procedures. Given Yap's remote location and limited technical resources, the EIS should propose capacity-building measures and backup systems to maintain essential services during potential cyber incidents.	DoD is not proposing any significant long-term increase in military presence and the physical infrastructure DoD is constructing is not highly vulnerable to cyber-attack. The development of cybersecurity procedures and enhancement of cyber-security for Yap's utilities and critical infrastructure is beyond the scope of the proposed EIS; however, such issues may continue to be addressed separately through U.S/FSM Joint Committee processes.
181	Email Comments	Yap State Government	Invasive Species and Biosecurity: More movement of people and materials raises the risk of introducing invasive species--such as snakes, insects, or plant pests--that could seriously damage Yap's environment and agriculture. Because the Federated States of Micronesia (FSM) is not part of the United States, biosecurity measures that rely on screening cargo at points of departure within U.S. territories may not be effective or applicable here. The EIS must account for this and adopt strict, site-specific biosecurity protocols that reflect Yap's vulnerability. This includes thorough inspection of all cargo and personnel upon arrival in Yap, establishing physical barriers such as snake-proof fencing, and having rapid-response plans in place to contain and eliminate any invasive species that do arrive. The standard of care should be consistent with best practices used in highly biosecurity-sensitive nations like New Zealand. We note that current project plans do not seem to include any biosecurity infrastructure.	The purpose of the EIS process is to analyze the impacts of the proposed action on environmental resources and will include a discussion on invasive species. In addition to the analysis of impacts on this resource, the EIS will include development of best management practices, standard operating procedures, or mitigations, if needed, to avoid or minimize adverse impacts. The DoD employs biosecurity protocols in various locations around the world, which are specifically designed to account for risks at departure and arrival locations. Further, the FSM, the State of Yap, and the U.S. have agreed that the U.S. Government shall comply with standards as outlined in the COFA when constructing and using the military projects at the airport and seaport.

#	Source	Commenter Name	Comment	Response
182	Email Comments	Yap State Government	Community Safety and Social Concerns: An increased population may lead to more social challenges, including crime, prostitution, and other issues that Yap's legal and social systems may not be prepared to handle. The EIS must examine these risks and provide solutions--such as more support for law enforcement, expanded jail capacity, community safety programs, and access to social services like counseling or conflict resolution. The EIS must also clarify whether contractors will be accountable to Yap State laws, including traditional law and protocols, while residing and working in Yap, and if so, how this accountability will work procedurally, including jurisdictional authority, enforcement mechanisms, and coordination between military and civilian legal systems. Given the close proximity that the workers' barracks will have to local villages and schools, all foreign workers should be screened so that those with a criminal history, including sex crimes, are excluded from entry into the FSM.	The purpose of the EIS process is to analyze the impacts of the proposed action on environmental resources including public health and safety. In addition to the analysis of impacts on this resource, the EIS will include best management practices, standard operating procedures, or potential mitigations, if needed, to avoid or minimize adverse impacts which may include requirements for screening of contractor employees. Jurisdiction over United States contractors is outlined in Article XII of the SOFA.
183	Email Comments	Yap State Government	Wastewater and Sewage: With more people living and working on the island—especially during construction—there will be a big increase in wastewater and sewage. Yap's existing system may not be able to handle it. The EIS needs to look at how much additional waste will be produced, assess current system capacity, and include plans to build or upgrade treatment facilities. Temporary systems may also be needed for worker housing during construction.	The purpose of the EIS process is to analyze the impacts of the proposed action on environmental resources including utilities and infrastructure such as wastewater and sewage systems. In addition to the analysis of impacts on this resource, the EIS will include best management practices, standard operating procedures, or potential mitigations, if needed, to avoid or minimize adverse impacts.
184	Email Comments	Yap State Government	Water System Upgrade: More people using water for construction, housing, and day-to-day operations means greater demand on Yap's water system. The EIS must examine how much water the projects will need, whether the current system can support it, and what upgrades will be required. It should also include plans for water conservation, efficiency, and developing new water sources so that community needs aren't affected.	The purpose of the EIS process is to analyze the impacts of the proposed action on environmental resources including utilities and infrastructure such as water systems. In addition to the analysis of impacts on this resource, the EIS will include best management practices, standard operating procedures, or potential mitigations, if needed, to avoid or minimize adverse impacts.

#	Source	Commenter Name	Comment	Response
185	Email Comments	Yap State Government	Power and Electricity: Construction and new facilities will use a lot of electricity, possibly more than Yap's current power system can supply. The EIS must assess the island's electrical capacity and include plans for necessary upgrades. This could involve adding backup generators, using renewable energy sources like solar power, and improving energy efficiency in new buildings.	The purpose of the EIS process is to analyze the impacts of the proposed action on environmental resources including utilities and infrastructure such as power and electricity. In addition to the analysis of impacts on this resource, the EIS will include best management practices, standard operating procedures, or potential mitigations, if needed, to avoid or minimize adverse impacts.
186	Email Comments	Yap State Government	Solid and Hazardous Waste: Expanding the airport and port will generate more trash--including hazardous materials like fuel residues and construction waste. The EIS must include a full plan for handling all types of waste. That includes setting up proper disposal and recycling systems, monitoring waste output, and making sure hazardous materials are safely managed and transported. The EIS should address how all hazardous waste will be removed from Yap.	The purpose of the EIS process is to analyze the impacts of the proposed action on environmental resources including solid and hazardous waste. In addition to the analysis of impacts on this resource, the EIS will include best management practices, standard operating procedures, or mitigations, if needed, to avoid or minimize adverse impacts. Further, the FSM, the State of Yap, and the U.S. have agreed that the U.S. Government shall comply with standards substantively similar to those required by the Solid Waste Disposal Act when constructing and using the military projects at the airport and seaport.
187	Email Comments	Yap State Government	Telecommunications and Internet: With more people and increased military activity, there will be higher demand for phone, internet, and communication services. The EIS should look at whether the existing system can handle this, and if not, include plans to upgrade it. These upgrades should also help the community by improving access and reliability for local users.	The purpose of the EIS process is to analyze the impacts of the proposed action on environmental resources including utilities and infrastructure such as telecommunications and internet. In addition to the analysis of impacts on this resource, the EIS will include best management practices, standard operating procedures, or potential mitigations, if needed, to avoid or minimize adverse impacts.
188	Email Comments	Yap State Government	Port infrastructure: Changes to the seaport--like dredging or adding navigation aids--could affect how local boats and communities use the harbor. The EIS must look at these impacts, make sure changes won't block access, and plan for smooth transitions. This includes ensuring safety, supporting local transport needs, and upgrading community access points where needed.	The EIS will analyze any impacts to the local communities regarding access to the harbor and other waterways which will include evaluating impacts against baseline conditions and include relevant Best Management Practices, SOPs, or potential mitigations, if required, to avoid or minimize adverse impacts.

#	Source	Commenter Name	Comment	Response
189	Email Comments		Port Infrastructure: Prior to removing the foundations of the current ATONS, a survey should be done to assess whether the foundations contain corals and are being used as marine habitat. If current ATONS are being used as marine habitat, the EIS should address how those habitats can be preserved.	The EIS will include an assessment of impacts to biological resources, including biological resources on existing ATONs that are proposed for removal/replacement, and propose appropriate Best Management Practices and mitigation measures. Current plan is to minimize impacts to benthic environment and remove any hazards to navigation. Specifics of the design plans are still being developed, but the process may include placing the new ATON next to the existing ATON and cutting the existing ATON off at its foundation block (leaving foundation block in place) or in situations where foundations have no benthic growth, lift the existing foundation onto an adjacent barge and replace it with a new ATON (within the same footprint). Impacts to coral should be minimal except in several locations where coral has encrusted the foundations (like the outer channel markers).
190	Email Comments	Yap State Government	Roads and Transportation: Heavy trucks and construction vehicles will be traveling over local roads, which may not be built to handle that kind of traffic. The EIS must assess the condition of current roads, plan for repairs or upgrades, and propose ways to reduce wear and tear. It should also include traffic safety improvements, such as better signage and detours during construction. Yap State prefers cement roads over asphalt, as concrete performs better in Yap's environment, is easier to maintain, more cost-effective in the long term, and more environmentally friendly.	The EIS will analyze any impacts to roadway infrastructure which will include evaluating impacts against baseline conditions and include relevant Best Management Practices, SOPs, or potential mitigations, if required, to avoid or minimize adverse impacts. The project was developed and funding was programmed based on repairs to improve the existing asphalt road, the project does not include funding for new concrete roads and any significant use of concrete would require use of limited mitigation funds, decreasing capability for other mitigations. At this point, the US believes that asphalt remains appropriate for most areas although there may be some areas where concrete could be appropriate. The advantages of asphalt is that it is faster to install and repair than concrete, allowing for quicker reopening to traffic. Asphalt minimizes the risk of disrupting underground utilities due to its thinner layer, and it's easier to maintain with existing local repair practices. Asphalt is also more flexible for use in variable soil conditions and easier to dig up and repair, particularly where underground utilities require maintenance. As a result in most areas the US believes that asphalt is the most practical and cost-effective solution.

#	Source	Commenter Name	Comment	Response
191	Email Comments	Yap State Government	Pavement Material Selection and Longevity: During the scoping meetings, community members provided objective data and experience demonstrating that concrete pavement performs significantly better than asphalt in the local tropical environment over time. This preference is based on empirical evidence and practical· performance data, not emotional considerations as was incorrectly suggested during the meeting. The EIS must include a comprehensive analysis of pavement material options for all proposed road construction and improvements. This analysis should evaluate the long-term performance, durability, maintenance requirements, and lifecycle costs of concrete versus asphalt under Yap's specific environmental conditions, including high humidity, salt air exposure, extreme weather events, and heavy rainfall. The assessment should consider factors such as resistance to cracking, rutting, and deterioration; frequency and cost of repairs; environmental impacts of maintenance activities; and overall sustainability. Given the island's remote location and limited resources for ongoing road maintenance, the EIS should prioritize pavement solutions that demonstrate superior longevity and reduced maintenance needs based on documented local performance data. The analysis should also assess how different pavement materials perform under the anticipated heavy construction vehicle loads and subsequent military traffic, ensuring that material selection considers both short-term construction impacts and long-term operational requirements informed by Yap's actual experience with these materials.	The EIS will evaluate the potential impacts of the proposed action on transportation and roadways. The project was submitted to improve the existing asphalt road, and funding is allocated as such. The advantages of asphalt is that it is faster to install and repair than concrete, allowing for quicker reopening of roads to traffic. Asphalt minimizes the risk of disrupting underground utilities due to its thinner layer, and it's easier to maintain with existing local repair practices. Asphalt is also more adaptable to Yap's variable soil conditions, and potential for future repairs, making it the most practical and cost-effective solution.

#	Source	Commenter Name	Comment	Response
192	Email Comments	Yap State Government	Waste Survey and Management Enhancement: In accordance with FAA Advisory Circular AC 150/5320-15A, the EIS must include a comprehensive waste survey following Chapter 4 requirements to establish additional design waste loads due to projected expanded airport usage. This survey must identify all potential waste streams, recommend mitigation strategies for compliance, and establish waste management protocols that address both construction and operational phases.	Your comments are appreciated and will be considered in developing the draft EIS. The US DoD team will review the advisory to determine follow on actions, if any, required for intermittent airport use.
193	Email Comments	Yap State Government	Aircraft Emissions: Airport expansion to accommodate more frequent and larger aircraft will result in increased air pollution from jet fuel emissions. These emissions pose risks to adjacent agricultural areas and may affect local air quality standards. The EIS must conduct comprehensive air quality impact assessments, establish air quality monitoring systems, develop emission reduction and mitigation measures, assess impacts on adjacent agricultural areas and implement protection measures, and create air quality management protocols that meet international standards.	An air quality analysis will be conducted to support the EIS and would include evaluation of compliance with Yap and US CAA ambient air quality standards. Appropriate Best Management Practices and/or potential mitigation measures, if required, will be developed to avoid, minimize, or mitigate potential adverse impacts.
194	Email Comments	Yap State Government	Construction Dust and Machinery Emissions: Construction activities will create dust and release fumes from heavy equipment. These can harm air quality, especially in nearby villages or sensitive ecosystems. The EIS should include plans to control dust (like spraying water), limit engine idling, and monitor air quality throughout construction. It should also inform the community when higher pollution levels are expected and take steps to protect public health.	The purpose of the EIS process is to analyze the impacts of the proposed action on environmental resources including utilities and infrastructure such as water systems. In addition to the analysis of impacts on this resource, the EIS will include best management practices, standard operating procedures, or mitigations, if needed, to avoid or minimize adverse impacts.

#	Source	Commenter Name	Comment	Response
195	Email Comments	Yap State Government	Agricultural Impact Assessment: Following construction of Yap International Airport, residents reported a decline in citrus production. The EIS must study air quality impacts from increased airplane activity and fumes on betelnut, citrus fruit, and breadfruit--all important food sources and culturally significant plants. The EIS must conduct comprehensive agricultural impact studies including soil and plant tissue analysis, establish agricultural monitoring protocols, develop crop protection and mitigation measures, create alternative agricultural support programs, and implement long-term agricultural sustainability monitoring.	The purpose of the EIS process is to analyze the impacts of the proposed action on environmental and cultural resources including air and water quality, and socioeconomic issues. The EIS will also include best management practices, standard operating procedures, or mitigations, if needed, to avoid or minimize adverse impacts.
196	Email Comments	Yap State Government	Fuel Transportation, Storage, and Handling: Ground contamination from fuel and chemical runoff, potential spills, and fuel storage facilities must be assessed for impacts on air quality and surrounding environments. The EIS must develop comprehensive fuel storage and handling protocols, establish groundwater and soil contamination monitoring systems, implement spill prevention and response procedures, create environmental restoration protocols, and develop alternative fuel systems that minimize environmental risks.	The EIS will analyze the impacts of the proposed action including fuel storage and develop Best Management Practices, and SOPs such as a spill prevention plan that are in compliance with appliable regulations.
197	Email Comments	Yap State Government	Indoor Air Quality: New facilities and temporary housing must meet appropriate air quality standards and ventilation requirements, particularly important in tropical climate conditions. The EIS must establish indoor air quality standards for all facilities, implement appropriate ventilation and air conditioning systems, develop air quality monitoring protocols for occupied spaces, create health protection measures for occupants, and establish maintenance protocols for indoor air quality systems.	Details on the proposed construction designs are still being developed and will comply with regulations agreed upon between the US and FSM including for indoor quality requirements.

#	Source	Commenter Name	Comment	Response
198	Email Comments	Yap State Government	International Climate Commitments: The Federated States of Micronesia is a party to multiple international agreements on climate change and environmental protection, including the Paris Agreement under the United Nations Framework Convention on Climate Change. These treaties commit the FSM to reducing greenhouse gas emissions and safeguarding vulnerable ecosystems from climate-related harm. Any increase in activities such as military flights, maritime traffic, or fuel storage may contribute to emissions and environmental degradation that could undermine the FSM's treaty obligations. The EIS must therefore assess the potential impacts of the proposed activities on these international commitments and clearly identify measures to reduce emissions and offset any harm. This includes evaluating options such as limiting high-emission operations, integrating renewable energy solutions, and implementing carbon mitigation strategies in coordination with FSM's national climate goals.	Per current DoD NEPA Implementing Procedures dated June 30, 2025, climate change is no longer considered in environmental reviews. Although the US does not believe that its sovereign emissions should be attributable to the FSM, the EIS will, consistent with US law, evaluate the impacts of the proposed action on relevant environmental resources and estimate the project's potential level of greenhouse gas emissions. The EIS will also explore appropriate Best Management Practices , SOPs, or mitigation measures, if required, to avoid or minimize adverse impacts to applicable resources.
199	Email Comments	Yap State Government	Modeling Data and Report Sharing: The EIS must clearly identify all runoff data, hydrological models, plume dispersion analyses, and sedimentation studies used in impact assessments. The EIS must establish a comprehensive online data portal with all technical reports, modeling data, and analysis methodologies; provide data in accessible formats with clear documentation; implement version control and update notification systems; create community access training programs; and establish independent technical review processes.	Supporting studies will be included in the EIS appendices and made available for public review along with the Draft and Final EIS documents on a publicly accessible website
200	Email Comments	Yap State Government	Comprehensive Integration: A comprehensive synthesis of hydrology, plume, and sedimentation reports for both projects is essential, integrating oceanic and lagoonal current dynamics to accurately assess affected areas and habitats. The EIS must develop integrated assessment methodologies that combine all technical studies, create system-wide impact models that account for interconnected effects, establish cumulative impact assessment protocols, implement adaptive management systems that respond to integrated monitoring data, and develop holistic mitigation strategies that address system-wide impacts.	The EIS assessment process is designed to be comprehensive and integrated, using best available information, as it analyzes the reasonably foreseeable potential effects of the overall proposed action on environmental and cultural resources that make up the human environment and addresses best management practices, minimization measures, and mitigations, if required, to avoid and minimize adverse impacts on those resources.

#	Source	Commenter Name	Comment	Response
1	Scoping Meeting (Oral)	Kathe Burch	How many individuals commented during the first round of public scoping meetings?	Approximately 28 individuals provided comments during the first round of public scoping meetings, and about 200 unique comments were provided.
2	Scoping Meeting (Oral)	Joseph Urusemal	Concern about US ability to support and defend Yap if its hit by multiple disasters.	DoW can manage multiple events (e.g., Lahaina wildfires and Hurricane Mawar responses; runway and seaport improvement will allow for larger aircraft and ships to provide disaster relief.
3	Scoping Meeting (Oral)	John Mafel	Yap is in typhoon alley – how can US respond if USAID is disbanded and FEMA has been broken up? Look at how North Carolina flood victims were treated.	The functions that USAID previously performed in the region are now carried out by the U.S. Department of State. The Department of War, through INDOPACOM, remains fully postured and prepared to respond to requests for assistance during typhoons and other natural disasters.
4	Scoping Meeting (Oral)	Joseph Urusemal	Change from DoD to DoW is very concerning; FSM residents were rounded up in the recent Georgia ICE crackdown even though they are lawfully allowed in the US; even Chicago is being treated poorly; general concern about direction US is taking and the durability of the FSM/US partnership. Recent changes with tariffs have created issues with mailing packages to the U.S. Recent Armed Services Committee CODEL tour bypassed FSM – how serious is the US commitment?	The United States remains firmly committed to the Compact and to our close relationship with the FSM. We work collaboratively with the FSM and Yap to resolve any areas of concern. In addition to our frequent meetings with officials from Yap State and the FSM national government, FSM Ambassador Soram and his team are doing a good job in communicating FSM concerns in Washington DC.
5	Scoping Meeting (Oral)	John Mafel	Has the decision to use concrete or asphalt for roadways been decided yet? When will we learn the end state plan?	The design team evaluated the pros and cons of using asphalt and concrete, and asphalt was determined to be slightly more advantageous. Discussions continue to come to a final decision regarding which option will be used. Regardless of material, the roadways will be constructed based on projected traffic loadings to meet the design life.
6	Scoping Meeting (Oral)	Name not redorded	Will the sustainment and maintenance budget for the improvements include Ganir Bridge?	No, Ganir Bridge is being constructed under an FSM National and or Yap State contract, and is not expected to be part of the requested Defense Site, and would, therefore, not be eligible for DoW sustainment funds. The sea port Contractor would be required to repair the bridge if its use of the bridge damages it.
7	Scoping Meeting (Oral)	Name not redorded	Need to ensure the Airport is fully FAA compliant.	The proposed airport improvements will all be done to ensure the completed airport is FAA compliant.
8	Scoping Meeting (Oral)	Name not redorded	Will the U.S. Government contribute to airfield maintenance costs once improvements are in place?	Further discussions and negotiations will be needed. However, it is in the interest of the U.S. Government to ensure that its investments are maintained. The U.S. Government can seek sustainment funds to assist with maintenance of Defense Sites and expects to contribute toward operation and maintenance of the Defense Sites.

#	Source	Commenter Name	Comment	Response
9	Scoping Meeting (Oral)	Name not redorded	Who signs off on the earthmoving permit? And how can compliance with permit conditions be enforced?	FSM/Yap agency may serve as the applicant, the US government cannot apply for permits. However, regardless of whether there is a permit, the U.S. government will require the contractor to comply with substantive environmental requirements and is working with the FSM and Yap State Governments to develop an appropriate process to ensure compliance. Contractors are required to be insured and will need to fix any errors they make; ROICC and supporting staff will be on the ground to enforce rules.
10	Scoping Meeting (Oral)	Kathe Burch	The sports complex is used for major community events (e.g., Yap Day). Will there be architectural standards for the planned mancamp at the sports complex to minimize visual/aesthetic impacts? Can you ensure there will be no ground water contamination there?	Based on discussions with local stakeholders, the U.S. understands that there is a strong preference to avoid using the site directly across from the sports complex for the mancamp. Two alternative sites provided by the Yap Government located to the southeast appear favorable as they are further away from the sports complex and help minimize visual and aesthetic impacts. The site on west side of the main road (Site C) is probably more preferrable due to proximity to utilities and prior use, but the Contractor may decide to use both parcels. Contract specifications will include controls on any activity that could impact groundwater resources.
11	Scoping Meeting (Oral)	Kathe Burch	The sports complex site spans two municipalities (Gagil and Tamil).	Thank you for the clarification. The design team is working with Yap Department of Land and Resources to determine where the Gagil/Tamil boundary falls relative to the sports complex and the parcels of land under consideration for potential contractor use.
12	Scoping Meeting (Oral)	Name not redorded	Yap State is considering shifting the road that now bisects the FMI campus around the south side of the campus to minimize disturbance to the campus; can the US include this in its sports complex area plans?	The purpose and need for the project does not require relocation of the road to meet mission need, so road relocation cannot be legally justified for direct inclusion into the project. Therefore, it will not be included as an alternative in the EIS. If relocation of the road to offset potential impacts caused by the project is a high priority, the U.S. recommends that the Yap Task Force communicate this request to the U.S. in writing.
13	Scoping Meeting (Oral)	Julie Hartup	Is there a plume modeling report available to review? What were the modeling assumptions, only short-term data or broader range? Need to ensure there was due diligence.	The seaport hydrodynamic study (referred to here as plume modeling) is underway using the verified and calibrated metocean data. The modeling framework, inputs, and outputs are based on state of the art, peer-reviewed industry standards and presents a variety of case results, including mitigation measures. The U.S. Government arranged for a brief by the coastal engineer leading the study for the FSM and Yap State Government and their scientists and provided a copy of the brief to the FSM and Yap State Governments. The report will be shared with the FSM and Yap State Governments once it is complete.

#	Source	Commenter Name	Comment	Response
14	Scoping Meeting (Oral)	John Mafel	How will the construction contractor be selected?	We will use “best value approach which allows flexibility to select a Contractor that has good experience and will do the best job. We hope to host a networking event with the Prime and Yap contractors in the near future, details are still being worked out.
15	Scoping Meeting (Oral)	Name not redorded	Where are we at with the Operational Control Letter (OCL)?	The March 2025 OCL and the EIS are separate but related processes. The OCL is the instrument that allows DoW interim access to public lands prior to the establishment of a Defense Site. The OCL also provided timelines for the commencement of the EIS public scoping process. The public scoping meetings required under the OCL have been conducted. The EIS analyzes the proposed project, its potential impacts to the environment and required mitigation.
16	Scoping Meeting (Oral)	Kathe Burch, Julie Hartup	Can we place all reports used in the analysis of the EIS in a repository to make available for the Yap Scientists and Yap community?	The DoW will reference all information that is used in the EIS analysis and will make information available to Yap State. Ownership/publication/distribution restrictions may restrict the DoW from providing some documents.
17	Scoping Meeting (Oral)	Kathe Burch	When the FSM grants a group access to conduct research, there is a requirement to share the findings and data back with the FSM, but that doesn’t always happen.	The DoW is committed to providing all data collected and analysis conducted in support of the EIS. SOPs are being developed to guide data sharing protocols.
18	Scoping Meeting (Oral)	Ryan James	What does “NEPA” stand for?	National Environmental Policy Act
19	Scoping Meeting (Oral)	Shof	Are there portions of NEPA that have been overturned/invalidated within the past nine months?	While the NEPA was amended in 2023, the main focus on informed decision-making with public coordination remains. There have been changes in how NEPA is interpreted (supreme court decisions), rescission of the Council on Environmental Quality (CEQ) regulations implementing NEPA and DoW has provided the military services with implementing procedures in place of those prior regulations. Additionally, the COFA requires the U.S. to follow NEPA as if in the United States and apply substantially similar standards for certain COFA listed U.S. laws. The United States is coordinating with FSM to establish those appropriate substantially similar standards.

#	Source	Commenter Name	Comment	Response
20	Scoping Meeting (Oral)	Kathe Burch	Will we be doing 1-2 exercises per year per site (airport and seaport) or 1-2 exercises per year total that involve both the airport and seaport?	There will be 1-2 exercises per year total. The exercises may involve both the Airport and Seaport (e.g., logistic support from Seaport for Airport exercises). There may also be exercises that involve only the airport, or more rarely only the seaport.
21	Scoping Meeting (Oral)	Ryan James	Will these exercises have live ordnance?	There are no plans at this time for live fire exercises on Yap. If this were to change in the future, it would only be done in close coordination with Yap State and additional environmental analysis. DoW ships and aircraft may carry ordnance as part of training exercise – but no intent to discharge ordnance or store in warehouses in Yap. DoW may practice setting up weapons systems (e.g., Patriot defense system) for training purposes only (no live fires).
22	Scoping Meeting (Oral)	Leevin Camacho	Would the NEPA EIS be restarted or supplemented if the U.S. DoW decided that it wanted to start live fire exercises?	The EIS would not be restarted, but another or supplemental NEPA process would be initiated to analyze the new proposed action (i.e., live fire training, increase in the number of annual training exercises). Any decision to consider live fire exercises would be coordinated with the FSM National and Yap State Governments.
23	Scoping Meeting (Oral)	Kathe Burch	How will the salaries of the off-island workers compare to the salaries of the current Yapese labor rates?	The contracts will include language to make sure the contractor pays at least a competitive local wage to all workers (foreign and Yapese).
24	Scoping Meeting (Oral)	Ryan James	Are there permanently stationed soldiers proposed for Yap?	No, permanently stationed soldiers or other service members on Yap is not part of the proposed action. The Seabees who are already on Yap is not a new action and their presence will not be included in the evaluation of the EIS.
25	Scoping Meeting (Oral)	Ryan James	If the U.S. wants to get more kinetic in the region, will the U.S. government involve the Yap community?	The U.S. DoW would coordinate with Yap State well in advance of any proposed exercises and would conduct additional environmental analysis as necessary.
26	Scoping Meeting (Oral)	Ryan James	What kind of fixed-wing aircraft could be brought in?	All fixed wing aircraft within the DoW inventory could potentially be landed in Yap.
27	Scoping Meeting (Oral)	Shof	What kind of ships does the U.S. plan on bringing into the Yap Port?	The U.S. would not bring in an aircraft carrier because it is too large. All ships smaller than an aircraft carrier could potentially visit Yap Port including cruisers, destroyers, and T-AKE (supply ships). Those ships are approximately 500 – 700 feet in length.
28	Scoping Meeting (Oral)	Ryan James	Is the U.S. planning on repairing ships in the Yap Port?	No. The Yap Port will not be set up to perform major maintenance or repair on ships. Ship's crew may need to perform minor repairs from time to time but appropriate standard operating procedures would be in place to not impact the environment.

