

February 16, 2010

Dear JGPO and Department of Defense,

The undersigned cultural organizations present this unified comment, focusing on issues raised in the DEIS relevant to the livelihood and existence of the indigenous Chamorro people and their land.

## 1. Issue: Proposed Build-Up Undermines Chamorro Survival

### DEIS References:

The DEIS states, “Guam's indigenous Chamorro population has strong concerns about whether incoming military populations would recognize them as both American by nationality and also as a unique ethnic culture worthy of respect and preservation. This could be mitigated by orientation programs designed in cooperation with the Department of Chamorro Affairs. However, an expansion in non-Chamorro voting population could eventually affect the proportion of Chamorro office-holders and government workers; thereby affecting the current government budgets and activities dedicated to cultural issues and practices. It could also affect outcomes of any future plebiscites about Guam's political status.” (Volume 7, Chapter 3, page 3-64)

The DEIS further states, “Overall, the analysis indicates a sustained increase of approximately 33,500 people on Guam. Most of these people would have political rights as U.S. citizens. Therefore, their sustained presence could affect Chamorro culture in a number of ways, politically and culturally.” (Volume 2, Chapter 16, Page 16-91)

“A reduction in Chamorro voting power may also be felt on the policy level. For example, it is commonly agreed among Chamorro politicians that public funds should be spent to support funeral and wake activities. However, non-Chamorro elected officials may not appreciate this cultural tradition and support such things.” (Volume 2, Chapter 16, Page 16-91)

The DEIS states in Volume 3, chapter 16, page 18, that “Restriction to certain sites during construction and operation would cause significant adverse impact to Tinian’s economy, particularly: tourism, ranching, and the collection and selling of wild chili peppers. While Tinian’s tourism may benefit from an increase in visitors from Guam due to the population growth there, restricted access to popular sites would negatively affect the island’s tourism economy[.]”. The same section goes on to state that “Tinian ranchers would also be impacted by closure of the land required to build the proposed training ranges. Ranchers have historically exercised grazing rights in the military lease area, through a lease-

back agreement. This agreement required the municipal government to pay a dollar per acre per year to lease back particular areas. Because the municipal government has been behind on payment for several years, grazing rights have been allowed on a month-to-month basis. The military would terminate the grazing rights to build the proposed ranges, causing significant adverse economic impact. Tinian ranchers would have to utilize a diminished amount of available grazing land in the southern third of the island. Finally, loss of access to training areas would mean loss of local gathering access to the wild chili peppers (*Capsicum annum*) locally known as *donnisali*, a Tinian export. Many residents earn money by collecting these peppers, nearly all grown in the military lease area.”

## 2. Issue: Proposed Build-Up Threatens Chamorro Language

### DEIS Reference:

The DEIS states, “while the loss of the Chamorro language has been occurring for years on Guam, it may be accelerated with the military build-up.” (Volume 2, Chapter 16, Page 16-91)

## 3. Issue: Build-Up Threatens Important Chamorro Cultural Sites

### DEIS References:

The DEIS states, “During construction on Guam there are potential significant adverse direct impacts to approximately 34 NRHP-eligible or listed archaeological resources on Guam and 10 on Tinian, all of which would be mitigated to less than significant through mitigation. Six architectural resources sites would be impacted.” (Volume 7, Chapter 3, page 3-41)

The DEIS states, “The proposed firing ranges for Alternatives A and B associated with the proposed action are located on the Route 15 valley and escarpment east of Andersen South.... The Pagat Site Complex includes at least 20 latte sets, more than 50 mounds of artifacts and midden, remnants of trails, more than 30 mortars and grinding areas, an unknown number of caves and rock shelters, and other features (Carson and Tuggle 2007).” (Volume 2, Chapter 12, page 12-19)

The DEIS further states, in Volume 5, Chapter 12, that for areas that have not been inventoried for historic properties, the DoD would record surface sites and, when possible, such areas would also be archeologically sampled for subsurface sites when easily obtainable (i.e. without having to demolish existing facilities or infrastructure).

#### 4. Issue: Build-Up Threatens the Chamorro Natural Habitat

##### DEIS References:

The DEIS documents the extensive damage to Guam's reefs, wetlands, and other natural habitat. Volume 4: Aircraft Carrier Berthing proposes a host of destructive environmental activities, including dredging, disposal of dredged material, shoreline stabilization, marine life threats and biosecurity threats. The cumulative and multiplicative impacts of these specific actions represent a threat to the ecosystem of the entire Marianas archipelago.

