

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

PUBLIC NOTICE

This Notice is paid by the NMHC with HUD funds.

**NOTICE OF FINDING OF NO SIGNIFICANT IMPACT AND
NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS
09/19/23**

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

These notices shall satisfy the above-cited two separate but related procedural notification requirements.

REQUEST FOR RELEASE OF FUNDS

On or after October 05, 2023, 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	Purpose	Location	Total Project Cost
CNMI Homeland Security & Emergency Management (HSEM) 200-foot new replacement tower project.	Replacement of tower	Mt. Tapochau, Saipan	Approximately \$1,883,100.00 of CDBG-DR funds; no other funds are to be used.

FINDING OF NO SIGNIFICANT IMPACT

The Government of the Commonwealth of the Northern Mariana Islands has determined that the above-listed project 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) on the Northern Marianas Housing Corporation (NMHC) website at www.nmhcgov.net or NMHC Community Development Block Grant - Disaster Recovery (CDBG-DR) website at www.cnmi-cdbgdr.com; or on file at the NMHC Central Office in Garapan, Saipan or NMHC CDBG-DR Office in Beach Road, Chalan Lulau, Saipan, examined 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 may submit written comments on the ERR to Northern Marianas Housing Corporation. You may submit comments to 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 officemanager@nmhcgov.net. All comments received by **October 04, 2023, 4:30 p.m.** will be considered by the Government of the Commonwealth of the Northern Mariana Islands prior to authorizing the submission of a request for release of funds. Comments should specify which Notice they are addressing.

ENVIRONMENTAL CERTIFICATION

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 Arnold I. Palacios 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. approval of the certification satisfies its responsibilities under the National Environmental Policy Act (NEPA) of 1969 and related laws and authorities, and allows the Government of the Northern Mariana Islands to use Program Funds.

OBJECTIONS TO RELEASE OF FUNDS

The U. S. Department of Housing and Urban Development (HUD) Washington D.C will accept objections to its release of fund and the Government of the Northern Mariana Islands certification for a period of **fifteen days** following the anticipated submission date or its actual receipt of the request (whichever is later) only if they are 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 HUD regulations at 24 CFR part 58; (c) the grant recipient or other participants in the development process have committed funds, incurred costs or undertaken activities not authorized by 24 CFR Part 58 before approval of a release of funds by U. S. Department of Housing and Urban Development (HUD); 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 (24 CFR Part 58, Sec. 58.76) and shall be addressed to Ms. Tennille Smith Parker, DRSI Division Director, HUD, via email at Tennille.S.Parker@hud.gov or via telephone (202)402-4649. Potential objectors should contact e U.S. Department of Housing and Urban Development to verify the actual last day of the objection period.

/s/

Arnold I. Palacios
Governor of the 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: CNMI Homeland Security & Emergency Management 200-foot New Replacement Tower Project

Responsible Entity: Northern Marianas Housing Corporation (NMHC)

Grant Recipient (if different than Responsible Entity):

State/Local Identifier: 854856277

Preparer: Wilfred Villagomez, Project Supervisor

Certifying Officer Name and Title: Arnold I. Palacios, Governor

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: Mt. Tapochau, Saipan, MP 96950

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

The CNMI Homeland Security and Emergency Management (HSEM) proposes to replace the existing Communications Tower to a new Communications Tower. The current tower was intended as a rehabilitation repair project but was later determined to be deteriorated and structurally compromised due to current elements and previous storms. It was also determined that the structure was not up to the current building code. The tower is the lifeline of telecommunications for the entire CNMI. The tower has incurred structural damage from previous typhoons but more so with Typhoon Yutu. An assessment to the tower was done after the typhoon and damages to the ladder, steel structure and exposure of various sections ranging from 50 feet to 200 feet. It was also determined that 75%

of the tower sustained moderate damage due to its exposure to strong winds and heavy rainfall. The lower 50 feet of the tower sustained minimal damage as its current position is protected by the carved portion of Mt. Tapochau.

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

The Communications Center Tower is the main focal point of reception and transmission in the CNMI. The potential loss of the Communications Center Tower would result in no communications or ability to support antennas for the telecommunications and broadcasting within and throughout the CNMI as its utilized by the government and civilian population as the main transmission points of the islands. The need for this new replacement tower affects government, public and private communications and especially for emergency communications. The damages sustained from Typhoon Yutu have left the tower vulnerable to continued wind and rain damage. This in turn exposes sections of the tower to corrosion and deterioration throughout the structure. The project will ensure a continuous communication operations and resiliency of a stable communications tower for the CNMI.

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

The CNMI is reliant on the continuous communications access with the HSEM Communications Tower with public and private users on a daily basis. The communications tower has reached a deterioration in structural quality, safety and shelf life on portions that have degraded due to weather elements. There is an urgent need to replace the old communications tower to a new communications tower and continue the services for CNMI telecommunications and broadcasting before the next major typhoon.

Funding Information

Grant Number	HUD Program	Funding Amount
B-19-DV-69-001/002		\$ 1,883,100.00

Estimated Total HUD Funded Amount: \$ 1,883,100.00

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

\$ 1,883,100.00

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 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The CNMI Commonwealth Ports Authority has determined the project site is free from the runway clear zones. See Appendix A on Letter dated November 21, 2022 and Map of Location and Airport Hazards (CEST and EA) Worksheet
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	This regulation does not apply to the project area; therefore, the project is in compliance. See Appendix B on Letter dated November 29, 2022, Map of Location and Coastal Barrier Resources (CEST and EA) Worksheet. *Contactors shall apply the necessary permits prior to any construction work. *
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project does not require and cannot obtain flood insurance for infrastructure project. There are no Flood Insurance for Public Infrastructures. See Appendix C on Letter dated December 06, 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 Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The CNMI Bureau of Environmental and Coastal Quality (BECQ) does not believe that the project will have a significant impact on the environment as defined by the National Environmental Policy Act. See Appendix D on Letter dated November 17, 2022 and Air Quality (CEST and EA) Worksheet.

		*Prior to construction the contractor is required to obtain permits from BECQ. *
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The CNMI Division of Coastal Resources Management (DCRM) has determined that the proposed project does not anticipate that it will cause adverse impact to coastal resources. See Appendix B on Letter dated November 29, 2022, Map of Location and Coastal Zone Management Act (CEST and EA) Worksheet. *Contractors shall obtain the necessary permits prior to any construction activities*
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The CNMI Bureau of Environmental and Coastal Quality (BECQ) does not believe that the project will have a significant impact on the environment as defined by the National Environmental Policy Act. See Appendix D on Letter dated November 17, 2022, Contamination and Toxic Substances (Multifamily and Non-Residential Properties) Worksheet.
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The CNMI Division of Fish and Wildlife (DFW) has determined that they do not anticipate impacts to T&E species. See Appendix E on Letter Dated September 01, 2023 and Endangered Species Act (CEST and EA) Worksheet.
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The CNMI Bureau of Environmental and Coastal Quality (BECQ) has determined that the project does not involve new development for habitation; OR it involves new development for habitation but is not located within one mile of a NPL (“Superfund”) site, within ½ mile of a CERCLIS site, no adjacent to any other known or suspected site contaminated with toxic chemicals or radioactive source determines it does not pose a hazard. See Appendix D on Letter Dated November 17, 2022 and Explosive and Flammable Hazards (CEST and EA) Worksheet.

<p>Farmlands Protection</p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Natural Resources Conservation Service (NCRS) has determined that NO protected farmlands will be impacted.</p> <p>See Appendix F on AD-1006, Map of Location and Farmlands Protection (CEST and EA) Worksheet.</p>
<p>Floodplain Management</p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The CNMI Department of Public Works has determined that the project is not located in the special flood hazard area.</p> <p>See Appendix C on Letter Dated December 06, 2022 and Map of Location from FEMA's National Flood Hazard Layer and Floodplain Management (CEST and EA) Worksheet.</p>
<p>Historic Preservation</p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>There is some ground disturbance activities for this project, this project will use the same footprint on new base activities. The CNMI Historic Preservation Office (HPO) concurs that the project will have "no adverse effect" on historic properties.</p> <p>See Appendix I on Letter Dated July 21, 2022 and Historic Preservation (CEST and EA) Worksheet.</p>
<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>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.</p> <p>See Appendix D on Letter dated November 17, 2022 and Noise (EA Level Reviews) Worksheet.</p> <p>*Contractors shall obtain the necessary permits prior to any construction activities*</p>
<p>Sole Source Aquifers</p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The CNMI has no Sole Source Aquifers.</p> <p>See Appendix G on Map for Sole Source Aquifers and Sole Source Aquifers (CEST and EA) Worksheet.</p>
<p>Wetlands Protection</p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project is not located in a wetland. The CNMI Coastal Resources Management (CRM) had determined that the project site does not involve new construction within or</p>

		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. See Appendix D on Letter dated November 17, 2022 and Wetland Map from National US Fish & Wildlife Service Wetlands Inventory and Wetlands (CEST and EA) Worksheet.
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	There are no wild or scenic rivers located in the CNMI. See Appendix H on Map of Location from National Rivers Inventory.
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	NMHC has determined that there will be no adverse environmental impact that could have a potential to have disproportionate impact on low income or minority individuals for this project. See Appendix J on Environmental Justice (ECST and EA) Worksheet.

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.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	The soil suitability of the proposed project is suitable for the project. The project has an existing tower that will be removed and replaced on its current footprint area. The current tower is within a concrete wall enclosed area that will prevent erosion during construction.
Hazards and Nuisances including Site Safety and Noise	2	The proposed project will require hazard prevention on marked locations of the project, including site safety requirements and noise limitations. Contractors obtaining permit must adhere to the permitting requirements such as construction safety and noise.
Energy Consumption	2	The construction activity will utilize existing power source from public utilities. It may require little to no use of energy besides equipment that requires the use of fossil fuels and electric generator if needed.

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	3	There is no adverse impact on commercial facilities. The project will impact communications both public and private but it is being addressed to minimize any cause of delays by installing temporary alternative communications during the project activity.

Health Care and Social Services	2	There is no adverse impact on Health Care and Soil 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 sand Sanitary Sewer facilities.
Water Supply	2	There is no adverse impact on Water Supply facilities.
Public Safety - Police, Fire and Emergency Medical	3	There is no adverse impact on Public Safety Services. The project will impact communications both public and private but it is being but it is being addressed to minimize any cause of delays by installing temporary alternative communications during the project activity.
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. The project is within an enclosed concrete wall section area.
Other Factors	2	State laws and regulations requires all construction activities to go through a permit process.

Additional Studies Performed:

A&E new design assessment

Field Inspection (Date and completed by):

July 06, 2023 by Wilfred Villagomez

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

1. CNMI Commonwealth Ports Authority (CPA)
2. CNMI Coastal Resource Management (CRM)
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 and Preservation Office (HPO)
7. U.S. Natural Resources Conservation Service (NCRS)
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 notice to the local newspaper outlets, NMHC website and social media outlet to review the completed environmental review and allow the public to 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 require 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]

The alternative for this project is to relocate to a new area and build a new tower. The Department of Homeland Security and Emergency Services at this current status will not be able to afford to build and relocate to a new Communications Center Tower, too costly. The project location is limited to current communications tower by private and federal tower areas.

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

The NMHC considers a no action alternative is possible to funding issues and the stability of the structure is reaching its maximum use before a strong typhoon breaks the whole tower down. The structural integrity of the tower has reached its limits.

Summary of Findings and Conclusions:

There are no environmental impacts for this project and therefore it shall proceed.

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.

None.

Law, Authority, or Factor	Mitigation Measure

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: Wilfred Villagomez Date: 9/11/23

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

Reviewer Signature: [Signature] Date: 9/13/2023

Reviewed by: Jesse S. Palacios, Corporate Director

Certifying Officer Signature: [Signature] Date: 9/13/23

Name/Title: Arnold I. Palacios, Governor, CNMI

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).

APPENDIX A

Airport Hazards



COMMONWEALTH PORTS AUTHORITY

Main Office: FRANCISCO C. ADA/SAIPAN INTERNATIONAL AIRPORT
P.O. Box 501055, Saipan, MP 96950-1055
Phone: (670) 237-6500/1 Fax: (670) 234-5962
E-mail Address: cpa.admin@pticom.com
Website: www.cpa.gov.mp



November 21, 2022

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

Dear Mr. Arriola:

Subject: Request for Determination of Effect
HSEM Communications Center New Replacement Tower
Mt. Tapochau, Saipan

This is in reference to your letter dated November 17, 2022 requesting for a determination of effect for the above subject project. The project is for the new construction of a communications tower at Mt. Tapochau, Saipan under the Community Development Block Grant – Disaster Recovery Program.

After review of the lot and its location, we determined that it is free from the Airport Runway Clear Zones. As such, the determination of effect is hereby given.

Should you have questions, please feel free to contact us.

Sincerely,


CHRISTOPHER S. TENORIO
Executive Director

cc: file



NMHC- CDBG-DR
RECEIVED

By: *KUSA*
Date: *12/9/22*
Time: *7:50*





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Measure distance

Total distance: 4.58 mi (7.38 km)

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:

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.

→ *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

The project is in Mt. Tapochau, Saipan. The CNMI Commonwealth Ports Authority has reviewed the project area and determined to be free from Airport Clear Zones. The Google Map of distance from HSEM 200-foot New Communications Center Tower project at Mt. Tapochau to Saipan International Airport.

Are formal compliance steps or mitigation required?

Yes

No

APPENDIX B

**Coastal Barrier Resources
Coastal Zone Management**



Eli D. Cabrera
Administrator

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



Richard V. Salas
Director, DCRM

November 29, 2022

Ref No: PRM23-010/307-23-004

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

RE: Determination of Effect, HSEM New Replacement Communications Center Tower

Dear Mr. Arriola,

The Division of Coastal Resources Management (DCRM) is in receipt of your letter dated November 17, 2022 requesting for DCRM's determination on the above-subject projects on Mt. Tapochao, Saipan. As stated in your letter, the Northern Marianas Housing Corporation (NMHC) is in the process of preparing the Environmental Assessment Statutory Checklist for Homeland Security and Emergency Management Office's (HSEM) new replacement of the 200-foot communications tower since the existing tower was not in compliance with the new building codes. Moreover, the project will be within the same footprint and will be reconstructed to accommodate a new and resilient structure.

