

Compatibility Determination for Traditional Gathering at Guam NWR
Comments and Responses – November 2020

I. INTRODUCTION

During the 30-day public comment period ending October 30, 2020, the U.S. Fish and Wildlife Service (USFWS) received written comments, with 2 e-mail letters in support of allowing Traditional Gathering at Guam National Wildlife Refuge (Refuge). No comment responses opposing the activity were received. Comments and questions with the Service responses are summarized below.

II. COMMENTS RECEIVED, RESPONSES

Copies of the actual letters are not reprinted here, however, comments have been paraphrased to reflect the comment provided. The Service responses immediately follow the comment/question(s).

Comment 1: There is ongoing ethnobotanical research at Litekyan. Results will be shared with traditional knowledge holders and the Refuge. It is hoped that the information can be used to sustain traditional healing practices and the use of traditional foods at the refuge, and further develop rules and regulations benefiting the community, healers, and the refuge's biodiversity.

USFWS Response: *The Service welcomes the ethnobotanical research in support of traditional gathering practices at the Guam NWR. One of the Refuge Goals is to **Protect, preserve, evaluate, and when appropriate, interpret the Refuge's CHamoru cultural resources and associated practices.** The Service encourages cooperative partnerships for the study and preservation of cultural resources and will continue to provide opportunities for cultural practitioners to participate in cultural practices such as collecting medicinal plants on the Refuge. The Service will bring Yo'ãnte, suruhanas, and biologists together to expand our knowledge to help sustain traditional gathering opportunities.*

Comment 2: How would gatherers obtain their permits?

USFWS Response: *At present, people may obtain plant collection permits for use that day at the Ritidian Unit Nature Center with a valid driver's license and vehicle registration. Gathering is allowed during daylight hours between 8:00 a.m. and 3:00 p.m. only. Plant collection permits will not be issued after 2:30 p.m.*

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Comment 3: Instruction signage for permits should be posted at Refuge entrance.

USFWS Response: *As noted in the CD cost itemization table, the Service plans to develop and install at least 2 plant collection regulation signs in visible locations at the Refuge.*

Comment 4: Can blades on the ends of long poles be used to harvest lemmai and niyok to avoid climbing?

USFWS Response: *Yes, as long as no other vegetation is cut or removed when collecting plants. The cutting of coconut fronds and lemmai branches, cutting or pulling vines out of trees, or damaging adjacent vegetation while harvesting is prohibited.*

Comment 5: What about harvest of seeded breadfruit, *Artocarpus mariannensis* or dukduk?

USFWS Response: *Yes. Dukduk has been added to final CD for clarification. The limit of 10 per collection day may be a combination of lemmai and/or dukduk breadfruits.*

Comment 6: What about harvest of lada, papaya, talisai, kafu, or pãhong?

USFWS Response: *Lada (*Morinda citrifolia*), papaya (*Carica papaya*), talisai (*Terminalia catappa*), pãhong (*Pandanus dubius*), and kafu (*Pandanus tectorius*) are all food supply for the endangered fanihi (*Mariana fruit bat- Pteropus mariannus*) and may not be harvested.*

Comment 7: What about harvest of bananas and guava?

USFWS Response: *We do not have bananas or guava on the Refuge at the moment; if we discover either of them in the future we would remove/eradicate them as invasive species.*

Comment 8: Should fadang be added to the list of plants that are not allowed to be gathered?

USFWS Response: *Yes. Fadang (*Cycas micronesica*) has been added to the list of plants that may not be collected at the Refuge due to island-wide mortality and on-going threats to this species.*