The DEIS states in Volume 6, chapter 6 (section 6.2.3.1) that Basic Alternative 1 would "consist of installation of up to 22 new potable water supply wells at Andersen Air Force Base (AFB), rehabilitation of existing wells, interconnection with the GWA water system, and associated T&D systems. A new 5 MG (19 ML) water storage tank would be constructed at ground level at Finegayan." The same section goes on to state that under Basic Alternative 1, "proposed well construction activities would result in the potential for a temporary increase in stormwater runoff, erosion, and sedimentation. Construction would involve land disturbing activities greater than an acre in size that would trigger the requirement for a construction stormwater permit. Therefore, this portion of the alternative would result in impacts on water resources. These impacts would be minimized through the use of BMPs as required through the construction stormwater permit. General construction BMPs (Volume 2 Chapter 4 Table 4.2.1) would be implemented to reduce the potential for erosion, runoff, sedimentation, and associated surface water quality impacts, which would also reduce potential impacts to groundwater and nearshore water resources. Proposed construction activities would not occur within the 100-year flood zone." It states further that based on a preliminary review of GIS data, "the proposed water main construction footprint associated with Alternative 1 appears to occur through and/or adjacent to several delineated and NWI-indicated wetlands (Figure 6.2-1). Specifically, based on GIS analysis, the proposed water main line construction corridor (for the purposes of this analysis, we assumed a 24 ft [7.3 m]-wide corridor) would overlap approximately 1.27 acres (0.51 ha) of NWI-indicated wetlands. Upon discovering this potential area of direct impact, a TEC biologist surveyed the entire proposed water main course to ground truth the GIS data. Upon inspection, it was determined that the proposed water main line construction footprint would occur in previously disturbed areas within the existing utility easement, outside of the identified potential wetland areas. No direct impacts to delineated or NWI-indicated wetlands would occur." It states further that "The Navy would strive to avoid directly impacting, to the greatest extent possible, the delineated and NWI-indicated wetland areas adjacent to the water main footprint in the design and construction phases of the water main; however, for the purposes of this analysis at this time, it is assumed indirect, temporary impacts would occur. During construction, indirect impacts to nearby wetland areas would be minimized by incorporating site-specific appropriate BMPs (Volume 2 Chapter 4 Table 4.2.1)

that would reduce the potential for indirect construction impacts to these wetland areas. Therefore, construction activities associated with Alternative 1 would result in less than significant impacts to water resources.”

Numerous native trees and plants will also be destroyed in the proposed build-up. The DEIS states in Volume 2, chapter 12 that traditional natural resources such as the “nunu tree, dukduk tree, ifit tree, and da’ok tree” are in danger of destruction (Volume 2, Chapter 12, page 12-57 and passim). The trees identified in the DEIS are culturally significant, used by canoe builders, artisans, and respected by the indigenous Chamorros.

Guam’s endangered species and other biological species would also be threatened in the proposed build-up. As the DEIS states, “The preferred alternatives would significantly impact terrestrial biological resources on Guam and Tinian during construction activities due primarily to the removal of habitat” (Volume 7, Chapter 3, Page 3-27). Endangered species such as the Mariana fruit bat, Micronesian kingfisher, Mariana crow, Green Sea Turtle, and Hawksbill Sea Turtle, among others, would experience significant, adverse effects (Volume 7, Chapter 3, Pages 3-27 to 3-28).

## **5. Issue: Build-Up Threatens Chamorro Economic Stability**

### DEIS Reference:

The DEIS states, “According to Chapter 16 of this EIS/OEIS, the proposed action [the build-up] would have several adverse socioeconomic impacts. Implementation of the proposed action would result in a “boom then bust” effect where the population on Guam would increase rapidly through 2014 during the construction phase, and then decrease rapidly after 2014 before leveling off. This cycle would lead to a construction downturn and the creation of an economic environment that meets standard definitions of an economic recession (e.g. decrease in jobs and civilian labor force income). With implementation of the proposed action, the cost of goods and services would rise with the increase in population, but may not be matched by an increase in income. Further, high housing costs, crowding, and/or homelessness may occur if the construction phase housing demand is not met at the construction peak.” (Volume 2, Chapter 19, Page 19-14)

## **6. Issue: Build-Up Threatens Chamorro Physical and Mental Health**

### DEIS Reference:

The DEIS explicitly identifies threats to Chamorro health and life that will likely occur as a result of the proposed build-up. For example, in Volume 2, Chapter 18, the DEIS states, “Without corresponding increases in health care providers, potential health and safety impacts could include:

- Longer wait/response times for patients
- Fewer or no available providers on island for chronic or acute issues
- Complications or death from delayed treatment, and/or
- Requirements for patients to travel off-island to receive adequate treatment” (Volume 2, Chapter 18, Page 18-16).