Based on the information provided, DCRM hereby maintains its original determination that the proposed actions are not likely to cause significant adverse impact to coastal resources. Furthermore, the project is wholly situated outside of DCRM's designated Area of Particular Concern (APC) nor does the project meet DCRM's definition of a Major Siting development pursuant to NMIAC § 15-10-020(uu) of the CRM Rules and Regulations. To the extent that these new projects will require issuance of a federal license or permit or trigger 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 likely cause significant public controversy and believes that the public and other agencies will be supportive of this activity. 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's proposal 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 NMHC plans and seeks permits for this important project. Should you have any questions or need assistance, please call our Permitting Section at (670) 664-8300 for assistance.

Sincerely,



For 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

The project is located in Mt. Tapochau, Saipan. The CNMI Coastal Resources Management has determined the HSEM 200-foot New Communications Tower project is not partially or wholly situated within DCRM's designated areas of particular concern (APE).

Are formal compliance steps or mitigation required?

Yes

No

Coastal Zone Management Act (CEST and EA)

General requirements	Legislation	Regulation
Federal assistance to applicant agencies for activities affecting any coastal use or resource is granted only when such activities are consistent with federally approved State Coastal Zone Management Act Plans.	Coastal Zone Management Act (16 USC 1451-1464), particularly section 307(c) and (d) (16 USC 1456(c) and (d))	15 CFR Part 930
References		
https://www.onecpd.info/environmental-review/coastal-zone-management		

Projects located in the following states must complete this form.

Alabama	Florida	Louisiana	Mississippi	Ohio	Texas
Alaska	Georgia	Maine	New Hampshire	Oregon	Virgin Islands
American Samona	Guam	Maryland	New Jersey	Pennsylvania	Virginia
California	Hawaii	Massachusetts	New York	Puerto Rico	Washington
Connecticut	Illinois	Michigan	North Carolina	Rhode Island	Wisconsin
Delaware	Indiana	Minnesota	Northern Mariana Islands	South Carolina	

1. Is the project located in, or does it affect, a Coastal Zone as defined in your state Coastal Management Plan?

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 a map showing that the site is not within a Coastal Zone.

2. Does this project include activities that are subject to state review?

Yes → Continue to Question 3.

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.

3. Has this project been determined to be consistent with the State Coastal Management Program?

Yes, with mitigation. → Continue to Question 4.

Yes, without mitigation. → 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.

No, project must be canceled.

Project cannot proceed at this location.

4. 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 State Coastal Management Program letter of consistency) 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

The project is located in Mt. Tapochau, Saipan. The CNMI Division of Coastal Resources Management Office maintains its original determination that the proposed project is not likely to cause significant adverse impact to coastal resources.

Are formal compliance steps or mitigation required?

Yes

No



U.S. Fish and Wildlife Service

Coastal Barrier Resources System

HSEM 200-foot New Communic



U.S. Fish and Wildlife Service, Coastal Barrier Resources Act Program, Esri, HERE, Garmin, (c) OpenStreetMap contributors, Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community
 Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

This map is for general reference only. The Coastal Barrier Resources System (CBRS) boundaries depicted on this map are representations of the controlling CBRS boundaries, which are shown on the official maps, accessible at <https://www.fws.gov/library/collections/official-coastal-barrier-resources-system-maps>. All CBRS related data should be used in accordance with the layer metadata found on the CBRS Mapper website.

The CBRS Buffer Zone represents the area immediately adjacent to the CBRS boundary where users are advised to contact the Service for an official determination (<https://www.fws.gov/service/coastal-barrier-resources-system-property-documentation>) as to whether the property or project site is located "in" or "out" of the CBRS.

CBRS Units normally extend seaward out to the 20- or 30-foot bathymetric contour (depending on the location of the unit). The true seaward

July 6, 2023

 CBRS Buffer Zone System Unit

CBRS Units

Otherwise Protected Area

APPENDIX C

Flood Insurance

Flood Plain Management



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



December 06, 2022
Serial No. PW22-1178

Mr. Jonathan I Arriola
Project Manager
Northern Marianas Housing Corporation
Saipan, MP 96950

RE: Determination of Special Flood Hazard Area – HSEM New Replacement
Communications Center Tower

Dear Mr. Arriola:

This letter is in response to your request received by our office on November 18, 2022 for the determination of Special Flood Hazard Area as part of a regulatory compliance checklist for the proposed Homeland Security & Emergency Management Office 200-foot New Replacement Tower project located on Lot# 117 E 01, Mt. Tapochau, Saipan.

An earlier determination letter (Serial No. PW22-0180) for the said lot/location was completed and received by your office on February 22, 2022.

Because there is no change to the proposed project location and/or flood zone, an earlier determination letter aforementioned above shall be valid and applicable to the current HSEM 200-ft. New Replacement Tower Project proposal.

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

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

This project is in Mt. Tapochau, Saipan. There is 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. Mitigation

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

The project is in Mt. Tapochau, Saipan. The project is not located in a flood hazard area. See attached map of location.

Are formal compliance steps or mitigation required?

Yes







No

Special Flood Hazard Areas - Saipan

Mt. Tapochau



Legend

-  Location of Lot
- FEMA Flood Zones**
-  A
-  AE
-  AO
-  V
-  VE

500 Feet





BECQ Public Permitting App

Helping you get started on your project

Map navigation controls including zoom in (+), zoom out (-), search (magnifying glass), and several empty square buttons.

Search by Lot ID or Village



Tinian

2mi

145.962 15.154 Degrees

APPENDIX D

Clean Air

**Contaminated and Toxic
Substances**

Explosive and Flammable Hazards

Noise Abatement and Control

Wetlands



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

November 17, 2022

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



Re: Request for a Determination of Effect HSEM New Replacement Communications Center Tower

Dear Mrs. Cruz:

The Northern Marianas Housing Corporation (NMHC) is in the process of preparing the Environmental Assessment Statutory Checklist (24 CFR § 58.35) for the **Homeland Security & Emergency Management Office 200-foot New Replacement Tower Project, Mt. Tapochau, Saipan, MP. Lot# 117 E 01.**

The earlier letter indicated a rehabilitation but there was a problem with the existing tower not in compliance with the new building codes. A new Communications Tower with the same footprint will be reconstructed to accommodate a new and resilient structure from future storms.

An attached copy of the earlier approved submission from your office is provided for your reference.

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 **Replacement activity**, 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:**

"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

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.

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” area, **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.



Tinian Field Office
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Fax: (670)433-3690

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NORTHERN MARIANAS HOUSING CORPORATION
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Website: <http://www.cnmi-cdbgdr.com>

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

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
Project Manager
Northern Marianas Housing Corporation
Enclosures: Map of Location
Scope of Work

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.

12/07/2022

Zabrina Cruz, Director Date
Division of Environmental Quality



Tinian Field Office
Tel: (670)433-9213
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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 environment as defined by the National Environmental Protection 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 concurrence. Be advised of the comments, recommendations and requirements from the DEQ programs below.

Date:

12/07/2022

Request from:

Northern Marianas Housing Corporation

Project Site:

HSEM New Replacement Communications Center Tower

Project Description:

Replacement & Reconstruction

Wastewater, Earthmoving, & Erosion Control	Water Quality/Nonpoint Source	Clean Air Program
<p>A One-Start Earthmoving Permit is NOT REQUIRED for the proposed HSEM New Replacement Communications Center Tower project. WEEC advises that the contractor utilize "Best Management Practices" when the activity commences and until it is completed.</p>	<p>No comments or concerns on this project from WQS/NPS Branch.</p>	<p>Water suppression, tarp coverage, or other best management practices must be implemented to control fugitive dust from construction activities.</p>
Safe Drinking Water	Toxic Waste Management	Solid Waste Management
<p>No comments or concerns from SDW.</p>	<p>Rehabilitation/Reconstruction: 1. All parties relating to the rehabilitation/ reconstruction shall cease activities upon the discovery of any hazardous or unusual substance or object (e.g. ordnance, old drums, oils, chemicals, etc). and shall immediately report the discovery to DEQ's Toxic Waste Management Branch. On weekends, holidays, or afterhours the parties pertaining to the project shall notify Homeland Security and Emergency Management at 670-237-8000. Failure to immediately report such findings may result in enforcement proceedings and penalties. 2. All household hazardous waste and universal waste generated from the rehabilitation/reconstruction shall be disposed of properly and in accordance with applicable state and federal regulations.</p>	<p>Solid waste to be generated must be taken to the Marpi Landfill or DEQ permitted recycling facility.</p>
Storage Tanks	Site Assessment & Remediation	Pesticides
<p>Based on the scope of work; the Storage Tanks Branch has no comments or concerns.</p>	<p>No additional comments from previously submitted SAR review</p>	<p>No comments from Pesticides Program at this time.</p>

**Map
Images**

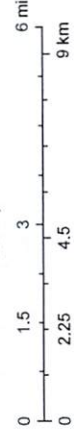
HSEM 200-foot New Communications Tower Project



7/10/2023, 1:11:10 PM

- Coastal Hazards
- Managaha/Anjota
- Shoreline
- Lagoon and Reef
- Port and Industrial
- Wetlands

1:122,300



Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community, Sources: Esri, HERE, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

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 estimated emissions levels of your project for each of those criteria pollutants 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

The project is located in Mt. Tapochau, Saipan. The project is located within an attainment or conforms with EPA-approved State Implementation Plan (SIP) by the CNMI Division of Environmental Quality.

Are formal compliance steps or mitigation required?

Yes

No

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) 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 requirements² 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 controls³, or use of institutional controls⁴.

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

The project is located in Mt. Tapochau, Saipan. The CNMI Division of Environmental Quality has determined that the project does not involve new development for habilitation; OR the project involves new development for habilitation, 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.

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

The project is located in Mt. Tapochau, Saipan. The HSEM New Communications Center Tower Project will not affect or incur any explosive and flammable facilities.

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 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 area¹?

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

The project is located in Mt. Tapochau, Saipan. The HSEM New Communications Center Tower Project is a replacement of a metal structure. It will require heavy equipment during the daytime but not too much noise impact since there is no house dwelling nearby the project.

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

The project is located in Mt. Tapochau, Saipan. The HSEM New Communications Center Tower 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

