



Commonwealth of the Northern Mariana Islands
OFFICE OF THE GOVERNOR

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November 25, 2015

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ATTN: PACAF Divert Marianas EIS

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Dear Department of Defense:

The Commonwealth of the Northern Mariana Island's (CNMI) Bureau of Environmental and Coastal Quality (BECQ) has reviewed the Revised Draft Environmental Impact Statement (DEIS) for Divert Activities and Exercises.

BECQ is composed of:

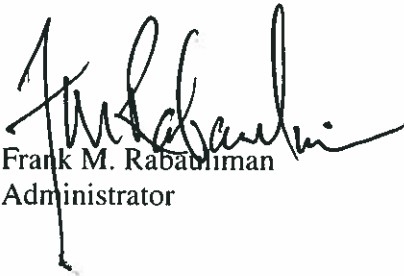
Department of Environmental Quality (DEQ) mandated to administer programs and mitigate contamination related to water quality, air quality, hazardous materials, earthmoving and erosion in the CNMI (PL 3-23);

Division of Coastal Resources Management (DCRM) mandated to regulate activities impacting coastal resources of the CNMI by providing interagency collaboration, permitting and enforcement, monitoring, outreach and education, and restoration (PL 3-47).

As outlined in the attached comments, if the Divert Activities and Exercises go forward, BECQ's preferred alternative is Alternative 2 – Modified Tinian Alternative. BECQ encourages PACAF to continue working with all of the CNMI environmental agencies to ensure military projects are conducted with minimal impact to the environment.

BECQ is available to work with the Department of Defense to inform and improve the Divert Activities and Exercises. Please contact us with any questions.

Sincerely,



Frank M. Rabauliman
Administrator

**BUREAU OF ENVIRONMENTAL AND COASTAL QUALITY
DIVISION OF ENVIRONMENTAL QUALITY
DIVISION OF COASTAL RESOURCES MANAGEMENT**

**Comments on the Revised Draft
Environmental Impact Statement for
Divert Activities and Exercises,
Commonwealth of the Northern Mariana Islands**

November 2015

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Preferred Alternative

If the Divert Activities and Exercises (henceforth ‘Divert Activities’) move forward, BECQ’s Preferred Alternative is “Alternative 2 – Modified Tinian Alternative”. As outlined in the sections below, BECQ is of the opinion that the Divert Activities would have fewer impacts on Tinian than in Saipan.

BECQ advises against placing the Divert Activities on Saipan for the following reasons:

- More people would likely be affected by construction and aircraft noise
- Noise could affect tourism and recreation at Coral Ocean Point and southern beaches
- Impacts to the nightingale reed-warbler and black noddy rookery near the airport
- Impacts to the Aslito/Isley Field NHL

The Divert Activities would have many similar impacts whether placed on Saipan or Tinian. BECQ outlines its concerns in the comments below. If the Divert Activities move forward, the United States Air Force (USAF) should propose further mitigation to offset effects to noise receptors, air quality, terrestrial resources, and socioeconomic impacts.

Noise

BECQ is very concerned that increased noise could have a detrimental impact to the people and wildlife on Saipan and Tinian. More information on the baseline noise levels and number of people likely to be affected by the Divert Activities should be included in the FEIS.

For example, the Noise chapter of the DEIS notes the increase in *acres* that will be affected by the Divert Activities but not the increase in *people* to be affected. Later in the DEIS, it is noted that “a population of less than 12 would be exposed to the 65 dBA noise level on Saipan.” (p.4-97). The DEIS also later notes that, “a noise level of 67–71 dBA could be intermittently heard at the border of the village of Dandan” (4-172). The Noise chapter should clearly lay out how many people will be affected by how much noise, how often, and where.

Information on the number of acres and people affected should also be given for the Average Busy Day (ABD), currently only acres affected for the Average Annual Day (AAD) is noted. This information would be especially useful for Tinian as the ABD contours are much larger and overlap shorelines. There would likely be more ‘noise receptors’ on Tinian under the ABD.