Threats to human health due to increased noise levels are also identified in the DEIS. Volume 2, chapter 16 states, “In ‘A Report on the Aircraft Noise as a Public Health Problem in Okinawa,’ studies showed that aircraft noise exposure resulted in a wide range of physical and mental consequences that included sleep disorders, hearing loss, higher rates of low birth weight infants, fatigue, neurosis, and negative effects on children (Asahikawa Medical College 2000).” (Vol 2, chap 16, page 16-34). Despite the noted ill effects of noise exposure, the DEIS enshrines discrimination between on-base and off-base communities in Guam by providing for sound-proofing but only for those homes located on the bases, with no proposed mitigation for adverse noise effects outside the military bases.

Chamorro physical and mental health is further endangered by the proposed build-up as the DEIS states that access to native plants used by Chamorro healers (*suruhanu* and *suruhana*) to produce herbal medicines will cease in particular areas. The cessation of this cultural practice not only endangers Chamorro access to health care and medicine, but also violates the indigenous right to traditional intellectual property – in this case, to the production and dissemination of traditional herbal remedies. Pagat Village, for example, is one important site accessed by herbal healers. The DEIS states, “Potentially affected resources include: Guam International Raceway, Marbo Cave, Pagat Trail and associated trails in the vicinity, cultural gathering activities (*suruhana*), and off-shore fishing near Marbo Cave. Implementation of Alternative 1, regardless of the Training Complex Alternatives A or B, would cause the cessation of the present activities at all the resources mentioned because the Known Distance (KD) Range Complex is proposed in that location” (Volume 2, Chapter 19, page 19-11).

Further, DEIS Table 19.2-3, “Summary of Training Impacts – Firing Range Alternatives” states that there will be Significant Impact due to the “Loss of access to and use of recreational resources (Guam International Raceway, Marbo Cave (spelunking and offshore fishing), Pagat Trail and associated trails, *suruhana* activities (Volume 2, Chapter 19, page 19-22).

The proposed build-up also poses threats to the psychological health of the Chamorro people, in one part through the DEIS proposal to construct firing ranges in the vicinity of Pagat, a village where ancestral human remains of the indigenous Chamorro people are presently located. This proposed action will exact inmitigable psychological injury to the Chamorro people. Such firing ranges are incompatible with the cherished notion of resting in peace.

## **7. Issue: Build-Up DEIS Process Failed to Seek Input from Indigenous Cultural Practitioners**

DEIS Volume 9: Socioeconomic Impact Assessment Study, Appendix F, pages 463-580, contains transcripts of "February 2009 Guam Interviews," identifying many organizational representatives on Guam whose input was sought in the process of preparing the DEIS. This section of the DEIS incontrovertibly demonstrates that JGPO failed to include the perspectives of Guam's many indigenous practitioners, although numerous other government and civic organizations were consulted.

JGPO's failure to consult with organizations representing the indigenous community constitutes a significant breach of established procedure.

### **Discussion:**

Together these passages from the DEIS indicate that the proposed Department of Defense actions will result in highly significant negative impacts on the Chamorro people. These include, as the DEIS asserts, a rapid and intense minoritization of Chamorros that will threaten the demographic integrity of the Chamorro population of Guam, endangering culturally significant issues and programs, including Chamorro language and cultural programs, and historic preservation and restoration programs. Irreparable damage will be inflicted upon Guam's natural habitat, further adversely affecting already endangered species, encroaching upon the Chamorro people's right to a clean, healthy environment, and survival in their homeland.

Resolving Guam's on-going colonial status would also be threatened, as the increased minoritization of Chamorros would subvert any real movement towards the fulfillment of Chamorro self-determination, their right to decolonization, and the holding of a plebiscite in which they alone would determine the next political status of Guam. This directly violates United Nations' mandates concerning the rights of the peoples of non-self-governing territories.

The DEIS-predicted economic recession on Guam will be potentially catastrophic for many Chamorro families, especially those living near or below the poverty line. Limited access to fishing, hunting, and foraging grounds due to environmental destruction caused by the build-up will further restrict Chamorro opportunities to obtain any real level of subsistence, an aspect of sustainability inextricably linked to the fundamental right of self-determination.