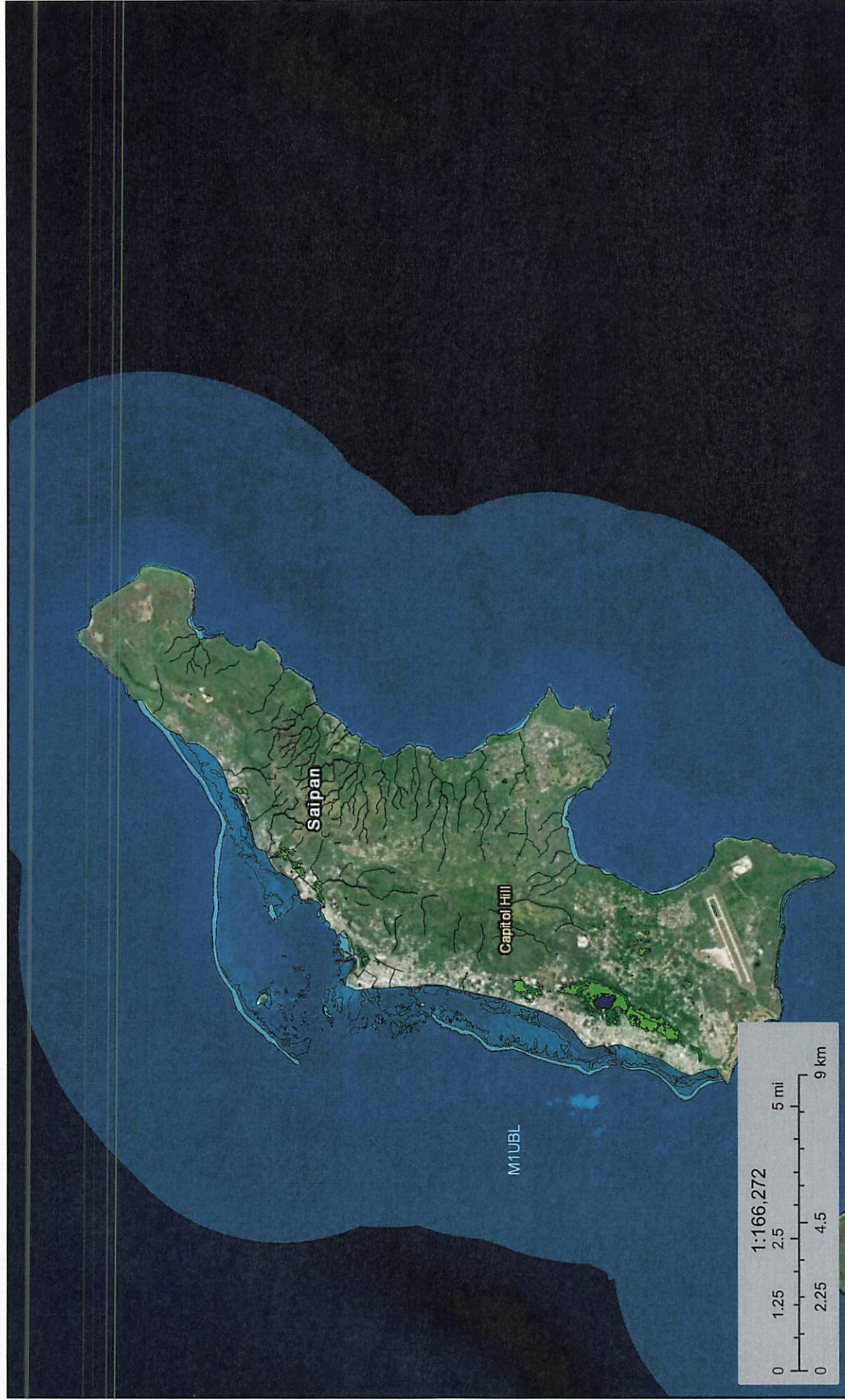
No



U.S. Fish and Wildlife Service

National Wetlands Inventory

HSEM 200-foot New Communications C



July 10, 2023

Wetlands

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

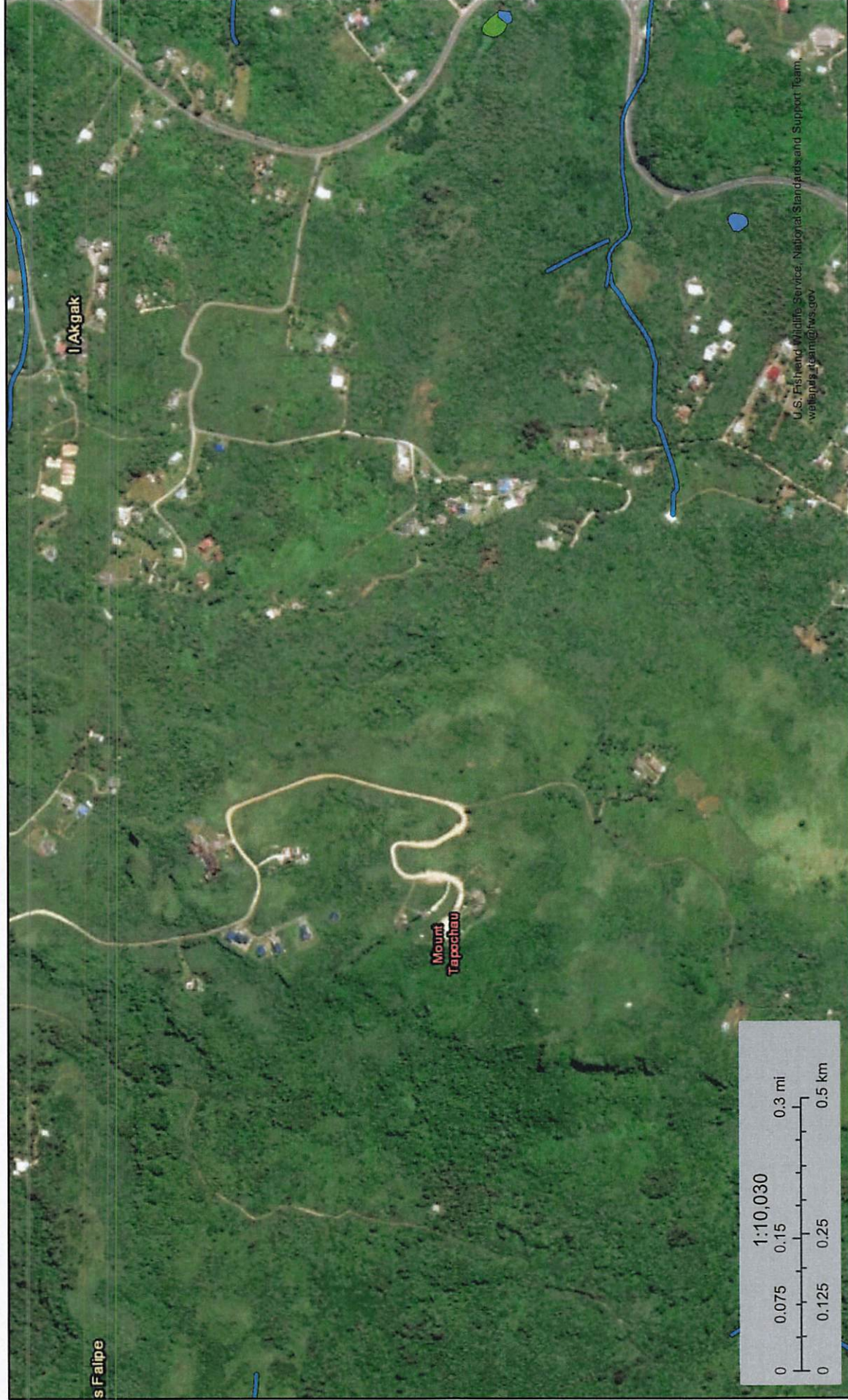
This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.



U.S. Fish and Wildlife Service

National Wetlands Inventory

HSEM 200-foot New Communications C



July 10, 2023

Wetlands

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

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

APPENDIX E

Endangered Species



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

September 1, 2023

Wilfred C. Villagomez
Project Supervisor
Northern Marianas Housing Corporation
P.O. Box 500514
Saipan, MP 96950

IR-23-38: Information Request, Determination of Effect- Homeland Security & Emergency Management Office 200-foot New Replacement Tower Project

Dear Mr. Villagomez:

Your agency has requested information from the Division of Fish and Wildlife regarding potential impacts to threatened or endangered (T&E) species for the Homeland Security & Emergency Management Office 200-foot New Replacement Tower Project located on Mt. Tapochau, Saipan, for Lot No. 117 E 01. **This letter is NOT a permit or approval of the proposed project. NO land clearing activities or construction can begin until an application has been submitted and approved by DFW.**

Based on our records, satellite imagery, and scope of work, we do not anticipate impacts to T&E species. We did not conduct a thorough site assessment and wildlife survey. However, given that the scope of work is situated on maintained grounds, it is unlikely that T&E species will be impacted.

Our response is based solely on the information you provided, our current knowledge, and professional experience. The information that we provide may assist with project planning, including information required to comply with the preparation of an Environmental Assessment Statutory Checklist.

If you have any questions, or if I can be of further assistance, please don't hesitate to contact me at (670)-664-6016

Sincerely,

Yanghongfan Wang, Threatened and Endangered Species Biologist

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 <i>et seq.</i>); 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

The project is located in Mt. Tapochau, Saipan. The CNMI Fish & Wildlife has determined that the area is already developed and appears to have no habitat for the threatened and endangered species.

Are formal compliance steps or mitigation required?

Yes

No

APPENDIX F

Farmlands Protection



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

RECEIVED
P. 1/18/22

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

Re: Request for a Determination of Effect HSEM Communications Center Tower Rehabilitation

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 HSEM Communications Center Tower Rehabilitation project located on Mt. Tapochau, Saipan. Lot# 117 E 01.

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 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




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

“NMHC is an equal employment and fair housing public agency”

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

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

FARMLAND CONVERSION IMPACT RATING

PART I (To be completed by Federal Agency)		Date Of Land Evaluation Request 1/18/2022				
Name of Project HSEM Communications Tower Rehab.		Federal Agency Involved				
Proposed Land Use		County and State Saipan, CNMI				
PART II (To be completed by NRCS)		Date Request Received By NRCS 18 JAN 2022		Person Completing Form: S. TAKAI		
Does the site contain Prime, Unique, Statewide or Local Important Farmland? <i>(If no, the FPPA does not apply - do not complete additional parts of this form)</i>		YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	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 <i>(Criteria are explained in 7 CFR 658.5 b. For Corridor project use form NRCS-CPA-106)</i>		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 <input type="checkbox"/>	NO <input type="checkbox"/>		
Reason For Selection:						
						
Name of Federal agency representative completing this form: PAMELA SABLAN, DISTRICT CONSERVATIONIST Date: 18 JAN. 2022						

(See Instructions on reverse side)



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

November 17, 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 HSEM New Replacement Communications Center Tower

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 **Homeland Security & Emergency Management Office 200-foot New Replacement Tower Project, Mt. Tapochau, Saipan, MP. Lot# 117 E 01.**

The earlier letter indicated a rehabilitation but there was a problem with the existing tower not in compliance with the new building codes. A new Communications Tower with the same footprint will be reconstructed to accommodate a new and resilient structure from future storms.

An attached copy of the earlier approved submission from your office is provided for your reference.

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 do not hesitate to contact myself at drprojectmanager@nmhcgov.net or Mr. Wilfred Villagomez at projectsupervisio@nmhcgov.net or at the numbers listed above.



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

“NMHC is an equal employment and fair housing public agency”

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

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

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jonathan T. Arriola', written over the printed name.

Jonathan T. Arriola
Project Manager

Enclosures: Map of Location
Scope of Work

U.S. Department of Agriculture

FARMLAND CONVERSION IMPACT RATING

PART I (To be completed by Federal Agency)		Date Of Land Evaluation Request 11/17/2022				
Name of Project HSEM New Replacement Comm. Tower		Federal Agency Involved NMHC				
Proposed Land Use Lot No. 117 E 01		County and State Tapochau, Saipan				
PART II (To be completed by NRCS)		Date Request Received By NRCS 17 Nov 2022		Person Completing Form: S. Takai		
Does the site contain Prime, Unique, Statewide or Local Important Farmland? <i>(If no, the FPPA does not apply - do not complete additional parts of this form)</i>		YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	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		N/A				
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 <i>(Criteria are explained in 7 CFR 658.5 b. For Corridor project use form NRCS-CPA-106)</i>		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 <input type="checkbox"/> NO <input type="checkbox"/>			
Reason For Selection:						

Name of Federal agency representative completing this form: **Pamela M. Sablan, District Conservationist** Date: **11/21/2022**

(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 - 11/21/2022
Response to Categorically Excluded Statutory Checklist
"HSEM Communication Tower - New Replacement - Tapochau, Saipan"



Prepared with assistance from USDA-Natural Resources Conservation Service



 Project Location

Farmlands Protection (CEST and EA)

General requirements	Legislation	Regulation
The Farmland Protection Policy Act (FPPA) discourages federal activities that would convert farmland to nonagricultural purposes.	Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.)	7 CFR Part 658
Reference		
https://www.hudexchange.info/environmental-review/farmlands-protection		

1. Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?

Yes → Continue to Question 2.

No

Explain how you determined that agricultural land would not be converted:

The project is replacement of an existing communications center tower.

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

2. Does “important farmland,” including prime farmland, unique farmland, or farmland of statewide or local importance regulated under the Farmland Protection Policy Act, occur on the project site?

You may use the links below to determine important farmland occurs on the project site:

- Utilize USDA Natural Resources Conservation Service’s (NRCS) Web Soil Survey <http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm>
- Check with your city or county’s planning department and ask them to document if the project is on land regulated by the FPPA (zoning important farmland as non-agricultural does not exempt it from FPPA requirements)
- Contact NRCS at the local USDA service center <http://offices.sc.egov.usda.gov/locator/app?agency=nrcs> or your NRCS state soil scientist http://soils.usda.gov/contact/state_offices/ for assistance

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.

Yes → Continue to Question 3.

3. Consider alternatives to completing the project on important farmland and means of avoiding impacts to important farmland.

- Complete form **AD-1006**, "Farmland Conversion Impact Rating" http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1045394.pdf and contact the state soil scientist before sending it to the local NRCS District Conservationist.
(NOTE: for corridor type projects, use instead form **NRCS-CPA-106**, "Farmland Conversion Impact Rating for Corridor Type Projects: http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1045395.pdf.)
- Work with NRCS to minimize the impact of the project on the protected farmland. When you have finished with your analysis, return a copy of form AD-1006 (or form NRCS-CPA-106 if applicable) to the USDA-NRCS State Soil Scientist or his/her designee informing them of your determination.

Document your conclusion:

- Project will proceed with mitigation.

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

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide form AD-1006 and all other documents used to make your determination.*

- Project will proceed without mitigation.

Explain why mitigation will not be made here:

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide form AD-1006 and all other documents 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

The project is located in Mt. Tapochau, Saipan. The HSEM 200-foot New Communications Center Tower Project is not in a farmland as per USDA Natural Resources Conservation Service.

Are formal compliance steps or mitigation required?

Yes

No

APPENDIX G

Sole Source Aquifers

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

The project is located in Mt. Tapochau, Saipan. There are no Sole Source Aquifers on Saipan.

Are formal compliance steps or mitigation required?

Yes

No

Sole Source Aquirers



1mi
145.840 15.201 Degrees

APPENDIX H

Wild and Scenic Rivers

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

The project is located in Mt. Tapochau, Saipan. There are no Wild and Scenic Rivers in Saipan.

Are formal compliance steps or mitigation required?

Yes

No

Nationwide Rivers Inventory

National Park Service
U.S. Department of the Interior

This is a listing of more than 3,200 free-flowing river segments in the U.S. that are believed to possess one or more "outstandingly remarkabl..."



APPENDIX I

Historic Preservation



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

July 21, 2022

Ms. Rita Chong-Dela Cruz
State Historic Preservation Officer
Historic Preservation Office
P.O. Box 500090
Saipan, MP 96950

Subject: National Historic Preservation Act Section 106 Consultation and “No Effect to Historic Properties,” Concurrence Request –

Dear Mrs. Chong-Dela Cruz,

Pursuant to the U.S. Department of Housing and Urban Development regulations 24 CFR 58.5 The Northern Marianas Housing Corporation, requests concurrence with your office for the proposed **Homeland Security & Emergency Management Office 200-foot Tower Rehabilitation Project, Mt. Tapochau, Saipan, MP.**

Due to the utilization of Federal funds, this project has been identified as an “undertaking” with respect to the National Historic Preservation Act (NHPA) of 1966, as amended. This consultation is therefore being conducted in accordance with Section 106 of the NHPA and implementing regulations found in § 36 CFR Part 800 through coordination with the Infrastructure and Recovery Program (IRP) office.

In order for our office to complete the Environmental Review, an Environmental Assessment Statutory Checklist (24 CFR § 58.35) must be completed. Upon further review of documentations and mapping, we found that there are no historic properties within the area. NMHC kindly requests your concurrence with this determination.

Project Description

The Northern Marianas Housing Corporation is proposing to utilize the Community Development Block Grant Disaster Recovery (CDBG-DR) funds for the renovations to the repairs and replacement of the existing communication tower from a rusted tower to a more resilient proposed tower. There will be no earthmoving or digging for this project but a repainting from concrete base to 20 feet, above 20 feet is a corrosion work or replacement to 200 feet up the tower. It will be a replacement of beams, bolts and new metal structure that will retrofit the existing tower to a more resilient one.