The DEIS uses 65-70 dB contour lines on its noise maps. This is likely under the assumption that 12-22% of people would be ‘highly annoyed’ within the 65-70 dBA contour (p. 4-1) as described by Finegold et al (1994). However, as noted earlier in the DEIS, a ‘Residential area in a small town or quiet suburban area’ typically experiences levels of 50 dBA. BECQ suggests using 50dBA as its baseline for comparisons. Residents and visitors to Saipan and Tinian put a

premium on peace and quiet in the area. Loud noises will likely cause a higher rate of annoyance on the islands. The American National Standards Institute (ANSI) notes that Finegold et al set a standard in 1994 and this standard remains relevant today. However there are now qualifications to the dose-response function set by Finegold et al. For example:

- “In newly created situations, especially when the community is not familiar with the sound source in question, higher community annoyance can be expected. This difference may be equivalent to up to 5 dB.
- Research has shown that there is a greater expectation for and value placed on "peace and quiet" in quiet rural settings. In quiet rural areas, this greater expectation for "peace and quiet" may be equivalent to up to 10 dB.
- The above two factors are additive. A new, unfamiliar sound source sited in a quiet rural area can engender much greater annoyance levels than are normally estimated by relations like equation (F.1). This increase in annoyance may be equivalent to adding up to 15 dB to the measured or predicted levels.” (ANSI 2005)

BECQ recommends PACAF use the updated ANSI qualifications in its analysis for Saipan and Tinian. Illustrating the change in the 50dBA contour line from the current baseline to the Divert Activities’ AAD and ABD would be informative.

BECQ also recommends using Best Available Technology to reduce noise impacts. This should include regular maintenance, on-the-ground monitoring, and reporting of noise (ambient and peak) to BECQ when requested.

Given that Saipan is a more populated island and the noise effects would be greater on Saipan, BECQ recommends Tinian as the preferred alternative.

Table 1: Comparison of Noise Effects Between Three Alternatives

	Saipan	Tinian	Hybrid
closest residences to the construction sites	700 ft from airport 300 ft from Port	5,200 ft from airport 700 ft from Port	Noise would be “less frequent”
increase in acres within the 65 to 80+ dBA DNL noise contours	21 acres	18 acres	S – 21 acres T – 18 acres

S: Saipan, T: Tinian

Air Quality

BECQ is concerned that the Divert Activities will have a negative impact on the CNMI’s air quality. As noted in the DEIS, “PACAF will coordinate with CNMI DEQ to obtain the necessary stationary source permits prior to commencing construction of any potential stationary source, to include the bulk fuel storage areas” (pp. 4-20, 4-28, 4-36). BECQ looks forward to working with

PACAF to ensure stationary sources of air emissions comply with CNMI regulations. BECQ also encourages efforts be taken to reduce emissions of air pollutants wherever possible, including non-stationary sources during the implementation phase.

The DEIS states that “significance criteria thresholds are not expected to be reached for either phase [Construction or Implementation]” for all Alternatives (pp. 4-27, 4-34, 4-42). However, CO² emissions in the Implementation Phase “would reach the threshold of 25,000 metric tonnes described in guidance issued by the EPA...EPA guidance does not propose this as an indicator of a threshold of significant effects.” (pp. 4-27, 4-34, 4-42). The proposed CO² emissions of 166,305 metric tonnes per year greatly exceed the EPA’s reporting threshold. Further, these emissions would be concentrated to a span of 8 weeks rather than spread out over a year. BECQ recommends monitoring of air quality and health impacts over the course of operations.

BECQ would also like to see more information on how emissions estimates were calculated. Currently, Appendix E does not provide sufficient details. Several acronyms, reports, and models are cited in this section but not explained or referenced further. Particularly confusing is the calculation of PM₁₀ and PM_{2.5}. On page E-3 the “Total Project Annual Emission Rates” are listed as 0.44 tons for PM₁₀ and 0.43 tons for PM_{2.5}, while on page E-4 the project emissions are listed as 48.52 tons PM₁₀ controlled and 3.88PM_{2.5} controlled. More explanation on how the numbers on page E-3 relate to those on page E-4 would be appreciated. It also appears that 1996 data was used for construction activities modeling PM₁₀ (p. E-4) – is this the latest modeling data available? Moreover, the EPA’s National Emissions Inventory documentation was applied for PM in nonattainment areas. Modeling documentation that reflects the fact that this area is considered an “in-attainment” zone should be used to ensure there is no degradation of existing air quality.

