COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS
NORTHERN MARIANAS HOUSING CORPORATION

PUBLIC NOTICE

This Notice is paid by NMHC with HUD funds.

NOTICE OF FINDING OF NO SIGNIFICANT IMPACT
AND NOTICE OF INTENT TO REQUEST A RELEASE OF FUNDS
11/18/2026

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

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

REQUEST FOR RELEASE OF FUNDS

On or after December 04, 2026, 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
Rota Sinapalo Road and Drainage Improvement Project- Department of Public Works (DPW)	Road and Drainage Improvement Project	Sinapalo, Rota, CNMI	Approximately $515,907.00

FINDING OF NO SIGNIFICANT IMPACT

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

PUBLIC COMMENTS

Any individual, group or agency disagreeing with this determination or wishing to comment on the project may submit written comments to the Northern Marianas Housing Corporation. You may submit comments from the following options: Via mail to P.O. Box 500514, Saipan, MP 96950; Direct delivery to the central office in Garapan, Saipan or drop-box located in front of the building; and via email at nmhc@nmhcgov.net. All comments received by **December 03, 2026, 4:30 p.m.,** will be considered by the Government of the Commonwealth of the Northern Mariana Islands prior to authorizing submission of a request for release of funds. Commentors should specify which part of this Notice they are addressing.

RELEASE OF FUNDS

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

OBJECTION TO RELEASE OF FUNDS

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

/s/
David M. Apatang
Governor, CNMI

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

espanol.hud.gov

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

Project Information

Project Name: Rota Sinapalo Road and Drainage Improvement Project

Responsible Entity: Northern Marianas Housing Corporation (NMHC)

Grant Recipient (if different than Responsible Entity):

State/Local Identifier: 854856277

Preparer: Wilfred Villagomez, Project Supervisor
NMHC Community Development Block Grant - Disaster Recovery

Certifying Officer Name and Title: David M. Apatang, Governor
Commonwealth of the Northern Mariana Islands

Grant Recipient (if different than Responsible Entity): Department of Public Works

Consultant (if applicable): None

Direct Comments to: Zenie P. Mafnas, Corporate Director
Northern Marianas Housing Corporation, P.O. Box 500514, Saipan, MP 96950; Email: nmhc@nmhc.gov.mp; Fax: (670)234-9021

Project Location:
Sinapalo Road, Rota MP 96951

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]**:**
The Department of Public Works proposes to pave the road leading to the Sinapalo Elementary School Entrance. The students from around Sinapalo Village mostly walk to school. There is no walkway or designated safety path for the students to walk to school but through the existing dirt road along with the vehicle dropping students off. The road is prone to continued dust blowing during the dry season and pot holes during the rainy season.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:
The Sinapalo Road and Drainage Improvement Project will ensure safety of the students walking to and from school. This will also divert potential flooding issues from building up on the road. The road paving will assist the motorist on safety driving through designated right of way within the paved markings. This is currently not available on the existing dirt road. The road repairs and maintenance costs year-round expenditures for the Mayor's Office of Rota. This serves the community who are in the Low to Moderate Income (LMI) households.

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

There is no other entrance to the school and no available designated walk-way but the current dirt road. If this proposed road project does not proceed, the maintenance cost will continue and the safety of the students walking to school would be a continuing safety hazard.

Funding Information

Grant Number	HUD Program	Funding Amount
B-19-DV-69-0001 & B-19-DV-69-0002	Community Development Block Grant- Disaster Recovery (CDBG-DR)	$515,907.00

Estimated Total HUD Funded Amount: Approximately $515,907.00

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: Approximately $515,907.00

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 ☒	The CNMI Commonwealth Ports Authority has determined the project site is free from the runway clear zones. See Appendix A on Letter dated July 17, 2024 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 ☒	This regulation does not apply to the project area; therefore, the project is in compliance. See Appendix B on Letter dated August 2, 2024, Map of Location and Coastal Barrier Resources (CEST and EA) Worksheet. *Contractors shall apply the necessary permits prior to any construction work*
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes ☐ No ☒	The project does not require and can't obtain flood insurance for infrastructure project. There are no Flood Insurance for Public Infrastructures. See Appendix C on Letter dated November 15, 2024, 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 ☒	The CNMI Bureau of Environmental and Coastal Quality (BECQ) has 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 August 22, 2024 and Air Quality (CEST and EA) Worksheet. *Prior to construction the contractor is required to obtain permits from the BECQ*
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes ☐ No ☒	The 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 August 2, 2024, 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 ☒	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 August 22, 2024, 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 ☒	The CNMI Division of Fish and Wildlife (DFW) has determined that they do not anticipate impacts on T&E species. See Appendix E on Letter dated July 19, 2024 and Endangered Species Act (CEST and EA) Worksheet.
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes ☐ No ☒	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 August 22, 2024 and Explosive and Flammable Hazards (CEST and EA) Worksheet.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes ☐ No ☒	The Natural Resources Conservation Service (NRCS) has determined that NO protected farmlands will be impacted. See Appendix F on AD-1006, Map of Location and Farmlands Protection (CEST and EA) Worksheet.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes ☐ No ☒	The CNMI Department of Public Works has determined that the project is not located in the special flood hazard area. See Appendix C on Letter dated November 15, 2024 and Map of Location from FEMA's

		National Flood Hazard Layer and Floodplain Management (CEST and EA) Worksheet.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes ☐ No ☒	There are no significant ground disturbance activities for this project so no tribal consultation was required. The CNMI Historic Preservation Office (HPO) determines that the historic properties can be found adjacent and not within the subject projects are of potential effect (APE). Should there be inadvertent findings during construction, all earthmoving activities will stop and HPO will be notified. See Appendix H on Letter dated October 21, 2024 and Historic Preservation (CEST and EA) Worksheet.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes ☐ No ☒	The 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. See Appendix D on Letter dated August 22, 2024 and Noise (EA Level Reviews) Worksheet. *Contractors shall obtain the necessary permits prior to any construction activities*
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424€; 40 CFR Part 149	Yes ☐ No ☒	The CNMI has no Sole Source Aquifers. See Appendix J on Map for Sole Source Aquifers and Sole Source Aquifers (CEST and EA) Worksheet.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes ☐ No ☒	The project is not located in a wetland. The CNMI Bureau of Environmental and Coastal Quality (BECQ) had determined that the project site does not involve new construction within or adjacent to wetlands, marshes, we meadows, mud flats or natural ponds per field observation and maps issued by the USDI 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 ☒	There are no wild or scenic rivers located in the CNMI. See Appendix I on Wild and Scenic Rivers (CEST and EA) and Map of Location from National Rivers Inventory.
ENVIRONMENTAL JUSTICE		

Environmental Justice Executive Order 12898	Yes ☐ No ☒	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.

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 will consist of road resurfacing and installation of drainage system to ensure proper flow of runoff water to prevent flooding at the project site.
Hazards and Nuisances including Site Safety and Noise	2	The proposed project would involve resurfacing of the existing road and installation of drainage system to prevent flooding during the raining season. Contractors obtaining a permit must adhere to the permitting requirements such as construction safety and noise.
Energy Consumption	2	The construction activity may require little to no use of energy besides equipment that requires the use of fossil fuels and electrical generator.

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	2	No Adverse impact are anticipated from the project on employment and income within the project area.
Demographic Character Changes, Displacement	2	There are no character changes or displacement for this project. The project will mitigate the flooding issue at the project site.

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	There is no adverse impact on educational and cultural facilities.
Commercial Facilities	2	There is no adverse impact on commercial facilities.
Health Care and Social Services	2	There is no adverse impact on Health Care and Social Services facilities.
Solid Waste Disposal / Recycling	2	There is no adverse impact on Solid Waste Disposal and Recycling facilities.
Waste Water / Sanitary Sewers	2	There is no adverse impact on Waste Water and Sanitary Sewer facilities.
Water Supply	2	There is no adverse impact on Water Supply facilities.
Public Safety - Police, Fire and Emergency Medical	2	There is no adverse impact on Public Safety Services.
Parks, Open Space and Recreation	2	There is no adverse impact on Parks, Open Space and Recreation facilities.
Transportation and Accessibility	2	There is no adverse impact on Transportation and Accessibility services.

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features,	2	There is no adverse impact on the Unique Natural Features and Water Resources.

Water Resources		
Vegetation, Wildlife	2	There is no adverse impact on Vegetation and Wildlife.
Other Factors	2	State laws and regulations requires all construction activities to go through a permit process.

Additional Studies Performed:

None

Field Inspection (Date and completed by): November 20, 2024 by Wilfred C. Villagomez

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

1. CNMI Commonwealth Ports Authority (CPA)
2. CNMI Division of Coastal Resources Management (DCRM)
3. CNMI Bureau of Environmental and Coastal Quality (BECQ)
4. CNMI Division of Fish and Wildlife (DFW)
5. CNMI Department of Public Works (DPW)
6. CNMI Historic Preservation Office (HPO)
7. USDA Soil Conservation Service
8. CNMI Zoning Office
9. Region 9 Documentation from the Natural Park Service for Scenic Rivers in the CNMI
10. FEMA Flood Plain Maps

List of Permits Obtained:

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

Public Outreach [24 CFR 50.23 & 58.43]:

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

Cumulative Impact Analysis [24 CFR 58.32]:

Per consultation with all environmental permitting agencies there will be no adverse impact in the environment as the construction activities are minimal. The state laws and regulations 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]

None:

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

The NMHC considers not accepting a no action alternative because the proposed project is in the main entrance of Sinapalo Elementary School and cannot be relocated to another site. Relocating the roadway is not feasible. Therefore, NMHC determines there are no practicable access to the school available. The proposed action must remain at its current site.

Summary of Findings and Conclusions:

The NMHC believes that the current project will improve and enhance the access for the community. Therefore, the project shall commence to provide easy access to the adjacent properties for the residents and commercial establishments.

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

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure
N/A	N/A

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.

Prepared By:

_____ Date: 11/02/26
Wilfred C. Villagomez, CDBG-DR Project Supervisor, NMHC

Concurred By:

_____ Date: 11/10/2026
Jesse S. Palacios, Corporate Director (Acting)
Northern Marianas Housing Corporation

Certifying Officer:

_____ Date: 11/12/26
David M. Apatang, Governor
Commonwealth of the Northern Mariana Islands

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).