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

“NMHC is an equal employment and fair housing public agency”

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NORTHERN MARIANAS HOUSING CORPORATION
Community Development Block Grant – Disaster Recovery (CDBG-DR) Division

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

Finding of Effect

The proposed CDBG-DR has determined that this project will have **“no adverse effect”** on historic properties since all of the work performed will be to repair or replace existing infrastructure with minimal ground disturbance. However, there is always a possibility of inadvertent findings during construction. If this occurs, all earthmoving activities will stop and your office will be consulted before continuing with the work. All required permits will be obtained prior to construction. We request your concurrence with our determination.

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
NMHC CDBG DR



**NMHC- CDBG-DR
RECEIVED**

By: _____
Date: _____
Time: _____

Enclosures:
Project Site Map
Google Map.
Scope of Work

Based on the above request for concurrence:

Concurred By: 
Rita Chong-Dela Cruz
State Historic Preservation Officer

Date: 27 July 2022

Serial #: 35227



“NMHC is an equal employment and fair housing public agency”

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

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

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:

→ *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 located in Mt. Tapochau, Saipan. The attached findings from Applied Archaeology Survey Report indicated "No Historic Properties Affected" and "No Further Work is recommended."

Are formal compliance steps or mitigation required?

Yes

No

**APPLIED ARCHAEOLOGY, INC.
ARCHAEOLOGICAL SURVEY REPORT**

Report Title: Survey for a Proposed Homeland Security and Emergency Management Office
200-foot New Tower Replacement Project Northern Marianas Housing
Corporation, CDBG-DR

Work Order #: DR Infrastructure-01-2023

Island: Saipan

Village: Mount Tapochao

Lot/Tract Number: 117 E 01

GPS Coordinates: N 15.186858, E 145.743567

Lot Size: 1342 square meters (0.1342 ha)

Applicant Name: Wilfred C. Villagomez

Program Type: NMHC CDBG-DR Infrastructure

Principal Investigator: Michael F. Dega, Ph.D.

NMHC Field Representatives: Melvin M. Sablan, Derol Tudela, Michael Fields

Field Inspection by: David Perzinski

Inspection Date: June 15, 2023

Report Prepared by: D. Perzinski

Report Date: June 18, 2023

Evaluation: No Adverse Effect

Recommendations: No Further Work

Description of the Undertaking: The proposed undertaking would consist of the replacement of the existing communication tower with a new 200-foot steel tower located near the summit of Mt. Tapochao. Construction activities are proposed to include the removal of the existing tower and footings, and the excavation of a new, deeper foundation into the existing bedrock. This activity has been found to meet the definition of an undertaking pursuant to Title 36 Code of Federal Regulations § 800.16(y). As a result, Northern Marianas Housing Corporation is required to comply with Section 106 of the NRHP.

The project area of potential effect (APE), previous archaeological research, and historic background are illustrated in Figures 1 through 6.



Figure 1: USGS map showing location of project area.



Figure 2: Aerial image showing the location of the APE (Google Earth, 2022).

RESULTS OF FIELDWORK:

Methods: Archaeological field inspection and 100% pedestrian survey.

Topography of Survey Area: The APE is located along the steep eastern flank of the Mount Tapochao summit. The APE and parking lot to the north are flat and graded while the areas outside the hollow block walls are extremely steep with exposed limestone and thick vegetation.

Elevation: 460 meters

Soils: Young (1989) classifies the soils in the project area as “Takpochao-Chinen-Rock Outcrop” that are “Shallow, well drained, strongly sloping to extremely steep soils, and Rock outcrop; on limestone escarpments and plateaus” (Young, 1989:13).

Vegetation: Vegetation in the APE is low-cut grass.

Has the APE been disturbed? If yes, describe:

The APE for this project includes the area within the walled communication tower compound. And previous disturbances have occurred in the project area since at least WWII. A 1945 aerial photo, taken after the massive, island-wide rebuilding efforts had begun, shows that the project area had been bulldozed and/or covered in crushed limestone (Figure 4). A larger military installation is shown less than 50 m to the east that consisted of roughly two dozen Quonset huts. The current condition of the APE is the result of the construction of the existing steel communication tower and outbuildings that is believed to have occurred in the 1990 (Steven Aguon, DHS&EM), personal communication, 6/15/2023). It is unknown how much soil was removed, but the level topography in the majority of the APE with cut limestone and a masonry block wall around the perimeter indicates that earthmoving was required to bring the land into its current condition.

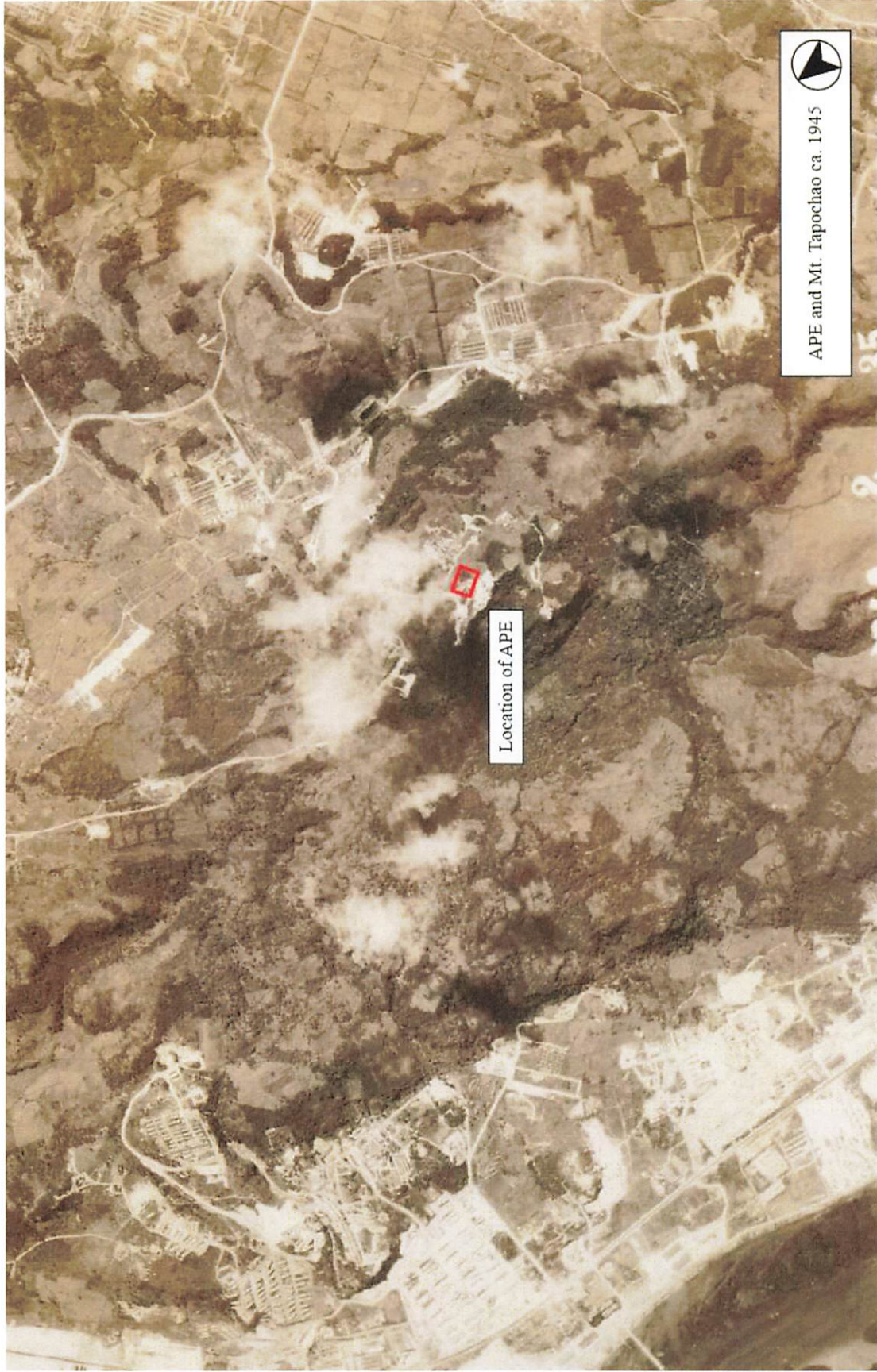


Figure 4: Aerial photo from 1945 showing location of APE.

SURVEY FINDINGS

Eligible Properties: 0

Isolates: 0

The pedestrian survey was conducted on June 15, 2023, and included confirming the lot boundaries, photo documentation of the property and written documentation of the conditions and environment of the APE.

The project area is located on the south side of the Mount Tapochao summit parking lot. The lot is surrounded by a concrete block wall and is accessed through a steel gate. Around the wall are steep cliffs leading down the east side of the property and to the summit on the west side.

The survey did not locate or document any historic or prehistoric sites or deposits. Six buildings and several water and fuel tanks were documented, though none are over 50 years old. Figures 5 through 14 show the existing structures and tower. The remaining portion of the APE did not contain any surface sites or scatters and it is doubtful that any exist within the APE.

LITERATURE SEARCH:

Previous Inventories:

Within APE: 0

Within 500 meters: 0

Previously Recorded Sites:

Within APE: 0

Within 500 meters: 0

NRHP of NHL Sites

Within APE: 0

Within 500 meters: 0

Within HPO Archaeological Sensitivity Zone? No

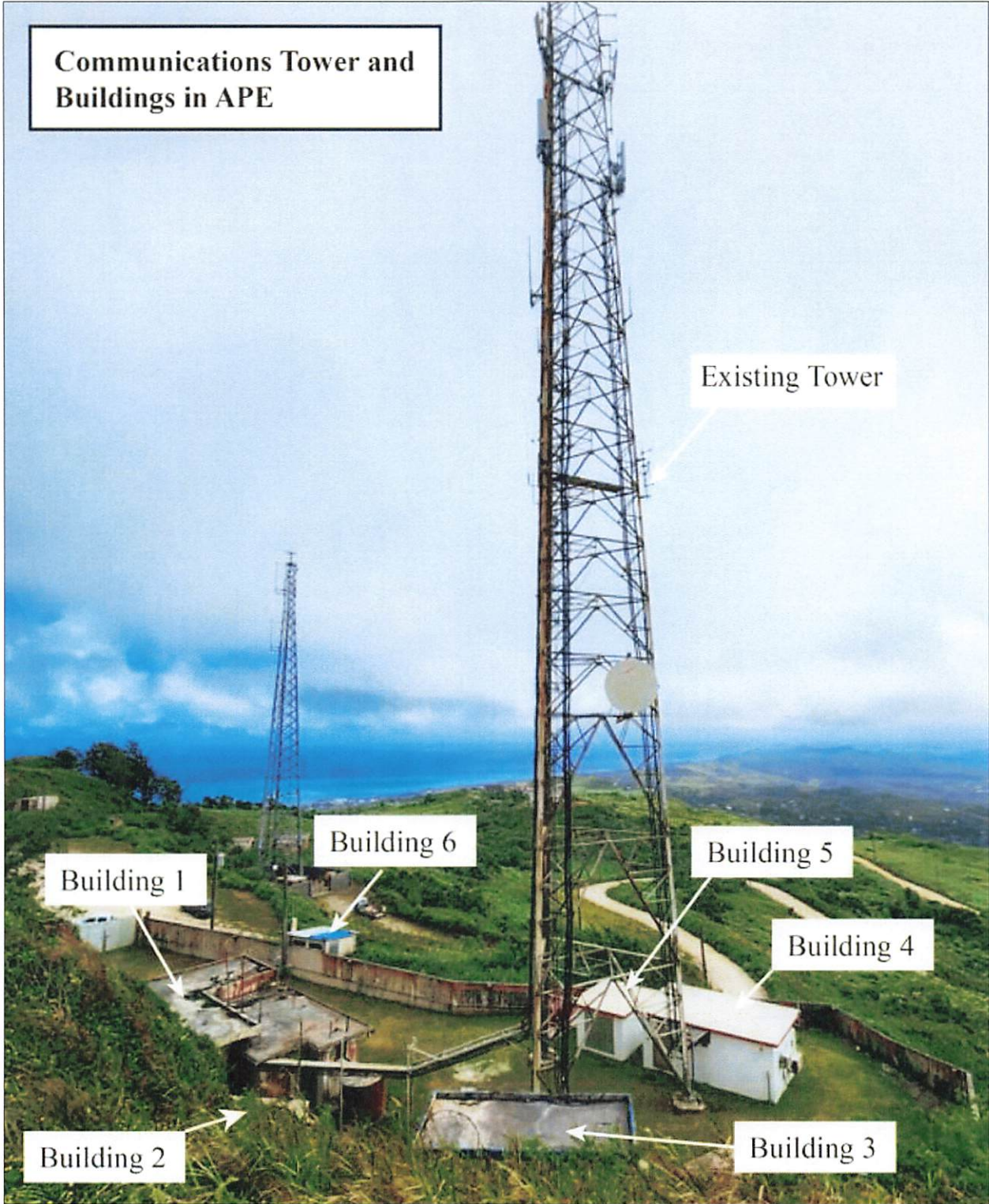


Figure 5: View north of existing tower and compound from summit (photo: D. Perzinski, 6/15/23).



Figure 6: View northeast of tower base and communications buildings from southeast end of compound (photo: D. Perzinski, 6/15/23).



Figure 7: View southeast of bedrock cut and wall on southern end of tower compound (photo: D. Perzinski, 6/15/23).

