

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

PUBLIC NOTICE

This Notice is paid by NMHC with HUD funds

02/23/2022

Final Notice and Public Review of a Proposed Activity in a 100-Year Floodplain

This is to give notice that **Northern Marianas Housing Corporation (NMHC)** as determined that the following proposed **Beach Road Improvement Phase III & IV project** under the **Community Development Block Grant – Disaster Recovery (CDBG-DR) program grant number B-19-DV-69-0001 and B-19-DV-69-002** is located in the **100-year floodplain**. NMHC has identified and evaluated practicable alternatives to the proposed action in the **floodplain** and the potential impacts on the **floodplain** from the proposed action, as required by **Executive Order 11988**, in accordance with HUD regulations at 24 CFR 55.20 Subpart C Procedures for Making Determinations on Floodplain Management and Protection of Wetlands. The proposed project(s) is located **on Route 33, Beach Road, Saipan, Commonwealth of the Northern Mariana Islands**

The public may view the full description of the project and provide comments by visiting the NMHC website at www.nmhc.gov.net by clicking on the public notice/announcement tab and selecting the Environmental Review Records or you may visit the NMHC CDBG-DR website at <https://www.cnmicdbgdr.com>.

Written comments must be received by NMHC on or before March 14, 2022. A minimum 15 calendar day comment period will begin the day after the publication and end on the 16th day after the publication. Written comments may also be submitted through the following methods: email at nmhc@nmhc.gov.mp ; or facsimile to 1-670-234-9021; or hand deliver to the NMHC Central Office located in Garapan, Saipan. Attention CDBG-DR Project Division.