The DEIS documents that access to health care will be jeopardized, and, as the DEIS points out, with rates of dialysis five times higher than the U.S. mainland (and having increased by 540% in the last 10 years), health care access is more critical than ever. Guam's increased population as a result of the proposed build-up will cause certain crises at the Guam Memorial Hospital, the Department of Mental Health and Substance Abuse, and the Department of Public Health and Social Services. The DEIS states that there will be 54,649 more patients relying upon GMH services and nearly 30,000 additional clients

at Public Health and Social Services and Mental Health and Substance Abuse (Vol. 9, Appendix K, Pg. 61, Table 4.4-29). To mitigate against the extreme duress this will place upon Guam's health care system, the DEIS proposes to increase the number of physicians on Guam by 15, still be substandard to the national average of 29.5 physicians for every 10,000 people. This is but one example of DEIS mitigations that trivialize the diminishing quality of life for Guam's people that will result from the proposed build-up.

Indeed, the DEIS points to numerous negative effects of the proposed build-up – literally every aspect of life will be adversely affected and the very livelihood of the Chamorro people is at risk. **Because of the devastating effects on the Chamorro people, land, culture, and natural resources that will occur as a result of the proposed build-up, the US DoD must take aggressive, responsible actions to mitigate against these many effects, which amount to physical and cultural genocide. The mitigation measures included in the DEIS are grossly insufficient to prevent the cultural and physical genocide that the proposed build-up projects, and instead offer only superficial palliatives for what should be a critical concern.**

**In conclusion, the DEIS statements highlighted above reflect JGPO's explicit awareness that the proposed build-up will have a significant, negative impact on the Chamorro people's continued existence as an indigenous group. As such the Department of Defense is required by law to seek reasonable forms of mitigation or seek appropriate alternatives, including a genuine "NO ACTION" alternative.**

**Preferred Alternative:** In order to protect the human and natural resources of our homeland, we support the **"NO ACTION" Alternative for all proposed Department of Defense actions covered in the DEIS.** In other words, the signatories to this document posit that there be NO MILITARY BUILDUP on Guam.

**Mitigations:** In the event that our proposed **"NO ACTION" Alternative is rejected by the DoD, we DEMAND the following mitigations:**

1. Engage in UN-sanctioned decolonization process on Guam, to include federal funding for an island-wide educational campaign, as well as plebiscites for self-determination and decolonization, the outcomes of which must be explicitly, unequivocally recognized by the US and the UN;
2. Full and sustained federal funding for War Reparations;
3. Full and sustained federal funding for Chamorro language immersion schools and charter schools for grades K-12, located in the south, central, and northern Guam;
4. Full and sustained federal funding for after-hours language programs for Adults;
5. Full and sustained federal funding of the Guam Museum;
6. Full and sustained federal funding of a Chamorro Cultural Center;
7. Full and sustained federal funding of an Artisans-in-Training program at GCC;

8. Full and sustained federal funding for a Chamorro Studies Programs at DOE, GCC and UOG;
9. Full and sustained federal funding for Chamorro language publications;
10. Full and sustained federal funding for Chamorro cultural practitioners and organizations;
11. Full and sustained federal funding for the educational website Guampedia;
12. Full and sustained federal funding for the preservation of historic structures both on and off-base;
13. DoD application of Sumay Village as a National Historic District, as well as the 134 other historical sites on DoD property that qualify for registry on the NRHP;
14. Begin development of a Status of Forces Agreement (SOFA) with Guam with relevant US Federal agencies;
15. Full use of US Naval hospital for all related military build-up in-migrants to Guam, since the island's existing health care facilities are not equipped;
16. Full and appropriate restitution for persons afflicted with diseases from toxic chemicals or radiation, in the past and future. To this end, RECA compensation must include all people on Guam and their descendants who have been affected by downwind exposure;
17. Department of Defense must implement a comprehensive cleanup program of all sites in Guam's land and water which have become contaminated as a result of US military activities;
18. Cessation of nuclear testing or development activities in or around the Marianas archipelago and the wider Micronesian region;
19. Prohibition of all military personnel declared as sex offenders to reside in civilian properties;
20. Guam legal jurisdiction over all military personnel who violate Guam laws;
21. Reimbursement of compact-impact monies to the Government of Guam, appropriate to the actual costs incurred;
22. Adherence by the U.S. government to the long-established body of international laws of decolonization and assurance that transient and new arrivals to Guam as a result of the military buildup will not participate in any self-determination referendums vouchsafed to the people of Guam under United Nations General Assembly resolutions;
23. Adherence by the U.S. government to the corpus of international human rights laws, including the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social, and Cultural Rights, the Declaration on the Rights of Indigenous Peoples; and
24. Protection of the attached list of 75 indigenous medicinal plants that are integral to the culture and health of the Chamorro people. None of these plants should be harmed or destroyed in the proposed buildup.

