

University of Hawaii at Manoa

Environmental Center

A Unit of Water Resources Research Center Crawford 317 • 2550 Campus Road • Honolulu, Hawaii 96822 Telephone: (808) 956-7361

> April 22, 1994 RP:0157

Mr. Frank Dayton U.S. Army Corps of Engineers Guam Operations Office (CEPOD-CO-OG) 238 Archbishop F.C. Flores Street, Suite 905 Agana, Guam 96910

Dear Mr. Dayton

Saipan Marina Expansion and Improvement PODCO GIN94-010 Garapan, Saipan

The proposed activity involves the construction of a new boat marina designed to accommodate 76 boats. In addition to the new marina, it appears that two parking lots are planned, along with picnic shelters and the upgrading of an inner cove for rowboats and canoes.

The Environmental Center has reviewed the PODCO with the assistance of Peter Rappa, Sea Grant, and Heather Keevill of the Environmental Center.

In general, the information provided in the PODCO is extremely limited. As a result, the majority of the comments provided are made up of questions that should be addressed in the forthcoming Environmental Assessment (EA). The description of the proposed action and the accompanying maps in the PODCO do not indicate the nature or characteristics of the area to be dredged. Is the area presently under water but too shallow for boating? Is it exposed tidally? Is it presently all just land? Or finally, is it some combination of all these conditions? The nature of the existing site is important as it relates to the potential for impacts to Archaeological and ecological resources. The EA should provide a clear description of the physical, biological, and cultural characteristics (if appropriate), of the area to be dredged.

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Dredging

Number four on page one of the PODCO states that "the dredged material will be discharged at an inland location to be selected by the applicant and approved by the appropriate CNMI agencies". It would be more appropriate for a specific disposal area to be specified prior to the project's approval so that the location could be evaluated.

Another concern related to the dredging process is the potential for increased occurrences of ciguatera poisoning. Ciguatera poisoning is caused by eating fish that have accumulated cigua toxins. The illness may last for one day, or for years, depending on the dose and the reaction. If cigua toxins are present in an area, disturbance of the ocean environment may increase the bloom of the cigua toxin carrying dinoflagellates and therefore the occurrence of ciguatera. In light of the fact that a fishing pier is to be located within the new marina, the issue of ciguatera should be addressed. Information on the number of ciguatera cases reported in Saipan should be included along with a description of the projected use of the area in terms of fishing.

Archaeology

Number six on page one of the PODCO states that "no historical or archaeological sites listed or considered eligible for inclusion on the National Register are located at the proposed project site". While that statement clearly indicates no historical or archaeological sites listed on the National Register are located in the area of the proposed marina, the statement does not make it clear whether sites not listed on the National Register exist within the proposed marina area or even if an archaeological survey has been undertaken.

Maps

Maps of the marina and its relative location on Saipan are provided in the PODCO, but the maps do not cover surrounding areas. An additional map showing surrounding land uses should be included in the EA for a fair evaluation of the impacts of the project. Additional information on the use of the harbor should also be provided. Is this the main recreational harbor in Saipan? What is the maximum size vessel able to be accommodated? Will only sailboats and power boats use the harbor, or will some commercial use be permitted

The Environmental Assessment should address the issues cited so that an informed decision can be rendered as to the potential impacts of the proposed project. Thank you for the opportunity to review this document. We hope our comments are helpful.

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Sincerely,

Acquelin n. Driller

Jacquesin N. Miller

Associate Environmental Coordinator

cc: OEQC

Roger Fujioka Peter Rappa Heather Keevill



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April 27, 1994

Ms. Rae M. Loui Commission on Water Resource Management Department of Land and Natural Resources P.O. Box 621 Honolulu, Hawaii 96809

Dear Ms. Loui:

Re: Stream Channel Alteration Permit Hanaimoa Gulch, Hauula, Oahu

It has just come to my attention that our review comments on the Hanaimoa Gulch Stream Channel Alteration Permit contain a printing error. Please replace your copy with the corrected version that is enclosed. I apologize for the inconvenience this has caused.

Thank you for your time and understanding.

Sincerely,

Jacquelin N. Miller

Associate Environmental Coordinator