



Lourdes A. Leon Guerrero
Governor

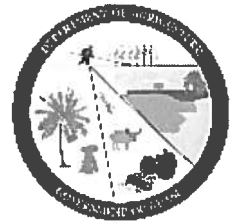
Joshua F. Tenorio
Lt. Governor

Department of Agriculture Dipattamenton Agrikottura

163 Dairy Road, Mangilao, Guam 96913

Director's Office
Agricultural Dev. Services
Animal Health
Aquatic & Wildlife Resources
Forestry & Soil Resources
Plant Nursery
Plant Inspection Facility

300-7966/64; Fax 734-6569
300-7973/300-7967
300-7965
735-0294/0281; Fax 734-3154
300-7976; Fax 300-3201
300-7974
475-1426/27; Fax 477-9487



Chelsa Muna-Brecht
Director

April 17, 2019

Ms. Nora Macariola-See
Naval Facilities Engineering Command Pacific
258 Makalapa Drive, Suite 100
Pearl Harbor, Hawaii 96860-3134.
Attm: MITT Supplemental Draft EIS/OEIS, Project Manager

Email: Marianas.tap.eis@navy.mil

Subject: Comments on the Supplemental Draft Environmental Impact Statement/Overseas Environmental Impact Statement for the Mariana Islands Training and Testing Activities

Hafa Adai:

As the local state agency mandated to monitor and protect Guam's biological resources, the Guam Department of Agriculture (DoAg) submits the following general comments to be addressed in the Final MITT Environmental Impact Statement and Record of Decision. In addition, attached to this letter, are specific comments from the MITT DEIS/OEIS in a comment matrix format.

1. First and foremost, Department of Navy (DoN) needs to provide a progressive, comprehensive plan for the recovery of native species on Military property in consultation and coordination with DoAg. Without the ability to reintroduce federally endangered species on DOD property the cumulative impacts of DOD actions are jeopardizing the DoAg's ability to recover Guam's native species on Refuge Overlay lands. Furthermore, DOD's failure to coordinate with DoAg as required by the Sikes Act of 1960 [16 U.S.C. *et seq.*; 74 stat. 1052], as amended, and recognize the DoAg's ability to assist DOD in meeting their Section 7 requirements under the Endangered Species Act of 1973 [16 U.S.C. 1531 *et seq.*; 87 Stat. 884], as amended, results in a waste of taxpayers' dollars. The DoAg further emphasizes the need to be consulted and notified in matters that may impact the natural resources of Guam.
2. Secondly, the Final EIS needs to outline how DON will address long-

standing issues regarding timely access for the DoAg Division of Aquatic and Wildlife Resources (DAWR) staff to all DOD lands to monitor and manage Guam's natural resources. The DoAg-DAWR staff could complete monitoring of resources under annual federal funded grant objectives, without cost, or at a much lower cost to DoN that is currently being contracted and assist with meeting Sikes Act coordination obligations. The current access requirements for DoAg-DAWR staff are cumbersome and prevent timely coordination as opposed to those procedures for federal employees and contractors.

3. The Final MITT DEIS needs to address another long-standing issue that is DOD's failure to comply with local laws. The MITT activities and study area include the Piti Marine Preserve Area that extends to the 600-foot contour. Any take of non-pelagic fishes within this area is a violation of Guam law.
4. The Final MITT DEIS must mitigate the cumulative impacts to recreational fishing in the oceanic areas that will be impacted by the proposed action. Recreational fishing includes sustenance and small-scale commercial fishing. The NEPA documents for other proposed military activities indicate the closure of important fishing areas such as Ritidian and Pati Point. The additional loss of key recreational fishing areas proposed in the Draft MITT EIA is unacceptable and irreplaceable.
5. Other boaters, including divers and other recreational users, also frequent many areas within the MITT study area. There is no clear indication of how extensive closures will be – do events last for an hour, or a day, or a week? The Final EIS and ROD need to minimize closure of areas regularly used by recreational boaters and fishers and identify clearly the space and time of the closures.
6. When notices to mariners is sent out, DOD should insure that notices are sent out to all media source outlets, to inform the public of Surface-Danger –Zone activities as the actions are implemented.
7. Prior to training exercises, the DoN and USCG issue NOTMARs and NOTAMs to announce an exercise and to notify the public of potential hazards in the exercise area. DoN must ensure these notices are adequately distributed to the public and with a much larger area proposed in the MITT distribution must be assessed for adequacy.
8. The ROD must clearly indicate how the Micronesia Biosecurity Plan will be implemented, including funding mechanisms, to prevent the spread of invasive alien species (IAS) throughout the region. For example, 100% inspection rates for brown tree-snake (BTS) at ports of exit from Guam and entry points to other regional areas are necessary to ensure BTS does not impact bird, bat and lizard populations on other islands. These populations are necessary for the recovery of Guam's native ecosystem.

