

NMI consultant says draft EIS 'lacks science-based analysis'

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THE CNMI Joint Military Training draft environmental impact statement lacks science-based analysis, according to the CNMI government's federal funded consultant, Environmental Science Associates or ESA.

After reviewing the CJMT draft EIS, ESA submitted its report on Sept. 30, stating that the military document failed to acknowledge the special context of island ecology.

It said the draft lacks baseline data, lacks clear significance thresholds, has substandard analysis of potential effects, has inadequacies on mitigation, and failed to comply with the intent of federal laws and regulations, among other things.

ESA said the draft used the acres of habitat loss as a measure of effects to habitat and wildlife.

"While loss of 100 acres of habitat would have relatively minor effects to common wildlife on the mainland U.S. — loss of the same area of habitat on a small island that supports endemic and rare species has vastly different consequences.

ESA said Pagan and Tinian are home to endemic, rare and endangered species vulnerable to disturbances.

"The small populations of rare species on oceanic islands, restricted ranges and limited diversity of defenses make island biota particularly vulnerable to extinction through habitat loss or introduction of invasive species."

ESA said there was no thorough risk analysis for this outcome.

There were also no details provided as to the military's biosecurity plan it will develop, which renders it difficult to evaluate such a program's adequacy.

ESA also said the islands support some of the highest proportions of endangered species per unit land area.

Island populations, ESA added, are more prone to extinction than mainland populations.

"The EIS includes no science-based assessment of how the proposed training will affect the current small populations of rare birds and bats."

Neither was there an analysis of habitat loss, threat of invasive species, noise and human disturbance and other factors that are severe threats to species on a small oceanic island.

"The discussion in the EIS of the effects of the Navy proposal to island biodiversity is deficient, lacks any scientific credence and was developed as if the project were located at a generic mainland U.S. location and not on a very unique and vulnerable South Pacific island landscape."

ESA said the discussion of the range of effects to wildlife on Tinian and Pagan needs to be completely revised and should be developed based on a sound scientific foundation of island landscape ecology principals and using an analysis framework applicable to the South Pacific.

As for the lack of baseline data, ESA said the EIS should demonstrate a sufficient effort in using existing reports, using local knowledge and expertise obtained by coordinating with agency resource professionals, and conducting field data collection that corresponds to the level of potential effects to resources.

ESA said it appears that the military banked on readily available reports "leaving out a number of other reports and data sources

held by resource agencies.”

ESA said there was insufficient effort to collect baseline data: out-of-date aerial photographs of Tinian and Pagan were used; there were extremely limited wildlife and plan surveys; there was no data collection made on existing soil and groundwater contamination on Tinian from WWII; there is a lack of baseline data for seabirds to be affected by the proposed action; there was no mention of endemic arthropod species on Pagan and other new species recently discovered; no attempt to assess baseline condition of marine mammals; and no baseline data for the endangered Mariana fruit bat.

“Each resource area needs to be fully evaluated, the Navy should coordinate with local agencies regarding data needs and local expertise, and additional baseline data needs to be collected for most resource areas to comply with NEPA and standard analysis practices.”

ESA said in the draft EIS, most resource area analysis includes vague sets of significance thresholds that provide no standardization of analysis and do not support the EIS conclusions.

Moreover, ESA said there is a lack of meaningful analysis of potential effects for all resource areas.

Citing the EIS claim that the CJMT would not have significant effects on the Micronesian megapode, ESA said just because the species is rare should not be a reason for determining the level of effects.

“Rather, standard environmental practices would consider this species’ productivity and long-term survival more susceptible to the effects of noise and human disturbance because its population numbers are so low and therefore at risk.”

Further, ESA said the EIS lacks impact avoidance analysis, and has erroneous conclusions that mitigation is not necessary or required. ESA said the EIS also reduced effects to less than significant with no specific mitigation offered, and has ambiguous and noncommittal mitigation proposals.

ESA said the military consistently downplays the need for mitigation and repeatedly comes to the conclusion that effects are less than significant with no factual basis or documented decision process provided.

As to compliance with federal laws and regulations, ESA found the CJMT EIS is silent on compliance with the Endangered Species Act, the Marine Mammal Protection Act, the Safe Drinking Water Act, and the Clean Water Act.

ESA and Dentons US LLC were hired in June by the Inos administration to provide consulting services in connection with the CNMI Joint Military Training Draft Environmental Impact Statement.



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