

U.S. Department of Housing and Urban Development

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Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58

Project Information

Project Name: NMHC Client Intake and Interview Booth Extension Project

Responsible Entity: Northern Marianas Housing Corporation (NMHC)

Grant Recipient (if different than Responsible Entity):

State/Local Identifier: 854855413

Preparer: Jacob Muna, Office Manager/Procurement Officer

Certifying Officer Name and Title: Jesse S. Palacios, Corporate Director

Grant Recipient (if different than Responsible Entity):

Consultant (if applicable): None

Direct Comments to: Northern Marianas Housing Corporation, P.O. Box 500514, Saipan, MP

96950; Email: nmhc@nmhc.gov.mp; Fax: (670)234-9021

Project Location:

Lot No.: 014 D 75
Micro Beach Road, Garapan, Saipan
Northern Marianas Housing Corporation
P.O. Box 500514
Saipan, MP 96950
Email: nmhc@nmhc.gov.mp

Fax: (670)234-9021;

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

Expansion of the current NMHC building to construct client intake and interview booth. Listed below are the proposed construction activities that will take place at the project site.

Scope of Work Are as Follows:

- 1. Construct new concrete column 8"x18" with 6 no. 6 vertical bars with #3 tie bars from foundation footing up 2@2", 2@4", 2@6-& rest @ 8" O.C. typical to all six columns.
- 2. Construct new 8" thick CMU wall with cement plastered painted finish type.
- 3. Order a fix aluminum door frames with 1/4" thick safety glass panel for both door and window sliding, as shown.
- 4. For new windows, use an awning window type matching with existing NMHC front main entrance door. No fix glass on top, typical.
- 5. Construct new concrete ramp as per plan.
- 6. Construct new concrete ramp as per plan and a small 12" concrete swale under the ramp. Make a 2"x12" opening under for running rain water through.
- 7. Construct a new concrete landing as per plan.
- 8. Cut existing railing for new railing extension installation as per plan.
- 9. Construct a new concrete step for new passage to existing open garden.
- 10. Fabricate a new flexi-glass window as per plan typical size for all as shown.
- 11. Fabricate a new gypsum board partition with a metal stud frame with painting finish.
- 12. Fabricate a new wooden counter top with Formica top cover finish, typical.
- 13. Fabricate a new flexi-glass window partition with a wooden frame to seal the booth from the other side. Use 2X4 and a 1X2 back to back to secure flexi-glass windows as per plan.
- 14. Fabricate a new 1.5" hand railings typical to exiting railing, as per plan.
- 15. Cut existing concrete curb as per plan.
- 16. 36" hollow core flush door with a lever type door knob. Install door stopper too, on the back of the door.
- 17. Install two new door thresholds for the entrance and exit door. Make sure the rubber under is flushed to the door, to prevent lizards and rain water from entering. To include door stoppers.
- 18. Cut and chip out existing concrete wall for new door opening and installation. Use a 36" hollow core flush door with a lever door knob.
- 19. Cut and chip out existing concrete wall for a new walkway opening, as per plan.
- 20. Fabricate a new metal box, 8"x10" ducting for the new extension's air conditioning. Each booth room should have a ceiling diffuser on top. One running towards the wall partition on top, to supply air into the new hallway walkway including to the staff's roof area. On the top install a new diffuser there as well, as per section drawing.
- 21. Fabricate a new metal frame for new drop acoustic ceiling cover in the booths as shown in the section plan. No drop ceiling for the regular staff booth station ceilings and for the front hallway walkway, as shown in the section drawings.
- 22. For the emergency exit door, use a metal door with a metal door jam and a lever door knob type.
- 23. Plants and flowers to be removed and salvaged from the front site project location.
- 24. All construction debris to be removed and disposed out from the project site.
- 25. Use a ducting system for the new extension's air conditioning.
- 26. Cutting of new door openings to be properly sealed around the cutting area. This is to prevent dust to enter the office station. Secure it with a plastic cover, covering the proposed door openings with a vapor barrier from ceiling to flooring. This should be secured before chipping of concrete walls.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

The NMHC proposes to expend the existing building to allow for client intake and interview booth to accommodate the Section 8 Housing Choice Voucher and New Construction (Multi-family) program. The expansion will also allow the NMHC to adhere to COVID-19 protocol procedures and to prevent the spread of COVID-19.

Currently, NMHC is allowing limited access to the Housing Specialist. Casework are being handled over telephone, email, and on a case by case basis limited face to face interactions.

Existing Conditions and Trends [24 CFR 58.40(a)]:

The project site is currently a developed area wherein the current NMHC building is situated. Therefore, there is not impact on the environment. The expansion of the building will not be more than 20% of existing building size.