9. Although there are currently BTS inspections of cargo and vessels from Guam, there is a potential for the system to be overwhelmed by the increase in tempo of activities. The MITT DEIS also needs to be mindful of other IAS that Guam could infect CNMI with that would be devastating to endangered wildlife and its habitats, i.e., little fire ant and coconut rhinoceros beetle.
10. Consistent monitoring of behavior and distribution of Mariana fruit bat/island swiftlet/common moorhen/megapode (and other terrestrial species of regional concern) must be conducted prior to and after MITT related activities in-order-to evaluate the impact of activities, particularly on species of greatest conservation need. Appropriate measures must be incorporated to reduce impacts to terrestrial species, as well as measures to avoid impacting species that aggregate when feeding in open water ocean. Impacts to aggregations of individuals in the expanded areas of MITT activities may impact species on a population level.
11. The assessment of potential effects to marine animals and habitat from underwater detonations needs more clarification and analysis. Habitat mapping needs to be more detailed, the Cetacean species that utilize the area proposed for the MITT need to be identified, as well as the impacts such activity will have on these species. The analysis also needs to include the impacts to sea turtles. The presence of ESA-listed sperm whales is well documented within three to five miles offshore in the Agat area. Effects to this species and the mitigation for these actions are not addressed in the MITT DEIS. The increased boat activity greatly increases the potential for boat strike of sperm whales. Navy lookouts undergo extensive training in order to qualify as a watch stander. It seems the use of these watch standers been how successful & should be measured.
10. DoAg is concerned about the impact of landing craft exercises on the dolphins that reside in Agat Bay. The DoN contended unavoidable impacts. The Navy recognizes the common occurrence of spinner dolphins within Agat Bay and has developed mitigation measures in consultation with NMFS under provisions of the MMPA. Beachmasters are shore-based observers with binoculars whose sole purpose is to ensure safety of craft including avoidance of marine and terrestrial animals. Beachmasters were to work with environmental monitors and the natural resource managers. These measures have been utilized - how successful have they been and how has that success been measured?
11. The MITT DEIS must address impacts to the existing community of resource users and the need to mitigate economic impacts by avoiding near shore populations and their habitats. The training activities themselves present additional challenges that may alter the landscape far beyond the closure period. The potential loss of marine life, whether through injury, mortality or simply scaring them out of the area, presents significant economic issues for tour operators who rely on a healthy population of marine animals for their tours. The underwater detonations, for example, could lead to the relocation of Agat Bay's resident dolphin pod, disrupting

the dolphin-watch boats and other tours. The Navy recognizes the common occurrence of spinner dolphins within Agat Bay and has developed mitigation measures in consultation with NMFS under provisions of the MMPA, however more effort needs to be made to minimize impacts through avoidance and relocation of activities to areas of less impact.

