# COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS
# NORTHERN MARIANAS HOUSING CORPORATION

## PUBLIC NOTICE
## 03/09/2022

This Notice is paid by NMHC with HUD funds.

### NOTICE OF FINDING OF NO SIGNIFICANT IMPACT AND NOTICE OF INTENT TO REQUEST A RELEASE OF FUNDS

Government of the Commonwealth of the Northern Mariana Islands
Northern Marianas Housing Corporation
Saipan, MP 96950 Tel: (670) 234-9447/6866

This notice shall satisfy the above-cited two separate but related procedural notification requirements.

REQUEST FOR RELEASE OF FUNDS

On or after March 25, 2022, the Government of the Commonwealth of the Northern Mariana Islands will submit a request to the U.S. Department of Housing and Urban Development, Washington D.C., for the release of Community Development Block Grant Disaster Recovery (CDBG-DR) Supplemental Appropriations for Disaster Relief Act, 2019 P.L. 116-20, enacted on January 27, 2020, announced via Federal Register Notice, to undertake the following activity and purposes in Saipan, Commonwealth of the Northern Mariana Islands:

**Project Activity/Type:**
Public School System (PSS) Marianas High School (MHS) Career and Technical Center (CTE) construction of a new building.

The MHS CTE was damaged by Super Typhoon Yutu around October 2018. The MHS CTE building was assessed and evaluated by FEMA representatives and found that the extent of the damage for repair cost exceeded beyond 87.5% of the building replacement. Instead of partial repairs of the building, it was determined it is more beneficial for the CNMI to construct a new building.

This project is about 50,000 square feet two-storey concrete building. The building will house the following programs: The hospitality and tourism training; Automotive technology workshop; Computer and Server supporting information technology; Cosmetology classroom and mock-up salon and laboratory space; Health science and nursing space with clinic; Dressing room and storage; Music room for performing arts; and Commercial teaching kitchen for culinary arts.

**Purpose:**
The Northern Marianas Housing Corporation (NMHC) recognizes the requirements provided under 83 FR 40314 but firmly believes that the eligible activities under CDBG-DR Infrastructure Program are permissible and thereby asserts that the PSS MHS CTE is an essential component that trains 600 students annually for careers and skills needed in the CNMI economy. The need to fill the technical labor workforce in the CNMI begins with the training of skills and knowledge needed for employment. This project ensures the future of CNMI workforce consistency and enhancement of individual contribution to the island labor pool.

**Location:**
Lot 39 H 01, Susupe Village, Saipan MP 96950

**Total Project Cost:**
$6,000,000.00:CDBG-DR funding
$6,000,000.00: Economic Development Administration (EDA)
Total Combined Funding: $12,000,000.00

## FINDING OF NO SIGNIFICANT IMPACT

The Government of the Commonwealth of the Northern Mariana Islands has determined that the above-listed projects will have no significant impact on the human environment. Therefore, an Environmental Impact Statement under the National Environmental Policy Act of 1969 (NEPA) is not required. Additional project information is contained in the Environmental Review Record (ERR) and is ready for public viewing on the Northern Marianas Housing Corporation (NMHC) website at www.nmhcgov.net or www.cnmi-cdbgdr.com; or you may visit the on file at the NMHC Central Office in Garapan, Saipan or NMHC CDBG-DR Office in Beach Road Chalan Laulau, Saipanamined during regular work hours, Monday through Friday except CNMI Holidays, from 7:30 A.M. to 4:30 P.M.

## PUBLIC COMMENTS

Any individual, group or agency disagreeing with this determination or wishing to comment on the project may submit written comments to the Northern Marianas Housing Corporation. You may submit comments from the following options: Via mail to P.O. Box 500514, Saipan, MP 96950; Direct delivery to the central office in Garapan, Saipan or drop-box located in front of the building; and Via email at nmhc@nmhc.gov.mp. All comments received by **March 24, 2022, 4:00 p.m.,** will be considered by the Government of the Commonwealth of the Northern Mariana Islands prior to authorizing submission of a request for release of funds. Commentors should specify which part of this Notice they are addressing.

## RELEASE OF FUNDS

The Government of the Commonwealth of the Northern Mariana Islands certifies to the U. S. Department of Housing and Urban Development (HUD), Washington D.C. that the Government of the Commonwealth of the Northern Mariana Islands and Governor Ralph DLG. Torres consent to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process, and that these responsibilities have been satisfied. The U. S. Department of Housing and Urban Development (HUD), Washington D.C. acceptance of the certification satisfies its responsibilities under the National Environmental Policy Act of 1969 and related laws and authorities, and allows the Government of the Northern Mariana Islands to use Program Funds.

## OBJECTION TO RELEASE OF FUNDS

The U. S. Department of Housing and Urban Development (HUD) Washington D.C. will accept objections to its release of funds and the Government of the Northern Mariana Islands certification for a period of **fifteen days** following anticipated submission date or its actual receipt of the request (whichever is later) only if it is on one of the following bases: (a) the certification was not executed by the Certifying Officer of the Government of the Northern Mariana Islands; (b) the Government of the Northern Mariana Islands has omitted a step or failed to make a decision or finding required by the U. S. Department of Housing and Urban Development regulations at 24 CFR Part 58; (c) the grant recipient has incurred cost not authorized by 24 CFR Part 58 before approval of the release of funds by the U. S. Department of Housing and Urban Development; or (d) another Federal agency acting pursuant to 40 CFR Part 1504 has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted in accordance with the required procedures of 24 CFR Part 58 and shall be addressed to Ms. Tennille Smith Parker, DRSI Division Director, HUD, via email at Tennille.S.Parker@hud.gov ; Tel: (202)402-4649. Potential objectors should contact the U.S. Department of Housing and Urban Development to verify the actual last day of the objection period.

**/s/**
**Ralph DLG Torres**
**Governor, CNMI**

**U.S. Department of Housing and Urban Development**
451 Seventh Street, SW
Washington, DC 20410
www.hud.gov

espanol.hud.gov

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

## Project Information

**Project Name:** PSS Marianas High School Career and Technical Education Center Project

**Responsible Entity:** Northern Marianas Housing Corporation (NMHC)

**Grant Recipient** (if different than Responsible Entity):

**State/Local Identifier**: 854856277

**Preparer:** Wilfred C. Villagomez, Project Supervisor

**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 39 H 01, Susupe Village, Saipan, MP 96950

**Description of the Proposed Project** [24 CFR 50.12 & 58.32; 40 CFR 1508.25]**:**
The Public School System (PSS) Marianas High School (MHS) Career and Technical Education Center (CTE) construction of a new building.

The MHS CTE was damaged by Super Typhoon Yutu around October 2018. The MHS CTE Building was assessed and evaluated by FEMA representatives and found that the extent of the damage for repair cost exceeded beyond 87.5% of the building replacement. Instead of partial repairs of the building, it was determined it is more beneficial to the CNMI to construct a new building.

This project is about 50,000 square feet two-story concrete building. This will house the following programs: The hospitality and tourism training; Automotive technology workshop;

Computer and server supporting information technology; Cosmetology classroom and mock-up salon and laboratory space; Health science and nursing space with clinic; Dressing room and storage; Music room for performing arts; and Commercial teaching kitchen for culinary arts.

**Statement of Purpose and Need for the Proposal** [40 CFR 1508.9(b)]:
The Northern Marianas Housing Corporation (NMHC) recognizes the requirements provided under 83FR 40314 but firmly believes that the eligible activities under CDBG-DR Infrastructure Program are permissible and thereby asserts the PSS MHS CTE is an essential component that trains over 600 students annually for careers and skills needed in the CNMI economy. The need to fill the technical labor workforce in the CNMI begins with the training of skills and knowledge needed for employment. This project ensures the future of CNMI workforce consistency and enhancement of individual contribution to the island labor pool.

**Existing Conditions and Trends** [24 CFR 58.40(a)]:
The project is needed to continue the training and skills needed to ensure a constant need for skill workers in the CNMI. The conditions that exist now is hampering the future development of individuals skills with no training for needed skills. Once this career center is operational, we will begin to invest in the CNMI's with less dependence on outside skill laborers.

## Funding Information

| Grant Number | HUD Program | Funding Amount |
|---|---|---|
| B-19-DV-69-0001 & B-19-DV-69-0002 | Community Development Block Grant- Disaster Recovery (CDBG-DR) | $6,000,000.00 |
| | | |

**Estimated Total HUD Funded Amount:** Approximately $ 6,000,000.00

**Estimated Total Project Cost** (HUD and non-HUD funds) [24 CFR 58.32(d)]**:**

| | |
|---|---|
| NMHC CDBG-DR | $ 6,000,000.00 |
| Economic Development Administration (EDA) | $ 6,000,000.00 |
| Total Cost of the Project: | $ 12,000,000.00 |

## 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 mitigation required? | Compliance determinations |
|---|---|---|
| **STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6** | | |
| **Airport Hazards**<br><br>24 CFR Part 51 Subpart D | Yes ☐ No ☒ | The CNMI Commonwealth Ports Authority has determined the project site is free from the runway clear zones.<br>See Appendix A on Letter Dated January 11, 2022, Map of Location and Airport Hazards (CEST and EA) Worksheet. |
| **Coastal Barrier Resources**<br><br>Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501] | Yes ☐ No ☒ | This regulation does not apply to the project area; therefore, the project is in compliance.<br>See Appendix B on Letter Dated February 02, 2022, Map of Location and Coastal Barrier Resources (CEST and EA) Worksheet.<br>*Contractors shall apply the necessary permits prior to any construction work* |
| **Flood Insurance**<br><br>Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a] | Yes ☐ No ☒ | There are no Flood Insurance for Public Infrastructures.<br>See Appendix D on Letter Dated February 18, 2022, Map of Location and Flood Insurance (CEST and EA) Worksheet. |
| **STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5** | | |
| **Clean Air**<br><br>Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93 | Yes ☐ No ☒ | The CNMI Bureau of Environmental and Coastal Quality (BECQ) is within an "attainment" are, OR if within a "non-attainment" area, the project conforms with the EPA-approved State Implementation Plan (SIP), per contact with the State Air Quality Management District or Board.<br>See Appendix C on Letter Dated January 18, 2022 and Air Quality (CEST and EA) Worksheet.<br>*Prior to construction the contractor is required to obtain permits from the BECQ* |

| | | |
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| **Coastal Zone Management**<br><br>Coastal Zone Management Act, sections 307(c) & (d) | Yes ☐ No ☒ | The CNMI Coastal Resources Management had determined the proposed does not anticipate the project will cause significant public controversy and believes that the public and other agencies will be supportive of these activities.<br><br>See Appendix B on Letter Dated February 2, 2022, Map of Location and Coastal Zone Management Act (CEST and EA) Worksheet.<br><br>*Contractors shall obtain the necessary permits prior to any construction activities* |
| **Contamination and Toxic Substances**<br><br>24 CFR Part 50.3(i) & 58.5(i)(2) | Yes ☐ No ☒ | The CNMI Bureau of Environmental and Coastal Quality (BECQ) concurs the project will have not have significant impact on the environment as defined by the National Environmental Policy Act.<br><br>See Appendix C on Letter Dated January 18, 2022 and Contamination and Toxic Substances (Multifamily and Non-Residential Properties) Worksheet. |
| **Endangered Species**<br><br>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402 | Yes ☐ No ☒ | The CNMI Division of Fish & Wildlife (DFW) has determined that they do not anticipate impacts to the T&E species.<br><br>See Appendix E on Letter Dated October 31, 2019 and Endangered Species Act (CEST and EA) Worksheet. |
| **Explosive and Flammable Hazards**<br><br>24 CFR Part 51 Subpart C | Yes ☐ No ☒ | The CNMI Bureau of Environmental and Coastal Quality (BECQ) confirms the project is located at an Acceptable Separation Distance ASD from any above-ground or flammable fuels or chemical containers according to "siting of HUD-Assistance Projects Near Hazardous Facilities. Or will have significant impact of the environment as defined by the National Environmental Policy Act.<br><br>See Appendix C on Letter Dated January 18, 2022 and Explosive and Flammable Hazards (CEST and EA) Worksheet. |
| **Farmlands Protection**<br><br>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 NO protected Farmlands will be impacted.<br><br>See Appendix F on AD-1006, Map of Location and Farmlands Protection (CEST and EA) Worksheet. |

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| **Floodplain Management**<br><br>Executive Order 11988, particularly section 2(a); 24 CFR Part 55 | Yes ☐ No ☒ | The Department of Public Works has determined that the project is not located in the special flood hazard area.<br>See Appendix D on Letter Dated February 18, 2022, Map of Location from FEMA's National Flood Hazard Layer and Floodplain Management (CEST and EA) Worksheet. |
| **Historic Preservation**<br><br>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800 | Yes ☐ No ☒ | The CNMI Historic Preservation Office (HPO) determines that the historic properties can be found adjacent and not within the subject projects are Areas of Potential Effect (APE). Should there be inadvertent findings during construction, all earthmoving activities will stop and HPO will be notified.<br>See Appendix I on Letter Dated December 23, 2020 and Historic Preservation (CEST and EA) Worksheet. |
| **Noise Abatement and Control**<br><br>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B | Yes ☐ No ☒ | The CNMI 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.<br>See Appendix C on Letter Dated January 18, 2022 and Noise (EA Level Reviews) Worksheet.<br>*Contractors shall obtain the necessary permits prior to any construction activities* |
| **Sole Source Aquifers**<br><br>Safe Drinking Water Act of 1974, as amended, particularly section 1424€; 40 CFR Part 149 | Yes ☐ No ☒ | The CNMI has no Sole Source Aquifers.<br>See Appendix G on HUD map for Sole Source Aquifers (CEST and EA) Worksheet. |
| **Wetlands Protection**<br><br>Executive Order 11990, particularly sections 2 and 5 | Yes ☐ No ☒ | The project does not go through any wetlands.<br>The CNMI Bureau of Environmental and Coastal Quality (BECQ) had determined that the project site does not involve new construction within or adjacent to wetlands, marshes, wet meadows, mudflats, or natural ponds per field observation and maps issued by the USDI Fish & Wildlife Service or U.S. Corps of Engineers.<br>See Appendix C on Letter Dated January 18, 2022 and Wetland map from National US Fish & Wildlife Service Wetlands Inventory and Wetlands (CEST and EA) Worksheet. |

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| **Wild and Scenic Rivers**<br><br>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c) | Yes ☐ No ☒ | There are no wild or scenic rivers located in the CNMI.<br>See Appendix H on Map of Location from National Rivers Inventory. |
| **ENVIRONMENTAL JUSTICE** | | |
| **Environmental Justice**<br><br>Executive Order 12898 | Yes ☐ No ☒ | We have determined there will be no adverse environmental impact that could have a potential to have disproportionate impact on low income or minority populations. There will be low income or minority individuals that will use this facility to improve their lives, their knowledge which will assist in getting better jobs and be beneficial to the CNMI. |

**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 DEVELOPMENT** | | |
| Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design | 2 | Pursuant to the zoning regulations the project activity is acceptable. |

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|---|---|---|
| Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff | 2 | The soil suitability of the proposed project is suitable for the project. The project use the same footprint as the previous building resulting in the same runoff and drainage system. |
| Hazards and Nuisances including Site Safety and Noise | 2 | The proposed project would not involve hazardous and nuisances including Site Safety and Noise.<br><br>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 Assessment Factor | Impact Code | Impact Evaluation |
|---|---|---|
| **SOCIOECONOMIC** | | |
| Employment and Income Patterns | 2 | No Adverse impact are anticipated from the project on employment and income within the project area. |
| Demographic Character Changes, Displacement | 2 | There are no character changes or displacement for this project. The project will mitigate the flooding issue at the project site. |

| Environmental Assessment Factor | Impact Code | Impact Evaluation |
|---|---|---|
| **COMMUNITY FACILITIES AND SERVICES** | | |
| Educational and Cultural Facilities | 2 | There is no adverse impact on educational and cultural facilities. |
| Commercial Facilities | 2 | There is no adverse impact on commercial facilities. |
| Health Care and Social Services | 2 | There is no adverse impact on Health Care and Social Services facilities. |
| Solid Waste Disposal / Recycling | 2 | There is no adverse impact on Solid Waste Disposal and Recycling facilities. |
| Waste Water / Sanitary Sewers | 2 | There is no adverse impact on Waste Water and Sanitary Sewer facilities. |
| Water Supply | 2 | There is no adverse impact on Water Supply facilities. |

| | | |
|---|---|---|
| Public Safety - Police, Fire and Emergency Medical | 2 | There is no adverse impact on Public Safety Services. |
| Parks, Open Space and Recreation | 2 | There is no adverse impact on Parks, Open Space and Recreation facilities. |
| Transportation and Accessibility | 2 | There is no adverse impact on Transportation and Accessibility services. |

| Environmental Assessment Factor | Impact Code | Impact Evaluation |
|---|---|---|
| **NATURAL FEATURES** | | |
| Unique Natural Features, Water Resources | 2 | There is no adverse impact on the Unique Natural Features and Water Resources. |
| Vegetation, Wildlife | 2 | There is no adverse impact on Vegetation and Wildlife. |
| Other Factors | 2 | State laws and regulations requires all construction activities to go through a permit process. |

**Additional Studies Performed**:

**Field Inspection** (Date and completed by): **April 28, 2021**

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

1. CNMI Commonwealth Ports Authority (CPA)
2. CNMI Coastal Resource Management (DCRM)
3. CNMI Bureau of Environmental and Coastal Quality (BECQ)
4. CNMI Division of Fish & Wildlife (DFW)
5. CNMI Department of Public Works (DPW)
6. CNMI Historic Preservation Office (HPO)
7. USDA Natural Resource Conservation Service (NRCS)
8. CNMI 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]

There is no significant impact to the environment for this project.

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

The NMHC considers a no action alternative because the proposed project cannot be relocated to another school. It would change the curriculum of the schools teaching in the trades sector. Therefore, NMHC determines there are no practicable sites available. The proposed action must remain at its current site.

**Summary of Findings and Conclusions:**

This project will not impact the environment as the project is for the benefit of the students and the community. This project will enhance the community when completed.

## 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 |
|---|---|
| | |
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**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: 3/2/2022

Name/Title/Organization: Wilfred C. Villagomez, CDBG-DR Project Supervisor, NMHC

Reviewed by: Jacob Muna, Office Manager/Procurement Officer, NMHC 3/03/22

Certifying Officer Signature: _____ Date: 3/3/22

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).

# SUMMARY OF APPENDIX

| | |
|---|---|
| **APPENDIX A** | **CNMI COMMONWEALTH PORTS AUTHORITY** |
| **APPENDIX B** | **CNMI COASTAL RESOURCES MANAGEMENT** |
| **APPENDIX C** | **CNMI BUREAU OF ENVIRONMENTAL COASTAL QUALITY** |
| **APPENDIX D** | **CNMI DEPARTMENT OF PUBLIC WORKS** |
| **APPENDIX E** | **CNMI DIVISION OF FISH & WILDLIFE** |
| **APPENDIX F** | **USDA NATURAL RESOURCES CONSERVATION SERVICE** |
| **APPENDIX G** | **WILD & SCENIC RIVERS** |
| **APPENDIX H** | **SOLE SOURCE AQUIFERS** |
| **APPENDIX I** | **CNMI HISTORIC PRESERVATION OFFICE** |
| **APPENDIX J** | **CNMI ZONING OFFICE** |
| **APPENDIX K** | **PSS Marianas High School Career and Technical Center** |

# Appendix A

# Commonwealth Ports Authority

Francisco C. Ada/Saipan International Airport
PO BOX 501055•SAIPAN•MP•96950
Phone: (670) 237-6500/01 Fax: (670) 234-5962
E-Mail Address: cpa.admin@pticom.com Website: https://cnmiports.com


January 11, 2022

Mr. Jonathan I. Arriola
DR Project Manager
Northern Marianas Housing Corporation
PO Box 500514
Saipan, MP 96950

Dear Mr. Arriola:

Subject: Request for Determination of Effect
Marianas High School - New Building (Career and Technical Education Center)
Lot No. 39 H 01 – Susupe, Saipan

This is in reference to your letter dated January 10, 2022 requesting Determination of Effect for the above-referenced project.

After review of the location, we found it to be free from the Airport Clear Zones and Accident Potential Zones. As such, the determination of effect is hereby given.

Should you have any questions or require additional information, please feel free to contact us.

Sincerely,

CHRISTOPHER S. TENORIO
Executive Director

cc: file

## Airport Hazards (CEST and EA)

| General policy | Legislation | Regulation |
|---|---|---|
| It is HUD's policy to apply standards to prevent incompatible development around civil airports and military airfields. | | 24 CFR Part 51 Subpart D |
| **References** | | |
| https://www.hudexchange.info/environmental-review/airport-hazards | | |

1. **To ensure compatible land use development, you must determine your site's proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?**

   ☒No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within the applicable distances to a military or civilian airport.*

   ☐Yes → *Continue to Question 2.*

2. **Is your project located within a Runway Potential Zone/Clear Zone (RPZ/CZ) or Accident Potential Zone (APZ)?**

   ☐Yes, project is in an APZ → *Continue to Question 3.*

   ☐Yes, project is an RPZ/CZ → *Project cannot proceed at this location.*

   ☐No, project is not within an APZ or RPZ/CZ

   → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within either zone.*

3. **Is the project in conformance with DOD guidelines for APZ?**

   ☐Yes, project is consistent with DOD guidelines without further action.

   **Explain how you determined that the project is consistent:**

   → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documentation supporting this determination.*

☐No, the project cannot be brought into conformance with DOD guidelines and has not been approved. → *Project cannot proceed at this location.*

☐Project is not consistent with DOD guidelines, but it has been approved by Certifying Officer or HUD Approving Official.

**Explain approval process:**

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**If mitigation measures have been or will be taken, explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

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→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documentation supporting this determination.*

**Worksheet Summary**

**Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

| |
|---|
| Located in Susupe, Saipan on Lot # 39 H 01. The CNMI Commonwealth Ports Authority has determined the project is free from Airport Clear Zones and Accident Potential Zones. |


B
0
1.00 km
2.00 km
3.00 km
4.00 km
5.00 km
A
Point A to Point B: 3.11 mi (5.00 km)

# Appendix B

Commonwealth of the Northern Mariana Islands
**OFFICE OF THE GOVERNOR**
**Bureau of Environmental and Coastal Quality**
Division of Coastal Resources Management
P.O. Box 501304, Saipan, MP 96950
Tel: (670) 664-8300; Fax: (670) 664-8315
www.dcrm.gov.mp

**Eli D. Cabrera**
Administrator

**Richard V. Salas**
Director, DCRM

February 2, 2022

Ref. No. PRM22-026/307-22-014

Jonathan I. Arriola
Project Manager
Northern Marianas Housing Corporation
P.O. Box 500514
Saipan, MP 96950
Email: drprojectmanager@nmhcgov.net

**Re: Request for a Determination of Effect – PSS Marianas High School Career and Technical Education Center**

Dear Mr. Arriola,

The Division of Coastal Resources Management (DCRM) is in receipt of your letter dated January 18, 2022 requesting for a determination of effect on the proposed construction of a new Marianas High School Career and Technic Education Center. As stated in your letter, the project is situated on Lot No. 39 H 01 in Susupe, Saipan, and that this project will be funded by the Department of Housing and Urban Development (HUD) through the Community Development Block Grant-Disaster Recovery Program (CDBG-DR).

Based on our review of your proposal and design plans, DCRM has determined that the proposed project is wholly situated outside of DCRM's designated Areas of Particular Concern. Moreover, based on the proposed scope of work, the scale of the project, and demolition work, DCRM finds that this project is likely to have a less than significant adverse impact to area's air quality, adjacent traffic, landowners, and on-campus students and staff. Furthermore, since the design plans are not final, DCRM is unable to determine if the proposed project meets DCRM's definition of a Major Siting development.

To the extent that the project will require issuance of a federal license or permit subject to federal consistency review, submission of a consistency determination certifying that issuance of the federal license or permit complies with the enforceable policies of the CNMI Coastal Management Program (CMP) may be necessary.

DCRM does not anticipate that this project will cause significant public controversy and believes that the public and other agencies will be supportive of the proposed actions. However, given that the project is or will be federally funded, a One Start permit from the Division of Environmental Quality (DEQ), will be required. This application will enable the DEQ, DCRM, Historic Preservation Office (HPO), and all other applicable regulatory agencies to review your project proposals more thoroughly. Moreover, as this project will be duly permitted by relevant

CNMI agencies, DCRM anticipates that this project will not conflict with any CNMI environmental, conservation, or land use laws and regulations.

We look forward to continued coordination as your client plans and seeks permits for this important project. Should you have any questions or need assistance, please call Ms. Sam Sablan at (670) 664-8300 for assistance.

Sincerely,

RICHARD V. SALAS
Director
Division of Coastal Resources Management

## Coastal Barrier Resources (CEST and EA)

| General requirements | Legislation | Regulation |
|---|---|---|
| HUD financial assistance may not be used for most activities in units of the Coastal Barrier Resources System (CBRS). See 16 USC 3504 for limitations on federal expenditures affecting the CBRS. | Coastal Barrier Resources Act (CBRA) of 1982, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501) | |
| **References** | | |
| https://www.hudexchange.info/environmental-review/coastal-barrier-resources | | |

Projects located in the following states must complete this form.

| | | | | | |
|---|---|---|---|---|---|
| Alabama | Georgia | Massachusetts | New Jersey | Puerto Rico | Virgin Islands |
| Connecticut | Louisiana | Michigan | New York | Rhode Island | Virginia |
| Delaware | Maine | Minnesota | North Carolina | South Carolina | Wisconsin |
| Florida | Maryland | Mississippi | Ohio | Texas | |

**1. Is the project located in a CBRS Unit?**

☒No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within a CBRS Unit.*

☐Yes → *Continue to Question 2.*

> Federal assistance for most activities may not be used at this location. You must either choose an alternate site or cancel the project. In very rare cases, federal monies can be spent within CBRS units for certain exempted activities (e.g., a nature trail), after consultation with the Fish and Wildlife Service (FWS) (see 16 USC 3505 for exceptions to limitations on expenditures).

**2. Indicate your selected course of action.**

☐ After consultation with the FWS the project was given approval to continue

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map and documentation of a FWS approval.*

☐ Project was not given approval

Project cannot proceed at this location.

**Worksheet Summary**

**Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Located in Susupe, Saipan Lot No. 39 H 01.
The CNMI Coastal Resource Management Office has determined this project is not partially or wholly situated within any DCRM's designated Area's of Particular Concern (APCs).

**Are formal compliance steps or mitigation required?**

☐ Yes

☒ No

# Appendix C

# NORTHERN MARIANAS HOUSING CORPORATION

**Community Development Block Grant – Disaster Recovery (CDBG-DR) Division**

P.O. BOX 500514, Saipan, MP 96950-0514

Email: cnmi-cdbg-dr@nmhcgov.net

Website: http://www.cnmi-cdbgdr.com

Tels: (670) 233-9447
233-9448
233-9449
233-9450
Fax: (670) 233-9452



January 18, 2022

Ms. Zabrina Cruz
Director
Division of Environmental Quality
P.O. Box 501304
Saipan, MP 96950

Dear Ms. Cruz,

The Northern Marianas Housing Corporation (NMHC) Community Development Block Grant-Disaster Recovery Program (CDBG-DR) is in the process of preparing the Environmental Assessment Statutory Checklist (24 CFR § 58.35). NMHC CDBG DR is kindly requesting ***concurrence*** for the Determination of Effect for the proposed New Building replacing existing typhoon damaged facility for Public School System (PSS) Marianas High School Career and Technical Education Center located in Lot # 39 H 01, Susupe Village, Saipan.

The proposed project will be funded by the Department of Housing and Urban Development (HUD) through the Community Development Block Grant-Disaster Recovery Program (CDBG-DR).

Before we commence any **New Construction Activity** on this lot, we are required to obtain a certification from your office with respect to the following:

1. ***Explosive or Flammable Operations:***

That the project is located at an Acceptable Separation Distance (ASD) from any above-ground explosive or flammable fuels or chemicals containers according to "Siting of HUD-Assistance Projects Near Hazardous Facilities" (Appendix F, pp.51-52), ***OR*** the project will expose neither people nor building to such hazards.

2. ***Toxic/Hazardous/Radioactive, Material, Contamination, Chemical or Gases:***

That the project does not involve new development for habitation; ***OR*** the project involves new development for habitation, but is not located within one mile of an NPL ("Superfund") site, within ½ mile of a CERCLIS site, nor adjacent to any other known or suspected sited contaminated with toxic chemicals or radioactive source determines it does not pose a health hazard.

3. ***Environmental Justice:***

That the project site is suitable for its proposed use and the project won't be adversely affected by existing environmental conditions.

**NORTHERN MARIANAS HOUSING CORPORATION**
**Community Development Block Grant – Disaster Recovery (CDBG-DR) Division**
P.O. BOX 500514, Saipan, MP 96950-0514
Email: cnmi-cdbg-dr@nmhcgov.net
Website: http://www.cnmi-cdbgdr.com

Tels: (670) 233-9447
233-9448
233-9449
233-9450
Fax: (670) 233-9452

4. ***Sole Source Aquifers:***

That the project is not located within an area designed by EPA as being supported by sole source aquifer, ***OR*** the project need not be referred to EPA for evaluation according to the HUD-EPA (Region IX) Sole Source Aquifer Memorandum of Understanding of 1990.

5. ***Air Quality:***

That the project is located within an "attainment" are, ***OR*** if within a "non-attainment" area, the project conforms with the EPA-approved State Implementation Plan (SIP), per contact with the State Air Quality Management District or Board.

6. ***Noise Abatement and Control:***

That the project does not involve development of noise sensitive uses, ***OR*** the project is not within line-of-sight of an arterial roadway or railroad, ***OR*** ambient noise level is 65 LDN (or CNEL) or less, based upon the HUD Noise Assessment Guidelines (NAG) study for calculating noise levels.

7. ***Wild and Scenic Rivers:***

That the project is not located within a mile of a listed Wild and Scenic River or that it will have no effects on the natural, free flowing or scenic qualities of a river.

8. ***Wetlands Protection:***

That the project does not involve new construction within or adjacent to wetlands, marshes, wet meadows, mud flats or natural ponds per field observation and maps issued by the USDI Fish & Wildlife Service or U.S. Corps of Engineers.

Should your office determine the presence of explosives, flammable, toxic, hazardous, or radioactive materials on or within a mile of the above lot, please include the appropriate mitigation disclosure and clearance documents.

Thank you for your assistance, and we look forward to receiving your earliest response. Should you have any questions regarding this request, please let us know.

Sincerely,

Jonathan I. Arriola
DR Project Manager

# NORTHERN MARIANAS HOUSING CORPORATION

**Community Development Block Grant – Disaster Recovery (CDBG-DR) Division**

P.O. BOX 500514, Saipan, MP 96950-0514

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233-9450
Fax: (670) 233-9452


**Division of Environmental Quality Concurrence:**

**Based on your requests above, the CNMI Division of Environmental Quality does not believe that this project will have a significant impact on the environment as defined by the National Environmental Policy Act. Your project may require permits from DEQ or other local or federal agencies, and your responsibility to obtain them is not obviated by this letter.**

01/28/2022

**Zabrina Cruz, Director** **Date**
**Division of Environmental Quality**

Commonwealth of the Northern Mariana Islands
OFFICE OF THE GOVERNOR
Bureau of Environmental and Coastal Quality
**Division of Environmental Quality**

Based on your requests, the Division of Environmental Quality does not believe that this project will have a significant impact on the environmental as defined by the National Environmental Protection Act. Your project may require permits from DEQ or other local or federal agencies, and your responsibility is to obtain them is no obviated by this concurrence. Be advised of the comments, recommendations and requirements from the DEQ programs below.

| **Request from:** | **Project Site:** | **Project Description:** |
|---|---|---|
| Northern Marianas Housing Corporation | PSS Marianas High School career & Technical Education Center | New Construction |
| Date: 01/28/2022 | | |

| **Wastewater, Earthmoving, & Erosion Control** | **Water Quality/Nonpoint Source** | **Clean Air Program** |
|---|---|---|
| Scope of work entails that the proposed construction activity will remain on the existing building floor footprint; An earthmoving permit is NOT REQUIRED for the proposed activity. WEEC, howerever, highly recommends that Best Management Practices be utilized during the proposed activity. | Due to the proximity of the proposed project activities to a coastal Area of Particular Concern (APC), extra care should be taken to implement all Best Management Practices during construction in accordance with the Guam-CNMI Stormwater Manual. | Water suppression, tarp coverage, or other best management practices must be implemented to control fugitive dust from renovation activities. |
| **Safe Drinking Water** | **Toxic Waste Management** | **Solid Waste Management** |
| All components of the water system should be certified lead free. • Recommended to install rooftop rain catchment to be used as water source for building if possible. • All tanks and water system fittings should be NSF 61 approved for drinking water. Any connections to CUC or other water systems should use some form of backflow prevention. | All waste generated, must be disposed according to applicable state and federal regulation | Solid Waste to be generated from the project shall be taken to Marpi Landfill or Recycling Facility. |
| **Storage Tanks** | **Site Assessment & Remediation** | **Pesticides** |
| See attached comments from DEQ TANKS Branch | See attached comments from DEQ SAR Branch | If a pre or post construction pesticide treatment is to be performed, a permit must be needed from DEQ. |

# PSS MHS Career & Technical Education Center New Construction Project – NEPA Review

| PROPERTY IDENTIFICATION: | APPLICANT NAME: | PROJECT ACTIVITY: |
|---|---|---|
| **Marianas High School (Saipan, CNMI)** | **Northern Marianas Housing Corporation (NMHC)** | **New Construction** |

1. ***Toxic/Hazardous/Radioactive, Material, Contamination, Chemical or Gases:*** That the project does not involve new development for habitation; OR the project involves new development for habitation but is not located within one mile of an NPL ("Superfund") site, within ½ mile of a CERCLIS site, nor adjacent to any other known or suspected sited contaminated with toxic chemicals or radioactive source determines it does not pose a health hazard.

## BRANCH: Site Assessment and Remediation (SAR)

**In respect to the following project site in question, there are NO concerns of that site being situated within one mile of an NPL ("Superfund") site, or within ½ mile of a CERCLIS site, nor adjacent to any other known or suspected site contaminated with toxic chemicals or radioactive sources and determines it does not pose a health hazard.**

However, there is a Formerly Used Defense Site (FUDS) located outside of the given boundaries from the project site. Although it is out of range from the project site, there is potential for unexploded ordinances (UXOs) within the area. As per records and documentations, the FUDS sites served as a battlefield during World War II and until this day, there are still ordinances found all around the island. **Precautionary safety measures should always be practiced.**

- **Chalan Kanoa Invasion Beach – Potential UXO Area**
  **Area Center Coordinates: 15° 8'35.32"N / 145° 41'37.00"E**

  The area near Chalan Kanoa was identified as a potential submerged UXO site because of the known wrecks that make up the Maritime Heritage Trail. This area is well documentedfor the historical site.