Funding Information

Grant Number	HUD Program	Funding Amount
-	Coronavirus Aid Relief and	Approximately
	Economic Security Act	\$100,000.00
	(CARES Act) Public Law	
	116-136- HCV Program	

Estimated Total HUD Funded Amount: Approximately \$100,000.00

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: Approximately \$100,000.00

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or	Compliance determinations
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	mitigation required?	
STATUTES, EXECUTIVE Ol and 58.6	RDERS, AND I	REGULATIONS LISTED AT 24 CFR 50.4
Airport Hazards 24 CFR Part 51 Subpart D	Yes No	The Commonwealth Ports Authority has determined the project site is free from the runway clear zones.
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No	The Coastal Resources Management has determined that the project potential effects to coastal resources are likely to be less than significant. *Contractors shall apply the necessary permits prior to any construction work.*
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No	The NMHC is located in a special flood hazard area. The NMHC had obtained a Flood Insurance for the protection of NMHC building and assets.
STATUTES, EXECUTIVE OF & 58.5	RDERS, AND F	REGULATIONS LISTED AT 24 CFR 50.4
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No	The Bureau of Environmental and Coastal Quality (BECQ) has concurred with the determination of the NMHC that there will be no impact on the air quality for the project. *Prior to construction the contractor is required to obtain permits from the BECQ.*
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes No	The Coastal Resources Management has determined that the project potential effects to coastal resources are likely to be less than significant. *Contractors shall obtain the necessary permits prior to any construction activities.*
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No	The Bureau of Environmental and Coastal Quality (BECQ) has concurred with the determination of the NMHC that there is no suspected sites contaminated with toxic chemicals or radioactive materials.

Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No	The Division of Fish and Wildlife (DFW) has determined that there is no record of special status species at the project site or adjacent lots.
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes No	The Bureau of Environmental and Coastal Quality (BECQ) has concurred with the determination of the NMHC that there is no suspected sites contaminated with toxic chemicals or radioactive materials.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No	The Natural Resources Conservation Service (NRCS) has determined that the project site is not located in protected Farmland area.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No	As per the guidance of the Department of Public Works (DPW): The NMHC is located in a special flood hazard area. The NMHC must comply with all DPW, NFIP, and IBC 2018 flood hazard requirements.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No	The Historic Preservation Office (HPO) has concurred with the NMHC findings of
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes No	The Bureau of Environmental and Coastal Quality (BECQ) has concurred with the determination of the NMHC that the project will not involve development of noise sensitive uses. The project is not within a major roadway or rail road. *Contractors shall obtain the necessary permits prior to any construction activities.*
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424€; 40 CFR Part 149	Yes No	There are no sole source aquifers located at the project site.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes No	The Coastal Resources Management (CRM) had determined that the project site is likely to be situated in an Area of Particular Concern (APC). As a result, a CRM permit may be required. CRM has also determined that the area had been previously been disturbed with pre-existing structures and land clearing. As a result, CRM anticipates that the project is not

		likely to have significant adverse effects on the pattern and type of land use or growth and distribution of population including the character of existing government properties and residential areas.
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No	There are no wild or scenic rivers located at the project site.
ENVIRONMENTAL JUSTIC	E	
Environmental Justice Executive Order 12898	Yes No	The proposed project is to expand the existing building to include client intake and interview booths and to adhere to the COVID-19 safety protocols and to prevent the spread of COVID-19.

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. All conditions, attenuation or mitigation measures have been clearly identified.

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELO	PMENT	
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	Pursuant to the zoning regulations the proposed project is allowed to take place as it is considered a Rural Zone.

Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	The soil suitability of the proposed project is suitable for the project. Current building is elevated to prevent any flooding. All water runoff flow to the ponding basin. Vegetation in the area prevents any erosion.
Hazards and Nuisances including Site Safety and Noise	2	The proposed project would involve construction of one-storey building to expand the existing building to provide room for client intake and interview booth in observance of the COVID-19 safety protocols and to prevent the spread of COVID-19. Contractor is required to adhere to procedures in handling hazardous materials. The NMHC does not anticipate any use of hazardous materials onsite. Contractors obtaining a permit must adhere to the permitting requirements such as construction safety and noise.
Energy Consumption	2	The construction activity may require little to no use of energy besides equipment that requires the use of fossil fuels and electrical generator.

Environmental	Impact	
Assessment Factor	Code	Impact Evaluation
SOCIOECONOM	1IC	
Employment and Income Patterns		No Adverse impact are anticipated from the project on employment and income within the project area.
Demographic Character Changes, Displacement		The project is expected to provide ample space to assist the current clients of the Section 8 Housing Choice Voucher Program and the Section New Construction Program. Currently, due to the COVID-19 protocols clients are scheduled on a case by case basis to meet face to face with their housing specialist. With the addition of the booths construction specifications requires contractors to build the booths with protective coverings for the housing specialist and the clients.