#	Source	Commenter Name	Comment	Response
29	Scoping Meeting (Oral)	Name not redorded	How will Navy ship port visits affect port operations and movements of other ships and vessels? Will access be restricted around ships when the U.S. military brings them into the Yap Port?	As required by the COFA, the U.S. would not impact the ability of Yap State to effectively operate its port, so port operations would be maintained during port visits and exercises. Approximately one week before a port visit, the Navy would release detailed plans and conduct detailed coordination with Yap State and commercial operators including port operators, cargo ships, dive boats, fisherman, etc. A secure perimeter would be set up around the visiting Navy ship, clearly demarcated with navigation buoys.
30	Scoping Meeting (Oral)	Viliame Lagonilakeba	Why has Yap been chosen for the airport and seaport project?	The U.S. and FSM/Yap State are close allies and partners, and the COFA establishes the U.S. as the defense for the FSM. Yap is strategically located within the second island chain arc running between Pagan in CNMI and Angaur in Palau, and establishing more lines of logistic and communications capabilities in this area will increase deterrence and increase the capacity of the U.S. to respond to natural disasters in the region. Yap is an appropriate location where expansion of logistics capacity will serve both defense and humanitarian purposes, expanding the U.S. capabilities to protect Yap and the FSM.
31	Scoping Meeting (Oral)	Ryan James	For the types of training that the U.S. is proposing to conduct, is Valiant Shield a good example?	Valient Shield is a biennial, multinational field training exercise in the Indo-Pacific region focused on improving the interoperability of U.S. and allied forces in a multi-domain environment. It's conceivable Yap seaport and airport facilities could support some of the Valient Shield activities.
32	Scoping Meeting (Oral)	John Rulmal	Why am I feeling guilty about all these projects? The U.S. is willing to improve our port and seaport, but it’s not clear why? What benefits do these projects have for the U.S.?	The U.S. and FSM/Yap State are close allies and partners, and the COFA establishes the U.S. as the defense for the FSM. Yap is strategically located within the second island chain arc running between Pagan in CNMI and Angaur in Palau, and establishing more lines of logistic and communications capabilities in this area will increase deterrence and increase the capacity of the U.S. to respond to natural disasters in the region. Yap is an appropriate location where expansion of logistics capacity will serve both defense and humanitarian purposes, expanding the U.S. capabilities to protect Yap and the FSM. The Yap Airport and Seaport are in need of major repairs and modernization to ensure that the U.S. can provide proper deterrence and defense.
33	Scoping Meeting (Oral)	Name not redorded	Will the EIS address potential noise pollution from the proposed airport improvements and new aircraft?	Yes, potential noise impacts from construction and operations at the seaport and airport will be addressed in the EIS. A noise subject matter expert will generate a technical noise report that evaluates the short-term construction noise and proposed aircraft noise. The EIS will include a discussion of potential impacts, best management practices, SOPS, or mitigations, if needed, to avoid or minimize potential adverse impacts.

#	Source	Commenter Name	Comment	Response
34	Scoping Meeting (Oral)	Name not redorded	Will the EIS address solid waste handling?	Yes, the EIS will evaluate the potential impacts of the proposed construction and training on solid waste resources and will identify management procedures, including compliance with the substantive requirements of the Solid Waste Management Act of the U.S.
35	Scoping Meeting (Oral)	Name not redorded	How will roads and traffic be impacted?	There will be impacts to traffic associated with construction vehicle traffic, which will be analyzed in the EIS and include best management practices, SOPS, or mitigations, if needed, to avoid or minimize adverse impacts.. The road between the seaport and airport will be maintained throughout construction and repaved upon construction completion.
36	Scoping Meeting (Oral)	Viliame Lagonilakeba	Are these questions being recorded?	Yes, the EIS team took hand written notes at the public scoping meetings. (The meetings were not recorded electronically)
37	Scoping Meeting (Oral)	Name not redorded	How many people will be on the island during the exercises?	Exercises may bring approximately 200 individuals per event, not including Seabees that may already be here working on other construction projects.
38	Scoping Meeting (Oral)	John Rulmal	Does a NEPA analysis include social impacts?	Yes, the EIS will include an assessment of socioeconomic impacts and identification of avoidance, minimization, and mitigation measures to address potential impacts. These may include income, housing, agriculture, and items/locations of religious our cultural practices.
39	Scoping Meeting (Oral)	Kathe Burch	The road labeled in orange goes through a village and is very close to homes—will there be heavy equipment going through that road? I am concerned about the safety of the people and children in that village.	The road will be utilized by dump trucks to transport dredged/soil material. The contractor will be subject to defined hours of operation and subject to strict enforcement of local laws including maintaining low speeds. Contractor will be subject to adhering to safety protocols such as regular equipment/vehicle inspections, permitting only qualified personnel operating the equipment, use of spotters and backup alarms in areas of low visibility, restrictions of operation during extreme weather, and immediate incident reporting. Additionally, the EIS process will analyze the impacts of the proposed action on environmental resources, including public safety, and will require any additional Best Management Practices not mentioned above and or mitigations, if needed, to avoid or minimize adverse impacts.
40	Scoping Meeting (Oral)	Julie Hartup	What model was used to develop the erosion control figure in the description and overview section of the potential airport projects? Did the model incorporate the need for mangroves to get an appropriate amount of silt (not too much, not too little)?	Site specific NOAA rainfall data collected for the Yap Airport was used . Hydrology calculations were done using a locally calibrated unit hydrograph spreadsheet and the Rational Method. Water quality and Detention Ponds/Outlet structures used the Modified Puls method and stage/storage tables. We will prepare a presentation of drainage and erosion control design and present during the next Design Review.

#	Source	Commenter Name	Comment	Response
41	Scoping Meeting (Oral)	Julie Hartup	Has the design team determined the species of grass that will be used in the erosion control measures?	The U.S. team has identified some potential species and is working to confirm the options with Yap State, FSM, and regional experts to choose species that maximize erosion control while avoiding the introducing of an invasive or weedy species.
42	Scoping Meeting (Oral)	Julie Hartup	What storm model was used in the analysis for the erosion control plan, and did it account for a sequence of back-to-back storms?	In general, the detention ponds are designed to drain within 48 hours, and they would represent an improvement over the existing drainage system. All ponds are designed to discharge a 100-year event through the outlet structure. Note design criteria requires a 25-year event but a 100-year event was used due to concerns with drainage from 2023 site visit. For added safety, the outlet structure is designed assuming that it is half clogged with debris. Emergency spillways are provided which are designed to be stable in the 100-year event. If a back to back event occurred the drainage design should be able to handle the event. Spillways are also provided at all detention basins to release any added flow. This means ponds could be full from a major storm, and if a subsequent storm occurs, the ponds would likely overflow through the stabilized emergency spillways and into the receiving waters downstream. A spreadsheet developed by the Mile High Flood District in Denver, CO was used for detention and water quality pond modeling. This is an all inclusive hydrological model based on a scaled hydrograph, using site-specific rainfall data. Hydrograph routing was performed by the Modified-Pulse method for a variety of configurations. Storm water conveyance modeling was conducted using in-house spreadsheets for hydrological calculations based on the Rational Method as well as in-house spreadsheets for hydraulic calculations involving inlet, channel and energy dissipation design. StormCAD software was used for pipe network design.
43	Scoping Meeting (Oral)	Julie Hartup	Were the stormwater detention ponds designed to prevent mosquitos? There is concern that these ponds will be a breeding ground for mosquitos that carry dengue, chikungunya, and other mosquito-borne diseases.	Center for Disease Control, World Health Organization, and other public health sources recommend draining water sources once a week to prevent mosquitos from breeding. The drainage treatment system is designed to drain within 48 hours after rainfall events.

#	Source	Commenter Name	Comment	Response
44	Scoping Meeting (Oral)	Name not redorded	Will the stormwater improvements remain once construction is complete? If so, how will they be maintained?	The permanent improvements will remain in place after construction (e.g., swales, culverts, detention basins, etc.). If the areas are included in the defense site agreement, they would become eligible for earning sustainment funds which could be used to contribute toward maintenance. The U.S. DoW would work with Yap State and the FSM to develop appropriate operating and maintenance agreements to ensure projection of the U.S. investment in airport improvements. In general, the improvements are designed to be simple to maintain (i.e., no specialized labor or construction equipment).
45	Scoping Meeting (Oral)	Julie Hartup	Will the impacts of increased jet fuel pollution be analyzed? Fumes may adversely impact citrus fruit in the vicinity of the airport.	The EIS will include an analysis of potential impacts to air quality from increased use of jet fuel as a result of increased training, the EIS will also discuss the possibility of spills associated with increased activities and fuel storage at the airport and appropriate spill prevention and control measures .
46	Scoping Meeting (Oral)	Julie Hartup	Will the DoW be conducting further studies and is there enough time to study everything that is needed for the EIS?	The U.S. DoW has been conducting baseline environmental studies since 2023 and are conducting additional studies to inform the EIS analysis including studies on socioeconomic, wetland & mangrove, traffic, noise and air quality. Additionally, the project team has been and will continue to compile the best existing data to establish an appropriate environmental baseline and conduct the environmental impact analysis. NEPA is based on the principle of using the best available data to make an informed decision considering reasonably foreseeable environmental effects of the proposed action.
47	Scoping Meeting (Oral)	D'Amy Steward	Given the EIS timeline, it is not possible to collect a full years' worth of data/measurements. How will the analysis account for seasonal variation?	Metocean data collection in the harbor included a full years' worth of data. For other data, the EIS will consider the baseline studies that have been conducted as well as other best available data/information as required by NEPA.
48	Scoping Meeting (Oral)	D'Amy Steward	What were some of the data gaps that the DoW attempted to fill with the baseline surveys that were conducted?	The baseline surveys were resource specific and included marine biology, terrestrial biology, and marine and terrestrial cultural resources at the seaport, as well as terrestrial biology and cultural resources at the airport. Additionally, a range of data collection and analyses (metocean data, sediment plume modeling, hydrologic modeling, etc.) were conducted to inform design and will be included in the environmental analysis. There are also additional studies underway including for socioeconomic, wetland & mangrove, traffic, noise and air quality.

#	Source	Commenter Name	Comment	Response
49	Scoping Meeting (Oral)	Julie Hartup	The baseline surveys were not sufficient and additional surveys should be conducted.	The baseline surveys were conducted in line with standard practices that would be used for similar efforts within the U.S. to support EIS analyses. As prescribed by NEPA, the baseline studies are not required to be comprehensive but instead are intended to supplement the best available information and data to inform analysis of reasonably foreseeable environmental effects of the proposed action and inform decision making .
50	Scoping Meeting (Oral)	Leevin Camacho	Why is September 1 the deadline for the Record of Decision? And what happens if that date is not met?	The September 1 deadline is intended to meet the operational deadline required to initiate construction in time to have the improvements fully operational within the timeline required by the DoW. Additionally, the September 1 deadline will keep the project on track to retain and potentially receive funding through the U.S. federal budgeting process. There is urgency to protect against regional threats and to obtain funding while Congressional interest in the region is high.
51	Scoping Meeting (Oral)	Leevin Camacho	Has the budget funding been assured?	Some of the funding for the airport project has been authorized allowing the U.S. to award the contract as long as the finding remains available and a contract offer comes in within the amount authorized. The funding for the seaport project is in the U.S. President's budget request for fiscal year 2027. This funding request needs to be approved by Congress. Funding is never assured, projects can and have been cancelled prior to award based on changing Executive and Congressional priorities even after being initially authorized by Congress, however, once authorized there is a high probability that funding will remain available if the project stays on track.
52	Scoping Meeting (Oral)	Kathe Burch	Is the expedited nature of the EIS at odds with the Yap resident’s constitutional right to a clean/safe environment?	The EIS process is to allow for informed decision-making with input from the public. The analysis will consider the appropriate standard operating procedures and necessary mitigation to reduce effects of the construction and operations of the proposed action. The Draft EIS will be presented to the people of Yap for comment and review. The United States respects the Yap resident's right to a clean and safe environment.
53	Scoping Meeting (Oral)	John Rulmal	How will the EIS consider secret, traditional knowledge?	The EIS will use information collected through a socioeconomic study conducted in coordination with the Council of Pilung (traditional leaders), the Yap HPO, and the Yap State Task Force. Where possible, the study included interviews with residents and key community members as instructed by Yap stakeholders. Reporting requirements/sensitivities were discussed and agreed to by the Yap stakeholders who participated to understand what type of information is not desired to be released in the EIS. Impacts analysis will be evaluated using the information provided but without explicitly describing the sensitive information.

#	Source	Commenter Name	Comment	Response
54	Scoping Meeting (Oral)	John Rulmal	How will the EIS be written in a way the Yapese public understands?	The EIS will include the analysis and findings required under NEPA, but the intent is that it is written in layman's terms as much as possible. The EIS will include an executive summary that will provide a summary of the analysis and findings. Additionally, another round of public meetings will be held during the Draft EIS review period, and those meetings could include a presentation on the analysis and findings in the EIS and provide opportunities for the Yapese community to ask questions.
55	Scoping Meeting (Oral)	Shof	Why does OCL only cover public lands and not the private lands?	The OCL was granted by Government of Yap State through the FSM and is limited to lands over which Yap State has authority to grant access and use rights.
56	Scoping Meeting (Oral)	Shof	The lands underwater are privately owned.	Understood. The project team is working with the Yap State Task Force and affected municipalities to determine ownership of submerged lands and fishing rights of proposed dredge areas and evaluate requested mitigation and compensation.
57	Scoping Meeting (Oral)	Name not redorded	When would the industry day that Earl Estrella discussed be held?	Current plans are to host the Industry Day in CY26
58	Scoping Meeting (Oral)	Shof	What improvements would be done to Mulroo Bridge?	The roadway will be raised to make it less vulnerable to flooding and the culvert will be appropriately sized based on the engineering analysis.
59	Scoping Meeting (Oral)	John Mafel	Is there a process to address issues that arise that we don't anticipate now during the EIS?	When the Draft EIS is released in 2026, the public will have another opportunity to review and comment on the EIS and bring up any additional concerns during the EIS Commenting Period. The US DoW can also deal with unanticipated events through contingency budgets and change orders; additional issues not captured in this EIS may trigger additional NEPA analysis, which would be a separate effort.
60	Scoping Meeting (Oral)	John Mafel	Will the contract have contingency funds to make changes if needed?	Yes, military construction projects typically include a contingency line item that is available for minor project changes and post award contract modifications.

#	Source	Commenter Name	Comment	Response
61	Scoping Meeting (Oral)	Julie Hartup	What if we model the plume and it's bigger than we expected?	Proposed BMPs will include monitoring by a trained individual during dredging operations to ensure turbidity plumes are contained within designated zones. Turbidity monitoring buoys will be deployed around the perimeter of each dredging operation that will alert monitors if Total Suspended Solids (TSS) exceeds an approved threshold which will trigger a shut down of the dredging operation until TSS has dropped below the agreed threshold. This protocol will ensure that sedimentation and turbidity effects are contained with an agreed upon perimeter.
62	Scoping Meeting (Oral)	John Rulmal	Is it possible for Yap State to get caught between a dispute between the U.S. Government and the contractor to resolve an issue that arises regarding an impact?	No, Navy and contractor are bound by contract terms.
63	Scoping Meeting (Oral)	Kathe Burch	Will the contractors be required to ensure their workers are following Yap laws and customs?	The Status of Forces Agreement (SOFA) includes provisions that require U.S. military personnel and contractors to abide by the laws of FSM federal and state laws. The construction contract would also include specific language on contractor employees behaving in line with Yap laws and traditions. Contractor has authority to impose curfews and prohibit illicit drug use. FSM has authority to request removal of contractor employees.
64	Scoping Meeting (Oral)	Viliame Lagonilakeba	Given that the EIS is a procedural requirement, what is the substantive requirement for the U.S. to meet what Yap is requesting?	The COFA treaty sets legal standards that the US needs to follow.
65	Scoping Meeting (Oral)	Ryan James	What is the difference between substantive and procedural requirements?	Substantive requirements include the rights and obligations that are afforded under a law such as discharge limits. Whereas the procedural requirements include the legal steps and methods for enforcing those rights and obligations (i.e., agency approval, legal notice, public and agency review timelines, etc.). The COFA treaty sets legal substantive and procedural standards regarding environmental planning and for an action requiring an EIS, requires development of written standards to implement the substantive provisions of specific laws applicable to U.S. activities in the FSM under Section 161(a)(3) of the COFA.

#	Source	Commenter Name	Comment	Response
66	Scoping Meeting (Oral)	John Rulmal	Who monitors and ensures that the requirements are implemented once construction starts?	Each project would have a multi-layered system of construction management and monitoring to ensure that requirements are being met. Below are some of the layers that exist: The Resident Officer in Charge of Construction (ROICC) is a U.S. DoW employee and an integral part of any major military construction project who would reside on Yap and manage the contractor and ensure compliance through routine on-the-ground interactions and inspections. The Contracting Officer and Contracting Officer's Representative are additional U.S. DoW employees that are responsible for ensuring the contractor performs the work according to the contract specifications, including environmental protection requirements stipulated in the contract. The construction contractor would be required to employ an environmental manager and a team of environmental monitors responsible for ensuring that the construction work is performed according to the contract specifications, including environmental protection requirements stipulated in the contract. A Yapese community liaison officer will be employed by the U.S. DoW to ensure that any potential issues or concerns raised by the community are communicated to the ROICC, Contractor, and DoW and promptly addressed.
67	Scoping Meeting (Oral)	Name not redorded	How will the EIS be made available to the public?	It will be posted to the project website for viewing/download. A hard copy will be made available at the public library. A notice of availability will be published in the Kaselehlie Press, shared with stakeholders, and posted around Yap. There will also be a public commenting period with public meetings planned when the draft EIS is published.
68	Scoping Meeting (Oral)	Kathe Burch	Even though silt curtains are not proposed for the channel entrance, would turbidity monitors be used at this area?	Yes, turbidity monitoring will be used wherever dredging is performed. If the conditions prohibit buoy monitors, periodic testing will be performed

#	Source	Commenter Name	Comment	Response
69	Scoping Meeting (Oral)	Kathe Burch	Can you explain the plume model?	Plume modeling will use the verified and calibrated metocean data to simulate the settling of fine particles of dredged material through the water column including the effects of waves, wind and tides. The modeling framework, inputs and outputs are based on state of the art, peer-reviewed industry standards. The results can be used to understand the behavior and extent of turbid plumes. This allows areas of potential impacts to be identified and necessary mitigation measures to be developed to ensure that potential impacts are minimized so far as is reasonably practical.
70	Scoping Meeting (Oral)	Lorraine Shaughnessy	Would silt curtains be used at the channel entrance if other experts thought it would be beneficial or new information was brought forward to support their use?	The concern with using silt curtains in the entrance channel is navigation safety, based on experience of the design team gained over a lifetime of working on dredging projects around the world. Also silt curtains could damage the reef if they were washed away by wave action on the outer reef. In cases when sea conditions are tranquil, and if local pilots, MSC and the Port believe there is no navigation hazard, silt curtains could be deployed and will be effective. In high sea states, dispersion of suspended sediment is maximized.
71	Scoping Meeting (Oral)	Kathe Burch	When was the data collected for the wind, waves, and currents? And what is the date range of the historical data that was incorporated into the model? Does it include data from Typhoon Sudal?	Wave and current data was collected to assess how well the model simulates ambient conditions. Three instruments were deployed at the port area: one surface buoy to measure waves (Sofar Spotter buoy) and two Nortek acoustic doppler current profilers (ADCPs) placed on the seafloor that measure currents throughout the water column as well as waves. The measurement period was 12 months, with interim data retrieval at 3 months. In addition to the surface buoy and ADCPs, a boat-mounted ADCP, pointed downward, was used to measure currents along transects surveyed across the entrance channel. This approach allowed the model results to be assessed against metocean conditions across all four seasons. Field data collection activities were undertaken between April 2024 and May 2025. The plume dispersion modeling did not consider Typhoon Sudal since dredging activities would not be undertaken during typhoon conditions.

#	Source	Commenter Name	Comment	Response
72	Scoping Meeting (Oral)	Kathe Burch	How long would it take to complete dredging on the Tamil side of the channel? Would it be 24-hours per day? Or only during daylight hours?	Assuming a typical dredging rate for a medium sized backhoe dredge, dredging the Tamil side of the channel would take around 4-6 weeks if restricted to daylight hours only, allowing for weather/sea conditions interruptions. Contractors typically want to complete dredging as quickly as possible (i.e., 24 hour dredging operations) because of the daily cost of using dredging equipment. The EIS will evaluate dredge operations and identify best management practices and avoidance/minimization measures. Could include restricting night-time dredging, or BMPs for night lighting, etc.
73	Scoping Meeting (Oral)	Kathe Burch	Need to confirm the spelling of “Tamil” could be “Tomil.”	Tamil is the accepted spelling. Tomil is the old spelling. But we can confirm this information with the Yap Task Force.
74	Scoping Meeting (Oral)	Kathe Burch	What are the measures to minimize impacts to marine biology outside of silt curtains? How do you ensure marine species can vacate the area prior to dredging?	BMP's include soft-start methods e.g., using the dredger to thump the seabed prior to beginning dredging to allow marine species to vacate. Pile driving soft-start methods require an initial set of strikes with reduced energy to be followed by a waiting periods and then slowly increasing the energy of subsequent strikes. Selection of the type of dredging equipment minimizes generation of turbid water and avoids the need for any drill and blast type operations. All in-water operations (such as dredging and pile driving) will include experienced observers to monitor for protected species (e.g., turtles, dolphins, etc.) and stop all in-water work if a protected species approaches within the recommended shutdown distances. Dredging and pile driving would be paused if protected species enter the shutdown distance, and all work would stop until the animal departs the area voluntarily or after 30 minutes have passed since the last animal sighting. Additional BMPs will be implemented to reduce potential vessel collisions and interactions with protected marine species. Fish and other mobile species typically vacate the dredging area once dredging activity begins.
75	Scoping Meeting (Oral)	Leevin Camacho	The EIS needs to consider potential impacts to the Tamil marine protected area.	The EIS team agrees with your comment. The EIS will consider impacts to marine protected areas.

#	Source	Commenter Name	Comment	Response
76	Scoping Meeting (Oral)	Leevin Camacho	The EIS needs to consider potential impacts to the grouper spawning area.	The EIS team agrees with your comment. The EIS will consider impacts to grouper spawning areas.
77	Scoping Meeting (Oral)	Leevin Camacho	What is the total area of reef that will be directly and indirectly impacted by dredging?	Total area of reef directly impacted, defined to mean the extent of the dredge area footprint, is approximately 28,000 square meters. All reasonably foreseeable impacts are to be determined in the EIS analysis.
78	Scoping Meeting (Oral)	Julie Hartup	Please provide the locations and depths of the data collection buoys that were used.	Three instruments were deployed at the port area: one surface buoy to measure waves (Sofar Spotter buoy) and two Nortek acoustic doppler current profilers (ADCPs) placed on the seafloor that measure currents throughout the water column as well as waves. The measurement period was 12 months, with interim data retrieval at 3 months. The ADCPs were deployed approximately 100 to 150 m and 1 to 1.2 km offshore to the east of the wharf, water depths at the deployment sites were 20 to 30 m. The spotter buoy was deployed on the west side of the outer channel through the reef on a relatively flat portion of the reef between 10 to 20 m deep. In addition to the surface buoy and ADCPs, a boat-mounted ADCP, pointed downward, was used to measure currents along transects surveyed across the entrance channel. CHECK
79	Scoping Meeting (Oral)	Name not redorded	Will the dredge timing consider ocean conditions (e.g., trade wind season, tide phases, coral and fish spawning, seagrass reproduction periods, etc.).	The EIS analysis would include Best Management Practices, and mitigation measure, if required, to reduce or avoid any significant impacts. It is expected that restrictions will be placed on the timing of dredging operations in relation to coral spawning periods. The specific restrictions associated with coral spawning and other periods will be confirmed as part of the EIS. Day to day restrictions on dredging activities will be informed by turbidity monitoring as part of an adaptive management strategy.

#	Source	Commenter Name	Comment	Response
80	Scoping Meeting (Oral)	Cara Lin	What is the role of biological monitors? Do they also check the turbidity monitoring devices? Refers to Port of Miami dredging problems.	Biological monitors are typically focused solely on monitoring for biological resources. Turbidity monitors would be monitored by the contractor and the DoW would enforce compliance with the environmental compliance plan. Port of Miami is not a relevant example since it involved the use of six dredging vessels to remove 5.2 million cubic yards of material. The dredging activities proposed in Yap are much smaller in scale. The type of turbidity monitor is to be determined and will likely include more than one type (i.e., buoy mounted, periodic sampling). Marine Species Observers will be required to have experience in the field and qualifications to identify protected marine species. The observers will keep constant vigilance for protected species during all in-water construction activities and will ensure that BMPs are implemented properly, monitor and record any observations of protected species, and notify construction managers if a BMP must be repaired or a protected species enters within the project shutdown zones.
81	Scoping Meeting (Oral)	Cara Lin	How will you monitor for sediment accumulation from dredging? Need to have multiple levels of precautions to prevent and monitor for potential impacts.	Sediment deposition depth is an output from the dredge plume modeling study. The EIS and the environmental compliance plan will establish a range of avoidance, minimization, mitigation, and monitoring measures to be implemented with the Proposed Action. These measures will be presented in the EIS and included in the ROD.
82	Scoping Meeting (Oral)	James Lukan	Who are the bad actors that the presentation refers to?	“Bad actors” refers to those who intentionally use coercion, deception, or illicit activity to restrict a free and open Indo-Pacific or to infringe on the sovereignty and rights of other nations.
83	Scoping Meeting (Oral)	Kai Kopecky	Would the military presence keep these kinds of bad actors out of Yap?	U.S. DoW presence would not be permanent, but the episodic training and exercises would help to deter bad actors and show the strength of the U.S. – Yap/FSM partnership.
84	Scoping Meeting (Oral)	James Lukan	We see what is happening in Guam and Palau with the buildup of military activity. Would the military presence in Yap remain episodic or are there plans for a permanent presence? There’s a real need for a long term US presence in the region	There are no plans for permanent stationing in Yap. The projects would help the U.S. DoW to respond to crises in the region, whether they be caused by natural hazards or bad actors.