12. It is probable that sea turtles would be affected by landing-craft training activities. The Navy agreed that landing craft training activities could potentially affect sea turtles within the MIRC. The Navy consulted with NMFS and USFWS Pacific Islands Field Office under provisions of Section 7 of the ESA to avoid, minimize and offset potential impacts associated with MIRC training on sea turtle nesting activity and activity in near shore and open ocean marine environments. How have these activities impacted sea turtles? What measures would be used to protect sea turtles in MITT. The use of LCACs and other equipment on sandy beaches can negatively impact sea turtle nesting and hatching success. Consultation with the local resource agency in addition to the Navy surveys can help avoid possible interactions.
13. The Final MITT DEIS must clarify impacts and identify necessary mitigation for fish mortality associated with soft bottom detonation operations in Apra Harbor. How have these activities in the MIRC impacted soft bottom habitat for species of ecological as well as fishery resource importance? Fish mortality associated with training activities within the MIRC are discussed in EIS, Section 3.9 (Fish and Essential Fish Habitat) but no mitigation is proposed to address this issue.
14. DoAg requests more effort made to either find alternatives that will cause fewer impacts, or to provide environmental and compensatory mitigation to offset impacts to the open ocean and near shore marine environments and the species that inhabit them. The Final MITT DEIS should include (similar to the MIRC) a Range Monitoring Plan, reporting requirements, adaptive management, etc. Components of the monitoring and mitigation plans should be in cooperation with NMFS, USFWS and DoAg-DAWR. Monitoring and mitigation will be used both as: 1) a planning tool to focus Navy monitoring priorities (pursuant to ESA/MMPA requirements) across Navy Range Complexes and Exercises; and 2) an adaptive management tool, through the consolidation and analysis of the Navy's monitoring and watch stander (lookout) data, as well as new information from other Navy programs (e.g., research and development), and newly published non-Navy information.

Thank you for the opportunity and consideration of DoAg's comments on the Draft EIS. We look forward to reviewing a more complete analysis of impacts in the final EIS that clearly identifies and addresses the potential impacts associated with the MITT activities and includes viable options for avoidance and mitigation.

Sincerely



JOHN C. BORJA
Acting

Attachment(s):

cc: USFWS, Ecological Services
Bureau of Statistics and Plans,
GCMP Guam Environmental
Protection Agency

No.	Vol.	Page	Section	Subject	Statement	Comment	Commenter
1	1	ES-22	ES 6.1	Cumulative Impacts	Alternative 1 or Alternative 2 would contribute to cumulative impacts; however, marine mammal and sea turtle mortality and injury from non-Navy actions associated with commercial fisheries, commercial vessel strikes, and entanglement in marine debris are leading causes of direct mortality to marine mammals and sea turtles.	There are many dangers for the survival for marine mammals and sea turtles. Because of the negligence and disregard to marine habitats, sea life continues to be in danger. The EIS should focus on how to minimize the impacts from the proposed activities rather be contempt that the activities proposed should be fine because others are already causing impacts to sea turtles and other sea life.	DoAg-DAWR
2		ES-23	ES 7.3	Cumulative measures considered but eliminated	A number of possible additional mitigation measures have been suggested during the public scoping period of this SEIS/OEIS and comment periods of previous Navy environmental documents. Through the evaluation process,	During the scheduled Public Scoping meetings, the DoN and their contractor preparing the MITT EIS fails to provide guidance to those in attendance on process of submitting a measurable, nor do they provide the evaluation process for	DoAg-DAWR

No.	Vol.	Page	Section	Subject	Statement	Comment	Commenter
3		ES-23	ES 7.4	Monitoring	<p>some measures were deemed to either be ineffective, have an unacceptable impact on the proposed training and testing activities, or both, and will not be carried forward for further consideration</p> <p>The Navy is committed to demonstrating environmental stewardship while executing its national security mission, complying with the suite of federal environmental laws and regulations, and providing required and relevant reports to appropriate regulatory agencies.</p>	<p>comments being submitted.</p> <p>DoN fails to recognize local environmental laws (many that are reflective to federal laws but site specific for the territory). DoN submits reports to NMFS, but fails to identify local agencies (GEPA, GDAWR, GCZMP).</p>	DoAg-DAWR
4		ES-24	ES 7.6.1	Consistency with Other Federal, State, and Local Plans, Policies and Regulations	<p>Based on an evaluation of consistency with statutory obligations, the Navy and other Service's proposed training and testing activities would not conflict with the objectives or requirements of federal, state, regional, or local plans, policies, or legal requirements. The Navy and other Services are consulting and will continue to consult with regulatory agencies</p>	<p>GDAWR has been involved in the process at the Public Meeting held at Univ. of Guam. There has not been any other roundtable discussions or dialogue between DoN and GDAWR about marine protected species and critical habitats, that occurs within the scope of the proposed activity site. FEIS should be more specific and honest when describing consistency with</p>	DoAg-DAWR