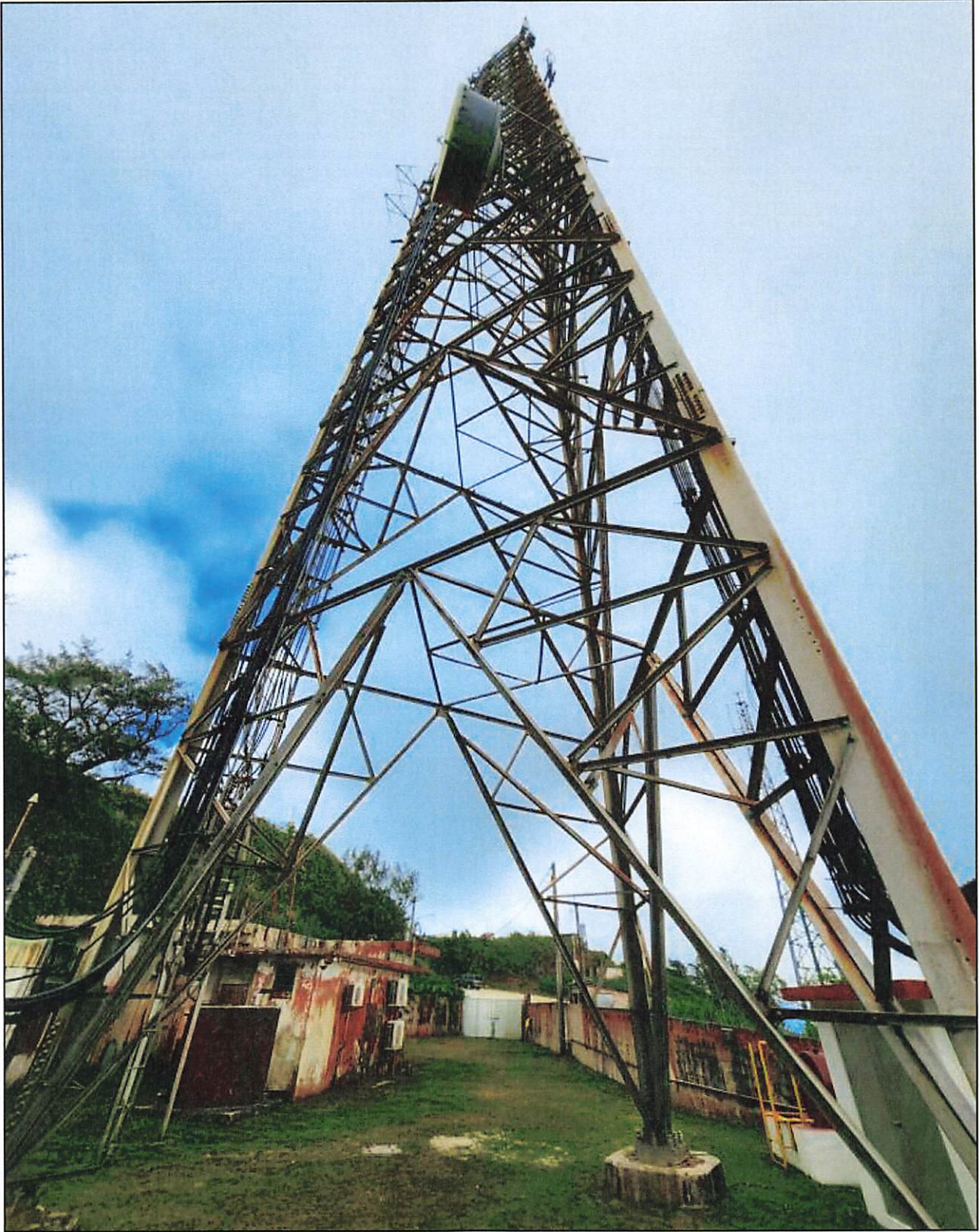


Figure 8: View northwest from base of existing tower (photo: D. Perzinski, 6/15/23).



Figure 9: View south of north corner of Building 1 (photo: D. Perzinski, 6/15/23).



Figure 10: View west of east corner of Building 2 and fuel tank (photo: D. Perzinski, 6/15/23).



Figure 11: View west of east corner of Building 3 with western leg of tower on right side of photo (photo: D. Perzinski, 6/15/23).



Figure 12: View northeast of southwest elevation of Building 4 and southeaster leg of tower (photo: D. Perzinski, 6/15/23).



Figure 13: View southwest of northeast elevation of Building 5 and tank (photo: D. Perzinski, 6/15/23).



Figure 14: View southeast of northwest elevation of Building 6 (photo: D. Perzinski, 6/15/23).

SUMMARY OF FINDINGS:

Per 36 CFR §800.4(b)(1), Applied Archaeology made reasonable and good faith identification efforts to determine if any historic properties exist within or near the area of potential effect. The research included literature searches of previous archaeological studies in Saipan and searches on the NRHP and National Historic Landmark databases. Applied Archaeology also conducted a pedestrian survey and pre-construction inspection to identify any existing sites or deposits and evaluate the undertaking's potential to affect historic properties within the APE.

Previous archaeological research in the mountainous inland portion of Saipan has been limited by the overall lack of commercial or government development. A few studies (Hornbostel, n.d.; Marck, 1980) offered generalized settlement patterns in the inland areas, but intense systematic survey of inland locales has been limited to small parcels (see Harper et al., 2002; Cleghorn et al., 1999; Graves and Moore, 1986; Dega, 2021). Inland settlement appears to have begun during the late Transitional Period (ca. A.D. 700) and expanded considerably during the Latte Period (ca. A.D. 900). Large inland Latte sets exist, but few have undergone the intensive research that coastal sites have received. Two sites, Kannat Tabla (CNMI Site: SP-1-0963) (Dega, 2021) and Chalan Galaide (NRHP Reg. #8701559) (Graves and Moore, 1986), have yielded important information on inland site development and settlement as well as insights into social hierarchy, trade and ceramic production.

Inland utilization was likely occurring from the earliest arrival of humans and continued through initial settlement of the southern islands of the Marianas. Intensification and more prolonged use of inland areas is believed to have begun during the Transitional Period, with an increase in starches and carbohydrates such as yams, breadfruit, grains, banana and taro in the diet. (see McGovern-Wilson and Quinn, 1996). Though Mt. Tapochao or its flanking slopes have not undergone survey, it seems reasonable that the highest peak on the island possessed some significance in prehistoric times.

During the Japanese Administration, intensive agricultural activities occurred around the mountainside of Tapochao, but is not believed to have occurred at the summit or within the APE. The subsequent invasion of Saipan during WWII, battles around the summit, and massive reconstruction efforts following the war all but obliterated any remaining surface sites.

Prior to the construction of the current tower, the most significant activities to occur within the APE happened during the Battle of Saipan and the seizure of Mt. Tapochao. On June 25, 1944, following the storming of the beaches in southwest Saipan, U.S. forces, led by the 1st Battalion, 29th Marines and the 2d Battalion, 8th Marines made a final push up the ridgelines leading to the summit (Hoffman, 1950). The route taken by the 8th Marines passed through the project area via the ridge just south of the APE and marked as a "plateau" (Figure 15). From a position taken on the plateau where the APE lies, the 8th Marines could see the peak above the 50 foot cliff that

halted their advance. Not knowing if there were enemy positions on the peak, the commanding officer ordered the 1st Platoon, Company E up the cliff where they found no resistance. Just west of the 8th, the 29th Marines moved up the valley and joined the 1st Platoon to continue to the top. On the summit, the Marines found “an abandoned square, 12-man dugout, which the Marines immediately put to their own use” (Hoffman, 1950:152). It was from this position that the Marines “from this point forward... could now fight downhill for awhile” (ibid.:143) (Figure 16).

EVALUATION AND RECOMMENDATION:

An archaeological assessment and pedestrian survey was undertaken with the proposed APE by Applied Archaeology. No prehistoric or historic surface sites, scatters or structures were encountered. A literature review did not find any studies that included the project area. Historic accounts show that the APE was used as a staging position for the U.S. Marine Corps during their seizure of Mt. Tapochao. Based on available records, the existing structures within the APE does not meet the 50-year requirement for consideration for listing in the NRHP.

Based on the above findings, Applied Archaeology finds that the proposed undertaking will result in **NO HISTORIC PROPERTIES AFFECTED** during the replacement of the communication tower. No previously documented sites were encountered, and no additional sites were found. Thus, **NO FURTHER WORK** is recommended during any above or subsurface construction activities within the APE. However, if during the course of unmonitored construction any archaeological or historic sites or deposits are encountered, all construction activities will cease. HPO will be notified of the find and work will cease until measures are taken to minimize or reduce harm to the site or deposit

Signature of Principal Investigator:

A handwritten signature in blue ink, appearing to read 'Michael F. Dega'.

Michael F. Dega, Ph.D., Applied Archaeology

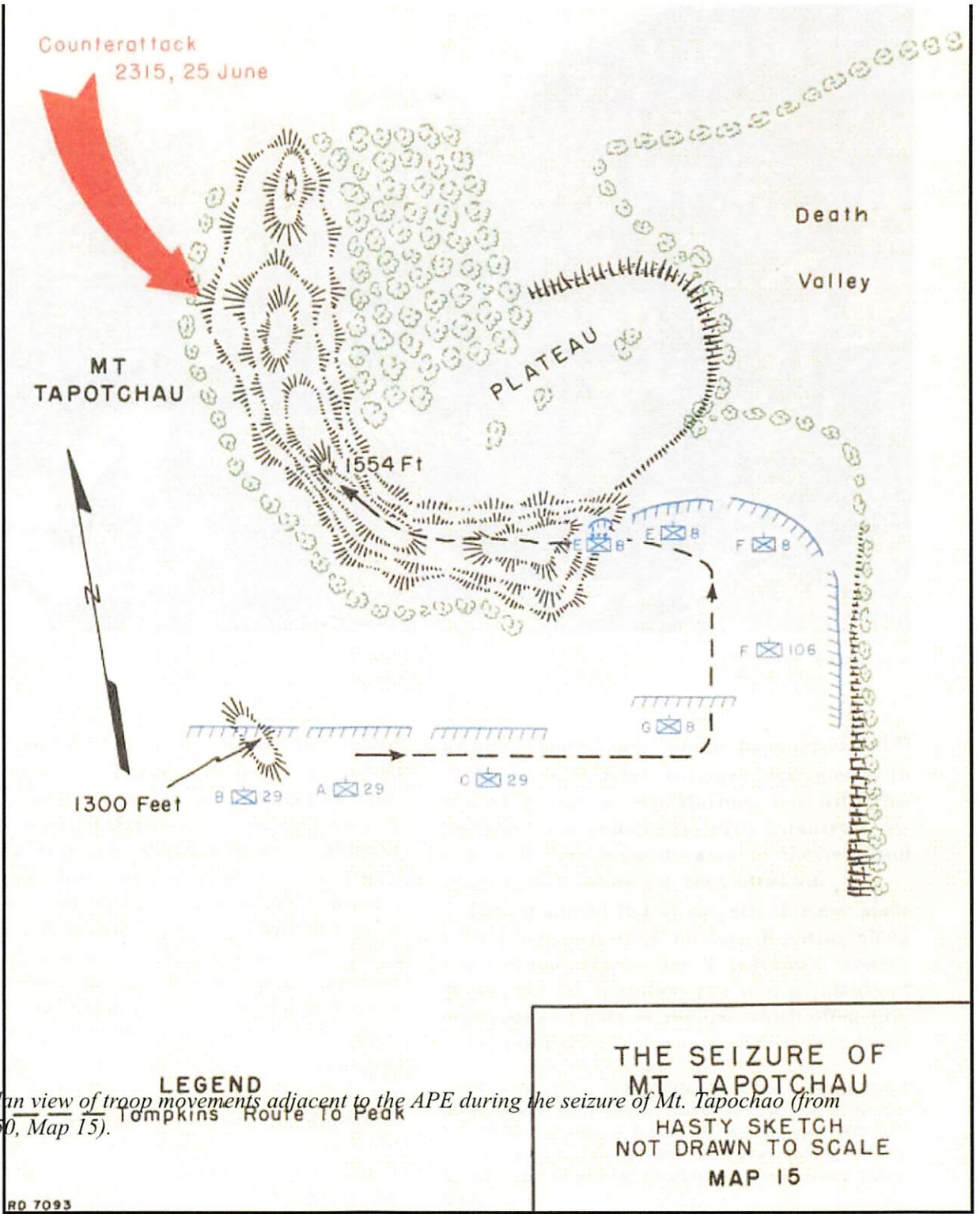


Figure 15: Plan view of troop movements adjacent to the APE during the seizure of Mt. Tapochao (from Hoffman, 1950, Map 15).



Figure 16: Marine perched on summit viewing the southwestern coast of Saipan following the seizure of Mt. Tapochao (from Hoffman, 1950:154).

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APPENDIX J

Environmental Justice

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

The project is located in Mt. Tapochau, Saipan. The HSEM 200-foot New Communications Center Tower Project will not create an adverse impact upon a low-income or minority community.