Further, on page E-6 there is a calculation for “Construction/Staff Commuter Emissions”. It is assumed that 1500 staff will travel 40 miles daily on Saipan under Alternative 1. However in the DEIS it states that “It is estimated that the number of construction workers associated with Alternative 1 would not exceed 500 at any given time.” (p.4-108). The Appendix assumes 2000 people and 40 miles daily travel for Tinian under Alternative 2, but the DEIS states that the construction workers under Alternative 2 “would not exceed 750 at any given time” (p.4-111) for the North Option and “would not exceed 500” (p.4-113) under the South Option. The FEIS should explain why an alternate number was used in the Appendix. Also, the DEIS notes that workers could come from Guam or the Federated States of Micronesia, or be transported from Tinian or Rota (p.4-170). The commute from other islands should be included in calculations, especially if workers would be commuting daily from Tinian or Rota to Saipan. Construction emissions should be adjusted to include emissions from anticipated travel for each proposed action.

BECQ is concerned that air emissions are averaged over a year rather than over the 8 weeks of operations. Emissions from operations should be averaged over 8 weeks to show the localized increases over that time frame.

BECQ recommends PACAF use Best Available Technology to reduce air quality impacts, including requirements for high MPG vehicles, regular maintenance, installation of buffers and HEPA filters, and on-the-ground monitoring and reporting of air quality to BECQ when requested (w/in 24hrs of request). Implement idling restrictions for operating vehicles, especially large equipment (during construction) and fuel vehicles (during implementation).

Airspace and Airfield Environment

BECQ defers to the Commonwealth Port Authority for comments on the Airspace and Airfield Environment. BECQ would appreciate more information on the following claim: “beneficial impacts would be expected because the fueling system would provide a more efficient fueling operation.” (p.4-45). Are there any restrictions to commercial airlines using military fuel tanks? To what extent could commercial planes use the military fuel tanks?

Geological Resources and Soils

As noted in the DEIS, the Divert Activities could lead to excessive erosion and compaction of soils during the construction phase and “compaction of soil, degradation in soil productivity, alteration of storm water drainage and the percolation of rainwater” (p. 4-53) during the implementation phase. The DEIS proposes to handle these impacts largely through BMPs. The DEIS does state that: “All construction BMPs would follow the guidelines provided in Federal and CNMI permitting processes and regulations; a USEPA Construction General Permit and a CNMI DEQ Noncommercial Earthmoving permit might need to be submitted prior to the start of any construction activities under Alternative 1.” (p. 4-53) BECQ is concerned by the inclusion of the word ‘might’ and encourages PACAF to apply for a Noncommercial Earthmoving permit to improve communication between the CNMI and DoD, and to ensure all environmental impacts are avoided or minimized. Stormwater management facilities that will address frequent heavy rain events must be installed.

Table 2: Comparison of New Impervious Surfaces Between Three Alternatives

	Saipan	Tinian	Hybrid
new impervious surfaces/ construction footprint	1,245,382 ft ²	TN: 4,483,194 ft ² TS: 2,832,615 ft ²	S: 388,557 ft ² TN: 3,569,972 ft ² TS: 1,935,772 ft ²

S: Saipan, TN: Tinian North, TS: Tinian South

Water Resources

Surface Water

According to the DEIS, “Impacts on surface water could result from a reduction in water quality, increased storm water runoff, and altered hydrologic conditions.” (p. 4-56) Under Alternative 2 North and South Option “impacts on surface water resources would be similar to, but greater than, Alternative 1 due to the larger construction footprint” (pp. 4-59, 4-60). Impacts would largely be dealt with by implementing sediment and erosion controls and storm water management BMPs. The DEIS says construction BMPs would follow CNMI DEQ Earthmoving and Erosion Control Regulations and permit, and the CNMI DEQ/GEPA Stormwater Management Manual. We look forward to working with USAF on their permit.

Storm Water

According to the DEIS, “a temporary increase in storm water runoff, erosion, and sedimentation would be expected during the proposed construction activities.” (p. 4-57) On Saipan, this increase will be dealt with by developing a Storm Water Pollution Prevention Plan (SWPPP). Further, the DEIS says “Storm water management and infiltration features should be designed in accordance with the CNMI DEQ/GEPA Stormwater Management Manual” (4-57). BECQ looks forward to working with USAF on the development of their stormwater management plan.