Environmental	Impact	
Assessment Factor	Code	Impact Evaluation
COMMUNITY F	ACILITIE	S AND SERVICES
Educational and	2	There is no adverse impact on educational and cultural
Cultural Facilities		facilities. The proposed project is being built within the
		vicinity of the existing building.
Commercial	2	There is no adverse impact on commercial facilities. The
Facilities		proposed project is being built within the vicinity of the
		existing building.
Health Care and	2	There is no adverse impact on Health Care and Social
Social Services		Services facilities. The proposed project is being built within
		the vicinity of the existing building.

Solid Waste Disposal / Recycling	2	There is no adverse impact on Solid Waste Disposal and Recycling facilities. The proposed project is being built within the vicinity of the existing building.
Waste Water / Sanitary Sewers	2	There is no adverse impact on Waste Water and Sanitary Sewer facilities. The proposed project is being built within the vicinity of the existing building.
Water Supply	2	There is no adverse impact on Water Supply facilities. The proposed project is being built within the vicinity of the existing building.
Public Safety - Police, Fire and Emergency Medical	2	There is no adverse impact on Public Safety Services. The proposed project is being built within the vicinity of the existing building.
Parks, Open Space and Recreation	2	There is no adverse impact on Parks, Open Space and Recreation facilities. The proposed project is being built within the vicinity of the existing building.
Transportation and Accessibility	2	There is no adverse impact on Transportation and Accessibility services. The proposed project is being built within the vicinity of the existing building.

Environmental	Impact	
Assessment Factor	Code	Impact Evaluation
NATURAL FEATU	RES	
Unique Natural	2	There is no adverse impact on the Unique Natural Features
Features,		and Water Resources. The proposed project is being built
Water Resources		within the vicinity of the existing building.
Vegetation, Wildlife	2	There is no adverse impact on Vegetation and Wildlife.
		The proposed project is being built within the vicinity of
		the existing building.
Other Factors	2	State laws and regulations requires all construction
		activities to go through a permit process. Therefore,
	*	requirements are in place to ensure there is minimal impact
		on the environment.

Additional Studies Performed:

None

Field Inspection (Date and completed by):

December 14, 2020: Jacob Muna

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

- Department of Public Works (DPW)
 Bureau of Environmental and Coastal Quality (BECQ)
- 3. Historic Preservation Office (HPO)

- 4. Division of Fish and Wildlife (DFW)
- 5. USDA
- 6. Commonwealth Ports Authority (CPA)
- 7. Zoning Office

List of Permits Obtained:

Selected contractor will be responsible to obtain the permits needed to commence the construction activities of the proposed project.

Public Outreach [24 CFR 50.23 & 58.43]:

The NMHC shall provide publish a notice to the local newspaper outlets, NMHC website and social media outlet to review the completed environmental review and allow the public make comments.

Cumulative Impact Analysis [24 CFR 58.32]:

Per consultation with all environmental permitting agencies there will be no adverse impact in the environment as the construction activities are minimal. The state laws and regulations requires all construction contractors to obtain the necessary permits in order to commence any construction activities.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

None:

No Action Alternative [24 CFR 58.40(e)]:

The NMHC considers a no action alternative because the proposed project cannot be relocated to another site because the operation is based at the project site wherein the main building and operation is situated. Relocating the entire agency and its operation will be cost prohibitive. Therefore, NMHC determines there are no practicable sites available. The proposed action must be located in a flood plain.

Summary of Findings and Conclusions:

The NMHC recommends for the project to commence to ensure that COVID-19 protocols are followed to prevent the spread of COVID-19. The proposed project is to ensure continuity of the NMHC Section 8 Housing Choice Voucher Program and Section 8 New Construction Program. The completion of the project will ensure a smooth process in addressing the program requirements of the program participants and the inquiries of the community in general.

The NMHC shall ensure all regulations and policies of the State Department of Public Works; International Building Code, and NFIP are adhered to. The NMHC shall continue to obtain flood insurance to protect NMHC's building and assets from any flood occurrence.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with

the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure
Department of Public Works (DPW) Bureau of Environmental and Coastal Quality (BECQ) Historic Preservation Office (HPO) Zoning Office Division of Fish & Wildlife (DFW)	Prior to any construction activity selected contractor shall apply for a "One Start Permit". The permitting process will have to go through all regulatory agencies before commencing any ground breaking on the project.

Determination:

Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.27] The project will not result in a significant impact on the quality of the human environment.	
Finding of Significant Impact [24 CFR 58.40(g)(2); 40 CFR 1508.27] The project may significantly affect the quality of the human environment.	
Preparer Signature: Date: 03 11/2	-1
Name/Title/Organization: Jacob Muna, Office Manager/Procurement Officer	
Certifying Officer Signature:Date:	
Name/Title: Jesse S. Palacios, Corporate Director	

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).



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