/s/

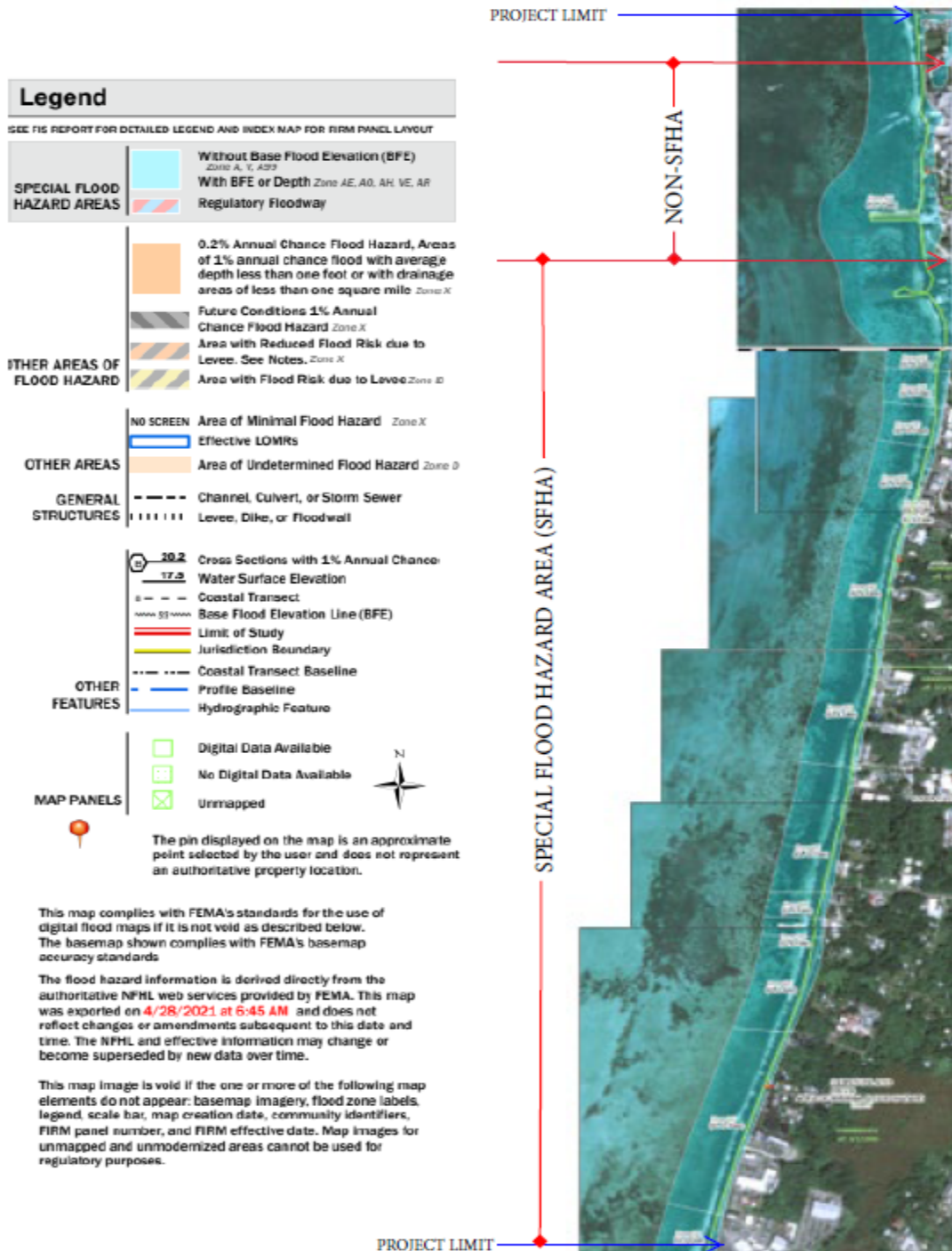
Ralph DLG. Torres
Governor, CNMI

NMHC/CDBG-DR 8-Step decision Making Process for Projects in the Floodplain

Project Name: Beach Road Improvement

1. Determine whether the action is located in a 100-year floodplain (or a 500-year floodplain for critical actions).

This is not a critical facility/structure. Sections of the proposed project is in a 100-year flood zone (Special Flood Hazard Area – SFHA). The flood zone designation is VE (Coastal areas associated with storm waves) with a Base Flood Elevation (BFE) of 10 ft. See map below.

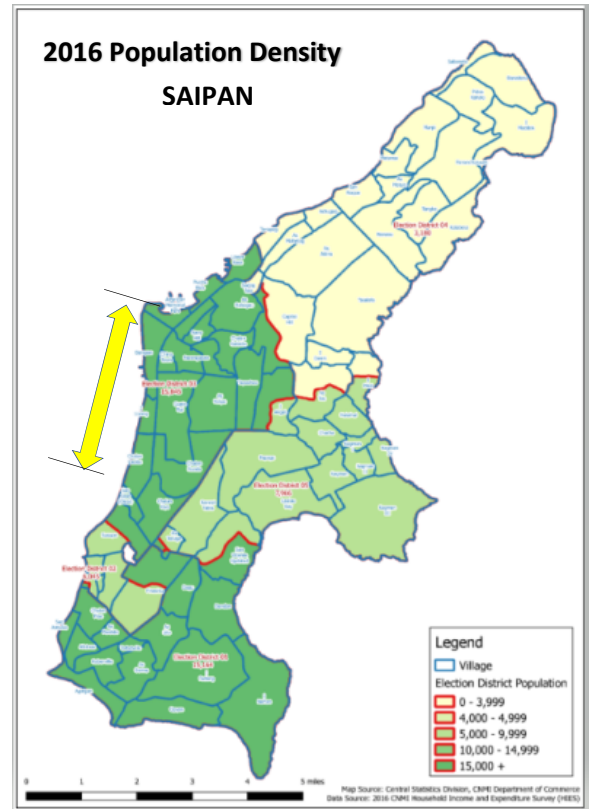


2. Notify the public for early review of the proposal and involve the affected and interested public in the decision-making process.

Early notice was published in the NMHC website and public reviews ad was made in the newspaper thrice between January 6 and 17, 2022 and ended on January 25, 2022. There were no comments or reviews received.

3. Identify and evaluate practicable alternatives. Identify the project site selection criteria and consider several alternative sites and actions:

Beach Road (Route 33) stretches along the coastal west side of the island of Saipan between the village of San Antonio and the commercial tourist district of Garapan. It serves some of the most densely populated areas in the island. Its service has spanned longer than any other major roadways in the island. Built by the Japanese and used during the final year of WWII by the US Military, it was a vital logistical infrastructure, connecting the Isley Military Airfield in the south and US Navy Tanapag Harbor in the north after the war. Over the years, Beach Road has become a vital thoroughfare connecting the island communities. Its crucial importance continues as it enhances social and economic growth of the community by providing stable regularities in social life and interactions in the areas of employment, access to goods and services, transport and access to the beach and other water related activities.