  Source: *Commonwealth of the Northern Marianas Islands Submerged Lands UXO Historical Report.* Prepared by: Unitek Environmental Guam. 29 June 2012.

**UXO Safety**

- No concerns surrounding the lots. However, the owners should take precautions in the event of any intrusive activities such as land excavations. Reason being that there could be a possibility of UXO or Unexploded Ordnance in the area. In the event UXO is discovered, work should STOP, and DFEMS be contacted.

- Even if it is indicated that there is no record of inventory there is a potential for Unexploded Ordnance (UXO) to be found in the subject site. Although, if UXO is discovered during excavation or mining activities, it is recommended that work is ceased and that the Department of Public Safety (DPS) and Department of Fire and Emergency Medical Services (DFEMS) is contacted.

- It is important that if an Unexploded Ordinance ("UXO") is encountered with the surface activities, work must stop and the Site Safety Officer must contact the Department of Fire and Emergency Medical Services ("DFEMS") at 911. DFEMS is the contact for the removal of Unexploded Ordinances that are discovered on-site.

- If UXO is frequently being discovered on the sub-surface due to land clearing activities, the need for a UXO Technician should be considered. The role of the UXO Technician is to provide safety support and monitor for any UXO during excavation activities.

    - Always remember the 3R's of UXO Safety:

        - **Recognize** – when you may have come across a munition, and that munitions are dangerous.

        - **Retreat** – do not approach, touch, move, or disturb a suspect munition, but carefully leave the area.

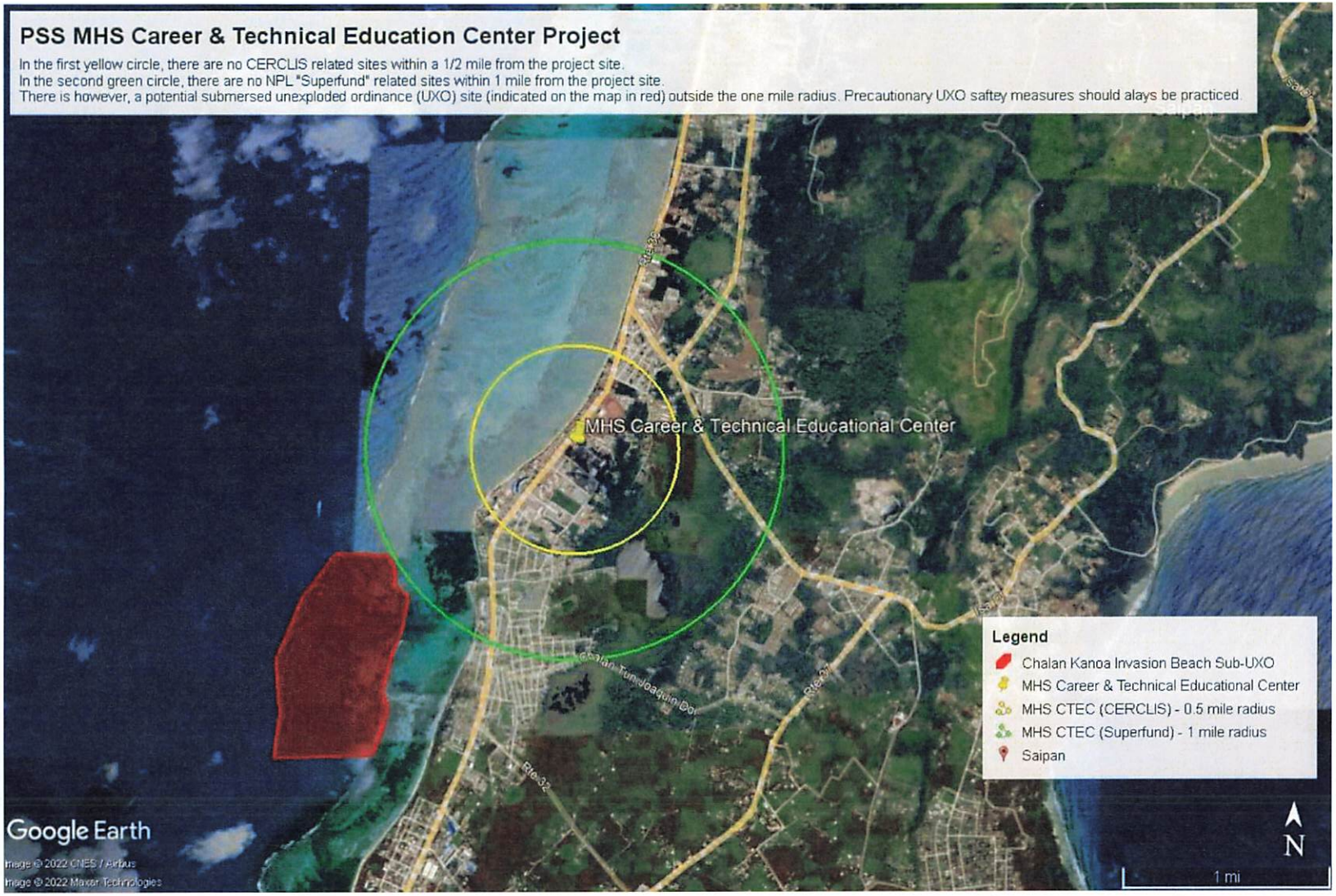
        - **Report** – immediately what you saw and where you saw it to local law enforcement – call 911.

**BECQ-DEQ - Site Assessment & Remediation Branch (SAR)**

- Joshua C. Santos (Acting Manager – Site Assessment & Remediation)
- Anthony A. Castro (Env. Specialist – Site Assessment & Remediation)

# Map

# Images


PSS MHS Career & Technical Education Center Project
In the first yellow circle, there are no CERCLIS related sites within a 1/2 mile from the project site.
In the second green circle, there are no NPL "Superfund" related sites within 1 mile from the project site.
There is however, a potential submersed unexploded ordinance (UXO) site (indicated on the map in red) outside the one mile radius. Precautionary UXO saftey measures should alays be practiced.
MHS Career & Technical Educational Center
Legend
Chalan Kanoa Invasion Beach Sub-UXO
MHS Career & Technical Educational Center
MHS CTEC (CERCLIS) - 0.5 mile radius
MHS CTEC (Superfund) - 1 mile radius
Saipan
Google Earth
Image © 2022 CNES / Airbus
Image © 2022 Maxar Technologies
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**The Northern Marians Housing Corporation (NMHC) will be undertaking the following project activities at the following Public School System (PSS) Marianas High School Career and Technical Education Center located in Susupe Village: These projects will be funded through the Community Development Block Grant-Disaster Recovery Program (CDBG-DR Program), a federally funded program from the U.S. Department of Housing and Urban Development (U.S. HUD).**

## LOT#/AREAS/VILLAGES/LOCATIONS:

| | | | |
|---|---|---|---|
| ***Lot No. 39 H 01 Susupe*** | ***Saipan, CNMI*** | ***Public School System (PSS) Marianas High School Career and Technical Education Center*** | ***New Construction Activity*** |

1. ***Explosive or Flammable Operations:*** That the project is located at an Acceptable Separation Distance (ASD) from any above-ground explosive or flammable fuels or chemicals containers according to "Siting of HUD-Assistance Projects Near Hazardous Facilities" (Appendix F, pp.51-52), ***OR*** the project will expose neither people nor building to such hazards.

2. ***Toxic/Hazardous/Radioactive, Material, Contamination, Chemical or Gases:*** That the project does not involve new development for habitation; OR the project involves new development for habitation but is not located within one mile of an NPL ("Superfund") site, within ½ mile of a CERCLIS site, nor adjacent to any other known or suspected sited contaminated with toxic chemicals or radioactive source determines it does not pose a health hazard.

## BRANCH: Storage Tanks (TANKS)

- Note within a mile an Underground Storage Tank (UST) facility is located in the area:
  - CNMI Judiciary Complex - Permit to Operate number [UST-GOV-21-002]
- Upon review of the provided scope of work the Storage Tanks Branch has no concerns in regards to the above lot#/areas/villages/locations in question at this time.


**BECQ-DEQ Storage Tanks Branch**

- Jacob T. Lizama (Manager, Storage Tanks)
- Jason Q. Reyes (Env. Technician)

## Contamination and Toxic Substances (Multifamily and Non-Residential Properties)

| General requirements | Legislation | Regulations |
|---|---|---|
| It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property. | | 24 CFR 58.5(i)(2)<br>24 CFR 50.3(i) |
| **Reference** | | |
| https://www.hudexchange.info/programs/environmental-review/site-contamination | | |

1. **How was site contamination evaluated?[1] Select all that apply.**
   - ☐ ASTM Phase I ESA
   - ☐ ASTM Phase II ESA
   - ☐ Remediation or clean-up plan
   - ☐ ASTM Vapor Encroachment Screening
   - ☒ None of the above

   → *Provide documentation and reports and include an explanation of how site contamination was evaluated in the Worksheet Summary.*
   *Continue to Question 2.*

2. **Were any on-site or nearby toxic, hazardous, or radioactive substances found that could affect the health and safety of project occupants or conflict with the intended use of the property? (Were any recognized environmental conditions or RECs identified in a Phase I ESA and confirmed in a Phase II ESA?)**

   ☒ No

   **Explain:**

[1] HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site. For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD's toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

☐ Yes.

→ *Describe the findings, including any recognized environmental conditions (RECs), in Worksheet Summary below. Continue to Question 3.*

**3. Mitigation**

Document the mitigation needed according to the requirements of the appropriate federal, state, tribal, or local oversight agency. If the adverse environmental effects cannot be mitigated, then HUD assistance may not be used for the project at this site.

**Can adverse environmental impacts be mitigated?**

☐ Adverse environmental impacts cannot feasibly be mitigated

→ Project cannot proceed at this location.

☐ Yes, adverse environmental impacts can be eliminated through mitigation.

→ *Provide all mitigation requirements[2] and documents. Continue to Question 4.*

**4. Describe how compliance was achieved. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls[3], or use of institutional controls[4].**

| |
|---|
| |

[2] Mitigation requirements include all clean-up actions required by applicable federal, state, tribal, or local law. Additionally, provide, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

[3] Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, without limitation, caps, covers, dikes, trenches, leachate collection systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, without limitation, slurry walls and ground water pumping systems.

[4] Institutional controls are mechanisms used to limit human activities at or near a contaminated site, or to ensure the effectiveness of the remedial action over time, when contaminants remain at a site at levels above the applicable remediation standard which would allow for unrestricted use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, classification exception areas, deed notices, and declarations of environmental restrictions.

**If a remediation plan or clean-up program was necessary, which standard does it follow?**

☐ Complete removal

→ *Continue to the Worksheet Summary.*

☐ Risk-based corrective action (RBCA)

→ *Continue to the Worksheet Summary.*

**Worksheet Summary**

**Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Located in Susupe, Saipan Lot # 39 H 01.
The project does not involve new development for habitation; **OR** the project involves new development for habitation, but is not located within one mile of an NPL ("Superfund") site, within ½ mile of a CERCLIS site, nor adjacent to any other known or suspected site contaminated with toxic chemicals or radioactive source determines it does not pose a health hazard.

**Are formal compliance steps or mitigation required?**

☐ Yes

☒ No

## Explosive and Flammable Hazards (CEST and EA)

| General requirements | Legislation | Regulation |
|---|---|---|
| HUD-assisted projects must meet Acceptable Separation Distance (ASD) requirements to protect them from explosive and flammable hazards. | N/A | 24 CFR Part 51 Subpart C |
| **Reference** | | |
| https://www.hudexchange.info/environmental-review/explosive-and-flammable-facilities | | |

1. **Is the proposed HUD-assisted project itself the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?**

   ☒ No

   → *Continue to Question 2.*

   ☐ Yes

   **Explain:**

   → *Go directly to Question 5.*

2. **Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?**

   ☒ No

   → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

   ☐ Yes

   → *Continue to Question 3.*

3. **Within 1 mile of the project site, are there any current *or planned* stationary aboveground storage containers that are covered by 24 CFR 51C? Containers that are NOT covered under the regulation include:**
   - **Containers 100 gallons or less in capacity, containing common liquid industrial fuels OR**
   - **Containers of liquified petroleum gas (LPG) or propane with a water volume capacity of 1,000 gallons or less that meet the requirements of the 2017 version of National Fire Protection Association (NFPA) Code 58.**

   **If all containers within the search area fit the above criteria, answer "no." For any other type of aboveground storage container within the search area that holds one of the**

**flammable or explosive materials listed in Appendix I of 24 CFR part 51 subpart C, answer "yes."**

☐ No

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide all documents used to make your determination.*

☐ Yes

→ *Continue to Question 4.*

4. **Visit HUD's website to identify the appropriate tank or tanks to assess and to calculate the required separation distance using the electronic assessment tool. To document this step in the analysis, please attach the following supporting documents to this screen:**
   - **Map identifying the tank selected for assessment, and showing the distance from the tank to the proposed HUD-assisted project site; and**
   - **Electronic assessment tool calculation of the required separation distance.**

   **Based on the analysis, is the proposed HUD-assisted project site located at or beyond the required separation distance from all covered tanks?**

   ☐ Yes

   → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

   ☐ No

   → *Go directly to Question 6.*

5. **Is the hazardous facility located at an acceptable separation distance from residences and any other facility or area where people may congregate or be present?**
   Please visit HUD's website for information on calculating Acceptable Separation Distance.

   ☐ Yes

   → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide map(s) showing the location of the project site relative to residences and any other facility or area where people congregate or are present and your separation distance calculations.*

   ☐ No

   → *Provide map(s) showing the location of the project site relative to residences and any other facility or area where people congregate or are present and your separation distance calculations.*
   *Continue to Question 6.*

6. **For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Mitigation measures may include both natural and manmade barriers, modification of the project design, burial or removal of the hazard, or other engineered solutions. Describe selected mitigation measures, including the timeline for implementation, and attach an implementation plan. If negative effects cannot be mitigated, cancel the project at this location.**
   Note that only licensed professional engineers should design and implement blast barriers. If a barrier will be used or the project will be modified to compensate for an unacceptable separation distance, provide approval from a licensed professional engineer.

| |
|---|
| |

**Worksheet Summary**

**Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

| |
|---|
| Located in Susupe, Saipan Lot No. 39 H 01.<br>The project is located at an Acceptable Separation Distance (ASD) from any above-ground explosive or flammable fuels or chemical containers according to "Siting of HUD-Assistance Projects Near Hazardous Facilities" (Appendix F, pp. 51-52), or the project will expose neither people nor building to such hazards. |

**Are formal compliance steps or mitigation required?**

☐ Yes

☒ No

## Air Quality (CEST and EA)

| General Requirements | Legislation | Regulation |
|---|---|---|
| The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP. | Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d)) | 40 CFR Parts 6, 51 and 93 |
| **Reference** | | |
| https://www.hudexchange.info/environmental-review/air-quality | | |

**Scope of Work**

1. **Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?**

   ☒ Yes

   → *Continue to Question 2.*

   ☐ No

   *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.*

**Air Quality Attainment Status of Project's County or Air Quality Management District**

2. **Is your project's air quality management district or county in non-attainment or maintenance status for any criteria pollutants?**
   Follow the link below to determine compliance status of project county or air quality management district:
   http://www.epa.gov/oaqps001/greenbk/

   ☒ No, project's county or air quality management district is in attainment status for all criteria pollutants

   → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.*

☐ Yes, project's management district or county is in non-attainment or maintenance status for one or more criteria pollutants.

Describe the findings:

| |
|---|
| |

→ *Continue to Question 3.*

3. **Determine the <u>estimated emissions levels of your project for each of those criteria pollutants</u> that are in non-attainment or maintenance status on your project area. Will your project exceed any of the *de minimis or threshold* emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?**

   ☐ No, the project will not exceed *de minimis* or threshold emissions levels or screening levels

   → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Explain how you determined that the project would not exceed de minimis or threshold emissions.*

   ☐ Yes, the project exceeds *de minimis* emissions levels or screening levels.

   → *Continue to Question 4. Explain how you determined that the project would not exceed de minimis or threshold emissions in the Worksheet Summary.*

4. **For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

| |
|---|
| |

**Worksheet Summary**

**Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Located in Susupe, Saipan Lot # 39 H 01.
The project is located within an "attainment" are, **OR** if within a "non-attainment" area, the project conforms with the EPA-approved State Implementation Plan (SIP), per contact with the State Air Quality Management District or Board.

**Are formal compliance steps or mitigation required?**

☐ Yes

☒ No

## Noise (CEST Level Reviews)

| General requirements | Legislation | Regulation |
|---|---|---|
| HUD's noise regulations protect residential properties from excessive noise exposure. HUD encourages mitigation as appropriate. | Noise Control Act of 1972<br><br>General Services Administration Federal Management Circular 75-2: "Compatible Land Uses at Federal Airfields" | Title 24 CFR 51 Subpart B |
| **References** | | |
| https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control | | |

1. **What activities does your project involve? Check all that apply:**

☐ New construction for residential use

NOTE: HUD assistance to new construction projects is generally prohibited if they are located in an Unacceptable zone, and HUD discourages assistance for new construction projects in Normally Unacceptable zones. See 24 CFR 51.101(a)(3) for further details.

→ *Continue to Question 4.*

☐ Rehabilitation of an existing residential property

NOTE: For modernization projects in all noise zones, HUD encourages mitigation to reduce levels to acceptable compliance standards. See 24 CFR 51 Subpart B for further details.

→ *Continue to Question 2.*

☐ A research demonstration project which does not result in new construction or reconstruction, interstate, land sales registration, or any timely emergency assistance under disaster assistance provisions or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

☒ None of the above

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

2. **Do you have standardized noise attenuation measures that apply to all modernization and/or minor rehabilitation projects, such as the use of double glazed windows or extra insulation?**

   ☐ Yes

   **Indicate the type of measures that will apply (check all that apply):**

   ☐ Improved building envelope components (better windows and doors, strengthened sheathing, insulation, sealed gaps, etc.)

   ☐ Redesigned building envelope (more durable or substantial materials, increased air gap, resilient channels, staggered wall studs, etc.)

   ☐ Other

   **Explain**:

   | |
   |---|
   | |

   → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below and provide any supporting documentation.*

   ☐ No

   → *Continue to Question 3.*

3. **Complete the Preliminary Screening to identify potential noise generators in the vicinity (1000' from a major road, 3000' from a railroad, or 15 miles from an airport). Describe findings of the Preliminary Screening:**

   | |
   |---|
   | |

   → *Continue to Question 6.*

4. **Complete the Preliminary Screening to identify potential noise generators in the vicinity (1000' from a major road, 3000' from a railroad, or 15 miles from an airport). Indicate the findings of the Preliminary Screening below:**

   ☐ There are no noise generators found within the threshold distances above.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing the location of the project relative to any noise generators.*

☐ Noise generators were found within the threshold distances.

→ *Continue to Question 5.*

5. **Complete the Noise Assessment Guidelines to quantify the noise exposure. Indicate the findings of the Noise Assessment below:**

☐ Acceptable: (65 decibels or less; the ceiling may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

**Indicate noise level here:** ☐

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide noise analysis, including noise level and data used to complete the analysis.*

☐ Normally Unacceptable: (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in 24 CFR 51.105(a))

**Indicate noise level here:** ☐

**Is the project in a largely undeveloped area[1]?**

☐ No

*→Your project requires completion of an Environmental Assessment (EA) pursuant to 51.104(b)(1)(i). Elevate this review to an EA-level review.*
*Provide noise analysis, including noise level and data used to complete the analysis.*
*Continue to Question 6.*

☐ Yes

*→Your project requires completion of an Environmental Impact Statement (EIS) pursuant to 51.104(b)(1)(i). Elevate this review to an EIS-level review.*
*Provide noise analysis, including noise level and data used to complete the analysis.*
*Continue to Question 6.*

[1] A largely undeveloped area means the area within 2 miles of the project site is less than 50 percent developed with urban uses or does not have water and sewer capacity to serve the project.

☐ Unacceptable: (Above 75 decibels)

**Indicate noise level here:** [ ]

***Your project requires completion of an Environmental Impact Statement (EIS) pursuant to 51.104(b)(1)(i). You may either complete an EIS or provide a waiver signed by the appropriate authority. Indicate your choice:***

☐ Convert to an EIS
→ *Provide noise analysis, including noise level and data used to complete the analysis.*
*Continue to Question 6.*

☐ Provide waiver
→ *Provide an Environmental Impact Statement waiver from the Certifying Officer or the Assistant Secretary for Community Planning and Development per 24 CFR 51.104(b)(2) and noise analysis, including noise level and data used to complete the analysis.*
*Continue to Question 6.*

6. **HUD strongly encourages mitigation be used to eliminate adverse noise impacts. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review.**

☐ Mitigation as follows will be implemented:

[ ]

→ *Provide drawings, specifications, and other materials as needed to describe the project's noise mitigation measures.*
*Continue to the Worksheet Summary.*

☐ No mitigation is necessary.
**Explain why mitigation will not be made here:**

→ *Continue to the Worksheet Summary.*

**Worksheet Summary**

**Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Located in Susupe, Saipan Lot # 39 H 01.
The project does not involve development of noise sensitive uses, **OR** the project is not within line-of-sight of an arterial roadway or railroad, **OR** ambient noise level is 65 LDN (or CNEL) or less, based upon the HUD Noise Assessment Guidelines (NAG) study for calculating noise levels.

**Are formal compliance steps or mitigation required?**

☐ Yes

☒ No

## Wetlands (CEST and EA)

| General requirements | Legislation | Regulation |
|---|---|---|
| Executive Order 11990 discourages that direct or indirect support of new construction impacting wetlands wherever there is a practicable alternative. The Fish and Wildlife Service's National Wetlands Inventory can be used as a primary screening tool, but observed or known wetlands not indicated on NWI maps must also be processed. Off-site impacts that result in draining, impounding, or destroying wetlands must also be processed. | Executive Order 11990 | 24 CFR 55.20 can be used for general guidance regarding the 8 Step Process. |
| **References** | | |
| https://www.hudexchange.info/environmental-review/wetlands-protection | | |

1. **Does this project involve new construction as defined in Executive Order 11990, expansion of a building's footprint, or ground disturbance?**
   The term "new construction" shall include draining, dredging, channelizing, filling, diking, impounding, and related activities and any structures or facilities begun or authorized after the effective date of the Order.

   ☐ No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

   ☒ Yes → *Continue to Question 2.*

2. **Will the new construction or other ground disturbance impact an on- or off-site wetland?**
   The term "wetlands" means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances does or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds. Wetlands under E.O. 11990 include isolated and non-jurisdictional wetlands.

   ☒ No, a wetland will not be impacted in terms of E.O. 11990's definition of new construction.
   → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map or any other relevant documentation to explain your determination.*

   ☐ Yes, there is a wetland that be impacted in terms of E.O. 11990's definition of new construction.

→*You must determine that there are no practicable alternatives to wetlands development by completing the 8-Step Process.*
*Provide a completed 8-Step Process as well as all documents used to make your determination, including a map. Be sure to include the early public notice and the final notice with your documentation.*
*Continue to Question 3.*

3. **For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

| |
|---|
| |

**Which of the following mitigation actions have been or will be taken? Select all that apply:**

- ☐ Permeable surfaces
- ☐ Natural landscape enhancements that maintain or restore natural hydrology through infiltration
- ☐ Native plant species
- ☐ Bioswales
- ☐ Evapotranspiration
- ☐ Stormwater capture and reuse
- ☐ Green or vegetative roofs with drainage provisions
- ☐ Natural Resources Conservation Service conservation easements
- ☐ Compensatory mitigation

**Worksheet Summary**

**Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Located in Susupe, Saipan Lot No. 39 H 01.
The project does not involve new construction within or adjacent to wetlands, marshes, wet meadows, mud flats or natural ponds per field observation and maps issued by the USDI.Fish & Wildlife Service or U.S. Corps of Engineers.

**Are formal compliance steps or mitigation required?**

☐ Yes

☒ No

U.S. Fish and Wildlife Service

# National Wetlands Inventory

## wetlands MHS CTE


February 23, 2022

**Wetlands**

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine

## Environmental Justice (CEST and EA)

| General requirements | Legislation | Regulation |
|---|---|---|
| Determine if the project creates adverse environmental impacts upon a low-income or minority community. If it does, engage the community in meaningful participation about mitigating the impacts or move the project. | Executive Order 12898 | |
| **References** | | |
| https://www.hudexchange.info/environmental-review/environmental-justice | | |

**HUD strongly encourages starting the Environmental Justice analysis only after all other laws and authorities, including Environmental Assessment factors if necessary, have been completed.**

1. **Were any adverse environmental impacts identified in any other compliance review portion of this project's total environmental review?**

   ☐Yes → *Continue to Question 2.*

   ☒No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

2. **Were these adverse environmental impacts disproportionately high for low-income and/or minority communities?**

   ☐Yes

   **Explain:**

   → *Continue to Question 3. Provide any supporting documentation.*

   ☐No

   **Explain:**

   → *Continue to the Worksheet Summary and provide any supporting documentation.*

3. **All adverse impacts should be mitigated. Explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

☐Mitigation as follows will be implemented:

| |
|---|
| |

→ *Continue to Question 4.*

☐No mitigation is necessary.

**Explain why mitigation will not be made here:**

| |
|---|
| |

→ *Continue to Question 4.*

4. **Describe how the affected low-income or minority community was engaged or meaningfully involved in the decision on what mitigation actions, if any, will be taken.**

| |
|---|
| |

→ *Continue to the Worksheet Summary and provide any supporting documentation.*

**Worksheet Summary**

**Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Located in Susupe, Saipan Lot No. 39 H 01.
The project site is suitable for its proposed use and the project won't be adversely affected by existing environmental conditions.

**Are formal compliance steps or mitigation required?**

☐ Yes

☒ No

# Appendix D

Commonwealth of the Northern Mariana Islands
Office of the Secretary of Public Works
2nd floor - Oleai Joeten Commercial Center
Saipan, MP 96950

February 18, 2022
Serial No. PW22-0182

Mr. Jonathan I. Arriola
Corporate Director
Northern Marianas Housing Corporation
Saipan, MP 96950

**Subject:** **Determination of Special Flood Hazard Area – New Career & Technical Education Center Building**

Dear Mr. Arriola:

This letter is in response to your request letter, dated January 10, 2022, for the determination of Special Flood Hazard Area for a proposed new Marianas High School Career & Technical Education Center building located in Susupe, Saipan. Lot No. 39 H 01.

After a thorough review of the Flood Insurance Rate Map (FIRM Panel No. 6900000045C) and other source materials, this office has determined that the aforementioned lot **is NOT in the Special Flood Hazard Area**. See attached map.

Should you have any questions or concerns, please do not hesitate to contact Mr. Edwin Tmarsel, Flood Administrator of our Building Safety Code Division at the telephone number 234-2726.

Sincerely,

JAMES A. ADA
Secretary of Public Works

cc: Building Safety Code Division

Tel No.: (670) 235-9570 Fax: (670) 235-6346


Special Flood Hazard Areas - Saipan
N
Legend
Location of Lot
FEMA Flood Zones
A
AE
AO
V
VE
1,000 Feet
Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

# NORTHERN MARIANAS HOUSING CORPORATION

**Community Development Block Grant – Disaster Recovery (CDBG-DR) Division**

P.O. BOX 500514, Saipan, MP 96950-0514

Email: cnmi-cdbg-dr@nmhcgov.net

Website: http://www.cnmi-cdbgdr.com

Tels: (670) 233-9447
233-9448
233-9449
233-9450

Fax: (670) 233-9452


RECEIVED
Date: 1/10/2022
Time: 3:35 PM
DPW SECRETARY'S OFFICE

January 10, 2022

Mr. James Ada
Secretary
Department of Public Works
2nd Floor JCT Bldg, San Jose
Saipan, MP 96950

Re: Request for a Determination of Effect.

Dear Secretary Ada,

The Northern Marianas Housing Corporation (NMHC) is in the process of preparing the Environmental Assessment Statutory Checklist (24 CFR § 58.35) for the proposed New Building replacing existing typhoon damaged facility for Public School System (PSS) Marianas High School Career and Technical Education Center located in Lot # 39 H 01, Susupe Village, Saipan.

The proposed project will be funded by the Department of Housing and Urban Development (HUD) through the Community Development Block Grant-Disaster Recovery Program (CDBG-DR). In order for our office to complete the Environmental Review, an Environmental Assessment Statutory Checklist (24 CFR § 58.36) must be completed. We would like to request your assistance in determining if the aforementioned lot number is located in a Special Flood Hazard Area.

If you have any questions or concerns, please contact me at drprojectmanager@nmhcgov.net or Mr. Wilfred Villagomez at projectsupervisio@nmhcgov.net or at the numbers listed above.

Sincerely,

Jonathan I Arriola
Project Manager

Enclosures: Map of Location
Scope of Work
Floor Plan


Saipan Mayor's Office
Pista de atletismo
Minachom Atdao
Ada Gym
Bwoghos St
Hotel Sun Palace
3.3 (43)
3-star hotel
Unai Chalan Kiya
Rte 30
Marianas High School
Saturday Farmer's Marke
Quadra de esportes
Biwasy Ln
Gakko Ln
Bureau Of Motor Vehicle
Commonwealth Election Commission
Sarawi Blvd
DEPARTMENT OF PUBLIC SAFETY
Public Defenders Ofc
Joeten-Kiyu Public Library
Texas Rd
Tekken St
Peska Ln
Ace Hardware
Hardware store

## Flood Insurance (CEST and EA)

| General requirements | Legislation | Regulation |
|---|---|---|
| Certain types of federal financial assistance may not be used in floodplains unless the community participates in National Flood Insurance Program and flood insurance is both obtained and maintained. | Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128) | 24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.1(b). |
| **Reference** | | |
| https://www.hudexchange.info/environmental-review/flood-insurance | | |

1. **Does this project involve mortgage insurance, refinance, acquisition, repairs, construction, or rehabilitation of a structure, mobile home, or insurable personal property?**

   ☒No. This project does not require flood insurance or is excepted from flood insurance. → *Continue to the Worksheet Summary.*

   ☐Yes → *Continue to Question 2.*

2. **Provide a FEMA/FIRM map showing the site.**

   The Federal Emergency Management Agency (FEMA) designates floodplains. The FEMA Map Service Center provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs). For projects in areas not mapped by FEMA, use the best available information to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site. Provide FEMA/FIRM floodplain zone designation, panel number, and date within your documentation.

   **Is the structure, part of the structure, or insurable property located in a FEMA-designated Special Flood Hazard Area?**

   ☐No → *Continue to the Worksheet Summary.*

   ☐Yes → *Continue to Question 3.*

3. **Is the community participating in the National Flood Insurance Program *or* has less than one year passed since FEMA notification of Special Flood Hazards?**

   ☐Yes, the community is participating in the National Flood Insurance Program.

   For loans, loan insurance or loan guarantees, flood insurance coverage must be continued for the term of the loan. For grants and other non-loan forms of financial assistance, flood insurance coverage must be continued for the life of the building irrespective of the transfer of ownership. The amount of coverage must equal the total project cost or the maximum coverage limit of the National Flood Insurance Program, whichever is less

Provide a copy of the flood insurance policy declaration or a paid receipt for the current annual flood insurance premium and a copy of the application for flood insurance.

→ *Continue to the Worksheet Summary.*

☐Yes, less than one year has passed since FEMA notification of Special Flood Hazards. If less than one year has passed since notification of Special Flood Hazards, no flood Insurance is required.

→ *Continue to the Worksheet Summary.*

☐No. The community is not participating, or its participation has been suspended.

Federal assistance may not be used at this location. Cancel the project at this location.

**Worksheet Summary**

**Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Located in Susupe, Saipan Lot # 39 H 01.
There are no Flood Insurance for Public Infrastructures.

**Are formal compliance steps or mitigation required?**

☐ Yes

☒ No

## Floodplain Management (CEST and EA)

| General Requirements | Legislation | Regulation |
|---|---|---|
| Executive Order 11988, Floodplain Management, requires Federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable. | Executive Order 11988 | 24 CFR 55 |
| **Reference** | | |
| https://www.hudexchange.info/environmental-review/floodplain-management | | |

1. **Does 24 CFR 55.12(c) exempt this project from compliance with HUD's floodplain management regulations in Part 55?**

   ☐ Yes

   **Provide the applicable citation at 24 CFR 55.12(c) here. If project is exempt under 55.12(c)(7) or (8), provide supporting documentation.**

   → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

   ☒ No → *Continue to Question 2.*

2. **Provide a FEMA/FIRM or ABFE map showing the site.**

   The Federal Emergency Management Agency (FEMA) designates floodplains. The FEMA Map Service Center provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs) or Advisory Base Flood Elevations (ABFEs). For projects in areas not mapped by FEMA, use the best available information to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site.

   **Does your project occur in a floodplain?**

   ☒ No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

   ☐ Yes

   **Select the applicable floodplain using the FEMA map or the best available information:**

   ☐ Floodway → *Continue to Question 3, Floodways*

☐ Coastal High Hazard Area (V Zone) → *Continue to Question 4, Coastal High Hazard Areas*

☐ 500-year floodplain (B Zone or shaded X Zone) → *Continue to Question 5, 500-year Floodplains*

☐ 100-year floodplain (A Zone) → *The 8-Step Process is required. Continue to Question 6, 8-Step Process*

3. **Floodways**

**Is this a functionally dependent use?**

☐ Yes

The 8-Step Process is required. Work with your HUD FEO to determine a way to satisfactorily continue with this project. Provide a completed 8-Step Process, including the early public notice and the final notice.

→*Continue to Question 6, 8-Step Process*

☐ No

Federal assistance may not be used at this location *unless a 55.12(c) exception applies.* You must either choose an alternate site or cancel the project at this location.

4. **Coastal High Hazard Area**

**Is this a critical action?**

☐ Yes

Critical actions are prohibited in coastal high hazard areas. Federal assistance may not be used at this location. Unless the action is excepted at 24 CFR 55.12(c), you must either choose an alternate site or cancel the project.

☐ No

**Does this action include construction that is not a functionally dependent use, existing construction (including improvements), or reconstruction following destruction caused by a disaster?**

☐ Yes, there is new construction.

New construction is prohibited in V Zones ((24 CFR 55.1(c)(3)).

