

2020 CNMI 305(b) and 303(d) INTEGRATED WATER QUALITY ASSESSMENT REPORT – RESPONSE TO PUBLIC COMMENTS

SUMMARY OF PUBLIC PARTICIPATION

The draft 2020 CNMI IR was posted to request for Public Comments on DEQ’s website and on the cnmi.waterquality@gmail.com email list serve on September 8th, 2020. In addition, Press Releases requesting for public comment were published in both local newspapers on September 11th, 2020 (Please refer to Appendix IV of the Final IR to view public notice documentation). To increase accessibility to relevant information, the WQS/NPS Branch also produced a Fact Sheet and a standalone version of the CWA 303(d) Impaired Waters List for posting on DEQ’s website along with the Integrated Report.

The last date for public comment submission was October 16th, 2020. BECQ received several substantive comments from government agencies, which improved this IR’s content, and a letter of support from the CNMI Office of Planning and Development (see summary that follows).

SUMMARY OF PUBLIC COMMENTS AND BECQ RESPONSES

Comment #1 – CNMI Bureau of Environmental and Coastal Quality – Division of Coastal Resources Management – Planning Section

2020 IR Comments
Mary Fem Urena
To: cnmi.waterquality@gmail.com
Attachments:  2020 IR Comments - DCRM Planning.pdf
Sent: 10/16/2020 2:19 PM

Hafa Adai,

Attached are DCRM Planning's comments for the 2020 Integrated Water Quality Report.

With gratitude,

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Mary Fem Urena
Coastal Resource Planner I
[Bureau of Environmental and Coastal Quality](#)
[Division of Coastal Resources Management](#)
Phone: (670) 664-8308

Interested in our work on shoreline monitoring? Click [here](#).

Comments provided by Division of Coastal Resource Management (DCRM) Planning.

Thank you, Ms. Urena, for DCRM comments on the 2020 CNMI IR. Please find our Responses in Blue Font below.

Table B-1: Surface Waters Assigned to Reporting Categories.

- CNMI Population is an unrelated topic under this title, is this an appropriate place for it to be placed?
 - **Response:** The Table B-1, as comprised showing CNMI Population, is requested for inclusion in this particular section of the report by EPA in their 2006 IR Guidance Document (<https://www.epa.gov/sites/production/files/2015-10/documents/2006irg-report.pdf>).

B.3.2. Benefits:

- It may be helpful for the reader to identify which watersheds consisted of the 15.8 CNMI coastal miles removed from the impaired list.
 - **Response:** So noted. The following was added to the referenced section B.3.2, “This included Rota’s Sabana/Talakhaya/Palie, Uyulanhulo/Teteto, and Chaliat/Talo watersheds that now meet WQS for phosphate, and Saipan’s Susupe North watershed that now meets the WQS for Enterococci.”

B.4.2. Failing Septic Systems, and Illicit, and Permitted Wastewater Discharges:

- Are there efforts to monitor or address residential septic systems?
 - **Response:** Section B.2.3 describes the BECQ Wastewater, Earthmoving and Erosion Control Program that oversees the design and permitting of IWDS (residential septic systems). In addition, WEEC staff conduct household surveys on a village by village basis to identify IWDS that require upgrades or are in need of a pump out in order to properly collect and treat wastewater. In addition, CUC has regulations that require for households to hookup to existing sewer lines where available. This information was added to the referenced section.
- May be helpful to include SOCs and VOCs into the acronym list
 - **Response:** Synthetic Organic Compounds and Volatile Organic Compounds were added to the Acronym List.