No.	Vol.	Page	Section	Subject	Statement	Comment	Commenter
5	1	1.1-1.2	1.1	Introduction	<p>as appropriate during the NEPA process and prior to implementation of the Proposed Action to ensure all legal requirements are met.</p> <p>The Navy will consult with National Marine Fisheries Services to renew authorizations.</p>	<p>statutory obligations.</p> <p>As stated in the Exec. Summary, the Navy will continue to consult with regulatory agencies. NMFS has been identified, but no inclusions with local regulatory agency.</p>	DoAg-DAWR
6					<p>Department of Defense realignment/reassignment efforts in the Western Pacific have previously been, or are currently, the subject of various environmental planning processes, including the EIS and Supplemental EIS, which studied the realignment of Marine Corps forces to Guam, ongoing EIS efforts to address joint training and land-based training requirements in the CNMI, and EIS efforts to discuss Air Force divert landing and training requirements in the CNMI. The training and testing</p>	<p>Several EIS and Supplemental EIS are mentioned in this Draft MITT EIS/OEIS. Yet, there is no acknowledgement in the document with the TOTAL IMPACT to the environment from the various activities mentioned. Guam and CNMI both are limited with natural resources. The continuous stress on these resources with military activities on-going in the islands will need to be monitored and mitigated.</p>	DoAg-DAWR

No.	Vol.	Page	Section	Subject	Statement	Comment	Commenter
7		1-3	1.2	The Navy's Environmental Compliance and At-sea Policy	<p>activities covered by the 2015 MITT Final EIS/OEIS, as well as in this supplement, are separate and distinct and have independent utility from the actions proposed by Marine Corps forces and those of the U.S. Air Force within the CNMI.</p> <p>The Navy and NOAA reached on an agreement on a coordinated programmatic strategy for assessing certain environmental effects of military readiness activities at sea.</p>	<p>Agreements usually require technical reports. Have any reports been submitted to NOAA? Have these reports been shared with local regulatory agencies?</p>	DoAg-DAWR
8		2-1	2.3.2.2.3		<p>The Navy's entire suite of mitigation measures... to ensure that the benefit of mitigation measures to environmental and cultural resources was considered during the environmental analyzes.</p>	<p>Draft MITT EIS/OEIS has mentioned mitigation measures for environmental and cultural resources. Yet, there is no mentioning thus far who they (the Navy) is consulting with regarding cultural resources in the document. Only NMFS has been identified as a consulting agency to the resources.</p>	DoAg-DAWR
9		2-26 to 2-43	Table 2.5-1 & 2.5-2	Current and Proposed Training Activities	<p>Table 2.5-1 and Table 2.5-2 summaries a comparison of Alternative 1 and Alternative2</p>	<p>In relation to environmental and cultural resources, what are the outcomes of the on-going 2015</p>	DoAg-DAWR