We recognize that the DoD may not have the authority to implement all of these mitigation options, but we expect that they will take all necessary actions to assure that the responsible federal agencies will see through their implementations.

Name	Organization	Email
Frank Cruz	TASI	
Frank Rabon	Pa'a Taotao Tãno'	
Ronald T. Laguana	Young Men's League of Guam/ Department of Education: Chamorro Studies Division	
Cathleen Cruz	Rasan Acho' Latte	
Eileen R. Meno	Irensian Taotao Tano'	
Adam Paul Diego	Hale' I Taotao-Ta	
Barbara Tainatongo	Katon I Tano' Cultural Dance Group	
Trini Torres	Taotaomo'na Native Rights	
Darnell Lujan	Taotao Tãno'	
Hope Cristobal	Chamorro Studies Association	
Vivian Dames	Fuetsan Famalao'an	
Michael Lujan Bevacqua	Famoksaiyan (Guam)	
Melvin Won Pat Borja	We Are Guahån	
Vince Reyes	Inetnon Gefpãgo	
Dana Cruz-Kim	Taotao Lãgu	
Lisa Natividad	Guahån Coalition for Peace	



## ATTACHMENT

### Medicinal Plants of Northern Guam Limestone & Ravine Forests and Beach Strand Communities

CHAMORRO NAME NAME	SCIENTIFIC NAME	COMMON
1. Alalak abubu morning glory	<i>Stictocardia tiliifolia</i>	Crimson
2. Amot haga' (caper)	<i>Crataeva speciosa</i>	Crataeva
3. Agaga	<i>Melothria guamensis</i>	None
4. Agate'lang	<i>Eugenia palumbis</i>	None
5. Ahgao manila	<i>Premna obtusifolia</i>	False elder
6. Akangkang	<i>Caesalpinia major</i>	Hawaii pearls
7. Alaihai morning glory	<i>Ipomoea pes-caprae subsp. brasiliensis</i>	Beach
8. Ilangilang	<i>Cananga odorata</i>	Ylang Ylang
9. Atmahayan pipturus	<i>Pipturus argenteus</i>	Silvery
10. Anonas	<i>Annona reticulata</i>	Custard apple
11. Apasoti	<i>Chenopodium ambrosioides</i>	Wormseed
12. Aplokatang	<i>Psychotria mariana</i>	Psychotria
13. Atmagosun halomtano'	<i>Momordica charantia</i>	Bitter melon
14. Alum	<i>Melanolepsi multiglandulosa</i>	None
15. Amot tumaga'	<i>Cassia occidentalis</i>	Ant bush
16. Banalo rosewood	<i>Thespesia populnea</i>	Pacific
17. Batbena	<i>Heliotropium indicum</i>	Wild clary
18. Bayoggon dangkulu bean	<i>Entada phaseoloides</i>	St. Thomas
19. Bayoggon dikiki', gaye'	<i>Mucuna gigantea</i>	Small sea bean
20. Botdologas	<i>Portulaca oleracea</i>	Purslane
21. Chachakchak	<i>Mariscus javanicus</i>	Sedge
22. Da'ok	<i>Calophyllum inophyllum</i>	Palomaria
23. Dadangse'	<i>Urena lobata</i>	Ceasar weed
24. Derris	<i>Derris elliptica</i>	Derris
25. Eskobiya	<i>Sida rhombifolia</i>	Broomweed
26. Fofgo morning-glory	<i>Ipomoea hederacea</i>	Ivy leaf
27. Gaogao Uchan	<i>Phyllanthus marianus</i>	Phyllanthus
28. Gapgag arrowroot	<i>Tacca leontopetaloides</i>	Polynesian