#	Source	Commenter Name	Comment	Response
85	Scoping Meeting (Oral)	James Lukan	Why is there water behind the extended wharf? Why not connect it to land?	The wharf extension is a pier-supported structure, and from a structural engineering perspective, it is better to not connect the entire wharf extension to land because of seismic cl88onsiderations. It is better if the pier-supported wharf can flex and sway in the event of an earthquake; connecting it fully to land would make the structure more rigid and therefore more susceptible to seismic forces. The pier supported wharf extension was designed in accordance with best practice and similar designs can be seen at locations across the world.
86	Scoping Meeting (Oral)	James Lukan	Would pile driving stop by 6:30 PM to reduce impacts to local residents?	The U.S. DoW will coordinate with the Yap State Task Force and follow up on specific considerations for minimizing construction period impacts on the surrounding communities. The EIS will evaluate potential impacts and identify best management practices and avoidance/minimization measures which could include pile driving time restrictions (for example, avoiding specific hours).
87	Scoping Meeting (Oral)	Nicole Crane	Would the EIS consider underwater noise impacts to wildlife? Including marine mammals and fish with swim bladders?	Yes, an underwater acoustic noise study has been completed. The EIS will evaluate potential impacts on underwater noise on wildlife (such as marine mammals and fish with swim bladders) and identify best management practices and avoidance/minimization measures which could include pile driving time restrictions (for example, avoiding specific hours).
88	Scoping Meeting (Oral)	Kai Kopecky	Do we know the coral growth rates in the channel?	Coral regrowth rates vary with depth. Other factors include oceanographic conditions (e.g., turbidity, temperature, currents, etc.). Portions of the channel were dredged in 1991 and serves as a test case for coral regrowth after dredging.
89	Scoping Meeting (Oral)	Kai Kopecky	Will the dredging leave loose unconsolidated rubble that will prevent recolonization?	Proposed backhoe and clamshell dredging would minimize loose unconsolidated rubble.
90	Scoping Meeting (Oral)	Nicole Crane	Curious why dredge depth was chosen. Could the project dredge deeper to allow for coral regrowth?	Dredge depth was determined based on under keel clearance (for navigation safety) for the design vessels. Deeper dredging would create a greater direct impact from dredging.
91	Scoping Meeting (Oral)	James Lukan	Has the Task Force reached out to the Weloy community?	This scoping process is an opportunity to gather input from the Weloy community and the Task Force intends to continue coordination. The illustrations in the presentation represent a demonstration of what could be done with the dredge material. It could be adapted based on input from the Weloy community.
92	Scoping Meeting (Oral)	James Lukan	Dredging needs to take into account fishing rights within the proposed dredge areas?	Noted. The Yap State Task Force and the project team will be reaching out to determine potential impacts to fishing rights.

#	Source	Commenter Name	Comment	Response
93	Scoping Meeting (Oral)	Name not redorded	Has the team considered the timing of dredging (i.e., incoming vs. outgoing tide)? The tide phase drives currents.	Yes, timing of dredging has and will continue to be considered during the EIS process. The sediment plume model incorporates the full range of currents and tidal phases. The design team will continue to refine the model and follow up with local stakeholders.
94	Scoping Meeting (Oral)	Nicole Crane	Does the model consider major weather events and/or hazards?	There will be no dredging activities during storm events due to safety concerns.
95	Scoping Meeting (Oral)	Kai Kopecky	Curious about timing of mitigation.	The timing of when a particular mitigation is implemented is based on type of mitigation. For example, relocating particular plant or animal species from the project site in order to protect and preserve it would take place prior to any land clearing. Other types of mitigations, such as restoration of an area leveled for temporary construction equipment storage, would be implemented once the construction is completed and the land is no longer needed to store the equipment. This type of mitigation takes place towards the end of construction.
96	Scoping Meeting (Oral)	John Rulmal	What is the U.S, interest in the project? Why make such a significant investment in Yap if it will only be used for a couple of weeks for training?	The project is part of the overall U.S. strategy to deter bad actors and ensure a free and open Indo-Pacific.
97	Scoping Meeting (Oral)	Nicole Crane	Does the community a need for these projects and is the discussion of benefits coming from the community? Or is it just being driven by U.S. military interests?	The DoW is responsible for providing defense for and responding to crises within the FSM, and these projects will allow DoW to be more effective in providing defense and responding to crises for the FSM (including Yap). These positive impacts will benefit Yap. In addition, the DoW has been working closely and consistently with the FSM National and Yap State Government to ensure that the project is adapted to the needs of the local community. Further, the EIS process requires community involvement to understand the community's concerns, answer their questions, and inform decisions.
98	Scoping Meeting (Oral)	Nicole Crane	Has there been evidence of bad actors in the region? Could you please provide examples?	Yes. There has been clear evidence of bad actors in the region. Across Micronesia and the other COFA nations, authorities have documented illegal fishing, unauthorized research, and foreign vessels operating outside normal trade routes with their identification systems turned off, a behavior commonly linked to illicit or unapproved activity. These actions undermine the sovereignty and resources of island communities and highlight the importance of strong partnerships with for Yap and the region.
99	Scoping Meeting (Oral)	Nicole Crane	Was Yap involved in developing the requirements for the project?	The requirements for the project were developed by the U.S. DoW to facilitate their ability to respond to crises in the region. Once Yap was determined to be the appropriate location for these projects, DoW started close and consistent coordination with the FSM National and Yap State Government to ensure that the project is adapted to the needs of the local community.

#	Source	Commenter Name	Comment	Response
100	Scoping Meeting (Oral)	Margie Falanruw	If the construction damages the ability of local Yapese to sustain themselves it will hurt the community and the traditional way of life. How will the community be assured that their environment and way of life will be protected?	Defense isn't just limited to deterrence and defending the people of Yap, it also extends to protection of Yap's rich natural and cultural environment. Through close coordination with the Yap Government, the Yap State Task Force, and local stakeholders (e.g., Council of Pilung, Yap State agencies, traditional leaders, etc.) the process will ensure that the project will anticipate potential impacts and establish measures to avoid, minimize, and mitigate potential impacts in line with Yapese priorities.
101	Scoping Meeting (Oral)	John Rulmal	I'm concerned that you don't know enough about Yap; how can we be involved?	The NEPA process was designed to engage local communities in the identification of potential impacts, and means to avoid, minimize and mitigate those impacts. In addition to the public scoping meetings, the local community will have another opportunity to engage, review, ask questions, provide feedback on the EIS during the public commenting period when the Draft EIS is published in the Spring of 2026.
102	Scoping Meeting (Oral)	Margie Falanruw	How can Yapese be involved to ensure that negative impacts are avoided?	The purpose of the public scoping meetings and the EIS process is to engage and learn from the Yapese residents to ensure that their concerns are being addressed and that their knowledge informs the analysis of potential environmental impacts and avoidance, minimization, and mitigation measures. The U.S. team is also working closely with the Yap Task Force in the development of the project and the EIS.
103	Scoping Meeting (Oral)	Margie Falanruw	Could the U.S. team please provide a response to email commenters to confirm that their comments were received?	As a response to this suggestion, the EIS team has set up an automatic email response confirming receipt of emailed Public Scoping comments.
104	Scoping Meeting (Oral)	Name not redorded	There is a reservoir and water line on the west end of the runway that needs to be considered.	The project design and the EIS analysis will consider this public infrastructure, and the design team will be following up with the water system manager. The water line will be placed in a protective conduit as required if placed under pavement.
105	Scoping Meeting (Oral)	Jeff Adalbai	Where is the mulching planned to be located and what size would the plant material be chipped to prior to mulching? The community prefers chipping to a smaller size so that the mulch would be ready sooner.	The U.S. project team continues to coordinate with the YUMO Task Force to identify laydown areas for green waste produced as a result of the proposed projects. One potential area for green waste management would be the savannah area south of the airport but this area has not been confirmed. The natural resources and design teams understand the community preferences and will follow up with the YUMO task force regarding the size of chipped material and availability of mulch at the appropriate time.

#	Source	Commenter Name	Comment	Response
106	Scoping Meeting (Oral)	Kathe Burch	Why can't there be just one man camp between the two projects?	Worksite proximity will be something the prime contractors will want to maximize. The airport and seaport projects will likely be contracted separately and may have different contractors conducting the work. They would also have different timelines. Typically each contractor would manage its own man camp, but there is a possibility it could be collocated.
107	Scoping Meeting (Oral)	Kathe Burch	Would Yapese workers for the Airport and Seaport projects be able to access the medical resources from the contractor?	The contracts would not likely require a new medical facility, but they would likely require medical professionals (e.g., doctor and/or paramedics). There would also be medical evacuation procedures in the case of a serious medical incident. Local Yapese workers would have the same access to these medical resources as workers from off-island.
108	Scoping Meeting (Oral)	Leevin Camacho and Julie Hartup	What happens in the EIS if we were to state there are no significant impacts anticipated to a particular resource, but in reality, there are?	The National Environmental Policy Act requires an analysis of the reasonably foreseeable environmental effects of the Proposed Action. If the Proposed Action results in unforeseen adverse effects, then additional environmental analysis, of some kind would be required. That analysis could include the implementation of new mitigation measures to address the unforeseen effects. Unforeseen environmental damage that is not adequately mitigated could also be a basis for a claim for damages against the U.S. through the FSM government under the provisions of Article XV of the SOFA.
109	Scoping Meeting (Oral)	Margie Falanruw	Who would maintain the detention ponds?	If the areas are included in the defense site agreement, they would become eligible for earning sustainment funds which could be used to contribute toward maintenance. The U.S. DoW would work with Yap State and the FSM to develop appropriate operating and maintenance agreements to ensure protection of the U.S. investment in airport improvements. Additionally, the detention basins have been designed to require simple maintenance. Specific skills or tools will not be required to maintain the basins.
110	Scoping Meeting (Oral)	Margie Falanruw	Will the project design and the EIS consider potential salinity impacts to the mangrove/nearshore environment downstream from the airport?	The project has been designed to maintain existing drainage patterns as much as possible. While there would likely be additional stormwater volume from the additional impervious surfaces, the ratio of stormwater reaching the different drainage basins at the airport would be maintained. Additionally, the installation of the detention basins and stormwater management measures would meter out the flow of stormwater over a longer period of time to prevent the heavy pulses of stormwater into the mangrove. This topic will be carefully considered in the EIS
111	Scoping Meeting (Oral)	Nicole Crane	When will the maintenance plan be activated?	The U.S. DoW would work with Yap State and the FSM to develop appropriate operating and maintenance agreements to ensure protection of the U.S. investment in airport improvements prior to completion of construction. The contractor will be responsible for maintenance during construction.

#	Source	Commenter Name	Comment	Response
112	Scoping Meeting (Oral)	Leevin Camacho	Will the hydrological studies informing the stormwater design be provided to Yap State?	Yes
113	Scoping Meeting (Oral)	Leevin Camacho	Will the noise impact analysis include worst case scenarios and (e.g., loudest aircraft, wind conditions, and all proposed additional flights) and will it include construction period impacts? Also needs to consider episodic events.	The noise analysis will be conducted in compliance with FAA standards. It will analyze the potential noise impacts from the types of airplanes the U.S. DoW intends to land at the airport including fighter jets. The noise analysis will take into account the frequency of proposed operations. The noise analysis will consider construction-period noise impacts on nearby noise-sensitive uses.
114	Scoping Meeting (Oral)	Leo Falcam	Please explain the proposed fuel system improvements and will they be addressed in the EIS?	The airport fuel system is currently being developed and may require additional modifications. The EIS will assess current plans for fuel storage and system operations, identify possible avoidance/minimization measures (e.g., secondary containment, spill prevention plan, etc.), and analyze impacts.
115	Scoping Meeting (Oral)	Leo Falcam	Has there been discussion with local fuel suppliers/vendors to supply fuel for the proposed improvements?	Yes, the Defense Logistics Agency has had initial conversations with a local vendor, but no agreements have been reached. The DOW team will continue to coordinate with DLA, FSM, and Yap State on the matter, but such details are outside the scope of this EIS.
116	Scoping Meeting (Oral)	Kai Kopecky	What if the National Environmental Policy Act and/or other U.S. environmental laws and regulations are changed or repealed during project planning and construction, how would it impact the project?	This would be fact dependent, changes to environmental requirements may be possible after award, but once the construction is awarded, it is unlikely that the U.S. DoW would change contract requirements as a result of repeal of regulations. Additionally, the COFA contains provisions for environmental protection provisions that account for applying National Environmental Policy Act as amended when and if that occurs when a particular action is evaluated. The Environmental SOP being developed to by US DOW and FSM/Yap in support of this project will address how, if applicable to address changes in laws noted in the Compact. The Compact provisions control and only can be modified by both parties.
117	Scoping Meeting (Oral)	Kai Kopecky	What about international agreements like the Paris agreement on greenhouse gas emissions?	The US recognizes that FSM has commitments under these agreements, and the U.S. DoW would defer to FSM regarding their compliance with international agreements. The EIS will include estimates of greenhouse gas emissions associated with the project construction and operation. Emissions associated with construction and training of US Military are considered emissions of the US in this instance

#	Source	Commenter Name	Comment	Response
118	Scoping Meeting (Oral)	Cara Lin	Change in stormwater flow to the mangrove area downstream of the airport could also impact sediment flows. Recommend that the project team determine baseline conditions for sediment flow into the mangrove and try to match that rate during the construction and operations period. Monitoring would also be helpful to determine if the projected sediment flows are being met and to evaluate whether adjustments are needed.	The proposed drainage system has been designed to mimic existing drainage patterns at the airport and provide additional improvements (e.g., detention ponds). Monitoring could be a mitigation measure established in the EIS if it is identified as a community priority.
119	Scoping Meeting (Oral)	John Rulmal	The Yapese residents that are most likely to be negatively impacted by the project are unlikely to speak up regarding their concerns. How will the EIS ensure their concerns are addressed?	The purpose of the scoping meetings is to engage with the local community, listen to their concerns, and gather input to incorporate into the Draft EIS. The team has met with all three affected municipalities. Additionally, the team is coordinating closely with the Yap State Task Force. Finally, the EIS process will include a socioeconomic study informed by interviews with local Yapese stakeholders and residents.
120	Scoping Meeting (Oral)	John Rulmal	I was a liaison for a previous project (not a DoD project), and promises were not kept. How will this project ensure that the U.S. will follow up on its commitments.	This project team will do everything possible to ensure that those mistakes are not replicated. Close coordination with the Yap State Task Force and community leaders will help to ensure accountability, and we have specific requirements under the COFA to protect the people and environment of Yap.
121	Scoping Meeting (Oral)	Jeff Adalbai	Yapese leadership is multi-layered (e.g., State government, municipalities, traditional leaders, etc.). More than one community liaison may be required to ensure effective coordination and bridge gaps.	The DoW will continue to coordinate with the Yap State Task Force to determine the best ways to ensure effective coordination
122	Scoping Meeting (Oral)	Nicole Crane	Need to step way back; these are big projects and there will be negative impacts. What would happen if impacts are greater than anticipated?	The EIS will evaluate potential impacts based on the best available data, and identify avoidance, minimization, monitoring, and mitigation measures, if required. An environmental compliance plan will be prepared for the project including environmental thresholds that the contractor must abide by during the construction process. If minimization measures are not resulting in compliance with those thresholds, the contractor would need to adjust their approach to come into compliance.
123	Scoping Meeting (Oral)	Nicole Crane	Are there funds available for the community to hire their own scientists and prepare their own environmental studies?	Yap State has hired expert lawyers and scientists with specific experience in the region to help provide input and review the EIS. The US DoW team will be working in coordination with the Yap State Team to incorporate best available data and ensure that the analysis addresses their concerns.

#	Source	Commenter Name	Comment	Response
124	Scoping Meeting (Oral)	John Rulmal	How will the EIS incorporate information that may be culturally sensitive or "secret information" that individuals may not be comfortable sharing?	The EIS will use information collected through a socioeconomic study conducted in coordination with the Council of Pilung (traditional leaders), the Yap HPO, and the Yap State Task Force. The study consists of information gathered through interviews with local Yapese stakeholders and residents. The Council of Pilung, the Yap HPO, and local traditional leaders will be consulted in designing the socioeconomic interviews and the associated reporting. The cultural information shared during the ethnographic study will be utilized to help determine the effects of the proposed action upon that resource and to avoid, minimize or mitigate those effects. Specific information will not be divulged in the document if noted by stakeholders as being culturally sensitive information.
125	Scoping Meeting (Oral)	Kai Kopecky	Is there sufficient time to conduct the required studies and analyses given the expedited timeline? Is there scope/time to relocate species	The DoW has been conducting baseline surveys since 2023 and additional studies are underway including for socioeconomic, wetland & mangrove, traffic, noise and air quality. Additionally, the project team will be incorporating best available data from other sources that can help establish baseline conditions. The EIS process would analyze potential impacts of the proposed action and include best management practices, SOPS, or mitigations, if needed, to avoid or minimize adverse impacts. For example, construction activities may be phased to allow time for species relocation if determined necessary
126	Scoping Meeting (Oral)	Kai Kopecky	What is the timeline for construction, monitoring, and mitigation?	The construction contract award could occur as early as SEP 2026. The EIS will establish monitoring and mitigation requirements and those requirements will be built into the construction contract.
127	Scoping Meeting (Oral)	Kai Kopecky	Will there be opportunities for adaptive management in regards to mitigation measures (i.e., if impacts are greater than anticipated, or minimization measures are not working as anticipated, could they be adapted during the process)?	Yes, the environmental compliance plan will include environmental thresholds that the contractor must abide by during the construction process. If minimization measures are not resulting in compliance with those thresholds, the contractor would need to adjust their approach to come into compliance. There may also be some opportunity for post award contract modifications if needed changes are identified while funding is still available for obligation. Note that MILCON funding is generally available for obligation for 5 years; it is then only available for execution of previously obligated tasks.

#	Source	Commenter Name	Comment	Response
128	Email Comments	Michael Glingor (Baleabaat' Community)	Yapese culture embodies a deep principle of balance between “give and take,” and we strive for complete transparency, thorough due diligence in the methods implemented, and the use of cutting-edge equipment to ensure that projects at the port and airport lead to fair outcomes with minimal adverse effects. This clarity is essential, as our community depends on the surrounding reefs for sustenance and cultural heritage. The Baleabaat’ community requests a comprehensive assessment of the entire environmental impact of dredging activities carried out by the Department of War (DOW), since these operations could disrupt vital marine ecosystems. In Yapese, “Aiy’ Weg” signifies stewardship and profound care for the ocean—a value deeply rooted in the lives and hearts of the Baleabaat’ people. Situated along the shoreline at the water’s edge, Baleabaat’ features extensive mangroves, seagrass beds and reefs within the harbor and reaches out to the Gilman reefs, making it especially vulnerable to both direct and indirect effects of the seaport project. To uphold these principles, I wish to submit the following list of comments:	The EIS team greatly appreciates these provided comments.
129	Email Comments	Michael Glingor (Baleabaat' Community)	Failure to communicate the precise location of dredging activity during the scoping comment period: The Baleabaat' community does not identify locations on the reef through use of maps. Thus, the maps of where the dredging is proposed provided by DOW are of limited use. By failing to mark the location on the reef where dredging is proposed limits the Baleabaat' community's ability to comment on the actual habitats, species, and resources that will be impacted. The scoping comment period should be extended to 30 days after the reef has been marked to inform the community of the location of the dredging.	Maps of the proposed dredging areas (two areas at the outer entrance channel, a shallow reef area between channel markers R14 and R16 near the wastewater treatment plant (referred to as the turning basin area) and an area along the toe of the existing wharf) were provided and described at each of the scoping meetings. The two sites at the outer channel including approximately 3.2 acres along the reef edge between channel markers G1 and G7 on the Tamil side (deepening and widening an area dredged in the 1991 port improvement project) and approximately 1.6 acres located about 1,000 feet either side of the R2 marker on the Baleabaat' side of the channel entrance. The project engineers will reach out to the YUMO Task Force to address and clarify questions regarding dredging area.

#	Source	Commenter Name	Comment	Response
130	Email Comments	Michael Glingor (Baleabaat' Community)	Expansion on Habitat, Reef, and Substrate Baseline Data for All Areas Within the Harbor for Baleabaat': The current surveys for dredging areas and surrounding habitats in Baleabaat' harbor rely primarily on manta tows (by snorkel) and satellite remote sensing, which provide limited and potentially inadequate baseline data on reefs, substrates, and overall marine ecosystems. Manta tows, conducted at the surface level via snorkeling, are constrained to shallow depths and fail to capture information beyond approximately 30 feet, rendering them insufficient for accurately identifying fish populations, coral structures, and cryptic species that inhabit deeper zones. Furthermore, the method—typically involving a tow line pulled behind a boat—generates significant noise and disturbance, often scaring away sensitive species and resulting in incomplete or biased documentation that does not truly represent the biodiversity present. Satellite remote sensing, while useful for large-scale mapping, relies on predictive analytical methods that extrapolate differences in water colors and reflectance patterns. However, this method is inherently limited without solid ground-truthing through in-water validation techniques, such as direct sampling or diver observations, to verify predictions and to account for local variations in water clarity, turbidity, and substrate composition. To establish a more comprehensive and reliable baseline, we recommend including transect surveys at a minimum of three distinct depth profiles (e.g., shallow reef flats, mid-channel depths, and deeper slopes) along the proposed dredging channel, as well as across adjacent reef flats and the extended reef systems extending southward toward the Gilman reefs. These surveys should cover key habitats, including coral reefs, seagrass beds, and mangrove fringes, and be conducted seasonally over a full year. This approach will help identify patterns of species use, migration, reproduction, and resilience under different environmental conditions, ensuring that potential dredging impacts on these vital ecosystems—important for Baleabaat's food security and cultural practices—are thoroughly assessed and mitigated.	Manta tows were one method used in the marine baseline survey (NAVFAC PAC 2023) for rapidly characterizing large areas of reef in the vicinity of the planned dredging. Other methods included multibeam sonar, drop cameras and visual surveys by scientific divers. The marine survey included four components: 1) marine habitat mapping, 2) benthic/biotic surveys, 3) ecotourism investigation, and 4) remote sensing. The marine habitat mapping recorded the habitat boundaries within the survey area, and benthic/biotic surveys captured the existing species coverage/abundance and species richness within representative portions of the survey area. Information was also gathered regarding ecotourism in the survey areas, which involved preliminary research of publicly available data and subsequent communication with local tour operators. Lastly, a remote sensing survey used multibeam sonar and drop camera data to collect bathymetric where depths exceeded diveable limits. Remote sensing refers to the use of a multibeam sonar system mounted to a boat that traveled survey lines throughout the entire area. Satellite remote sensing was only used for a dual-antenna, global navigation system receiver to map locations with centimeter accuracy in position and elevation. The research design for the baseline survey was described in a Desktop Analysis Report (NAVFAC PAC 2022) that documented broad research into Yap marine and estuarine systems including references to pertinent literature (e.g., Falanruw (various dates), FSM (2001 and 2018), SPREP (2007 and 2018), Nature Conservancy (2016), Allen Coral Reef Atlas (2020), records from the 1991 dredging/wharf construction project and a number of other key sources). These sources and others helped the marine biologists gain a good understanding of the resources prior to the actual marine surveys. Additional sources provided by the Yap State Task Force scientists are also being reviewed by the EIS team and will be considered in the impact evaluation. The baseline survey covered over 1,000 acres of reef within the entrance channel, including the estimated 6.8 acres of actual dredging, to provide as comprehensive a baseline as possible. Characterizing the area to this extent permits evaluation of the overall health of the marine ecosystem in general and provides benthic percent cover or important biota. The Marine Baseline Survey includes descriptions of over 60 line-intercept and belt transects established to support characterization of reef fauna and benthos. The EIS team is comfortable that it has sufficient information to conduct the impact analysis

#	Source	Commenter Name	Comment	Response
131	Email Comments	Michael Glingor (Baleabaat' Community)	Expand Satellite Remote Sensing of Coral Reefs to In-Water Validation: Satellite remote sensing for habitat description needs to include in-water survey validation to be more than just “predictive”. It is suggested to expand the method used to include 3D mapping by GPS points of the channel and surrounding reef and reef flats of Baleabaat. This will ensure DOW and contractors have a full understanding of the habitat.	The waters around the entrance channel (e.g.. reef crest and reef flat) that are proximate to the Baleabaat' Community were carefully surveyed. It's not clear what the use of the term "predictive" implies as these were actual physical surveys with scientific divers - not predictions created by some sort of model. A remote sensing survey used multibeam sonar and drop camera data to collect bathymetric where depths exceeded diveable limits. Remote sensing refers to the use of a multibeam sonar system mounted to a boat that traveled survey lines throughout the entire area. Satellite remote sensing was only used for a dual-antenna, global navigation system receiver to map locations with centimeter accuracy in position and elevation.
132	Email Comments	Michael Glingor (Baleabaat' Community)	Cultural Importance and Food Security Concerns: Fishing is of cultural importance as well as a daily practice for food, the equivalent of going to a “supermarket”. Baleabaat, like many Yapese villages, is very organized in spatial planning of their fishing, and incorporates cultural management over their resources. Baleabaat’s community is not only reliant on their reef for food security, but so are many of the outer island communities. Baleabaat’ is very giving and generous with its resources to those who do not have the right to fish, often permitting individuals outside of their community to fish. Several areas are culturally protected and could be referred to as an “Emergency Reef”, akin to a food pantry. It is an area of reef that is only allowed to be fished on occasions when there is an unexpected event, such as a death/funeral. This is a way to ensure multi-generational fish security. Fishing when allowed in these designated “Emergency Reef’ areas reduces the time to harvest the food need in half compared to when fishing other reef flats and blue holes reef areas. One Emergency Reef designated area is similar to a western MPA and is at the tip of the channel, directly where dredging will occur. This area of the reef is highly valued, and the concern is 1. The community's inability to use this area to fish 2. If the recovery time is expected to be long-term (greater than 4 years), 3. Once the dredging is completed the military use times will conflict with the community's needs to fish the area.	We are grateful for this information and note that the "Emergency Reef" is not recognized as one of Yap's several MPAs. 1. The community's inability to use this area to fish The area to be dredged on the Baleabaat' side of the entrance channel is approximately 1.6 acres in extent, focused on the reef crest/reef slope into the channel to a depth of 41 feet. Dredging activity at that site is estimated to take 17 days. Oceanographic modeling expects that tidal flushing on incoming and outgoing tides will keep the dredge plume in the channel and not spread across the reef flat. Because of the hardness of the material to be dredged, and the mechanical method of dredging (excavator or clamshell buckets), entrained sediments are expected to settle out rapidly and fall to the channel floor (which is more than 100 feet deep). 2. If the recovery time is expected to be long-term (greater than 4 years). The dredged reef area will take many years to recruit the same level of coral as presently there. The 1991 dredging on the Tamil side of the entry channel is a good example of reef recruitment post dredging. 3. Once the dredging is completed, the military use times will conflict with the community's needs to fish in the area. There will be no military use of the reef areas. During military port calls, all exclusion zones are required to allow commercial and recreational boat traffic sufficient space for safe navigation within the port and harbor. There is no intent to change the current use of reef resources.