No.	Vol.	Page	Section	Subject	Statement	Comment	Commenter
					with the 2015 MITT EIS/OEIS On-going activities.	MITT EIS/OEIS activities? And, Is there a report available for the local agencies and general public to read?	
10	1	3-1	3.0.1	Overall approach to analysis	Determine if the affected environment has changed.	Has this been done? If so, what is the result of the study?	DoAg-DAWR
11	1	3-1	3.0.1	Overall approach to analysis	Identify new activities and proposed changes to existing activities.	What changes in the activity was made from 2015 MITT to current proposal?	DoAg-DAWR
12	1	3-1	3.0.1	Overall approach to analysis	Review and apply new literature, including science, surveys, and information on how resources could be affected by stressors.	What studies have occurred during (or since) 2015 MITT to help identify new methods to analyze resources affected by stressors?	DoAg-DAWR
13	1	3-2	3.0.1.1.1	Marine species monitoring and research program		DoAg-DAWR has been monitoring marine mammals and sea turtles for several decades, this includes stranding events. No efforts were made by DoN to consult and/or collaborate with the state agency.	DoAg-DAWR
14	1	3.3-5	3.3.2.2.1	Impacts from Physical Disturbance and Strike Disturbance Under Alternative 1	Military expended materials are very small relative to marine habitat and would not change the quality or type of habitat present. Therefore, these increases are not expected to pose a risk to marine habitats.	What test/study is being conducted to determine if this statement is true? Is the quantity of training exercises factored in for this statement?	DoAg-DAWR

No.	Vol.	Page	Section	Subject	Statement	Comment	Commenter
15	1	3.4-11	3.4.1.7.6	Hunting		Irrelevant topic in this area. Whaling (whale hunting) occurs in other areas outside of the MITT area.	DoAg-DAWR
16	1	3.4-4	3.4.1.7.10	Marine Debris	(refer to entire paragraph about Marine Debris).	There's no true saying where marine debris originates. Most marine debris (bottles, fishing gear, etc.) found near Guam's waters are written in a foreign language. Regardless, the debris left behind from the MITT exercises will need to be removed from MITT area.	DoAg-DAWR
17	1		3.4.1.7	General threats	Water Quality, Commercial Industries, Bycatch, Other Fisheries Interactions, Noise, Hunting, Vessel Strike, Disease and Parasites, Climate Change, and Marine Debris were discussed.	Commercial industries, bycatch, other fisheries interactions, and hunting are irrelevant topics of discussions. None of these general threats occur on Mariana Islands waters. It is important that Navy's contractor engages collaboration with local resource agencies.	DoAg-DAWR
18	1	3.4-78	3.4.2.1.1.5	Behavioral Reactions		Studies used for Behavioral Reactions to Vessels are from colder temperature waters compared to ocean water temperatures found in the MITT area. Sound in colder	DoAg-DAWR

No.	Vol.	Page	Section	Subject	Statement	Comment	Commenter
19	1	3.5-11	3.5.2	Environmental Consequences	In their biological opinion, NMFS determined that within the Study Area, only acoustic stressors and explosive stressors could potentially result in adverse effects on ESA-listed sea turtles from training and testing activities and that none of the other stressors would result in significant adverse impacts or jeopardize the continued existence of any ESA-listed sea turtle (National Oceanic and Atmospheric Administration, 2015).	Physical disturbance and strike could be potentially result in adverse effects on sea turtles from training and testing activities within the Study Area. Sea turtle mortality in Guam waters has resulted from vessel strikes.	DoAg-DAWR
20	1	3.5-18	3.5.2.1.2.1	Accounting for Mitigation	Procedural mitigation measures include a power down or shut down (i.e., power off) of applicable active sonar sources when a sea turtle is observed in a mitigation zone.	How effective was sea turtle sightings during previous MITT exercises to trigger power down or shut down? How is this procedural mitigation used during night trainings? Is this	DoAg-DAWR