29. Gaso'so' nakedwood	<i>Colubrina asiatica</i>	Asian
30. Galak fedda' fern	<i>Asplenium nidus</i>	Bird's nest
31. Hamlak	<i>Callicarpa candicans</i>	Beautyberry
32. Hunek heliotrope	<i>Tournefortia argentea</i>	Tree
33. Ka'mang tasi	<i>Abelmoschus sp.</i>	Muskmallow
34. Katson	<i>Stachytarpheta cayennensis</i>	Blue rat's tail
35. Kahlao	<i>Phymatodes scolopendria</i>	Wart fern
36. Kulales plant	<i>Abrus precatorius</i>	Coral bead
37. Ladda mulberry	<i>Morinda citrifolia</i>	Indian
38. Laso' katu flower	<i>Achyranthes aspera</i>	Prickly chaff-
39. Dokdok breadfruit	<i>Artocarpus marianensis</i>	Seeded
40. Lemmai	<i>Artocarpus altilis</i>	Breadfruit
41. Lodogao quinine	<i>Clerodendrum inerme</i>	Garden
42. Luluhot	<i>Maytenus thompsonii</i>	None
43. Mai'agas	<i>Cassytha filiformis</i>	Love vine
44. Maigo' lalo'	<i>Phyllanthus amarus</i>	Chanca peidra
45. Mango'	<i>Curcuma longa</i>	Turmeric
46. Masiksik	<i>Chromolaena odorata</i>	Bitter bush
47. Masiksik tasi	<i>Wollastonia biflora</i>	None
48. Matbas	<i>Abutilon indicum</i>	Monkeybush
49. Mumutung palao'an bushmint	<i>Hyptis pectinata</i>	Comb
50. Nanason gaifigo'	<i>Scaevola sericae (taccada)</i>	Half flower
51. Tupun ayuyu	<i>Elastostema calcareum</i>	Elastostema
52. Nonnak	<i>Hernandia Sonora</i>	Lantern tree
53. Nunu	<i>Ficus prolixa</i>	Pacific banyan
54. Pakao	<i>Caesalpinia major</i>	Hawaii pearls
55. Panao gardenia	<i>Guettarda speciosa</i>	Beach
56. Pao de'do'	<i>Hedyotis foetida var. mariannensis</i>	Hedyotis
57. Pao de'do' lahi	<i>Hedyotis sp.</i>	Hedyotis
58. Papayan lahi	<i>Carica papaya</i>	Male papaya
59. Pago	<i>Hibiscus tiliaceus</i>	Hibiscus tree
60. Petchalan	<i>Deeringia amarantoides</i>	None
61. Piga'	<i>Alocasia indica</i>	Giant taro
62. Potpupot	<i>Peperomia mariannensis</i>	None
63. Pugu'a' matchena	<i>Davallia solida</i>	Solida fern
64. Pupulun aniti	<i>Piper guamensis</i>	Wild pepper

65. Puting	<i>Barringtonia asiatica</i>	Fish Kill tree
66. Sanye'ye'	<i>Taeniophyllum mariannense</i>	Worm orchid
67. Sensen hale' hanom orchid	<i>Nervilia sp.</i>	Water-root
68. Sibukao	<i>Caesalpinia sappan</i>	Brazilwood
69. Sumak	<i>Aidia cochinchinensis</i>	None
70. Take'biha	<i>Senna alata (Cassia alata)</i>	Candlebush
71. Titimu	<i>Eclipta prostrata</i>	False daisy
72. Tronkon donne' Sali	<i>Capsicum annum</i>	Hot pepper
73. Tuba Tuba	<i>Jatropha curcas</i>	Physic-nut
74. Tumates cha'ka	<i>Physalis minima</i>	Sunberry
75. Yetbas Santa Maria	<i>Artemisia vulgaris</i>	Mugwort
76. Yetbas babue	<i>Blechnum brownie fo. Puberulum</i>	Blackweed

References:

1. Borja, Manuel Flores and Roppul, Jose Somorang. (2009). *Directory of Traditional Healers and Medicinal Plants in the Commonwealth of the Northern Mariana Islands: Inetnon Amot Natibu, Saipan.*
2. Moore, Philip H. and McMakin, Patrick D. (1979). *Plants of Guam.* Cooperative Extension Service, University of Guam.
3. Moore, Philip H. and Krizman, Richard D. (1981). *Field and Garden Plants of Guam.* Cooperative Extension Service, University of Guam.
4. Raulerson, Lynn and Rinehart, Agnes F. (1992). *Ferns and Orchids of the Mariana Islands.* Lynn Raulerson and Agnes Rinehart, Guam.