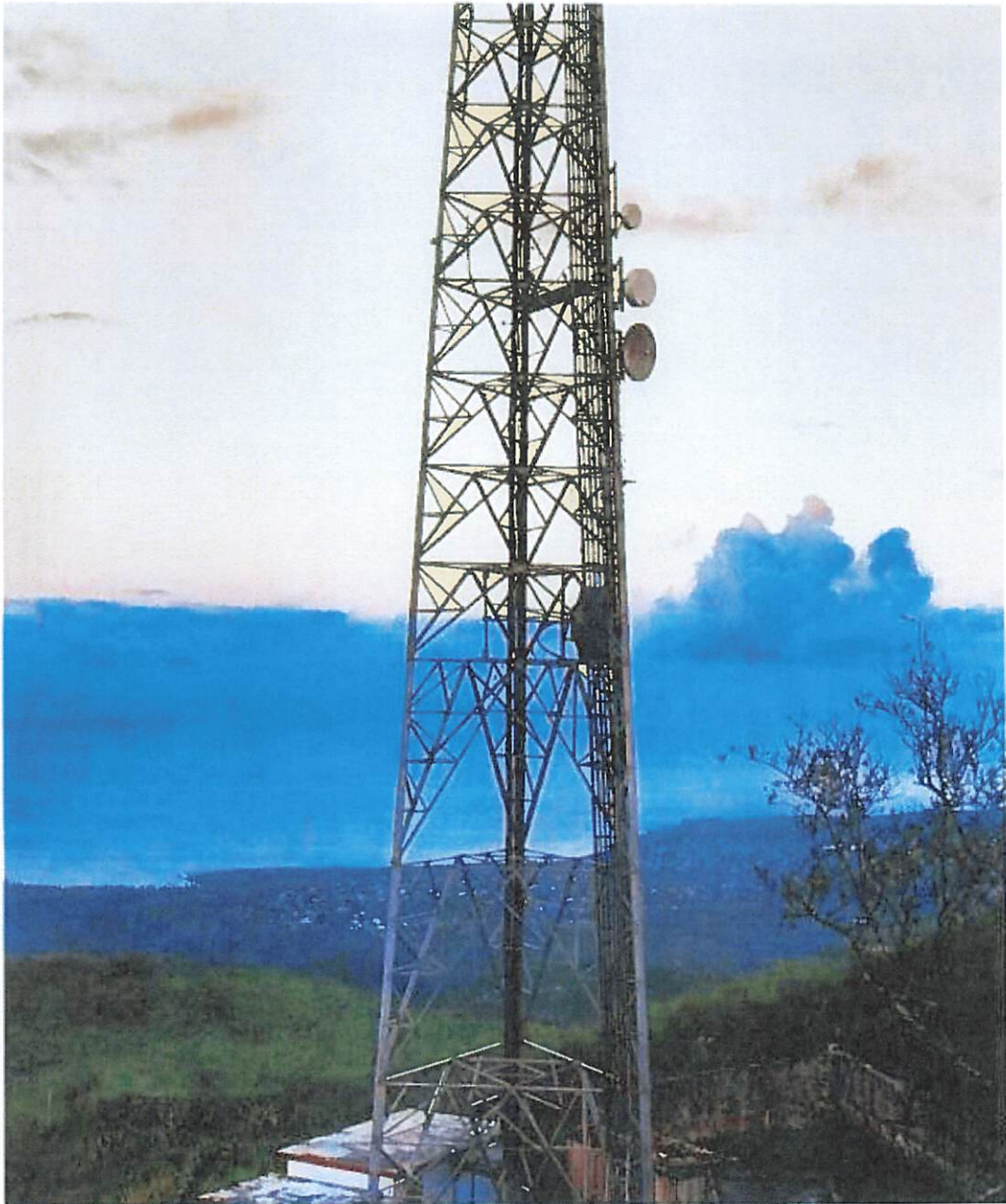
Are formal compliance steps or mitigation required?

Yes

No

APPENDIX K

**HSEM Tower Inspection Report
Proposed A&E Design New Tower**



TOWER INSPECTION REPORT

FY 2015

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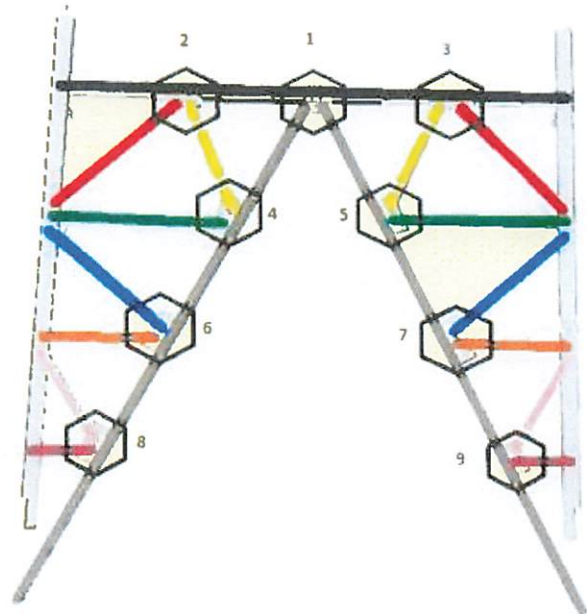
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STRUCTURAL REVIEW

Structural Review

ANDREW 200FT. 3ST COMMUNICATION TOWER

QTY.	Description	Photo	
3	3/4" x 20 x 20"	N/A	
12	4 x 4	N/A	
6	3 x 3-1/2	O 20 (13)	
12	2-1/2" x 2-1/2"	N/A	
12	2-1/2" x 2-1/2"	N/A	
12	2 x 2	O 20 (18)	
12	2 x 2	O 20 (19)	
12	1-3/4" x 1-3/4"	O 20 (6)	
12	1-3/4" x 1-3/4"	N/A	
12	1-3/4" x 1-3/4"	O 20 (3)	
1	7	Gusset Plate	O 20 (20)
2	4	Gusset Plate	N/A
3	4	Gusset Plate	N/A
4	4	Gusset Plate	N/A
5	4	Gusset Plate	N/A
6	4	Gusset Plate	N/A
7	4	Gusset Plate	N/A
8	4	Gusset Plate	O 20 (1)
9	4	Gusset Plate	O 20 (4)



0' - 20'

20ft section with typical K-Brace. All angles are back-to-back with stitch washer and gusset plate

Climbing ladder to 20ft.

Coax on each face

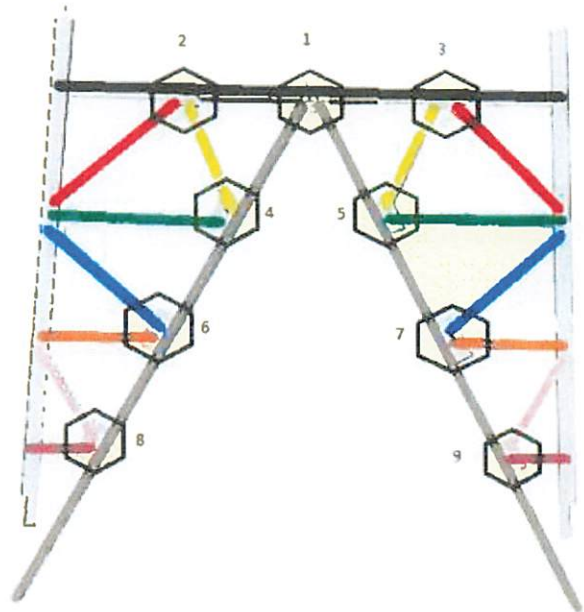
This section does not have Antennas

STRUCTURAL REVIEW

STRUCTURAL REVIEW

Andrew 200ft. 3st Communication tower

QTY.	Description	Photo	
3	3/4" x 20 x 20"	20 40 (1)	
12	3-1/2" x 3-1/2"	20 40 (4)	
6	3 x 3	20 40 (13)	
12	2-1/2" x 2-1/2"	20 40 (15)	
12	2-1/2" x 2-1/2"	N/A	
12	2 x 2	20 40 (5)	
12	2 x 2	20 40 (24)	
12	1-3/4" x 1-3/4"	20 40 (3)	
12	1-3/4" x 1-3/4"	20 40 (2)	
12	1-3/4" x 1-3/4"	20 40 (2)	
1	7	Gusset Plate	20 40 (7)
2	4	Gusset Plate	20 40 (10)
3	4	Gusset Plate	20 40 (10)
4	4	Gusset Plate	20 40 (8)
5	4	Gusset Plate	20 40 (8)
6	4	Gusset Plate	20 40 (24)
7	4	Gusset Plate	20 40 (24)
8	4	Gusset Plate	N/A
9	4	Gusset Plate	N/A



20' - 40'

20ft section with typical K-Brace. All angles are back-to-back with stitch washer and gusset plate

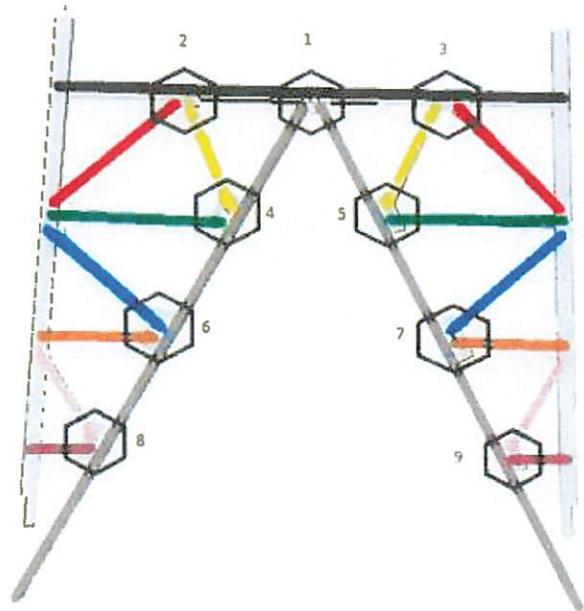
Climbing ladder to 20ft.

Coax on each face.

This section does not have Antennas

STRUCTURAL REVIEW

QTY.	Description	Photo	
3	3/4" x 20 x 20'	40 60 (3)	
12	4 x 4	40 60 (2)	
6	3 x 3-1/2"	N/A	
12	2-1/2" x 2-1/2"	N/A	
12	2-1/2" x 2-1/2"	N/A	
12	2 x 2	N/A	
12	2 x 2	N/A	
12	1-3/4" x 1-3/4"	40 60 (5)	
12	1-3/4" x 1-3/4"	40 60 (6)	
12	1-3/4" x 1-3/4"	40 60 (2)	
1	7	Gusset Plate	N/A
2	4	Gusset Plate	N/A
3	4	Gusset Plate	N/A
4	4	Gusset Plate	N/A
5	4	Gusset Plate	N/A
6	4	Gusset Plate	N/A
7	4	Gusset Plate	N/A
8	4	Gusset Plate	40 60 (1)
9	4	Gusset Plate	40 60 (4)



40' - 60'

20ft section with typical K-Brace. All angles are back-to-back with stitch washer and gusset plate

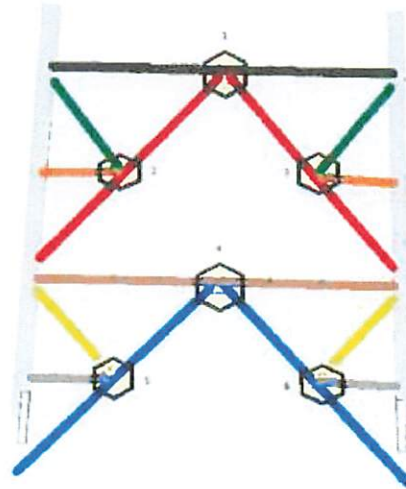
Climbing ladder to 20ft.

Coax on each face.

This section does not have Antennas

STRUCTURAL REVIEW

QTY	Description 60'-80'	Photo
3	7 x 5/8"	60 80 (1)
6	2-1/2" x 2-1/2"	60 80 (7)
12	3 x 3	60 80 (5)
6	2-1/2" x 2-1/2"	60 80 (17)
6	3 x 3	60 80 (17)
6	2-1/2" x 2-1/2"	60 80 (23)
12	3 x 3	60 80 (3)
6	3 x 3	60 80 (24)
6	2-1/2" x 2-1/2"	60 80 (2)
1	Gusset Plate	60 80 (9)
2	Gusset Plate	60 80 (17)
1	Gusset Plate	60 80 (16)
4	Gusset Plate	
5	Gusset Plate	60 80 (16)
6	Gusset Plate	60 80 (11)



60' - 80'

20ft section with typical K-Brace. Main horizontal, diagonal angles are back-to-back with stitch washer and gusset plate. Sub angles are single and bolted to the outside.

Climbing ladder 20ft.

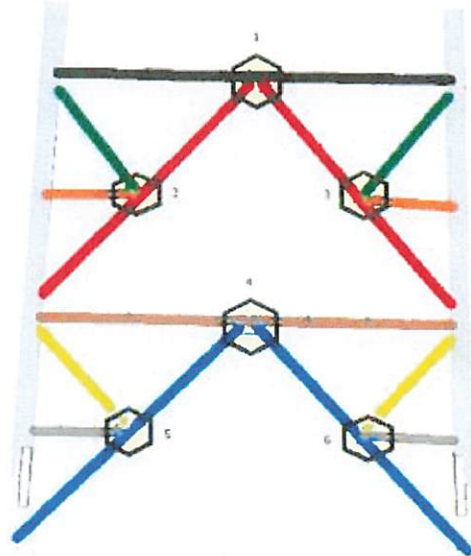
Coax on each face

This section has Antennas:

- 65ft, 1ea. HP Dish Antenna, 8ft. w/2ea. EW 52 waveguide View-Inspection/ant/60
- 73ft, 1ea. Stick Antenna, 2ft. w/ 1ea. 3/8" coax, 2ft Leg Stand-off View-Inspection/ant/70

STRUCTURAL REVIEW

QTY	Description	80' - 100'	Photo
3	6 x 5/8"	80 100 (10)	
6	3 x 3	80 100 (19)	
12	3 x 3	80 100 (11)	
6	2-1/2" x 2-1/2"	80 100 (6)	
6	3 x 3	80 100 (12)	
6	3 x 3	80 100 (20)	
12	3 x 3	80 100 (30)	
6	3 x 3	80 100 (25)	
6	2-1/2" x 2-1/2"	80 100 (26)	
1	Gusset Plate	80 100 (17)	
2	Gusset Plate	80 100 (8)	
3	Gusset Plate	80 100 (6)	
4	Gusset Plate	80 100 (4)	
5	Gusset Plate	80 100 (24)	
6	Gusset Plate	80 100 (27)	



80' - 100'

20ft section with typical K-Brace. Main horizontal, diagonal angles are back-to-back with stitch washer and gusset plate. Sub angles are single and bolted to the outside.

Climbing ladder 20ft.

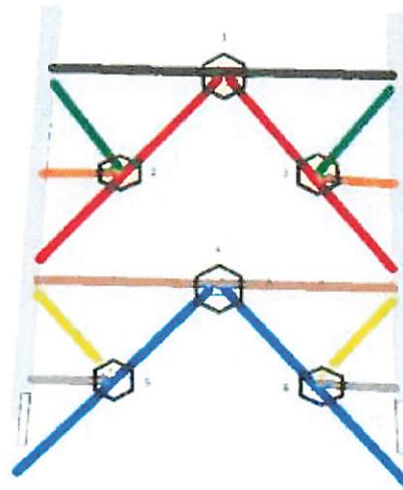
Coax on each face.