☐ No, this action concerns only a functionally dependent use, existing construction(including improvements), or reconstruction following destruction caused by a disaster.

This construction must have met FEMA elevation and construction standards for a coastal high hazard area or other standards applicable at the time of construction.

→ *Continue to Question 6, 8-Step Process*

5. **500-year Floodplain**
   **Is this a critical action?**
   ☐ No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

   ☐Yes → *Continue to Question 6, 8-Step Process*

6. **8-Step Process**.
   **Does the 8-Step Process apply? Select one of the following options:**
   ☐ 8-Step Process applies.
   Provide a completed 8-Step Process, including the early public notice and the final notice.
   → *Continue to Question 7, Mitigation*

   ☐ 5-Step Process is applicable per 55.12(a)(1-3).
   Provide documentation of 5-Step Process.
   Select the applicable citation:
   - ☐ *55.12(a)(1)* HUD actions involving the disposition of HUD-acquired multifamily housing projects or "bulk sales" of HUD-acquired one- to four-family properties in communities that are in the Regular Program of the National Flood Insurance Program (NFIP) and in good standing (i.e., not suspended from program eligibility or placed on probation under 44 CFR 59.24).
   - ☐ *55.12(a)(2)* HUD's actions under the National Housing Act (12 U.S.C. 1701) for the purchase or refinancing of existing multifamily housing projects, hospitals, nursing homes, assisted living facilities, board and care facilities, and intermediate care facilities, in communities that are in good standing under the NFIP.
   - ☐ *55.12(a)(3)* HUD's or the recipient's actions under any HUD program involving the repair, rehabilitation, modernization, weatherization, or improvement of existing multifamily housing projects, hospitals, nursing homes, assisted living facilities, board and care facilities, intermediate care facilities, and one- to four-family properties, in communities that are in the Regular Program of the National Flood Insurance Program (NFIP) and are in good standing, provided that the number of units is not increased more than 20 percent, the action does not involve a conversion from nonresidential to residential land use, the action does not meet the thresholds for "substantial improvement" under § 55.2(b)(10), and the footprint of the structure and paved areas is not significantly increased.
   - ☐ *55.12(a)(4)* HUD's (or the recipient's) actions under any HUD program involving the repair, rehabilitation, modernization, weatherization, or improvement of existing nonresidential buildings and structures, in communities that are in the

Regular Program of the NFIP and are in good standing, provided that the action does not meet the thresholds for "substantial improvement" under § 55.2(b)(10) and that the footprint of the structure and paved areas is not significantly increased.

→ *Continue to Question 7, Mitigation*

☐ 8-Step Process is inapplicable per 55.12(b)(1-4).

Select the applicable citation:

☐ *55.12(b)(1)* HUD's mortgage insurance actions and other financial assistance for the purchasing, mortgaging or refinancing of existing one- to four-family properties in communities that are in the Regular Program of the National Flood Insurance Program (NFIP) and in good standing (i.e., not suspended from program eligibility or placed on probation under 44 CFR 59.24), where the action is not a critical action and the property is not located in a floodway or coastal high hazard area.

☐ *55.12(b)(2)* Financial assistance for minor repairs or improvements on one- to four-family properties that do not meet the thresholds for "substantial improvement" under § 55.2(b)(10)

☐ *55.12(b)(3)* HUD actions involving the disposition of individual HUD-acquired, one-to four-family properties.

☐ *55.12(b)(4)* HUD guarantees under the Loan Guarantee Recovery Fund Program (24 CFR part 573) of loans that refinance existing loans and mortgages, where any new construction or rehabilitation financed by the existing loan or mortgage has been completed prior to the filing of an application under the program, and the refinancing will not allow further construction or rehabilitation, nor result in any physical impacts or changes except for routine maintenance.

☐ *55.12(b)(5)* The approval of financial assistance to lease an existing structure located within the floodplain, but only if—

(i) The structure is located outside the floodway or Coastal High Hazard Area, and is in a community that is in the Regular Program of the NFIP and in good standing (i.e., not suspended from program eligibility or placed on probation under 44 CFR 59.24);

(ii) The project is not a critical action; and

(iii) The entire structure is or will be fully insured or insured to the maximum under the NFIP for at least the term of the lease.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

**7. <u>Mitigation</u>**

**For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

**Which of the following mitigation/minimization measures have been identified for this project in the 8-Step or 5-Step Process? Select all that apply.**

- ☐ Permeable surfaces
- ☐ Natural landscape enhancements that maintain or restore natural hydrology
- ☐ Planting or restoring native plant species
- ☐ Bioswales
- ☐ Evapotranspiration
- ☐ Stormwater capture and reuse
- ☐ Green or vegetative roofs with drainage provisions
- ☐ Natural Resources Conservation Service conservation easements or similar easements
- ☐ Floodproofing of structures
- ☐ Elevating structures including freeboarding above the required base flood elevations
- ☐ Other

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

**Worksheet Summary**

**Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Located in Susupe, Saipan Lot No. 39 H 01.

The Department of Public Works has determined that the project is NOT in the Special Flood Hazard Area.

**Are formal compliance steps or mitigation required?**

☐ Yes

☒ No

# Appendix E

Commonwealth of the Northern Mariana Islands
Division of Fish & Wildlife
Department of Lands and Natural Resources
Lower Base, P.O. Box 10007
Saipan, MP 96950

Telephone: 670-664-6000
Fax: 670-664-6060

October 31, 2019

Jackie Quitugua
Acting Commissioner of Education
PO Box 501730
Saipan, MP 96950

Subject: Information Request (#IR-20-02), Building T Reconstruction

Dear Ms. Quitugua:
You requested information from the Division of Fish and Wildlife regarding the potential impacts on threatened and endangered (T&E) species from the proposed rebuilding of Building T north, central, and south along Beach Road at the Marianas High School campus. We reviewed your information request, including supporting information and maps.

Based on the information provided, the site does not contain any habitat for T&E species, and we do not anticipate impacts to T&E species from this project. In addition, this project does not require a future permit or clearance from DFW. Our response is based solely on the information you provided, our current records, and professional experience.

If you have any questions, or I can be of further assistance, please don't hesitate to contact me at 664-6017.

Sincerely,

Jill Liske-Clark
Wildlife Section Supervisor

Cc: Manny M. Pangelinan, Director, DFW

## Endangered Species Act (CEST and EA)

| General requirements | ESA Legislation | Regulations |
|---|---|---|
| Section 7 of the Endangered Species Act (ESA) mandates that federal agencies ensure that actions that they authorize, fund, or carry out shall not jeopardize the continued existence of federally listed plants and animals or result in the adverse modification or destruction of designated critical habitat. Where their actions may affect resources protected by the ESA, agencies must consult with the Fish and Wildlife Service and/or the National Marine Fisheries Service ("FWS" and "NMFS" or "the Services"). | The Endangered Species Act of 1973 (16 U.S.C. 1531 *et seq.*); particularly section 7 (16 USC 1536). | 50 CFR Part 402 |
| **References** | | |
| https://www.hudexchange.info/environmental-review/endangered-species | | |

1. **Does the project involve any activities that have the potential to affect species or habitats?**

☒No, the project will have No Effect due to the nature of the activities involved in the project.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.*

☐No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office.

Explain your determination:

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.*

☐Yes, the activities involved in the project have the potential to affect species and/or habitats. → *Continue to Question 2.*

2. **Are federally listed species or designated critical habitats present in the action area?**

Obtain a list of protected species from the Services. This information is available on the FWS Website or you may contact your local FWS and/or NMFS offices directly.

☐No, the project will have No Effect due to the absence of federally listed species and designated critical habitat.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination. Documentation*

*may include letters from the Services, species lists from the Services' websites, surveys or other documents and analysis showing that there are no species in the action area.*

☐Yes, there are federally listed species or designated critical habitats present in the action area. → *Continue to Question 3.*

**3. What effects, if any, will your project have on federally listed species or designated critical habitat?**

☐No Effect: Based on the specifics of both the project and any federally listed species in the action area, you have determined that the project will have absolutely no effect on listed species or critical habitat.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination. Documentation should include a species list and explanation of your conclusion, and may require maps, photographs, and surveys as appropriate.*

☐May Affect, Not Likely to Adversely Affect: Any effects that the project may have on federally listed species or critical habitats would be beneficial, discountable, or insignificant.

→ *Continue to Question 4, Informal Consultation.*

☐Likely to Adversely Affect: The project may have negative effects on one or more listed species or critical habitat.

→ *Continue to Question 5, Formal Consultation.*

**4. Informal Consultation is required**

Section 7 of ESA (16 USC. 1536) mandates consultation to resolve potential impacts to endangered and threatened species and critical habitats. If a HUD-assisted project may affect any federally listed endangered or threatened species or critical habitat, then compliance is required with Section 7. See 50 CFR Part 402 Subpart B Consultation Procedures.

**Did the Service(s) concur with the finding that the project is Not Likely to Adversely Affect?**

☐Yes, the Service(s) concurred with the finding.

→ *Based on the response, the review is in compliance with this section. Continue to Question 6 and provide the following:*

*(1) A biological evaluation or equivalent document*
*(2) Concurrence(s) from FWS and/or NMFS*
*(3) Any other documentation of informal consultation*

*Exception: If finding was made based on procedures provided by a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office, provide whatever documentation is mandated by that agreement.*

☐No, the Service(s) did not concur with the finding. → *Continue to Question 5.*

5. **Formal consultation is required**
   Section 7 of ESA (16 USC 1536) mandates consultation to resolve potential impacts to federally listed endangered and threatened species and critical habitats. If a HUD assisted project may affect any endangered or threatened species or critical habitat, then compliance is required with Section 7. See 50 CFR Part 402 Subpart B Consultation Procedures.

   → *Once consultation is complete, the review is in compliance with this section. Continue to Question 6 and provide the following:*
   *(1) A biological assessment, evaluation, or equivalent document*
   *(2) Biological opinion(s) issued by FWS and/or NMFS*
   *(3) Any other documentation of formal consultation*

6. **For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the proposed measures that will be implemented to mitigate for the impact or effect, including the timeline for implementation.**
   ☐Mitigation as follows will be implemented:

| |
|---|
| |

   ☐No mitigation is necessary.
   **Explain why mitigation will not be made here:**

| |
|---|
| |

**Worksheet Summary**

**Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

| |
|---|
| Project is located in Susupe, Saipan Lot No. 39 H 01.<br>The site does not contain any habitat for T&E species, and we do not anticipate impacts to T&E species from this project. |

**Are formal compliance steps or mitigation required?**

☐ Yes

☒ No

# Appendix F

# NORTHERN MARIANAS HOUSING CORPORATION

**Community Development Block Grant – Disaster Recovery (CDBG-DR) Division**

P.O. BOX 500514, Saipan, MP 96950-0514

Email: cnmi-cdbg-dr@nmhcgov.net

Website: http://www.cnmi-cdbgdr.com

Tels: (670) 233-9447
233-9448
233-9449
233-9450
Fax: (670) 233-9452


January 10, 2022

Ms. Pamela Sablan
District Conservationist
Natural Resource Conservation Service
P.O. Box 5082-CHRB
Saipan, MP 96950

Re: Request for a Determination of Effect.

Dear Ms. Sablan,

The Northern Marianas Housing Corporation (NMHC) is in the process of preparing the Environmental Assessment Statutory Checklist (24 CFR § 58.35) for the proposed New Building replacing existing typhoon damaged facility for Public School System (PSS) Marianas High School Career and Technical Education Center located in Lot # 39 H 01, Susupe Village, Saipan.

The proposed project will be funded by the Department of Housing and Urban Development (HUD) through the Community Development Block Grant-Disaster Recovery Program (CDBG-DR). In order for our office to complete the Environmental Review, an Environmental Assessment Statutory Checklist (24 CFR § 58.35) must be completed. We kindly request a Determination of Effect based on HUD requirement on the Farmland Protection Policy Act of 1981, particularly sections 1504 (b) and 1541; 7 CFR Part 658.

If you have any questions or concerns, please contact me at drprojectmanager@nmhcgov.net or Mr. Wilfred Villagomez at projectsupervisio@nmhcgov.net or at the numbers listed above.

Sincerely,

Jonathan I. Arriola
Project Manager

Enclosures: Map of Location
Scope of Work
Floor Plan

01/11/2022 SDV
RECEIVED

U.S. Department of Agriculture

# FARMLAND CONVERSION IMPACT RATING

| | | | |
|---|---|---|---|
| **PART I** *(To be completed by Federal Agency)* | | Date Of Land Evaluation Request | |
| Name of Project Marianas High School CTE Building | | Federal Agency Involved NMHC-CDBG-DR-HUD | |
| Proposed Land Use School Typhoon Repair/Replacement | | County and State Saipan, MP 96950 | |
| **PART II** *(To be completed by NRCS)* | | Date Request Received By NRCS 11 Jan 2022 | Person Completing Form: S. Takai |
| Does the site contain Prime, Unique, Statewide or Local Important Farmland? *(If no, the FPPA does not apply - do not complete additional parts of this form)* | YES ☐ NO ☑ | Acres Irrigated | Average Farm Size |
| Major Crop(s) | Farmable Land In Govt. Jurisdiction Acres: % | Amount of Farmland As Defined in FPPA Acres: % | |
| Name of Land Evaluation System Used | Name of State or Local Site Assessment System | Date Land Evaluation Returned by NRCS | |

| **PART III** *(To be completed by Federal Agency)* | Alternative Site Rating | | | |
|---|---|---|---|---|
| | Site A | Site B | Site C | Site D |
| A. Total Acres To Be Converted Directly | | | | |
| B. Total Acres To Be Converted Indirectly | | | | |
| C. Total Acres In Site | | | | |
| **PART IV** *(To be completed by NRCS)* Land Evaluation Information | | | | |
| A. Total Acres Prime And Unique Farmland | | | | |
| B. Total Acres Statewide Important or Local Important Farmland | | | | |
| C. Percentage Of Farmland In County Or Local Govt. Unit To Be Converted | | | | |
| D. Percentage Of Farmland In Govt. Jurisdiction With Same Or Higher Relative Value | | | | |
| **PART V** (To be completed by NRCS) Land Evaluation Criterion Relative Value of Farmland To Be Converted (Scale of 0 to 100 Points) | | | | |
| **PART VI** *(To be completed by Federal Agency)* Site Assessment Criteria *(Criteria are explained in 7 CFR 658.5 b. For Corridor project use form NRCS-CPA-106)* | Maximum Points | Site A | Site B | Site C | Site D |
| 1. Area In Non-urban Use | (15) | | | | |
| 2. Perimeter In Non-urban Use | (10) | | | | |
| 3. Percent Of Site Being Farmed | (20) | | | | |
| 4. Protection Provided By State and Local Government | (20) | | | | |
| 5. Distance From Urban Built-up Area | (15) | | | | |
| 6. Distance To Urban Support Services | (15) | | | | |
| 7. Size Of Present Farm Unit Compared To Average | (10) | | | | |
| 8. Creation Of Non-farmable Farmland | (10) | | | | |
| 9. Availability Of Farm Support Services | (5) | | | | |
| 10. On-Farm Investments | (20) | | | | |
| 11. Effects Of Conversion On Farm Support Services | (10) | | | | |
| 12. Compatibility With Existing Agricultural Use | (10) | | | | |
| TOTAL SITE ASSESSMENT POINTS | 160 | 0 | 0 | 0 | 0 |
| **PART VII** *(To be completed by Federal Agency)* | | | | | |
| Relative Value Of Farmland *(From Part V)* | 100 | 0 | 0 | 0 | 0 |
| Total Site Assessment *(From Part VI above or local site assessment)* | 160 | 0 | 0 | 0 | 0 |
| **TOTAL POINTS** *(Total of above 2 lines)* | 260 | 0 | 0 | 0 | 0 |

| | | |
|---|---|---|
| Site Selected: | Date Of Selection | Was A Local Site Assessment Used? YES ☐ NO ☐ |

Reason For Selection:

Name of Federal agency representative completing this form: Pamela M. Sablan, District Conservationist — Date: 11 JAN 2022

*(See Instructions on reverse side)*

Form AD-1006 (03-02)

# Prime and Unique Farmlands Map

USDA-NRCS
Map Prepared by Pamela M. Sablan, District Conservationist - 01/11/2022
Response to Categorically Excluded Statutory Checklist
"Public School System- Marianas High School Career & Technical Education Center - New Building - Susupe, Saipan"


Prepared with assistance from USDA-Natural Resources Conservation Service

0 200 400 800 Feet

**Project Location**

# Appendix G

## Wild and Scenic Rivers (CEST and EA)

| General requirements | Legislation | Regulation |
|---|---|---|
| The Wild and Scenic Rivers Act provides federal protection for certain free-flowing, wild, scenic and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS) from the effects of construction or development. | The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c)) | 36 CFR Part 297 |
| **References** | | |
| https://www.hudexchange.info/environmental-review/wild-and-scenic-rivers | | |

1. **Is your project within proximity of a NWSRS river as defined below?**
   **Wild & Scenic Rivers:** These rivers or river segments have been designated by Congress or by states (with the concurrence of the Secretary of the Interior) as wild, scenic, or recreational
   Study Rivers: These rivers or river segments are being studied as a potential component of the Wild & Scenic River system.
   Nationwide Rivers Inventory (NRI): The National Park Service has compiled and maintains the NRI, a register of river segments that potentially qualify as national wild, scenic, or recreational river areas

   ☒ No
   → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination, such as a map identifying the project site and its surrounding area or a list of rivers in your region in the Screen Summary at the conclusion of this screen.*

   ☐ Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.
   → *Continue to Question 2.*

2. **Could the project do *any* of the following?**
   - Have a direct and adverse effect within Wild and Scenic River Boundaries,
   - Invade the area or unreasonably diminish the river outside Wild and Scenic River Boundaries, or
   - Have an adverse effect on the natural, cultural, and/or recreational values of a NRI segment.

Consultation with the appropriate federal/state/local/tribal Managing Agency(s) is required, pursuant to Section 7 of the Act, to determine if the proposed project may have an adverse effect on a Wild & Scenic River or a Study River and, if so, to determine the appropriate avoidance or mitigation measures.
Note: Concurrence may be assumed if the Managing Agency does not respond within 30 days; however, you are still obligated to avoid or mitigate adverse effects on the rivers identified in the NWSRS

☐ No, the Managing Agency has concurred that the proposed project will not alter, directly, or indirectly, any of the characteristics that qualifies or potentially qualifies the river for inclusion in the NWSRS.

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation of the consultation (including the Managing Agency's concurrence) and any other documentation used to make your determination.*

☐ Yes, the Managing Agency was consulted and the proposed project may alter, directly, or indirectly, any of the characteristics that qualifies or potentially qualifies the river for inclusion in the NWSRS.

→ *Continue to Question 3.*

3. **For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

| |
|---|
| |

→ *Continue to the Worksheet Summary below. Provide documentation of the consultation (including the Managing Agency's concurrence) and any other documentation used to make your determination.*

**Worksheet Summary**

**Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Project is located in Susupe, Saipan Lot# 39 H 01.
There are no wild or scenic rivers located in the CNMI.

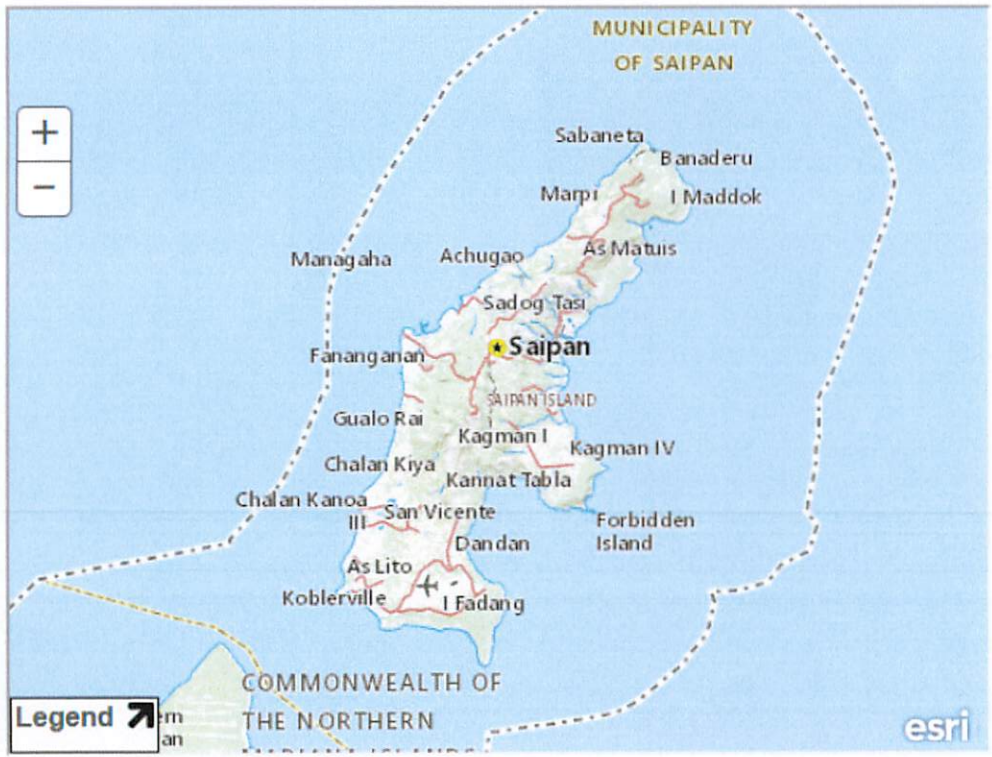
**Are formal compliance steps or mitigation required?**

☐ Yes

☒ No

# HAWAII

Hawaii has approximately 3,905 miles of river, but no designated wild & scenic rivers.




+ View larger map

Hawaii does not have any designated rivers.

## EXPLORE DESIGNATED RIVERS

Choose A State Go

Choose A River Go

*Dark and foreboding one minute, sun-drenched and exploding with color the next, tropical rivers span every mood.*

# Appendix H

## Sole Source Aquifers (CEST and EA)

| General requirements | Legislation | Regulation |
|---|---|---|
| The Safe Drinking Water Act of 1974 protects drinking water systems which are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health. | Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349) | 40 CFR Part 149 |
| **Reference** | | |
| https://www.hudexchange.info/environmental-review/sole-source-aquifers | | |

1. **Does your project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?**

   ☒Yes → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.*

   ☐No → *Continue to Question 2.*

2. **Is the project located on a sole source aquifer (SSA)[1]?**

   ☐No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination, such as a map of your project (or jurisdiction, if appropriate) in relation to the nearest SSA and its source area.*

   ☐Yes → *Continue to Question 3.*

3. **Does your region have a memorandum of understanding (MOU) or other working agreement with EPA for HUD projects impacting a sole source aquifer?**

   Contact your Field or Regional Environmental Officer or visit the HUD webpage at the link above to determine if an MOU or agreement exists in your area.

   ☐Yes → *Provide the MOU or agreement as part of your supporting documentation. Continue to Question 4.*

   ☐No → *Continue to Question 5.*

4. **Does your MOU or working agreement exclude your project from further review?**

   ☐Yes → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination and document where your project fits within the MOU or agreement.*

---

[1] A sole source aquifer is defined as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. This includes streamflow source areas, which are upstream areas of losing streams that flow into the recharge area.

☐No → *Continue to Question 5.*

5. **Will the proposed project contaminate the aquifer and create a significant hazard to public health?**
   Consult with your Regional EPA Office. Your consultation request should include detailed information about your proposed project and its relationship to the aquifer and associated streamflow source area. EPA will also want to know about water, storm water and waste water at the proposed project. Follow your MOU or working agreement or contact your Regional EPA office for specific information you may need to provide. EPA may request additional information if impacts to the aquifer are questionable after this information is submitted for review.

   ☐No → *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide your correspondence with the EPA and all documents used to make your determination.*

   ☐Yes → *Work with EPA to develop mitigation measures. If mitigation measures are approved, attach correspondence with EPA and include the mitigation measures in your environmental review documents and project contracts. If EPA determines that the project continues to pose a significant risk to the aquifer, federal financial assistance must be denied. Continue to Question 6.*

6. **In order to continue with the project, any threat must be mitigated, and all mitigation must be approved by the EPA. Explain in detail the proposed measures that can be implemented to mitigate for the impact or effect, including the timeline for implementation.**

   | |
   |---|
   | |

   → *Continue to the Worksheet Summary below. Provide documentation of the consultation (including the Managing Agency's concurrence) and any other documentation used to make your determination.*

**Worksheet Summary**

**Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Project is located in Susupe, Saipan Lot# 39 H 01.
The CNMI has no Sole Source Aquifers.

**Are formal compliance steps or mitigation required?**

☐ Yes

☒ No

Sole Source Aquifers

# Appendix I

*Commonwealth of the Northern Mariana Islands*
*Historic Preservation Office*
*Department of Community & Cultural Affairs*
*Caller Box 10007*
*Saipan, MP 96950*

*TEL: 664-2120-25*
*FAX: 664-2139*

# MEMORANDUM

December 23, 2020

Serial: 34158
File: 6.10.20.276 (FY'2018, R/C – 030-SNC)
DEQ Appl. No.: 2020-SNC-144G **(Post Archaeological Inventory Survey)**

**TO:** Director, Division of Environmental Quality

**FROM:** State Historic Preservation Officer

**SUBJECT: Historic Preservation Office's Review of Public School System's (c/o Dr. Alfred Ada - Commissioner) proposed Marianas High School's Career and Technical Education Center, Susupe area**

An Archaeological Inventory Survey work was conducted and completed at Marianas High School project site by Dr. Mike Dega (Advance Archaeology firm) on Tuesday and Wednesday, 27 & 28 October 2020 on the above subject proposed project as an HPO recommended conditions requirement on the HPO's initial One Start Permit Application review **(Serial No. 33817)**.

As a result of this archaeological inventory survey work, it appears the project area contains vast presence of Latte period cultural deposit that requires full-time archaeological monitoring during construction of the CTE building footings. The deposit occurred in 90% of the excavated trenches and would be expected in most of the proposed footings.

Given this consideration and to ensure that this proposed undertaking will not adversely impact potential intact archaeological and historical resources that may be associated with this site that were not recovered during previous archaeological testing works, HPO would like to include the following conditions on this project.

1. **In order to mitigate project related impacts, the permittee is required to hire a professional archaeologist who meets the qualifications published in the "Secretary of the Interior's Standards 36 CFR Part 61" to conduct archaeological monitoring**

**and data recovery procedures where the building footings are to occur during construction of the CTE's general building footprint.**

2. **The permittee must submit a research design for the monitoring and data recovery work activities prepared by a professional archaeologist and submit this document to our office for review and approval that specifies research objectives, archival background information, field and laboratory methodologies, disposition of finds, preservation issues, qualifications of personnel involved, and the ownership of finds.**

3. **The archaeological work should not begin until the research design and archaeological survey and data recovery work plan have been reviewed and approved by the Historic Preservation Office.**

4. **Should significant unanticipated historic and/or archaeological deposits or features be discovered during the project's earthmoving activities, the permittee is required to notify the Historic Preservation Office for consultation and /or development of appropriate mitigation measures.**

5. **In the event that prehistoric (Chamorro) human remains are removed during the course of the general excavation and archaeological and data recovery work activities, the permittee is required to work in consultation with the Historic Preservation Office in locating/designating an appropriate area within the general project site for the re-interment of these remains.**

6. **All cost for the mitigation and re-interment shall be borne by the permittee.**

7. **The permittee shall comply with the above HPO conditions. Failure to comply with these conditions will result in a violation upon which a fine may be assessed.**

The inclusion of these conditions satisfy HPO's concerns regarding this project.

Rita Chong-Dela Cruz

February 10, 2021

Ms. Rowena DeFato
Seatttle Regional Environmental Officer
U.S. Department of Commerce
Economic Development Administration
915 Second Avenue Room 1890
Seattle, Washington 98174

Ref: *Proposed Construction of the Marianas High School Career and Technical Education Instructional Center*
*Island of Saipan, Commonwealth of the Northern Marianas Islands*
*ACHP Project Number: 16446*

Dear Ms. DeFato:

On January 15, 2021, the Advisory Council on Historic Preservation (ACHP) received your notification and supporting documentation regarding the potential adverse effects of the referenced undertaking on a property or properties listed or eligible for listing in the National Register of Historic Places. Because the ACHP did not respond within 15 days with a decision regarding our non-participation, the ACHP assumes that the Economic Development Administration continued the consultation to resolve adverse effects.

However, if we receive a request for participation from the State Historic Preservation Officer, Tribal Historic Preservation Officer, affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Should the undertaking's circumstances change, consulting parties cannot come to consensus, or you need further advisory assistance to conclude the consultation process, please contact us.

Pursuant to 36 CFR §800.6(b)(1)(iv), you will need to file the final Section 106 agreement document (Agreement), developed in consultation with the Commonwealth of the Northern Mariana Islands Historic Preservation Office and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the Agreement and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

If you have any questions or require our further assistance, please contact Mr. Anthony Guy Lopez at 202-517-0220 or by e-mail at alopez@achp.gov and reference the ACHP Project Number above.

Sincerely,

LaShavio Johnson

LaShavio Johnson
Historic Preservation Technician
Office of Federal Agency Programs

AA1014MDR-1

# PLANNING DOCUMENT
# FOR ARCHAEOLOGICAL MONITORING AND DATA RECOVERY OF BUILDING FOOTINGS FOR THE MARIANAS HIGH SCHOOL CAREER AND TECHNICAL EDUCATION (CTE) CENTER, SUSUPE, SAIPAN
# COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

**Prepared by**
**Michael Dega, Ph.D.**

**January 2021**

**Prepared for**
**Commonwealth of the Northern Mariana Islands**
**Public School System**
**P.O. Box 501370**
**Saipan, MP 96950**

Applied Archaeology

1108 Auahi Street #1303 Honolulu, HI 96814

# TABLE OF CONTENTS



# LIST OF FIGURES

## INTRODUCTION

At the request of the Commonwealth of the Northern Mariana Islands Public School System (PSS), Applied Archaeology, Inc. (AA) has prepared this archaeological monitoring and data recovery plan in advance of proposed construction for the Mariana High School Career and Technical Education (CTE) center in Susupe, Saipan, Commonwealth of the Northern Mariana Islands (CNMI) (Figures 1, 2, and 3). Archaeological inventory survey was recently conducted for this project (Dega 2020) which led to the documentation of Site SP-1-1034, a Latte period cultural deposit occurring in 18 of the 20 test trenches. The cultural deposit contained few artifacts, ecofacts, or shell but was dated to AD 1274-1320 (676-630 cal BP). The area of the CTE center appears to be a portion of Site SP-1-1034, previously documented more inland and yielding both pre-Latte and Latte period deposits (Harper et al. 2017).

The area of potential effect (APE) for this project occurs in a highly sensitive area, given the results of the AIS work as well as other archaeological projects in the area. While disturbance in the CTE center area is common, a Latte cultural deposit is present throughout the area, particularly between the average 0.30 and 0.61 meters below surface (mbs). Sterile beach sand occurs below the Latte layer. The footings for the new CTE building will extend to at least 0.91 mbs.

Ultimately, the goal of the project is to assess the presence/absence of significant cultural resources in the APE and if so, to properly mitigate their adverse effect. The AIS was done in locations approximating the columns needed to be excavated for this project. As such, there is a very high likelihood that the Site SP-1-1034 Latte layer will be encountered again during monitoring. No burials were identified during the AIS work.

The project involves construction of a new two-story building with a base footprint of 25,000 sq. ft (0.57 acres, 0.23 hectare). The two-story building will utilize an existing concrete slab which shall serve as the ground floor slab of the new building. New footings will be built for the new structure and requires archaeological work to assess the presence/absence of historic properties, including burials, in the new footings.