#	Source	Commenter Name	Comment	Response
133	Email Comments	Michael Glingor (Baleabaat' Community)	Mulit- species Spawning Fish within the Wanedai Channel, Corner, and Reef Flats: A major concern is habitat loss, as well as the impact of spawning fishing practices that could affect fishing abilities for generations. Parrotfish, wrasse, surgeonfish, rabbitfish, moorish idols, and tangs use Baleabaat' to spawn, especially near the mouth of the channel. This is usually seen from May to August, but can happen at other times, with some species spawning monthly. The concern goes beyond just dredging and construction periods, extending to increased port activity from military operations afterwards. An analysis is needed to assess how these impacts will affect spawning fish and whether fish populations will fail to recover due to increased activity following dredging and construction. A failure for fish populations to recover will directly impact food security, community physical health as imported food is substituted to traditional healthy protein sources, and cultural practices.	The EIS team understands the concerns for impacts to critical spawning periods for coral and fish species and is committed to avoiding coral and fish spawning seasons. Therefore, no impacts are expected for coral and fish spawning. Furthermore, actual dredging duration in the vicinity of Baleabaat' is projected at 17 days so there should be ample time to work around spawning events, and any impacts to critical spawning periods will be evaluated and assessed in the EIS and the associated protected species consultations.

#	Source	Commenter Name	Comment	Response
134	Email Comments	Michael Glingor (Baleabaat' Community)	Accumulation of impacts from dredging, noise from activity and pile vibrations, sedimentation affects fish behavior: Over three to four years, Baleabaat's reefs, particularly around Wanedai Channel, will experience cumulative impacts from construction activities (pile vibrations and pounding), dredging noise, equipment traffic, sedimentation, and reef removal. The concern is that these combined activities will have a more significant and prolonged effect on marine species, especially reef fish, and affect habitats such as reefs, mangroves, and seagrass beds. It is recommended that measures be implemented to limit the buildup of impacts, enabling the environment and species to recover. This could involve scheduling activities at different times or allowing "hands-off" periods to give the environment a break, while also supporting fish species and their habitats. Additionally, enhancing and expanding monitoring methods to include indicators of stress in fish species and habitats is essential. Conducting in-water surveys throughout the entire duration of activities, and establishing a "stress" indicator and protocol that, if impacts become too severe, would trigger a "pause" in activity. The proposed "soft start" of dredge machinery may "warn" rapidly moving species to leave the dredge area, but is insufficient to address the needs of slower species such as lobsters, sea cucumbers, and other small species necessary to a healthy reef and marine ecosystem.	The entire port project (dredging, port improvements and ATON replacement) will be completed within three years. The pile driving associated with the wharf extension is estimated to take 163 days to complete. Acoustical analysis of pile driving indicates the underwater noise effects will not be experienced in the west side of the channel due to the barrier formed by the port peninsula - sound effects will be reflected to the north and east side of the lagoon. Underwater sound from dredging operations is hardly detectible in comparison to the average overall background noise in the aquatic environment and does not pose a significant risk tor direct injury or mortality to aquatic biota. The outer channel dredging is expected to take 45 days to complete (both sides). The Baleabaat' Community is located approximate 0.9 miles from the seaport so its unlikely wharf-related construction noise will be a concern to residents (the EIS noise study will assess community noise impacts). We concur with the potential for cumulative effects and the EIS will include construction best management practices and controls to regulate Contractor activities - including biological and water quality monitoring in accordance with preestablished standards. The Construction contractor will be required to pause operations if parameters exceed these standards. Additionally, possible avoidance measures may include restricting in-water work during important spawning periods for specific species of fish and coral.

#	Source	Commenter Name	Comment	Response
135	Email Comments	Michael Glingor (Baleabaat' Community)	Baleabaat' Knowledge of Water Movement and Sedimentation: Local knowledge of water movement and sedimentation patterns has been passed down through generations, combining traditional knowledge with individual experience. Water flows in and out of Wanedai Channel at varying speeds depending on depth, and can travel in unexpected directions based on depth. Water moves through the channel into the bay, around the bend in Tomil, and through German Channel. The flow varies with wind and tides. You can observe the movement of water in German Channel. Past storms, shipwrecks, and oil spills have shown that actual water movement does not always match the modelling presented by DOW. It is expected that sedimentation will occur not only within the channel but also on the surrounding reef flats and outside the channel during outgoing tides. The plume will extend beyond the mouth of the channel and then travel southward, depending on the current. It is crucial that other methods be used to accurately capture water flow, movement, turbidity, and sedimentation. A much larger area of impact is anticipated based on local knowledge of water flow in Wanedai Channel and outside the reef.	The EIS team appreciates these provided comments. Water movement was modeled under various scenarios. Details on coastal data collection and coastal modeling was shared with the FSM National Government and the Yap State Government and its scientists via a presentation on October 1. A dredge plume modeling study is being completed to simulate the short-term dredging activities.
136	Email Comments	Michael Glingor (Baleabaat' Community)	Mangrove Projected Area: Adjacent to the dredging site, right next to the men's house, is a protected mangrove area. It was initially established through YapCap, which protected it for 8 years, and has since been extended to 12 years. Mangroves are culturally significant, especially for women, as much of the gathering and fishing, such as for clams and oysters, is done by women. In addition to women's mangrove fishing practices, men also utilize the area for fishing using tides, following designated paths that fish travel into and out of the mangroves. This mangrove will be in the direct path of sedimentation, which could undo the protection it previously received to ensure it remains a resource for local use and future generations. It is requested that monitoring of sedimentation and turbidity be implemented near the mangrove sites so activity can be halted if levels become too high. Additionally, knowing the estimated recovery time will help the community plan for any disruption to our food resources.	The DOW team has initiated coordination with Yap State scientists on approaches to avoid and/or minimize impacts on Mangrove communities. Turbidity monitoring buoys will be deployed around the perimeter of each dredging site that will alert monitors if TSS exceed an approved threshold which will trigger a shut down of the dredging operation until TSS had dropped below the agreed threshold. This protocol will ensure that sedimentation and turbidity effects are contained with an agreed upon perimeter.

#	Source	Commenter Name	Comment	Response
137	Email Comments	Michael Glingor (Baleabaat' Community)	Large Seagrass Bed Area: Baleabaat's reef flat areas are home to extensive seagrass habitats. This seagrass is known to bloom during the summer months, creating a river of "coconut" flakes on the surface. Seagrass beds provide habitat for juvenile fish, snails, crabs, and other species. Comprehensive mapping and baseline assessment of the habitat are requested to ensure a thorough understanding and recognition by DOW and construction companies, alongside increased monitoring efforts in the water during activities.	Seagrass habitat was observed on the north end of Survey Area 3 on the Baleabaat' side of the entrance channel, over 1,000 feet from the proposed dredge site (no seagrass was observed on the Tamil side of the entrance channel). See Figure 3-2 in NAVFAC PAC 2024. This site will be monitored by the biologists to ensure it is protected during dredging activities
138	Email Comments	Michael Glingor (Baleabaat' Community)	Unique Habitat of Coral Whips: At the end of Wanedai Channel, on the southeast tip, is a very large area of unique habitat made up of coral whips. Coral whips are a different type of coral, and such a large area of this habitat is unique. Here, baby and juvenile fish find refuge among the coral whips mixed with other types of corals. 3D modelling and mapping of this area are important, as is establishing monitoring of potential plumes that could be smothering this habitat. The placement of turbidity monitors and drone surveys to measure plume displacement needs to be implemented.	Whip coral was not observed in the Survey 3 area. We would appreciate the commenter to provide specific details of the whip coral location.
139	Email Comments	Michael Glingor (Baleabaat' Community)	Compensation for Privately Owned Reef: Baleabaat's reef is privately owned, similar to land. Purchasing of reef must occur so those impacted by the loss of property are compensated as required by both Yap State and FSM Constitutions. Compensation should also be provided for areas that will be smothered or otherwise damaged by sediment, not just reef removal through dredging. There are other places in the world where reef is privately owned. This occurs in Indonesia and Papua New Guinea, a well-known area called Misool Resort rents the reef areas, creating a Marine Protected Area. It is not a foreign concept to pay for real estate loss, whether it's land or reef.	Understood. The project team is working with the Yap State Task Force and affected municipalities to determine ownership of submerged lands and fishing rights of proposed dredge areas and evaluate requested mitigation and compensation.
140	Email Comments	Michael Glingor (Baleabaat' Community)	Protected Species: Baleabaat' is known for its reef areas that include protected species such as Bumphead parrotfish, Napoleon Wrasse, Scalloped Hammerhead Shark, and reef Manta Rays (protected under Yap Sanctuary). Wanedai Channel is known to have reef manta rays cleaning in the middle of the channel, while Gubatch is an area of importance for Scalloped Hammerhead Sharks. Vibrations, noise, and dredging activities need to be considered in relation to these species. Additional monitoring measures should be implemented by contractors, not just visual observations from boats or dredging. Drone or other methods of monitoring could be introduced. The year-long survey discussed above would provide the information needed as to protected species behaviors and use of the reef to develop the necessary mitigation strategies.	The duration of dredging the 1.6 acres area on the Baleabaat' side of the entrance channel is approximately 17 days. Underwater noise and dredging are not expected to cause permanent impacts to protected species, and any impacts will be assessed in the EIS and associated protected species consultation documents. The suggestion for drone surveillance is welcomed and will be socialized with Yap State officials

#	Source	Commenter Name	Comment	Response
141	Email Comments	Michael Glingor (Baleabaat' Community)	Storm Surge: During Sudal Typhoon, Baleabaat's community was inundated by storm surge and waves. Ocean water flooded houses along the entire shoreline. Removing a major corner of the reef on either side of the channel could alter the direction of waves and storm surge, potentially increasing storm surge and causing even more destruction. Models need to consider the energy from waves of a typhoon as large as Sudol, along with additional tropical storms that follow. With changing weather patterns and an increase in storm frequency, these factors must be considered. Models should focus on worst-case scenarios rather than best-case scenarios to enable Baleabaat's community to plan accordingly, and for DOW to assist in implementing measures to keep the community safe, including emergency evacuation during a storm such as Sudal.	The project's coastal engineers are conducting rigorous background research and analyses on metaocean conditions to understand the effects of various typhoons that have struck Yap and the potential impacts of future storms with the proposed dredging at the mouth of the channel. Preliminary results from the analyses indicate that the proposed dredging will not exacerbate existing coastal vulnerabilities under typhoon and normal conditions.
142	Email Comments	Michael Glingor (Baleabaat' Community)	Increased activity - roads, noise, lights: Throughout Yap in the evening, sound is meant to be kept to a minimum so as not to bother neighbors. In fact, disturbing the peace is a felony. Within villages, quiet evenings are the norm. Seaport activity during construction and afterwards will boost activity, including noise and light pollution, for the Baleabaat community. The increase in road traffic, noise, and nighttime lights will affect the community. Night construction should consider village quiet times. A stop time must be agreed upon with input from the community. After completion, port activity will rise due to military and "episodic" use. It is essential to establish a maximum limit, which should be agreed upon and strictly enforced. Beyond that, a new IES should be established, and the community must agree on new parameters.	The EIS team is conducting a noise study which would be included in the EIS analysis and help determine best management practices, SOPS, or mitigations, if needed, to avoid or minimize potential adverse impacts from noise. For example, dredging operations will use shielded lights to avoid attracting avifauna and to minimize light trespass and glare to landside observers. The nearest dredging would occur approximately 0.9 miles (approximately 16 city blocks away) from Baleabaat' homes for approximately 17 days . Noise effects at that distance are likely be limited to audible but not disruptive background noise.
143	Email Comments	Michael Glingor (Baleabaat' Community)	Thank you, Kammagar, for thoughtfully considering our concerns and comments. As we move forward with improving the port and airport, environmental impacts must not compromise the health, safety, or food security of the Baleabaat community. While we recognize that some temporary disruptions and effects are unavoidable, we expect strong support during the most difficult times, along with full transparency regarding the nature of these impacts and the Department of War's (DOW) mitigation strategies to address them effectively, and full compensation for our reef and resources that will be taken as a result of DOW's projects.	The EIS team greatly appreciates these provided comments.

#	Source	Commenter Name	Comment	Response
144	Email Comments	James Limar (Gilman Community)	These comments are submitted on behalf of the Gilman community. Under Yapese custom and tradition, we are stewards of our environment and natural resources for future generations. Our traditional land and marine management systems insure preservation of our resources for our children, our children's children, and our children's children's children. Our community also understands that scientific studies can augment traditional knowledge which is why Gilman has been working with marine biologists for more almost ten years. Our comments are divided into general comments and scientific comments.	Thank you for your comments, acknowledged.
145	Email Comments	James Limar (Gilman Community)	General comments: Historically, events at the mouth of the channel impact Gilman from the shore to the reef, including its mangroves, seagrass beds, and the reef itself. During past vessel groundings and storms, Gilman has experienced oil, debris, and sediment that has been carried on the currents into Gilman's waters, damaging its mangroves, seagrass, and reef. DOW needs to consider the impacts of the dredging at the mouth of the channel on Gilman's environment.	Thank you for providing these comments. the EIS will assess impacts of dredging activities.
146	Email Comments	James Limar (Gilman Community)	Further, monitoring is necessary during and after dredging to insure that debris and sediment from the dredge site are not carried to Gilman. The currents along the outer reef are different at different depths and are known to change as the tide moves in and out. Sediment monitoring must be done at different depths to ensure that the reef is not damaged.	Monitoring is planned during dredging operations to ensure turbidity plumes are contained within designated zones. Turbidity monitoring buoys will be deployed around the perimeter of each dredging operation that will alert monitors if Total Suspended Solids (TSS) exceeds an approved threshold which will trigger a shut down of the dredging operation until TSS has dropped below the agreed threshold. This protocol will ensure that sedimentation and turbidity effects are contained with an agreed upon perimeter. The Gilman Community is located approximately five miles to the southwest of the entrance channel. The coralline material to be dredged at the entrance channel is very hard and sediment that is entrained during the excavation work is likely to fall rapidly to the floor of the central channel area.
147	Email Comments	James Limar (Gilman Community)	Gilman is known to be a productive spawning ground for several important fish species, crabs, shellfish, sea cucumbers, and sea urchins. Damage to the Gilman ecosystem will have negative impacts on food supplies for the Gilman community and for the entire island.	Thank you for this important information. The EIS team has heard from many community members that the lagoon serves like a communal "grocery store" and plays a critical role in Yap's food security. The EIS team will take this under close consideration in developing the BMPs and control measures to avoid and minimize impacts to the environment.

#	Source	Commenter Name	Comment	Response
148	Email Comments	James Limar (Gilman Community)	Gilman has several concerns regarding the water supply. As part of the Southern Water System, any events occurring at the airport that damage the water table and sources of water will impact Gilman's water supply.	The airport stormwater management plan has been carefully designed to improve downstream conditions through the use of on-site water quality features and detention basins that will reduce the high velocity, sediment-laden stormwater that currently flows from the airfield drainage systems. The airport stormwater system effects on the downstream taro fields and mangrove forests are also being carefully assessed to ensure appropriate flow levels are protected. During construction and operations, BMPs would be implemented to avoid and minimize potential impacts from spills to groundwater resources. The BMPs will be included in the EIS and would likely include placement of potential contaminants away from groundwater recharge and potable water supplies, secondary containment, spill prevention practices and training, tracking, clean up kits, and spill response plans.
149	Email Comments	James Limar (Gilman Community)	Droughts are common in Yap. DOW must study the impact of a drought and ensure that DOW contractors will not compete with local communities for water. DOW must have a drought management plan.	The EIS will describe current state of water availability, the potential impacts of the project on this resource, and any avoidance, minimization, and mitigation measures to offset potential impacts. Additionally, the airport contractor will be required to develop and execute a water resource management plan that focuses on water conservation (which will include consideration of drought conditions).
150	Email Comments	James Limar (Gilman Community)	During the scoping meetings the possible use of desalination was mentioned. We have concerns with desalination due to the brine by-product that will be produced during the desalination process. How will the brine be disposed of? Allowing the brine to be released within the lagoon will damage the ecosystems in the area. Any disposal of the brine in the Milew area of the lagoon will drift to Gilman destroying Gilman's fragile ecosystem. Disposal of the brine outside the reef but in proximity to the reef will cause the brine to travel on the current impacting Gilman's reef and marine ecosystem.	We will look into ways to mitigate the brine and look at other options besides desalination.
151	Email Comments	James Limar (Gilman Community)	DOW must minimize noise and air pollution such that it does not negatively impact Yap Catholic High School, the Yap Public High School, COM, Yap Middle School, and Gilman Elementary School. Further, flyover of military aircraft during school hours should be avoided to minimize disruption of classrooms.	Yes, we agree. An noise and air quality studies are underway that will inform the EIS evaluation and identify potential community noise impacts and means to avoid and minimize these impacts.
152	Email Comments	James Limar (Gilman Community)	If 24-hour construction is being considered for the airport, the lighting must be such the nocturnal wildlife, such as bats and crabs, are not unduly impacted. Further, lights should be situated such that they are not disturbing nearby homes or impede traffic.	All construction lighting will be shielded to minimize light trespass, community nuisance and attractive nuisance to avifauna.

#	Source	Commenter Name	Comment	Response
153	Email Comments	James Limar (Gilman Community)	When the runway is lengthened on the west side, at least several families will be dislocated from their homes. DOW must consider how relocating these families will impact the village and cultural norms and the ripple effect their dislocation will have on the larger traditional system in Yap. DOW must identify whether any "daef', other traditional structures, or areas of historical significance will be destroyed or impacted during the construction and use of the project areas (both airport and seaport). Further, the impact such destruction or damage will have on the families, village, and municipalities throughout Yap must be assessed as part of the EIS. In determining impacts on cultural and historical sites and practices, the Council of Pilung should be consulted.	Potential effects on people and their homes, traditional structures, and other areas of historical significance west of the airfield will be studied and assessed in the EIS. Impacts in the area will be consulted upon through various processes including discussions with the FSM National Government, Yap State Government, the Council of Pilung and the Yap State Historic Preservation Officer, where appropriate. In addition to the assessment, identification of avoidance, minimization, and mitigation measures to address potential impacts to people dislocated from their homes will be included in the EIS.
154	Email Comments	James Limar (Gilman Community)	There are several sacred areas on the lands surrounding the airport and in the lagoon. The EIS should assess the impacts the construction and finished projects will have on sacred locations and to Yapese culture. Before the EIS is finalized and construction begins, these sacred areas must be identified and protections put in place.	The EIS will assess impacts to traditional structures, and other areas of historical significance, including sacred locations (where shared). Impacts in the area will be consulted upon through various processes including with the Council of Pilung and the Yap State Historic Preservation Officer, where appropriate. We understand how important sacred areas are to the Yapese people, and we're committed to ensuring that these places are respected. It is important to identify these culturally sensitive areas early on so that we can assess the impacts of the project and to avoid, minimize or mitigate these effects when possible. We strongly encourage the community to share information so we are aware of those areas. This will help us make sure we have the right protections in place, like buffer zones or avoidance measures, to protect these important areas. Early collaboration will also ensure that we're meeting both cultural and regulatory requirements, so that we can proceed in the best way possible.

#	Source	Commenter Name	Comment	Response
155	Email Comments	James Limar (Gilman Community)	Scientific comments: The current system flows directly down to Gilman: a strong longshore current moves southward from Wanedai Channel to Yap's southern tip, extending 3.48 km beyond the reef. The reef and flat cover 2.17 km, with currents converging from both sides at that point. This convergence boosts high marine productivity, attracting large fish populations. Water movement is complex, with the current along the southwest often pushing across the reef and creating a counter-current that extends down from the reef crest and pushes northeast for about 2.2 km. This counter-current results from changes in tidal phases. Sedimentation and plumes are carried through the water column towards Gilman, eventually reaching our reefs. The community needs reassurance that monitoring, such as turbidity and currents, will be carried out along the reef at various depths to ensure minimal impact on the reef and fish habitat.	Monitoring is planned during dredging operations to ensure turbidity plumes are contained within designated zones. Turbidity monitoring buoys will be deployed around the perimeter of each dredging operation that will alert monitors if Total Suspended Solids (TSS) exceeds an approved threshold which will trigger a shut down of the dredging operation until TSS has dropped below the agreed threshold. This protocol will ensure that sedimentation and turbidity effects are contained with an agreed upon perimeter. The Gilman Community is located approximately five miles to the southwest of the entrance channel. The coralline material to be dredged at the entrance channel is very hard and sediment that is entrained during the excavation work is likely to fall rapidly to the floor of the central channel area.
156	Email Comments	James Limar (Gilman Community)	Multi-species fish spawning aggregation is a vital part of Yap's fisheries: Gilman hosts the largest known multi-species fish spawning aggregation of key species. Due to its sensitivity, we will not reveal the species. This was discovered in 2016 and confirmed in 2018 when a community project was launched to understand the timing and species involved, including monitoring the events. Changing the habitat through sedimentation would be devastating to the community and for all of Yap. Additional surveys and monitoring during dredging and construction will be necessary to ensure the stoppage or halt to activity until less impact to the habitat. These additional surveys will be an extra cost to our community project. Additionally, we are already noticing that resources allocated to the DOW project are affecting our ability to carry out surveys. Whenever military surveys take place, they use the Manta Ray Bay Resort Boats, which prevents us from conducting our own surveys. This is already happening. The concern is that all boats will be used to meet DOW projects and needs, leaving the communities' needs unmet. This should not occur. Yap projects should be given first priority, and provisions should be made to ensure no disruption to our project. DOW should provide its own boats.	Dredge plume monitoring will prevent plumes from extending to sensitive coastal environments. The EIS team understands the concerns for impacts to critical spawning periods for coral and fish species and has committed to avoiding in-water activities during projected spawning periods. Therefore, no impacts are expected to coral and fish spawning. Dredging duration in the vicinity of Baleabaat' is projected at 17 days, so there should be ample time to work around spawning events, and any impacts to critical spawning periods will be short-term and temporary.

#	Source	Commenter Name	Comment	Response
157	Email Comments	James Limar (Gilman Community)	Fisheries face pressure from growth and illegal fishing: As the population on Yap increases, it will place more strain on local fisheries by boosting demand for fish, which could lead to overfishing, resource depletion, and long-term ecological imbalances that threaten food security and biodiversity. This will directly affect Gilman due to its high fish productivity. Military personnel and DOW contractors should not be allowed to fish within Yap's 12-mile zone.	We understand the concerns about protecting Yap's fisheries. While a total fishing ban on military personnel and contractors is not part of the laws of the State of Yap or the FSM, the project and any future military activities that use the new infrastructure will fully comply with those laws. Planning and operations will be carried out with care for Yap's natural resources, including reef and pelagic fish, and with respect for local customs and traditions. We will continue working with Yap State to avoid and minimize impacts on subsistence and commercial fishing.
158	Email Comments	James Limar (Gilman Community)	With the rise in illegal fishing, there is a need for practical tools and support to monitor and enforce Gilman Waters: As demand for fish increases, the expected rise in illegal fishing will impose an unforeseen burden on Gilman. Its proximity to land and larger reefs makes monitoring and enforcement difficult. Only during very high tides can a boat be launched from Gilman over the reef, which is still 5.33 km away, giving illegal fishermen enough time to leave. There will be a need for Gilman to enforce the waters against illegal fishermen, not only during construction activity, but also with the projected increase in military personnel and civilian contractors during exercises and episodic use.	EIS analysis is focused on reasonably foreseeable environmental effects of the proposed action, not impacts of third party actions such as illegal fishing, however, the EIS will evaluate the potential impacts of the project on public health and safety and socioeconomics and mitigations related to suppression of illegal fishing may be considered if they are a priority for the YUMO Task Force.
159	Email Comments	James Limar (Gilman Community)	Gilman Waters is home to frequent whales, dolphins and pelagic species. Gilman Waters, off Yap's southern tip, teems with whales, dolphins, and pelagic species, drawn by the nutrient-rich high-current system. This productivity supports resident spinner dolphins while serving as a key aggregation site for marine mammals, including orcas, pilot whales, false killer whales, and other protected species. Rising military exercises and sonar use in the area disrupt mammal behavior, migration, and communication, posing risks to these vulnerable populations. To address this, we recommend deploying oceanic gliders equipped with acoustic sensors and cameras to non-invasively monitor species distribution, abundance, and responses around the southern tip. Complementing this, establish community-based training programs in marine mammal research-covering identification, photo-ID techniques, and passive acoustic monitoring-to empower locals for ongoing, sustainable study and protection from within.	There are no current plans for military ship training within 12 nautical miles of Yap and therefore sonar impacts will not be addressed in this EIS.