In the DEIS, storm water for Alternative 2 is handled under the ‘Surface Water’ heading. The DEIS notes that predevelopment site hydrology will be maintained to the maximum extent technically feasible. According to the DEIS, “This would likely require the existing storm water management features at Tinian International Airport to be resized or supplemented to accommodate the increase in storm water runoff from the improved areas.” (4-60). BECQ offers its expertise to USAF to ensure water quality is maintained.

Groundwater

BECQ is very concerned that the Divert Activities could negatively impact groundwater on Saipan or Tinian. According to the DEIS,

- “Under Alternative 1, replacement of pervious surfaces with impervious surfaces could result in depletion of groundwater resources and increased salt water intrusion to drinking water wells.” (4-58)
- “Due to the high permeability of the limestone on Saipan, the Mariana Limestone Aquifer could be very susceptible to contamination.” (4-58)
- Under Alternative 2, “the underlying aquifer could be very susceptible to contamination. Therefore, storm water directed from these areas could require substantial pre-treatment and filtering prior to infiltration to protect the quality of groundwater resources.” (4-60, 4-61)

Any contamination to the groundwater lens would be considered more than a “moderate” impact. If the Divert Activities move forward, USAF should take all steps possible to reduce the threat of

groundwater or surface water contamination. The DEIS does note that, “One of the key BMPs required under the SPCC is the use of secondary containment systems to contain spills and leaks. “ (p. 4-58) BECQ recommends installing monitoring wells and ensuring BMPs are in place to report and contain any fuel leaks or spills. Leaks or spills must be reported to BECQ’s DEQ, and the monitoring and reporting plan should be shared with the agency to ensure compliance with local and national requirements.

BECQ looks forward to working with USAF in addressing these impacts under the DEQ Earthmoving Permit. BECQ recommends installing monitoring wells and ensuring staff are trained in spill prevention and clean-up to reduce threats of negative impacts to water resources.

Terrestrial Biological Resource

The primary impacts appear to be the possible introduction of the brown treesnake, the removal of habitat for construction, and noise impacts during operations.

The DEIS notes that six species were proposed for listing as endangered in October 2014, however, “None of those species would occur in the mowed field, tangantangan forest, park, disturbed or paved areas, or agricultural vegetation communities found at and surrounding Saipan International Airport” (p.4-68) It is unclear how USAF came to this conclusion. Were surveys conducted for these species? What is known about the habitat of these species? The FEIS should include specifics on why these newly listed endangered species would not be affected.

BECQ is particularly concerned about possible effects to the nightingale reed-warblers surrounding the Saipan International Airport. As the DEIS notes, “the USAF has concluded that this alternative [Alternative 1] is likely to adversely affect nightingale reed-warblers” (p. 4-68) In addition to the mitigation measures currently proposed, BECQ recommends only clearing in Saipan outside the main nesting season for reed-warblers and conducting surveys prior to clearing to ensure no birds are present or have moved since the last survey.

In the previous DEIS, USAF offered to purchase a credit in the Saipan Upland Mitigation Bank prior to any construction of the east parking apron. The east parking apron is no longer proposed for the revised DEIS. Will USAF consider purchasing a credit in the Saipan Upland Mitigation Bank prior to other construction surrounding Saipan International Airport? Although reed-warblers were not detected in the 2012 surveys in the areas for the proposed fuel tanks, maintenance facility, hydrant system and cargo pad, birds do move around. Reed-warbler territories were detected “partially within or adjacent to the proposed location of the fuel tanks.” (p. 4-68) As territories do move, BECQ recommends surveying the area prior to clearing and purchase of a credit in the Saipan Upland Mitigation Bank.

Chapter 3.6 notes that “biologists located a black noddy (*Anous minutus*) rookery at Saipan International Airport” (p. 3-49), however this rookery is not addressed in Chapter 4.6. The black noddy is listed in the Migratory Bird Treaty Act (MBTA) and should be addressed.

Under Alternative 2, the Tinian Monarch could be affected by Divert Activities. As the DEIS notes, “Although this bird species was federally delisted in 2004 (69 FR 56367), and delisted by the CNMI government in 2009, this endemic species could be threatened by habitat loss.” (p. 4-72) There appear to be no mitigation measures proposed for the protection of the Tinian Monarch. Activities should ensure any habitat is disturbed to the least extent possible.