Relocating the road will have adverse and costly social and economic consequences. As seen on the map, hundreds of families will lose access and the ability to work, go to school, and avail social services. Utility and communication services to homes and businesses will deteriorate due to lack of access for repairs. Degeneration of emergency and public safety responses will continue. Businesses will cease due to substantial reduction and costly complications to transport and trade. One needs no cost-benefit analysis to see that relocating the road will result in an immediate and extreme social and economic consequence on the residents and businesses along this road. Because of the island’s small size, the trickle-down effect and iterative proliferation nature of this hardship will be universal and immediate as well. Finally, road relocation will directly and indirectly force thousands of people and businesses to uproot from their lands and properties and relocate elsewhere. The mitigation cost will easily be in the hundreds of millions of dollars.

A. Locate the project within the floodplain

The project limit begins at Lat. 15.170823°N, long. 145.710655°E and ends at 15.214939°N, Long. 145.720624°. It is located on the island of Saipan. See map on the previous page.

B. Consider modifying the project

One practical option is to elevate the road with compacted fill. However, the National Flood Insurance Program prohibits any structural fill in VE and coastal A zones.

C. Obtain a Letter of Map Amendment (LOMA) or Letter of Map Revision (LOMR) – DPW will conduct an elevation survey and compare the data to the current base flood elevations. The results will determine whether or not a LOMA or LOMR is applicable.

4. Identify Potential Direct and Indirect Impacts of Associated with Floodplain Development.

All road construction involves earthmoving that may result in changes to elevation and landscape. This project ensures that no alterations will be done to reduce flood storage capacity that may create water displacement, resulting in flooding elsewhere. The project site however, is in a coastal VE zone and potential flooding would be from eastward storm-induced velocity wave action. Because this road is perpendicular to wave action (transverse encroachment), it does not pose significant impact to the floodplain. This road also acts as a barrier between homes and people on the east side. Adverse impacts on natural and beneficial floodplain values are minimal. In fact, it may be beneficial in that it diverts runoff to existing discharge outfalls, thus reducing uncontrolled contamination to the lagoon ecosystem and provides safe access to outdoor recreation. Finally, as this road is in a special flood hazard area, there is still that one percent change of inundation that will equal or greater than the 10-foot base flood elevation. Fortunately, the road has an average elevation of about 9 feet with a lowest and highest points at 6 and 12 feet respectively.

5. Where practicable, design or modify the proposed action to minimize the potential adverse impacts to lives, property, and natural values within the floodplain and to restore, and preserve the values of the floodplain.

Sixty percent of the proposed project is in flood zone VE. About thirty percent is in zone AE and the rest is non-SFHA. The National Flood Insurance Program (NFIP) provides no requirements on road construction; only on building structures and appurtenances. For example, 44 CFR 60.3(e)(4) provides for new construction and substantial improvements for building structures. Additionally, NFIP 60.3(e)(6) prohibits any structural fill in V zones. These requirements are more stringent than those in other flood zones. Furthermore, NFIP prohibits any structural fill in a VE or coastal A zones.

Like many roads with similar design composition, the level of drivability and road safety is dictated by road conditions. Current conditions of pocket-settlement and upheavals, rutting and cracking, potholes and patch failures have forced motorists to drive into bike/pedestrian lanes to avoid these hazards.

The project proposes to resurface the existing road to correct these issues. With this improvement, road hazards are greatly reduced. Road profile will also be improved, thus improving drainage while minimizing physical alterations within the floodplain.

6. Re-evaluate the Alternatives.

See items 3b, 7 and 8 in this report.

With no clear but restrictive NFIP requirements for road construction, the road can still be floodproofed as follows but will cost significantly more and with no comparatively real and substantial effects to preserve values of the floodplain, in fact it may have adverse impact:

Road Elevation: Elevating a 3-mile road, 2 feet above BFE will remove the one percent chance of flooding but would be non-compliant with the no-fill NFIP requirements. This elevated “barrier” will essentially prevent runoff to naturally drain to the ocean. This will trap water east side of the road where homes and businesses are located. It also means that all connecting roads will have to be re-profiled and drainage systems re-configured.

Wet Floodproofing: Constructing a sea side structural wall to reduce the impact of storm waves will satisfy NFIP requirements. However, permanent openings must be in place for people, vehicles and sea crafts to access the beach and water which defeats the purpose of wet-floodproofing. Wet floodproofing is impractical for this project.

As mentioned before, the National Flood Insurance Program prohibits any structural fill in a VE or coastal A zone. However, we must ensure that this project does not contribute adversely to future flooding. In fact, the resurfacing and repairs that this project proposes will, as aforementioned, enhance the natural values and contributes to the restoration and preservation of the floodplain.