#	Source	Commenter Name	Comment	Response
160	Email Comments	James Limar (Gilman Community)	Gilman designated as an Important Area for Shark and Rays: In 2024, Gilman, Yap was designated as an "Important Area for Shark and Rays" As this designation indicates, the entire habitat area is crucial for sharks and rays. The concern involves sedimentation that flows down the reef and settles, combined with increased particles in the water column. This is caused by higher fishing activity, which will change the habitat and have a cumulative effect that discourages sharks and rays. Therefore, it is essential for Gilman's habitat to have effective monitoring during the dredge activity, to have effective systems in place to stop dredge activity based on current flows and turbidity levels, and to provide tools for long-term oversight and enforcement to protect these resources for future generations. (ISRA). https://sharkrayareas.org/portfolio-item/g1lman-isra/ Gilman ISRA - Important Shark Ray Areas Gilman is an important area for undefined aggregations of one ray species. Between 2014-2024, recreational dive surveys were conducted in the area (~20 per year between 2014-2019, ~35-40 per year between 2019-2024; J Hartup pers. obs 2024). Mangrove Wh1prays were observed during 75% of dives (range = 1-3 md1v1duals, average = 2) Observations were year round, however survey effort was ...	Monitoring is planned during dredging operations to ensure turbidity plumes are contained within designated zones. Turbidity monitoring buoys will be deployed around the perimeter of each dredging operation that will alert monitors if Total Suspended Solids (TSS) exceeds an approved threshold which will trigger a shut down of the dredging operation until TSS has dropped below the agreed threshold. This protocol will ensure that sedimentation and turbidity effects are contained with an agreed upon perimeter. The Gilman Community is located approximately five miles to the southwest of the entrance channel. The coralline material to be dredged at the entrance channel is very hard and sediment that is entrained during the excavation work is likely to fall rapidly to the floor of the central channel area.

#	Source	Commenter Name	Comment	Response
161	Email Comments	James Limar (Gilman Community)	Airport project drainage is a major concern: One key issue is that drainage from the airport project may further disrupt water flow and cause sedimentation into the mangroves, eventually reaching Gilman. If the airport design and water flow are not properly managed and maintained, the mangroves will die; this habitat change could not only affect the Yinuf mangroves but also spread like cancer throughout nature's pathways down to Gilman. The drainage to the airport must be balanced in flow to ensure mangrove survival and proper sedimentation flows. Placement of flow gauges and sedimentation monitors need to be installed near the airport to track conditions along with alarms to warn of dangerous levels of sedimentation. It is important that monitoring take place during construction with processes in place to identify when additional measures are need to stop the flow of sediment, especially when earthmoving and storm events occur during the same timeframe.	The DOW has initiated a working group of scientists (yap State and DOW) to study downstream water quality and ecosystem resilience with the goal of maintaining a healthy mangrove forest and downstream nearshore conditions. DOW members with contractor support will be conducting surveys and interviews to identify critical factors to maintain ecosystem health which will be documented in the EIS.
162	Email Comments	James Limar (Gilman Community)	Seagrass Bed Habitat: Surrounding Gilman's shores and mangroves are healthy seagrass beds. This habitat is home to juvenile fish, as well as invertebrates such as sea cucumbers, crabs, snails, and sea urchins. Sedimentation from the airport and port construction is of great concern. Increased sedimentation would smother plants and animals. It is essential to monitor not only through turbidity meters but also to have in-water monitoring throughout the entire project by construction companies.	Monitoring is planned during dredging operations to ensure turbidity plumes are contained within designated zones. Turbidity monitoring buoys will be deployed around the perimeter of each dredging operation that will alert monitors if Total Suspended Solids (TSS) exceeds an approved threshold which will trigger a shut down of the dredging operation until TSS has dropped below the agreed threshold. This protocol will ensure that sedimentation and turbidity effects are contained with an agreed upon perimeter. The Gilman Community is located approximately five miles to the southwest of the entrance channel. The coralline material to be dredged at the entrance channel is very hard and sediment that is entrained during the excavation work is likely to fall rapidly to the floor of the central channel area. Current storm water from the airport watershed flows downstream to the Yinuf mangrove forest, unimpeded. The proposed storm water management system includes a range of retention basins and weirs to control flow rates and sediment loads leaving the airport property. Construction best management practices include a range of baffles, sediment basins, channels and swales, and ongoing inspection., maintenance and monitoring to ensure the protective systems remain in working order. Together, these controls should greatly improve downstream habitats, including the nearshore and marine environments.

#	Source	Commenter Name	Comment	Response
163	Email Comments	James Limar (Gilman Community)	Mangrove Habitat Concerns: Around Gilman, mangroves line the shore. From drainage from the airport to the downstream flow of plumes from the port expansion, our mangroves face risks from various impacts. This habitat is vital for our fisheries and food security. Mangroves are also used for medicine and as a resource for our homes. Monitoring of turbidity, sedimentation gauges, and in-person inspections throughout the projects for increased sedimentation or habitat change are requested. This should include examining mangrove health or signs of concern that would "stop" until why it is happening is identified and rectified. Mangroves are also vital to the protection of Gilman, which has a low elevation, from storms and tidal surges.	We share your concern about the importance of healthy mangrove forests for the reasons stated. The proposed dredging and airport construction projects will include onsite monitoring to ensure the best management practices to prevent erosion and sedimentation are effective. Monitors will have authority to stop construction if it appears the controls are not working (e.g., threshold suspended sediments concentrations are exceeded at the project's defined perimeter). The EIS team is examining the health of the mangrove forest downstream of the airfield and in the vicinity of proposed dredged material transfer points in Colonia Harbor to establish appropriate construction-period control measures to avoid and/or minimize impacts to mangrove.
164	Email Comments	James Limar (Gilman Community)	Crab Spawning Aggregation: Gilman, around the full moon. experiences large gatherings of crabs coming together to spawn. Covering the roads, they congregate to reproduce. Any disturbance or imbalance to their habitat caused by sedimentation would be harmful to this aggregation. Special care is needed to ensure no habitat changes occur.	Thank you for outlining this concern. This can be included in BMPs to be followed by the construction contractor (i.e., to avoid roadwork during the referenced crab spawning aggregation periods).

#	Source	Commenter Name	Comment	Response
165	Email Comments	James Limar (Gilman Community)	Gilman, home to many coconut trees: Gilman, on Yap's southern edge, is renowned for its coconut groves, where palms shape the landscape and support local life. These trees produce coconuts vital for nutrition, hydration. and practical uses: fresh meat provides fats and proteins for infants, water quenches thirst, oil is used for cooking and lighting, fermented sap makes alcohol like tuba for rituals, and husks are utilized to make ropes, mats, and baskets for fishing and chores. Historically, copra-the dried kernel-has driven trade since colonial times, under German and Japanese rule, being exported for oil, soap, and cosmetics, which has provided Yap with economic stability and cultural continuity through small industries and tourism. However, potential impacts on mangrove and seagrass beds could ultimately alter the habitat surrounding the palms. Gilman's coconut resources could vanish, risking food security, livelihoods, and Yap's tropical heritage. The EIS must assess the impact on coconut resources and include appropriate mitigations. In addition, Gilman has concerns regarding invasive species. Particular concerns include the coconut rhinoceros beetle, which was introduced into Hawaii by DOW and whose introduction to Yap would devastate coconut and betelnut palms. There are also concerns with the brown tree snake which would devastate Yap's bird population. All efforts must be made to ensure that no invasive species are introduced into Yap during construction and during military operations.	Thank you for describing the important ecological relationship between mangrove, seagrass and coconut trees. The EIS will include a detailed discussion on possible impacts to the mangrove and seagrass beds and measures to be taken to avoid and minimize impacts to these important resources. The DoW is also coordinating with the FSM Government and the Yap State Government on the necessary biosecurity protocols to prevent the introduction and spread of invasive species. The EIS will include a description of the agreed-upon protocols.
166	Email Comments	James Limar (Gilman Community)	Reef flats are vital to community fisheries and cultural fish weirs: Reef flats surrounding Gilman are indispensable to Yap's community fisheries. sustaining both traditional practices and modern livelihoods while embodying cultural ingenuity. Among Yap's most remarkable innovations is the ancient fish weir-a labyrinthine stone structure built on the flats to trap fish during tides-remnants of which still dot Gilman's shallow waters, testifying to centuries-old sustainable harvesting. Today, locals adapt these traditions with hand-cast nets and spearfishing, targeting species in the nutrient-rich shallows to secure fresh catches. As a cornerstone of food security in this remote island setting, the reef flats provide reliable protein amid limited imports; any habitat through the community, undermining nutrition, economy, and ancestral ties to the sea.	The EIS team greatly appreciates these provided comments.

#	Source	Commenter Name	Comment	Response
167	Email Comments	James Limar (Gilman Community)	Gilman is vulnerable to natural and man-made disasters: Gilman located at Yap's remote southern tip, far from the main town and at a low elevation, it faces risks from events like king tides, storm surges, and sea-level rise, which can lead to flooding and erosion. Interconnected ecosystems-reefs, reef flats, seagrass beds, and mangroves-serve as barriers, buffering waves, stabilizing sediments, and reducing flood impacts to safeguard the community. Any habitat changes caused development, pollution, or climate change would increase exposure, by exacerbating food insecurity, damaging infrastructure, and leading to displacement. Immediate comprehensive monitoring-using satellite imagery, on-site surveys, and community participation-must be combined with strict precautions to prevent habitat loss and uphold these natural defenses.	Thank you for explaining Gilman's vulnerability to natural and man made disasters. Monitoring is planned during dredging operations to ensure turbidity plumes are contained within designated zones and do not extend southward towards the Gilman community. Turbidity monitoring buoys will be deployed around the perimeter of each dredging operation that will alert monitors if Total Suspended Solids (TSS) exceeds an approved threshold which will trigger a shut down of the dredging operation until TSS has dropped below the agreed threshold. This protocol will ensure that sedimentation and turbidity effects are contained with an agreed upon perimeter. The Gilman Community is located approximately five miles to the southwest of the entrance channel. The coralline material to be dredged at the entrance channel is very hard and sediment that is entrained during the excavation work is likely to fall rapidly to the floor of the central channel area.

#	Source	Commenter Name	Comment	Response
168	Email Comments	John Rulmal, Nicole Crane (One People, One Reef)	At the request of Rull municipality, in collaboration with the Yap U.S. Military Operations (YUMO) Task Force, the One People One Reef (OPOR) team has compiled a list of comments following the second round of public scoping meetings for the Environmental Impact Statement (EIS) for the Yap Airport and Seaport Improvement Projects in development under the U.S. Department of War (DOW), Yap State Government, and the Federated States of Micronesia. We express our appreciation to the DOW representatives and contractors for their work through this EIS scoping process and to the YUMO Task Force for their leadership. These comments are aimed to supplement the first round scoping comments developed by the Task Force. Leveraging the expertise of our diverse team, we provide our concerns, questions, and corresponding reference literature with the goal of better improving the EIS process. Thank you for your consideration. If you have questions for our team please contact OPOR: John Rulmal Jr. (jrulmal@gmail.com) and Nicole Crane (ncrane@conbio.org), or Rull Municipality Mayor's office Below are comments, suggestions, feedback, and references concerning the information transfer process, as well as the environmental, health, and social/societal impacts of the proposed seaport and airport development projects. We respectfully defer to the knowledge and leadership of the people of Yap, and offer these points to support and complement their voices.	The EIS team greatly appreciates these provided comments.

#	Source	Commenter Name	Comment	Response
169	Email Comments	John Rulmal, Nicole Crane (One People, One Reef)	1) Community Engagement and Information Transfer Given the scale of this project and its location in a region where the constitution includes a 4th branch of government consisting of a council of traditional chiefs, and that information in Yap is shared through customary protocols, we are concerned that these traditional processes are not being properly followed. This affects not only how information is communicated, but also key operational aspects such as access to land and reef areas. These traditional information channels can be complex, and it is crucial to involve the appropriate messengers, advocates, and representatives—particularly traditional village leaders. Based on our participation in the second round of scoping meetings and ongoing community engagement, we have observed a lack of community representation during this process. This may be a direct result of significant gaps in information flow through traditional channels, therefore leading to a lack of active participation from key stakeholders and leaders. We urge the Department of War and Yap project representatives to take these issues seriously and ensure that traditional protocols are respected and followed throughout the meetings and the EIS process.	Thank you for the recommendation. The DoW takes our engagement with the people of Yap and the FSM very seriously and we are committed to ensuring adherence to protocols provided by the YUMO task force and respect to all.
170	Email Comments	John Rulmal, Nicole Crane (One People, One Reef)	2) Traditional Land and Marine Tenure As mentioned in the first round scoping comments, land and marine resources in Yap are privately owned (e.g., by people, not the State or National Government). We seek clarification on how the DOW plans to acquire needed LOCs (Letter of Commitments), OCLs (operation control letters), defense site agreements, and other permissions from land and reef owners needed for operations. We ask the DOW to explain how they plan to adhere to traditional communication channels and local protocols for these lease/transfer agreements. In Yap (generally), land delineation and transfer is given a 30 day public commenting period where a single disagreeing statement can pause leasing and ownership transfer. How will DOW proceed if land delineation and lease agreements are stalled by public comments during this 30 day window? We respectfully ask that these concerns be addressed.	The project team is working with the Yap State Task Force and affected municipalities to determine ownership of submerged lands and fishing rights of proposed dredge areas and evaluate requested mitigation and compensation. The DOW will not be directly acquiring rights from landowners but instead relying on Yap State and FSM , which are more familiar with appropriate procedures, to acquire need rights.

#	Source	Commenter Name	Comment	Response
171	Email Comments	John Rulmal, Nicole Crane (One People, One Reef)	3) Dredging of Channel Entrance Downslope Reef Impacts Although dredging of the Waneday Channel entrance is currently planned to 36 ft, the resulting impacts are not confined to this depth. Loose rubble and sediment will topple down the reef slope, dislodging and smothering downslope corals and other benthic organisms. As such, debris management and the potential impacts to marine life below and adjacent to the proposed dredge depth need to be actively considered within the EIS. Alternative methods, such as the accompaniment of a suction device, should be thoroughly assessed. We request that a calculation of the potential debris field (not just sediment transport) be conducted and announced as part of the EIS. Due to the high biodiversity and productivity observed at these reefs, the EIS should consider impacts of dredging slightly below the 36 ft threshold to allow for coral regrowth and transplantation at the dredge site to facilitate restoration of this important ecosystem. If there is a concern by the engineer/contractor that regrowth would potentially interfere with the dredged area (e.g., fill it in), we request an assessment to determine if that would happen given the very slow growth rate of most corals (and an even slower rate of reef accretion), and the limited height of growth (Toth et al. 2025). A coral reef biologist should assess local or regional coral growth and reef accretion rates to determine whether this is a potential option. In this region, reefs have been determined to group into distinct clusters by benthic and fish community structure. Therefore, the EIS should investigate reef types in Yap to determine the uniqueness of the reef being dredged and its role in supporting fish community structure and biomass (Crane et al. 2017). This will also inform restoration plans. A coral restoration program should be thoroughly assessed both at the dredge site and at other impacted sites. Restoration projects often have limited success, and face challenges due to high costs, high mortality rates of corals, and potential phase shifts to less productive reefs (e.g., monospecific reefs with lower fish biomass; Bernardi et al. 2024; Boström-Einarsson et al. 2020; Mulà et al. 2025).	Dredging is planned to a depth of 12.3 meters (~40 feet) MLLW at the outer entrance channel (shallower depths inland). As presented at the scoping meetings, its is expected that the mechanical extraction by a backhoe or clamshell bucket and the hardness of the coral involved, large intact blocks can be removed and placed in the dredge scow without creating a significant amount of suspended sediments. At the outer channel, some rubble will inevitably roll down the reef slope to the channel bottom. The EIS will include details on what the potential environmental impacts of that would be on the marine environment. There is no interest to encourage coral recruitment on the side slope or new ledge created by the dredging as this would increase frequency of subsequent dredging cycles

#	Source	Commenter Name	Comment	Response
172	Email Comments	John Rulmal, Nicole Crane (One People, One Reef)	3) Dredging of Channel Entrance Dredge Platform During the scoping meetings, the seaport team showed the dredge platform anchored to the seafloor using large vertical shafts. An explanation detailing the installation of these shafts and their environmental footprint will also need to be included in the EIS so that all construction impacts are captured.	The EIS will include a discussion of the dredge vessel anchoring system and potential impacts to marine substrate.
173	Email Comments	John Rulmal, Nicole Crane (One People, One Reef)	3) Dredging of Channel Entrance Dredge Acoustic Impacts on Marine Life We reiterate concerns from the first round comments regarding construction noise for marine life (Erftemeijer et al. 2012). In addition to previously listed species (e.g., manta rays, whales, and dolphins), acoustic impacts to fish swim bladders will also need to be assessed as past research has documented direct impacts of dredging noise on fish behavior and physiology (Wenger et al. 2017). This will be critical given the importance of fish and fishing to subsistence, livelihood, and culture.	The EIS will include a discussion of potential noise impacts to marine life.
174	Email Comments	John Rulmal, Nicole Crane (One People, One Reef)	3) Dredging of Channel Entrance Sedimentation from Dredge Fill Sedimentation can cause damage, including lethal damage and long term stress, to coral reefs and mangrove systems. Mangroves provide a critical defense system to adjacent seagrass and reef systems by trapping sediments, but can also be damaged by excess sedimentation (Carlson et al. 2021; Ellison 1999). Detailed plans regarding dredge fill and maintenance will need to be included in the EIS for all dredge material disposal sites. Specifically, the EIS team will need to survey all proposed sites, including the affected marine environment, to understand the potential impacts of fill runoff. Additionally, a prevention plan for increased sedimentation of dredge materials should be developed.	Dredge material is planned to be moved to upland sites for beneficial reuse. There is potential for some fills that would be designed by the coastal engineer and documented in the EIS following industry best practices.

#	Source	Commenter Name	Comment	Response
175	Email Comments	John Rulmal, Nicole Crane (One People, One Reef)	4) Scientific Methodology Expansion of Survey Area The current NAVFAC terrestrial and marine resource surveys are limited to the Waneday Channel, Yap seaport, and Chamorro Bay. We ask that the DOW and EIS team expand their survey area to contextualize survey results within the greater Yap environment due to evidence of “ridge to reef” impacts (Carlson et al. 2019). Specifically, mangrove, seagrass, and reef surveys downstream of the airport in Rull municipality should be included in ecological surveys to assess the impacts of airport construction. Reef sites along all sides of the archipelago will also be necessary to understand reef ecosystem connectivity and downstream impacts of dredging (Ani et al. 2024; Green et al. 2015; Schill et al. 2015).	Per NEPA guiding policies, the EIS is to use existing reliable data sources and conduct the EIS impact analysis based on "reasonably close causal relationship." The EIS team has coordinated with FSM and Yap State to ensure best available science has been obtained and believe they have enough data to prepare an impact analysis meeting the requirements of NEPA. Thank you for the information on the concept of ridge to reef. This will be considered in the context of affected environment.
176	Email Comments	John Rulmal, Nicole Crane (One People, One Reef)	4) Scientific Methodology Missing Resources Past research conducted by the USFS, NOAA, and other governmental agencies have resulted in a number of resources that may be useful for developing the EIS. For example, the Yap Islands Coastal Resource Atlas developed in 1988 for the U.S. Army Corps of Engineers provides a number of maps depicting land cover, bottom type, and coastal fisheries that can be used to project construction impacts and evaluate potential losses in marine resources (Manoa Mapworks and Sea Grant College Program, Yap Islands Coastal Resource Atlas). To produce the most comprehensive EIS, we ask the DOW and EIS team to seek out these resources and consider them in developing the EIS. If new surveys cannot be conducted, all relevant existing data and materials should be incorporated into the draft.	We appreciate the recommendations.

#	Source	Commenter Name	Comment	Response
177	Email Comments	John Rulmal, Nicole Crane (One People, One Reef)	4) Scientific Methodology Mangrove and Seagrass Habitat Surveys As mentioned in the first round comments, mangrove forests provide a suite of ecosystem services and are culturally important to Yapese communities, and to maintaining seagrass and coral reef health (see above section). Seagrass beds are critical habitats that filter suspended sediments, provide important nursery habitat for several fish species, and hold valuable blue carbon storage potential (Choudhary et al. 2024; Van Katwijk et al. 2010; Verweij et al. 2008). On Yap, mangroves drain into seagrass beds which are adjacent to channels that contain healthy vibrant reefs, despite some having relatively low visibility. Perturbation to the mangroves has a high likelihood of impacting all of these connected systems, as well as potentially to the outer reefs. As such, environmental impacts to mangrove forests and seagrass beds should receive equal attention to coral reefs within the EIS. The EIS team will need to specify whether they plan on using existing data or if they will be conducting their own mangrove and seagrass surveys to project impacts to these critical habitats. A detailed assessment of current mangrove and seagrass extent and ecosystem conditions should be conducted to project how the proposed developments may impact baseline conditions. Specifically, the EIS should address how increased sedimentation might affect mangrove and seagrass ecosystem services, as has been documented in similar systems (Cabaço et al. 2008; Ellison 1999; Guo et al. 2025). We request that the EIS establish an expected range of impacts for the above (seaport and runway projects), so communities of Yap can consider the “worst case” scenario.	The EIS will be based on best available information as well as information that is continuing to be collected. A group of DOW scientists collected wetland and mangrove data on Yap in November, 2025. This information will be used in the development of the EIS.

#	Source	Commenter Name	Comment	Response
178	Email Comments	John Rulmal, Nicole Crane (One People, One Reef)	4) Scientific Methodology Hydrological Models We express concerns over the preliminary results from the EIS team's hydrological models showing a 0.0% change in tidal prism. Model outputs should be reported with confidence intervals, and multiple models should be performed across a range of environmental conditions, including seasonal winds, spring tides, and storm events. The potential loss of mangrove and seagrass habitats due to construction will also need to be considered in model development for tidal changes (van Maanen et al. 2015). In addition to developing hydrological models, the EIS team should collect empirical data to complement model outputs to best predict changes in tidal flow. We ask for model parameters to be specified within the EIS.	The EIS will include a detailed description of the hydrological models, which simulate the movement and storage of water on and beneath the land surface from precipitation to runoff and infiltration. The seaport assessment used coastal modeling, using a coupled hydrodynamic and wave model as described via the presentation to the FSM National Government, Yap State Government, and Yap scientists on Oct 1 during the 'Yap-U.S. Scientific Collaboration', including the site specific data and range of environmental conditions modelled.
179	Email Comments	John Rulmal, Nicole Crane (One People, One Reef)	5) Environmental and Public Health UXO Transport and Disposal Details regarding UXO handling, storage, and disposal need to be properly outlined in the EIS. In the case of an unexpected contamination or detonation, parties responsible for cleanup need to be defined. If private owners offer their land for storage, they should be made aware of potential contamination of soil and water. Furthermore, Yap currently has three water authorities that are each responsible for different water sources and reservoirs. The EIS will need to clarify which water source(s) could potentially be impacted by an unexpected detonation, and which authority(s) will be involved. Mitigation and compensation plans for land owners should also be included.	Details regarding UXO handling, storage, and disposal will be outlined in the EIS. Also addressed in the EIS will be potential impacts from the proposed project to soil and water. In addition to potential impacts, the EIS will also describe avoidance, minimization, and mitigation efforts to offset potential impacts.

#	Source	Commenter Name	Comment	Response
180	Email Comments	John Rulmal, Nicole Crane (One People, One Reef)	5) Environmental and Public Health Per- and Polyfluroalkyl Substance (PFAS) in Drinking Water Concerns over drinking water contamination persist after the second round of scoping meetings. Specifically, the introduction and accumulation of per- and polyfluoroalkyl substances (PFAS) needs to be addressed. PFAS are considered “forever chemicals” as they are particularly resistant to natural degradation and have been linked to a list of health concerns including cancers and reproductive defects (Sunderland et al. 2019). The EIS needs to explain whether construction will require PFAS containing agents and materials (e.g., aqueous film forming foams) and should provide a list of safe alternatives. Consistent monitoring of PFAS should occur pre-, post-, and throughout the construction period to quantify introduced levels of PFAS from development. One potential assessment method is the use of passive samplers which have been shown to be a promising tool in monitoring PFAS levels in estuarine and marine systems (Snook et al. 2025). Such methods for both monitoring and mitigation must be thoroughly evaluated to protect drinking water and agriculture for local communities.	Potable water is a municipal service provided by Yap State. At the seaport, the construction will not affect drinking water source waters as PFAS containing agents are not expected to be in contact with water that could leech chemicals into a drinking water source. Any fire retardant on site for the construction phase will be standard commercial fire extinguishers. The facilities are not expected to have AFFF as a fire fighting system retardant. No changes to water source, storage or supply are required as part of the project with the exception of a small water production facility to service transient aircraft at the new parking apron.
181	Email Comments	John Rulmal, Nicole Crane (One People, One Reef)	6) Mitigation and Monitoring: Temporal Variation in Environmental Responses Impacts to marine and terrestrial ecosystems may arise on both short and long term scales. For example, physical stress from coral relocation can result in coral mortality within weeks or months, while relocating corals to areas with novel environmental conditions may have delayed impacts on coral growth, survival, and reproduction that manifest over several years. Similarly, the impacts of sedimentation on coral survival and reproduction may take years to sufficiently evaluate (Erftemeijer et al. 2012). The EIS should carefully consider the duration of monitoring efforts needed to effectively evaluate both short and long term impacts from the proposed projects, as well as the success (or failure) of the mitigation efforts used to offset or minimize these impacts. In addition what are the contingency plans if the impact is higher than predicted and significant habitat loss occurs.	We acknowledge the need to carefully consider the duration of monitoring efforts to effectively evaluate both short-term and long-term impacts from the proposed airport and seaport projects, as well as the success (or failure) of the mitigation efforts used to offset or minimize these impacts. DoW funding for mitigation and monitoring is limited by the duration and availability of MILCON funding (generally 5-year period of availability and another 5 years for execution, but within this framework, mitigation and monitoring plans will be developed to establish monitoring protocols with appropriate durations and frequencies to detect and assess potential impacts to key environmental resources. In addition, adaptive management approaches will be explored and incorporated where practicable to allow for adjustments to mitigation measures and monitoring protocols based on the results of ongoing monitoring. Where practicable, BMPs and mitigation measures will also include requirements for contingency measures and corrective actions required where measures fail to perform as intended or result in unauthorized impacts.