BECQ is also concerned about the possibility of airstrikes to migratory birds. The DEIS notes that this is a possibility (pp. 4-69, 4-73, 4-76). BECQ recommends that airstrikes be reported to DFW for improved communication, monitoring, and response.

Marine Biological Resources

The DEIS states that: “No construction would occur in the marine waters surrounding Saipan. As such, no impacts on marine biological resources would occur under the Construction Phase of Alternative 1.” (p.4-78) The same is stated for Tinian (p. 4-80).

Although there is no in-water construction proposed for this project, run off from construction on land could have impacts in marine waters. The DEIS previously addresses having erosion and stormwater controls. Such controls must be implemented and monitored to protect marine resources.

The DEIS further mentions that “military aircraft would also conduct training over the ocean within the MIRC. ... These training exercises are covered under the Programmatic Biological Opinion on military readiness activities the U.S. Navy proposes to conduct within the MIRC and the MITT” (p. 4-79). Multiple Department of Defense projects are occurring or proposed for the CNMI (MIRC, MITT, CJMT, Guam Relocation, Divert Activities, etc). It is very confusing how these various projects connect and overlap. A clear description of *all* Department of Defense activities and how they overlap would be appreciated.

This section of the DEIS repeatedly says the “U.S. Navy proposes to conduct within the MIRC and the MITT from August 2015 to August 2015” (pp. 4-78, 4-80, 4-81, 4-82) Are these dates correct?

Cultural Resources

BECQ defers to the Historic Preservation Office (HPO) for comments on Cultural Resources. As the DEIS notes, Alternative 1 would be near Aslito/Isley Field NHL and could “alter the viewshed of nearby historic structures. Such visual intrusions could impact integrity of, setting

and feeling of those historic structures and the NHLD as a whole” (4-86). Meanwhile, the “construction at Tinian International Airport under the Alternative 2 North and South Options could impact one archaeological site, TN-6-0030 (also sometimes referred to as Site 3005), the American administration-period West Field” (p. 4-86)

The DEIS goes on to say that “The Implementation Phase of Alternative 2 would have no impact on cultural resources”. (p.4-87) BECQ suggests that Tinian is a small island, all of which is culturally important to the people that have called it home for centuries. Increased military air traffic could also represent a visual intrusion to an island that values peace and tranquility.

Recreation

According to the DEIS, the main effects to recreation include increased travel times due to the number of vehicles on the road during the construction phase, and noise, traffic, and decreased lodging for tourists during the implementation phase.

For Alternative 1, the DEIS notes that “Military exercises would generally be conducted on land designed for that purpose, and previous military exercises throughout the region have not precluded fishing or recreational use, even during peak fishing season.” (p. 4-91) This is a misleading sentence as the land (current airport) has *not* been designed for military exercises but would be modified for the Divert Activities should they go forward. Further, while previous military exercises may not have precluded recreational use, they may have and could affect the quality of recreational use.

The DEIS notes that the “noise levels at Coral Ocean Point Golf Course and Ladder Beach would increase to 60–64 and 55–59 dBA DNL, respectively” (p. 4-91). As noted in the Noise chapter of these comments, a 50dBA baseline should be used for comparisons given the quiet nature of the CNMI and preference for tranquility at tourist resorts.

The DEIS states that “Fewer recreational resources are found in the immediate vicinity of Tinian International Airport” (p.4-92) and thus impacts from construction and implementation would be negligible. No mention is made of the planned Plumeria Resort by the Alter City Group and how the Divert Activities could affect future tourism on the island. The FEIS should note potential affects to the Plumeria Resort and to future tourism in general.

Land Use

The DEIS notes that “it is assumed that a population of less than 12 would be exposed to the 65 dBA noise level on Saipan” (p.4-97) and “There are no schools that would be exposed to noise levels at or above 65 dBA DNL and, therefore, no impacts on children’s health or learning would be expected. “(p. 4-99) BECQ recommends in its Noise comments above that a lower threshold be used given the CNMI’s tranquil nature. Fortunately, Table 4.10-1 “Alternative 1 Noise Levels at

Noise-Sensitive Locations around Saipan” puts nearby schools at below the 50dBA level. Noise mitigation would still be appreciated to maintain tranquility around Coral Ocean Point and Ladder Beach.