Sinapalo Road and Drainage Improvement Project

APPENDIX SUMMARY LISTING

Appendix A: Airport Hazards

Appendix B: Coastal Barrier Resources

Coastal Zone Management

Appendix C: Flood Insurance

Flood Plain Management

Appendix D: Clean Air

Contaminated and Toxic

Explosive and Flammable Hazards

Noise Abatement and Control

Wetlands

Appendix E: Endangered Species

Appendix F: Farmlands Protection

Appendix G: Sole Source Aquifers

Appendix H: Wild and Scenic Rivers

Appendix I: National Historic Preservation Act of 1966, particularly sections 106, and 110;36 CFR Part 800

Appendix J: Zoning

APPENDIX A

Sinapalo Road Project

Airport Hazards

Commonwealth Ports Authority

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

July 17, 2024

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

Subject: Request for Determination of Effect
Sinapalo Road and Drainage Improvement Project
Rota

Dear Mr. Arriola:

This is in reference to your letter dated July 15, 2024 requesting for a determination of effect for the Sinapalo Road and Drainage Improvement Project, located GPS Latitude/Longitude: 14.162276, 145.241923 on Sinapalo Village, Rota.

After review of the lot and its location, we determined that the aforementioned lot 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,

LEO B. TUDELA
Executive Director

cc: ELCO

NMHC- SAIPAN OFFICE
RECEIVED
Time: 11:11am
Date: 7/23/24

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 15, 2024

Mr. Leo Tudela
Executive Director
Commonwealth Ports Authority
P.O. Box 501055
Saipan, MP 96950

Re: Request for a Determination of Effect Rota Mayor's Office' Sinapalo road and drainage Improvement Project

Dear Mr. Tudela,

The Northern Marianas Housing Corporation (NMHC) is in the process of preparing the Environmental Assessment Statutory Checklist (24 CFR § 58.35) for the Rota Mayor's Office, Sinapalo road and drainage Improvement Project, located in Sinapalo Village, Rota, GPS Latitude/Longitude: 14.162276, 145.241923.

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 your office to issue a Determination of Effect based on HUD requirement on Airport Clear Zones and Accident Potential Zones 24 CFR 51d for the location mentioned above.

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

Project Maps

A map (or maps) that delineate(s) the following items for each target area must be included in the application package:

1. Existing Conditions Map: Provide a detailed map of the existing improvements. The map should delineate such items as the location of project and/or size of waterlines, elevated water tanks, sewer lines, manholes, location of treatment plants, etc.

2. Proposed Improvements Map: Provide a detailed map showing the location of project, sizes, etc. of the proposed improvements.

3. Census tracts and/or block groups (by number) and/or logical records numbers.
4. Location of concentrations of low- and moderate-income persons, showing numbers and percent by census tracts and/or block groups and/or logical record number.

5. Boundaries of areas in which the activities will be concentrated; and

6. The specific location of each activity.

Note: *The Existing Conditions map and the Proposed Improvements map may be combined into one map if all the information shown can be depicted in such a way as to easily determine the difference between the existing and proposed.*





SINAPALO ROAD TO ELEMENTARY SCHOOL

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

PROJECT: SINAPALO ELEMENTARY ROAD IMPROVEMENT PROJECT

LOCATION: SINAPALO, SAIPAN

LENGTH: 700 Linear Feet

WIDTH: 20 Feet Wide (proposed pavement)

SCOPE OF WORK

BRIEF DESCRIPTION:

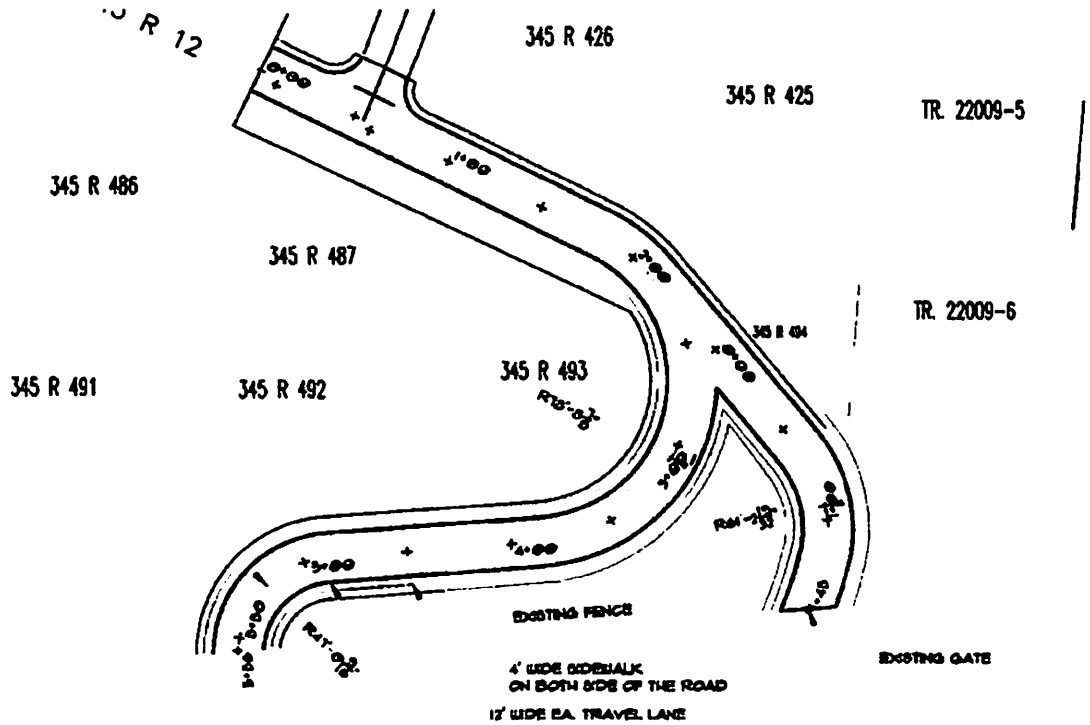
The proposed road is approximately 700 feet from the existing road to the entrance (Gate) of the Sinapalo Elementary School. The existing road is about 30 feet wide composed of compacted coral basecourse and no drainage system in place.

The proposed road project includes, construction survey and staking, to identify the boundary of the right of way. The roadway excavation is limited 6" depth, and application of 6" thick basecourse materials approximately 2000 square yard, application of eight inch (8") thick concrete pavement approximately 78 square yard, permanent traffic signs and pavement markings, and 4' wide concrete sidewalk.

The installation of traffic control plans and erosion control measures is vital for the safety of the traffic and of the community.

Prepared by:

Isagani C. Salazar
DPW Highway Engineer



SINAPALO ELEMENTARY SCHOOL

ROAD PLAN

1 / C-1 NOT TO SCALE

COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS
SAIPAN
DEPARTMENT OF PUBLIC WORKS
TECHNICAL SERVICES DIVISION

PROJECT TITLE: ISLAND: SAIPAN
SINAPALO ELEMENTARY SCHOOL
ROAD IMPROVEMENT

CONTENTS:
ROAD LAYOUT

ANTHONY A. CAMACHO
RAY N. YAMA

SCALE: AS SHOWN
SHEET NO. C-1

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 15, 2024

COPY

7.16.24
BY: AJPL

Mr. Leo Tudela
Executive Director
Commonwealth Ports Authority
P.O. Box 501055
Saipan, MP 96950

Re: Request for a Determination of Effect Rota Mayor's Office' Sinapalo road and drainage Improvement Project

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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 your office to issue a Determination of Effect based on HUD requirement on Airport Clear Zones and Accident Potential Zones 24 CFR 51d for the location mentioned above.

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

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 Sinapalo Road and Drainage Improvement Project is located in Sinapalo Village, Rota. The CNMI Commonwealth Ports Authority has determined that the project is free from the Airport Runway Clear Zones.

Are formal compliance steps or mitigation required?

☐ Yes

☒ No

Google Maps

Sinapalo Road and Drainage Improvement Project



Imagery ©2025 Data NOAA, CNES / Airbus, Airbus, Data SIO, NOAA, U.S. Navy, NGA, GEBCO, Data LDEO-Columbia, NSF, NOAA, Imagery ©2025 Airbus, CNES / Airbus, Landsat / Copernicus, Maxar Technologies, Map data ©2025 Google 1 mi

Measure distance
Total distance: 4,237.05 ft (1.29 km)

Google Maps

Liyu, Rota 96951, CNMI to Liyu, Rota 96951, CNMI

Rota Liyo Road and Drainage Improvement Project

Drive 36 m, 1 min



Imagery ©2025 Airbus, Imagery ©2025 Airbus, CNES / Airbus, Maxar Technologies, Map data ©2025 200 ft

via unnamed roads Fastest route	1 min 36 m

Explore Liyu

Restaurants | Hotels | Gas stations | Parking Lots | More

Google Maps

Liyu, Rota 96951, CNMI to Liyu, Rota 96951, CNMI

Rota Liyo Road and Drainage Improvement Project

Drive 36 m, 1 min



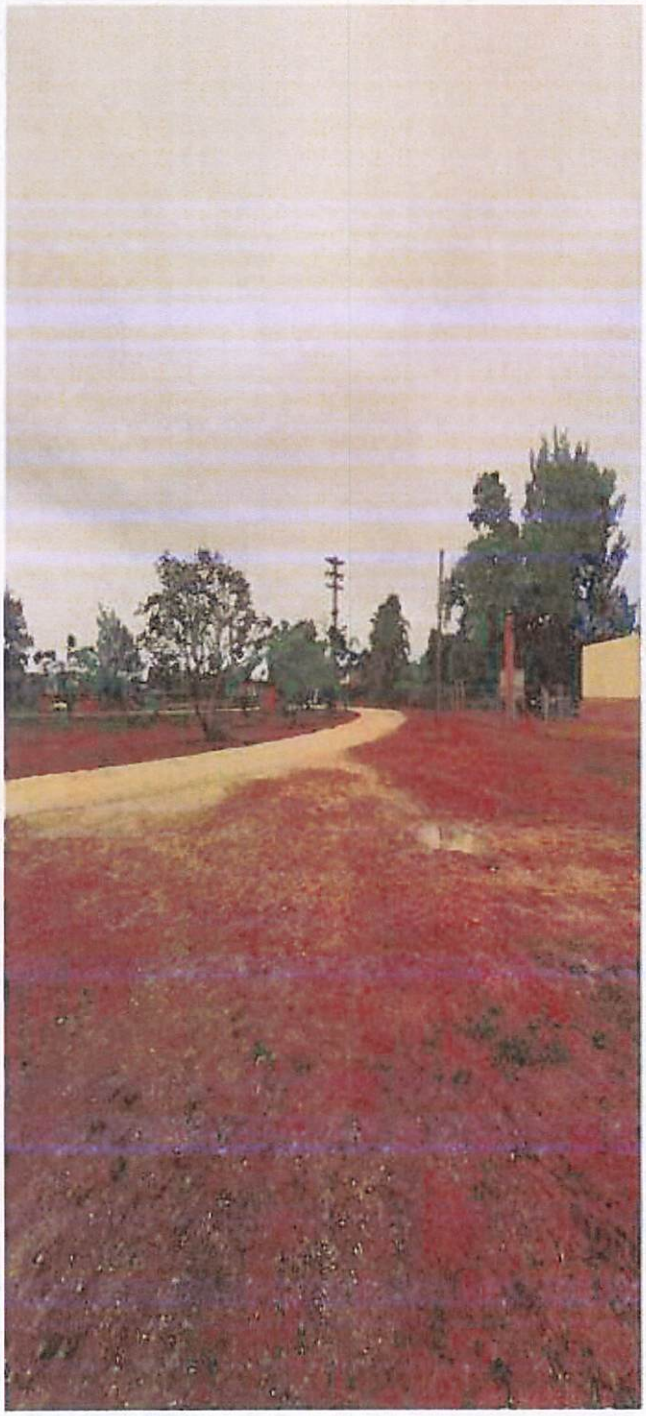
Imagery ©2025 Data NOAA, CNES / Airbus, Airbus, Data SIO, NOAA, U.S. Navy, NGA, GEBCO, Data LDEO-Columbia, NSF, NOAA, Map data ©2025 , Map data ©2025 Google 1 mi