**Figure 1: Area of Potential Effect on Portion of Saipan Topographic Map (USGS 2005).**

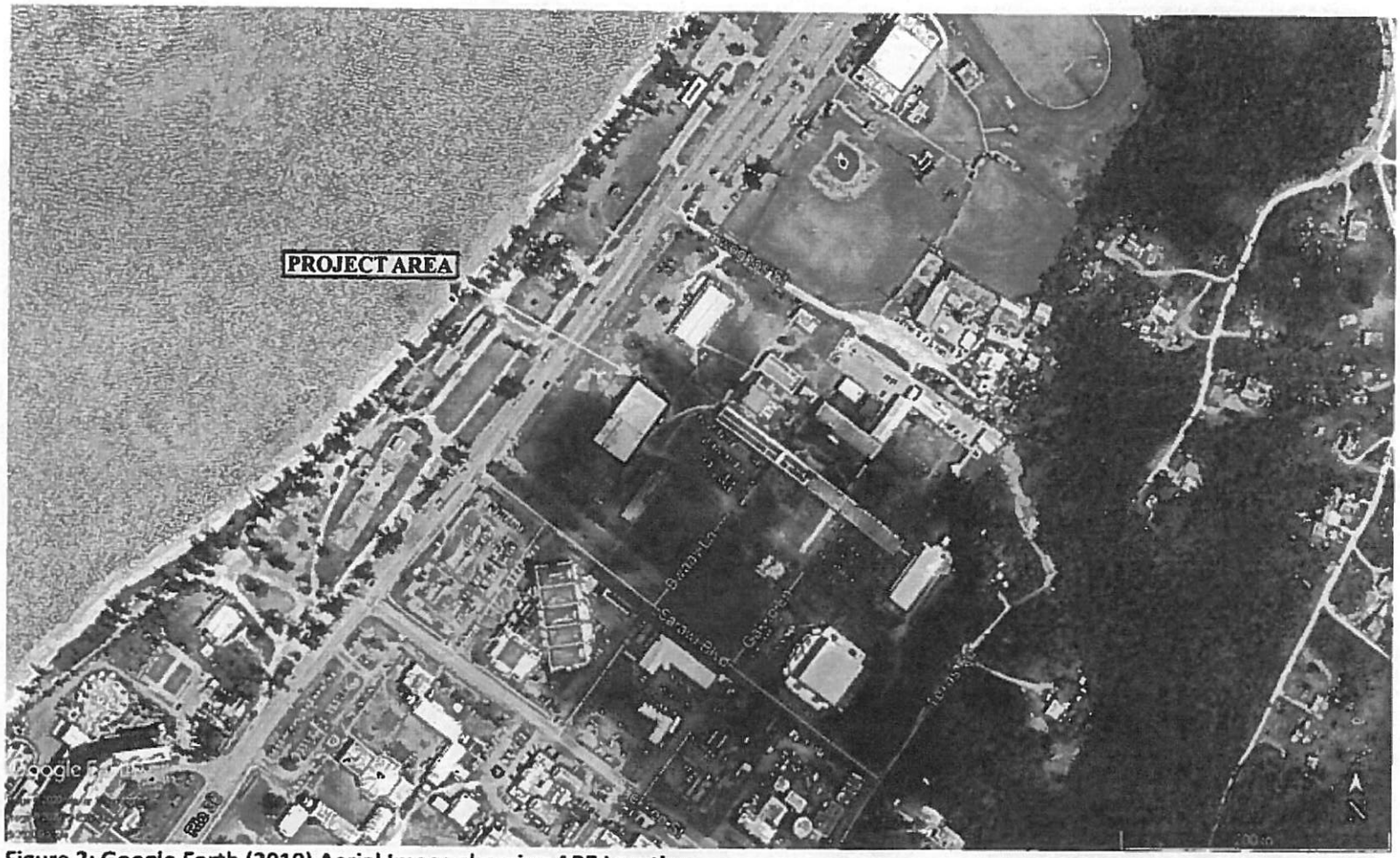



**Figure 2: Google Earth (2019) Aerial Image showing APE Location.**

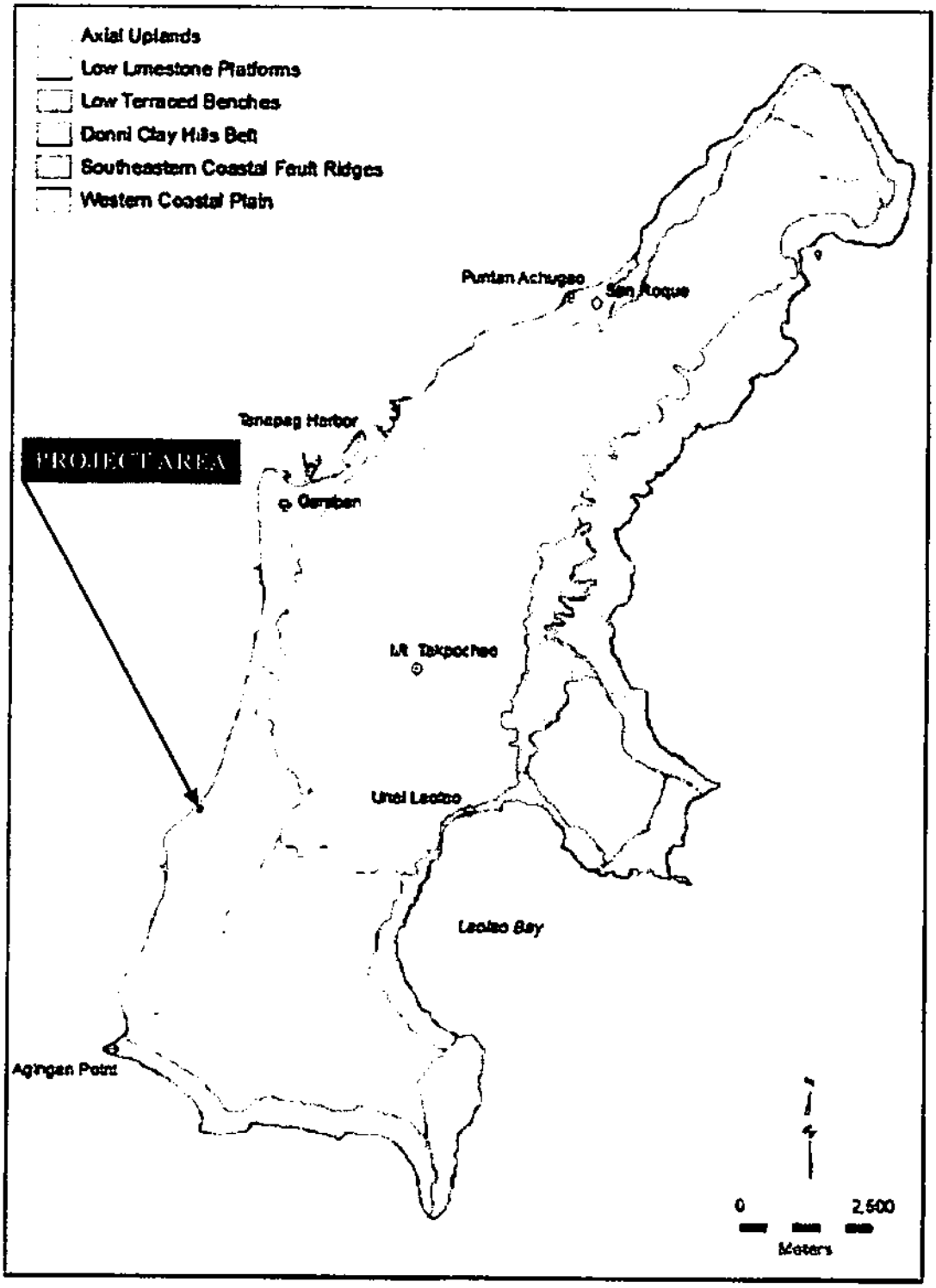



**Figure 3: Major Geomorphological Zones and Prominent Natural Features on the Island of Saipan (Tomonari-Tuggle et al. 2007:164).**

The purpose of archaeological monitoring is to identify any historical or cultural properties that may be affected by the project, as well as provide a description of the direct, indirect, and cumulative effects the project may have on these cultural resources. The present document also outlines the procedures for data recovery, if indeed the HPO requests such. Reporting at the end of fieldwork will conform to the "Content, Format, and Submission Standards for Final Reports of Archaeological Projects in the CNMI." In the event of encountering human remains, work protocol will follow "Procedures for the Treatment of Human Remains" adopted by the CNMI in 1999 (Appendix A). All activities will comply with pertinent sections of the National Historic Preservation Act (NHPA) and associated 36 Code of Federal Regulations (CFR) Part 800, as well as with CNMI Public Law 3-39. This planning document will require the approval of the HPO prior to the commencement of the project.

## PROJECT SETTING AND ENVIRONMENT

The APE occurs on the Marianas High School grounds and runs approximately 5 to 10 feet above mean sea level. The CTE building renovation occurs along the western portion of the campus, the latter bounded by Route 30 (Beach Road) to the west, Buoghas Street to the north, undeveloped land to the east, and Sarawi Blvd. to the south. Lake Susupe occurs c. 0.50-0.75 kilometers to the southeast of the campus. The APE is c. 250 m from the shoreline to the west and encompasses approximately 25,000 square feet. The campus is primarily a built environment with multiple buildings, annexes, and sports fields. Vegetation in the APE primarily consists of decorative species and maintained common lawn grass.

Soils in the APE have been generally classified as consisting of the Shioya series common along the western coastal area of Saipan (se Deenik 2010; Cloud et al. 1954, Figure 4). These are entisols or weakly developed sandy soils without B horizons which are deep and characterized by excessive drainage, low water holding capacity, and alkaline pH levels.

Stratigraphic profiles from the recent AIS work were fairly consistent and homogenous with depth (Dega 2020). The sequence was characterized by either an asphalt or O-horizon layer over limestone fill, with Latte deposits overlying sterile beach sand. The lowest levels of sand occurred over a limestone basement.

The following description provides an overall site stratigraphy for the APE (see Dega 2020:37). These layers are expected to be exposed again during project excavation work for the building columns.

**Stratum I (Asphalt and Horizon):**

In most trenches, the upper 4 cm (0-0.04 mbs) consists of asphalt which was laid around the building footing areas. An O-horizon was present in several trenches along the north and western flanks of the APE. The O horizon typically measured 10 cm and consisted of organic soil with many roots and few clastics. This modern layer was shallow and reflected recently laid grasses with sod.

**Stratum II (Fill)**

A shallow layer (c. 7 cm thick; 0.04-0.11 mbs) of fill was present below Layer I and consisted of crushed and angular limestone rock with an additive clay slurry. The limestone was white (2.5Y 8/1) and contained a mixed clay component to bind the limestone. This layer was modern and contained no roots or any modern debris.

**Stratum III (Fill)**

This common stratum consisted of finely crushed, compacted limestone from 0.11-0.31 mbs. The layer was white (2.5Y 8/1) and purposefully compacted as a hard surface level. This layer had no roots or other defining qualities and may have been a WWII construction due to its consistency and depth.

**Stratum IV (Latte Deposit):**

Between an average 0.31-0.61 mbs, Dark brown (7.5YR 3/3) fine grained sand; structureless, single-grain; moist, loose consistence; non-plastic; marine origin; few, fine roots; clear lower boundary; smooth topography where not disturbed.

**Stratum V (sterile sand):**

From c. 0.61 to 0.81+ mbs, very pale brown (10YR 8/4) fine grained sand; structureless, single-grain; moist, loose consistence; non-plastic; marine origin; few, fine roots; clear lower boundary; smooth topography.

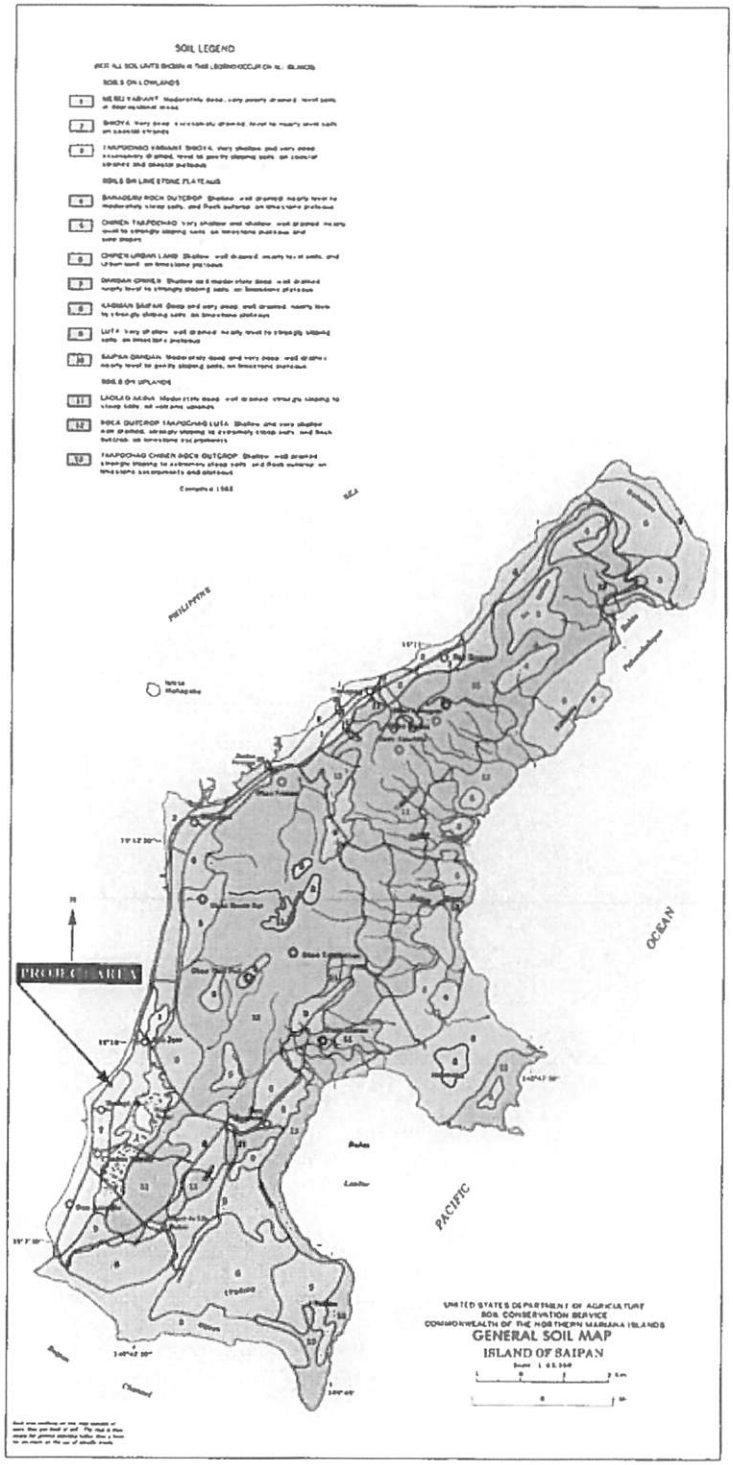



**Figure 4: USDA Soil Map of Saipan, CNMI.**

## PROJECT UNDERTAKING

As stated above, the proposed CTE Center occurs wholly on the Marianas High School campus, on land owned by the CNMI Department of Public Lands. The project consists of constructing a 25,000 sq. ft., two-story building (50,000 sq. ft. in total) that will rest on the concrete slab of the former CTE building. The building will measure approximately 84 ft. by 300 ft. (25,200 sq. ft.), or roughly the same area that the 1978 steel buildings occupied, and will consist of a pre-cast concrete, two-story structure. The concrete slab already on-site will serve as the ground floor slab of the new building but there will be new footings built for the new structure. There are two options for the new footings which require excavation work.

Option 1 - conventional column/beam structure with infill non-load bearing concrete walls
42 columns @ 3m x 3m x 1 m deep + continuous footing for infill walls, 230 m x 0.6 m wide x 0.6 m deep

Option 2 - precast bearing walls
8 columns @ 3m x 3m x 1 m deep + continuous footing for bearing walls, 230 m x 0.9m wide x 0.6 m deep

These options demonstrate the total area that will be subject to excavation for the project. The main footing excavation area will measure 230 m long by 0.60-0.90 m wide to a depth of only 0.60 mbs or 1.96 feet below surface. This depth is within known cultural layers at the MHS. As discussed below, a total of 20 trenches covering almost 100 m of excavation were completed for the AIS.

## HISTORICAL CONTEXT TO PROJECT LOCATION AND ENVIRONS

Settlement in the Marianas, primarily on Saipan, is becoming more reliably documented to have commenced c. 1500 BC (see Perzinski and Dega 2016, Carson 2014), although recent examination of secondary and tertiary data by Rieth and Athens (2017) argues for settlement at c. 50-385 years earlier using Bayesian methods. To date, examining the evolution of ceramic styles coupled with radiocarbon dates have allowed for refining the Marianas cultural sequence into four periods: early pre-Latte, intermediate pre-Latte, transitional, and Latte period. This sequence was built upon previous work decades earlier, when Spoehr (1957) summarized a cultural sequence based on cultural material recovered from his studies. Spoehr's two phase chronology consisted of the pre-Latte (1500 BC to AD 900) and Latte period (AD 900 to 1700). The chronology was based primarily on the presence/absence of Latte sets and finely-finished redware pottery (Carson 2012). While very close to the mark of what present day scholars are

using for cultural sequencing dates, later studies helped refine Spoehr's original sequence, breaking the pre- Latte period into 3 separate periods again using pottery, radiocarbon dating, as well as presence/absence of various types of midden and artifacts through time (Reinman 1977 and Dixon et al. 2006). These four cultural sequences are summarized below by their archaeological signatures with a note that the dates are fluid (i.e., 1500 BC, 500 BC etc. represent fairly general temporal terms).

**EARLY PRE-LATTE PERIOD: 1500 BC TO 500 BC**

Initial colonization of the Mariana Islands is believed to have occurred by at least 1500 BC. It is hypothesized that these arrivals originated in island Southeast Asia, around the Maluku/Sulawesi region of present-day Indonesia (Dega 2016). Based on previous archaeological work (see below), these early inhabitants lived in near coastal environments, specifically along stretches of coastline that had a fringing reef and access to marine resources. Archaeological studies at Unai Bapot (see Carson 2008, 2012) and environmental studies (Athens et al. 2002) have confirmed the earliest radiocarbon dates from these areas in the southern Marianas (Guam, Tinian and Saipan) along with the presence of finely made red slipped pottery often impressed, incised, or stamped and tempered with calcareous sand. Conus shell ornaments (almost exclusive to older deposits) have also been documented at the House of Taga and Unai Chulu (Tinian), Chalan Piao (Saipan), and Achugao (Saipan). Radiocarbon dating of organic material in associated stratigraphic layers in Unai Chulu had age ranges from 2350 to 3160 BP (Craib 1986). Similar dates were also noted in Achugao and San Roque deposits respectively (Butler 1995; Perzinski and Dega 2016) and at Chalan Piao (Moore et al. 1993). The Unai Bapot-1 site at Laolao Bay on Saipan's east side contains deposits spanning 3000 years of occupation with the oldest dating to 1600 BC (Carson 2008). The early dates from sites such as Unai Bapot-1, Chalan Piao and Achugao are "significant, as the dispersal predates Lapita expansion" (Clark et al. 2010:30). What is quite arguable today is that the peopling of the Marianas represents a separate migration from the more celebrated Lapita migrations across Melanesia and beyond. There is no evidence for Lapita culture in the Marianas (Dega 2016).

**INTERMEDIATE PRE-LATTE PERIOD: 500 BC TO AD 400**

The Intermediate pre-Latte Period is distinctive from the earlier period based on the form and function of pottery. Unlike the more bulbous and non-thickened rimmed pottery from earlier periods, these ceramics were flat on the bottom with vertical side walls. It is believed that these pots were more suitable for frying or roasting foods in earth ovens versus boiling. This suggests either a change in cooking styles or a shift in dietary preferences. These bowls

also were larger in size suggesting a more communal aspect to sharing of food within the villages. The large size of the bowls has been argued to be indicative of more settled, permanent villages (Moore and Hunter-Anderson 1999). This hypothesis is based on the assumption that larger ceramic vessels do not travel as well as smaller vessels.

Like the Early pre-Latte period, it is believed that villages in the Intermediate phase were located along the coastline with ready access to marine resources. Examples of pottery from this timespan have been found almost exclusively along coastal deposits and not at more inland reaches.

**TRANSITIONAL PERIOD: AD 400 TO AD 900**

The Transitional Period was first described by Moore (1993) and refers to the time period where ceramic styles are consistent with later Latte period ceramics, but the archaeological record does not show contemporaneous Latte stone sets. During this phase, the thick, flat-bottomed bowls thought to have been associated with earth oven cooking were supplanted by bowls with rounded bases, incurving rims "that were suited to above-ground cooking, suggesting another change in vessel function or social context, or both (Moore and Hunter-Anderson 1999)." It may be argued that again, changing ceramic vessel morphology may be a function of dietary shifts. Dixon et al. (2011) suggest that "changes in cooking technology appear to accompany changes in subsistence activities, although the majority of habitation sites were still focused on a relatively stable coastline and its resources" (Dixon et al. 2011:377).

**LATTE PERIOD: AD 900 TO CA. AD 1700**

The locally recognized Latte period refers to the time when people built house structures elevated on stone pillars (*haligi*) and capstones (*taza*) that stacked together are called Latte. Several other material markers are common during this period, including changes in pottery style and function, artifacts type and diversity, and of course, colonization in the seventeenth century (see Carson 2012a). Another shift was in dietary preferences, which may directly relate to the changes in ceramic technology. Characteristic changes in ceramic style and type included vessel form, rim thickness and shape, surface treatment, wall thickness, and tempering agents. Spoehr (1957) and most others having worked in the Marianas have classified Marianas Plainware as distinguishable by its thicker profile, coarser material, and a thickened rim. More pointedly, these vessels have thick walls, coarse volcanic sand temper, and thick rims. These ceramics are very utilitarian in nature and not decorated.

The adaptation to a heavier, larger, utilitarian-type vessel may be predicated again on a change in subsistence strategies. Stable isotope data from a collection of Garapan burials (see Dega 2016) suggests a shift to a more terrestrial diet based on carbohydrates, starches, and proteins, not just marine resources. The Latte period burial assemblage yielded significant signatures indicating a reliance on breadfruit, taro, coconut, and even rice. The Marianas Plainware ceramics also "may predate by several hundred years the construction of Latte structures, but increased vessel sizes over time imply increasing capacity for boiling and storage of food...suggest a growing demand for sustenance" (Dixon et al. 2011:378). Craib (1986) states:

> Chomorro sociopolitical organization at this time is interpreted as having centered around autonomous kin-based groups, several of which could exist within a single village. The presence of these groups is suggested in early Spanish accounts and by the spatial organization of Latte sets within settlements.

In addition to shifts in subsistence strategies, artifact variability and quantity increases in the Latte period, this likely a result of population expansion and specialization. Artifacts included in Latte assemblages include both utilitarian tools and decorative/ceremonial items, with some utilitarian artifacts also being utilized as ceremonial. The assemblage from this time period could include pottery, mortar/pestle, shell adzes (primarily Tridacna), spear points (bone), hammerstones/pounders, stone disks, slingstones, shell fishhooks and lures, stone adzes, shell pendants, worked coral/coral abraders, shell beads, and lithic flakes, among other classes. Slingstones are often found associated with burials of this period: a utilitarian tool being used in a ceremonial role.

Finally, the Latte era population of Garapan discussed above, it is further argued (Dega 2016), were Haplogroup E variants, or those associated with Island Southeast Asia E1 and E2 groups. The Latte culture is arguably an indigenous, *in situ* development and does not represent a second migration. Latte period populations resided in coastal settlements, particularly as beaches were accretionary through time. In addition to the coastal settlements, Latte period settlement was also occurring in inland areas away from the coastal environs (Dixon et al. 2011) as well as on more marginal islands in the north (Russell 1998).

**POST-CONTACT ERA**

The Post-Contact Era in the Marianas started with the arrival of the Portuguese explorer Ferdinand Magellan in 1521. During the 1500s and early 1600s, the first explorers and missionaries collected numerous accounts of the native Chamorro and their customs. By the mid-1600s to the end of the 1800s the Spanish had established missions and commenced a program of "*reduccion*" to assimilate Chamorro communities to Catholicism and a more

Western lifestyle. All Chamorro of Saipan, Tinian, and the other northern islands had been resettled on Guam by 1740, the two villages on Saipan that previously housed the entire island population (Anaguan and Fatiguan) having been cleared at that time (Russell 2017:4).

Following the conclusion of the Spanish-American War in 1898, the Northern Mariana Islands were transferred from Spanish to German rule in which their presence was "largely administrative" (Farrell 1991:286), but still influential. Copra production drove the German economic machine on Saipan and roads were constructed linking villages, particularly the main population centers of Garapan and the Tanapag Harbor area (Russell 2017:5). The German presence on Saipan was non-intensive, compared to later nations, as there "were never more than 12-15 German administrators in the islands at any one time" (Bowers 1950:41); however, their legacy remains in copra production, creating a more functional Tanapag Harbor area, and repatriating non-Saipan residents home, particularly to the Carolinian Islands.

The Japanese colonial period commenced in the Fall of 1914 after the start of WWI as the Japanese navy took over control of the Northern Marianas (Russell 2017:6). By mid-December, the Mariana Islands came under the military administration of Rinji Nan'yo Gunto Bobitai, the Provisional South Seas Defense Force (Dixon 2004). In 1919 the League of Nations gave Japan control over Germany's prior possessions in Micronesia, including the Mariana Islands.

From the takeover period, sugar cane became hugely important as a main economic driver of the islands. Some 15 years after dedicating resources to sugar cane development and cultivation, five sugar plantations were present on Saipan, along with areas cultivating coffee and pineapple (Russell 2017:6). The plantations were located at Fadang, Hakmang, Banaderu, and the Kalabera area. Refineries were built at Charan Kanoa to the southwest of the APE, at Hakmang, and Matansa. The Matansa refinery was connected by the railroad to Banaderu and then Kalabara to the north, along the coastal plain up both the northeast and northwest coasts, alongside the limestone plateau. The railroad then took the sugar to Tanapag Harbor where it was sent to Japan. An influx of migrant workers, mostly of Okinawan descent, settled in the Marianas to escape overpopulation in their homeland and work as laborers in the sugar cane fields (Dixon 2004). Across the island, the Japanese built homes, shops, schools, restaurants, and buildings to hold the various government and civic offices. Tanapag Harbor was developed further and a channel through the reef was completed for use at the newly completed Sugar Dock (Susupe) to handle the output from Charan Kanoa.

With the onset of WWII, Japan began a massive military buildup on Saipan and throughout the Marianas. Saipan was fortified with concrete pill boxes, machine gun nests, and administrative and logistical support structures that can still be found throughout the island. The first six months of World War II were favorable for Japan on the offense. The defeats at Midway and Guadalcanal in 1942 marked a change in policy for the Marianas Islands. They were to be turned into fortresses along the inner defense line (Peattie 1988:250). Fortifications were built along beaches and highlands. Not until the first few months of 1944 did it become apparent that fewer ships were arriving from Japan and those that did told of wolf packs of United States submarines. Many fortifications could not be completed for lack of cement, rebar, and heavy guns and those on the island could not be emplaced due to the lack of machinery to move them. United States aircraft carriers began launching strikes in February of 1944 and did not cease until the Marianas were taken from Japan by August of 1944 (Hoffman 1950).

The Japanese fortified Magicienne Bay on the southeast coast, Afetna Point on the southwest coast, Mutcho Point and Tanapag on the west, and north along the shore and in the highlands to Makunsha. Mount Tapotchau and the adjacent limestone heights were girded with pillboxes, bunkers, mortar pits, and reinforced caves. The Battle for Saipan would mark a definitive change in Japan's war with the U.S. Saipan was regarded as a Home Island, a place where citizens of the Empire lived and prospered. The ferocity of the Japanese Navy and Army had never been doubted but with Saipan came an awareness of the fanaticism and fantasy that existed in the Japanese High Command. Having lied to each other and to the people for over a year, there was no way to explain how a massive American Fleet had come to Saipan (Hornfischer 2016).

The Battle of Saipan commenced with the amphibious invasion of the beaches to the north and south of Charan Kanoa. By July 16 all combat commands were ashore and a beachhead established extending to within a few hundred meters of the APE. The Japanese fought the landings and advances north and east. On the night of July 18, the Japanese counterattacked with thousands of infantry and 44 light and medium tanks. The counterattack took place very close to the APE as its objective was the radio station to the west. Pre-battle planning maps suggest that this region of the island was considered tactically and strategically significant to the Japanese command. The tank battle was the largest armored confrontation in the Pacific theater. By July 19, most of the tanks were destroyed and the Japanese retired to their defenses in the mountains inland of the project location. This terrain would acquire names

such as Death Valley and Purpleheart Ridge during the course of the bitter fighting in the area (Crowl 1993:172).

Following the end of WWII in September 1945, the Northern Marianas became a part of the Trust Territory of the Pacific Islands, with the U.S. Navy being named as the administrator. Immediate post-war aerial photographs show that the general area was possibly utilized by the Japanese for agricultural endeavors (sugar cane). This would seem logical given the rarity of the Kagman clay soils well suited for agriculture in the area and the proximity to the dock and rail network of Charan Kanoa. Several structures also appear to be visible, as well as the outlines of fields and paths.

Large areas of Saipan were developed after the battle for the island into a major base for the aerial assault on Japan. Along with Tinian and Guam, B-29 Super Fortresses would pound Mainland Japan until the atom and hydrogen bombs attacks were launched from Tinian. Aerial photographs from c. 1945 show that the MHS area was one of the few level areas not to be intensively disturbed and developed during the post-battle base-building program.

The Post-Contact era, while certainly ushering in major and dramatic changes to the indigenous model of settlement, politics, and society, yielded many important archaeological signatures as well, from Historic-era buildings to artifact assemblages as small localities grew into larger villages. The artifact assemblages changed dramatically from more natural-procured elements such as stone, shell, wood, and limestone during pre-Contact times to manufactured goods: porcelains, glass, metal, iron, and eventually, plastic. Historic period sites in the Marianas consist of a wide variety of structures, roads, and infrastructure as the islands transformed to meet nineteenth and twentieth century necessities. Under U.S. command, many military facilities were constructed across the island, from airfields and hospitals to troop quarters, warehouses, supply depots, and ammunition storage locations (Russell 2017:9). From post-WWII times the island has been transformed considerably with its nexus as a tourist hub from Asia through the construction of more roads and infrastructure, and hotels and other commercial businesses. The transformation of the island in Historic to recent times has indeed altered the archaeological signatures occurring on the surface and in subsurface deposits. The current project location is no exception.

Table 1 provides a summary table of the above activities occurring over time on Saipan.

**Table 1: Saipan Chronology.**

| *Major Period* | *Event/Activity* | *Date* | *Note* |
|---|---|---|---|
| **Pre-Contact Era** | **1500 BC – AD 1521** | | |
| | **Settlement** | By 1500 BC | First human transformation of the Saipan landscape, settlement, and agriculture |
| | **Pre-Latte Period** | 1500 BC - AD 1000 | Coastal settlements based on marine resources, taro, and coconut; perishable structures |
| | Early | 1500-900 BC | |
| | Intermediate | 900-400 BC | |
| | Late | 400 BC - AD 400 | Initial movement into interior areas |
| | Transitional | AD 400-1000 | Agricultural intensification |
| | **Latte Period** | AD 1000-1668 | Island-wide settlement; communities with Latte stone structures |
| | Early Latte | AD 1000-1300 | Beginning of Latte construction and probable introduction of rice |
| | Middle Latte | AD 1300-1521 | Elaboration of Latte structures |
| | Late Latte | AD 1521-1668 | Continuity of traditional Chamorro life with infrequent Spanish contact |
| **Spanish Era** | **AD 1521-1898** | | |
| | Spanish discovery of Guam | AD 1521 | |
| | *Nuestra Senora de Concepcion* wrecks off Aguigan Point | AD 1638 | |
| | Spanish settlement of Saipan | AD 1668 | |
| | Father Medina and two Philippino lay brothers killed on Saipan | AD 1670 | |
| | Chamorro revolt on Saipan | AD 1684 | |
| | Chamorros from Gani brought to Saipan | AD 1698 | |
| | Churches at Anaguan and Fatiguan destroyed by typhoon | AD 1705 | |
| | Chamorros removed from Saipan, island depopulated | AD 1722-1730 | Traditional site occupation is truncated |
| | Carolinian families first visit Saipan | AD 1805 | |
| | Carolinian Chief Aghurubw settles at Arabawal / Garapan | AD 1815 | |
| | Carolinian families authorized to remain on Saipan | AD 1818 | |
| | New group of Carolinians allowed to settle on Saipan | AD 1843 | |
| | Chamorros begin to resettle on Saipan | AD 1865-1869 | |

| Major Period | Event/Activity | Date | Note |
|---|---|---|---|
| | Spanish *deportados* temporarily housed on Saipan | AD 1875 | |
| German Era | **1898-1914** | | |
| | Spanish-American war, acquisition of Guam by the United States; acquisition of the Northern Mariana Islands by Germany | 1898-1899 | |
| | German administration; Garapan becomes capital of NMI | 1899-1914 | |
| Japanese Colonial Era | **1914-1939** | | |
| | WWI, Japan occupies the formerly German-held islands of Micronesia | 1914-1919 | Mariana Islands settlement is an expression of Japan's *Nanshin Seisaku* or Southern Advance Policy |
| | League of Nations creates the Micronesia Mandate, governed by Japan | 1919 | |
| | Nan'yo Kohatsu Kaisha (NKK) established on Saipan, introducing successful sugarcane commerce | 1922-1926 | |
| | NKK leases properties on Saipan for sugarcane cultivation and refinery in Chalan Kanoa | 1926 | |
| | Garapan becomes capital of "Japan in the Tropics" | 1926-1944 | Transformation of Saipan landscape, most of the island is converted to sugarcane cultivation; private land leased |
| Japanese Military Era | **1939-1944** | | |
| | Japanese Naval Air Facilities established (facilities of the 1st Air Fleet as of February 1944) | 1939-1944 | Change to Saipan landscape as various agricultural areas are converted to air bases and defenses without compensation |
| | Japanese forces construct defenses and places of war refuge | 1941-1944 | |
| Battle of Saipan | **June 1944** | | |
| | U.S. amphibious assault (first day) | | |
| | Japanese defenses hard fought; Banzai charges at Tanapag critical juncture in the battle | | |
| | Prisoner of War camp established at Susupe | | |
| | U.S. cemetery established at Hopwood | | |
| U.S. WWII Era | **August 1944 – September 1945** | | |
| | U.S. military facilities (airfields, camps, defenses) established across the island | | Airfields at Aslito, Koblerville, Kagman, and Marpi |
| Early Post- War Era | **1946-1953** | | |
| | Japanese and Korean soldiers and civilians repatriated from Saipan | 1946 | POW camp at Susupe abandoned |
| | Chamorros and Carolinians in camp at Chalana Kanoa liberated | July 4, 1946 | NKK structures become base of new community |
| | Trust Territory of the Pacific Islands declared | April 2, 1947 | Capital on Guam |
| | US Naval Technical Training Unit established to train Nationalist Chinese forces on Saipan | 1952-1962 | Saipan reverts to US Navy control until it becomes capital of Trust Territory |

Source: Farrell 1994, 2011.

## PREVIOUS ARCHAEOLOGICAL RESEARCH

This section focuses on previous archaeological research conducted within and near the APE and the results of the research. This in turn informs as expectations prior to the current project as well as forms a baseline of research questions to address during this study.

One of the earliest archaeological studies conducted in the Mariana Islands was conducted by Spoehr (1957), some of his work which occurred near the current project location (Figure 5). Spoehr (1957:57) documented sites to the north of the APE. The Oleai site consisted of a large amount of marine shell that covered the surface. Four excavated trenches revealed additional shells and sherds. Spoehr concluded that the Oleai site had been a temporary habitation site occupied during the late Latte period.

In 1980, the Pacific Studies Institute (PSI) conducted an archaeological and historical resource survey of the Susupe-Chalan Kanoa Flood Control Study Area for the U.S. Army Engineer Division (Thomas and Price 1980). Their project location was between Lake Susupe and the coastline and encompasses the current MHS APE. Three loci of prehistoric material were located within their project area and were centered around the Chalan Piao, Chalan Kiya, and Oleai sites. Locus A was found to contain a density (> 5 sherds/square meter) of Plainware and extensive surface midden deposits. Locus B was characterized by Plainware occurring mostly at the surface, though not in the same density as Locus A. Both Locus A and B were concluded to have been former village sites. Locus C was also characterized by a dense scatter of mostly Plainware but also Redware pot sherds and midden. Locus C was estimated to have been occupied in the pre-Latte and Latte periods.

The study also identified forty-three structures of probable historic significance eligible for inclusion in the National Register either individually or as a historic district. The structures were predominantly from the Japanese colonial period and included 23 dwellings, 10 structures from a Japanese communications complex, and various other industrial buildings, bunkers, and catchment tanks. The report recommended that a data recovery plan be developed to mitigate the adverse impacts to prehistoric material by the proposed leveling and drainage canal construction.