In its “Climate Change” section, the DEIS states that: “coastal flooding due to sea level rise could have an adverse impact on proposed fuel tanks located near the seaports of Saipan and Tinian. If a rise were to occur suddenly, fuel tanks could become inundated, and this could lead to a release of fuel into the environment” (p.5-43). USAF should work with BECQ, CPA, and other agencies to ensure that storm surge and sea level rise models are considered when planning locations of facilities in order to minimize risks and ensure long-term sustainability.

Under Alternative 2, the DEIS says: “While the CPA owns some north of Tinian International Airport on which construction would occur, additional acres of LBA land would be required. This LBA land is currently used for cattle grazing, and agriculture/grazing leases and permits might need to be terminated. This permit revocation and the displacement of ranches would create an economic hardship on the affected ranchers” (pp. 4-177 – 4-178). This is of particular concern as the CJMT has also proposed moving ranchers. Is there enough space for all the displaced ranchers? Where will they be moved to? What is the quality of the new grazing land?

Transportation

Impacts to traffic from construction and implementation should be avoided. BECQ suggests USAF work with the Department of Public Works to conduct traffic surveys to identify problem intersections and address congestion. This will have the added benefit of reducing associated emissions from unnecessary idling. Wherever possible USAF should coordinate transportation of personnel to non-“high use / rush hour” periods.

Hazardous Materials and Wastes

The DEIS notes that “additional hazardous wastes would not be expected to exceed the capacities of existing hazardous waste disposal streams” (pp. 4-124, 4-129); however, these streams are not identified in the DEIS. The FEIS should identify what hazardous waste disposal streams the USAF intends to use. If necessary, USAF should work with BECQ-DEQ, Tinian’s Mayor’s Office, and Department of Public Works to determine if hazardous wastes can be stored at the Tinian Transfer Station or if the military needs to construct its own hazardous waste management facility.

In regards to the storage of petroleum products, the DEIS says: “Contractors would obtain an AST Permit to Install and an AST Permit to Operate from the CNMI DEQ for all ASTs needed to support construction.” (4-124) BECQ-DEQ is prepared to work with USAF and its contractors should the Divert Activities move forward.

Infrastructure and Utilities

The DEIS states that there could be negative impacts to fuel supplies, electrical systems, communications systems, and sewer systems. Negative impacts should be avoided and interruptions should be coordinated with CPA and CUC. Examples of impacts include:

- Any buried utility lines on the site [Saipan and Tinian Ports] of the proposed fuel tanks would have to be permanently relocated. (pp. 4-142, 4-148, 4-151)
- ...extension of electrical lines to and the relocation or upgrading of any buried electrical lines.... These short-term impacts could include potential power disruptions when new facilities and lighting systems are connected to the power grid (pp. 4-142, 4-147, 4-151)
- temporary shutoff of sewer lines during the connection of a 6-inch sewer line from the proposed maintenance facility to the sewer main line. (pp.4-143, 4-149)
- Short-term, direct, negligible, adverse impacts on the communications system would occur as the permanent facilities at Saipan International Airport are connected to the existing telephone line system at the airport (p.4-145)

BECQ is particularly concerned about the disposal of construction waste. Currently the DEIS proposes to dispose of un-recyclable waste at the Marpi Landfill under Alternatives 1 and 3, or to ship waste off island under Alternatives 2 and 3. It is unclear where waste would actually be shipped to under Alternatives 2 and 3. The FEIS should have a clear plan and state where construction debris will be shipped off to. Further, the islands are small with limited space. Filling the Marpi landfill with an “estimated 1,025 tons over a period of approximately 3 years” (4-145) is more than a minor impact. More information on how USAF plans to reduce and recycle waste would be appreciated.

This chapter contains a section on storm water, noting “An SWPPP approved by the DEQ would be required and must contain an NPDES permit declaration.” (p.4-144) This chapter also notes that septic systems will be used for personnel on Tinian under Alternative 2. The DEIS states: “One or more septic systems would need to be constructed to handle up to 265 personnel for Alternative 2 North Option. An Individual Wastewater Disposal System Permit Application from CNMI DEQ would be obtained for each septic system.” (4-149) The same would be done for the Alternative 2 South Option.

BECQ-DEQ is prepared to work with USAF on its SWPPP and Individual Wastewater Disposal System Permit Application should the Divert Activities go forward.