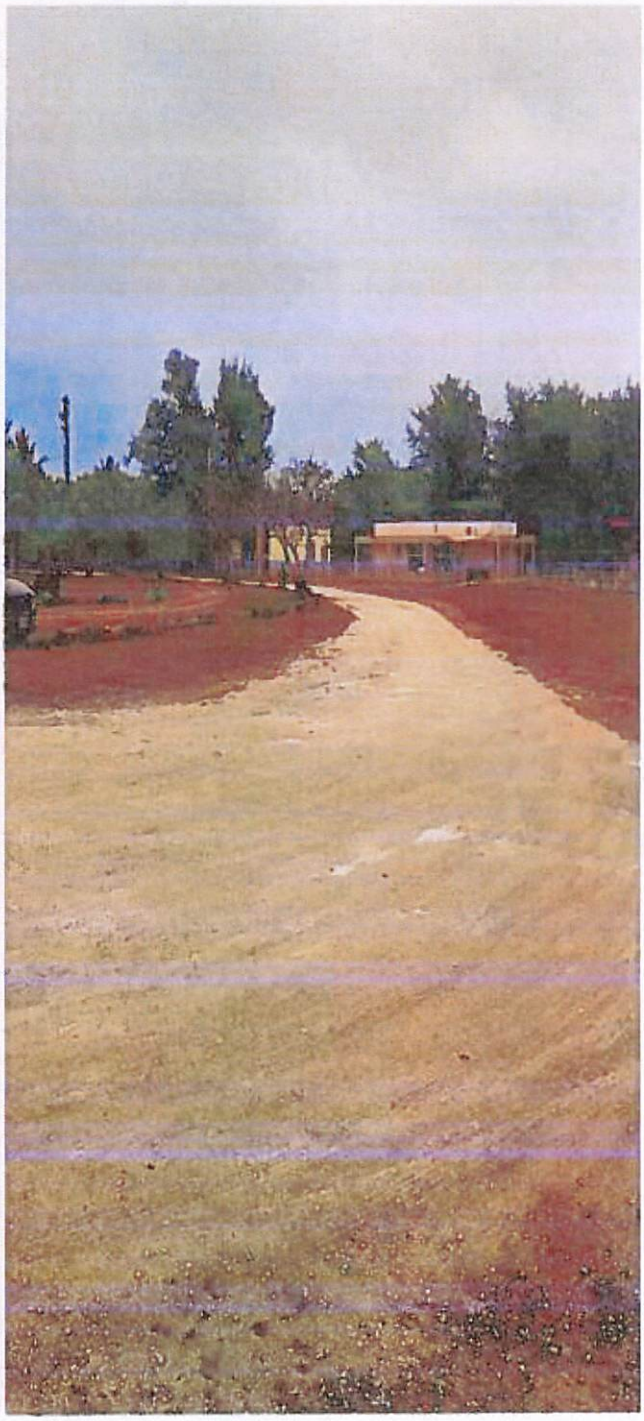
via unnamed roads		1 min
Fastest route		36 m

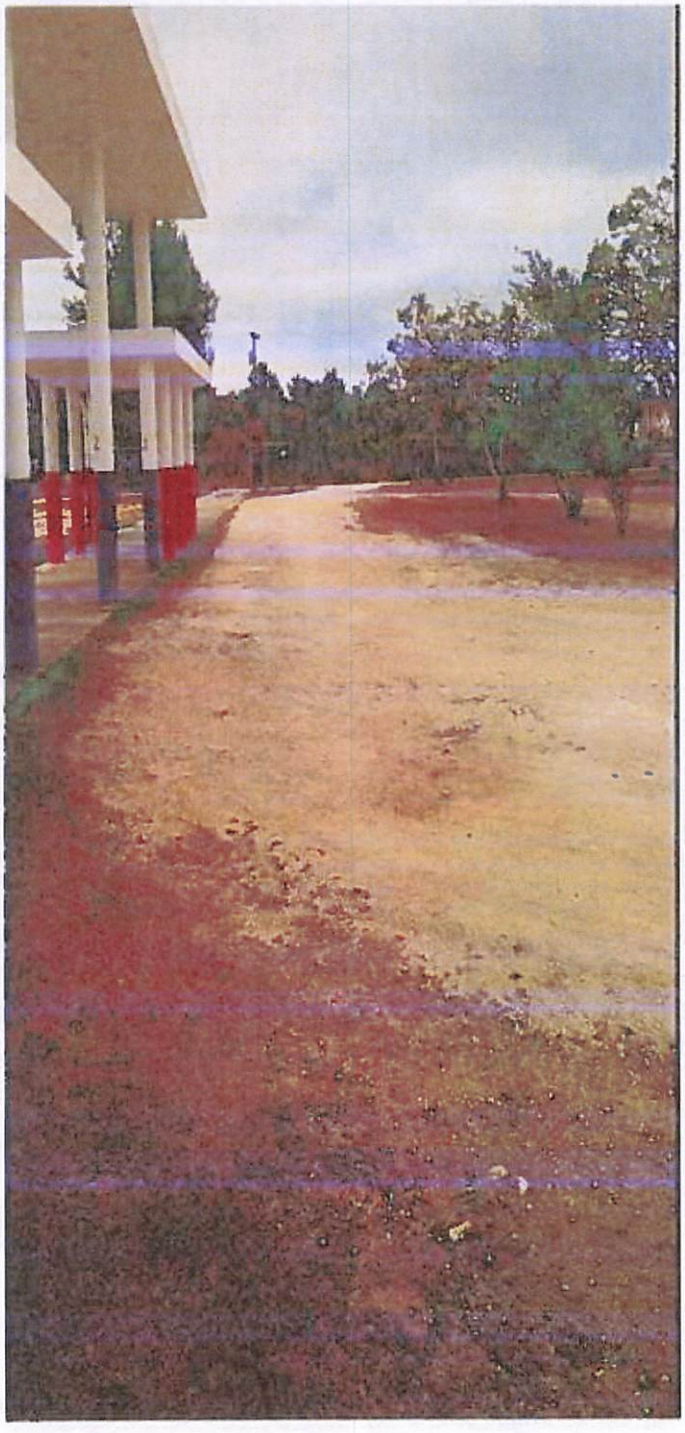
Explore Liyu

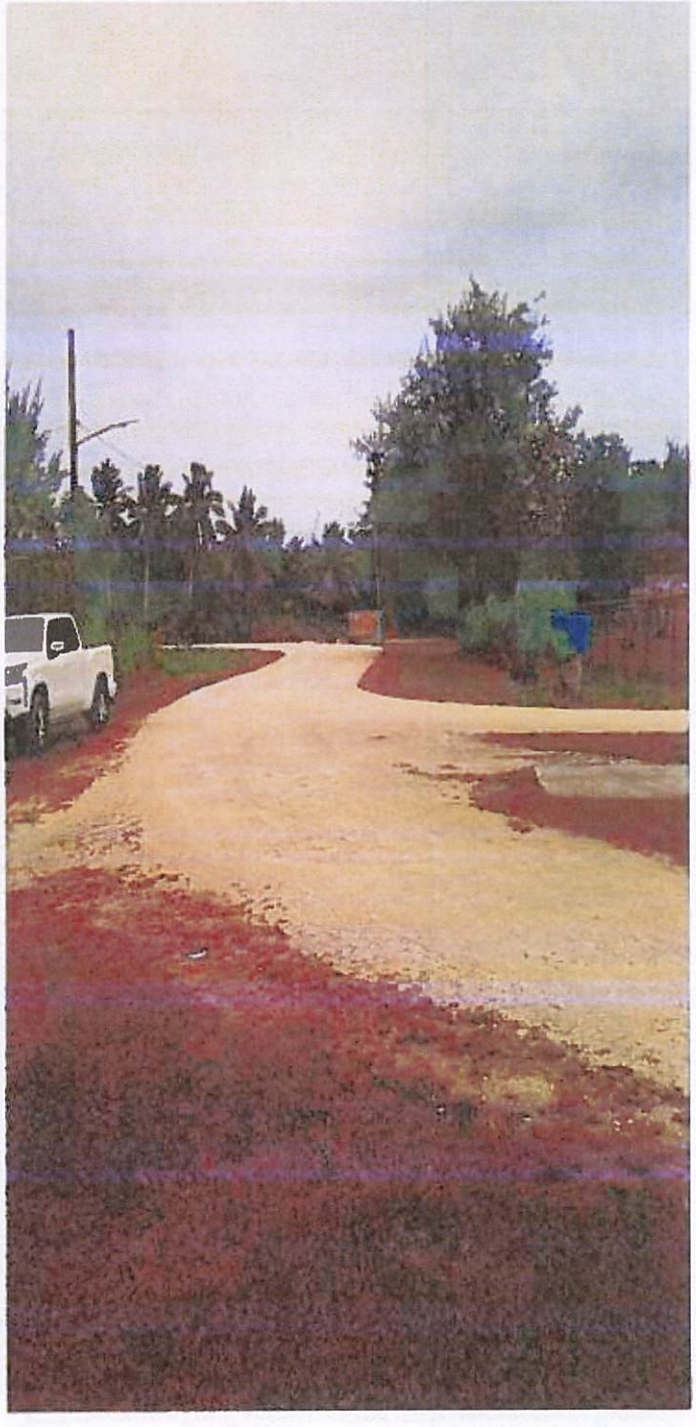
Restaurants Hotels Gas stations Parking Lots More