7. Determination of No Practicable Alternative

Having considered possible alternatives described in item 6, the Department of Public Works has determined that the best option is the proposed scope of work which is to remove the existing asphalt surface, regrade the existing structural base and repave anew.

8. Implement the Proposed Action

The scope of work of the proposed action is to conform to the original proposal which is to regrade and resurface. Furthermore, repairs of existing surface drainage appurtenances such as curb/gutter and swales will streamline the flow and migration of runoff properly. These components, working in tandem, will improve road safety and enhance floodplain development by ensuring that no potential standing water is retained and that the rate of runoff discharge to seawater is minimized and dispersed. This proposed action is also NFIP compliant.

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

PUBLIC NOTICE

This Notice is paid by NMHC with HUD funds

01/06/2022

Early Notice and Public Review of a Proposed Activity in a 100-Year Floodplain

This is to give notice that **Northern Marianas Housing Corporation (NMHC)** as determined that the following proposed **Beach Road Improvement Phase III & IV project** under the **Community Development Block Grant – Disaster Recovery (CDBG-DR) program grant number B-19-DV-69-0001 and B-19-DV-69-002** is located in the **100-year floodplain**. NMHC will be identifying and evaluating practicable alternatives to locating the action in the **floodplain** and the potential impacts on the **floodplain** from the proposed action, as required by **Executive Order 11988**, in accordance with HUD regulations at 24 CFR 55.20 Subpart C Procedures for Making Determinations on Floodplain Management and Protection of Wetlands. The proposed project(s) is located **on Route 33, Beach Road, Saipan, Commonwealth of the Northern Mariana Islands**

The public may view the full description of the project and provide comments by visiting the NMHC website at www.nmhc.gov.net by clicking on the public notice/announcement tab and selecting the Environmental Review Records or you may visit the NMHC CDBG-DR website at <https://www.cnmicdbgdr.com>.

Written comments must be received by NMHC on or before January 24, 2022. A minimum 15 calendar day comment period will begin the day after the publication and end on the 16th day after the publication. Written comments may also be submitted through the following methods: email at nmhc@nmhc.gov.mp ; or facsimile to 1-670-234-9021; or hand deliver to the NMHC Central Office located in Garapan, Saipan. Attention CDBG-DR Project Division.

/s/

Ralph DLG. Torres
Governor, CNMI

COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS
NORTHERN MARIANAS HOUSING CORPORATION

Early Notice and Public Review of a Proposed
Activity in a 100-Year Floodplain
01/06/2022

To: All interested State and Federal Agencies, Groups and Individuals.

This is to give notice that **Northern Marianas Housing Corporation (NMHC)** as determined that the following proposed **Beach Road Improvement Phase III & IV project** under the **Community Development Block Grant – Disaster Recovery (CDBG-DR) program grant number B-19-DV-69-0001 and B-19-DV-69-002** is located in the **100-year floodplain**. NMHC will be identifying and evaluating practicable alternatives to locating the action in the **floodplain** and the potential impacts on the **floodplain** from the proposed action, as required by **Executive Order 11988**, in accordance with HUD regulations at 24 CFR 55.20 Subpart C Procedures for Making Determinations on Floodplain Management and Protection of Wetlands. The proposed project(s) is located **on Route 33, Beach Road, Saipan, Commonwealth of the Northern Mariana Islands**

Project Activity Description: Beach road is one of three main arterial roadways connecting north and south of the island. It is also the main road connecting Garapan, a busy tourist and business area to the southern and central parts of Saipan. During the recovery phases of the two previous super typhoons, Soudelor and Yutu, tons of supplies, equipment, personnel and other resources arrived on island by air. Beach road was the main access road connecting the airport and was primarily used to move these resources. The project limit begins just south of Route 31-Beach Rd intersection, Lat. 15.170823°N, long. 145.710655°E and terminates at Beach Rd-Micro Beach Rd intersection, 15.214939°N, Long. 145.720624°. It is located on the island of Saipan.

The scope of work of the proposed action is to conform to the original proposal which is to regrade and resurface. There will be no change in roadway elevation profile between the existing and the proposed. Any backfilling activities will only be replacing existing base course that is structurally deficient. Furthermore, there will be no new drainage structures; only repairs of existing surface drainage appurtenances such as curb/gutter, swales, etc. which will further improve the flow and migration of runoff. These components, working in tandem, will improve road safety and enhance floodplain development by ensuring that no potential standing water is retained and that the rate of runoff discharge to seawater is evenly dispersed. This proposed action is also NFIP compliant.