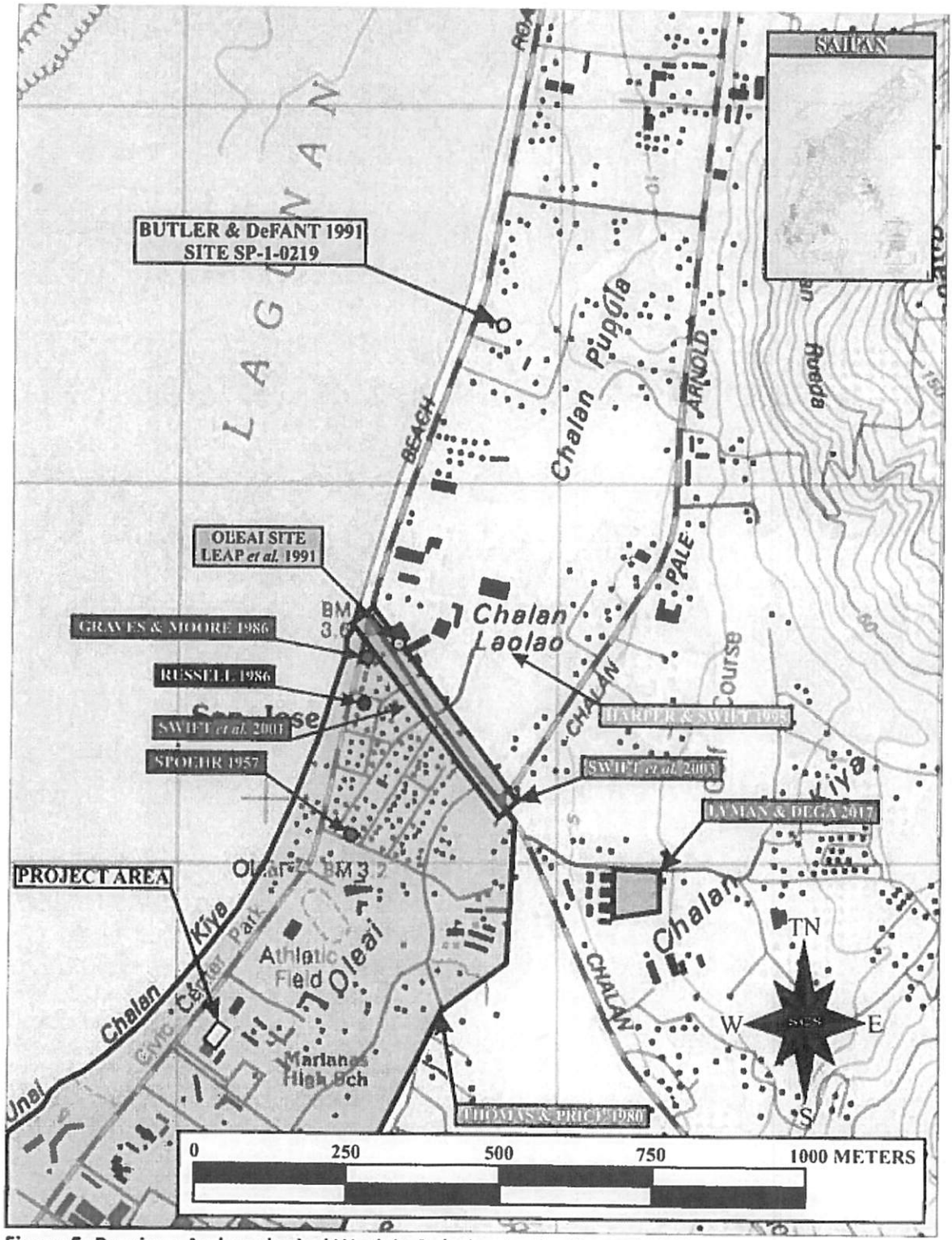



**Figure 5: Previous Archaeological Work in Relation to the Current APE.**

Graves and Moore (1986) conducted emergency data recovery north of the current project location, just to the south of the Beach Road/Chalan Pale Arnold intersection. Cultural materials including pottery, shell ornaments and tools, and stone tools were found with 20 burials (Russell 1986). According to Moore (1988), the sherds that were identified as Latte period sherds based on the rim type and thickness of the diagnostic pieces.

In the same year and in close approximation to the Graves and Moore (1986) project area, Russell (1986) conducted excavations in the Oleai area east of Beach Road, also the north of the current APE. Four test units were completed and two stratigraphic layers were documented. Both strata contained modern artifacts mixed with prehistoric artifacts. The project yielded a small range of artifacts from Latte times through modern debris which had been commingled in the deposit.

Much further to the north, Butler and Defant (1991) conducted archaeological inventory survey that included survey, three backhoe trenches, and fifteen shovel test pits of a small project area inland (east) of Beach Road. Pottery sherds, shells, and burnt coral were recovered from the excavations. The site, designated as Site SP-1-0219, was assessed as a prehistoric habitation locale dating to early Latte times.

Archaeological work was done by Swift *et al.* (2003) for a roadway expansion project of Chalan Monsignor Guerrero Phase III which connects Beach Road to Middle Road. The project is located to the northeast of the current APE. Twenty trenches were excavated. A total twenty-eight burials were identified as well as lithic and shell tools, food midden, and ornaments all dating to Latte times.

Southeast of the current APE, Lake Susupe has been the site of paleoenvironmental coring studies. Athens and Ward (1999; 2005) dated charcoal to 4,000 bp, much earlier than other accepted dates (Peterson 2012:5). They argued that the charcoal was the result of forest clearing activity. Criticism of the study argued that the charcoal could be from forest fires in Asia. Additionally, the dates were found to be out of sequence in the cores due to bioturbation or some other mechanism (Peterson 2012). Peterson and Acabado (2012) argued that it was erroneous to assume that predictable models of landform evolution in the Susupe region could lead to a reliable depositional history. Additional palynological research is definitely warranted for this area and could reveal even earlier dates for occupation on Saipan, if the data proves robust.

SCS conducted archaeological inventory survey on Lot 1734 New-4-R in Chalan Kiya, a parcel to the northeast of the current APE (Lyman and Dega 2017; Dega et al. 2018). Called the Marpac Project, pedestrian survey and representative testing were completed within the project location. No surface sites were present and the excavation of 28 trenches led to the documentation of primarily sterile, homogenous clay and silty clay soils. Eight of the trenches yielded a very small quantity of Historic-era bottles and ceramics related to the Japanese Colonial period.

Harper and Swift (1995) conducted an archaeological survey with a subsurface testing component in advance of construction of the Saipan Power Center along Chalan Monsignor Guerrero (see Figure 5). Four sites were identified and designated as SP-4-0567, -0564, -0565, and -0575. During the survey, a Japanese Period farming site was located, the main features of the site being a concrete water cistern adjoined with a deteriorated concrete slab (representing a former washing area) and a concrete *ojalla* water container inset in a concrete block. Japanese Period ceramics and glass, a metal axe fragment, and an enamel water pitcher were also found at the site (Harper and Swift 1995:21). Within their project area, a wetland with a canal system was also discovered. The system was comprised of a central rock-lined ditch and four hand-excavated feeder canals. A concrete water tank was found in proximity to the canal system, though there was no evidence that the two connected. Harper and Swift (1995:63) proposed that the wetland was used as irrigation source by Japanese homesteaders.

One prehistoric site and one United States World War II site were also revealed during excavation work. Six trenches contained prehistoric cultural materials identified as part of a single site dating to the Latte Period. The primary site features included a hearth, a charcoal lens associated with cooking, a posthole, and one feature of unknown function. Associated artifacts included ceramics, *dogas*, and gastropod and bivalve marine shell. Upper layers of the cultural stratum were disturbed by post-WWII activities and prehistoric artifacts were often intermingled with modern materials, but the lower layers remained intact (Harper and Swift 1995:33–34). The WWII site was anticipated by aerial imaging from 1946 that shows extensive military facilities in the area. Subsurface testing uncovered six features, including refuse, pipelines, and a buried 55 gallon drum (Swift and Harper 1995:63–65).

To the north/northeast of the current APE, along Chalan Monsignor Guerrero Road, Swift et al. (2001) conducted data recovery at the Mobil Oleai Site, later designated as SP-1-0576. In 1994, the HPO identified human remains and *dogas* (Strombus) midden at the site within 0.30-0.75 meters below the surface (mbs). The HPO called for data recovery of the site,

which was undertaken by Swift et al. (2001). The results of the study were quite interesting and showed the remnants of a Latte period coastal village. Data recovery led to the identification of a Latte period cultural layer (Stratum III) yielding human remains, subsurface features, and artifacts (ceramics, lithics, ornamental shell objects). *Dogas* shell was common throughout the layer (consumption). Five features were identified, including two charcoal lenses, a rock-filled pit, and two pits filled with *dogas* shell. Multiple human remains were also identified (MNI=5), two female and three males, all aged 20-45+ years old (adults). One of the bones was radiocarbon dated to A.D. 1015-1265, firmly within Latte times. Overall, the data recovery project led to the identification and recovery of a fairly substantive dataset which led to conclusions related to the social nature of the site. Activities occurring on the site included fishing, food collection, processing, cooking, consumption, and refuse discard. The manufacture and use of pottery and lithics was present, as well as the finding of two ornamental shell beads (ceremonial). While dating of the site remains something of a question, given the singular date, Site SP-1-0576 is thought to represent a prehistoric coastal habitation locus, with coastline to the west and wetlands to the north and east, a dynamic environment.

## RECENT ARCHAEOLOGICAL STUDIES WITHIN THE MHS CAMPUS

The following presents a more thorough summary of a recent archaeological project conducted at the MHS, very close to and within the current APE.

### HARPER ET AL. (2017)

SHARC completed archaeological testing and screening/raking after human remains were inadvertently discovered during construction of the MHS Cafeteria. The cafeteria is present just to the east of the current APE. Monitoring and data recovery were completed during the project. Good sediment descriptions were provided in the report for three investigated areas: westernmost footing trench (Trenches 1-5), perpendicular footing trench (Trench 6), and a footing trench in the northwestern corner of the main building (Trench 7).

The westernmost trench exhibited a fairly homogenous stratigraphy but did contain intact cultural deposits below upper level fill (Harper et al. 2017:8-12). Layer I (0-10 centimeters below surface; cmbs) consisted of dark gray sand and yielding modern debris, Latte sherds, and African snail shells. Layer II (10-30 cmbs) was composed of very pale brown gravel and sand, yielding a few Latte sherds and marine shell. Layer III (30-84+ cmbs) consisted of gray sand that yielded more diversity of artifacts: Latte sherds, charcoal flecking, Tridacna adzes, shell fishhooks, shell midden, fish bone, and human remains in the lower depths of the stratum. Layer IV (84+ cmbs) consisted of yellowish-brown sterile sand.

The perpendicular footing trench (Trench 6) was excavated to an unknown depth but contained three layers, all composed of fill (sand to sandy clay). Finally, Trench 7 yielded seven strata (Harper et al. 2017:12-13) which we interpret here as three main layers with several levels to each layer. Layer Ia consisted of very dark grayish brown sand (disturbed, fill) overlying Layer IIa, a coralline gravel layer interpreted to be from the Japanese Colonial period. Layer III represented an intact prehistoric layer composed of very dark grayish brown sand yielding Latte sherds and marine shell midden in a thin 5 cm lens. Layers IIIa through IIIc were essentially the same sediment and contained the same cultural materials. Harper et al. (2017:13) note this to be the eastern flank of "a large prehistoric village."

Three human burials were identified during the monitoring and recovery work, all considered as traditional burials and all occurring within Layer III between c. 69-88 cmbs. Two of the burials were intact (Burials 1, 2) while Burial 3 was mostly disturbed by the backhoe.

**DEGA (2020)**

Archaeological inventory survey was recently completed directly in the APE for this project, as noted above. Twenty trenches were mechanically excavated around the entire CTE building/footprint (Figure 6). A more coastal deposit of Site SP-1-1034 was documented during the study, the main site appearing to be c. 200 m inland from the CTE building. A Latte deposit, exclusively in coastal sands below limestone fill and above sterile beach sand, was documented in 18 of 20 trenches. The cultural deposit was mainly present at c. 0.30-0.61 mbs, although upper levels of the deposit were truncated due to fill episodes. The deposit was mostly darkened, sandy sediment with light charcoal infusion in most instances. Three subsurface features were documented: two hearths and one Dogas midden mass. Charcoal was present in these features in in the cultural layer itself. Artifacts were few and included Latte era sherds (mostly non-diagnostic body sherds) and a hematite slingstone. Shell was found in very modest quantities in the cultural deposit and almost exclusively consisted of Dogas shell (*Strombus canarium*; gastropod). One charcoal sample from Feature 1 was run through Beta Analytic and returned a date of AD 1274-1320, firmly with Latte times. It is hoped that during this monitoring/data recovery work, additional samples may be run to bracket occupation in this more coastal portion of Site SP-1-1034.

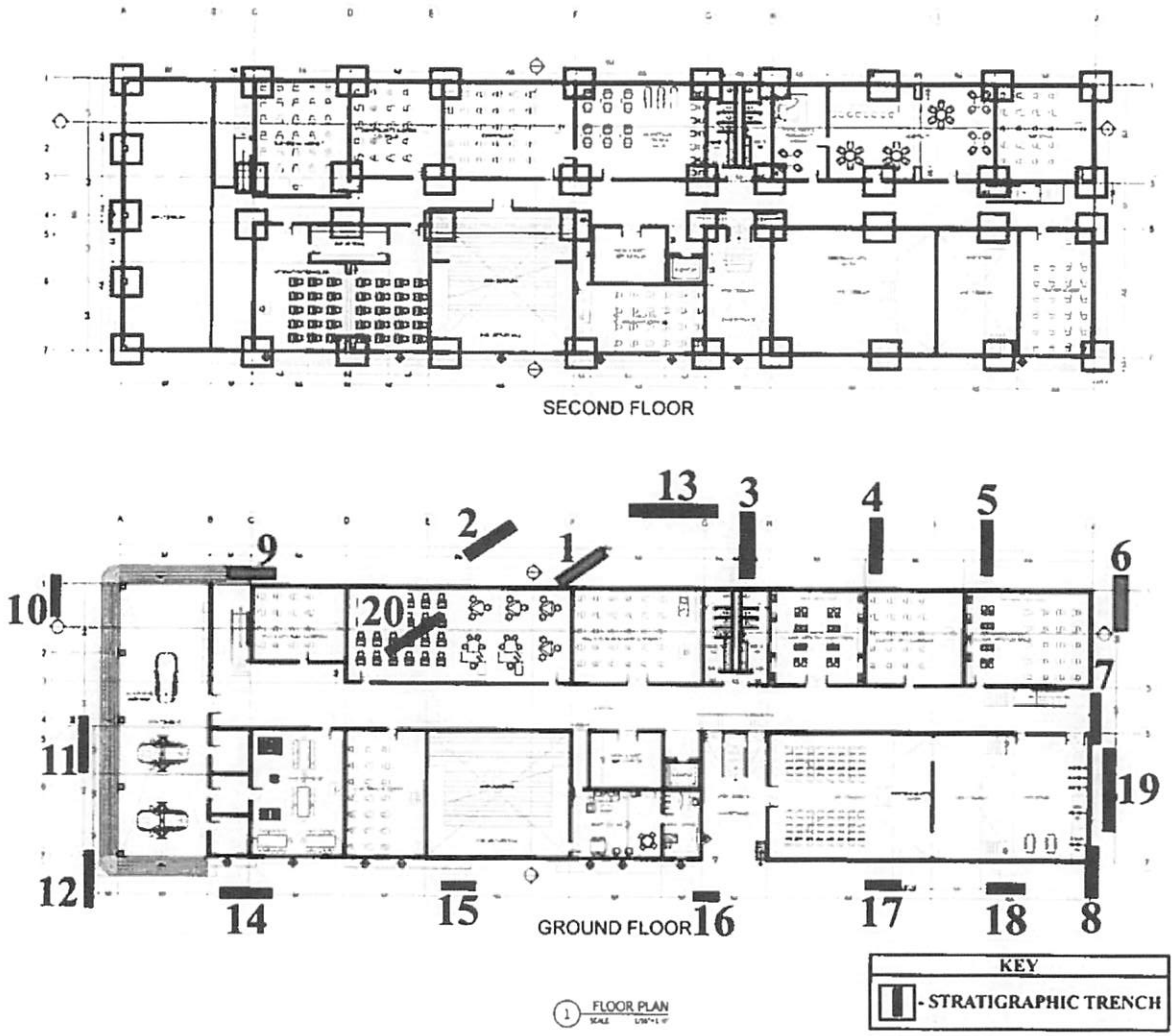



**Figure 6: Map Showing Location of Stratigraphic Trenches (ST) in APE.**

## ARCHAEOLOGICAL MONITORING AND DATA RECOVERY EXPECTATIONS AND RESEARCH QUESTIONS

Previous AIS investigations for this project addressed multiple research questions primarily related to presence/absence of subsurface cultural deposits in the APE and the nature and timing of the deposits. Those questions were addressed in the AIS report but bear repeating herein as they form the basis for the expectations and research questions for this next phase of research. The following presents a summary of salient conclusions in the AIS.

The current APE may well define the coastal, western boundary of this "large prehistoric village" which occurs across the MHS campus and to the north, Site SP-1-1034. Of interest is that the western flank of the current APE contained the deepest and richest Latte deposit. The trenches to the east did mostly contain the cultural layer but it became less pronounced as one proceeds to the west, toward the coastline. The cultural layer was faint in some of the western trenches and did not contain any artifacts. The working hypothesis is that a) the current APE represents the western boundary of the large prehistoric site or b) there is a continuation of the site further toward the coastline, but it exhibits less intensive occupation through time. At present, the former seems more likely as the top of the dune appears to have occurred near Beach Road and settlement would have been more successful in the back beach, not frontal beach area. In terms of occupation intensity, there is more evidence to suggest intensity and concentration of occupation/activities occurs to the west and less so to the east.

This makes sense in several ways. First, the Latte deposit becomes less concentrated as it proceeds toward the coastline. Second, there were no pre-Latte cultural deposits in the APE. These occurred several hundred meters inland (see Harper et al. 2017) and underlay Latte deposits. This shows a continuity in site occupation through time, which does not occur in the current CTE are of potential effect. In fact, the current area appears to be peripheral to the main prehistoric site which is more inland. There are no pre-Latte deposits, no burials, a minimal artifact record, and modest cultural deposit. In terms of landscapes, the western flank is more dynamic than inland areas, which would be more stable. Stable surfaces are more amenable to long-term occupation than dynamic zones. This may partially explain why the inland portion of this site yielded a greater diversity of artifacts and burials: Latte sherds, charcoal flecking, Tridacna adzes, shell fishhooks, shell midden, fish bone, and human remains.

The current project led to the identification of a continuation of Site SP-1-1043 which is more concentrated inland, to the east. The Latte layers discovered herein appear to be more so on the periphery of the larger central site area. The sites noted above in San Antonio, Oleai, and Chalan Laolao had much more extensive deposits, variety of deposits, and occupational depth. These were "centers" of habitation. The current project APE appears to be a peripheral Latte habitation area not occupied before this Latte times. The current Latte occupation date provides a date nearer the initiation of habitation in this area, with some occupation continuing over time, within the AD 1274-1320/1350-1391 range.

The current Latte occupation in the APE is dated to the late 11$^{th}$ century/early 12thc century. This sample was taken from above the base of initial occupation and below the terminal occupation. Thus, there was occupation before and after this time range. Additional dates may be run to assess the beginning of occupation in this area. However, the terminal occupation would be an estimate as the upper layer has been disturbed and/or completely removed for laying of the compacted limestone surface and water lines/pipes through the layer during WWII or modern times. Based on the data in hand, there is no clear change in occupational intensity over time in this peripheral area nor presence/absence of certain artifacts of shell types through time. There was simply just a modest artifact and ecofact record in this portion of Site SP-1-1034.

## RESEARCH QUESTIONS

The questions formed for this phase of the project are derived from the summary of AIS results and may be seen as a continuum of those research questions. A small sample (20 trenches) is in hand from the AIS. Monitoring/data recovery will certainly allow answers to those questions to be refined herein. The questions are presented below.

1. Are there micro-temporal periods into which the known Latte deposit may be divided which could show changes in occupation intensity through time? Changes in artifacts types or quantity over time? Do some levels yield more of a certain artifact type than others? Are there differences in shell midden types consumed on the site over time?
2. What is the temporal onset of occupation and what is the termination of occupation at this Latte site. One date from this project yielded date ranges of AD 1274-1320/1350-1391. While dates from the inland portion of this site were not acquired by Harper et al. (2017), their research did reveal a long, continuous occupation from pre-Latte times through Latte

times, contemporaneous with the site at the CTE center. The current contemporaneity only extends to the Latte period, however. What is needed herein is bracketed dates for initial use of the APE and terminal use, if possible, given the truncation of upper levels of the Latte deposit.

3. Will opening up more ground lead to the identification of more habitation-based features, such as post holes, more hearths, and even Latte stone sets? Or, will this area still be judged as somewhat peripheral to the more inland location of the site with a deeper, more robust cultural deposit?

## ARCHAEOLOGICAL MONITORING

Monitoring will be conducted by AA personnel for all ground disturbing construction activities in order to identify any potentially significant archaeological features or deposits discovered during the work. The intent is to identify these significant features/deposits and evaluate them for potential preservation or data recovery. If such cultural resources are found during monitoring, they will be exposed to the extent necessary for construction, with HPO consent, and as required for the archaeological team to determine the boundaries of the site and how it may be impacted by construction. AA will document, through field forms, maps, and photographs, the site in related to a permanent site datum.

AA will determine the stratigraphic sequence, approximate date of deposition, integrity, and range and quantity of artifacts from the known site during monitoring. If a cultural deposit is determined to be potentially significant by the HPO, manual excavation may be utilized to determine the best strategy for mitigation of any potential impacts. AA will provide the HPO with options for avoidance, preservation, partial preservation, or excavation and curation. Based on site information supplied by AA to HPO, the HPO will select any mitigation measures to be employed for the known site.

In addition, multiple tenets of archaeological monitoring will be completed during the project. Archaeological conventions and methodologies for the work are presented below. The following presents the crew and methods for this phase of the project.

Available staff for this project consist of the following individuals and present location:

Michael Dega, Ph.D. (Principal Investigator)
Trevor Iliff, B.A. (Field Director)
David Perzinski, B.A. (Field Director)
Derek Butler, B.A. (Field Technician)
Joseph Farrugia, M.A. (Field Technician)
Kepa Lyman, M.A. (GIS specialist)

Trevor Iliff or Derek Butler will likely be the primary monitors during the project, under the direction of M. Dega, Principal Investigator. Christopher King, Ph.D. will continue to be the project osteologist during this work. We also welcome any staff from the CNMI-HPO who would like to monitor with our team.

**Archaeological Monitoring Conventions and Methodology**

Monitoring is to occur during any ground altering activities associated with the CTE center project. AA will use the following guidelines during monitoring of the APE:

1. All subsurface construction activities for the project will be monitored by a qualified archaeologist from AA. No ground altering activities will occur on the project until this research design has been accepted by the HPO.

2. Ground altering refers excavation of any original, natural soil and does not include fill brought in for the project. Monitoring will be on a full-time basis when working with original, undisturbed ground.

3. If significant non-burial cultural deposits and/or features are identified during Monitoring, the on-site archaeologist will have the authority to temporarily suspend construction activities at the find location so the deposits or features may be identified, documented, and assessed for significance. The HPO will be immediately consulted regarding appropriate documentation and assessment, as noted above. Documentation will include GPS plotting of the find location, recording location on site map, photographing with scale and north arrow and illustrating the deposits or features in planview and/or profile view (depending on nature of exposure), recording stratigraphy using USDA soil survey manual terminology and attributes and Munsell soil colors, and plotting and collection of artifacts and soil samples; stratigraphic profiles will measure a minimum of 1 m across. Construction work and/or back-filling of excavation pits or trenches will occur in the location of find only after all archaeological documentation has been completed and approved by the HPO.

4. Stratigraphy will also be recorded and photographed with north arrow and scale at selected locations to provide representative stratigraphic data across the APE. Again, the profiles will measure a minimum of 1 m across. Both vertical and horizontal scales will be recorded.

5. In the event that human remains (burial or isolated, displaced skeletal elements) are inadvertently encountered, all work in the immediate area of the find will cease, the area and human remains will be secured, and the archaeologist will immediately notify the HPO. Procedures for the Treatment of Human Remains" adopted by the CNMI in 1999 will be followed (Appendix). Work will resume in the area of the inadvertent find only following HPO approval.

6. To ensure that contractors and the construction crew are aware of this archaeological monitoring plan and possible site types to be encountered in the APE, a coordination meeting will be held between the construction team and PI/monitoring archaeologist prior to re-initiation of the project. The construction crew will also be informed as to the possibility that human burials and/or cultural deposits or features could be encountered and how protection and mitigation should proceed if they observe such remains.

7. The archaeologist will provide all coordination with the contractor, HPO, and any other groups involved in the project. The archaeologist will coordinate all monitoring and sampling activities with the safety officers for the contractors to ensure that proper safety regulations and protective measures meet compliance. Close coordination will also be maintained with construction representatives in order to adequately inform personnel of the possibility that open archaeological units or trenches may occur in the APE.

8. As necessary, verbal and/or written reports will be made to the HPO and any other agencies as requested. HPO maintains the right to inspect the APE at any time to ensure the provisions of this monitoring plan are being met.

## LABORATORY ANALYSIS

All non-burial artifacts and samples collected during the project will undergo analysis at the AA laboratory near Garapan. AA may inquire with HPO on temporarily curating some samples (i.e., ceramic sherds) for further analysis at their Honolulu laboratory and would provide a list of samples and chain of custody letter for the artifacts to briefly leave the CNMI. Photographs, illustrations, and all paper and electronic documents accumulated during the project will be curated at the Honolulu laboratory of AA. All collected artifacts and midden samples will be cleaned, sorted, counted, weighed (metric), and analyzed (both qualitative and quantitative data), with all data recorded on standard laboratory forms. Midden samples will be

minimally identified to major class (e.g., bivalve, gastropod mollusk, echinoderm, fish, bird, and mammal). Digital photographs with scales will be taken of a representative sample of the diagnostic artifacts. Tables and text discussing the artifact and sample results will be provided in the report, along with appropriate digital photographs.

Samples (wood charcoal, shell, non-human bone) identified as potentially suitable for dating from an undisturbed context (e.g., cultural layer, pit feature) shall be considered for radiocarbon dating. After approval by HPO and prior to submittal to the radiocarbon laboratory, potential wood charcoal samples may first be submitted to Sunrise Archaeology Archaeobotanical Services in New Zealand (Jennifer M. Huebert, Ph.D.) for wood taxa identification. Samples identified as short-lived endemic species will be preferred for dating purposes.

All stratigraphic profiles and plan view maps of identified historic properties (e.g., sites, cultural layers, features) shall be drafted for presentation in the final report. Photographs of project work, including overviews, and of individual profiles, cultural layers, and features shall also be included in the final monitoring report.

## CURATION

All collected non-burial materials will be curated in the laboratory of AA on Saipan until a final disposition repository location is determined in consultation with the HPO.

## REPORTING

All historic properties (non-burial and burial) identified and/or further documented during archaeological monitoring (e.g., cultural layer, pit features, buried walls) shall be assessed for site significance and an effect determination will be made. This information shall be included in the final report, along with recommendations for future mitigation.

An end of fieldwork (EOF) letter will be submitted to the HPO within 10 days of the completion of monitoring. An Archaeological Monitoring Report (AMR) shall be submitted within 90 days of the completion of fieldwork.

## DATA RECOVERY INVESTIGATIVE PROCEDURES

Archaeological monitoring is the primary mitigation strategy for this CTE center project. However, if significant cultural deposits are identified, the HPO will be consulted and data recovery may be conducted. Given the known presence of the Latte site in the APE, data recovery may be warranted. The following presents the procedures for data recovery, if needed.

The investigative procedures are described in terms of 1) contextual research; 2) field protocol; 3) data analyses; 4) disposition of materials; and 5) schedule of deliverables. These procedures are proposed to meet the goal of identifying, documenting, and evaluating archaeological or historical resources potentially encountered in the APE.

### DATA RECOVERY PERSONNEL

Archaeological personnel for the data recovery fieldwork will include Michael F. Dega, Ph.D. (Principal Investigator), David Perzinski, B.A., and/or Trevor Iliff, B.A. and Derek Butler, B.A. M. Dega's qualifications exceed Secretary of Interior (SOI) standards. Additional specialists are available to perform other duties during the project, including a GIS specialist (Kepa Lyman, M.A.) and project osteologist (Christopher King, Ph.D.). M. Dega will work with Darlene Moore, M.A. on ceramic analysis as needed. G. Tome will analyze all Historic-era artifacts. All personnel for this research meet the U.S. Secretary of the Interior's standards for the specific type of work being performed.

### CONTEXTUAL RESEARCH

Contextual research will focus on documentary and archival records relevant to evaluate and interpret archaeological and historic resources in the APE, largely dependent on the actual project findings. The "project context" section of this planning document provides the basic information necessary to frame the current work. Prior archaeological reports are available at the libraries and collections of MARC, the CNMI Historic Preservation Office, the CNMI Museum, and the Northern Mariana Islands Humanities Council. Additional archaeological, historical, cultural, and general environmental information may be available in documents and archives at the same facilities as well as at Northern Marianas College on Saipan. External archival searches may also be made at Hamilton Library (University of Hawaii) and the B.P. Bishop Museum, both in Honolulu.

**DATA RECOVERY FIELD PROTOCOL**

Prior to conducting any field effort, all personnel will need to be briefed by the project's site safety/UXO officer (Trevor Iliff or Derek Butler). Other rules will apply for work in and around excavation areas, as well as in the vicinity of mechanical equipment.

If HPO recommends data recovery in the APE, all excavation will be done manually to assess the significant deposit. Manual testing would be conducted within the trench area and outside the trench footprint, as directed by HPO, to define the feature boundary outside the trench.

Data recovery excavation will proceed by 10-centimeter (cm) levels within natural strata. Excavated soil volume will be screened on-site through 1/4-inch hardwire mesh to ensure maximum recovery of cultural materials.

The locations of all work actions, findings, features, and relevant geographic reference points will be recorded by a survey-grade (sub-meter accuracy) global positioning system (GPS; Trimble Geo 7x). Each test unit, trench, and significant find will be recorded with a unique reference number and annotated with information about what is being recorded. In addition, all features will be fully recorded, including scaled plan and profile illustrations, text descriptions, scaled before and after photographs, GPS plotting, and soil and stratigraphic information.

Where cultural deposits are present, the cultural deposit will be fully excavated, with appropriate analyses conducted of all items, including potsherds, midden, and other "bulk items." In cases where specific isolated artifacts, charcoal, or other cultural materials are observed, they will be recorded *in situ* and will be collected individually rather than as parts of bulk samples.

In addition, measured soil samples may be collected for later analysis. Locations of samples will be specified in profile illustrations. Sample volumes will be measured in liters, using standard-sized bags or graduated buckets. Samples will be retained in bulk for later wet-screening through 1/8-inch wire mesh to ensure maximum recovery of archaeological and historical material. In cases where specific isolated artifacts, charcoal, or other cultural materials are observed, they will be recorded *in situ* and will be collected individually rather than as parts of bulk samples.

If human remains are identified, then "Procedures for the Treatment of Human Remains" adopted by the CNMI in 1999 will be followed (see Appendix A). If this class of remains is identified, archaeological personnel will halt all work in the immediate location of the discovery and consult with the CNMI Historic Preservation Office.

Excavation profiles will be recorded by photographs, scaled illustrations, and textual descriptions. Photographs will include a visible scale-bar or scale reference, and each image will be accompanied by a register of the date, photographer, direction of view, and subject matter. Scaled illustrations will show the stratigraphic layers and positions of significant findings. The textual descriptions will refer to color, texture, consistence, matrix, boundary interface, and other characteristics of the sedimentary units in each excavation profile.

Samples of sediments may be retained for detailed studies of constituent particles and possible preserved paleobotanical remains. These samples would be destroyed entirely during analysis.

**DATA ANALYSES**

Data analyses will involve mapping and APE geographic/landscape information, natural and cultural stratigraphy, and recovered artifacts, midden, and other materials. Analysis will occur on Saipan at the AA lab in Garapan or Honolulu. Samples of charcoal and sediments may be sent to external laboratories (*i.e.*, Beta Analytic, Florida; Sunrise Archaeology) for specialized analysis such as radiocarbon dating or identification of plant species residues.

Digital mapping data and other geographic information will be integrated into a single geographic information system (GIS) database for consistency of reference and ease of management. All data will be compiled in Universal Transverse Mercator (UTM) Zone 55 North, using the World Geodetic Survey (WGS) datum of 1984 for compatibility with existing GIS data currently used by local and federal agencies operating in the CNMI.

Stratigraphy will be recorded in the field, as noted, but later analysis will involve formulation of a comprehensive stratigraphic sequence for the data recovery area.

Measured bulk samples from field collections may be wet-screened through 1/16-inch (1.6-mm) or 1/8-inch (3.2-mm) wire mesh to facilitate identification of artifacts, charcoal, shellfish remains, and non-human animal bones.

All recovered material types will be separated for more specific identification, with counts and weights tabulated.

Artifacts will be compared with forms and functions of other known specimens, also compared with reference collections. Non-human animal remains (*e.g.*, shells and bones) will be identified to the Genus or other lowest taxonomic unit possible.

Any human remains will be analyzed in accordance with the procedures as indicated in Appendix A.

A minimum number of samples of charcoal, sediments, or other materials will be collected. Radiocarbon dating will be performed for selected charcoal samples at Beta Analytic, Inc. in Florida.

If appropriate samples of sediments are available for study of possible pollen, phytoliths, and starch residues, then samples may be exported to Microfossil Research, Inc. in New Zealand.

**DISPOSITION OF MATERIALS**

All excavated artifacts and other archaeological materials will be temporarily curated at the AA laboratory near Garapan. Long-term curation would allow for transferring the collection to the CNMI Museum or HPO.

**DATA RECOVERY SCHEDULE OF DELIVERABLES**

This field effort would begin according to the client's schedule but only after this research design is approved by the HPO. Upon completion of the monitoring and/or data recovery work, an end of fieldwork (EOF) letter will be prepared and submitted to HPO within 10 days of the completion of fieldwork. The EOF will summarize the work conducted, results, and the recommendations. Within three months of fieldwork completion, AA shall submit to the HPO a draft report for review and comment. AA shall address any comments and submit a final report within one month of receiving comments.