This section has Antennas:

- 90ft, 1ea. Dish Antenna, 2ft. w/ 1ea. 7/8" coax View-Inspection/ant/90ft
- 93ft, 1ea. Grid Dish Antenna, 4ft. w/ 1ea. 7/8" coax View-Inspection/ant/93ft
- 100ft, 1ea. grid Antenna, 2ft. w/ 1ea. 7/8" coax View-Inspection/ant/100ft (1)
- 100ft, 1ea. HP Dish Antenna, 4ft. w/ 2ea. 3/8" coax View-Inspection/ant/100ft (4)
- 100ft, 1ea. FM Bay Antenna, 12ft. w/ 1ea. 1/2" coax View-Inspection/ant/100ft (2)
- 100ft, 1ea. stick Antenna, 5ft. w/ 1ea. 3/8" coax View-Inspection/ant/100ft (3)

STRUCTURAL REVIEW

QTY	Descr pt on 100' - 120'	Photo
3	6 x 1/2"	100 120 (9)
6	2 x 2"	100 120 (19)
12	3 x 3"	100 120 (5)
6	2 x 2"	100 120 (17)
6	2 x 2"	100 120 (17)
6	2 x 2"	100 120 (16)
12	3 x 3"	100 120 (13)
6	2-1/2" x 2 1/2"	100 120 (20)
6	2 x 2"	100 120 (14)
1	Gusset Plate	100 120 (18)
2	Gusset Plate	100 120 (3)
1	Gusset Plate	100 120 (15)
4	Gusset Plate	100 120 (12)
2	Gusset Plate	100 120 (21)
4	Gusset Plate	100 120 (21)



100' - 120'

20ft section with typical K-Brace. Main horizontal, diagonal angles are back-to-back with stitch washer and gusset plate. Sub angles are single and bolted to the outside.

Climbing ladder 20ft.

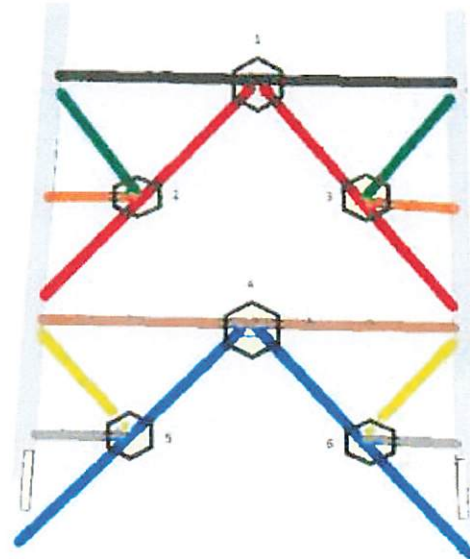
Coax on each face

This section has Antennas:

- | | |
|--|-------------------------------|
| • 105ft, 1 ea. Camera w/ 1ea. CAT5 cable | View-Inspection/ant/105ft (1) |
| • 105ft, 1ea. Laser Light w/ 1ea. 3/4" flex conduit | View-Inspection/ant/105ft (2) |
| • 107ft, 1ea. HP Dish Antenna, 4ft. w/ 2ea. EW90 waveguide | View-Inspection/ant/107ft |
| • 110ft, 1ea. Stick Antenna, 18" w/ 1ea. 3/8" coax | View-Inspection/ant/110ft |
| • 120ft, 1ea. Laser Light w/ 1ea. 3/4" flex conduit | View-Inspection/ant/120ft |

STRUCTURAL REVIEW

Qty	Description	120' - 140'	Photo
3	6 x 1/2"	120 140 (6)	
6	2-1/2" x 2-1/2"	120 140 (15)	
12	3 x 3	120 140 (15)	
6	2 x 2	120 140 (19)	
6	2 x 2	120 140 (11)	
6	2-1/2" x 2-1/2"	120 140 (3)	
12	3 x 3	120 140 (20)	
6	2 x 2	120 140(12)	
6	2 x 2	120 140 (1)	
1	Gusset Plate	120 140 (9)	
2	Bolt	120 140 (22)	
3	Bolt	120 140 (22)	
4	Gusset Plate	120 140 (4)	
5	Bolt	120 140 (24)	
6	Bolt	120 140 (24)	



120' - 140'

20ft section with typical K-Brace. Main horizontal, diagonal angles are back-to-back with stitch washer and gusset plate. Sub angles are single and bolted together inside and outside.

Climbing ladder 20ft.

Coax on each face

This section has Antennas:

- 125ft, 1ea. FM Bay Antenna, 10ft. w/ 1ea. 1/2" coax
- 135ft, 3ea. Stick Antenna(one each leg), 3ft. w/ 3ea. 1/2" coax total

View-Inspection/ant/125ft

View-Inspection/ant/135ft

- 140ft, 1ea. Stick-Element antenna, 10ft. w/ 1ea. 1/2" coax
- 150ft, 1ea. Stick antenna, 10ft. w/ 1ea. 7/8" coax
- 154ft, 1ea. Panel antenna, 5ft. w/o coax
- 155ft, 2ea. Panel antenna (on separate legs), 6ft. w/4ea. 7/8" coax total

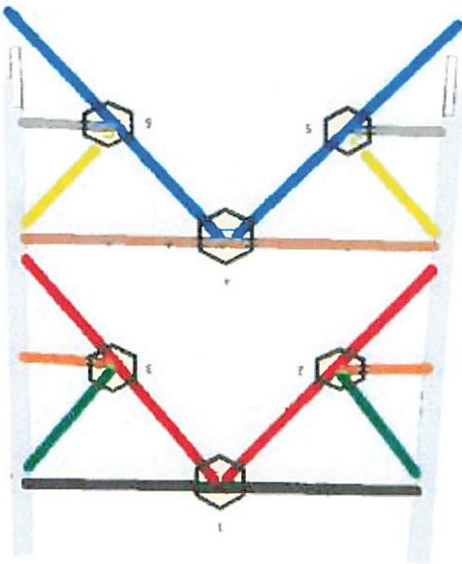
This section has Antennas:

Coax on each face

Climbing ladder 20ft.

20ft section with typical K-Brace. Main horizontal, diagonal angles are back-to-back with stitch washer and gusset plate. Sub angles are single and bolted together inside and outside.

140' - 160'



Item	Description	Quantity	Material
3	5 x 1/2"	140 160 (11)	
6	2 x 2	140 160 (28)	
12	2-1/2" x 2-1/2"	140 160 (12)	
6	2 x 2	140 160 (41)	
6	2 x 2	140 160 (10)	
6	2 x 2	140 160 (48)	
12	2-1/2" x 2-1/2"	140 160 (9)	
6	2 x 2	140 160 (9)	
6	2 x 2	140 160 (4)	
1	Gusset Plate	140 160 (21)	
2	Bolt	140 160 (13)	
3	Bolt	140 160 (13)	
4	Gusset Plate	140 160 (2)	
5	Bolt	140 160 (1)	
6	Bolt	140 160 (3)	

Q7V Description 140' - 160' Photo

STRUCTURAL REVIEW

- 178ft, 3ea. Remote Radio Unit, 2' x 2' x 10" w/1ea. 7/8" cord from Remote Radio Unit
 - 173ft, 6ea. Panel antenna, 6ft. (two each leg, on dual antenna mount), Three ant. w/6ea. 7/8" coax total, three ant. w/ 6ea. 1/2" coax jumper
 - 164ft, 3ea. Panel antenna, 5ft. (one each leg), w/13ea. 7/8" coax total
- This section has Antennas:

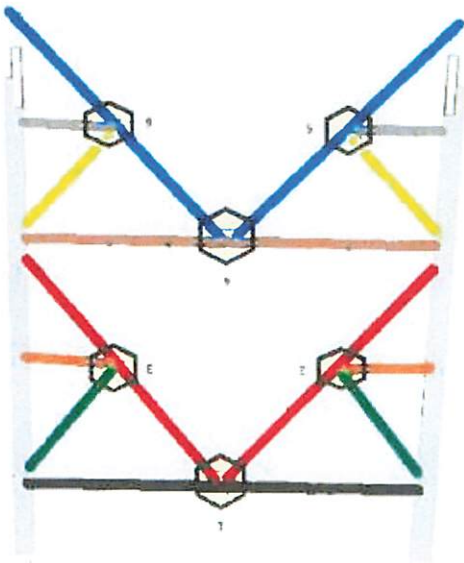
Coax on each face

Climbing ladder 20ft.

20ft section with typical K-Brace. Main horizontal, diagonal angles are back-to-back with stitch washer and gusset plate. Sub angles are single and bolted together inside and outside.

160' - 180'

Qty	Description	160	180
3	4 x 7/16"	160 180 (2)	
6	2 x 2	160 180 (23)	
12	2 x 2	160 180 (47)	
6	2 x 2	160 180 (47)	
6	2 x 2	160 180 (43)	
6	2 x 2	160 180 (38)	
6	2 x 2	160 180 (9)	
6	2 x 2	160 180 (37)	
6	2 x 2	160 180 (4)	
1	Gusset Plate	160 180 (20)	
2	Boit	160 180 (53)	
3	Boit	160 180 (53)	
4	Gusset Plate	160 180 (8)	
5	Boit	160 180 (50)	
6	Boit	160 180 (50)	



View-Inspection/ant/173ft
View-Inspection/ant/178ft

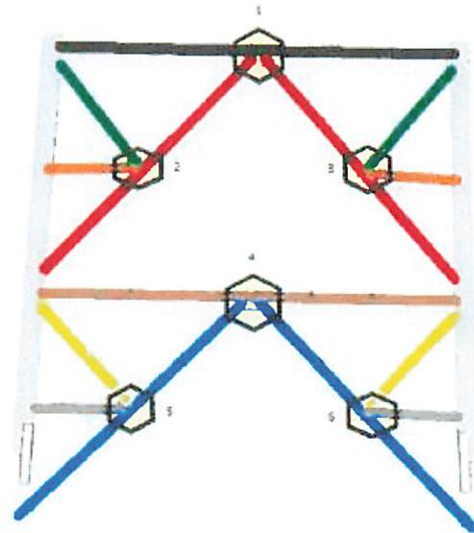
View-Inspection/ant/164ft

Photo 160 180 Description

STRUCTURAL REVIEW

STRUCTURAL REVIEW

QTY	Description	180' - 200'	Photo
3	3 x 3/8"	180 200 (4)	
6	2 x 2	180 200 (73)	
12	2 x 2	180 200 (36)	
6	2 x 2	180 200 (78)	
6	2 x 2	180 200 (52)	
6	2 x 2	180 200 (46)	
12	2 x 2	180 200 (109)	
6	2 x 2	180 200 (110)	
6	2 x 2	180 200 (108)	
1	Gusset Plate	180 200 (93)	
2	Bolt	180 200 (87)	
3	Bolt	180 200 (87)	
4	Gusset Plate	180 200 (23)	
5	Bolt	180 200 (107)	
6	Bolt	180 200 (107)	



180' - 200'

20ft section with typical K-Brace. Main horizontal, diagonal angles are back-to-back with stitch washer and gusset plate. Sub angles are single and bolted together inside and outside.

Climbing ladder 20ft.

Coax on each face

This section has Antennas:

- 180ft, 6ea. Panel antenna, 6ft. (two each leg, on dual antenna mount) w/ 12ea. 7/8" coax total.
- 182ft, 1ea. Stick antenna, 4ft w/ 1ea. 7/8" coax
- 190ft, 1ea. Stick antenna, 1ft. w 1ea. 1/2" coax
- 193ft, 1ea. Grid antenna, 2ft. w/ 1ea. 1/2" coax
- 194ft, 1ea. Stick antenna, 4ft. w/1ea. 7/8" coax
- 195ft, 1ea. Unused mount, 5ft w/o coax
- 200ft, 1ea. Stick antenna, 4ft w/ 1ea. 7/8" coax
- 200ft, 1ea. Stick antenna, 3ft. w/ 1ea. 1/2" coax

View-Inspection/ant/180ft
 View-Inspection/ant/182ft
 View-Inspection/ant/190ft
 View-Inspection/ant/193ft
 View-Inspection/ant/194ft
 View-Inspection/ant/195ft
 View-Inspection/ant/200ft(1)
 View-Inspection/ant/200ft(2)

STRUCTURAL REVIEW

STRUCTURAL STEEL ASSESMENT

Minor = most galvanize present ~ Moderate = < 5%, no galvanize present ~ Severe = steel deterioration present

0'-20': Moderate to Severe corrosion to more than 50% of connection bolts.

0'-20': Minor to Severe corrosion to all angle braces

20'-40': Moderate to Severe corrosion to more than 50% of connection bolts.

20'-40': Minor to Severe corrosion to all angle braces

40'-80': Moderate to Severe corrosion to more than 50% of connection bolts.

40'-80': Minor to Severe corrosion to all angle braces

80'-100': Moderate to Severe corrosion to more than 50% of connection bolts.

80'-100': Minor to Severe corrosion to all angle braces

100'-120': Moderate to Severe corrosion to more than 50% of connection bolts.

100'-120': Minor to Severe corrosion to all angle braces

120'-140': Moderate to Severe corrosion to more than 50% of connection bolts.

120'-140': Minor to Severe corrosion to all angle braces

140'-160': Moderate to Severe corrosion to more than 50% of connection bolts.