Socioeconomics and Environmental Justice

BECQ is concerned that the Divert Activities could have disproportionate impacts on minority and low-income populations. As the DEIS notes, “Approximately 98 percent of the population of Saipan is considered a minority, and approximately 53 percent of the population is low-income.” (4-172), and “Approximately 98 percent of the population of Tinian is considered a minority, and 44 percent of the population is low-income.” (p. 4-180)

BECQ is particularly concerned about noise effects. As the DEIS points out:

- Disproportionately high and adverse impacts could occur on minority and low income populations during implementation of Alternative 1 due to noise generation. (p. 4-175)
- Elevated noise levels could be experienced in the vicinity of the construction activities, but a noise level of 67–71 dBA could be intermittently heard at the border of the village of Dandan (p. 4-172)
- Noise from exercises could result in minor impacts on the island’s general tranquility and standard of living, but only in the areas that fall within the 65 dBA DNL contour and higher. (p. 4-175)

As pointed out in our Noise section above, the CNMI has a greater sensitivity to noise impacts. The ANSI standards should be used, taking into account the expectation for and value placed on "peace and quiet" in quiet rural settings. We recommend using a 50dBA contour and quantifying how many people will be impacted and how often, at that level for all Alternatives.

The DEIS states that 500 workers would be required for construction under Alternative 1 on Saipan and 750 under Alternative 2 on Tinian. Different numbers (1500 people on Saipan, 2000 on Tinian) are listed in Appendix E for construction/commuter emissions. This inconsistency should be addressed. As housing and employment are issues on Saipan and Tinian, USAF should work with the Mayors’ Offices and the CNMI Department of Commerce to ensure as many local workers are hired as possible.

On Tinian, “some construction would occur on land within the LBA, and require the termination of agriculture/grazing leases and permits in the LBA west and north of Tinian International Airport” (p. 4-179). The DEIS says that, “This impact could be minimized by providing the affected ranchers leases elsewhere in the LBA” (4-182). This is not mentioned in the “Mitigation Measures” chapter or in the “Cumulative and Other Effects” chapter. Given that the CJMT has also proposed terminating grazing leases, this issue should be given more attention by the DoD.

The DEIS also notes that Divert Activities could affect the provision of public services, measures should be taken to avoid negative impacts to the residents of Saipan and Tinian should the Divert Activities go forward.

Human Health and Safety

This chapter largely addresses construction hazards and the importance of fencing. Are there any environmental impacts that could lead to health hazards? The FEIS should note whether air pollution could affect residents – using data that is averaged over 8 weeks rather than a year. Air pollution impacts should also address the effects of increased levels of particulate pollution including ultrafine particles (UFP).

Mitigation Measures

Currently the “Mitigation Measures” chapter of the DEIS only lists measures for Terrestrial Biological Resources and notice that Cultural Resources will be handled under the Section 106 consultation process.

BECQ recommends USAF consider further mitigation measures to offset impacts to Saipan and Tinian residents should the Divert Activities go forward. In particular, USAF could do more to offset Noise Impacts and impacts to Terrestrial Resources as outlined above.

The Mitigation Measures chapter describes extensive reporting to USFWS. BECQ recommends that the annual reports to USFWS be shared with the CNMI natural resource agencies and that the CNMI natural resource agencies also be invited to annual coordination meetings with the DoD. BECQ would like to see increased coordination and communication with the DoD.

BECQ-DEQ looks forward to working with USAF with its earthmoving permit, stormwater management plan, and stationary source air pollution permit.

Cumulative Impacts

There are currently multiple Department of Defense projects occurring or proposed for the CNMI (MIRC, MITT, CJMT, Guam Relocation, Divert Activities, etc). Compared to the other proposed projects, the Divert Activities are relatively small. However, this does not mean that the added cumulative effect of the Divert Activities is unimportant.

As noted above in the Marine Biology section, BECQ recommends the Department of Defense issue clear documentation of the many ways in which these projects overlap and inter-connect. In what way are the Divert Activities connected to the MITT? As the DEIS notes- “military aircraft would also conduct training over the ocean within the MIRC. ... These training exercises are covered under the Programmatic Biological Opinion on military readiness activities the U.S. Navy proposes to conduct within the MIRC and the MITT” (p. 4-79).

It is not clear how the many projects of the Department of Defense overlap in the CNMI. BECQ looks forward to continued communication in order to protect the CNMI’s natural resources.

References

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