## UNEXPLODED ORDNANCE PROTOCOL

If Unexploded Ordnance (UXO) is found or is suspected, all work within a 10 m area will halted until a qualified UXO technician inspects the find. Small arms ammunition (i.e. 0.50 cal rounds or smaller) are exempt from this, though will be collected and disposed of by UXO techs. The following protocol will be followed:

1. Upon discovery of a UXO or SUSPECTED UXO, all work will cease and the archaeologist will be called to inspect the find.
2. Once it is determined to be UXO or it is UNCLEAR that it is UXO the location will be cordoned off with caution tape with a 10 m or greater buffer.
3. Once it is determined to be UXO or it is UNCLEAR that it is UXO the following parties will be notified:
    i. DPS via a call to 9-1-1 (DHS will also be notified).
    ii. Landowner/representative
    iii. UXO Disposal Team (Sgt. Macarenas, AMPRO or Navy EOD).
    iv. BECQ
    v. Any additional concerned parties (i.e., HPO, CRM, Office of the Mayor) will be notified if the UXO is in a high traffic place or may cause damage to structures, beach areas or roads.

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# APPENDIX A: PROCEDURES FOR THE TREATMENT OF HUMAN REMAINS IN THE COMMONWEALTH OF THE NORTHERN MARIANAS

Commonwealth of the Northern Mariana Islands
Division of Historic Preservation
Department of Community & Cultural Affairs
P.O. Box 500090 CK, Airport Road
Saipan, MP 96950

TEL 664-2120-25
FAX 664-2139

**Procedures for the Treatment of Human Remains in the Commonwealth of the Northern Marianas Islands**

## I. Policy Statement

It is the policy of the Division of Historic Preservation to ensure that human remains, regardless of ethnic affiliation, are protected from disturbance whenever practical and afforded respectful treatment under all circumstances. It is also recognized that *in situ* preservation for some classes of remains is not always possible or desirable, and that ultimate disposition will be determined based on priorities established for a particular class of remains. Finally, the Division of Historic Preservation places priority on the repatriation of indigenous human remains held in museum and private collections around the world.

## II. Definition

The term "human remains" used in these procedures, refers to the complete or partial human skeletal assemblage, including dentition. Excluded from this term are purposefully-fashioned tools and implements made of human bone, such as bone spear points, needles, etc. Human bone artifacts shall be treated s artifacts rather than human remains.

## III. Classes of Human Remains

The Division of Historic Preservation recognizes four classes of human remains. These are as follows:

Class I. *Ancient Chamorro*: This class encompasses remains of the indigenous people of the Northern Mariana Islands interred on archaeological sites throughout the islands

Class II. *Pre-World War II Historic*: This class encompasses remains interred during a period starting with the resettlement of Saipan and Tinian in the early 1800s and ending at the outbreak of World War II. Human remains form this period can be expected in old cemeteries and will represent indigenous Chamorro and Carolinian populations.

Class III. *World War II*: This class encompasses the casualties of World War II While the large majority of this class of remains will be of Japanese and Okinawan affiliation, other ethnic groups may also be involved, including but necessarily limited to Chamorro, Carolinian, Korean and American.

Class IV. *Modern*: Human remains in this class encompass individuals who have been interred after World War II, including the remains of the individuals who met sudden death through natural, accidental and criminal means.

## IV. Discovery and Identification

In cases where human remains are discovered, either accidentally or through planned archaeological investigations, the first priority will be to determining to which class they should be assigned. In most instances, this will be done under the supervision of a qualified professional archaeologist with osteological training. In other cases, this determination will be made by Division of Historic Preservation staff with the guidance of the Staff Archaeologist or by the forensic specialists of the Department of Public Safety and/or the Federal Bureau of Investigation. To the extent possible, initial identification as to class will be performed *in situ*. Appropriate treatment shall then follow.

## V. Treatment

Class I:

(1) *In situ* preservation.

Top priority will be given to the *in situ* preservation of all Class I remains. Specific efforts will be made to achieve this through the redesign of the construction plans and other appropriate mitigative measures. In cases where remains are left in place, basic data will be recorded and maintained in the site files of the Division of Historic Preservation.

(2) Exhumation, analyses and reburial.

In cases where *in situ* preservation is not practical, the human remains shall be carefully and respectfully removed from the impact area under the supervision of a qualified archaeologist or Division of Historic Preservation staff. The burial will then be subjected to appropriate scientific analyses in accordance with a research design previously approved by the Division of Historic Preservation. The aim of the analyses is to expand our knowledge of and appreciation for ancient Chamorro culture. Upon completion of the analyses, human remains will be returned to the Division of Historic Preservation for reburial. Priority will be given to reburying remains at or near to the site from which they were exhumed. In cases were remains were exhumed in advance of public or private construction projects, the Division of Historic Preservation shall require the responsible party to dedicate land within the development for reburial. They will ensure that no further disturbance to this area is allowed. In most instances, such reburial sites will be marked with appropriate memorial and interpretive devices. In cases where it proves impractical or impossible to rebury remains at or near the burial site, another location shall be determined based on consultations between the Division of Historic Preservation and the responsible party. The expense of exhumation, analyses and reburial will be the borne by the responsible party.

Class II:

(1) *In situ* preservation.

Top priority will be given to the *in situ* preservation of all Class II remains. Specific efforts will be made to achieve this through the redesign of the construction plans and other appropriate mitigative measures. In cases where remains are left in place, basic data will be recorded and maintained in the site files of the Division of Historic Preservation.

(2) Exhumation, analyses and reburial.

In cases where *in situ* preservation is not practical, the human remains shall be carefully and respectfully removed from the impact area under the supervision of a qualified archaeologist or Division of Historic Preservation staff. Should the remains be terminated to be of Carolinian affiliation, they will be turned over to the Carolinian Affairs office for reburial at an appropriate location. Should the remains be Chamorro, arrangements will be made with the church to reinter the remains within an established cemetery. In both instances, ostelogical analyses will be limited to basic field operations made during the disinterment process. The expense of exhumation and reburial will be borne by the responsible party.

Class III

In cases where the remains have been determined to be those of Japanese nationals:

(1) Exhumation, temporary storage and repatriation.

Depending on the circumstances, the human remains shall either be disinterred under direction of the Division of Historic Preservation, or in cases of mass graves, with the assistance of the Japanese Ministry of Health and Welfare. Basic osteological field observation shall be made. In cases where live ordnance is present, the division of Historic Preservation shall notify the Emergency Management Office for assistance. Special attention shall be directed to recovering artifacts that might aid in determining the identity of the individual. In accordance with an agreement between the Ministry of Health and Welfare and the Division of Historic Preservation, Japanese World War II remains shall be temporarily stored in a shipping container located at the Division's office at the Airport area. The remains will be kept in storage until such time as they can be officially turned over to the Japanese government for cremation and repatriation to Japan.

In cases where the remains are identified as being of Carolinian or Chamorro war victims:

(1) Disinterment and Reburial

The remains will be excavated as carefully and completely as possible. Special attention shall be directed to locating diagnostic artifacts that might aid in determining the identity of a particular set of remains Basic osteological field observations shall be made. In cases where

live ordnance is present, the Division of Historic Preservation shall notify the Emergency Management Office for assistance. Should the remains be identified, the Division of Historic Preservation shall consult with surviving family members to determine an appropriate final resting spot. In other instances, the Carolinian Affairs Office and the Catholic Church will be consulted, as appropriate.

In cases where the remains are identified as being of Korean war victims:

(1) Disinterment, Temporary Storage and Repatriation

The remains will be excavated as carefully and completely as possible. Special attention shall be directed to locating diagnostic artifacts that might aid in determining the identity of a particular set of remains. Basic osteological field observations shall be made. In cases where live ordnance is present, the Division of Historic Preservation shall notify the Emergency Management Office for assistance. The remains will then be placed in temporary storage until arrangements with the Korean government can be made for repatriation.

In cases where the remains are identified as being a U.S. serviceman:

(2) Disinterment, Temporary Storage and Repatriation

The remains will be excavated as carefully and completely as possible. Special attention shall be directed to locating diagnostic artifacts that might aid in determining the identity of a particular set of remains. Basic osteological field observations shall be made. In cases where live ordnance is present, the Division of Historic Preservation shall notify the Emergency Management Office for assistance. The remains will then be turned over to the US government for final disposition.

Class IV

(1) Identification and Reburial

Should the Division of Historic Preservation suspect human remains fall into Class IV, it shall immediately notify the Department of Public Safety particularly if foul play is suspected. This shall include fully documenting the remains. Should the remains be positively identified, the next of kin shall be notified to arrange for final disposition. Should the remains remain unidentified, they will be turned over to the Department of Public Health for reburial.

## VI. Repatriated Human Remains

It is the priority of the Division of Historic Preservation to actively seek out and affect the repatriation of human skeletal collections that exist outside the Commonwealth. The large majority of such collections will comprise Class I remains. Much smaller collections of Class II remains may also be encountered. Once identified, the Division of Historic Preservation shall initiate consultation with the appropriate party to effect repatriation. Special attention

shall be directed at acquiring as much provenience data relating to the collections as possible, so that this information can be used when deciding upon reburial sites. The Division should also ensure that human remains are properly packages to avoid damage during shipment. Once acquired, these remains shall be reburied on their island of origin as consistent with class treatment.

## VII. Human Remains at the Division of Historic Preservation

A substantial collection of Class I human remains is currently in the possession of the Division of Historic Preservation. These comprise human remains disinterred in advance of construction projects prior to the establishment of these procedures. The Division shall take necessary steps to have these remains reburied at appropriate locations on Rota, Tinian and Saipan, as appropriate.

## Historic Preservation (CEST and EA)

| General requirements | Legislation | Regulation |
|---|---|---|
| Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects | Section 106 of the National Historic Preservation Act (16 U.S.C. 470f) | 36 CFR 800 "Protection of Historic Properties" |
| **References** | | |
| https://www.hudexchange.info/environmental-review/historic-preservation | | |

### Threshold

**Is Section 106 review required for your project?**

☐ No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA). (See the PA Database to find applicable PAs.)
**Either provide the PA itself or a link to it here. Mark the applicable exemptions or include the text here:**

→ *Continue to the Worksheet Summary.*

☒ No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].
**Either provide the memo itself or a link to it here. Explain and justify the other determination here:**

Attached letter from CNMI Historic Preservation Office (HPO) determines that the historic properties can be found adjacent and not within the subject projects Areas of Potential Effect.

→ *Continue to the Worksheet Summary.*

☐Yes, because the project includes activities with potential to cause effects (direct or indirect). → *Continue to Step 1.*

**The Section 106 Process**
After determining the need to do a Section 106 review, initiate consultation with regulatory and other interested parties, identify and evaluate historic properties, assess effects of the project on properties listed on or eligible for the National Register of Historic Places, and resolve any adverse effects through project design modifications or mitigation.
Note that consultation continues through all phases of the review.
Step 1: Initiate consultation
Step 2: Identify and evaluate historic properties
Step 3: Assess effects of the project on historic properties
Step 4: Resolve any adverse effects

### Step 1 - Initiate Consultation

The following parties are entitled to participate in Section 106 reviews: Advisory Council on Historic Preservation; State Historic Preservation Officers (SHPOs); federally recognized Indian tribes/Tribal Historic Preservation Officers (THPOs); Native Hawaiian Organizations (NHOs); local governments; and project grantees. The general public and individuals and organizations with a demonstrated interest in a project may participate as consulting parties at the discretion of the RE or HUD official. Participation varies with the nature and scope of a project. Refer to HUD's website for guidance on consultation, including the required timeframes for response. Consultation should begin early to enable full consideration of preservation options.

Use the When To Consult With Tribes checklist within Notice CPD-12-006: Process for Tribal Consultation to determine if you should invite tribes to consult on a particular project. Use the Tribal Directory Assessment Tool (TDAT) to identify tribes that may have an interest in the area where the project is located. Note that consultants may not initiate consultation with Tribes.

**Select all consulting parties below (check all that apply):**

☐State Historic Preservation Officer (SHPO)
☐Advisory Council on Historic Preservation
☐Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native
☐Hawaiian Organizations (NHOs)

**List all tribes that were consulted here and their status of consultation:**

☐Other Consulting Parties

**List all consulting parties that were consulted here and their status of consultation:**

**Describe the process of selecting consulting parties and initiating consultation here:**

*Provide all correspondence, notices, and notes (including comments and objections received) and continue to Step 2.*

## Step 2 - Identify and Evaluate Historic Properties

**Define the Area of Potential Effect (APE), either by entering the address(es) or providing a map depicting the APE.** Attach an additional page if necessary.

Gather information about known historic properties in the APE. Historic buildings, districts and archeological sites may have been identified in local, state, and national surveys and registers, local historic districts, municipal plans, town and county histories, and local history websites. If not already listed on the National Register of Historic Places, identified properties are then evaluated to see if they are eligible for the National Register.
Refer to HUD's website for guidance on identifying and evaluating historic properties.

**In the space below, list historic properties identified and evaluated in the APE.**
Every historic property that may be affected by the project should be listed. For each historic property or district, include the National Register status, whether the SHPO has concurred with the finding, and whether information on the site is sensitive. Attach an additional page if necessary.

Provide the documentation (survey forms, Register nominations, concurrence(s) and/or objection(s), notes, and photos) that justify your National Register Status determination.

**Was a survey of historic buildings and/or archeological sites done as part of the project?**
If the APE contains previously unsurveyed buildings or structures over 50 years old, or there is a likely presence of previously unsurveyed archeological sites, a survey may be necessary. For Archeological surveys, refer to HP Fact Sheet #6, Guidance on Archeological Investigations in HUD Projects.

☐ Yes → *Provide survey(s) and report(s) and continue to Step 3.*
Additional notes:

☐ No → *Continue to Step 3.*

## Step 3 - Assess Effects of the Project on Historic Properties

Only properties that are listed on or eligible for the National Register of Historic Places receive further consideration under Section 106. Assess the effect(s) of the project by applying the Criteria of Adverse Effect. (36 CFR 800.5)] Consider direct and indirect effects as applicable as per HUD guidance.

**Choose one of the findings below - No Historic Properties Affected, No Adverse Effect, or Adverse Effect; and seek concurrence from consulting parties.**

☐ No Historic Properties Affected
**Document reason for finding:**

☐ No historic properties present. → *Provide concurrence(s) or objection(s) and continue to the Worksheet Summary.*

☐ Historic properties present, but project will have no effect upon them. → *Provide concurrence(s) or objection(s) and continue to the Worksheet Summary.*

If consulting parties concur or fail to respond to user's request for concurrence, project is in compliance with this section. No further review is required. If consulting parties object, refer to (36 CFR 800.4(d)(1)) and consult further to try to resolve objection(s).

☐ No Adverse Effect

**Document reason for finding:**

**Does the No Adverse Effect finding contain conditions?**

☐ Yes

**Check all that apply:** (check all that apply)

- ☐ Avoidance
- ☐ Modification of project
- ☐ Other

**Describe conditions here:**

→ *Monitor satisfactory implementation of conditions. Provide concurrence(s) or objection(s) and continue to the Worksheet Summary.*

☐ No → *Provide concurrence(s) or objection(s) and continue to the Worksheet Summary.*

If consulting parties concur or fail to respond to user's request for concurrence, project is in compliance with this section. No further review is required. If consulting parties object, refer to (36 CFR 800.5(c)(2)) and consult further to try to resolve objection(s).

☐ Adverse Effect

**Document reason for finding:**

Copy and paste applicable Criteria into text box with summary and justification.
Criteria of Adverse Effect: 36 CFR 800.5]

Notify the Advisory Council on Historic Preservation of the Adverse Effect and provide the documentation outlined in 36 CFR 800.11(e). The Council has 15 days to decide whether to enter the consultation (Not required for projects covered by a Programmatic Agreement).

→ *Continue to Step 4.*

### Step 4 - Resolve Adverse Effects

Work with consulting parties to try to avoid, minimize or mitigate adverse effects. Refer to HUD guidance and 36 CFR 800.6 and 800.7.

**Were the Adverse Effects resolved?**

☐ Yes

**Describe the resolution of Adverse Effects, including consultation efforts and participation by the Advisory Council on Historic Preservation:**

| |
|---|
| |

**For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

| |
|---|
| |

→ *Provide signed Memorandum of Agreement (MOA) or Standard Mitigation Measures Agreement (SMMA). Continue to the Worksheet Summary.*

☐ No

The project must be cancelled unless the "Head of Agency" approves it. Either provide approval from the "Head of Agency" or cancel the project at this location.

**Describe the failure to resolve Adverse Effects, including consultation efforts and participation by the Advisory Council on Historic Preservation and "Head of the Agency":**

**Explain in detail the exact conditions or measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

→ *Provide correspondence, comments, documentation of decision, and "Head of Agency" approval. Continue to the Worksheet Summary.*

**Worksheet Summary**

**Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

The project is locted in Susupe, Saipan Lot# 39 H 01.
The CNMI Division of Historic Preservation Office has concurred the project has no adverse effect to historic properties.

**Are formal compliance steps or mitigation required?**

☐ Yes

☒ No

# Appendix J

# NORTHERN MARIANAS HOUSING CORPORATION

**Community Development Block Grant – Disaster Recovery (CDBG-DR) Division**

P.O. BOX 500514, Saipan, MP 96950-0514

Email: cnmi-cdbg-dr@nmhcgov.net

Website: http://www.cnmi-cdbgdr.com

Tels: (670) 233-9447
233-9448
233-9449
233-9450

Fax: (670) 233-9452


January 10, 2022

Ms. Geralyn C. Delacruz
Zoning Administrator
Zoning Board
Caller Box 10007
Saipan, MP 96950

COMMONWEALTH ZONING BOARD
SAIPAN ZONING OFFICE

Rec'd By: [signature]
Date: 01.10.2022
Time: 3:10 pm

Re: Request for Zoning Certification

Dear Ms. Delacruz,

The Northern Marianas Housing Corporation (NMHC) is in the process of preparing the Environmental Assessment Statutory Checklist (24 CFR § 58.35) for the proposed New Building replacing existing typhoon damaged facility for Public School System (PSS) Marianas High School Career and Technical Education Center located in Lot # 39 H 01, Susupe Village, Saipan.

The proposed project will be funded by the Department of Housing and Urban Development (HUD) through the Community Development Block Grant-Disaster Recovery Program (CDBG-DR).

NMHC is kindly requesting for your concurrence in certifying that the project is acceptable based on the Zoning Law. This concurrence will not constitute as approval for a permit.

If you have any questions or concerns, please do not hesitate to contact myself at drprojectmanager@nmhcgov.net or Mr. Wilfred Villagomez at projectsupervisio@nmhcgov.net or at the numbers listed above.

Sincerely,

Jonathan I. Arriola
Project Manager

Enclosures: Map of Location
Scope of Work
Floor Plan

NMHC- CDBG-DR
RECEIVED
By: Mike F
Date: 2/16/22
Time: 1430

"NMHC is an equal employment and fair housing public agency"


**Tinian Field Office**
Tel: (670)433-9213
Fax: (670)433-3690

**CDBG-DR Office**
Tel: (670)233-9447/9448/9449

**Rota Field Office**
Tel: (670)532-9410
Fax: (670)532-9441

# NORTHERN MARIANAS HOUSING CORPORATION

**Community Development Block Grant – Disaster Recovery (CDBG-DR) Division**

P.O. BOX 500514, Saipan, MP 96950-0514

Email: cnmi-cdbg-dr@nmhcgov.net

Website: http://www.cnmi-cdbgdr.com

Tels: (670) 233-9447
233-9448
233-9449
233-9450
Fax: (670) 233-9452


**(Zoning Use)**

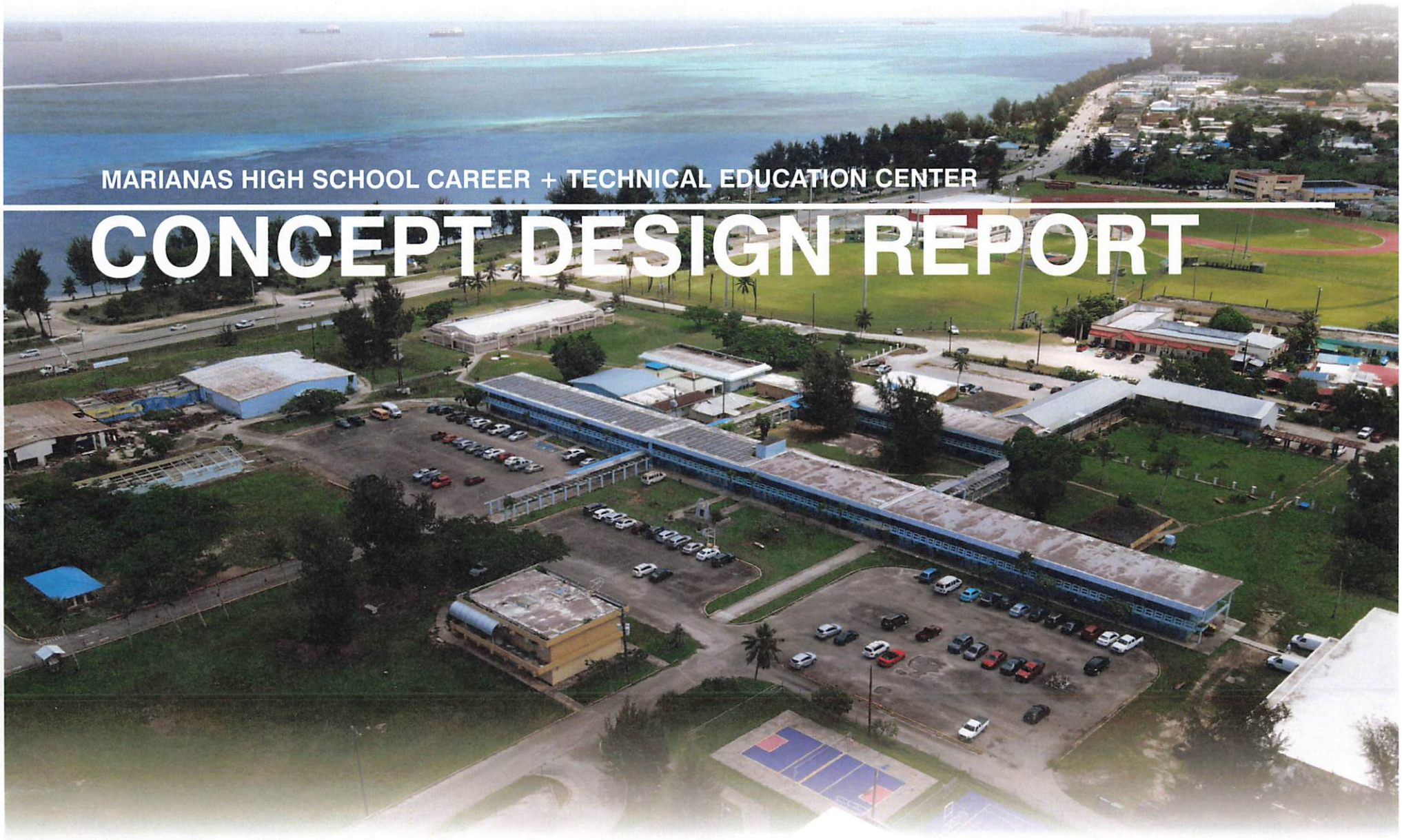
***This certification is granted to the Northern Marianas Housing Corporation (NMHC) to proceed with their project based on*** Section 404(a) ***(citation) of the Saipan Zoning Law.***

***This certification will not constitute as an approval for a permit. The NMHC and/or Contractor must apply for a permit prior to any construction work. If the NMHC and/or Contractor fails to apply for a Zoning permit, the Zoning Office will issue a violation notice and impose fines for failure to abide by the Zoning Law.***

***Certified & Concurred by:***

***Geralyn Delacruz, Zoning Administrator*** — ***Date*** 1/10/2022

# Appendix K

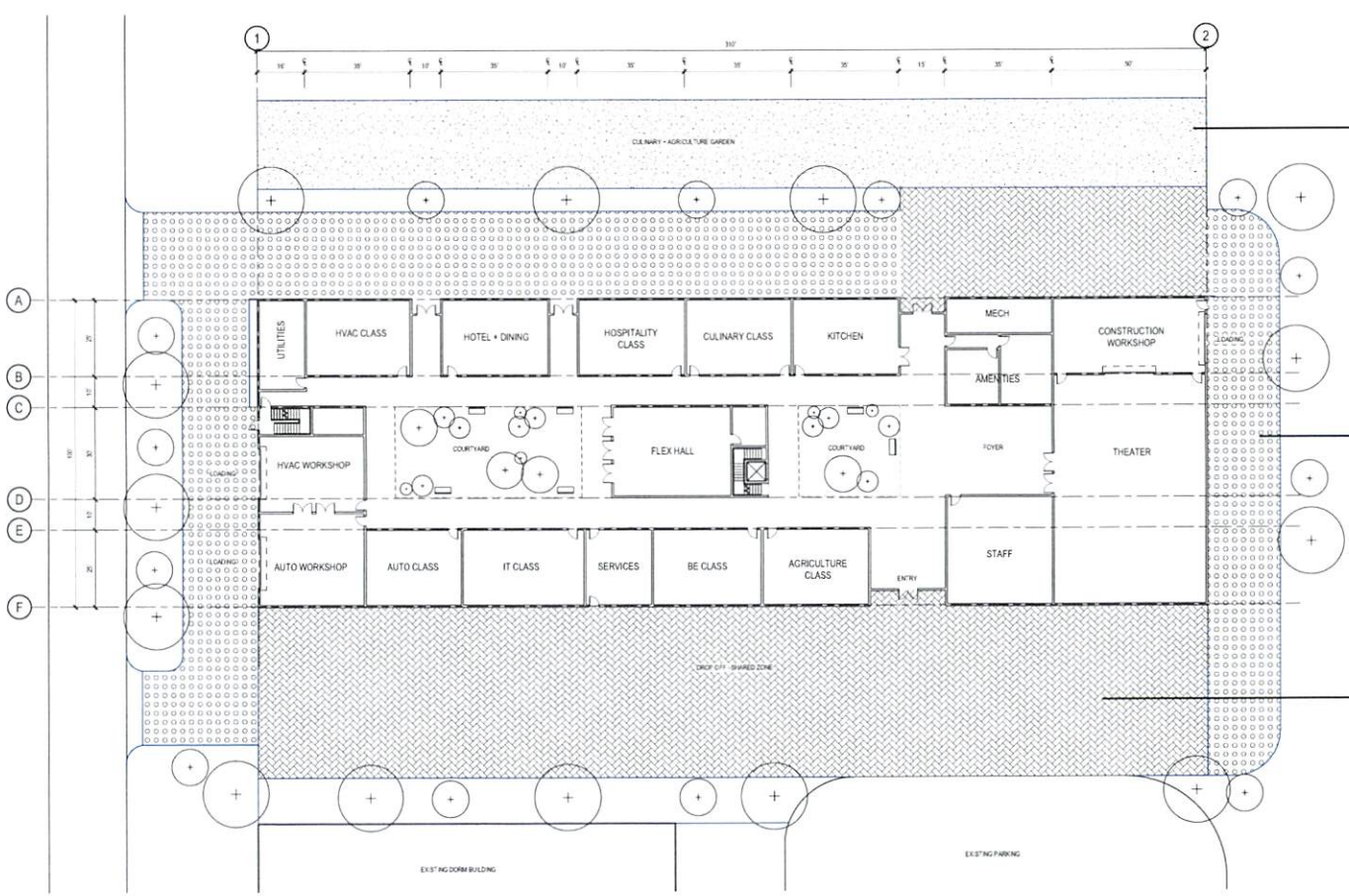


MARIANAS HIGH SCHOOL CAREER + TECHNICAL EDUCATION CENTER

# CONCEPT DESIGN REPORT

GHD

# PRELIMINARY SITE RESPONSE




Teaching garden, for culinary and agriculture programs

Permeable paving

Stone or brick paving

## OPTION 1

This option is derived from the pre-design design provided. The design relies on traditional, double-loaded corridors, which is efficient but does not relate well to the physical environment and may require more mechanical cooling than other options.

## POSITIVES

+ Relatively compact footprint

+ The flexible hall is near the Theater

+ Vertical circulation is efficient

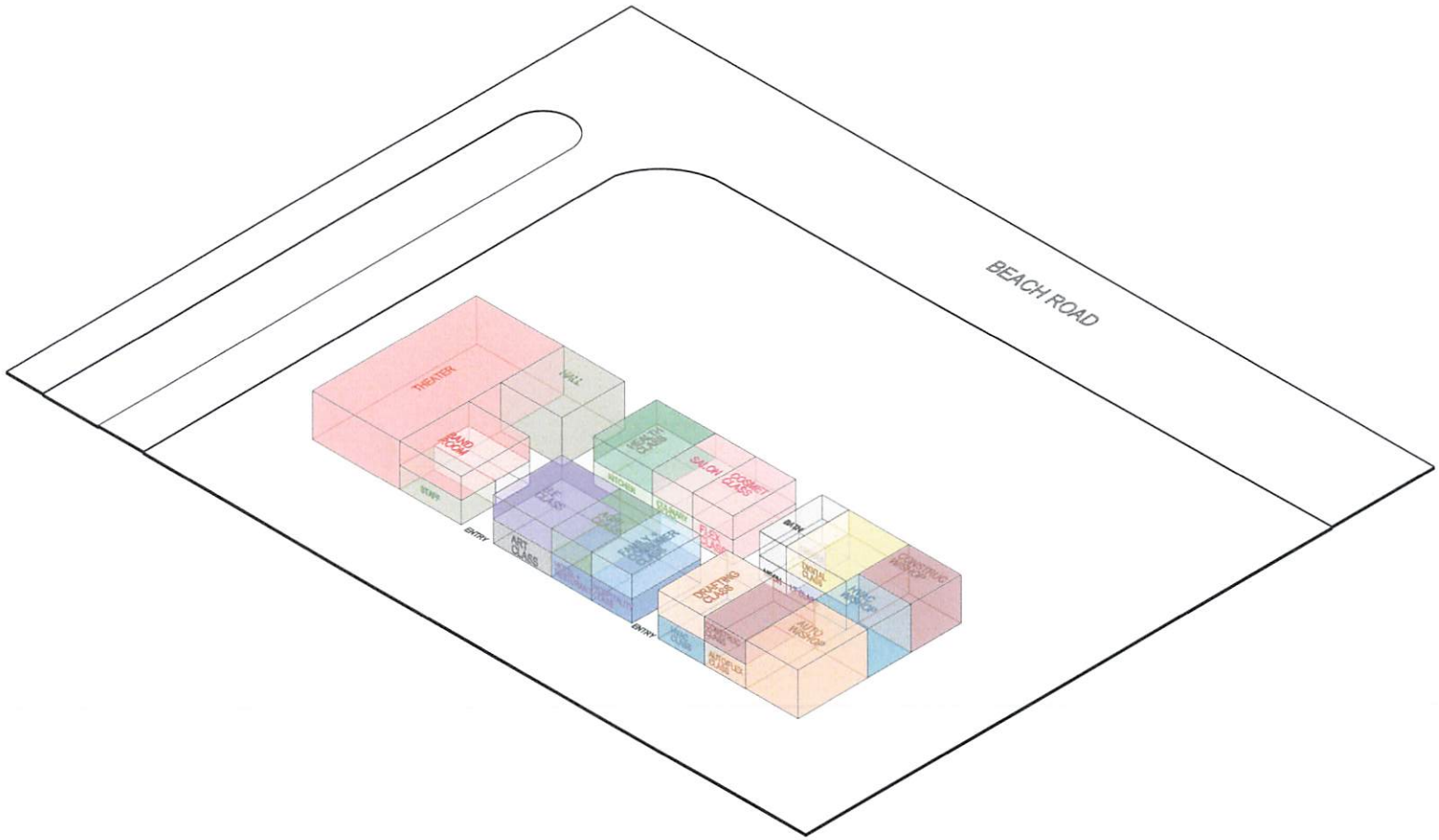
## NEGATIVES

- Ambiguous entry condition

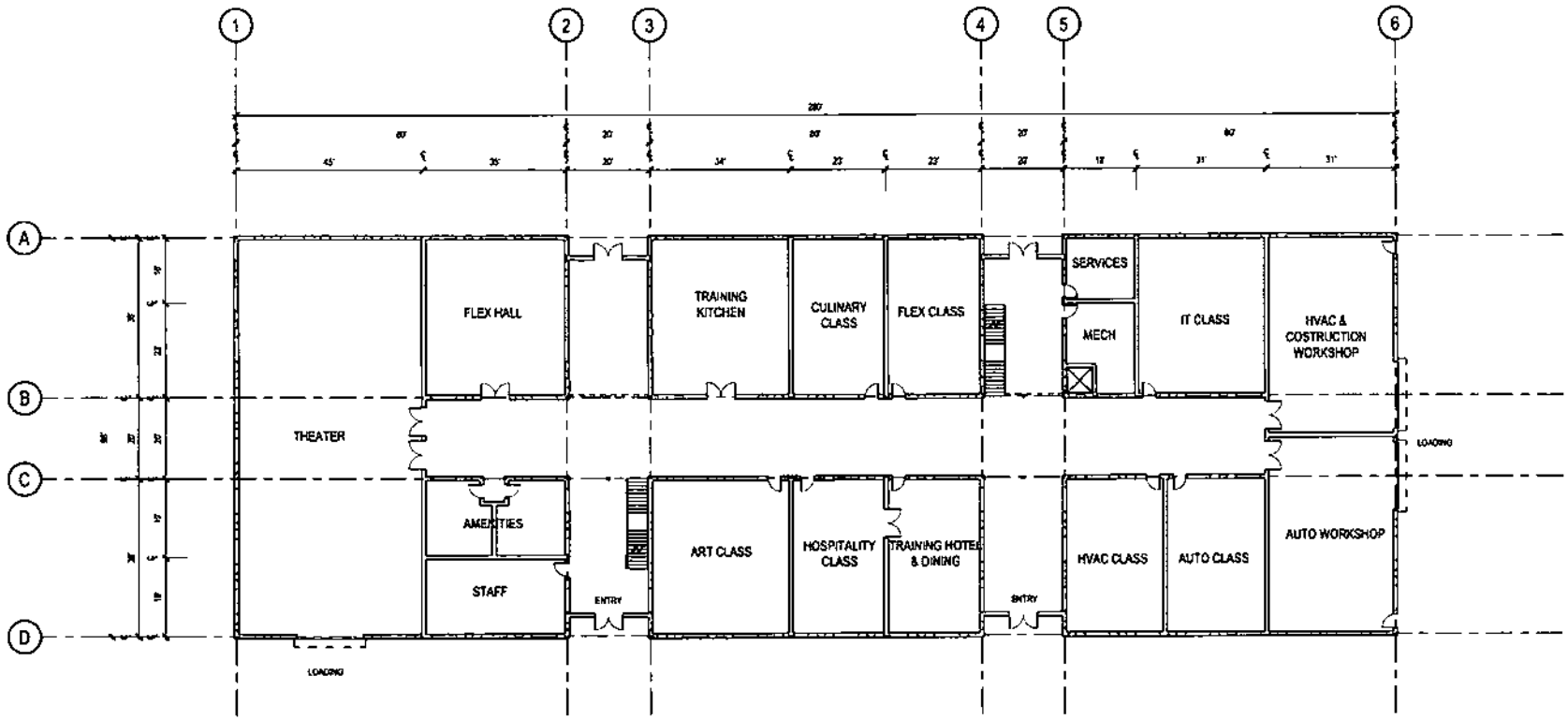
- Lack of security/oversight by staff

- Double loaded, interior corridors do not take advantage of natural air movement

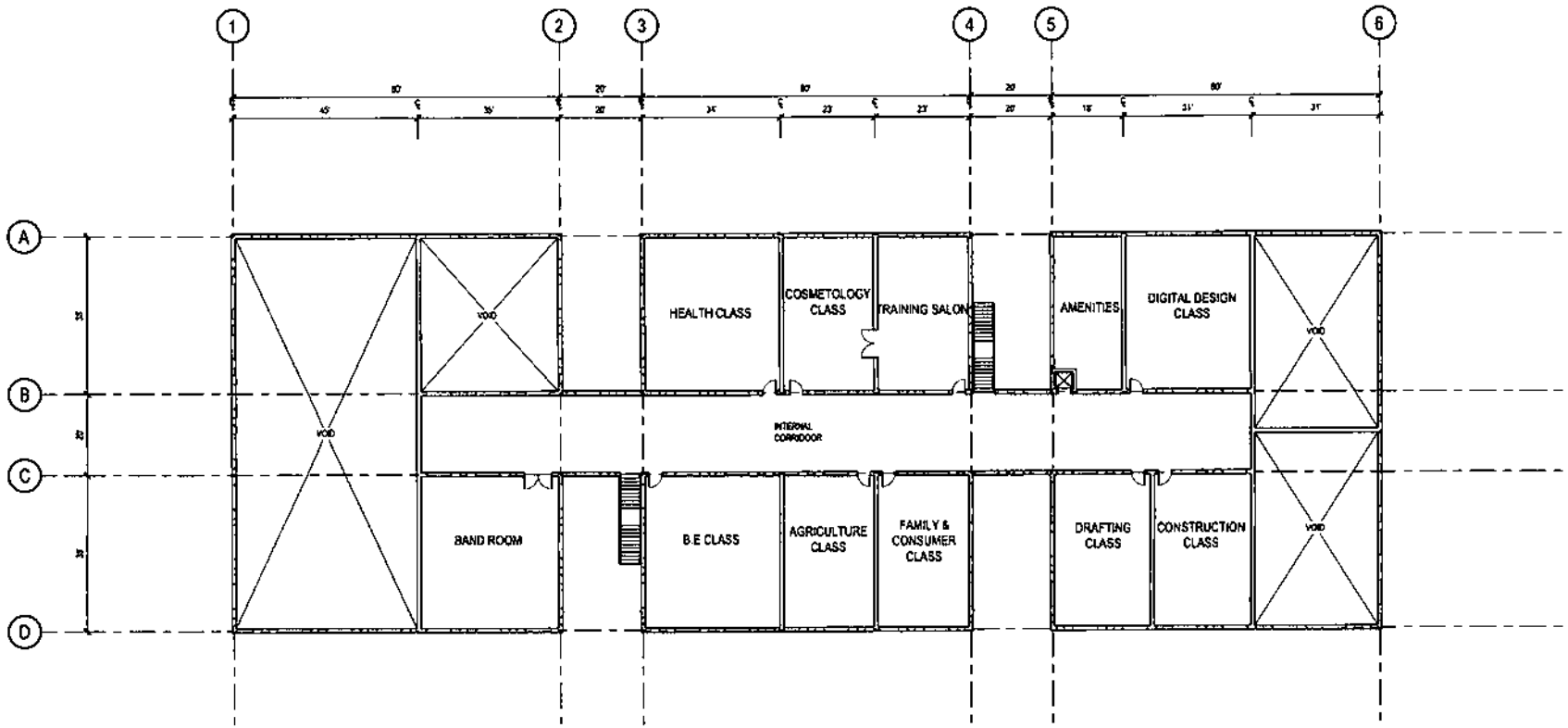
- No significant assembly, pre-function, or social spaces.