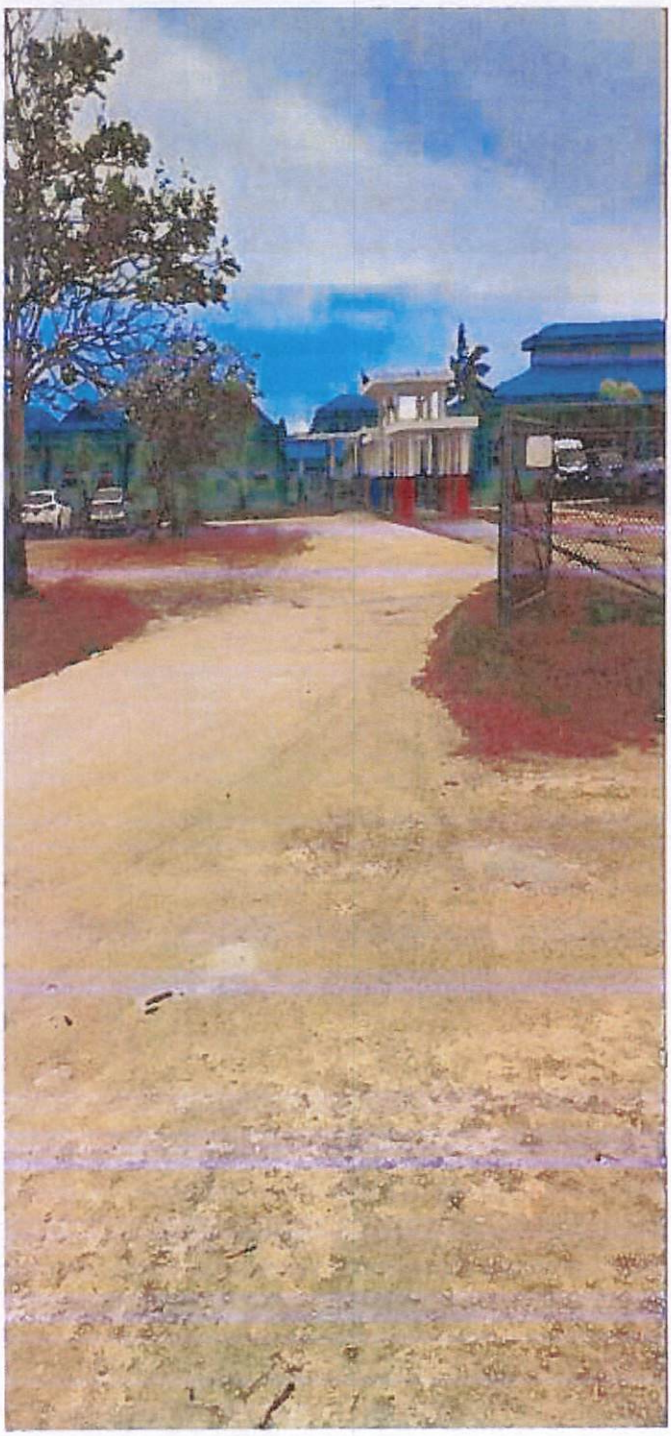
Sinapalo Road and Drainage Improvement Project

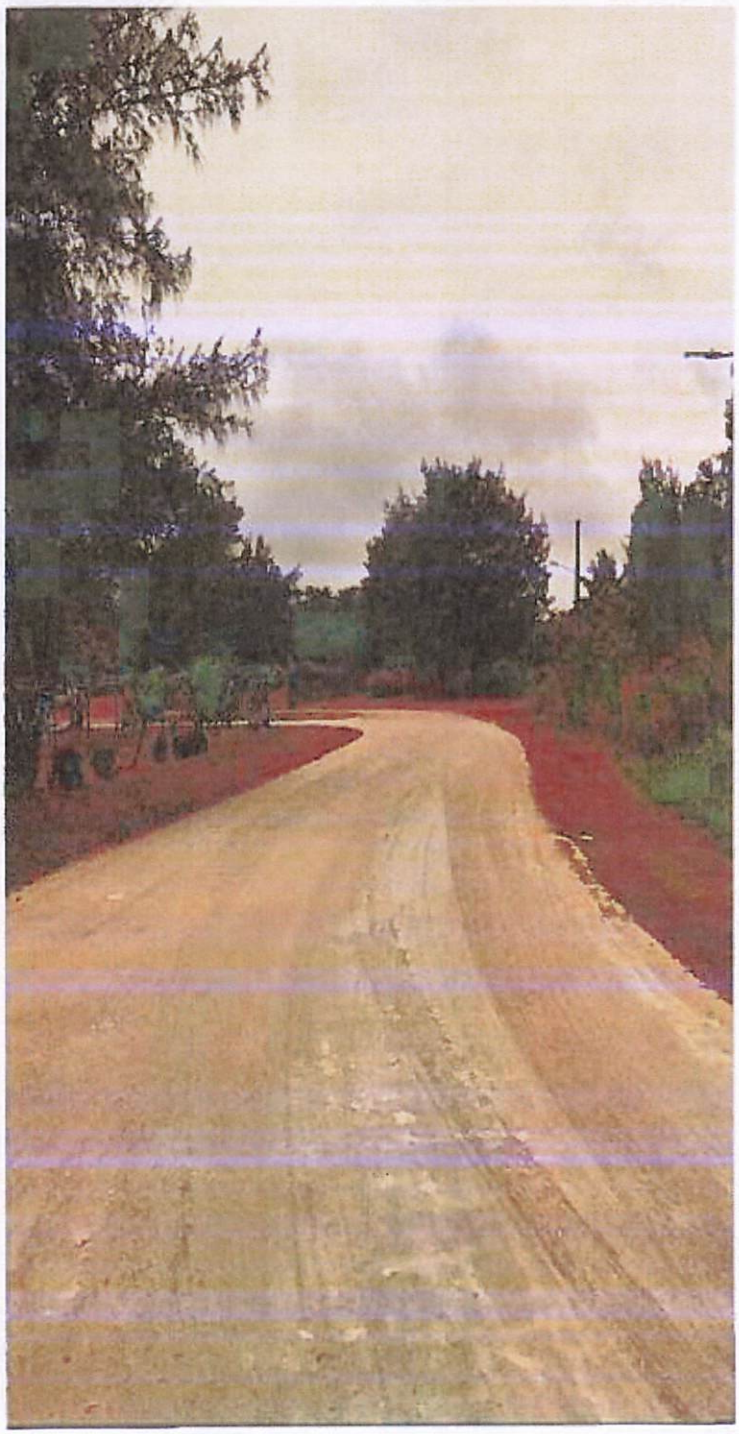












APPENDIX B

Sinapalo Road Project

Coastal Barrier Resources

Coastal Zone Management

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

Eli D. Cabrera
Administrator

Richard V. Salas
Director, DCRM

August 2, 2024

Ref No: PRM24-269/307D-24-052

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

RE: DCRM Determination of Effect– Sinapalo Road and Drainage Improvement

Dear Mr. Arriola,

The Division of Coastal Resources Management (DCRM) is in receipt of your letter dated July 15, 2024 requesting for our concurrence for the proposed above-subject project on Rota. As stated in your letter, the Sinapalo road and drainage improvement project will require our concurrence before project commences. Moreover, this project will be funded through the Community Development Block Grant-Disaster Recovery Program (CDBG-DR Program), a federally funded program from the U.S. Department of Housing and Urban Development (U.S. HUD).

Based on the information provided, the Northern Marianas Housing Corporation (NMHC) has issued a determination of effect that the aforementioned project is - a) not located within DCRM's designated Areas of Particular Concern (APCs) with respect to the CNMI's Coastal Regulations and its State Implementation Plan (SIP); (b) not located in a state that does not contain Coastal Barrier Resources System (CBRS); (c) not likely to have any adverse effects and will not cause destruction or modifications of a wetland which therefore is in compliance with Executive Order 11990; and, (d) not located within proximity of a Wild or Scenic River.

Based on these four components, DCRM hereby concurs with NMHC's determination. This concurrence is limited to the aforementioned four components and does not certify DCRM's concurrence that there are no impacts to all coastal resources, including compliance with Executive Order 11988 – Floodplain Management, or other US HUD requirements for federal financial assistance. Moreover, to the extent that this new project 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 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, the Division of Fish and Wildlife (DFW), and the Historic Preservation Office (HPO) to review your project 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 continue coordination as NMHC plans and seeks permits for this important improvement project. Should you have any questions or need assistance, please contact our Permitting Section at (670) 664-8300 or via email at permitting@dcrm.gov.mp.

Sincerely,

RICHARD V. SALAS
Director
Division of Coastal Resources Management

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 15, 2024

COPY

Mr. Richard V. Salas
Director
Division of Coastal Resources Management
P.O. Box 10007
Saipan, MP 96950

ISION OF CRM
RECEIVED
7/16/24

Re: Request for a Determination of Effect Rota Mayor's Office, Sinapalo road and drainage Improvement Project

Dear Mr. Salas,

The Northern Marianas Housing Corporation (NMHC) is in the process of preparing the Environmental Assessment Statutory Checklist (24 CFR § 58.35) for the Rota Mayor's Office, Sinapalo road and drainage Improvement project, located in Sinapalo village, Rota, GPS Latitude/Longitude: 14.162276, 145.241923.

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 Wetland Protection Executive Order 11988, Coastal Zone Management Act Sections 307 (c) and (d) on the location mentioned above.

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 Arriola
Project Manager

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 Sinapalo Road and Drainage Improvement Project is located in Sinapalo Village, Rota. The CNMI Division of Coastal Resources Management concurs with NMHC that there are no impacts to all coastal resources and the state does not contain Coastal Barrier Resources System (CBRS).

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 Sinapalo Road and Drainage Improvement Project is located in Sinapalo Village, Rota. The CNMI Division of Coastal Resources Management concurs with NMHC that there are no impacts to all coastal resources and the state does not located within DCRM's designated Areas of Particular Concern (APC's) with respect to the CNMI's Coastal Regulations and its State Implementation Plan (SIP).