Purpose: Beach Road serves thousands of island residents who reside and work in the area, using the road to access goods and services. Weather, storms, compounded with age, salination effects and traffic fatigue have contributed to the accelerated deterioration of Beach Road. There are numerous settlements along the road which allow water to puddle in the roadway. Rutting and road cracks continue to extend and expand, allowing water to penetrate and destabilize the supporting base course. Like many roads with similar design composition, the level of drivability and road safety is dictated by road conditions. Current conditions of pocket-settlement and upheavals, rutting and cracking, potholes and patch failures have forced motorists to drive into bike/pedestrian lanes to avoid these hazards.

The mitigation proposes to resurface the existing road and remedy these issues. With this improvement, road hazards are greatly reduced. Road profile will also be improved, thus improving drainage while minimizing physical alterations within the floodplain.

Description: Beach Rd Phase III-IV is approximately 1700 ft in length with an average width of 45 feet. Eighty-seven percent (1.5 acre or 1480 feet) of the proposed project is in a Special Flood Hazard Area; sixty-seven percent is in a VE zone, twenty percent is AE/AO zones and the remaining thirteen percent is non-SFHA. The National Flood Insurance Program (NFIP) provides no requirements on road construction; only on building structures and appurtenances. However, NFIP 60.3(e)(6) states that the community shall "Prohibit the use of fill for structural support of buildings within Zones V1-30, VE and V on the community's FIRM". Clearly, this only applies to buildings (not roads) due to probable structural and catastrophic failure due to erosion.

Natural and Beneficial Functions: All road construction involves earthmoving that may result in changes to elevation and landscape. This project ensures that no alterations will be done to reduce flood storage capacity that may create water displacement, resulting in flooding elsewhere. The project site however, is in a coastal VE zone and potential flooding would be from eastward storm-induced velocity wave action. Because this road is perpendicular to wave action (transverse encroachment) and without backwater, it does not pose significant impact to the floodplain. This road also acts as a barrier between homes and people on the east side. Adverse impacts on natural and beneficial floodplain values are minimal. In fact, it may be beneficial in that it diverts runoff to existing discharge outfalls, thus reducing uncontrolled contamination to the lagoon ecosystem and provides safe access to outdoor recreation.

Finally, as this road is in a special flood hazard area, 1.528 acres is the part of the project limits that is in a Special Flood Hazard Area. There is still that one percent change of inundation that will equal or exceed the 10-foot base flood elevation. Fortunately, the road has an average elevation of about 9 feet with a lowest and highest points at 6 and 12 feet respectively. Note that existing road elevations in VE zones are between 10 and 12 feet, greater than associated BFE's. Currently, the existing drainage system is not functioning as intended because it's old and deteriorated. The proposed road and drainage mitigation will bring these structures to work in tandem. One of the environmental benefits to the ecosystem is the evenly balanced dispersion of runoff to the ocean and the surrounding areas.

There are three primary purposes for this notice. First, people who may be affected by activities in **floodplains** and those who have an interest in the protection of the natural environment should be given an opportunity to express their concerns and provide information about these areas. Commenters are encouraged to offer alternative sites outside of the **floodplain**, alternative methods to serve the same project purpose, and methods to minimize and mitigate impacts. Second, an adequate public notice program can be an important public educational tool. The dissemination of information and request for public comment about **floodplains** can facilitate and enhance Federal efforts to reduce the risks and impacts associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the Federal government determines it will participate in actions taking place in **floodplains**, it must inform those who may be put at greater or continued risk.

The public may view the full description of the project and provide comments by visiting the NMHC website at www.nmhc.gov.net by clicking on the public notice/announcement tab and selecting the Environmental Review Records or you may visit the NMHC CDBG-DR website at <https://www.cnmicdbqdr.com>.

Written comments must be received by NMHC on or before **January 24, 2022**. A minimum 15 calendar day comment period will begin the day after the publication and end on the 16th day after the publication., Written comments may also be submitted through the following methods: email at nmhc@nmhc.gov.mp ; or facsimile to 1-670-234-9021; or hand deliver to the NMHC Central Office located in Garapan, Saipan. Attention CDBG-DR Project Division.