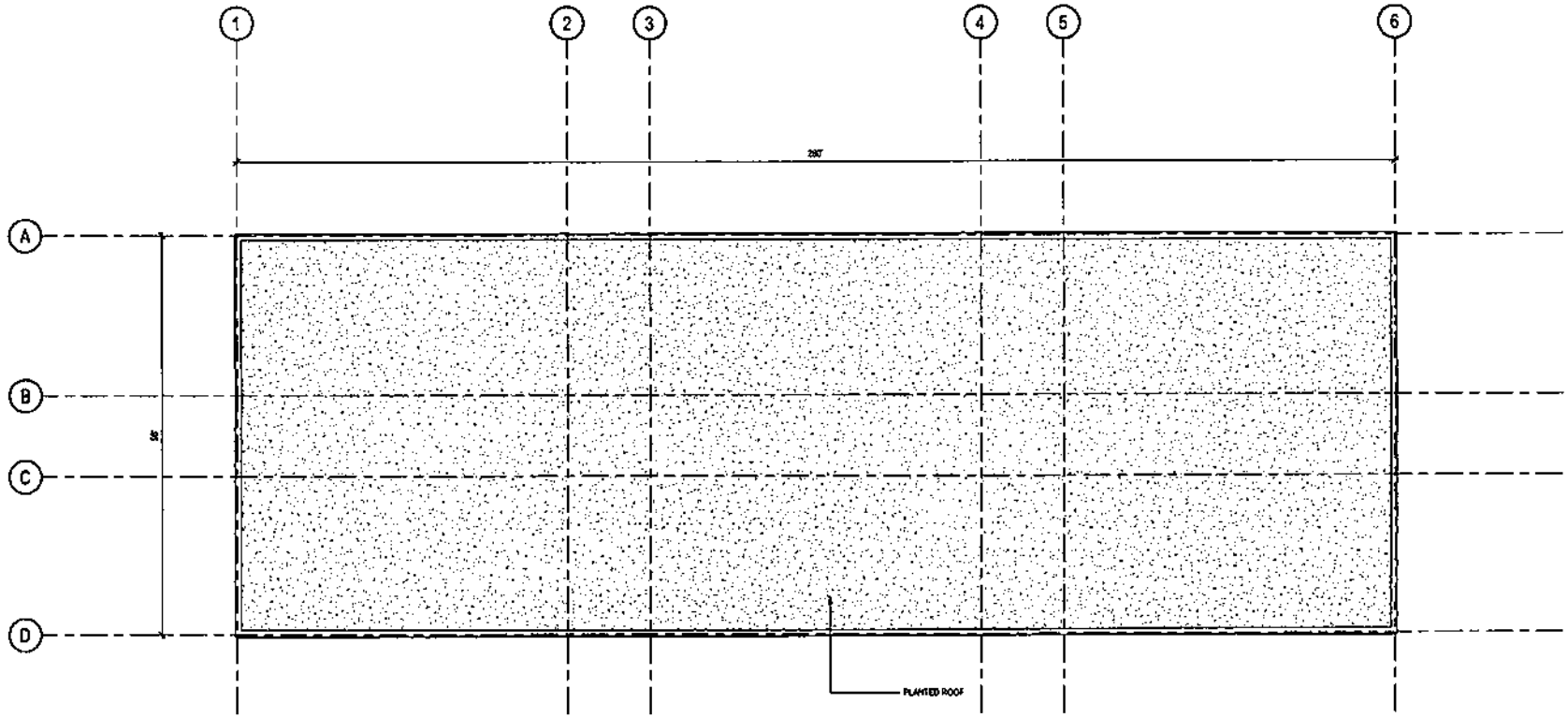

## OPTION 1 - MASSING DIAGRAM




## OPTION 1 - FIRST FLOOR PLAN




## OPTION 1 - SECOND FLOOR PLAN




## OPTION 1 - ROOF PLAN

## OPTION 2

This option consolidates the two entries of Option 1 into a single, central entryway. This layout allows for better supervision of the entry by staff. The flexible lecture hall is kept close to the theater. This solution is also primarily internalized and may require more energy-intensive efforts to remain cool throughout the year.

## POSITIVES

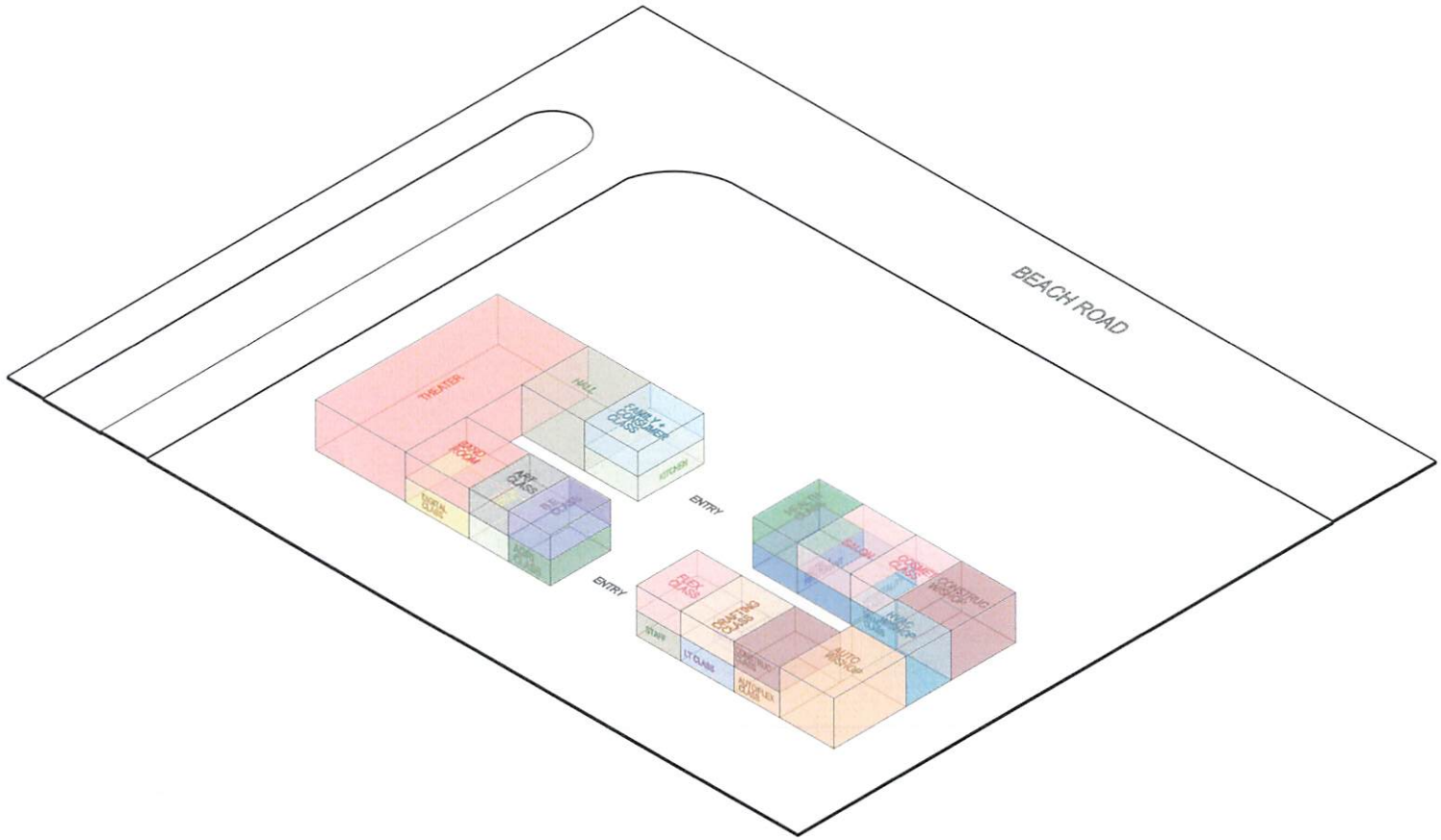
+ Compact footprint

+ Legible and more easily monitored entry

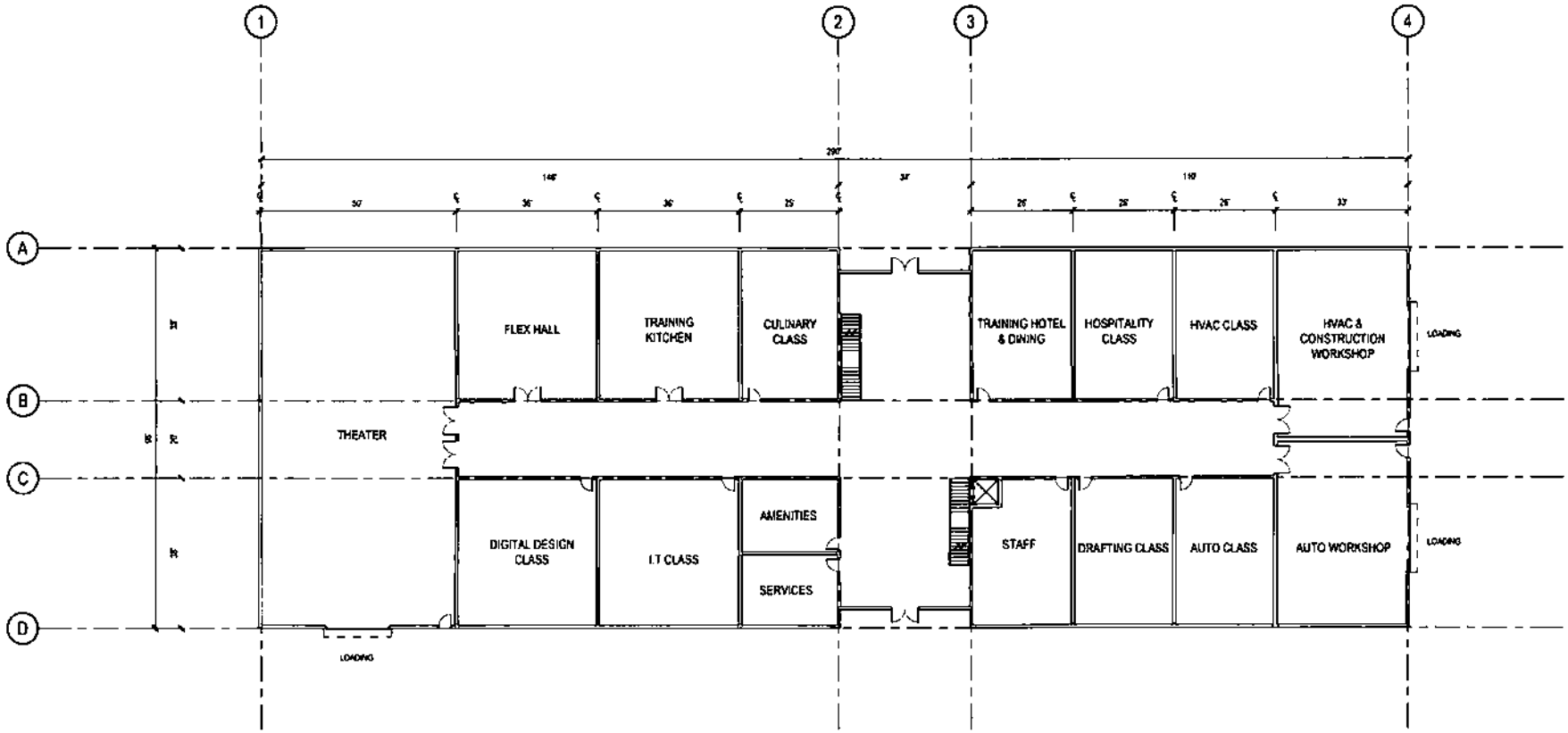
## NEGATIVES

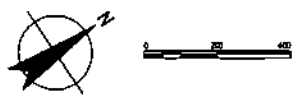
- Little pre-function or social common space

- Double-loaded corridor does not take advantage of natural air movement for cooling

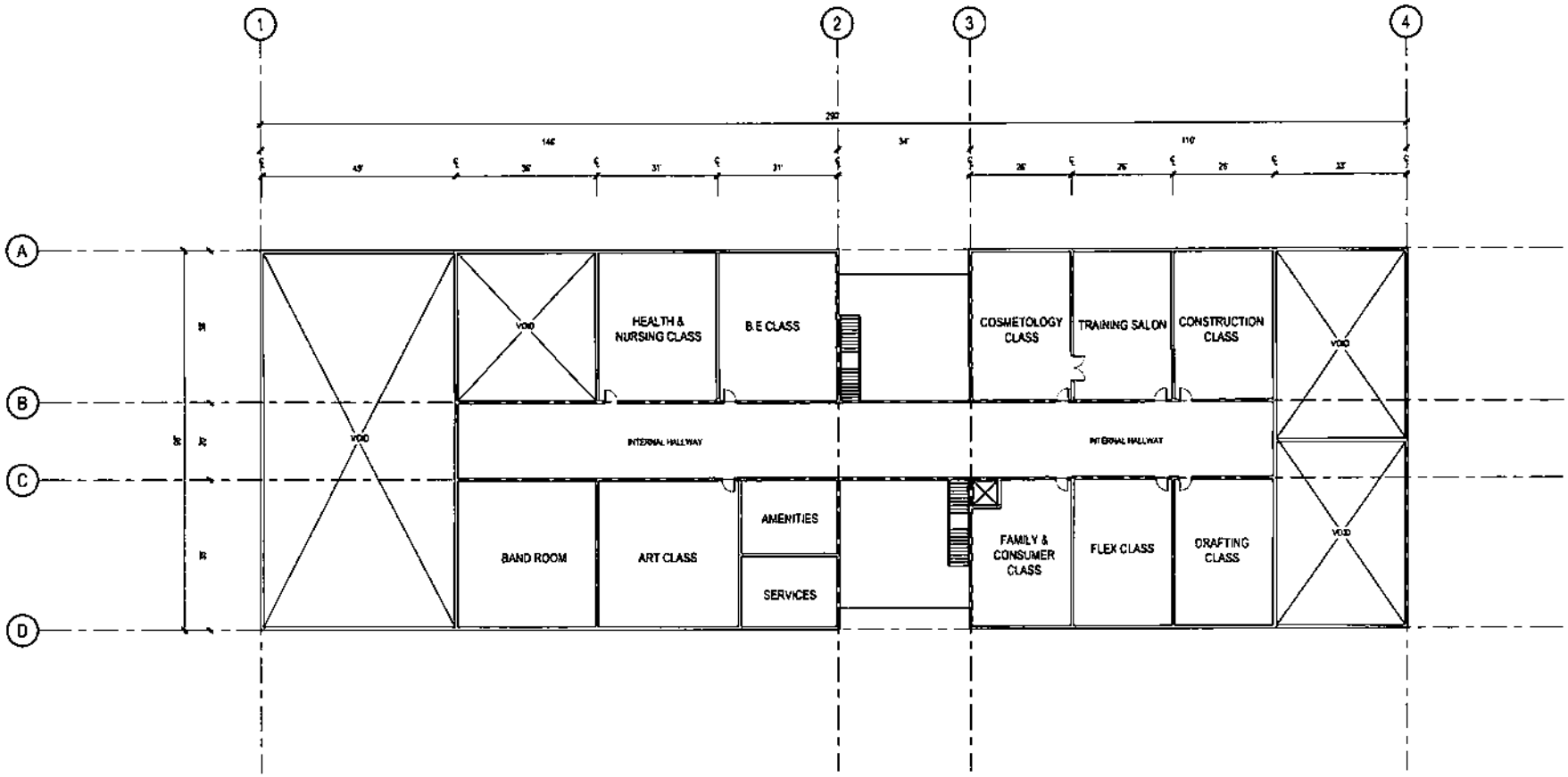



## OPTION 2 - MASSING DIAGRAM

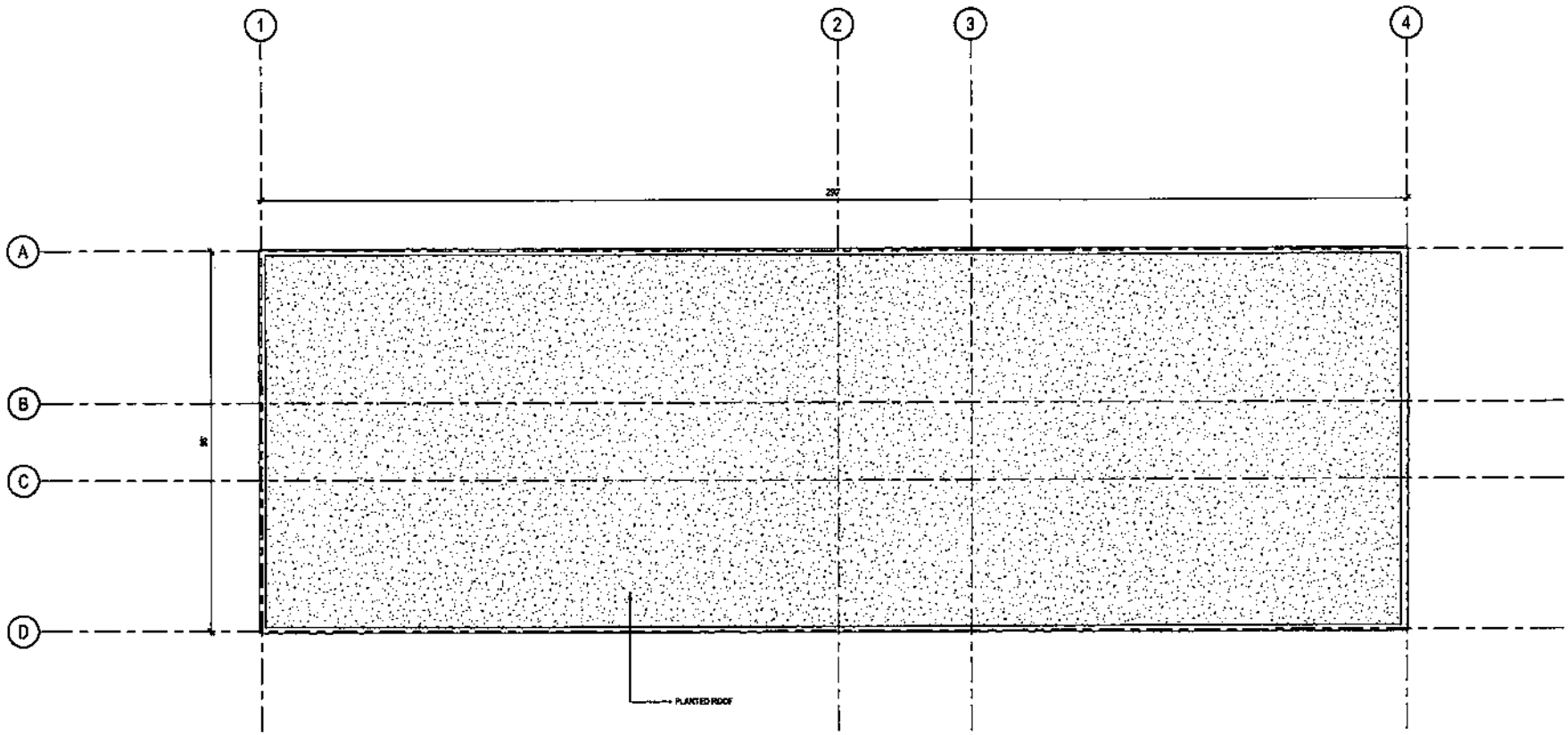



# OPTION 2 - FIRST FLOOR PLAN




## OPTION 2 - SECOND FLOOR PLAN




## OPTION 2 - ROOF PLAN

## OPTION 3

Option 3 begins to move away from double loaded corridors to single loaded, potentially allowing the classrooms to take advantage of more natural airflow. This option also features a large external forecourt outside the auto workshop. This may be used as indoor/ outdoor social space.

## POSITIVES

+ Single-loaded corridors allow better airflow and ambient cooling

+ Indoor/outdoor spaces allow flexible uses

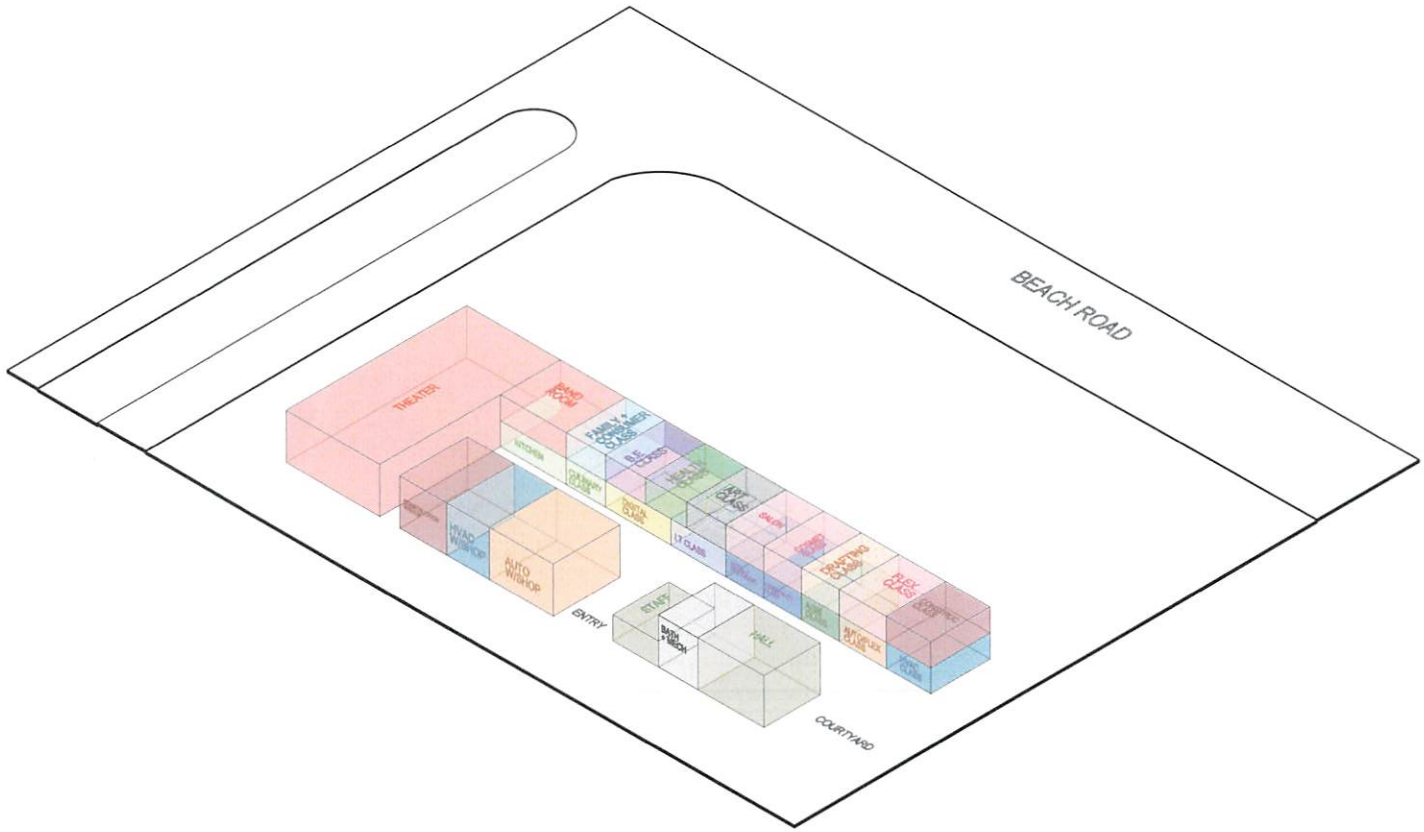
+Additional area is preserved for future expansion

## NEGATIVES

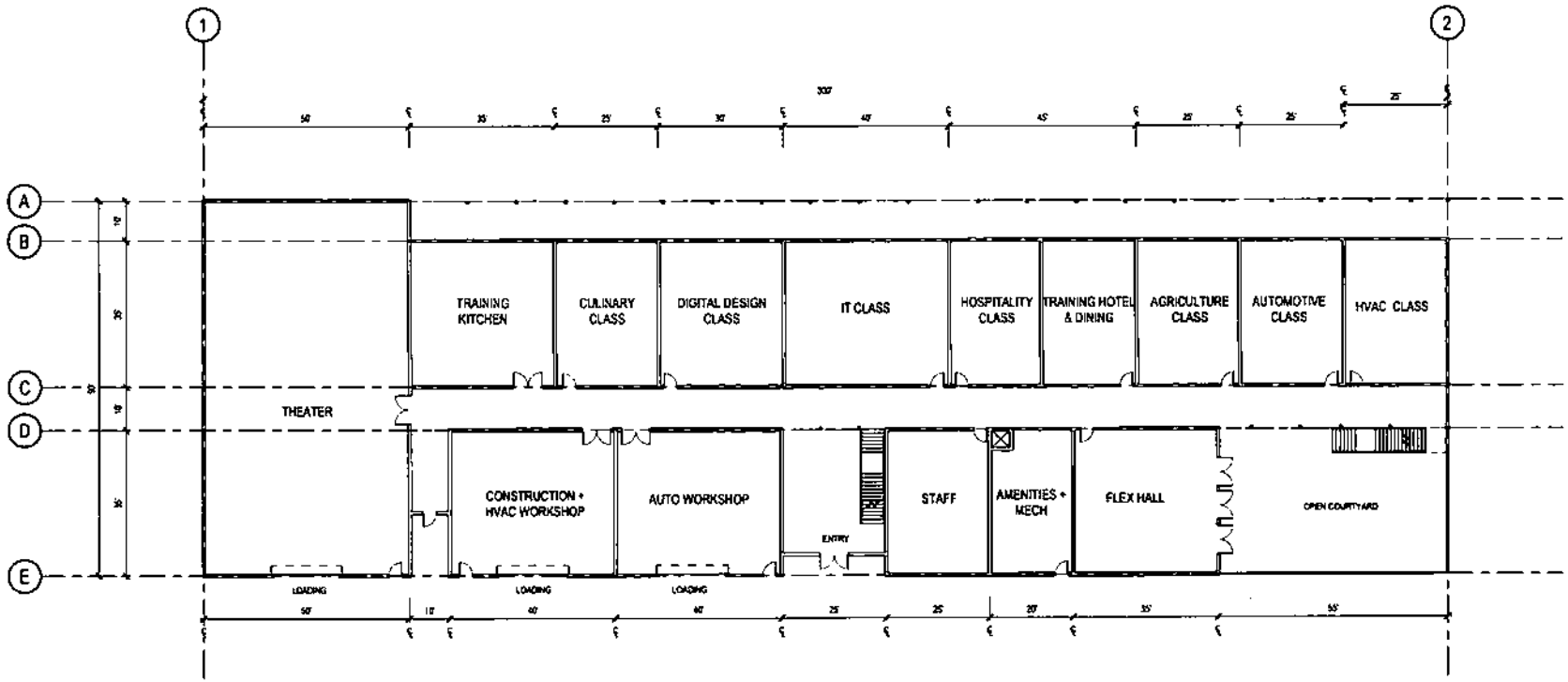
- Redundant circulation zones isolate users from each other

- Without clear programming, external forecourt may become staging area for vehicles

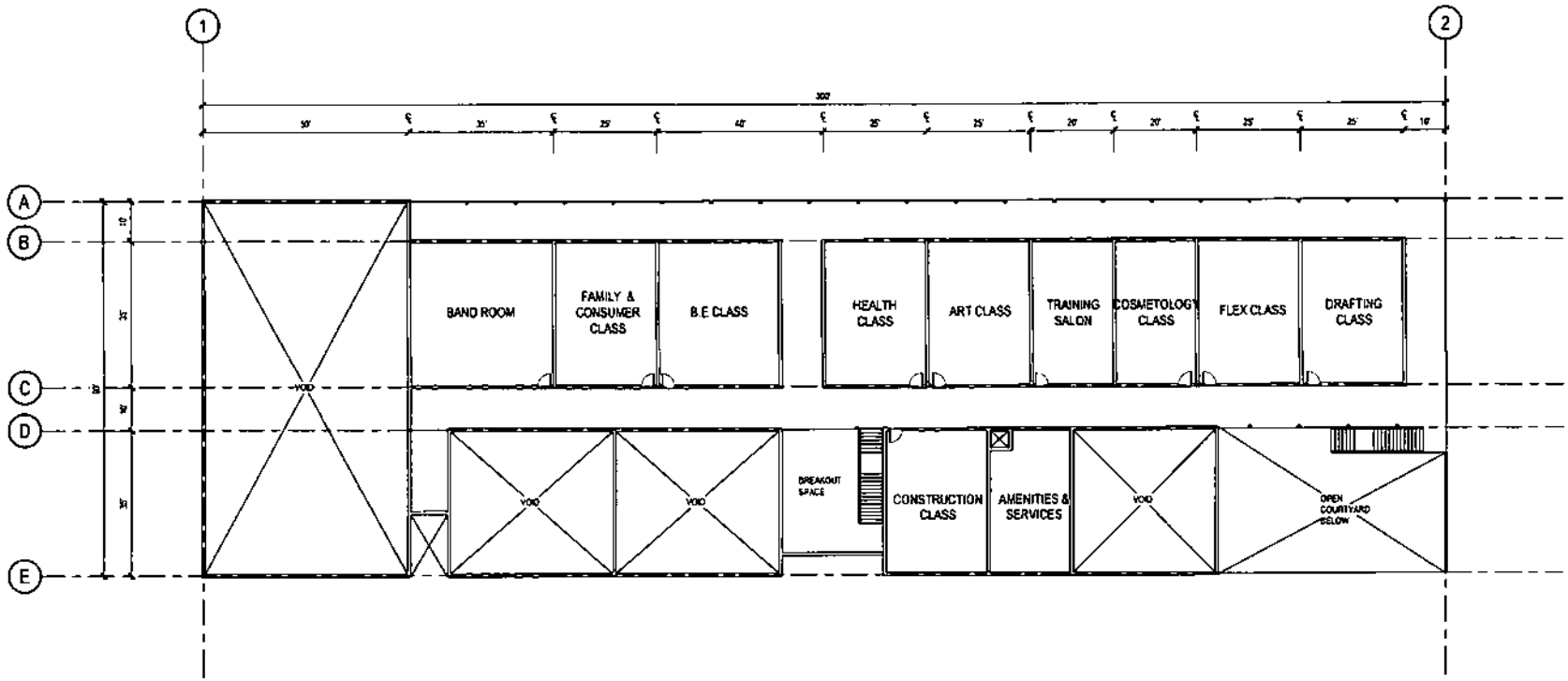
- No pre-function space for theatre

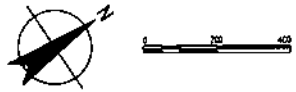



## OPTION 3 - MASSING DIAGRAM

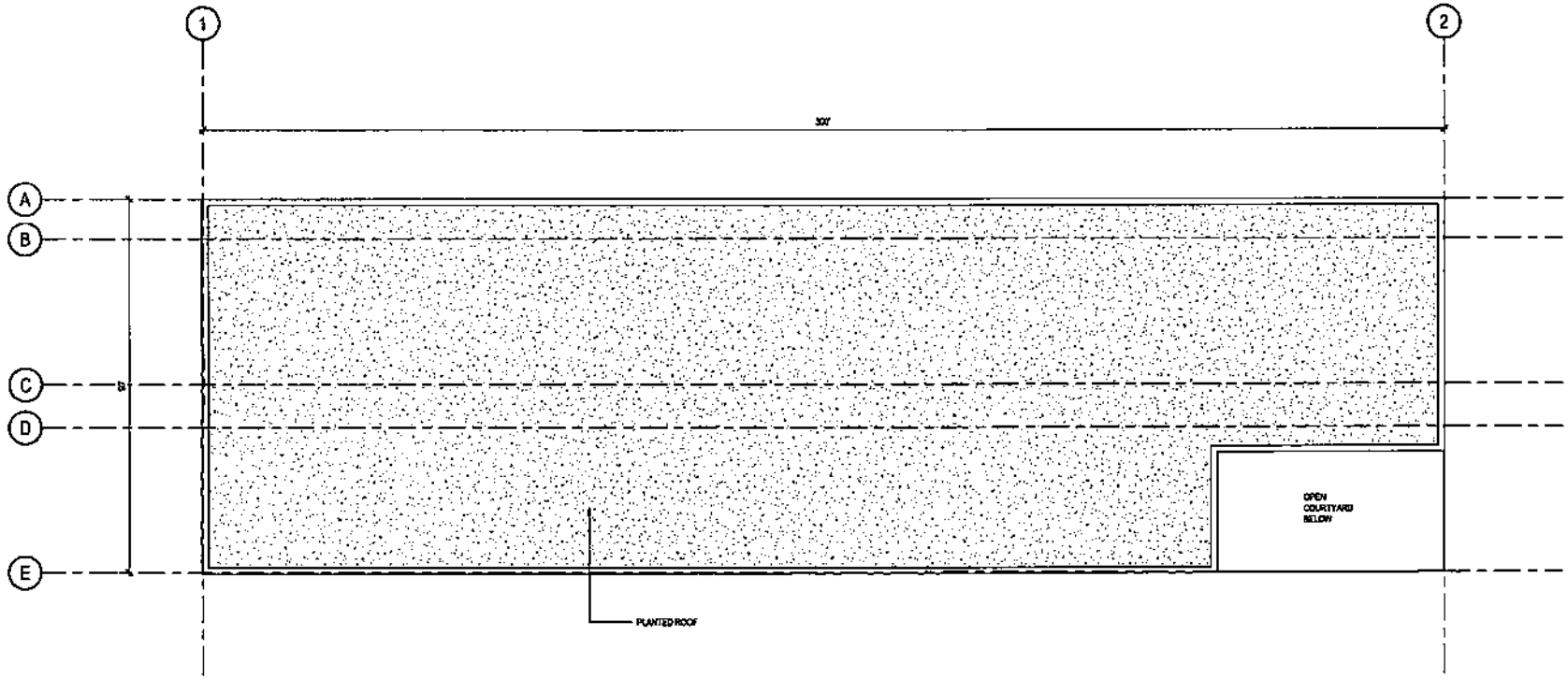



## OPTION 3 - FIRST FLOOR PLAN




## OPTION 3 - SECOND FLOOR PLAN




## OPTION 3 - ROOF PLAN

## OPTION 4

Option 4 brings circulation inward with internal walkways around two distinct planted courtyards which also act as cooling zones. The flexible study hall divides the space to create more intimate spaces and may also evolve to become an indoor-outdoor flexible space. The theater gains a prefunction space and courtyard which may be served by the kitchen. Gaps between classroom blocks allow additional cross-ventilation.