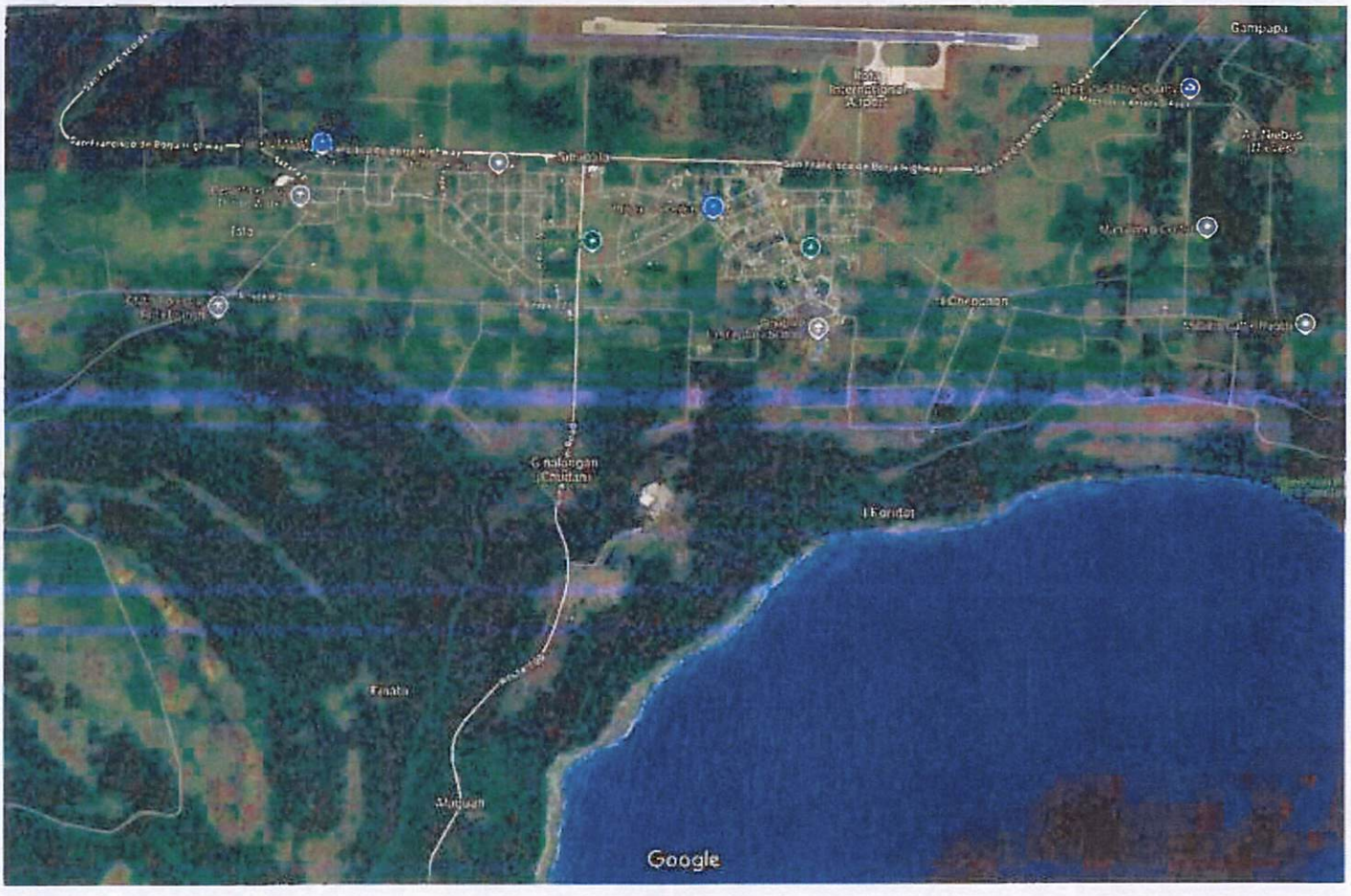
Are formal compliance steps or mitigation required?

☐ Yes

☒ No

Google Maps

Sinapalo Road and Drainage Improvement Project



Imagery ©2025 Airbus, CNES / Airbus, Data NOAA, Imagery ©2025 Airbus, CNES / Airbus, Landsat / Copernicus, Maxar Technologies, Map data ©2025 Google 1000 ft

U.S. Fish and Wildlife Service

Coastal Barrier Resources System

Rota Sinapalo Road and Drainage



April 9, 2025

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

APPENDIX C

Sinapalo Road Project

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

November 15, 2024
Serial No. PW24-0876

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

Subject: Determination of Special Flood Hazard, Rota Mayor's Office, Sinapalo Road & Drainage Improvement Project

Dear Mr. Arriola,

This is in response to your request letter dated July 15, 2024 for the determination of Special Flood Hazard Area as part of a regulatory compliance checklist for the proposed Sinapalo Road & Drainage Improvement project.

After careful review of the Flood Insurance Rate Map and other source materials, this office has determined that the aforementioned location is **OUTSIDE of the Special Flood Hazard Area.** See attached maps.

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 numbers: (670) 234-2726/2296.

Sincerely,

RAY N. YEMUL
Secretary of Public Works

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

National Flood Hazard Layer FIRMette



Basemap Imagery Source: USGS National Map 2023

Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS
- Without Base Flood Elevation (BFE) Zone A, V, A99
- With BFE or Depth Zone AE, AO, AH, VE, AR
- Regulatory Floodway

OTHER AREAS OF FLOOD HAZARD
- 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
- Future Conditions 1% Annual Chance Flood Hazard Zone X
- Area with Reduced Flood Risk due to Levee, See Notes. Zone X
- Area with Flood Risk due to Levee Zone D

OTHER AREAS
- NO SCREEN Area of Minimal Flood Hazard Zone X
- Effective LOMRs
- Area of Undetermined Flood Hazard Zone D

GENERAL STRUCTURES
- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

OTHER FEATURES
- 23.2 Cross Sections with 1% Annual Chance
- 17.5 Water Surface Elevation
- Coastal Transect
- Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature

MAP PANELS
- Digital Data Available
- No Digital Data Available
- Unmapped

N

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 8/15/2024 at 11:21 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS
Building Safety Code Division, Department of Public Works
2nd floor - Oleai Joeten Commercial Center
Saipan, MP 96950

APPLICATION FEES

TO : **CNMI, TREASURER**
FROM : **BUILDING SAFETY OFFICIAL**
SUBJECT : **BUILDING PERMIT FEES (P.L. 21-14 & P.L. 8-8)**
DEVELOPER'S TAX (P.L. 8-23)

NAME OF APPLICANT *Northern Marianas Housing Corporation*

PROJECT LOCATION *Sinapalo, Rota*

PROJECT DESCRIPTION *Rota Mayor's Office, Sinapalo Road & Drainage Improvement*

	FEES DESCRIPTION (SAIPAN - ACCOUNT)	ACCOUNT NO.	AMOUNT
1	Floodplain Permit Application Fee	DE002	
2	Floodplain Development Permit Review Fee	DE006	$ 25.00
3	Substantial Improvement/Substantial Damage Review Fee	DE005	
4	Certification of Elevation Review Fee	DE004	
5	No Rise Certification Review Fee	DE009	
6	Flood Zone (Special Flood Hazard Area) Determination Fee	DE012	
7	Floodplain Management Inspection Fee (Residential)	DE013	
8	Floodplain Management Inspection Fee (Non-residential, exceeding 5000 SQFT)	DE014	
9	Floodplain Management Inspection Fee (Non-residential, 5000 SQFT or less)	DE015	
		TOTAL:	$ 25.00

INITIAL: *Edwin Tmarsel*
For: Yvonne B. Tenorio
Acting Building Safety Official

DATE: 8/13/2024

Commonwealth of the Northern Mariana Islands (CNMI) - MP
FINANCE - SAIPAN
Treasury Capital Hill
Saipan, MP 96950
Official Cash Receipt

006126-0022 Marcy D. 11/06/2024 10:10AM

MISCELLANEOUS
BULDING PERMIT FEES
(DE002)
2025 Item: DE002
1 @ 25.00
BULDING PERMIT FEES
(DE002) 25.00

25.00

RECEIVED
Date: 11-06-24
BLDG. SFTY DIV
D.P.W.

Subtotal 25.00
Total 25.00

CHECK 25.00
Check Number41371

Change due 0.00

Paid by: NORTHERN MARIANAS HOUSING CORPORATION

Thank you for your payment

CUSTOMER COPY

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

TECHNICAL SERVICES DIVISION
DEPARTMENT OF PUBLIC WORKS
Date 7/17/24
Time 2:05pm
CNMI

RECEIVED
Date 7/16/24
Time 1:35pm
PW SECRETARY'S OFFICE
PSCD

July 15, 2024

Mr. Ray N. Yumul
Secretary
Department of Public Works
2nd Floor JCT Bldg, San Jose
Saipan, MP 96950

RE: Determination of Special Flood Hazard Area, Rota Mayor's Office, Sinapalo road and drainage Improvement project

Dear Secretary Yumul,

The Northern Marianas Housing Corporation (NMHC) is in the process of preparing the Environmental Assessment Statutory Checklist (24 CFR § 58.35) for the Rota Mayor's Office, Sinapalo road and drainage Improvement project, located in Sinapalo village, Rota, GPS Latitude/Longitude: 14.162276, 145.241923.

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

If you have any questions or concerns, please 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

Technical Services Division
SCANNED
Date 7/17 By A

Project Maps

A map (or maps) that delineate(s) the following items for each target area must be included in the application package:

1. Existing Conditions Map: Provide a detailed map of the existing improvements. The map should delineate such items as the location of project and/or size of waterlines, elevated water tanks, sewer lines, manholes, location of treatment plants, etc.

2. Proposed Improvements Map: Provide a detailed map showing the location of project, sizes, etc. of the proposed improvements.

3. Census tracts and/or block groups (by number) and/or logical records numbers.
4. Location of concentrations of low- and moderate-income persons, showing numbers and percent by census tracts and/or block groups and/or logical record number.

5. Boundaries of areas in which the activities will be concentrated; and

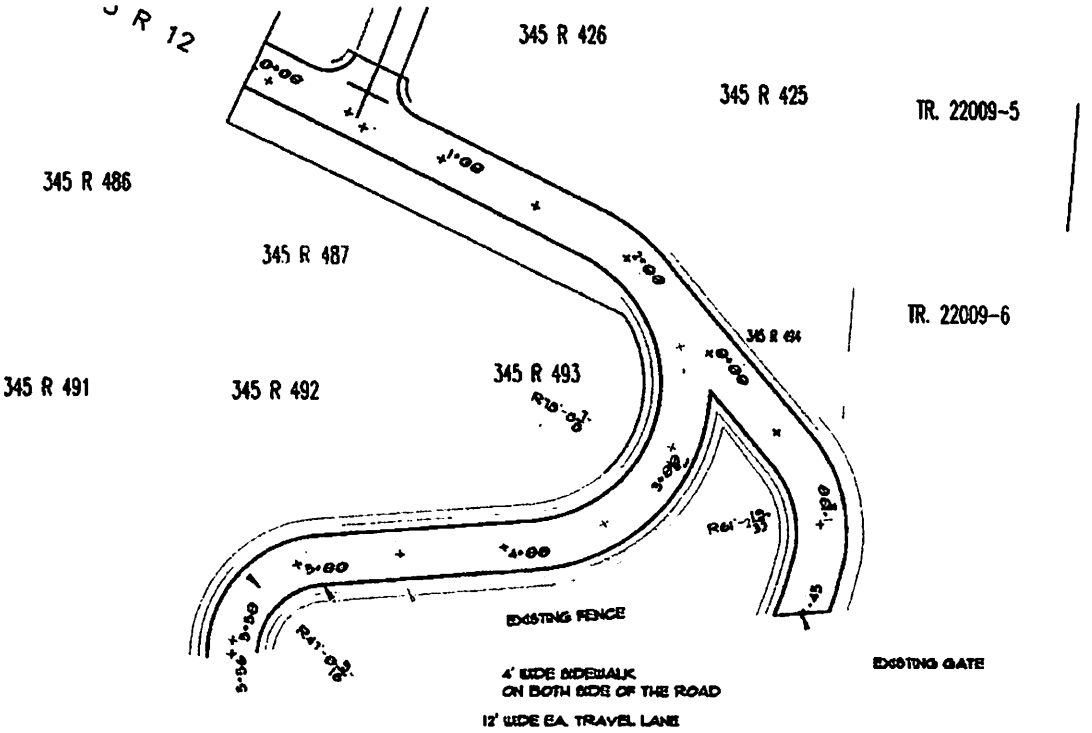
6. The specific location of each activity.