140'-160': Minor to Severe corrosion to all angle braces

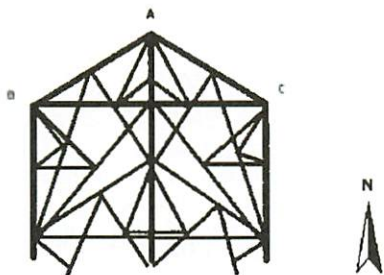
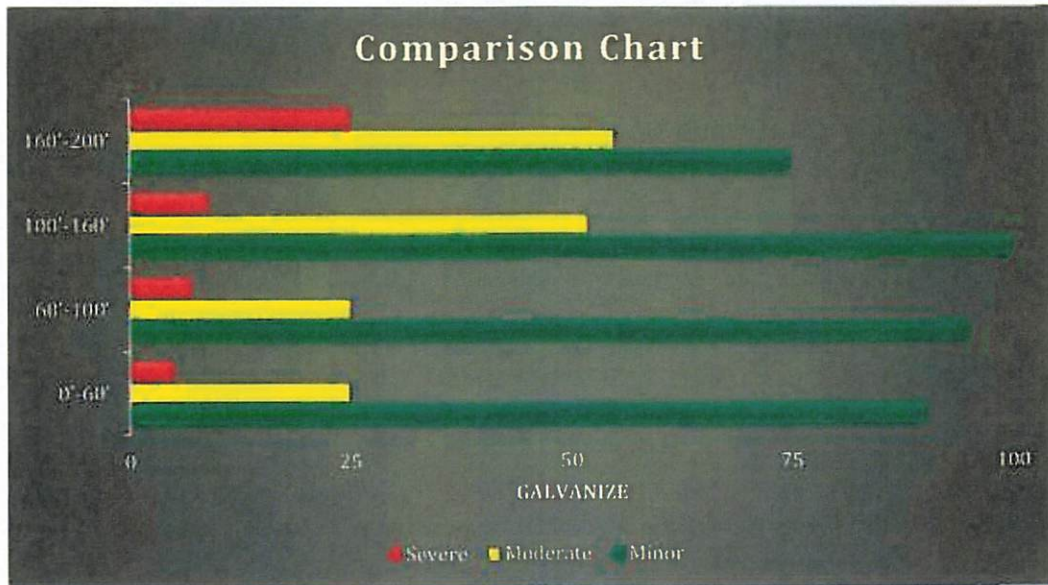
160'-180': Moderate to Severe corrosion to more than 50% of connection bolts.

160'-180': Minor to Severe corrosion to all angle braces

180'-200': Moderate to Severe corrosion to more than 50% of connection bolts.

180'-200': Minor to Severe corrosion to all angle braces

STRUCTURAL REVIEW



STRUCTURAL HIGHLIGHTS

60'

- Severe corrosion attacking Tower leg and Splice Plate. See: /ISR1

160' to 200'

STRUCTURAL REVIEW

- Tower legs A & C show signs of Moderate to Severe corrosion to the wind side faced steel. Splice plate & Connection bolts suffer the same condition. Some angle braces have been replaced and most connection bolts are in Good to Fair condition. See: /ISR2
- Angle braces, throughout structure exhibit some form of corrosion. Severe to Point of Failure condition was found on angle braces and antenna mounts. No angle braces were found to be missing or broken. See/ISR3
- There are currently 24 antennas using 38 runs of transmission cable between 160ft and 200ft.
- There are currently 9 antennas using 8 runs of transmission cable between 120ft and 160ft.
- There are currently 13 antennas and other using 16 runs of transmission from 60ft to 120ft.
- Tower paint is in Poor condition. Cracked paint along joints suggests tower movement under Typhoon conditions. See: /ISR4
- The Medium Intensity Dual Obstruction tower light was found operational. Under "FAA Medium Intensity Dual Lighting Standards (FAA Style E)", tower requires mid-level obstruction lighting.

LADDERS

Ladders

CLIMBING LADDER

- Climbing ladder is complete to 200ft. see: /ISR5
- All climbing ladder is secured and in Fair condition.
- Safety climb cable is secured and in Fair condition.

COAX LADDER

EMO Coax ladder is complete to 190ft.

- Ladder has Moderate to Severe corrosion
- Coax missing supports or not supported properly. See: /ISR6

IT&E Coax ladder is complete to 180'

- 9 coax secured to ladder
- 10- 7/8" coax supported using angle adapter and stackable blocks

Docomo

- 18 coax secured with angle adapter and stackable blocks
- Missing supports @ 160ft. See: coax ladder/docomo

RECOMMENDATIONS

Recommendations

STATEMENT OF TOWER CONDITION

- Tower condition is Poor
 - Replace all items; Corrosion Severe
 - Repaint tower; All

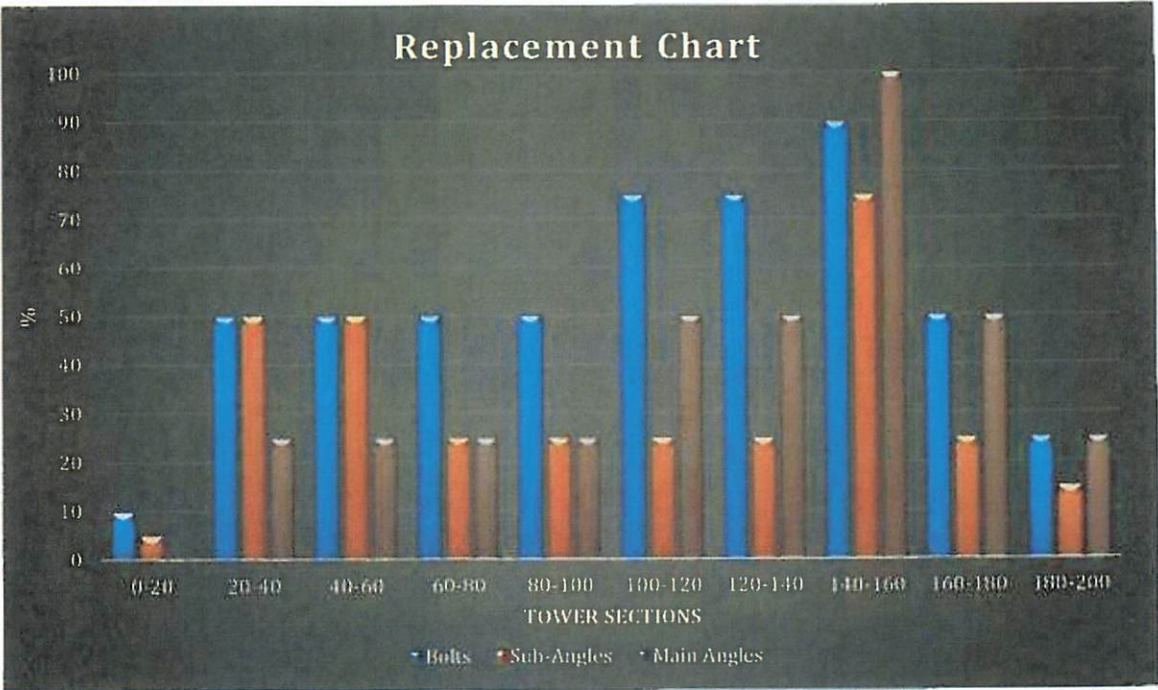


Table 1 Based on 5% loss of Galvanize

- Climbing Ladder condition is Fair
 - Replace items; Corrosion severe
 - Repair items; Corrosion Minor
- Coax Ladder condition is Poor

RECOMMENDATIONS

- Replace EMO coax ladder to 200ft.
- Replace IT&E ladder to tower attachments; Corrosion Severe
- Re-attach all angle adapters with stackable blocks to tower members

NOTES TO RECOMMENDATIONS

Notes to Recommendations

STRUCTURAL

Corrosion and condition of tower paint present difficulty in repairs. Severely corroded connection bolts need to be removed using hammer and chisel. Due to heavy coating of epoxy paint the remaining bolts require thread cleaning or heavy duty impact wrench for removal. All angle braces needing repaired should be removed and cleaned of all corrosion. Besides corrosion, most tower steel is covered with a moss like substance. See: /ISR7. Before painting can be done all contaminants need to be removed.

GOING CONCERN

Galvanize is applied around 85 micrometers thick (ASTM). Under normal conditions most galvanize will deteriorate at a rate of .03 mil per year which would result in a 75 year protective coating (American Galvanizers, 2010). As seen in undisputable proof, galvanize will deteriorate at an accelerated rate in the given environment. Furthermore, special maintenance must be performed to extend the service life of the structure.

CONTINGENT LIABILITIES

This tower has multiple tenants which are equally important to island communication. Since bare steel will deteriorate at a much faster rate, all unprotected steel should be maintained to prevent failure. All tenants of the tower should be responsible for maintenance of their installations. Inspection will show mountings that are the point of failure. Falling objects have the potential to strike another tenants installation and cause serious and expensive damage.

TAKEAWAYS

This report should help in consideration of new maintenance procedures, service life of tower, and future antenna loading.

DISCLAIMER

Disclaimer

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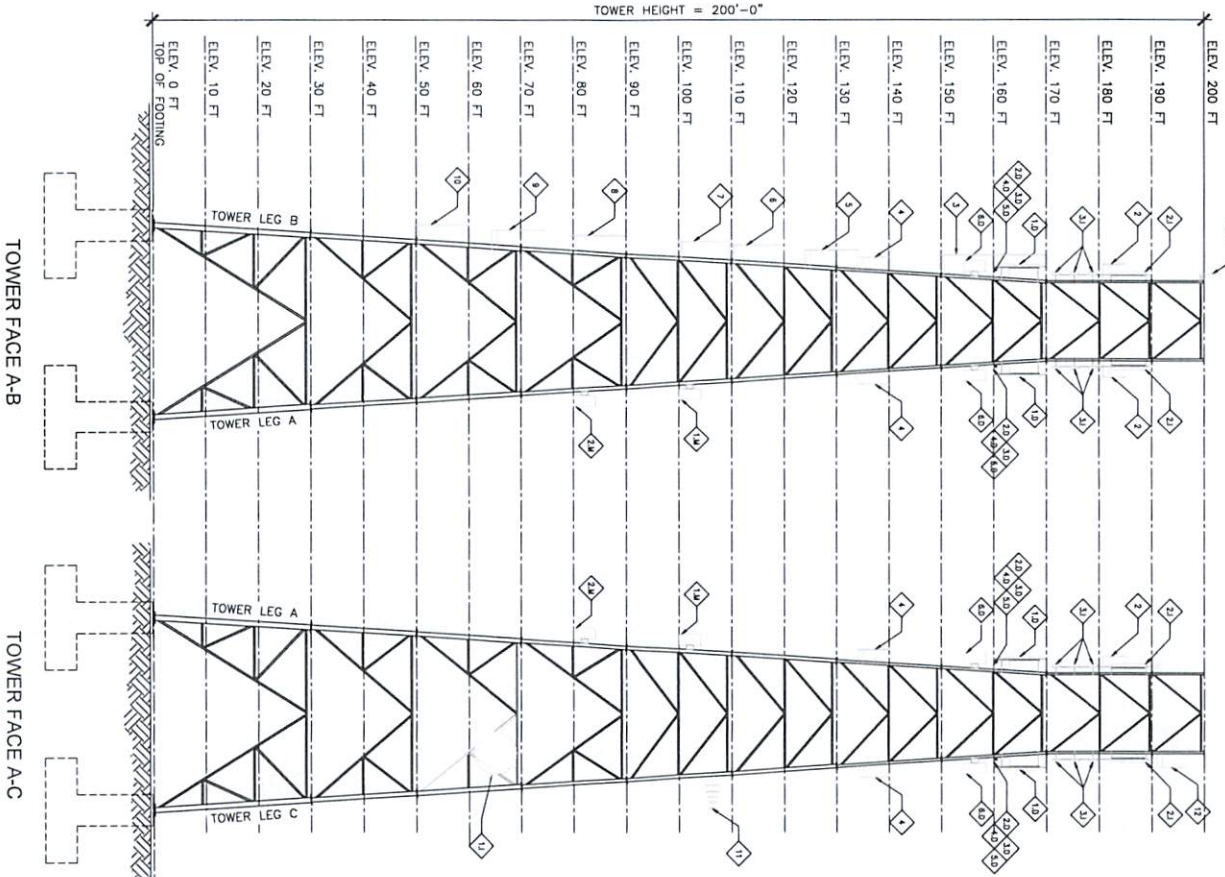
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Fax [Fax]
[Website]

TOWER HEIGHT = 200'-0"



APPROPRIANCE INFORMATION						
MARK	ELEVATION	QUANT	APPROPRIANCE [DETAILS]	MARK LOCATION	MARKING	MARKING
1	TOP	1	4 FT. COULUMIN DOW ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG B	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
2	180 FT	1	4 FT. COULUMIN DOW ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG B	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
3	150 FT	1	25 FT. ANCHOR DOW ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG B	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
4	125 FT	1	10 FT. SPREAD ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG B	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
5	100 FT	1	10 FT. SPREAD ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG B	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
6	80 FT	1	10 FT. SPREAD ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG B	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
7	60 FT	1	10 FT. SPREAD ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG B	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
8	40 FT	1	10 FT. SPREAD ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG B	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
9	20 FT	1	10 FT. SPREAD ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG B	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
10	0 FT	1	10 FT. SPREAD ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG B	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
11	180 FT	1	8 FT. ANCHOR ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG A	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
12	150 FT	1	8 FT. ANCHOR ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG A	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
13	125 FT	1	8 FT. ANCHOR ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG A	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
14	100 FT	1	8 FT. ANCHOR ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG A	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
15	80 FT	1	8 FT. ANCHOR ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG A	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
16	60 FT	1	8 FT. ANCHOR ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG A	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
17	40 FT	1	8 FT. ANCHOR ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG A	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
18	20 FT	1	8 FT. ANCHOR ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG A	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
19	0 FT	1	8 FT. ANCHOR ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG A	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
20	180 FT	1	8 FT. ANCHOR ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG C	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
21	150 FT	1	8 FT. ANCHOR ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG C	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
22	125 FT	1	8 FT. ANCHOR ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG C	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
23	100 FT	1	8 FT. ANCHOR ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG C	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
24	80 FT	1	8 FT. ANCHOR ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG C	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
25	60 FT	1	8 FT. ANCHOR ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG C	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
26	40 FT	1	8 FT. ANCHOR ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG C	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
27	20 FT	1	8 FT. ANCHOR ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG C	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY
28	0 FT	1	8 FT. ANCHOR ANTIWIND [2x4x8 DOW ANTIWIND / DOCKLATCH 113]	TOWER LEG C	(1) 2'-2 1/2"	SS1, SOIN TOWER ACCESSORY

DRAWING SCALE IS BASED ON 1/4" = 1'-0" PAPER SIZE

S-1

TOWER ELEVATIONS
APPROPRIANCE INFORMATION

DATE: 06/20/2023
PROJECT: TOWER REPLACEMENT PROJECT
SHEET NO: 009

HOME AND SECURITY AND EMERGENCY COMMUNICATIONS CENTER TOWER REPLACEMENT PROJECT

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