

**RESPONSE TO COMMENTS FROM AUBREY MOORE ON PA MEMO # 1 NORTH FINEGAYAN FOREST ENHANCEMENT SITES (FES),  
NAVAL BASE GUAM TELECOMMUNICATIONS SITE (NBGTS), FINEGAYAN, GUAM (RC2021-0952)**

15, February 2022

Comments	DON Responses
<p>1. It should be noted that <i>Vitex parviflora</i> is the fifth most abundant tree in Guam's forests [Guam's Forest Resources: Forest Inventory and Analysis, 2013]. Removal of this tree species and other common invasive plant species is likely to cause massive ecological damage to the forest that NAVFAC is trying to enhance. I am pretty sure that NAVFAC has results from recent biological surveys of the area of concern. However, no data are provided indicating how many trees are to be killed and removed.</p>	<p>While your comments do not pertain to historic preservation or the Section 106 process, for which the PA Memo process is intended serve, we have considered your comments and wish to clarify some points. The Forest Enhancement Sites (FES) have a significant number of <i>Vitex parviflora</i> trees, which in many areas are growing over and around native tree species. Sudden removal of these trees would dramatically and quickly alter the environment, potentially harming some native species. Invasive plant and tree removal plans will be developed for smaller subsections within the FES, taking into account the presence of native species, the area affected, and other site conditions. A combination of methods - direct felling, herbicide application, girdling, or hack-and-squirt - will be used to minimize environmental concerns while removing invasives. Based on recent and ongoing University of Guam research, herbicide treated <i>Vitex</i> trees take some time to die and even more time to decompose, with trees standing more than a year after herbicide application. Based on this slow rate of decomposition and the phased approach to invasive removal, it is not expected that these removal actions will create significant coconut rhinoceros beetle (CRB) breeding areas.</p>
<p>Another concern is disposal of greenwaste produced by this and other projects. Dead trees including root balls which are left to rot in place will become coconut rhinoceros beetle breeding sites. Alternatively, disposal of greenwaste by physically removing material from the forest enhancement sites is likely to become coconut rhinoceros beetle sites wherever it is dumped unless it is carefully managed. NAVFAC does not provide a disposal plan.</p>	<p>For trees that must be direct felled, the contractors involved will develop green waste management plans in consultation with the Government to avoid creating CRB breeding area and to prevent movement of non-target species such as little fire ant. Buildup projects typically require in-place management of green waste so these materials will not be disposed of off-site.</p> <p>Root balls left in place may also serve as planting areas for new native plants, in a technique successfully used by the Guam Department of Agriculture Forestry Division at sites around the island.</p>

**From:** [Aubrey Moore](mailto:Aubrey.Moore)  
**To:** [office@senatorperez.org](mailto:office@senatorperez.org)  
**Cc:** [patriasablan@gmail.com](mailto:patriasablan@gmail.com); [CRIWebComment](#)  
**Subject:** [Non-DoD Source] Comments on PA Memo 1: Forest Enhancement Sites  
**Date:** Thursday, August 5, 2021 1:26:28 AM

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Hafa Adai Senator Perez,

Ms. Patria Untalan asked for my opinion on a NAVFAC document entitled *North Finegayan and Finegayan Forest Enhancement Sites*. According to NAVFAC “This PA [Programmatic Agreement] memo is required by Stipulation IV.E.2.a of the PA as a means for interested members of the public to provide comments on the identification and evaluation of historic properties.”

Ms. Untalan asked me to help her prepare comments on potential ecological damage rather than damage to “historic properties”. The document is almost devoid of substantive details on which to comment. However, I do have concerns about bullet point 3 under the Project Description heading:

- Removal of invasive plants introduced after European contact, including trees such as *Vitex parviflora* and *Spathodea campanulata*. A variety of removal methods will be used, including herbicides, girdling with herbicides, and direct cutting of some large trees. Root balls will not be removed but will be treated with herbicide to prevent regrowth.

It should be noted that *Vitex parviflora* is the fifth most abundant tree in Guam’s forests [Guam’s Forest Resources: Forest Inventory and Analysis, 2013]. Removal of this tree species and other common invasive plant species is likely to cause massive ecological damage to the forest that NAVFAC is trying to enhance. I am pretty sure that NAVFAC has results from recent biological surveys of the area of concern. However, no data are provided indicating how many trees are to be killed and removed.

Another concern is disposal of greenwaste produced by this and other projects. Dead trees including root balls which are left to rot in place will become coconut rhinoceros beetle breeding sites. Alternatively, disposal of greenwaste by physically removing material from the forest enhancement sites is likely to become coconut rhinoceros beetle sites wherever it is dumped unless it is carefully managed. NAVFAC does not provide a disposal plan.

Thank you for your consideration.

Aubrey Moore PhD

Entomologist

University of Guam