B.4.5. Climate Related Severe Storm Event Impacts:

- What are water quality findings from the impacts of these severe storm events?
 - **Response:** The effects of climate change related disturbances on aquatic life and associated habitats are discussed at length in section B.4.5. To clarify, damage to coral reefs from storm action, sediment loading, and increased ocean temperatures resulting in coral bleaching, were used to determine whether the *Support and Propagation of Aquatic Life* Designated Use was attained as part of the IR assessment of water quality. Indeed, many of the watershed’s surrounding coastal waters were adversely impacted this reporting cycle from typhoons. Benavente, et.al. stated in the 2019 MMT report, that Super Typhoon Yutu, “... further affected near-shore marine habitats within the CNMI.”, and, “Storm surge pummeled reefs and pulled storm debris (trees, shipping containers, and roofing tin) into the water and scraped, smashed or upturned coral colonies. The effects of these events naturally vary between each type of reef; however, general trends suggest that reef health has declined for most sites as a result of such disturbances.” (2019. Benavente, et.al.).
 - The report also found a general decline in coral cover at long-term monitoring sites related to climate related disturbances. However, BECQ lacks sufficient water quality data at these long-term monitoring sites to confirm whether or not there are water quality pollutant sources contributing to this decline in coral health.

C.2.1. Waterbody Segmentation - Watershed Approach:

- DCRM is expecting a new digital elevation model from the incoming LiDAR expected to arrive by the end of this year.
 - **Response:** Yes, WQS/NPS staff requested that the NOAA CZM coordinator request that this new LiDAR data be collected during one of our collaborative Watershed Working Group discussions. This will allow BECQ to differentiate watersheds throughout the archipelago and to create detailed maps of watersheds and streams documenting survey data. We are very happy to note that NOAA plans to provide this new data in time for the next reporting cycle.

C.4. WETLANDS PROGRAM

- DCRM continues to have wetlands as a CZMA Section 309 priority. The strategy developed for the 2021-2025 cycle is to update the Wetlands APC boundaries by an updated wetland field assessment using delineation methodology based on the adopted Rapid Assessment Methodology (RAM) and the Stream Visual Assessment Protocol (SVAP).
 - **Response:** We look forward to using DCRM’s updated Wetlands APC boundaries as they become available for mapping and assessments in upcoming IRs. We also

look forward to providing to DCRM the data gathered during the Stream Visual Assessments conducted by the WQS/NPS Branch.

Comment #2 – CNMI Office of Planning and Development

Comment on 2020 CNMI Draft Integrated Water Quality Assessment Report

Erin Derrington

To: cnmi.waterquality@gmail.com

CC: Ek Cabrera; Jonathan L. Amisaj A. Kodep Ogumoro-Ufudong

Attachments:  2020_10_15_DEQ_WQcomment.pdf

Sent: 10/15/2020 6:08 PM

Good evening,

Please find a comment from OPD regarding the 2020 CNMI Draft Integrated Water Quality Assessment Report. Thank you for this opportunity to provide feedback.

Best wishes,

Erin

~

Erin M. Derrington

Lead Planner

CNMI Office of Planning and Development

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A. KODEP OGUMORO-ULUDONG
DIRECTOR

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October 16, 2020

Eli D. Cabrera
Administrator, Bureau of Environmental and Coastal Quality
Gualo Rai Center, P.O. Box 501304
Saipan, MP 96950
Sent via email to cnmi.waterquality@gmail.com

Re: 2020 CNMI Draft Integrated Water Quality Assessment Report

Dear Administrator Cabrera,

This letter is to provide a comment from the Office of Planning and Development (OPD) on the 2020 CNMI Draft Integrated Water Quality Assessment Report (IWQAR). OPD relied heavily on the 2018 IWQAR for discussion of land management and water quality trends in the development of the 2019 Resources Report, and I would like to commend you and your team for the impressive data collection and analysis that continues to inform these biennial publications. Overall, this comprehensive water quality report provides incredibly valuable information to support long-term planning discussions that are also supported through your ongoing partnership and participation in our Planning and Development Advisory Council, and OPD is grateful to you and your staff for your support.