No.	Vol.	Page	Section	Subject	Statement	Comment	Commenter
21		3.5-33	3.5.2.2.2.1	Accounting for Mitigation	Procedural mitigation measures include delaying or ceasing applicable detonations when a sea turtle is observed in a mitigation zone.	Is the use of explosives only for daytime hours during the exercise? If explosive use is during night hours, how is sea turtles detected? What mitigation is taken?	DoAg-DAWR
22		3.6-1	3.6.1	Affected Environment	As presented in the 2015 MITT Final EIS/OEIS, the habitat found within the MITT Study Area supports a wide diversity of resident and migratory marine birds, with regionally important rookeries for numerous species on FDM.	Migratory and resident seabirds are found in Apra Harbor, Piti and Agat (all within MITT Study Area on Guam).	DoAg-DAWR
23		3.6-2	3.6.1.3	Flight Altitudes		Examples used are irrelevant, as they should include species of more relevance with in the MITT study area. Not all seabirds behave similarly.	DoAg-DAWR
24		3.5-5	3.6.1.6	General Threats	Extensive biosecurity planning by range operators is in place for land-based training activities on FDM to prevent the accidental introduction of other invasive species, such as the brown treesnake.	Little fire ant should also be addressed to prevent accidental introduction on FDM.	DoAg-DAWR
25	1	3.6-	3.6.2	Population –Level	Compared to the numbers of	Mitigation for Navy should	DoAg-

No.	Vol.	Page	Section	Subject	Statement	Comment	Commenter
		10		Impact Analysis	great frigatebirds estimated throughout central and western Pacific (10,000 pairs in the Hawaiian Islands, with other colonies on Howland, Baker, Jarvis, Johnston Atoll, and Christmas Island), and the apparent low numbers of great frigatebirds from historic times through the present within the Mariana archipelago, the direct and indirect effects on effects of military activities on FDM would not represent a significant adverse impact on the population of the great frigatebird.	include funding for translocation of great frigatebirds from the 10,000 pairs in the Hawaiian Islands to the Mariana Islands to compensate the loss of individuals occurring on FDM from military exercises.	DAWR
26	1	3.6-10	3.6.2	Population –Level Impact Analysis	Based on the long-term use and stability of the masked booby breeding population on FDM and the wide geographic range and abundance of the masked booby throughout the Pacific, the effects of military use of FDM would not represent a significant adverse impact on the population of the masked booby.	Mitigation for Navy should include funding for translocation of masked booby from the 2,500 pairs in the Hawaiian Islands to the Mariana Islands to compensate the loss of individuals occurring on FDM from military exercises.	DoAg-DAWR
27	1	3.6-	3.6.2.1.3.1	Impacts from		Visual stressors should also be	DoAg-

No.	Vol.	Page	Section	Subject	Statement	Comment	Commenter
		14		Aircraft Noise Stressors Under Alternative 1		addressed. During daytime exercises, marine birds (at rookery) will be exposed by visual stressors from aircrafts, resulting to disturbance.	DAWR
28	2	3.8-2	3.8.1.3	Endangered Species Act- Listed Species	Only three coral species (<i>Acropora globiceps</i> , <i>A. retusa</i> , and <i>Seriatopora aculeata</i>) are listed under the ESA and occur in the Study Area (Table 3.8-1).	Mitigation should include to avoid areas where the 3 listed coral species occurs in the Study Area.	DoAg-DAWR
29	2	3.8-17	3.8.3	Public Scoping Comments	The majority of these materials are expended in open ocean areas where impacts on biological communities, such as coral reefs, would be minimized.	Marianas Trench occurs in open ocean areas within the MITT Study Area. EIS should address cumulative impacts from military expended materials as marine debris to inverts found in the Mariana Trench.	DoAg-DAWR
30		3.10-4	3.10. 1.3.1	Micronesian megapode	FDM was surveyed more thoroughly in December 2007 by Navy biologists, who estimated 21 adult pairs (U.S. Department of the Navy, 2008b, 2008c). The most recent survey for megapodes on FDM was completed in 2013, when Navy biologists detected 11 megapodes while surveying a limited transect in the north part	Data used is outdated. There should have been an updated survey prior the drafting of the MITT EIS/OEIS. Status could change from 2013, as megapodes are opportunistic species. More so, since CNMI has been through numerous typhoon events in after 2013.	DoAg-DAWR