Note: *The Existing Conditions map and the Proposed Improvements map may be combined into one map if all the information shown can be depicted in such a way as to easily determine the difference between the existing and proposed.*





SINAPALO ROAD TO ELEMENTARY SCHOOL



SINAPALO ELEMENTARY SCHOOL

ROAD PLAN

1/C-1 NOT TO SCALE

NO.	DATE	DESCRIPTION	BY	APPR.

COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS
SAIPAN
DEPARTMENT OF PUBLIC WORKS — TECHNICAL SERVICES DIVISION

DSN	CTL	CHK	ICS
DRN	CTL	SPV	ICS

PROJECT TITLE: SINAPALO ELEMENTARY SCHOOL ROAD IMPROVEMENT
ISLAND: SAIPAN
CONTENT: ROAD LAYOUT

ANTHONY A. CAMACHO
RAY N. YUMUL

ZONE REVIEW: DRAWING NO. C-1
SCALE: AS SHOWN
SHEET 1 OF 1

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

DPW ASD RECEIVED DATE: 7/16/24 TIME: 1:35 OFFICE

J.T.

July 15, 2024

COPY

Mr. Ray N. Yumul
Secretary
Department of Public Works
2nd Floor JCT Bldg, San Jose
Saipan, MP 96950

RE: Determination of Special Flood Hazard Area, Rota Mayor's Office, Sinapalo road and drainage Improvement project

Dear Secretary Yumul,

The Northern Marianas Housing Corporation (NMHC) is in the process of preparing the Environmental Assessment Statutory Checklist (24 CFR § 58.35) for the Rota Mayor's Office, Sinapalo road and drainage Improvement project, located in Sinapalo village, Rota, GPS Latitude/Longitude: 14.162276, 145.241923.

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

If you have any questions or concerns, please 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

Flood Insurance (CEST and EA)

General requirements	Legislation	Regulation	Reference
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 55.5.	Flood Insurance - HUD Exchange

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

The Sinapalo Road and Drainage Improvement Project is located in Sinapalo Village, Rota.
The road project does not require and can't obtain flood insurance for Infrastructure Projects.

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 Executive Order 13690 42 USC 4001-4128 42 USC 5154a	24 CFR 55

Reference
https://www.hudexchange.info/environmental-review/floodplain-management

1. **Does this project meet an exemption at 24 CFR 55.12 from compliance with HUD's floodplain management regulations in Part 55 or utilize the delayed compliance date for certain Office of Housing programs?**
   ☒ Yes

   Select the applicable citation at 24 CFR 55.12 and provide supporting documentation for the determination if applicable.

   a) ☒ HUD-assisted activities described in 24 CFR 58.34 and 58.35(b)
   b) ☐ HUD-assisted activities described in 24 CFR 50.19, except as otherwise indicated in § 50.19
   c) ☐ The approval of financial assistance for restoring and preserving the natural and beneficial functions and values of floodplains and wetlands, including through acquisition of such floodplain and wetland property, where a permanent covenant or comparable restriction is place on the property's continued use for flood control, wetland projection, open space, or park land, but only if:
      (1) The property is cleared of all existing buildings and walled structures; and
      (2) The property is cleared of related improvements except those which:
         (i) Are directly related to flood control, wetland protection, open space, or park land (including playgrounds and recreation areas);
         (ii) Do not modify existing wetland areas or involve fill, paving, or other ground disturbance beyond minimal trails or paths; and
         (iii) Are designed to be compatible with the beneficial floodplain or wetland function of the property.
   d) ☐ An action involving a repossession, receivership, foreclosure, or similar acquisition of property to protect or enforce HUD's financial interests under previously approved loans, grants, mortgage insurance, or other HUD assistance
   e) ☐ Policy-level actions described at 24 CFR 50.16 that do not involve site-based decisions
   f) ☐ A minor amendment to a previously approved action with no additional adverse impact on or from a floodplain or wetland;

g) ☐ HUD's or the responsible entity's approval of a project site, an incidental portion of which is situated in the FFRMS floodplain (not including the floodway, LiMWA, or coastal high hazard area) but only if:

(1) The proposed project site does not include any existing or proposed buildings or improvements that modify or occupy the FFRMS floodplain except de minimis improvements such as recreation areas and trails; and

(2) the proposed project will not result in any new construction in or modifications of a wetland

h) ☐ Issuance or use of Housing Vouchers or other forms of rental subsidy where HUD, the awarding community, or the public housing agency that administers the contract awards rental subsidies that are not project-based (i.e., do not involve site-specific subsidies)

i) ☐ Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and persons with disabilities.

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

☐ Yes. Office of Housing programs utilizing the January 1, 2025 compliance date. These reviews must comply with the 2013 version of the Part 55 regulations. Continue to Worksheet Summary for 2013 version to upload supporting documentation.

☐ No. *Continue to Question 2.*

2. Does the project include a Critical Action?

☐ Yes. Describe the Critical Action. Examples of Critical Actions include projects involving hospitals, fire and police stations, nursing homes, hazardous chemical storage, storage of valuable records, and utility plants. Continue to Question 4.

☐ No. Continue to Question 3.

3. Determine the extent of the FFRMS floodplain and provide mapping documentation in support of that determination.

The extent of the FFRMS floodplain can be determined using a Climate Informed Science Approach (CISA), 0.2 percent flood approach (0.2 PFA), or freeboard value approach (FVA). For projects in areas without available CISA data or without FEMA Flood Insurance Rate Maps (FIRMs), Flood Insurance Studies (FISs) or Advisory Base Flood Elevations (ABFEs), use the best available information to determine flood elevation. Include documentation and an explanation of why this

is the best available information for the site. Note that newly constructed and substantially improved structures must be elevated to the FFRMS floodplain regardless of the approach chosen to determine the floodplain.

Select one of the following three options:

☐ CISA for non-critical actions. If using a local tool, data, or resources, ensure that the FFRMS elevation is higher than would have been determined using the 0.2 PFA or the FVA.

☐ 0.2-PFA. Where FEMA has defined the 0.2-percent-annual-chance floodplain, the FFRMS floodplain is the area that FEMA has designated as within the 0.2-percent-annual-chance floodplain.

☐ FVA. If neither CISA nor 0.2-PFA is available, for non-critical actions, the FFRMS floodplain is the area that results from adding two feet to the base flood elevation as established by the effective FIRM or FIS or—if available —a FEMA-provided preliminary or pending FIRM or FIS or advisory base flood elevations, whether regulatory or informational in nature. However, an interim or preliminary FEMA map cannot be used if it is lower than the current FIRM or FIS.

a. **Does your project occur in the FFRMS floodplain?**
☐ Yes, continue to part b.
☐ No. Review for floodplain management is complete.

b. Is your project located in any of the floodplain categories below? Select all that apply. If none **apply, continue to question 7.**

☐ Floodway: *Continue to Question 5. Floodways.*

☐ Coastal High Hazard Area (V Zone) or Limit of Moderate Wave Action (LiMWA): *Continue to Question 6. Coastal High Hazard Areas and LiMWAs.*

4. **Determine the extent of the FFRMS floodplain and provide mapping documentation in support of that determination.**
The extent of the FFRMS floodplain can be determined using a Climate Informed Science Approach (CISA), or the higher of the 0.2 percent flood approach (0.2 PFA), or freeboard value approach (FVA). For projects in areas without available CISA data or without FEMA Flood Insurance Rate Maps (FIRMs), Flood Insurance Studies (FISs) or Advisory Base Flood Elevations (ABFEs), use the best available information to determine flood elevation. Note that newly constructed and substantially improved structures must be elevated to the FFRMS floodplain regardless of the approach chosen to determine the floodplain.

Utilize CISA to determine the FFRMS floodplain for critical actions

☐ CISA for Critical Actions. If using a local tool, ensure that the FFRMS elevation provided is higher than the 0.2 PFA or 3' above the base flood elevation.

OR;

Choose the higher of 0.2 PFA or FVA elevations

☐ 0.2-PFA. Where FEMA has defined the 0.2-percent-annual-chance floodplain, the FFRMS floodplain is the area that FEMA has designated as within the 0.2-percent-annual-chance floodplain.

☐ FVA. For critical actions, the FFRMS floodplain is the area that results from adding three feet to the base flood elevation as established by the effective FEMA FIRM or FIS or—if available —a FEMA-provided preliminary or pending FIRM or FIS or advisory base flood elevations, whether regulatory or informational in nature. However, an interim or preliminary FEMA map cannot be used if it is lower than the current FIRM or FIS.

a. Does your project occur in the FFRMS floodplain?

☐Yes, continue to part b.

☐No. Review for floodplain management is complete.

b. Is your project located in any of the floodplain categories below? Select all that apply. If none apply, continue to question 7.

☐ Floodway: *Continue to Question 5. Floodways.*

☐ Coastal High Hazard Area (V Zone) or LiMWA: *Continue to Question 6. Coastal High Hazard Areas and LiMWAs.*

5. Floodways

Do the floodway exemptions at 55.8 or 55.21 apply?

☐ Yes

The 8-Step Process is required. Document mitigation measures necessary to meet the requirements in 55.8 or 55.21. Provide a completed 8-Step Process, including the early public notice and the final notice.

Continue to Question 7. 8-Step Process.

☐ No

Federal assistance may not be used at this location. You must either choose an alternate site or cancel the project at this location.

6. Coastal High Hazard Area (V Zone) and LiMWAs

Do the exemptions at 55.8 or 55.21 apply?

☐ Yes

The 8-Step Process is required. Document mitigation measures necessary to mee the requirements in 55.8 or 55.21. Provide a completed 8-Step Process, including the early public notice and the final notice.

Continue to Question 7. 8-Step Process.

☐ No

Federal assistance may not be used at this location. You must either choose an alternate site or cancel the project at this location.

7. 8-Step Process.