#	Source	Commenter Name	Comment	Response
182	Email Comments	John Rulmal, Nicole Crane (One People, One Reef)	6) Mitigation and Monitoring: Funding Timeframe During the second round of scoping meetings, the DOW specified a 5-year window within which contracting for mitigation and monitoring must be completed, and a 10-year window in which funds allocated for mitigation and monitoring must be spent. The runway construction is predicted to take eight years, which may leave insufficient time to evaluate the impacts of this development if monitoring must be completed within 10 years of the start of this project. The EIS should address whether this ten-year window for monitoring and mitigation must start when construction begins, or if these efforts can be delayed (where appropriate) to better capture the long-term impacts of the construction.	Airfield monitoring would commence with earth moving activities. Extensive earth moving activities will taper during the second half of the eight-year project allowing monitoring to transition to quasi operational conditions (i.e., during utility installation/paving phases), providing longer baseline to monitor longer term changes.
183	Email Comments	John Rulmal, Nicole Crane (One People, One Reef)	6) Mitigation and Monitoring: Coral Relocation/Restoration The proposed dredging will take place in several locations that have been identified to contain high coral cover and diversity, and it will be logistically infeasible to relocate all corals from the proposed dredging areas as a primary mitigation strategy. Coral relocation efforts to date have been small in extent (Boström-Einarsson et al. 2020), and coral colonies that are relocated tend to undergo some degree of mortality or reduced fitness (e.g., reduced growth or reproductive output) due to physical stress and lack of suitable relocation habitat (Boström-Einarsson et al. 2020; Edwards & Clark 1999; Zakai et al. 2000). Furthermore, the loss of coral from the proposed dredging areas will have cascading effects, as areas that host high coral coverage and experience strong currents (such as the mouth of Waneday Channel) are likely critical sources of coral propagules that supply downstream populations on Yap and neighboring islands (Gouezo et al. 2020; Jones et al. 2009; Storlazzi et al. 2017; Pata & Yniguez 2019). These corals also provide important habitat and spawning grounds for fish populations (Coker et al. 2013; Messmer et al. 2011) that local communities depend on for food and livelihoods, which will also likely suffer enduring losses. Thus, consequences from the loss of coral will not be constrained to the dredged areas, but will extend far beyond the locations and points in time at which the dredging takes place. The EIS should include plans and strategies beyond coral relocation from the dredging areas to offset the inevitable loss of coral. A study on reef connectivity across Yap will provide insight into mitigating such impacts (Ani et al. 2024; Green et al. 2015; Schill et al. 2015).	The project includes the removal of approximately 6.8 acres of coral reef at three general locations within the channel (channel entrance, turning basin and wharf front). This represents about 0.9 percent of the channel area. The loss of 6.8 acres of coral reef is in part offset by improvements to the seaport and airport facilities and the beneficial reuse of the coral material by the municipalities that have oversight. There is a potential to fund the clearing of motile marine species (e.g., clams, sea cucumbers, lobsters, etc.) in advance of in water construction work. Drainage improvement planned at the airfield will vastly improve the quality of stormwater exiting the site and flowing into the downstream watershed, which should improve the health of the mangrove forest and the nearshore environment. The EIS and associated protected species consultation will consider impacts to coral reefs and include mitigation plans and strategies based on the best available science as appropriate.

#	Source	Commenter Name	Comment	Response
184	Email Comments	John Rulmal, Nicole Crane (One People, One Reef)	6) Mitigation and Monitoring: Silt Curtains and Shade Sails Both silt curtains and shade sails have been proposed to mitigate sedimentation in the channel and on land. However, it is unclear whether the design and installation of these mitigation strategies will withhold strong weather events, and how long they remain effective. The EIS should articulate how storm duration, frequency, and intensity are incorporated into the implementation of silt curtains and shade sails, and the threshold for success agreed upon for these mitigation efforts, especially considering the increased likelihood of extreme weather events.	Silt curtains will be used in tandem with turbidity meters deployed outside the silt curtain perimeter to ensure turbidity levels outside the curtains remain within levels determined to be most appropriate. If observed readings exceed limits, dredging operations will cease until the project biologist/monitor is satisfied that operations can resume (i.e.. to allow sediments to settle out of the water column and/or reposition curtains to be more effective). The EIS and protected species consultations will include the best available science and data on the effectiveness of silt curtains during in-water dredging activities. During strong weather events/storms, dredging work will cease and silt curtains will be removed from the water. Silt curtains have been proposed for all dredging areas except the outer channel where ocean energy levels are typically too high to deploy and maintain curtains safely. However, if sea conditions at the entrance are determined to be within appropriate parameters and local pilots, MSC, and the Port determine that there would not be a navigation hazard, the contractor may opt to use them during that time.
185	Email Comments	John Rulmal, Nicole Crane (One People, One Reef)	6) Mitigation and Monitoring: Mitigation for Mangrove and Seagrass Habitats The EIS must address the potential loss of mangrove forests and seagrass beds due to construction, and outline comprehensive mitigation strategies for these ecosystems. These plans should account for the possibility of failure and include measures to be taken if the environmental impact exceeds predictions, leading to long-term consequences for the people who rely on these ecosystems for their livelihoods.	The marine baseline study (NAVFAC PAC 2023) identified several areas of seagrass habitat in the areas affected by dredging. The EIS will evaluate the potential impacts of the project on the mangroves and seagrass habitats. These habitats will be protected to the extent practicable through the use of turbidity meters, silt curtains and rigorous monitoring. Where these habitats cannot be protected, mitigation will be implemented. These mitigation measures will be coordinated with the Yap State Government and scientists.

#	Source	Commenter Name	Comment	Response
186	Email Comments	John Rulmal, Nicole Crane (One People, One Reef)	6) Mitigation and Monitoring: Targets for Mitigation and Contingency Plans The EIS should include clearly outlined targets for evaluating the success of each mitigation plan (e.g., number of coral colonies relocated that survive after a certain number of years, amount (area) of live coral cover rehabilitated, fish biomass maintained at or near pre-impact level, number of planted trees that survive after a certain number of years etc.). Additionally, the EIS should include contingency plans for alternative strategies if monitoring reveals that these targets are not being met, as well as adaptability to pivot toward these contingencies if and when planned mitigation strategies fail (e.g., active coral restoration programs through use of on-land or underwater nurseries). Developing such targets will require baseline data that will need to be collected, including from mangrove and seagrass habitats that are not included in past NAVFAC surveying.	The principal EIS strategy is to avoid and minimize harm to the environment through careful planning, close monitoring to keep the prime contractors accountable, and maintaining an open dialog with Yap stakeholders. The loss of 6.8 acres of coral reef is in part offset by improvement to the seaport and airport facilities and the beneficial reuse of the coral material by the municipalities that have oversight. There is a potential to fund the clearing of motile marine species (e.g., clams, sea cucumbers, lobsters, etc.) in advance of in water construction work. Drainage improvement planned at the airfield will vastly improve the quality of stormwater exiting the site and flowing into the downstream watershed, which should improve the health of the mangrove forest and the nearshore environment. Silt curtains are proposed to be deployed only duration construction dredging activities, which will not occur during elevated sea states.
187	Email Comments	John Rulmal, Nicole Crane (One People, One Reef)	7) Infrastructure Assessment, Development and Maintenance Waste and Trash Disposal High volumes of wastewater are likely, considering the scale of the proposed projects and the number of workers involved. Unrestrained and unprocessed wastewater moving into coastal ecosystems can have significant negative impacts on these biological systems. The EIS will need to investigate whether Yap's current waste disposal program is sufficient to manage the anticipated waste from construction and the arrival of foreign workers. Ultimately, the EIS will need to specify the parties responsible for waste disposal and long-term maintenance of infrastructure projects. Additionally, solid waste is a separate issue and should be addressed directly in the EIS. Disposal of accumulated solid waste needs to be considered, as well as the potential need to remove such waste from Yap (or possibly incinerate it) rather than increase the landfill. Plastic waste (micro and macro) can be particularly damaging to ecosystems and mitigation for this likely increased volume of solid plastic (and other) waste should be considered (Muniz & Rahman 2025; Nama et al. 2023; Tekman et al. 2022).	Yes, the EIS will evaluate the potential impacts of the proposed construction and training on wastewater and solid waste resources and will identify management procedures, including compliance with the substantive requirements of the Clean Water Act and Solid Waste Management Act of the U.S.

#	Source	Commenter Name	Comment	Response
188	Email Comments	John Rulmal, Nicole Crane (One People, One Reef)	8) Sociocultural Impacts Social Impact Assessment (SIA) A comprehensive social impact assessment (SIA) that extends beyond socioeconomics and historic/cultural resources is needed to fully understand the depth of social impacts resulting from the proposed projects. Such an assessment should seek to catalog current users and usage of terrestrial and marine spaces, and how construction may alter resource users, usage, and management. A comprehensive SIA should also consider potential societal and demographic impacts following airport and seaport development. This will require a deep understanding of the unique history of militarization and outmigration within the Micronesian region (Bautista 2010; Scourse & Wilkins 2009), as well as a reflection on the impacts of US militarization and military hegemony on communities in other geographies (Tsuchibuchi 2023).	The EIS will use information collected through a socioeconomic study conducted in coordination with the Council of Pilung (traditional leaders), the Yap HPO, and the Yap State Task Force. The authors of the EIS will familiarize themselves with the sources cited for potential application.
189	Email Comments	John Rulmal, Nicole Crane (One People, One Reef)	8) Sociocultural Impacts Food Security and Food Sovereignty Increased US and military presence will likely alter traditional foodways following the influx of Western workers, technology, and foodstuffs as a result of the proposed projects. A reduction in marine resources following construction combined with increased access to Western foodways may change how communities realize both food security and food sovereignty. Such changes should be documented in the EIS as it carries both cultural and health implications (Hughes & Lawrence 2005; Snowdon et al. 2013)	Food security and sovereignty will be addressed in the EIS. Note, the proposed action does not envision any increased permanent party military personnel on island. As discussed, personnel will support between 2-4 training exercises per year housed in transient quarters in the planned airfield support area (w/in the airfield boundary)
190	Email Comments	John Rulmal, Nicole Crane (One People, One Reef)	9) Data Ownership and Sovereignty The process of developing this EIS will require an enormous amount of data curation and collection from both public and privately-owned land and reefs. We ask that the EIS team clearly explain the ownership and usage of these data to communities and property owners, specifically how each dataset will be used and the potential benefits and consequences of providing data. After the EIS is developed, how will the data be stored and managed? Who will have access? Will the raw data be included in the EIS? Information and transparency surrounding data ownership and sovereignty will need to be provided prior to data collection.	The EIS and all the studies and assessment used to inform the EIS analysis would be publicly accessible and stored on the project official website. The U.S. does not claim copyright. Supporting data that is not posted to the website will be provided to Yap State and the FSM where practicable/permissible.
191	Email Comments	John Rulmal, Nicole Crane (One People, One Reef)	List of References (See attached comment letter).	Thank you for providing these references.

#	Source	Commenter Name	Comment	Response
192	Email Comments	Thomas G. Tun	On behalf of the Yap U.S. Military Operations Task Force (YUMO Task Force), we submit these second-round environmental scoping comments on the Environmental Impact Statement (EIS) for Infrastructure Improvements at the Yap International Airport and Yap Seaport in Yap State, Federated States of Micronesia. We thank the Department of Defense for hosting a second round of scoping meetings and providing additional opportunities for community input. The Task Force appreciates the continued engagement and the information shared during the recent scoping sessions. We note that all comments submitted during our first round of scoping have been documented and will be used in drafting the EIS. In those initial comments, we identified areas where there were gaps or where additional information was needed to accurately identify potential impacts. The concerns we raised regarding the use of best available science, the need for a comprehensive impact assessment, and the importance of meaningful community participation remain central to ensuring a thorough and balanced review of this project. The Task Force is concerned by recent statements that DOD will not share the underlying data or models used to reach conclusions about environmental impacts. How DOD determined impacts is crucial information for community review. The absence of adequate baseline data cannot be used to support conclusions that no significant impacts will occur to the Yap community. Public participation in the NEPA process requires transparency about the scientific basis for impact determinations. Without access to the data and methodologies behind these assessments, neither the community nor independent scientists can meaningfully evaluate the adequacy of the environmental analysis. It is also important to clarify the Task Force's role in this process. The Task Force has helped identify alternatives for DOD's consideration and evaluation. The Task Force does not select 'options, sites, or make decisions about project elements such as dredged material placement locations or laydown areas. The DOD is ultimately responsible for identifying, evaluating,	Acknowledged. The EIS and all the studies and assessments used to inform the EIS analysis would be publicly accessible and stored on the project official website.

#	Source	Commenter Name	Comment	Response
193	Email Comments	Thomas G. Tun	1. Jet Fuel Environmental Impact Assessment The EIS should comprehensively study the potential impacts of jet fuel on trees, native plant species, native wildlife, including birds and fruit bats, and community health. This analysis should include effects from 'fuel vapors during normal operations, potential spill scenarios, and cumulative exposure impacts on both terrestrial vegetation and human populations. The assessment should evaluate how jet fuel emissions and vapors could affect adjacent agricultural areas, native forest ecosystems, and air quality in nearby residential communities. Potential spill scenarios should include assessment of potential contamination of drinking water, as well as contamination of surface water that could runoff into the nearby mangroves and taro patches.	The EIS will include a detailed analysis of potential air quality impacts from all relevant sources including fuel. The EIS will also be analyzing potential impacts to water and natural resources and include BMPs, SOPs, and mitigations, if required, to avoid or minimize any adverse effects.
194	Email Comments	Thomas G. Tun	2. Dredging Impact Models and Analysis Access We reiterate our request to review the models and analysis that DOD has used to assess the impacts of dredging operations. The EIS should provide complete access to hydrodynamic models, sediment transport predictions, and water quality impact assessments. All modeling assumptions, input data, and validation methods should be clearly documented and made available for independent review. The community cannot provide informed input without understanding the scientific basis for impact predictions. Modeling should take into account studies of the currents that dispersed oil and sediment during and after vessel groundings.	The U.S. Government arranged for a brief by the coastal engineer leading the study to share this information with the FSM and Yap State Government and their scientists and provided a copy of the brief to the FSM and Yap State Governments. The report will be shared with the FSM and Yap State Governments once it is complete.
195	Email Comments	Thomas G. Tun	3. Total Marine Resource Impact Quantification The EIS should include a comprehensive analysis of total impacted reef and marine resources, both direct and indirect. During recent meetings, the Port Design Team represented that these figures are available. The assessment should distinguish between areas of direct physical impact and areas o indirect impact from sedimentation, noise, or other construction effects, and provide quantitative measurements of affected habitat area and resource loss.	The purpose of the EIS process is to analyze the impacts of the proposed action on environmental resources and include best management practices, SOPS, or mitigations, if needed, to avoid or minimize adverse impacts.

#	Source	Commenter Name	Comment	Response
196	Email Comments	Thomas G. Tun	4. Fuel Storage and Operations Analysis Recent discussions have highlighted the need for comprehensive analysis of fuel storage operations. The EIS should address where fuel will be stored, the source of fuel supplies, transportation methods to the island, and who will have access to fuel hydrants. There have been previous representations that the U.S. would purchase jet fuel from local providers, but this arrangement requires clear documentation and impact analysis. The EIS should also specify what types of military exercises will require fuel transport and storage at the airport, as different exercise types may have varying fuel requirements and associated environmental risks. If jet fuel is purchased from local providers, the EIS should also identify whether additives will be needed to make the fuel usable for military aircraft, what additives will be needed, where the additives will be stored, where the additives will be combined with the jet fuel, and the impact of these activities on the environment and community, including analysis of possible spillage of the additives on drinking water and surface water that will flow into the mangroves and taro patches.	We greatly appreciate your suggestions. The airport fuel system is currently being developed and may require additional modifications. The EIS will assess current plans for fuel storage and system operations, identify possible avoidance/minimization measures (e.g., secondary containment, spill prevention plan, etc.), and analyze impacts.
197	Email Comments	Thomas G. Tun	5.Terminal Location Alternative Assessment The EIS should evaluate relocating the main terminal building so that it is adjacent to the taxiway rather than the runway as an alternative design option. This alternative could potentially reduce noise impacts on terminal operations, improve safety by separating civilian and military aircraft operations, and provide more flexibility for future airport expansion. The analysis should compare operational efficiency, safety benefits, construction costs, and environmental impacts of this alternative configuration. As the expanded runway will accommodate increased capacity for larger cargo and increased commercial passengers, the EIS should also consider project upgrades, improvements, and expansion of the existing airport terminal to enable enhanced capabilities to process and accommodate larger inbound and outbound passenger, luggage, and cargo loads.	The purpose and need for the airport project does not require relocation of the airport terminal to meet mission need, so relocation of the terminal cannot be justified for direct inclusion into the project at this time. Therefore, it will not be included as an alternative in the EIS. However, the U.S. has agreed to look into options for relocating or updating the existing airport terminal with the understanding that the rest of the project would move forward on schedule. A desktop study of the terminal will be done to assess the existing condition and provide recommendations for any repairs, reconstruction, or relocation if needed.

#	Source	Commenter Name	Comment	Response
198	Email Comments	Thomas G. Tun	6.Enhanced Noise Impact Analysis The EIS should include comprehensive noise analysis with specific peak decibel level measurements for all proposed aircraft operations. The assessment should identify all homes, schools, churches, and other community structures that may experience noise levels incompatible with their intended use and specify mitigation measures for each affected structure. There has been significant confusion about operational frequency that requires clarification. Initial representations suggested exercises would occur only 14 days per year, but DOD has since indicated that "episodic" use could occur 1 to 2 times per week. This represents a substantial increase from current baseline operations of only 3 flights per week, and even one additional flight per week represents a 25% increase over current operations.	The EIS team is completing a noise study for the construction and operational activities for the Proposed Action. The study will identify noise sensitive uses near the project areas, potential noise impacts to those uses, and avoidance, minimization, and mitigation measures to reduce or mitigate potential impacts. The EIS will include a discussion of potential impacts, best management practices, SOPS, or mitigations, if needed, to avoid or minimize potential adverse impacts.
199	Email Comments	Thomas G. Tun	7.Unexploded Ordnance Protocol Unexploded ordnance from WWII operations was mentioned during recent briefings as a potential concern. The EIS should include comprehensive protocols for detecting, handling, and 'disposing of any unexploded ordnance discovered during construction activities. This should include safety procedures for construction workers, community notification protocols, coordination with appropriate military explosive ordnance disposal units, and coordination with Yap State's Division of Public Safety and Department of Health Services.	The EIS will address unexploded ordinance in its public health and safety discussion.
200	Email Comments	Thomas G. Tun	8.1 Yap State Hospital During the construction, the Yap State Hospital will need to be able to respond and provide necessary medical care to increased numbers of individuals over an extended period of time and will need to be able to respond to workplace injuries that it does not usually see. Also, the Hospital will need to be able to treat the health impacts on Yap's citizens that will be caused by these projects. The EIS should address the impact on the Yap State hospital and health care system of having an increased number of laborers on island for this extended period of time and the health impacts on Yap's citizens and include improvements to the hospital and health care system to ensure that the hospital can provide proper medical care.	The EIS will evaluate baseline conditions at the Yap State Hospital and potential impacts on the island's healthcare system associated with the increased population during construction and training exercises. Additionally, the construction contract would likely require the contractor to provide its own medical professionals (e.g., doctor and/or paramedics). There would also be medical evacuation procedures in the case of a serious medical incident. Local Yapese workers would have the same access to these medical resources as workers from off-island.

#	Source	Commenter Name	Comment	Response
201	Email Comments	Thomas G. Tun	8.2 Southern Water System Protection The EIS should address protection of the Southern Water System supply pipe that traverses the airport area. It remains unclear whether the proposed southward runway extension will be constructed over this critical water infrastructure. The final design should include provisions to relocate the water pipe to avoid construction damage and ensure continued reliable water service to southern communities during and after construction.	The EIS will address protection to the Southern Water System supply pipe that traverses the airport area. The design team is coordinating with the associated stakeholders and to avoid or minimize potential impacts in potable water service.
202	Email Comments	Thomas G. Tun	8.3 Village Road Safety and Management Construction vehicle traffic on roads through villages raises significant safety and health concerns. The road south of the airport passes through residential areas where children play and walk to school. The proposed transportation of Tomil dredge material involves 9 trucks making 250 trips each per day, representing 4,500 miles of heavy truck traffic daily on roads not designed for such use. The EIS should establish construction traffic schedules that avoid school hours, include dust suppression measures, and implement noise controls to protect community health and safety.	The EIS will include a noise study and a traffic study to inform the establishment of best management practices and avoidance/minimization measures to reduce potential impacts on communities adjacent to haul routes or other areas affected by construction related traffic.
203	Email Comments	Thomas G. Tun	8.4 Dredge Material Storage Environmental Controls The proposed storage of dredge material from Tomil operations at heights up to 30 feet creates multiple environmental risks. The EIS should address whether material will be treated to remove salt water before placement to prevent groundwater contamination of the nearby Gagil/Tomil water table. The assessment should include geotechnical stability analysis and specify engineering controls to prevent slope failure that could damage nearby homes, gardens, and habitat.	The EIS will identify standard operating procedures, safety measures, and environmental controls for dredge material offloading and storage, including dewatering (if necessary) and geotechnical stability. Additionally, mechanical dredging will reduce the salt water content of the material in comparison to other dredging techniques.

#	Source	Commenter Name	Comment	Response
204	Email Comments	Thomas G. Tun	8.5 Historical Site Protection The proposed dredge material storage field in Tomil has been identified as a former WWII Japanese airstrip. The EIS should include comprehensive archaeological surveys to identify and catalog any remaining historical artifacts before material placement.	Thank you for your comment. Archaeological surveys are one of many different types of studies being conducted within the area of potential effect of the proposed undertaking. Specifically, the proposed dredge material storage field was surveyed and found not to be located at the Gagil-Tamil location (Tamil Airfield) south of the sports complex. The results of this survey will be included in the EIS. However, we are happy to accept additional information about the proposed dredge material storage location so we may incorporate it into our analysis.
205	Email Comments	Thomas G. Tun	8.6 Seaport An enhanced and extended wharf will necessitate an improvement in required capacity to handle larger cargo and/or passenger capacities. DOD should consider projects to provide and install equipment capable of efficiently and effectively providing on/offload functions and associated seaport ground handling equipment, including forklift capabilities.	We greatly appreciate your suggestions regarding seaport capabilities. The EIS will analyze the impacts of the proposed action on environmental resources and include best management practices, SOPs, or mitigations, if needed, to offset adverse impacts.
206	Email Comments	Thomas G. Tun	9. Data Repository and Source Documentation The EIS should include creation of a publicly accessible repository documenting all materials and sources that DOD has relied upon in developing the environmental analysis. We understand this would not include copyrighted materials, but the repository should identify where such materials can be located. When DOD is unable to produce specific documents or sources, the EIS should explain what information was unavailable and how this affected the analysis. This transparency is essential for meaningful public review and independent scientific evaluation.	The EIS will include a full list of references utilized in the development of the EIS, and these references will be incorporated into the project administrative record. The EIS and all the studies and assessments developed by DoW to inform the EIS analysis would also be publicly accessible on the project official website.

#	Source	Commenter Name	Comment	Response
207	Email Comments	Thomas G. Tun	10. Economic Impacts Due to Change in Flight Schedule The EIS should address the economic impact that will be caused by the change in flight schedule due to the airport construction. The current flight schedule with three flights (2 United flights and 1 APA flight) on different days allows small businesses to export perishable items three days a week. Reducing the number of days on which there are flights capable of carrying exports will impact local businesses, especially those exporting betelnut and fish to the Guam market. The impact will affect businesses on Yap and Yapese businesses on Guam, whose owners send remittances to family in Yap.	The US DoW is coordinating with the Yap State Task Force and local stakeholders on potential changes to flight schedules. Any potential changes would be developed in coordination with those stakeholders and the impacts of those changes would be evaluated in the EIS. Additionally, the socioeconomic interviews include questions on potential impacts to exporting associated with changes in the flight schedule to help inform the analysis in the EIS.
208	Email Comments	Thomas G. Tun	11. Community Comments 11.1 Lack of Data Necessary for Rull and Tomil Communities to Comment During the September scoping meetings, the Rull and Tomil traditional leaders requested that DOD mark the area in the channel where the dredging for the harbor project is proposed because the communities could not tell from the DOD maps where the dredging will take place. As was 'communicated to DOD, the Rull and Tomil communities need the reef marked so that they can determine their resources that will be impacted by the proposed dredging and to provide comments during this scoping period. During the September 23, 2025, DSWG meeting, YUMO was informed that the reef will not be marked until late October/early November, a month after the scoping commenting period has ended. Because DOD has not marked the reef prior to the close of the commenting period, the Rull and Tomil communities have not had an adequate opportunity to provide comments.	The US DoW will continue to coordinate closely with the Yap State Task Force regarding outreach to local communities and providing opportunities for them to provide input into the EIS analysis and process. The second round of scoping ended on September 29, 2025 and the public will have another chance to comment on the EIS during the Draft EIS public review period.

#	Source	Commenter Name	Comment	Response
209	Email Comments	Thomas G. Tun	11. Community Comments 11.2 Community Comments not Recorded A review of the Responses to First Round of Public Scoping Comments provided by DOD to YUMO raises concern that comments from Yap citizens have not been included. It is YUMO's understanding that substantial comments were submitted by Ms. Jennifer Chieng which do not appear to be reflected in the Response to First Round of Public Scoping Comments. Because the comments are not collected by Yap State or YUMO, YUMO cannot independently verify that all comments submitted by the community are reflected in DOD's Response chart. YUMO respectfully requests that DOD verify that all comments have been recorded and are being addressed.	We do not have record of comments, substantive or otherwise, that were submitted by Ms. Chieng. All comments received during the scoping meetings, as well as those sent to the email address provided, have been addressed in the comment matrices for both rounds of scoping. No hard copy mail comments were received during either round of scoping.
210	Email Comments	Thomas G. Tun	The Task Force continues to support meaningful environmental review that employs the best available science and ensures full community participation in decision-making. The issues raised during recent scoping meetings reinforce our earlier concerns about the need for comprehensive impact assessment, transparent data sharing, and genuine consultation with affected communities. In closing, as requested, we have attached additional detailed technical comments by impact category. These comments provide specific recommendations for addressing the deficiencies identified in our review of available project materials and include an extensive list of scientific resources and studies that represent available science that DOD should consider when preparing the EIS. This compilation of research spans decades of environmental, cultural, and biological studies specific to Yap and provides the scientific foundation necessary for comprehensive impact assessment. Please find Yap States detailed technical second round comments enclosed herein. We look forward to continued dialogue and meaningful collaboration as this process moves forward.	Thank you for your participation in the scoping process. Please see responses to the technical comments below.