No.	Vol.	Page	Section	Subject	Statement	Comment	Commenter
31	2	3.10-4	3.10.1.3.2	Mammals	of the island (Impact Areas 1 and 2) (U.S. Department of the Navy, 2013b). Since the publication of the 2015 MITT Final EIS/OEIS, no new information on the Mariana fruit bat life history or status on FDM is available.	The last surveys conducted in FDM occurred in 2007. Fruit bat monitoring in FDM is needed, as the species are opportunistic. Fruit bat in FDM may occur, especially after storm event passing through the Mariana Islands.	DoAg-DAWR
32	2	3.10-8	3.10.2.1.1	Impacts from Acoustic Stressors		MITT EIS/OEIS should also include impacts to visual stressors from fixed-winged aircrafts.	DoAg-DAWR
33	2	3.10-15	3.10.2.4.	Secondary Stressors		In regards to potential introduction of invasive species, MITT EIS should address other invasive species such as the Little fire ant.	DoAg-DAWR
34	2	3.10-53	3.10.3.1.1.2	Alternative 1- Acoustic stressors - Terrestrial Species and Habitats	...the most important stressors to wildlife communities... on FDM are 1. percussive force ... 2. habitat alteration ...	Fruitbats and megapodes in FDM will be impacted, mitigation is needed to address both species	DoAg-DAWR
35	1	3.9-40	3.9.2.2.1.1	Injury	Injury refers to the direct effects on the tissues or organs of a fish.	Injury of fish is not limited to organ, hearing and buoyancy systems. Mortality has been observed after underwater	DoAg-DAWR

No.	Vol.	Page	Section	Subject	Statement	Comment	Commenter
36	1	5-43	Table 5.3-10	Procedural Mitigation Description	Procedural Mitigation for Explosive Mine Countermeasure and Neutralization Activities	detonations on Guam involving damage of hard integument, such as found on boxfish and cowfish. Hammerhead sharks need to be added to resources being protected. Sightings of hammerheads on Guam are most frequent in Apra Harbor and around the entrance. Both Agat and Piti detonation zones are within sighting areas.	DoAg-DAWR
37	1	3.4-4	3.4.1.4	Habitat use	Many factors influence the distribution of marine mammals in the study area.	Seasonal migration and breeding are important factors in the spatial and temporal distribution of marine mammals in the study area as well. These are documented by both local and federal resource agencies	DoAg-DAWR
38	1	3.4-8	3.4.1.7.3	Bycatch	Fishery bycatch is likely the most impactful threat to marine mammal individuals and populations and may account for the deaths of more marine mammals than any other cause.	Entanglement generally involves longline fishing or purse seining. Neither activity occurs within Guam's local or federal EEZs	DoAg-DAWR
39	1	3.4-17	3.4.1.9.2	Bryde's whale geographic range		Bryde's whale have been seen 3 times in the months of July and	DoAg-DAWR

No.	Vol.	Page	Section	Subject and distribution	Statement	Comment	Commenter
40	1	3.4-28	3.4.1.17.5	Cuvier's Beaked whale species specific threats	Recap of strandings in the Mariana islands	August near Guam, and a dead individual washed up on Guam's west coast in August, 2014 Several strandings are not mentioned in the recap. This information is available from local and federal resource agencies.	DoAg-DAWR
41	1	3.4-29	3.4.1.18.5	Dwarf Sperm whale species specific threats	Fisheries interactions	Entanglement generally involves longline fishing or purse seining. Neither activity occurs within Guam's local or federal EEZs	DoAg-DAWR
42	1	3.4-259	3.4.5	ESA Determinations	Interactions with ESA listed marine mammals	Sperm whales have been documented pupping off of the coast of Agat, and have been seen with young along the same coast in subsequent years.	DoAg-DAWR
43	1	3.5-5	3.5.1.5	Sea Turtles	General Threats	There have been 5 turtle deaths by vessel strike in Apra Harbor since 2011. Increased vessel traffic must be mentioned as a threat as well.	DoAg-DAWR
44	2	3.12-18		Number of days per year affected by military	Graph depicting number of days W-517 is affected by military activities	In 2016, around 140 days, in 2017, 120 days, in 2018, 82 days. An average of around 90	DoAg-DAWR

No.	Vol.	Page	Section	Subject	Statement	Comment	Commenter
				activities at W-517		days per year since 2010	