The content of this 2020 IWQAR continues the valuable trend data BECQ's Division of Environmental Quality (DEQ) has been compiling through these reports for decades. The separation of the Northern Islands into a separate section in this update is especially informative and helpful for long-term planning purposes. Supporting clean water and sanitation management practices to ensure a healthy environment on land and in our waters is a sustainable development vision that is reflected in the draft Comprehensive Sustainable Development Plan (see Goals 6, 14, and 15 and supporting objectives and action items). While the 2020 IWQAR identifies numerous challenges in the 303(d) list of impaired waters, the new data it highlights will support targeted resource management planning that can support delisting of impaired waters, reflecting the achievement of our shared sustainability goals to ensure wise use and resource stewardship. It is the data, the total maximum daily loads, and the water quality standards that BECQ-DEQ establishes through this IWQAR that will help us make these sustainability visions and objectives a reality.

Thank you for your time, consideration and ongoing support.

Sincerely,

A. Kodep Ogumoro-Uludong
Director, Office of Planning and Development

CC: Jonathan Arriola, DEQ Director

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Thank you, Mr. Ogumoro-Ulundong for your letter of support for the 2020 CNMI IR. BECQ is grateful for OPD's important collaborative partnership in implementing Sustainable Development for water quality improvement.

Comment #3 – CNMI Bureau of Environmental and Coastal Quality – Division of Coastal Resources Management – Watershed Coordinator

Water Quality Report comment

Zachary Williams

To: cnmi.waterquality@gmail.com

Sent: 10/16/2020 1:31 PM

I wanted to address this statement in the report (and reiterated for various specific streams):

"Likewise, there has been no systematic survey to measure visitor or residents' Aesthetic Enjoyment of streams. However, many residents and visiting tri-athletes hike within Saipan's streambeds for training, athletic competitions, or general recreation in the tradition of the "Hash House Harriers". Since 1984, Saipan residents have set a "Hash" trail every Saturday, for a noncompetitive hiking/running event. Trails are made through various pristine forested areas so "hashers" may enjoy the beauty of these remote locations. Tourists and visiting tri-athletes have also been known to take part in the "Hash". Based solely on this anecdotal evidence, the Aesthetic Enjoyment DU is supported for all of Saipan's streams except for the concrete conveyances within the Central West Takpochau watershed."

While outdoor recreation should be supported, I do think it is worth mentioning the impacts this can have, particularly the sorts of short term trails through "pristine" forest as are described above. Many of these trails — from my experience (e.g. in upper W. Takpochau) — are partially or almost entirely within a stream bed, and quite possibly contribute to erosion and sedimentation. Additionally, many of these facilitate littering through creation of access to pristine areas, or even leaving plastic trail flagging laid out during trail clearing.

Likewise "offroad" vehicles have eroded large areas in the upper watershed areas (e.g. Wireless Ridge), contributing to erosion and sedimentation.

Point being, while they are all worth noting as support for "Recreational & Aesthetic Enjoyment", they are also worth noting under "Special State Concerns and Recommendations", particularly B.4.1 "Erosion and Sedimentation". For example, creating and maintaining more "sanctioned" trails that take riparian buffers into consideration.

Thank you!

Zachary B. Williams

Watershed Coordinator, Division of Coastal Resources Management (DCRM)

CNMI Bureau of Environmental and Coastal Quality (BECQ)

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To learn more about local watershed projects, please visit the [Watershed Working Group \(WWG\)](#) page.

Thank you Mr. Williams, for your comment. WQS/NPS **Response** in Blue font follows:

Response: So noted. BECQ has included the following in Section B.4.1., “Erosion of, and sedimentation from, improperly designed secondary coral roads, off-road vehicle recreational activities, and short-term hiking trails cut through vegetation or through streambeds, are all of special concern as these can contribute to sediment loading to surrounding waters, turbidity and other NPS pollution. While hiking trails, and off-road recreational vehicles provide support for the *Aesthetic Enjoyment* DU, every effort should be made on the part of CNMI regulatory agencies to oversee creating, maintaining, and permitting more “sanctioned” trails and off-road areas that can support these activities, while protecting riparian buffer zones and other Areas of Particular Concern (APC) from harm, and preventing erosion and sediment from loading into surrounding waters.”