#	Source	Commenter Name	Comment	Response
211	Email Comments	Thomas G. Tun	1. MARINE ENVIRONMENTAL MONITORING AND MITIGATION 1.1 Biological Monitoring Requirements Clearly defined and required tasks for contractor biological monitors: biological monitors should have clearly defined tasks that encompass the wide range of potential harmful impacts to marine life. This would include wildlife observation of sensitive species, drone-based or remote sensing-based plume monitoring, and snorkel-based surveys for sedimentation of coral reef and seagrass habitats during the dredging process. Similar to the contractor requirements for specific lighting of the dock during construction, these specific biological monitoring tasks should be required of the contractors.	Specific tasks and requirements for biological monitors will be identified in the EIS and will be based on well-established best management practices for in-water dredging and construction. These tasks will be coordinated with the Yap State Task Force and will become part of the environmental compliance requirements for the construction contractor.
212	Email Comments	Thomas G. Tun	1. MARINE ENVIRONMENTAL MONITORING AND MITIGATION 1.2 Turbidity Monitoring System Turbidity monitors located both near dredged areas and within habitats, and especially in areas important for fishing, recreation, and tourism. Turbidity monitors should be placed both near the dredging operations, and within habitats near dredging operations. This is especially important near the mouth of the channel, where silt curtains will not be deployed and sedimentation of nearby habitats is of greater likelihood. Turbidity monitors should additionally be placed at increments along the reef towards the south since local knowledge and experience suggests sedimentation will travel in this direction. Turbidity monitors should also be placed various depths to insure that the direction that sediment is being moved by currents and the amount of sediment being moved is captured. Clearly defined and research-based turbidity limits that will initiate a stop work order if exceeded. Turbidity limits in coral reefs and seagrasses should be determined based on the scientific literature. Turbidity monitor levels need to be increased during incoming tide and turned down during outgoing tides to ensure events during incoming tides are captured since water will be clearer.	Specific procedures for turbidity monitoring will be established in the EIS based on an evaluation of local conditions, the sediment plume dispersion modeling results, and best available scientific literature on turbidity impacts to marine habitats. This would include a turbidity threshold level that would initiate a stop work order if exceeded.

#	Source	Commenter Name	Comment	Response
213	Email Comments	Thomas G. Tun	1. MARINE ENVIRONMENTAL MONITORING AND MITIGATION 1.3 Sediment Accumulation Monitoring Monitoring of tagged corals and seagrass plots of sedimentation: Although a sediment plume may not be severe enough to trigger a turbidity meter at one point in time, the sediment may slowly continue to be released, settle on the bottom, and accumulate during the duration of dredging. Monitoring of plots with photography or using rulers or sediment pins are a simple method to help ensure plumes that do not immediately trigger a turbidity monitor will not slowly cause sedimentation over time.	The sediment dispersion model will anticipate both potential turbidity impacts as well as sediment deposition/accumulation associated with dredging activities. The EIS will evaluate and recommend monitoring methods such as turbidity monitoring and/or sediment accumulation monitoring to ensure that potential dredging impacts are in line with expected impacts presented in the EIS.
214	Email Comments	Thomas G. Tun	1. MARINE ENVIRONMENTAL MONITORING AND MITIGATION 1.4 Biological Timing Considerations Monitoring of coral spawning, seagrass flowering, and fish spawning to establish times to avoid: Scientific monitoring and potentially consultation with local water users should occur to help identify time periods during which spawning occurs. Dredging and pile driving activities should avoid these times. Using local data as much as possible instead of generalizing spawning seasons based on observations from other parts of the world should also be prioritized since there may be differences between geographic locations.	In-water construction activities will avoid coral spawning, seagrass flowering, and fish spawning to the extent feasible. The EIS team will review best available data and consult with local experts to identify time periods that should be avoided, and those time periods will be presented in the Draft EIS for public review. The EIS and associated protected species consultation will include impact assessment of increased turbidity levels to coral reefs and include mitigation plans and strategies based on the best available science and as appropriate. Based on previous in water dredging activities,

#	Source	Commenter Name	Comment	Response
215	Email Comments	Thomas G. Tun	1. MARINE ENVIRONMENTAL MONITORING AND MITIGATION 1.5 Silt Curtain Management Adaptive management of silt curtains: A previous dredging project in Colonia Yap found that silt curtains six to ten feet long did not sufficiently contain sediment, with sediment moving under the curtain as well as holes in the curtain, causing a sediment plume to move east and southeast of the dredging area. (page 4 & 6 of Strong et al. UOGML technical report no. 78). The current project proposes similar sediment curtain lengths to 2-4m. Real time monitoring that shows large plumes should initiate adaptive management of silt curtains, including checking for damage, conducting repairs, modifying if unexpected currents occur, and potentially extending curtains to deeper depths. Reliance on gravity as a mitigation measure for channel dredging. Given the natural flow in Wanedai Channel coupled with the fact that the area to be dredged on the Tomil side of the channel is made up of fine sediments, there is concern that excluding silt curtains and relying on gravity for the sediment will not be enough. Given local observations from the movement of oil from the Kyowa Violet ship coupled with conversations with community members (Figure 1), it is clear that water will likely move any suspended sediment over the adjacent reef or to the German Channel. A Tomil community member also reported that past dredging activities off of the coast of Tomil (star symbol in Figure 1) resulted in increased sedimentation near the mouth of the German Channel. Other dredging methods and mitigation options should be considered and modeled to not solely rely on gravity. Figure. 1. The white arrows designate water flow based based on conversations with community members of Tomil and Rull. Water will likely move any suspended sediment over the adjacent reef or to the German Channel. Star symbol represents where dredging occurred in the past and resulted in sediment being deposited near the mouth of the German Channel.	The design and specific requirements for silt curtains will be identified in the EIS and will be based on well-established best management practices and best-available science. The EIS team will consider the observation from the referenced report as well best available science on the current design and effectiveness of silt curtains to establish requirements for the construction contractor. Based on previous observations of in-water dredging activities, BMPs will reduce the likelihood of visible turbidity outside the silt curtain perimeter.

#	Source	Commenter Name	Comment	Response
216	Email Comments	Thomas G. Tun	2. HYDROLOGICAL AND SEDIMENT MODELING 2.1 Wanedai Channel Modeling Requirements Modeling in Wanedai Channel. In Yapese, Wanedai means way of the water. The Yapese named the channel Wanedai Channel to describe how the water flows from one side of the island from Wanedai through German Channel to Mi'l Channel and back. There is a traditional understanding of the water flow and how it impacts the entire island. The hydrological model determining' the area of impact from the dredging needs to include wave, wind, current, storm, and tidal data to appropriately model the flow of the sediment at varying depths as well as the movement of water. The dredging activity will affect more than tidal prism; it will affect water velocity and wave formation due to the straightening of the channel and the increase in depth of the dredge area. A paper that was left out of the baseline marine survey, which should be 'considered as a baseline when planning the hydrological model can be found here: https://www.uog.edu/_resources/files/ml/technical_reports/45Tsuda_et_al_l978_UOGMLTechReport45.pdf. What hydrological model was used, and what data sets were used to parameterize the hydrological model? Results shared at the second scoping meeting revealed that the dredging of the channel will have a minimal impact on the tidal prism or volume of water entering the bay. What still has not been shown or is known is the impact to flow, wave energy, or wave buildup. Curves in channels significantly slow down water movement. Dredging at the mouth will straighten that portion of the channel and will allow bigger ships to make that turn as noted in the documents and presentation. Straightening of the channel will also increase water velocity and wave energy, especially during major storm events like Typhoon Sudall in 2004, where wind and wave action pushed the Mnuw ship/restaurant onshore. Dredging the coral will also make that portion of the channel deeper, reducing the ability of that reef to dissipate wave energy, further leading to increased water velocity as well as wave height (Ferrario et al. 2014; Keyser et al. 2020). What sediment model was used to predict sediment movement under worst-case scenarios and what data was used to parameterize the model? Furthermore, what was the	Unfortunately, we were unable to access the link provided in the comment. Through an online search, we believe that the link was for the University of Guam Marine Laboratory Technical Report #45, published in 1978, "Distribution, relative abundance, and biomass of marine benthic algae in the Pago Bay, Guam, reef system", authored by R.T. Tsuda and F.O. Bryan. The information in this technical report does not appear to be relevant specifically to hydrodynamic modeling or changes to hydrodynamic conditions in a reef system. Tidal prism describes the total volume of water that enters an inlet or embayment during a flood tide, and exits during an ebb tide. Therefore, the assessment of change in tidal prism (due to the proposed dredging) does consider water velocity. The hydrodynamic model is coupled to a spectral wave model, thus considering waves. Details of the models, data and analysis performed was described in a presentation made on Oct 1 to the Yap Task Force and Yap State scientists. The comment "Curves in channels significantly slow down water movement" is true in confined channels. Fringing reef systems, like the one surrounding Yap is not a confined channel in a fluid dynamics or hydraulics sense. The entrance channel into Tamil Harbor is a natural deep water channel within the fringing reef system. The change in tidal prism (as a result of the proposed dredging) is used to measure, not speculate, the change in hydraulic characteristics. In the case of a super-elevation of water levels (such as during a typhoon tracking south or east of Yap), the proposed dredging does not change (for the better or worse) the potential damage from storms, due to the in-measurable change in tidal prism. There is no straightening of the natural channel. The proposed dredging at the entrance to the natural deep water channel bend primarily increases the previously widened section that occurred in 1991.

#	Source	Commenter Name	Comment	Response
217	Email Comments	Thomas G. Tun	2. HYDROLOGICAL AND SEDIMENT MODELING 2.2 Critical Modeling Parameters Modeling needs to incorporate: 1. Modeling Parameters: Plume dispersion models must account for bidirectional sediment transport during outgoing tides, considering external currents flowing toward northeast and southeast reefs. Simulations should represent plume movement in both directions from the dredging channel to capture full sediment pathways and inform effective management.	The dredge plume model represent tides, currents, waves and winds, over time. This captures the movement of the tides along with other environmental forcing.
218	Email Comments	Thomas G. Tun	2. Hydrodynamic Data: Collect detailed current velocity and direction data for incoming and outgoing tides, emphasizing the outgoing tide, using in-situ instruments (e.g., ADCPs).	Data was collected using three instruments that were deployed at the port area: Two Nortek ADCPs placed on the seafloor that measure both currents throughout the water column and waves; and one surface buoy to measure waves (Sofar Spotter buoy). Instruments were serviced at 3-month intervals (change batteries, download data, and clean housings and moorings). A vessel mounted ADCP conducted transects across the navigation channel to collect representative current velocities across the tidal regime. The measurement period was 12 months, and used to validate and calibrate the numerical models, which predict conditions outside of the data collection time period.
219	Email Comments	Thomas G. Tun	3. Sediment and Site-Specific Modeling: Incorporate sediment characteristics (grain size, settling velocity, resuspension rates) and conduct separate modeling for the Rull and Tomil dredging areas, as differences in sediment and hydrodynamics affect plume behavior. The finer sediments on the Tamil side may cause more extensive plume dispersion.	The grain size distribution represented in the dredge plume model is determined from measured data of the material to be removed thus represent the site specific in-situ conditions.
220	Email Comments	Thomas G. Tun	4. Time-Resolved and Scenario Simulations: Run time-dependent simulations over multiple tidal cycles and test various dredging schedules, sediment curtain configurations, and environmental conditions to assess impacts on plume dynamics. The model also needs to look at sediment transport over several months to a year to determine where sediment deposits from the dredge plume will move over time.	The hydrodynamic model and dredge plume model is a time-dependent simulation, run over multiple tidal cycles. Various dredging scenarios, silt curtain configurations and environmental conditions will be run. Long-term sediment transport for the Region cannot be represented in the modeling since there are multiple naturally occurring sediment sources that contribute significant quantities of sediment into the receiving waters.
221	Email Comments	Thomas G. Tun	5. Validation: Use field turbidity and sediment concentration data to calibrate and validate models for improved accuracy.	Field data will be measured during construction (turbidity monitors). The hydrodynamic conditions driving the dredge plume model were verified and calibrated using field measured data (currents, water levels and waves).

#	Source	Commenter Name	Comment	Response
222	Email Comments	Thomas G. Tun	6. Storm Event Scenarios: Include scenarios simulating two major storm events per year, such as a typhoon like Sudal followed by multiple tropical storms, to evaluate cumulative impacts on sediment resuspension, turbidity, coastal erosion, and habitat recovery at the port and airport.	Typhoon & Storm Conditions: Historical records of extreme storm events were queried through the Historical Hurricane Track database maintained by the NOAA (NOAA OCM n.d.). All storms passing within a 150-mile radius of the project site were filtered. Since 1947, there have been 127 named tropical storms and typhoons that have passed within a 150-mile radius of the project site. Detailed analysis and modeling was performed for eight identified storms (selected based on measured storm surge, available storm data, and the direction in which the typhoon passed the Project site.)
223	Email Comments	Thomas G. Tun	7. Airport-Specific Considerations: Model rainfall and runoff effects from increased impervious surfaces due to runway expansion, assessing impacts on drainage, sediment transport, and pollutant loading.	The drainage design assumed all surfaces were impervious due to the clay nature of the soil therefore estimating a conservative flow. The design intent is to minimize sediment and pollutants downstream using various erosion control methods which are not used currently at the existing airport.
224	Email Comments	Thomas G. Tun	8. Climate Change Integration: Incorporate United Nations climate projections to account for future changes in storm frequency, intensity, and rainfall, enabling adaptive management strategies that enhance resilience of port and airport infrastructure.	Per current DoW NEPA Implementing Procedures dated June 30, 2025, climate change is no longer considered in US NEPA environmental reviews. However, infrastructure resiliency and the impacts of changing sea levels and storm intensity are still considered; the EIS will continue to evaluate the impacts of the proposed action on relevant environmental resources including marine and water quality, and include Best Management Practices , SOPs, or mitigation measures, if required, to avoid or minimize adverse impacts to applicable resources. Specific to this project, the most recent and site specific data sources and studies were analyzed to determine and account for future changes in storm frequency, intensity, rainfall, sea level change, tectonic and typhoon activity. Data sources include (but not limited to) statistical analysis of the measured tide levels (UHSLC ID 008 at the wharf, data record 1969 to 2015), the El Niño Southern Oscillation (ENSO) Oceanic Niño Index (ONI), Sea Level Rise (SLR) Sixth Assessment Report (IPCC 2021), historical records of extreme storm events Historical Hurricane Track database maintained by the NOAA, Thomas and Burbidge (2009) probabilistic tsunami hazard assessment, NOAA National Centers for Environmental Information (NCEI) Global Historical Tsunami Database encompasses tsunami events from 2000 B.C. to 2024.

#	Source	Commenter Name	Comment	Response
225	Email Comments	Thomas G. Tun	9. Rull and Tomil side for Modeling plume: based off of what size/weight of material being dredged. Tomil side vs Ruul side very different in structure. Modeling takes into consideration that amount of sedimentation is of finer construct. Modeling must take into consideration a much larger area and smaller and larger size material dredged. This is important because the sediment characteristics and hydrodynamic conditions vary, potentially affecting plume behavior. The Kyowa Violet, which struck the reef while turning into the port in 2002, released oil that spread into the surrounding reef flat and mangroves. This incident provides a clear example of how plumes can spread through advection and turbulent mixing, and suggests that fine sediment in plumes from dredging are likely to disperse in a similar manner. In particular, the finer sediments on the Tamil side may result in more extensive and prolonged plume dispersion, highlighting the need for_ site-specific modeling to accurately assess environmental risks. Modeling must also account for the condition of the dredge site at the end of the dredge work. Will lose rock, sand, coral, and sediment be left? Will lose material at the dredge site be captured/secured in place with mesh or other material to prevent the material from entering the water column and be carried to the German Channel or to reefs down current.	The grain size distribution represented in the dredge plume model is determined from measured data of the material to be removed thus represent the site specific in-situ conditions. The characteristics (chemical and physical) of oil are significantly different from sediment. The only commonality between oil spill and sediment dispersion modeling are the driving metocean conditions (wind and hydrodynamics). All modeling conducted was site-specific using calibrated numerical models. The plume model accounts for progressive change as material is removed. Given the characteristics of the material and the characteristics of the reef/channel system (naturally steep sided deep channel), remaining loose material is not expected following completion of the channel improvements.
226	Email Comments	Thomas G. Tun	2. HYDROLOGICAL AND SEDIMENT MODELING 2.3 Data Transparency and Additional Requirements Data for modeling of plume should be shared, including where buoys were deployed for tidal and current speed: Specify the location where the current buoy was deployed and indicate whether current meters were installed at multiple depths. Since water movement varies with depth, capturing velocity profiles at different levels is essential to understand the vertical variation in current patterns. Airport Runoff Modeling needs to incorporate: rainfall data, vegetation data, and high resolution DEMs that should be available from the military LiDAR missions that were flown in Yap. This data provides key parameters needed to predict how much water and sediment will drain from the impacted area. Stream flow and suspended sediment concentrations are also needed to test the accuracy of the model. The model should also account for how the sediment will be dispersed over the sea grass beds and reef areas based on currents and tides.	Data used in the plume modeling was shared via the presentation on Oct 1 'Yap-U.S. Scientific Collaboration'. Current velocities throughout the water column (sea bed to surface) were measured. A review of metocean data collected and numerical modeling conducted for the Yap Harbor has been shared with the Yap State Task Force. The sediment plume dispersion modeling study is ongoing and will be shared with the Yap State Task Force once it is complete. Airport stormwater modeling will be shared with the Yap State Task Force. The modeling was developed based on industry standard methods for completing stormwater analyses.

#	Source	Commenter Name	Comment	Response
227	Email Comments	Thomas G. Tun	3. IMPACT ASSESSMENT AND ZONE DELINEATION 3.1 Socioeconomic Impact Studies Socioeconomic studies to determine MPAs that could be affected: Community member input mentioned several community-protected areas or community-managed areas that are near the mouth of the channel where dredging operations will occur, and where sedimentation may potentially affect habitats. Studies should be done to better understand the history of community management in the area and see how indirect impacts could affect subsistence fishing or harvesting. This information would be critical for determining any mitigation or compensation projects.	The EIS will use information collected through a socioeconomic study conducted in coordination with the Council of Pilung (traditional leaders), the Yap HPO, and the Yap State Task Force. The results of the study will be summarized in the EIS and the full study will be included as an Appendix.
228	Email Comments	Thomas G. Tun	3. IMPACT ASSESSMENT AND ZONE DELINEATION 3.2 Impact Zone Definition Clearly delineated direct impact zones and expected indirect impact zones: Clear zones should be indicated visually on a map of expected direct and indirect impact zones to better help community members understand the potential impacts. Clearly defined negative impact thresholds, that if occur outside of expected direct/indirect impact zones, will trigger additional mitigation in consultation with community (example port everglades page 80): In a previous EIS for Port Everglades, additional mitigation for seagrass habitats was mentioned as a possibility to be determined during the project. Since it is difficult to anticipate the results of any construction activities, additional funds should be budgeted to do additional mitigation if unexpected impacts occur outside of the impact zone, or to continue mitigation efforts if the original mitigation efforts are unsuccessful.	The EIS will establish a region of influence or study area for each environmental resource area documenting the area of potential impacts associated with the Proposed Action. DoW will require monitoring of MILCON impacts during construction and will use adaptive management to the extent practicable to ensure that anticipated impacts are not exceeded. DoW's ability to budget for unexpected mitigation is limited; project contingency funds may be used to address unanticipated impacts if identified during the period that funds are available for obligation (the first 5 fiscal years of MILCON funding availability); if unanticipated impacts are observed after that time, any significant additional funding would likely require a new Congressional authorization.

#	Source	Commenter Name	Comment	Response
229	Email Comments	Thomas G. Tun	3. IMPACT ASSESSMENT AND ZONE DELINEATION 3.3 Baseline Data and Recovery Estimates Larger monitoring of areas to get base line data in case of unexpected plume spread: A past case study of the Port of Miami showed sedimentation 700m from the dredge site, far beyond the 50m where indirect impacts were expected to occur and where monitoring was limited to. Larger reef areas beyond 50m were not monitored, and therefore it was difficult to determine what percentage of habitat was killed or what species may have been lost, which would be critical information for potential restoration activities. Because similar bottom dredge activities will occur in the turn around basin and off the coast of Tomil, this could potentially happen in Yap as well. Larger areas beyond what was included in the original marine resources survey should be monitored with transects, photogrammetry, remote sensing, or other tools to better gather baseline data in case of unexpected impacts. Include all impacted coral and habitat recovery estimates: The overall impacted area from dredging should be assessed beyond just coral removal estimates to include all impacted coral, particularly since the current proposal is that sedimentation curtains will not be used. To improve the accuracy and effectiveness of impact predictions, modeling efforts must be adapted to 'incorporate habitat recovery rates, ensuring that environmental effects are limited to the short term---ideally within 1 to 4 years. This approach will provide a more comprehensive understanding of both immediate and recovery-phase impacts. Additionally, dredging methods should be adjusted based on modeling outcomes to minimize prolonged recovery periods and reduce long-term environmental damage. Integrating adaptive management strategies, including real-time monitoring and responsive sediment curtain adjustments, will further enhance the ability to mitigate sediment plume spread and protect sensitive habitats.	The ongoing sediment plume dispersion modeling study will analyze expected indirect impacts to marine habitats associated with dredging, and will inform the development of minimization/avoidance and mitigation measures. Additionally, monitoring measures including turbidity monitors and potentially other methods will be evaluated and identified in the EIS. The EIS will evaluate both direct (dredging) and indirect (sedimentation, etc.) impacts to corals and other marine resources. Silt curtains are proposed to be used at all dredge locations, except for the entrance channel due to high-wave action and strong currents. Mitigation plans and monitoring strategies will be evaluated based on the best available science and as appropriate.

#	Source	Commenter Name	Comment	Response
230	Email Comments	Thomas G. Tun	3. IMPACT ASSESSMENT AND ZONE DELINEATION 3.4 German Channel Considerations Area of concern approaching German Channel: In the shallow areas leading up to the German Channel, boats must carefully maneuver and wind their way around during low tides to reach the channel's entrance. This area is 1.2 miles closer to the dredging areas before the German Channel opening. Even small amounts of sedimentation making their way to this area would impede fisherman and dive boats from moving through that area on low tide. This concern needs to be examined and the impacts that all dredging and sedimentation plumes will have over the life of the project must be minimized.	The EIS will evaluate potential impacts to German Channel. Preliminary sediment plume modeling results suggest that there will not be an impact to German Channel associated with the proposed dredging. German channel is located over a mile from the nearest dredging activity, and dredging will include best management practices like silt curtains and turbidity monitors to minimize impacts.
231	Email Comments	Thomas G. Tun	4. ENDANGERED AND PROTECTED SPECIES 4.1 Marine Protected Species Species listed under the Endangered Species Act have been recorded in the area : Scalloped Hammerhead sharks (Sphyrna lewini) were sighted as recently as September 10, 2025 at Crescent Reef/ Gabach-opening to the channel. An Olive Ridley Sea Turtle (Lepidochelys olivacea) was also sighted just north ofTomil in June 2025. Crescent Reef/ Gabach Channel has been al:! early morning dive site for scalloped hammerheads for years. Due to adjacent vicinity to dredging, the port project impacts to species needs to be identified. Large sounds and vibrations are known to impact hammerhead species and can affect the presence of these sharks and potential diving options. Acropora globiceps, a ESA threatened coral, is particularly susceptible to threats like ocean warming given that it tends to live in shallow waters of 0 to 8m (NOAA Fisheries). A report noted that A. globiceps was a common coral in Yap (NOAA NMFS), however the baseline surveys only reported Acropora sp. as a group and did not monitor for the presence of this threatened coral. Yap's endangered species must be protected and any impacts from the dredging minimized. Scalloped Hammerhead Sphyrna lewini on February 5 2015 swimming across Baleabaat' reef.	Impacts to protected and culturally important species, including the Scalloped Hammerhead shark (Sphyrna lewini) and Acropora globiceps will be analyzed in the EIS. Underwater noise impacts to scalloped hammerhead sharks will be evaluated, and mitigation plans and monitoring strategies for all protected species will be evaluated based on the best available science and as appropriate.

#	Source	Commenter Name	Comment	Response
232	Email Comments	Thomas G. Tun	4. ENDANGERED AND PROTECTED SPECIES 4.2 Terrestrial Protected Species **Flying fox/maagul'aew *Pteropus pelewensis yapensis: *** Surveys outlined in the Natural Resource Survey Report detailed no exact methods use as outlined in the "Landscape counts for solitary bats"?. Did surveys include ultrasonic bat detectors or was just visual observation used? Surveys should be expanded to include infrared drone visual surveys during dusk and evening hours. This technology will more accurately identify habitats, as well as the known flight times and flight paths of the species. Given that the species is listed as Vulnerable on the IUCN Red List and holds significant cultural importance, enhanced survey methods are critical especially considering the loss of vital·habitat for these species in locations like Guam. It should be noted that community members have identified significantly more flying fox in the Yinuf mangroves than reported in DOD's airport survey.	As described in the survey report, surveys for the Yap flying fox and birds within the environmental survey area were conducted using protocols outlined in the “Landscape counts for solitary bats” in the Joint Region Marianas Mariana Fruit Bat Monitoring Protocol, dated September 2010 (JRM 2010), which was provided as Appendix D to the survey report. The EIS team will continue to coordinate with the Yap State Task Force on available information/data for the Yap flying fox, and the associated impact analysis for the EIS.