Does the 8-Step Process apply? Select one of the following options:

☐ 8-Step Process is inapplicable per 55.13.

Select the applicable citation:

☐ (a) 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 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, coastal high hazard area, or LiMWA;

☐ (b) 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)(12);

☐ (c) HUD or a recipient's actions involving the disposition of individual HUD or recipient held, one- to four-family properties;

☐ (d) HUD guarantees under the Loan Guarantee Recovery Fund Program (24 CFR part 573), 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;

☐ (e) The approval of financial assistance to lease units within an existing structure located within the floodplain, but only if;

(1) 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); and

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

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

☐ (f) Special projects for the purpose of improving efficiency of utilities or installing renewable energy that involve the repair, rehabilitation, modernization, weatherization, or improvement of existing structures or infrastructure, do not meet the thresholds for "substantial improvement" under § 55.2(b)(12), and do not include the installation of equipment below the FFRMS floodplain elevation.

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

☐ 5-Step Process is applicable per 55.14.

Provide documentation of 5-Step Process.

Select the applicable citation:

☐ (a) 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).

☐ (b)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.

☐ (c) 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 increased by more than 20 percent.

☐ (d) 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 increased by more than 20 percent

☐ (e) HUD's or the recipient's actions under any HUD program involving the repair, rehabilitation, or replacement of existing nonstructural improvements including streets, curbs and gutters, where any increase of the total impervious surface area of the facility is de minimis. This provision does not include critical actions, levee systems, chemical storage facilities (including any tanks), wastewater facilities, or sewer lagoons.

Continue to Question 8. Mitigation.

☐ 8-Step Process applies.

Provide a completed 8-Step Process, including the early public notice and the final notice.

Continue to Question 8. Mitigation.

8. Mitigation

For the project to comply with this section, all adverse impacts must be mitigated. Explain in detail the measures that must be implemented to mitigate the impact or effect, including the

timeline for implementation. Note: newly constructed and substantially improved structures within the FFRMS floodplain must be elevated to the FFRMS floodplain elevation or floodproofed, if applicable.

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

- ☐ Buyout and demolition or other supported clearance of floodplain structures
- ☐ Insurance purchased in excess of statutory requirement under the Flood Disaster Protection Act of 1973
- ☐ Permeable surfaces
- ☐ Natural landscape enhancements that maintain or restore natural hydrology
- ☐ Planting or restoring native plant species
- ☐ Bioswales
- ☐ Stormwater capture and reuse
- ☐ Green or vegetative roofs with drainage provisions
- ☐ Natural Resources Conservation Service conservation easements or similar easements
- ☐ Floodproofing of structures as allowable (e.g. non-residential floors)
- ☐ Elevating structures (including freeboard above the required base flood elevations)
- ☐ Levee or structural protection from flooding
- ☐ Channelizing or redefining the floodway or floodplain through a Letter of Map Revision (LOMR)

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:

- FIRM panel numbers
- CISA data or maps
- Information on other data or tools used or accessed
- 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 Sinapalo Road and Drainage Improvement Project is located in Sinapalo Village, Rota. The CNMI Department of Public Works has determined that the project is not located in the special flood hazard area.

Include all documentation supporting your findings in your submission to HUD

Are formal compliance steps or mitigation required?

- ☐ Yes
- ☒ No

Worksheet Summary for 2013 Version
Compliance Determination

Attach 'Floodplain Management Partner Worksheet' (OMB No. 2506-0177), FIRM map indicating project location, and summary of 8-step or 5-step decision making process if applicable.

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

Include all documentation supporting your findings in your submission to HUD

Are formal compliance steps or mitigation required?

☐ Yes

☒ No

APPENDIX D

Sinapalo Road Project

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

July 15, 2024



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

Dear Ms. Cruz:

The Northern Marianas Housing Corporation (NMHC) is in the process of preparing the Environmental Assessment Statutory Checklist (24 CFR § 58.35) for the Rota Mayor's Office, Sinapalo road and drainage Improvement project, located in Sinapalo village, Rota, GPS Latitude/Longitude: 14.162276, 145.241923.

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 **Rehabilitation 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, Gases and Radon:***

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

3. ***Environmental Justice:***

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

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

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233-9450
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4. ***Sole Source Aquifers:***
That the project is not located within an area designed by EPA as being supported by sole source aquifer, ***OR*** the project need not be referred to EPA for evaluation according to the HUD-EPA (Region IX) Sole Source Aquifer Memorandum of Understanding of 1990.

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

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

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

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

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

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

Sincerely,

Jonathan V. Arriola
Project Manager
Northern Marianas Housing Corporation

NORTHERN MARIANAS HOUSING CORPORATION

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

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

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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.

08/22/2024

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

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

Date	**August 22, 2024**
Request From	**Northern Marianas Housing Corporation**
Project Name	**CDBG-DR - Sinapalo Road**
Project Type	**Road Rehabilitation and Drainage Improvement**

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 under the DEQ's regulations. 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.

Wastewater, Earthmoving, & Erosion Control	-Based on the scope of work, a One-Start earthmoving permit **is required** for the proposed road rehabilitation/construction project on Rota.
Water Quality/Nonpoint Source	Best Management practices must be implemented to prevent storm water pollutants from project site into CNMI and US waters.
Clean Air Program	Water suppression, tarp coverage, or other best practices must be implemented to control fugitive dust from construction activities. **The proposed project site is not adjacent to any known or suspected site containing radon gas that meet EPA's action level (4 pCi/L (picocuries per liter) or more).**
Safe Drinking Water	No comments from SDW.
Toxic Waste Management	1.New Construction: The One-Start Permit condition shall cover all potential discoveries of hazardous waste or material. All parties pertaining to the project shall cease activities upon discovery of any hazardous materials or unusual substance or objects, and shall notify the discovery to DEQ. Failure to report findings may result in enforcement proceedings. 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. 3. If heavy equipment will be utilized at these project sites, the company performing the activities shall have spill response equipment readily available in case of a incident. **4. If designated buildings for demolition were constructed prior to 1978, a Lead-based paint test should be performed to identify the possibility of contaminants. The test should be conducted before any demolition occurs to ensure that no contaminants will be present within the dust particulates.**
Solid Waste Management	Recycle materials to to be generated shall be taken to DEQ permitted facilities and non-recyclable materials must be disposed of according to the DEQ Solid Waste Management Regulations.
Storage Tanks	The Storage Tanks Branch has no comments or concerns
Site Assessment & Remediation (Brownfields & Formerly Used Defense Sites)	No comments or concerns from the SAR Branch
Pesticides	No comments or concerns from the Pesticides Branch

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July 15, 2024



COPY

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

Dear Ms. Cruz:

The Northern Marianas Housing Corporation (NMHC) is in the process of preparing the Environmental Assessment Statutory Checklist (24 CFR § 58.35) for the Rota Mayor's Office, Sinapalo road and drainage Improvement project, located in Sinapalo village, Rota, GPS Latitude/Longitude: 14.162276, 145.241923.

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 **Rehabilitation 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, Gases and Radon:***

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.

Air Quality (CEST and EA)

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

Scope of Work

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

   ☐ Yes

   → *Continue to Question 2.*

   ☒ No

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

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

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

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

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

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

Describe the findings:

→ *Continue to Question 3.*

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

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

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

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

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

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

Worksheet Summary

Compliance Determination

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

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

The Sinapalo Road and Drainage Improvement Project is located in Sinapalo Village, Rota.
The CNMI BECQ has determined the project conforms with the EPA-approved State Implementation Plan (SIP).

Are formal compliance steps or mitigation required?

☐ Yes

☒ No

Contamination and Toxic Substances (Single Family 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. **Were any on-site or nearby toxic, hazardous, or radioactive substances[1] (excluding radon) 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?)** Provide a map or other documentation of absence or presence of contamination[2] and explain evaluation of site contamination in the Worksheet below.

   ☒ No

   Explain:

   The Sinapalo Road and Drainage Improvement Project is located in Sinapalo Village, Rota and its an existing unpaved road.

   → *Continue to the next question.*

[1] This question covers the presence of radioactive substances excluding radon. Radon is addressed in question 2.

[2] Utilize EPA's Enviromapper and state/tribal databases to identify nearby dumps, junk yards, landfills, hazardous waste sites, and industrial sites, including EPA National Priorities List Sites (Superfund sites), CERCLA or state-equivalent sites, RCRA Corrective Action sites with release(s) or suspected release(s) requiring clean-up action and/or further investigation. Additional supporting documentation may include other inspections and reports.

☐ Yes

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

☐ Check here if an ASTM Phase I Environmental Site Assessment (ESA) report was utilized. [Note: HUD regulations does not require an ASTM Phase I ESA report for single family homes]

2. **Evaluate the building(s) for radon. Do all buildings meet any of the exemptions[3] from having to consider radon in the contamination analysis listed in CPD Notice CPD-23-103?**

☐ Yes

Explain:

→ *If **no** non-radon contamination was found, the review is in compliance with this section. Continue to the Worksheet Summary below. If non-radon contamination **was** found, continue to the Mitigation question.*

3

- Buildings with no enclosed areas having ground contact.
- Buildings containing crawlspaces, utility tunnels, or parking garages would not be exempt, however buildings built on piers would be exempt, provided that there is open air between the lowest floor of the building and the ground.
- Buildings that are not residential and will not be occupied for more than 4 hours per day.
- Buildings with existing radon mitigation systems: document radon levels are below 4.0 pCi/L with test results dated within two years of submitting the application for HUD assistance and document the system includes an ongoing maintenance plan that includes periodic testing to ensure the system continues to meet the current EPA recommended levels. If the project does not require an application, document test results dated within two years of the date the environmental review is certified. Refer to program office guidance to ensure compliance with program requirements.
- Buildings tested within five years of the submission of application for HUD assistance:
  - test results document indoor radon levels are below current the EPA's recommended action levels of 4.0 pCi/L. For buildings with test data older than five years, any new environmental review must include a consideration of radon using one of the methods in Section A below.

☐ No

→ *Continue to the following question.*

3. **Is the proposed project new construction or substantial rehabilitation where testing will be conducted but cannot yet occur because building construction has not been completed?**

   ☐ Yes

   → *Compliance with this section is conditioned on post-construction testing being conducted, followed by mitigation, if needed. Radon test results, along with any needed mitigation plan, must be included in the Environmental Review Record.*

   ☐ No

   → *Continue to the next question.*

4. **Was radon testing or a scientific data review conducted that provided a radon concentration level in pCi/L?**

   ☐ Yes

   → *Continue to the next question.*

   ☐ No

   If no testing was conducted and a review of science-based data offered a lack of science-based data for the project site, then document and include the steps taken to look for documented test results and science-based data as well as the basis for the conclusion that testing would be infeasible or impracticable.