## POSITIVES

+ Indoor/outdoor space is maximized

+ Natural ventilation is increased

+ Naturally shaded social spaces within the building envelope are optimized

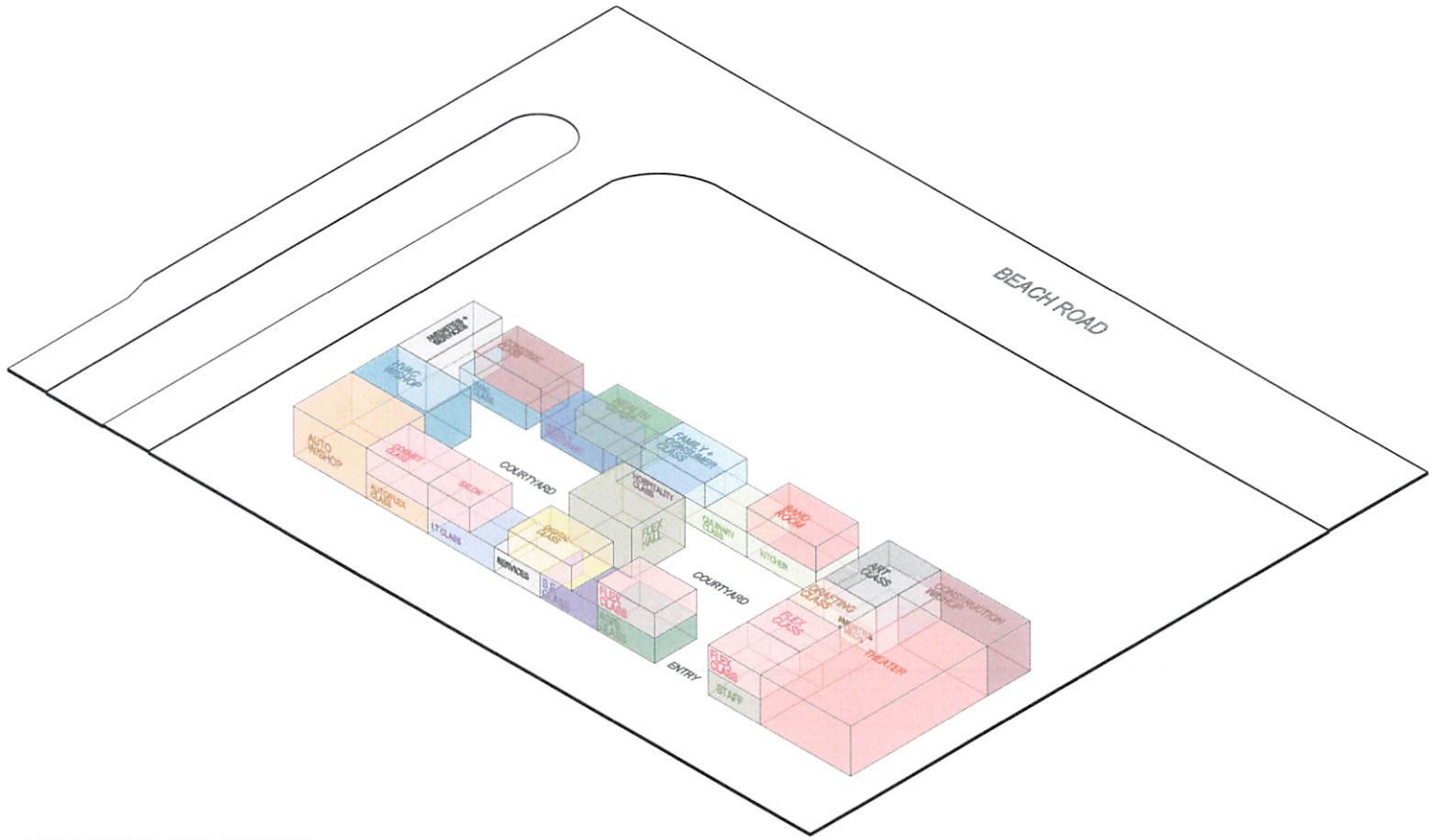
+ Set construction is ganged with the performance space

+ Gaps between classroom blocks may be used for expansion space in the future

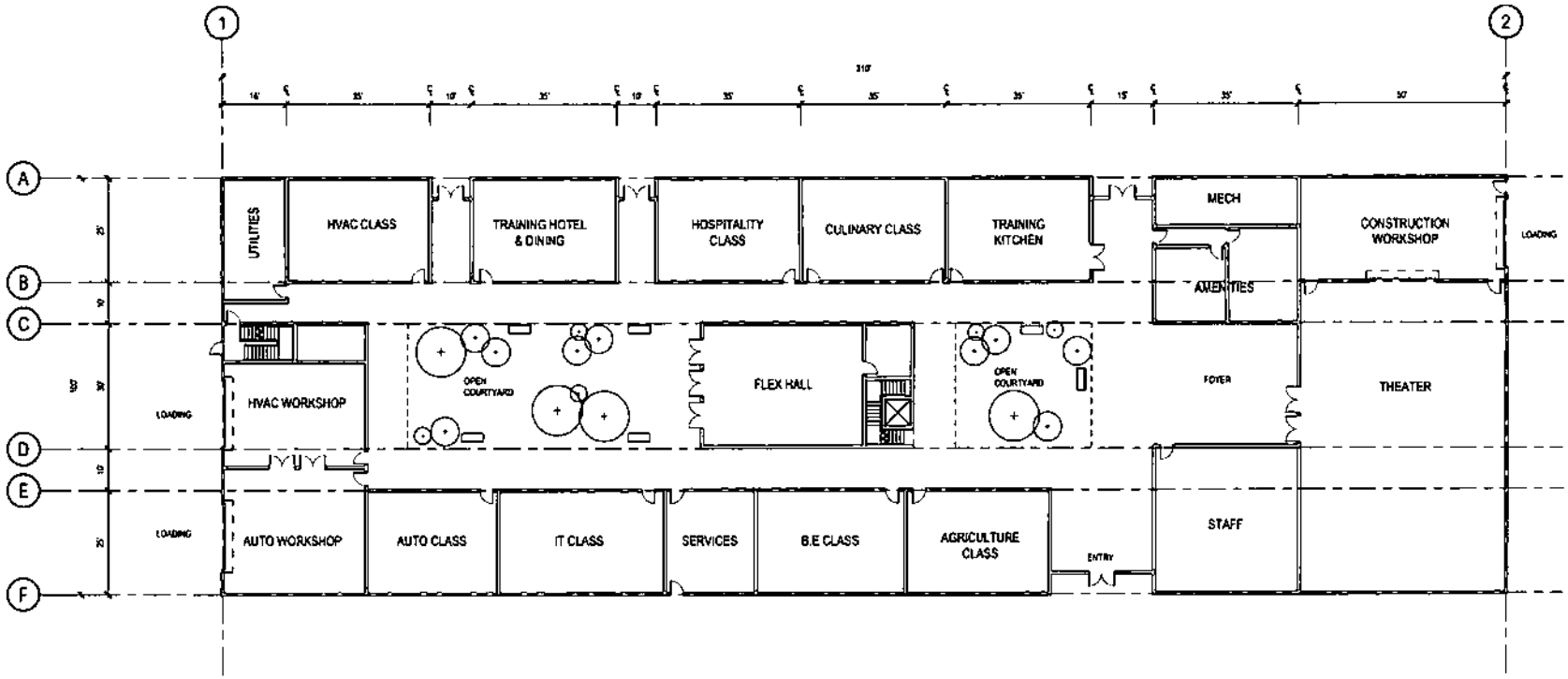
## NEGATIVES

-Planted courtyards may require more maintenance

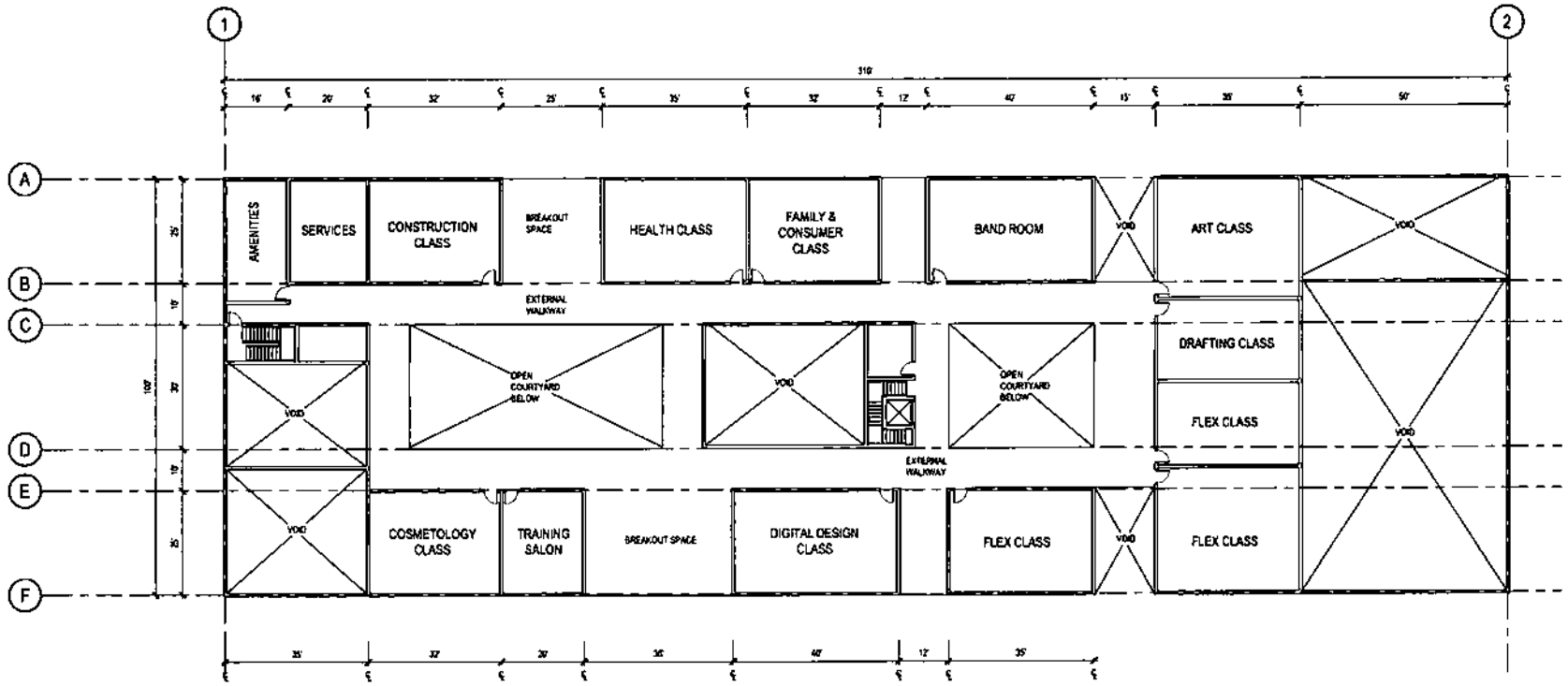
-Additional building envelope (external walls) may cost more to build



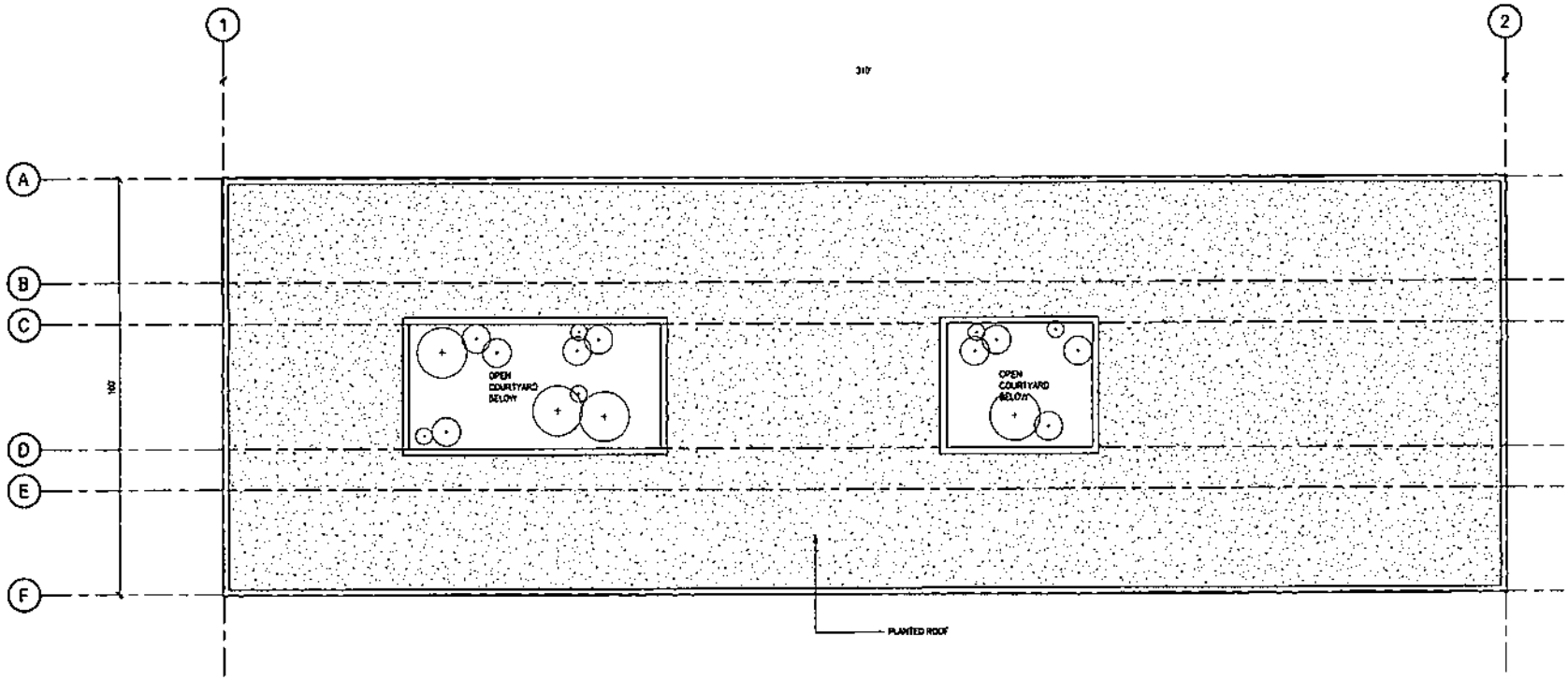

## OPTION 4 - MASSING DIAGRAM




# OPTION 4 - FIRST FLOOR PLAN




## OPTION 4 - SECOND FLOOR PLAN




# OPTION 4 - ROOF PLAN

## OPTION 5

Option 5 continues with the concept of an internal circulation core around a cooling courtyard, but moves the flexible hall to the perimeter of the building.

## POSITIVES

+ Plan is very regular and clear

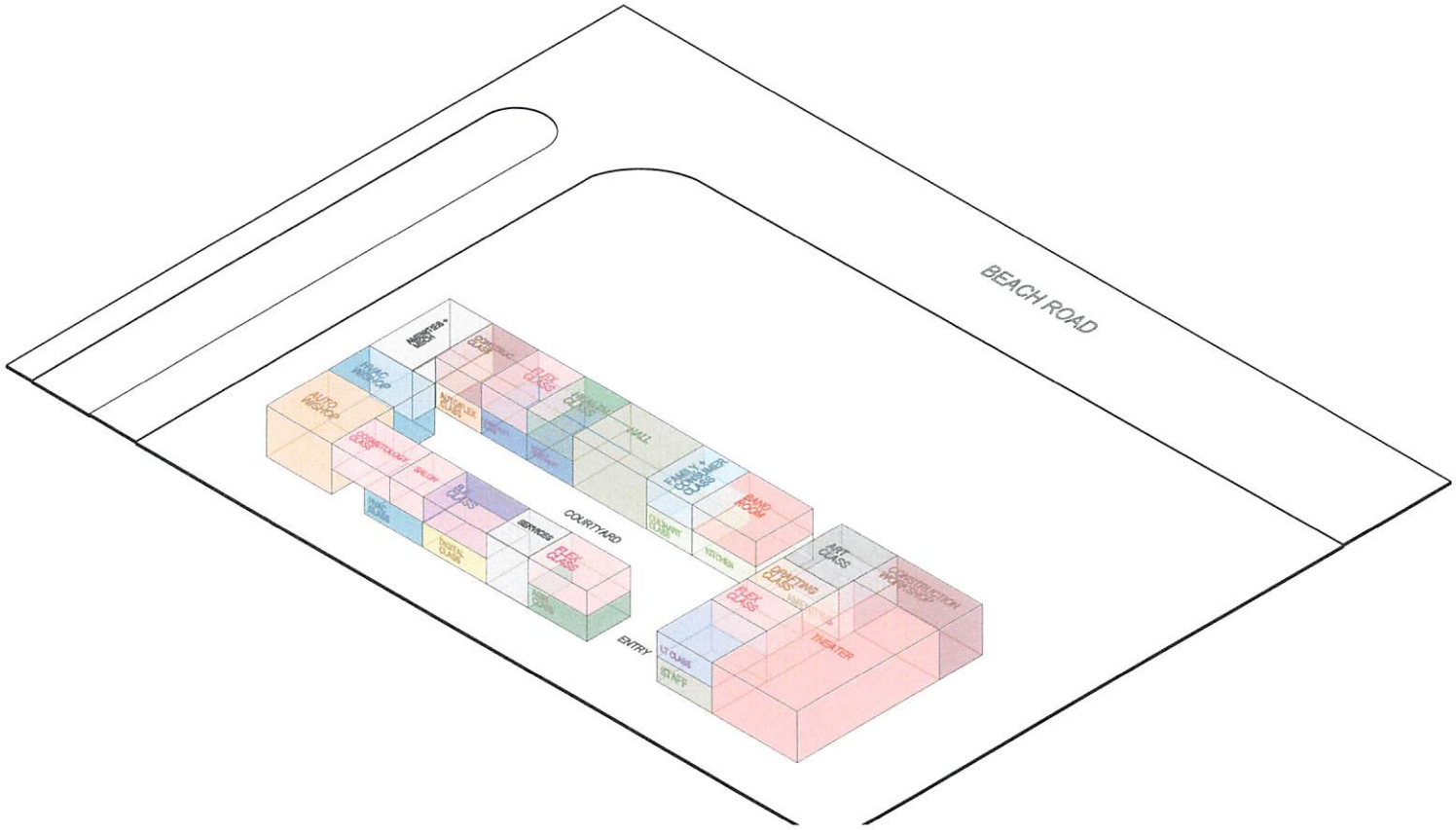
+ The central courtyard acts as a larger unifying space on to which every classroom opens.

+ A more dramatic entry hall

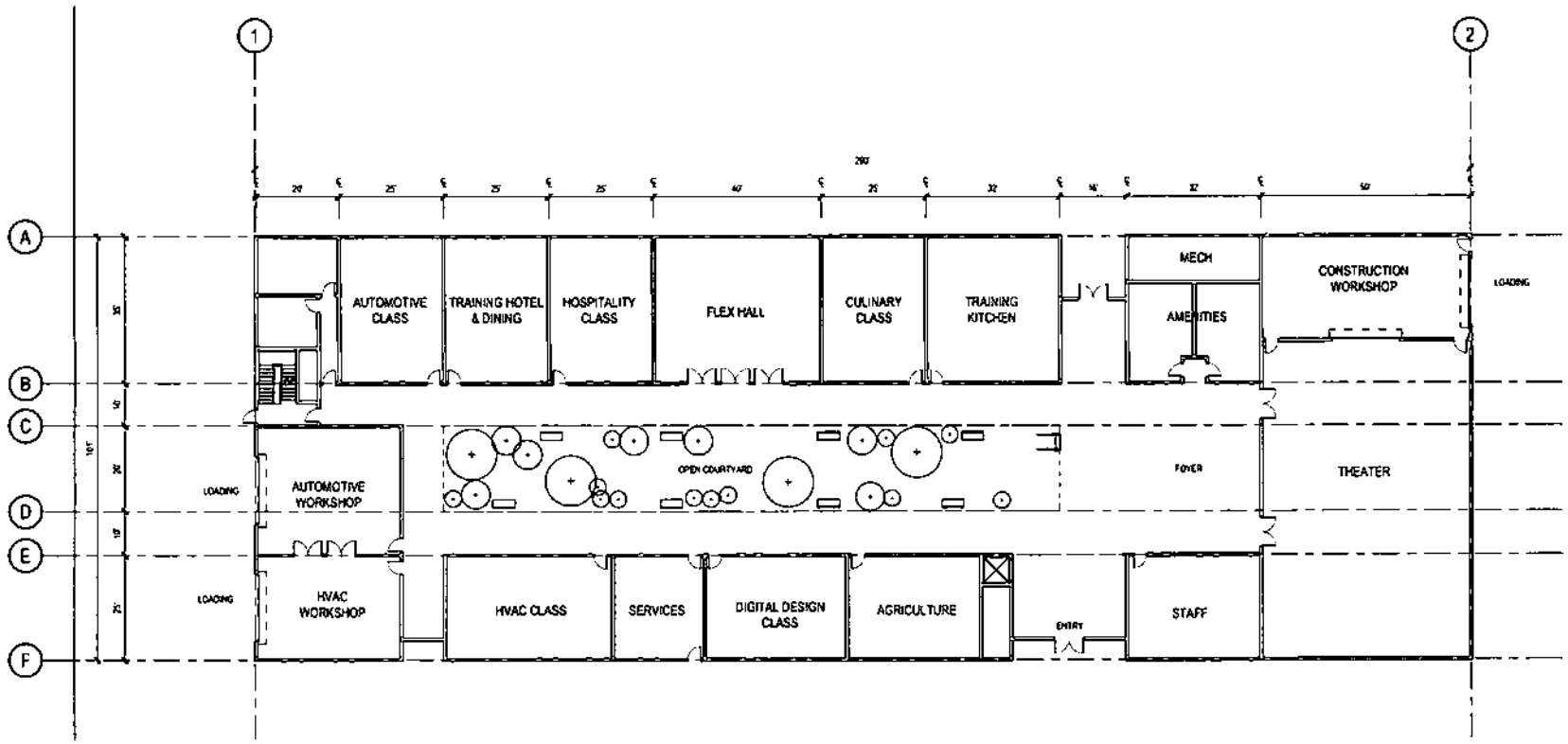
## NEGATIVES

- Less flexibility in retaining cross ventilation or expansion spaces

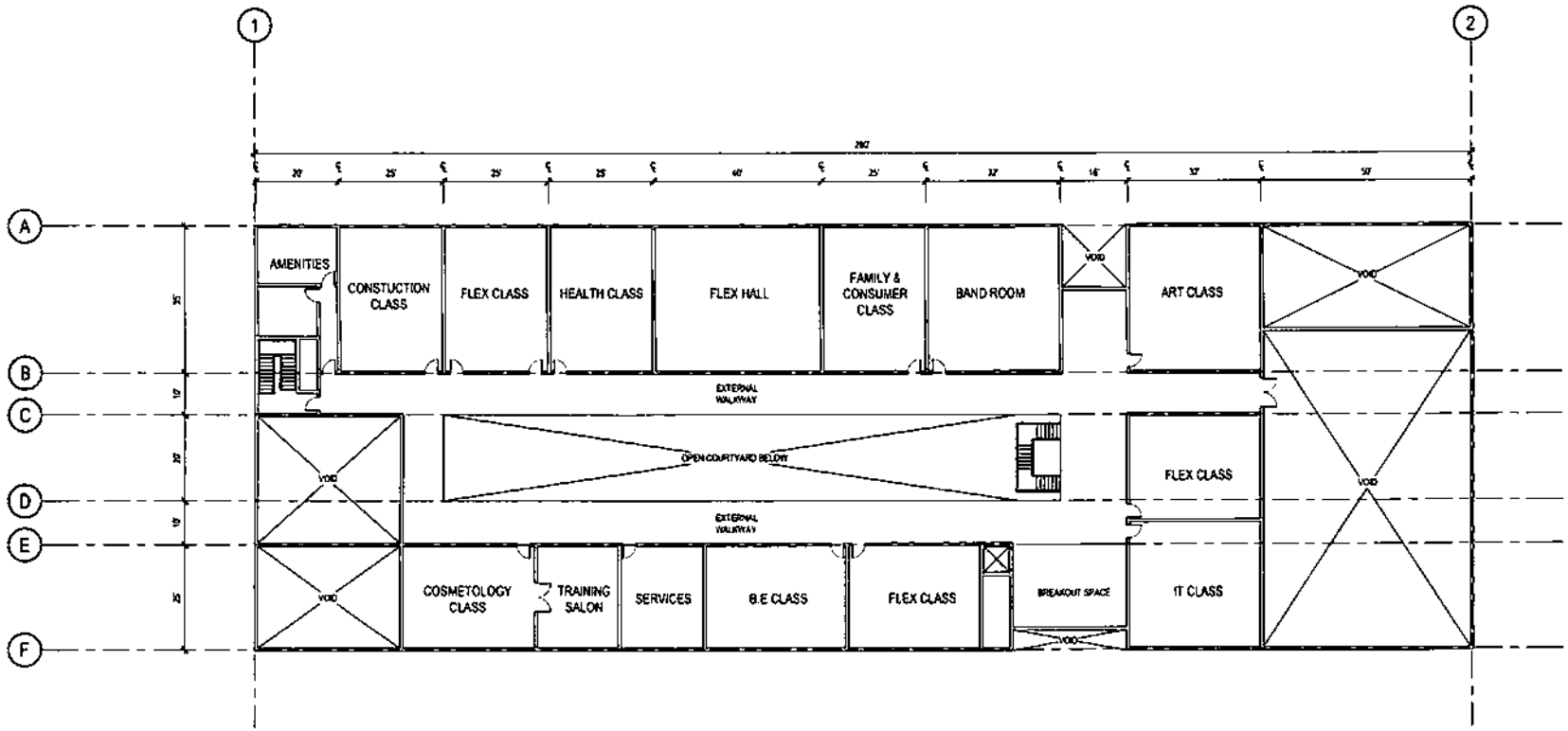
- One long courtyard will have to be programmed to give users distinct and comfortable places to linger and relax.



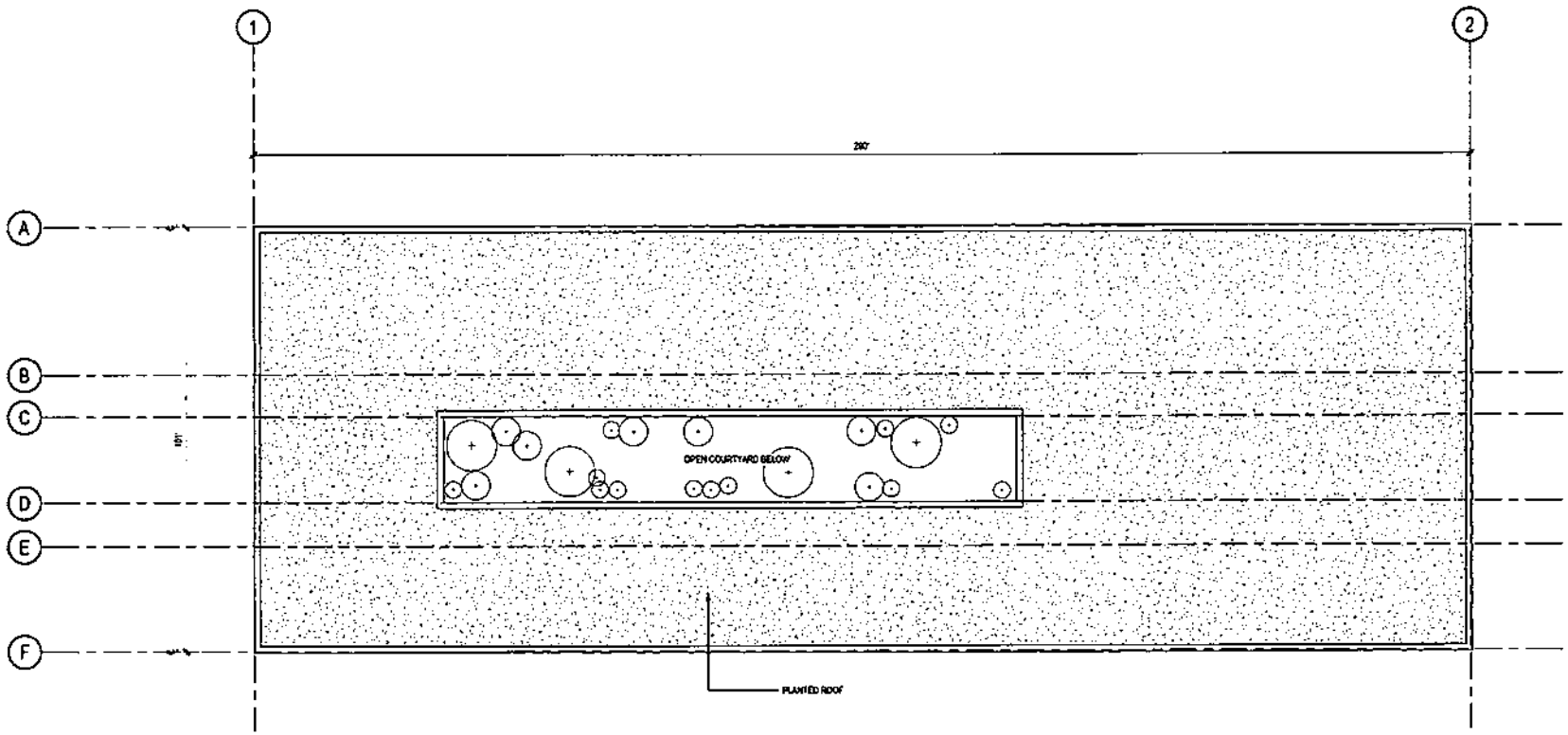

## OPTION 5 - MASSING DIAGRAM

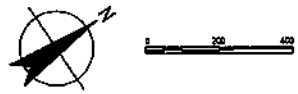



# OPTION 5 - FIRST FLOOR PLAN




## OPTION 5 - SECOND FLOOR PLAN




## OPTION 5 - ROOF PLAN