#	Source	Commenter Name	Comment	Response
233	Email Comments	Thomas G. Tun	4. ENDANGERED AND PROTECTED SPECIES 4.3 Cryptic Species Assessment Cryptic species other than coral: Dredging activities can have significant impacts on coral reefs, primarily through physical damage, increased sedimentation, and reduced water quality, all of which can stress or kill coral colonies. However, beyond the visible effects on corals, it is equally important to consider the impacts on cryptic invertebrate species---those small, often hidden organisms that inhabit the reef structure. These species, including many filter feeders such as sponges, bivalves, and certain types of tunicates, play critical ecological roles by filtering water, cycling nutrients, and providing habitat complexity. The disturbance caused by dredging can smother these filter feeders with suspended sediments, clog their feeding structures, and reduce the availability of clean water necessary for their survival. Additionally, the physical removal or alteration of substrate can destroy the microhabitats these cryptic species depend on, leading to declines in their populations. Since filter feeders contribute to maintaining water clarity and overall reef health, their loss can have cascading effects on the entire ecosystem, including reduced resilience of coral communities to other stressors. Therefore, dredging impact assessments should extend beyond corals to include detailed evaluations of cryptic invertebrate communities, particularly filter feeders, to fully understand and mitigate the broader ecological consequences of dredging operations.	Sponges were identified as a specific component of the benthic composition in the marine transect surveys. The EIS will analyze potential impacts to marine fauna, including cryptic invertebrate species.

#	Source	Commenter Name	Comment	Response
234	Email Comments	Thomas G. Tun	4. ENDANGERED AND PROTECTED SPECIES 4.4 Orcas (Orcinus orca) and Other Marine Mammals of Concern in Yap and FSM Waters Concern for Orcas, Orcinus orca and other mammals of concern in Yap and FSM waters: as the U.S. Department.of Defense (DoD) expands military exercises and episodic operations in the waters of Yap State and the Federated States of Micronesia (FSM), transient orca populations that periodically migrate into these areas warrant enhanced monitoring and research support. Cyclically Orcas come _into Yap's waters sometimes staying up to six weeks before continuing on to Palau and Guam. Very little is known about their migration. These marine mammals, drawn potentially by prey availability or environmental cues during heightened activity periods, face 'risks from underwater noise, vessel traffic, and other disturbances associated with U.S. naval operations. Providing Yap State with additional resources-such as funding for acoustic monitoring equipment, local training programs, and collaborative research partnerships-would enable proactive data collection on orca movements, behaviors, and potential impacts. This investment not only aligns with DoD commitments to environmental compliance and biodiversity protection under frameworks like the Endangered Species Act but also strengthens bilateral relations with FSM by empowering local stewardship, ensuring sustainable access to training areas, and mitigating long-term ecological risks. Pictures taken of Orcas on September 14, 2009 Southeastern coast of Yap by Daniel Brinckman. Local fisherman stated that the pod stayed off the coast of Yap for approximately six weeks.	The EIS will analyze potential impacts to endangered, protected, and culturally valued species. Potential mitigation measures, such as those listed, will be considered.

#	Source	Commenter Name	Comment	Response
235	Email Comments	Thomas G. Tun	5. NOISE AND VIBRATION IMPACTS 5.1 Marine Noise Concerns Noise and vibration concerns at seaport: Monitoring underwater noise levels during construction is essential to protect marine life and ecosystems from the harmful effects of acoustic disturbance. Continuous, real-time noise monitoring enables the immediate detection of sound levels that may exceed thresholds known to cause behavioral changes, stress, or physical harm to sensitive species such as hammerhead sharks, fish, and filter-feeding invertebrates. Current plans have suggested the use of timber cushion blocks; however, when pile driving is necessary, the use of bubble curtains could be implemented to significantly reduce noise propagation by absorbing and scattering sound waves, thereby minimizing acoustic impacts. By combining real-time monitoring with noise attenuation technologies like bubble curtains, project managers can promptly implement mitigation measures---such as adjusting construction methods, modifying schedules, or temporarily halting activities---to reduce harm. The EIS should also contain more details about the specific soft start protocols. This proactive approach ensures ·compliance with environmental regulations, supports biodiversity conservation, and helps maintain the ecological integrity of marine habitats throughout the construction period.	The EIS team has completed an underwater sound analysis to evaluate sound exposure to the marine environment associated with pile installation. The EIS will summarize this analysis and provide additional detail on BMPs and avoidance/minimization measures, including soft-start measures, to reduce potential impacts to sensitive marine species. For example, pile driving soft-start methods typically require an initial set of strikes with reduced energy to be followed by a waiting periods and then slowly increasing the energy of subsequent strikes. All in-water operations (such as dredging and pile driving) will include experienced observers to monitor for protected species (e.g., turtles, dolphins, etc.) and stop all in-water work if a protected species approaches within the recommended distances. Dredging and pile driving would be paused if protected species enter the shutdown distance, and all work would stop until the animal departs the area voluntarily or a standard amount of time has passed since the last animal sighting.
236	Email Comments	Thomas G. Tun	5. NOISE AND VIBRATION IMPACTS 5.2 Terrestrial Noise and Heat Concerns Noise and Vibration Concerns at Airport: Implement noise reduction strategies, to protect surrounding jungle and homes, particularly the Yap Catholic School. Understand the effects noise and vibration will have on birds and bats. Especially on roosting birds and bat females carrying their babies who tend to drop their young when frightened. Impacts to bats was specifically identified by the community as the Yinuf mangrove just below the current airport is home to one of the largest fruit bat colonies. Heat from airplanes / jets taking off: Implement heat reductions or protection from surrounding vegetations from heat produced from jet take-off and landings.	The EIS team is completing a noise study for the construction and operational activities for the Proposed Action. The study will identify noise sensitive uses by people and animals near the project areas. The EIS will use this noise study to evaluate the potential impacts and include avoidance, minimization, and mitigation measures to reduce or mitigate potential impacts.

#	Source	Commenter Name	Comment	Response
237	Email Comments	Thomas G. Tun	6. DOWNSTREAM ECOSYSTEM MONITORING 6.1 Mangrove Forest Assessment Monitoring of ecosystems downstream of airport. The mangrove forests located downstream of the airport have been identified as some of the most vulnerable mangroves on Yap (Duke et al. 2004; Kauffman and Cole 2010; MacKenzie et al. 2012; Figs. 2 and 3), which has been attributed to altered hydrology and sediment inputs that resulted from the 1990s airport construction, the Kyowa Violet oil spill, and Typhoon Sudall. Any additional negative impacts could result in the loss of these mangroves that community members have identified as key fish spawning grounds and as habitat for one of the largest fruit bat populations. Mangrove forests require certain amounts of water or sediment to maintain tree growth and to keep up with sea level rise. The amount of water and sediment required to support healthy mangroves needs to be determined from baseline data collected from a representative mangrove forest nearby the Yinuf mangrove. This data should then be used to parameterize the hydrological model being used so that the amount of water and sediment that is released to the Yinuff mangroves is the proper amount to maintain growth. Forest plots should also be established in these mangroves as well as in the mangroves directly downstream of the harbor to track any changes in community structure, sedimentation, and growth that could result from the altered·hydrological and sediment inputs that result from the airport extension. Alternatively, remote sensing and NOVI could also be used to track the condition of these mangroves. Figure 2. Map showing mangrove loss between 2000/2003 and 2010 (MacKenzie et al. 2012). Red areas are areas where gaps have formed in the mangroves. Figure 3. 2023 Google Earth Image shows that these mangroves downstream of the airport still have not recovered.	The project has been designed to maintain existing drainage patterns as much as possible. While there would likely be additional stormwater volume from the additional impervious surfaces, the ratio of stormwater reaching the different drainage basins at the airport would be maintained. Additionally, the installation of the detention basins and stormwater management measures would meter out the flow of stormwater over a longer period of time to prevent the heavy pulses of stormwater into the mangrove. The three detention ponds that are nearest the mangroves have a pass-through channel for perennial flows. This replicates the stream flow regime within the pond bottom, which would be similar to what occurs during existing low flow conditions (i.e., without the pond). Major rainfall events will cause storage to occur in the ponds by design, allowing for some sediment to drop out, but that sediment will remain in the overbank area and can be naturally washed downstream via the pass-through channel similar to the way a natural floodplain works. Monitoring of the mangrove forests could be included as a mitigation measure established in the EIS if it is identified as a community priority.

#	Source	Commenter Name	Comment	Response
238	Email Comments	Thomas G. Tun	6. DOWNSTREAM ECOSYSTEM MONITORING 6.2 Infrastructure Maintenance Maintenance of sediment retention' ponds and· other BMPs. Community members have expressed their concern over who will maintain the sediment retention ponds at the airport and for how long. This is because the sediment ponds that were constructed during the 1990 airport construction were not maintained and failed, which resulted in excess water flowing downstream that negatively impacted the mangroves.	The U.S. DoW would work with Yap State and the FSM to develop appropriate operating and maintenance agreements to ensure protection of the U.S. investment in airport improvements. In general, the improvements are designed to be simple to maintain (i.e., no specialized labor or construction equipment). The approval of the defense site agreement would allow the DOW to be eligible for sustainment funding to allow it to contribute toward maintenance of the improvements.
239	Email Comments	Thomas G. Tun	7. MILITARY OPERATIONS AND COMMUNITY IMPACTS 7 .1 Military Security Impacts Military seaport security impingement on non-military traffic. Naval warships in port require increased security. This can include a barrier, picket boats, exclusion zones, or combinations of the three. When the largest US Navy warship comes pier side: 1. How large will the exclusion zone [the minimum distance all vessels must stand off from the moored ship] be?	The United States is required under the SOFA (Article II) to use its best efforts to avoid interference with commercial activities in the FSM. The port is being designed to allow a berth to remain open for commercial activities even with a U.S. vessel in Port. Normal exclusion zones will be adjusted as necessary to minimize impacts to commercial activities and ensure the presence of military vessels do not result in commercial or recreational vessels being precluded from transit around the vessel. Ideally the U.S. will request the implementation of an exclusion zone that will, taking into consideration water space limitations, allow the U.S. vessel the appropriate reaction time to respond to threats.
240	Email Comments	Thomas G. Tun	2. On a daily---and nightly---basis, commercial and recreational waterborne traffic must be free to pass unrestricted outside the exclusion zone "bubble." What steps does the US Navy intend to take to ensure its unfettered travel?	The U.S. Navy would design all exclusion zones to allow commercial and recreational boat traffic sufficient space for safe navigation within the port and harbor. No additional dredging is proposed.
241	Email Comments	Thomas G. Tun	3. There is a protected reef directly across the channel from the port. If the planned exclusion zone will impinge on local commercial and recreational non-military boat traffic, forcing it into the reef area, what actions does the US Navy propose to mitigate the impingement? Will the US Navy propose dredging this reef to allow non-military traffic to clear the exclusion zone?	The U.S. Navy would design all exclusion zones to allow commercial and recreational boat traffic sufficient space for safe navigation within the port and harbor. No additional dredging is proposed.

#	Source	Commenter Name	Comment	Response
242	Email Comments	Thomas G. Tun	4. What navigational aids will be added from outside the reef to/from the port?	The Yap Seaport entrance channel and harbor are currently marked with eighteen fixed ATONs, including 16 single-pile channel markers and 2 three-pile channel markers (at the ocean entrance to the channel). All of the existing fixed ATONs would be replaced with larger, lit fixed ATONs with centered day-boards. The new ATONs would be mounted on submerged concrete foundations, following the current convention in Yap. There are currently no range markers for the Yap entrance channel. Range markers are installed in pairs (front and rear) to assist ship captains in lining up with the center of the navigational channel. The Proposed Action would install a new front and rear range marker along the west side of the Yap Seaport entrance channel. The proposed range markers would consist of a metal-framed tower mounted on a four-pile platform.
243	Email Comments	Thomas G. Tun	5. Is a US Navy radar site going to be added to the port?	No, the Proposed Action does not include a U.S. Navy radar site and there are no plans to install such a site at this time.
244	Email Comments	Thomas G. Tun	6. What provision is the US Navy making for increased pier side shore power, fresh water and fuel; stores onload and offload; and pumping of sanitaries?	The U.S. Navy is not proposing to improve shore side power, fresh water, fuel service, or wastewater service at the wharf. The proposed improvements to the wharf do include the installation of a reinforced concrete pad capable of supporting a 110-ton mobile crane.
245	Email Comments	Thomas G. Tun	7. If explosives are to be handled in port, what provisions is the US Navy making for on-and offloading and security of movement and storage?	The warehouses at the Seaport are anticipated to store construction equipment and materials. There is no anticipated storage of ammunition or ordnance at this time. Therefore, no offloading security measures are anticipated to be needed at this time. If a training evolution were to consider offloading of any ordnance or storage requirements change in the future, the Department of War would coordinate with Department of State and FSM and Yap on any change in need and explain the strict handling procedures the DoW has for such evolutions.
246	Email Comments	Thomas G. Tun	8. How does the US Navy intend to institute landside security of its ships without impacting commercial traffic on and off the pier[s]?	Security measures will be coordinated with Yap State authorities and support will be requested through the logistics request that is submitted prior to the Navy vessel's scheduled visit. The DoW is required to use its best efforts to avoid interference with commercial activities in the FSM and the Seaport is being designed to allow operation of a commercial berth while a military vessel is using another berth.
247	Email Comments	Thomas G. Tun	9. What---if any---railed traffic is the US Navy proposing to install along the piers [example: small gauge rail car or rail cranes]?	The U.S. Navy is not proposing to install railed equipment at the wharf, and none are included in the Port improvement design.

#	Source	Commenter Name	Comment	Response
248	Email Comments	Thomas G. Tun	10. Does the US Navy intend to maintain small boats in the port? If so, where will these be housed, maintained, and secured [in the event of typhoons/heavy weather events]?	No, the U.S. Navy does not intend to house small boats at the port. In fact, the existing and proposed improved mooring systems are not intended for small vessels. Therefore, consistent with current operations, Yap Port is not advised to be used as a 'safe haven' for small vessels during heavy weather.
249	Email Comments	Thomas G. Tun	7. MILITARY OPERATIONS AND COMMUNITY IMPACTS 7.2 Usage Frequency Definition "Episodic use" of seaport and airport. In addition to the 1-2 exercises a year totaling 4 weeks of exercises between the airport and seaport, "episodic use" has been discussed in every meeting. However, the frequency and duration have not been addressed. It is crucial that the frequency and duration of these episodic events be defined and included in the models when determining the environmental, cultural, and socioeconomic impact to Yap, including the impact on nearby schools (Yap Catholic High School, Yap High School, Yap Middle School, and COM) and communities. This should include an average use model and a MAXIMUM possible use as well.	Episodic use describes military actions that are already taking place independent of the seaport and airport projects; for example, the occasional landing of a C-17 to provide supplies for the Seabees has happened and may happen again and likewise supplies may arrive by ship or port calls may be arranged in coordination with the FSM and Yap State. Because these kinds of activities are not new and are unpredictable, it would not be analyzed in the current EIS.

#	Source	Commenter Name	Comment	Response
250	Email Comments	Thomas G. Tun	8. SURVEY METHODOLOGY DEFICIENCIES 8.1 Survey Completeness Issues Natural Resource Survey Report: Report is incomplete due to several gaps listed in section four. Vegetation surveys could not be completed in several areas and the presence of special status plant species could not be confirmed, only their potential to be there could be reported. The missing information is needed to determine if there are endangered or near-threatened species present. The report is also missing information on what model was used to predict surface runoff as well as an appendix and when referencing methods from particular established protocols, reports should clarify what type of methods were adopted or used specifically. Expand Survey efforts to night for both land and ocean: It is unclear from the Natural Resources Survey Report if any survey took place during nighttime. Because many cryptic species are nocturnal, survey effort should include nighttime. Nocturnal surveys should additionally be incorporated' for marine species for the port dredging areas that will be impacted directly and indirectly.	We understand you concerns regarding the completeness of the survey efforts. The U.S. team is confident that the areas safe to survey were, in fact, surveyed in an appropriate manner to gather the information needed to complete a baseline description of the affected environment and evaluate the potential impacts of the proposed projects. With the exception of encountering suspected burial sites or ERW (which were avoided out of respect and safety), there was only one area of approximately 14 acres that was not surveyed due to heavy equipment actively clearing trees and vegetation. It was unsafe for field personnel to be in the area to conduct surveys. The natural resources surveys were conducted to check for special status species; studies to evaluate surface runoff were conducted separately by the design team. The final reports will be provided to the YUMO Task Force when available. The transect and windshield survey methods are provided in Chapter 3, and the methodology for bat surveys taken from the JRM bat monitoring protocol is briefly described in Section 3.3.3 and provided in full as Appendix D. The terrestrial survey terrain was uneven with numerous cavities, depressions, and deep holes hidden by tall grass and savannah ferns, as well as large areas that had been cleared and the vegetation left in place, sometimes in piles upwards of 15 or 20 feet. It was not safe to conduct nocturnal jungle surveys. Both dusk and dawn bat and bird surveys were conducted.
251	Email Comments	Thomas G. Tun	8. SURVEY METHODOLOGY DEFICIENCIES 8.2 Survey Method Concerns Use of iNaturalist for environmental resource survey background. For the airport natural resources survey, iNaturalist was referenced to provide a list of species on the island accessing lists of reptiles, amphibians, insects, and.mammals. While a great recreational app, this is not widely enough used on island or accurate enough to be used for surveys for an EIS and has often resulted in misidentification of species. Thorough scientific surveys of species must be conducted to properly identify and count species. Relying on an observational, recreational app is insufficient.	The natural resources survey team was not permitted to meet or correspond with the Yap Government prior to surveys or during report development to obtain concurrence on the species list or obtain more recent information on species that had been documented on the island. The majority of the open-source scientific literature was either old or not Yap specific; therefore, iNaturalist was used to supplement missing information. The U.S. is open and willing to accept any updates to species identification for accurate description of the environment in the EIS.

#	Source	Commenter Name	Comment	Response
252	Email Comments	Thomas G. Tun	9.REFERENCES AND SUPPORTING DOCUMENTATION Literature and resources to be included and considered. This is by no means an exhaustive. list and requires further investigation and identification of studies, but is a start. Below are some of the selected studies that should be examined. Additionally, resources should be pulled from the University of Guam technical report website, Micronesian Seminar, and COMFSM Library. Please note, the majority of these papers were located by simply searching '"Yap, FSM" in Google Scholar. See references in attached letter.	Thank you for providing these references.
253	Email Comments	Marjorie C. Falanruw	Thank you for the opportunity to comment on the DOD Project. These comments are based on your presentation at the second scoping meeting with the Rull Community on 11 September, 2025. My comments do not cover all environmental and social issues – as many will be more thoroughly addressed by others. These comments are supplementary to those I submitted within the deadline for comments following the first scoping meeting with Rull. A copy of those comments is attached as I have not received an official notification that you have received them. Please acknowledge receipt of both sets of comments.	Thank you for providing your comments. Both sets have been received and will be incorporated into the development of the EIS.
254	Email Comments	Marjorie C. Falanruw	I remain concerned about the adequacy of the “detention basins” intended to manage runoff that could seriously damage aquifer, marsh, taro patch, mangroves, sea grass meadows, and coral reef systems downslope. We were told, repeatedly, that the DOD project will be an improvement over the present lack of managed runoff – but the reason that runoff is not now managed is because the construction of the current airstrip, overseen by the Navy OICC, resulted in the death of mangroves above the current road, and the settling basins installed by the Navy OICC during the construction of the current airstrip failed, resulting in a flood of silt laden water into taro patches, mangrove and reef communities resulting in much damage. We are thus concerned about the adequacy of the proposed “detention basins”.	We understand your concern. The EIS will include more detailed information regarding the detention basins and the overall stormwater management system for the airport. Additionally, the project team is coordinating with the Yap State scientists to gather existing data on the mangroves and conduct an additional study that will support the analysis in the EIS.

#	Source	Commenter Name	Comment	Response
255	Email Comments	Marjorie C. Falanruw	If the detention basins are not maintained, they will not function. At both the first and second scoping meetings we were told that arrangements for maintaining them have not yet been made. Construction should not begin until arrangements are made for adequately managing runoff, maintaining the detention basins, and the development of a monitoring program that defines limits of acceptable change and response actions. This is critical for maintaining the aquifer, taro patches, and mangrove and reef systems essential to the food security, welfare and cultural identity of Yap's community.	If the areas are included in the defense site agreement, they would become eligible for earning sustainment funds which could be used to contribute toward maintenance. The U.S. DoW would work with Yap State and the FSM to develop appropriate operating and maintenance agreements to ensure protection of the U.S. investment in airport improvements. In general, the improvements are designed to be simple to maintain (i.e., no specialized labor or construction equipment). Specific skills or tools will not be required to maintain the basins.
256	Email Comments	Marjorie C. Falanruw	At the second meeting we were told that the DOD cannot commit to maintaining the detention ponds or to commit to other expenditures such as compensation of land owners until the site is declared a "defense site" and more money is released. What are the implications of the declaration of the DOD project as a "defense site"?	Designation as a defense site provides the DoW with the operational control needed to allow expenditure of MILCON funds. Entry of a Defense Site on DoW property records allows DoW to earn sustainment funds which can be used to contribute toward site operation and maintenance costs. In order for Yap State to make lands available for a defense site, they must obtain appropriate property rights from current private landowners; the DoW is prepared to provide financial assistance for the acquisition of such property rights. The Roman Tmetuchl International Airport (ROR) on Palau is an example of a Joint Use Defense Site.
257	Email Comments	Marjorie C. Falanruw	At the first meeting we were told that fuel will not be stored on site – perhaps only some fuel bladders. At the second meeting we learned that plumbing will be installed so that fuel can be pumped to future storage tanks. Av gas is especially toxic to mangroves and heavy metals and toxic materials that it contains can remain in the ecosystem and be amplified through the food chain that affects people. Fuel spills are difficult to manage, as we have seen from the repeated spillage at the former Coast Guard LORAN station on Yap where they affected taro patches and mangrove systems and could be detected in mud for years after the spills. Construction of fuel storage tanks should not begin until adequate measures for containing spills are in place and there is a monitoring program that defines response actions. This is critical for maintaining the aquifer, taro patches, and mangroves and reef systems that are essential to Yapese food security, culture, identity and welfare.	We greatly appreciate your suggestions. The airport fuel system is currently being developed and may require additional modifications. The EIS will assess current plans for fuel storage and system operations, identify possible avoidance/minimization measures (e.g., secondary containment, spill prevention plan, etc.), and analyze impacts.
258	Email Comments	Marjorie C. Falanruw	The EIS should disclose any chemicals that will be used for soil stabilization, and for vegetation management and how they will be managed. There must be a plan for managing spillage with defined limits and responses – as such chemicals can have severe impacts on the natural habitats downstream.	The contract specifications will require the contractor to obtain approval from the Yap State EPA to use any chemicals for pesticides, vegetation management, soil stabilization, etc. They will generally need to provide the Yap State EPA a list of chemicals intended to use, storage requirements, quantities to be used, safety data, and other manufacturer specifications.

#	Source	Commenter Name	Comment	Response
259	Email Comments	Marjorie C. Falanruw	Vegetation management: The impact of any herbicides, pesticides and fertilizers used in managing vegetation on downstream wetland systems must be considered and mitigated, and an enhanced program to monitor and combat invasive species about the enlarged sea and air ports is needed. The infamous Imperata grass, one of the world's worst invasive grasses, was introduced near airstrips on Yap, Palau and the CNMI. It took Yap about 20 years to eradicate this threat - that could resurface in the increased open area of the airstrip. Prevention is more effective, and cheaper.	Vegetation management practices for the improved airport would be similar to the current practices at the airport, but the expansion will require management of a larger footprint. The EIS team will coordinate with airport managers to understand and describe vegetation management practices and assess potential downstream impacts. The contract specifications will require the contractor to obtain approval from the Yap State EPA to use any chemicals for pesticides, vegetation management, soil stabilization, etc. They will generally need to provide the Yap State EPA a list of chemicals intended to use, storage requirements, quantities to be used, safety data, and other manufacturer specifications. The DoW is coordinating with the FSM Government and the Yap State Government on the necessary biosecurity protocols to prevent the introduction and spread of invasive species as a result of the proposed project. The construction contract will include explicit requirements to prevent the introduction and spread of invasive species and will only be authorized to use FSM- and Yap-approved herbicides and pesticides. The specification would also explicitly require inspection of materials at their source destination prior to shipment to Yap. These provisions are enforceable and make it clear that inspection at the source is not optional. Details on the biosecurity protocols would be specified in the contract and discussed as part of the EIS analysis. Additionally, the construction contractor would be responsible for developing and implementing a plan to address biosecurity.
260	Email Comments	Marjorie C. Falanruw	Vegetation removed from the airport area could be used as mulch and to convert into biodiverse compost for use in gardening and restoration of degraded savanna soils. Cooperative work is needed to develop an effective program to do this.	Thank you for sharing this recommendation. The project team understands this is a great opportunity to utilize cleared vegetation as mulch for local communities and is coordinating with the YUMO Task Force and local stakeholders (e.g., Department of Agriculture and Forestry) to develop an effective mulching program.
261	Email Comments	Marjorie C. Falanruw	Expansion of area to be assessed and monitored: As expressed earlier, it is important to include the impact of the DOD project on groundwater and downstream systems including the aquifer, marshes, taro patches, mangroves, sea grass meadows and coral reef systems, as well as keystone species such as fruit bats that roost in the mangroves below the airport and spread seeds of fruit, timber and other trees throughout Yap. It is important to maintain the resources, ecosystem services, and connectivity of these systems. An example of this is illustrated by the especially high density of ancient stone fish weirs south of the mangroves that serve as fish nurseries. Runoff from the DOD airport expansion will impact these mangroves – and fisheries.	The U.S. agrees it is important to maintain the resources, ecosystem services, and connectivity of these systems and is committed to promoting efforts to avoid minimize and mitigate potential impacts resulting from the proposed project .The EIS will evaluate reasonably foreseeable direct and indirect effects of the Proposed Action. This would include potential impacts on downstream ecosystems like the mangroves below the airport.

#	Source	Commenter Name	Comment	Response
262	Email Comments	Marjorie C. Falanruw	Figure 1. Vegetation about airport (yellow). Mangrove is blue. Figure 2. Concentration of ancient arrow-shaped stone fish weirs south of mangrove fish nursery. Map shows old airport. New airport is parallel and uphill, and drains into large mangrove above that shown on this map. The map indicates that the mangrove serves as a nursery for fish caught downstream. From Falanruw, Lubuw, ca 1975. Yapese stone fish weirs, based on aerial surveys and ground truthing.	Thank you for providing this information, it will be incorporated into the EIS analysis.