   Explain:

   → *If **no** non-radon contamination was found, the review is in compliance with this section. Continue to the Worksheet Summary below. If non-radon contamination **was** found, continue to the Mitigation question below.*

5. **How was radon data collected?**

☐ All buildings involved were tested for radon

→ *Continue to question six below.*

☐ A review of science-based data was conducted

Enter the Radon concentration value, in pCi/L, derived from the review of science-based data: [ ]

Provide the documentation[4] used to derive this value:

[ ]

→ *If Radon concentration value above is* ***less than*** *4.0 pCi/L AND no non-radon contamination was found then based on the response, the review is in compliance with this section. Continue to the Screen Summary at the bottom of this screen.*

If Radon concentration value above is 4.0 pCi/L ***or greater*** *radon mitigation is required. Continue to the Mitigation question.*

6. **Were the radon test results for any dwelling unit tested at or above 4.0 pCi/L?**

☐ Yes

Radon mitigation is required. Continue with the prompts directly below.

Enter the total number of dwelling units tested:

[ ]

How many dwelling units tested at or above 4.0 pCi/L:

[ ]

[4] For example, if you conducted radon testing then provide a testing report (such as an ANSI/AARST report or DIY test) if applicable (note: DIY tests are not eligible for use in multifamily buildings), or documentation of the test results. If you conducted a scientific data review, then describe and cite the maps and data used and include copies of all supporting documentation. Ensure that the best available data is utilized, if conducting a scientific data review.

Enter the highest radon test result value:

Document the test results for all dwelling units tested with a copy of the test results for all dwelling units or testing report(s) covering all units.

☐ No

Provide a copy of the test results for all dwelling units tested or testing report(s) covering all units tested.

→ *If **no** non-radon contamination was found, the review is in compliance with this section. Continue to the Screen Summary at the bottom of this screen.*

*If non-radon contamination **was** found, continue to the Mitigation question.*

7. Mitigation

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

For instances where radon mitigation is required (i.e. where test results demonstrated radon levels at 4.0 pCi/L and above), then you must include a radon mitigation plan.[5]

Can all adverse environmental impacts be mitigated?

☐ All adverse environmental impacts cannot feasibly be mitigated
→ Project cannot proceed at this location.

☐ Yes, all adverse environmental impacts can be eliminated through mitigation, and/or consideration of radon and radon mitigation, if needed, will occur following construction.
→ Provide all **mitigation requirements**[6] and documents in the Screen Summary at the bottom of this screen.

---

[5] Refer to CPD Notice CPD-23-103 (with link to it at https://www.hud.gov/sites/dfiles/CPD/documents/CPD_Notice_on_Addressing_Radon_in_the_Environmental_Review_Process.pdf) for additional information on radon mitigation plans.

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

8. **Describe how compliance was achieved. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls[7], or use of institutional controls[8].**

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

- ☐ Complete removal
- ☐ Risk-based corrective action (RBCA)
- ☐ Other

→ *Continue to the Worksheet Summary.*

[7] Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, caps, covers, dikes, trenches, leachate collection systems, radon mitigation systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, slurry walls and ground water pumping systems.

[8] 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.

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

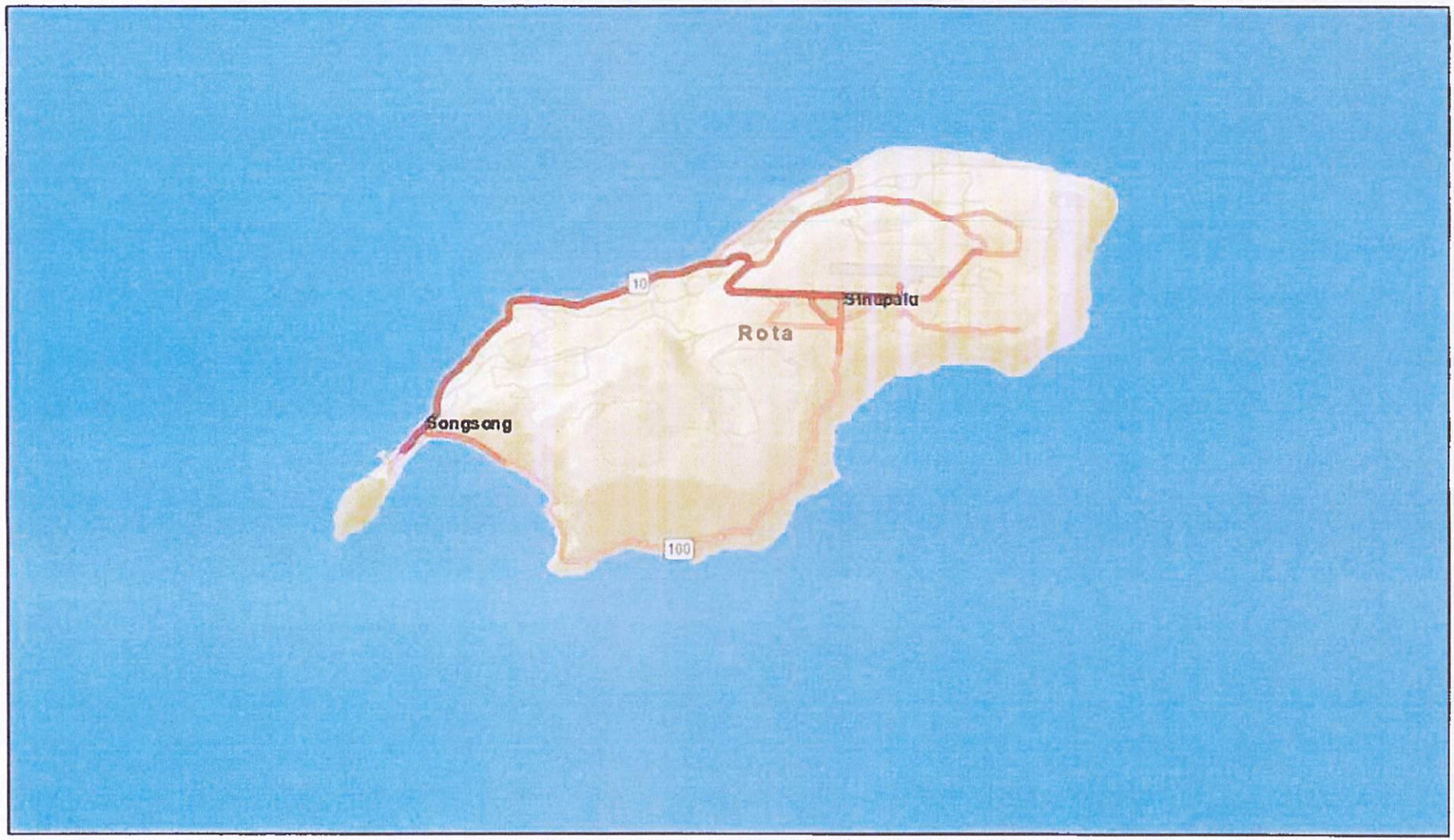
The Sinapalo Road and Drainage Improvement Project is located in Sinapalo Village, Rota. The CNMI BECQ does not believe that this project will have an impact on the environment as defined by the National Environmental Policy Act.

Are formal compliance steps or mitigation required?

☐ Yes

☒ No

Sinapalo Road and Drainage Improvement Project -



April 8, 2025

1:124,730

0 1 2 4 mi

0 1.5 3 6 km

Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Contamination and Toxic Substances (Single Family 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. **Were any on-site or nearby toxic, hazardous, or radioactive substances[1] (excluding radon) 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?)** Provide a map or other documentation of absence or presence of contamination[2] and explain evaluation of site contamination in the Worksheet below.

   ☒ No

   Explain:

   The Sinapalo Road and Drainage Improvement Project is located in Sinapalo Village, Rota and it is an existing unpaved road.

   → *Continue to the next question.*

[1] This question covers the presence of radioactive substances excluding radon. Radon is addressed in question 2.

[2] Utilize EPA's Enviromapper and state/tribal databases to identify nearby dumps, junk yards, landfills, hazardous waste sites, and industrial sites, including EPA National Priorities List Sites (Superfund sites), CERCLA or state-equivalent sites, RCRA Corrective Action sites with release(s) or suspected release(s) requiring clean-up action and/or further investigation. Additional supporting documentation may include other inspections and reports.

☐ Yes

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

☐ Check here if an ASTM Phase I Environmental Site Assessment (ESA) report was utilized. [Note: HUD regulations does not require an ASTM Phase I ESA report for single family homes]

2. **Evaluate the building(s) for radon. Do all buildings meet any of the exemptions[3] from having to consider radon in the contamination analysis listed in CPD Notice CPD-23-103?**

☐ Yes

Explain:

→ *If **no** non-radon contamination was found, the review is in compliance with this section. Continue to the Worksheet Summary below. If non-radon contamination **was** found, continue to the Mitigation question.*

3

- Buildings with no enclosed areas having ground contact.
- Buildings containing crawlspaces, utility tunnels, or parking garages would not be exempt, however buildings built on piers would be exempt, provided that there is open air between the lowest floor of the building and the ground.
- Buildings that are not residential and will not be occupied for more than 4 hours per day.
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- Buildings tested within five years of the submission of application for HUD assistance:
    - test results document indoor radon levels are below current the EPA's recommended action levels of 4.0 pCi/L. For buildings with test data older than five years, any new environmental review must include a consideration of radon using one of the methods in Section A below.

☐ No

→ *Continue to the following question.*

3. **Is the proposed project new construction or substantial rehabilitation where testing will be conducted but cannot yet occur because building construction has not been completed?**

   ☐ Yes

   → *Compliance with this section is conditioned on post-construction testing being conducted, followed by mitigation, if needed. Radon test results, along with any needed mitigation plan, must be included in the Environmental Review Record.*

   ☐ No

   → *Continue to the next question.*

4. **Was radon testing or a scientific data review conducted that provided a radon concentration level in pCi/L?**

   ☐ Yes

   → *Continue to the next question.*

   ☐ No

   If no testing was conducted and a review of science-based data offered a lack of science-based data for the project site, then document and include the steps taken to look for documented test results and science-based data as well as the basis for the conclusion that testing would be infeasible or impracticable.

   Explain:

   → *If **no** non-radon contamination was found, the review is in compliance with this section. Continue to the Worksheet Summary below. If non-radon contamination **was** found, continue to the Mitigation question below.*

5. **How was radon data collected?**

☐ All buildings involved were tested for radon

→ *Continue to question six below.*

☐ A review of science-based data was conducted

Enter the Radon concentration value, in pCi/L, derived from the review of science-based data: [ ]

Provide the documentation[4] used to derive this value:

[ ]

→ *If Radon concentration value above is **less than** 4.0 pCi/L AND no non-radon contamination was found then based on the response, the review is in compliance with this section. Continue to the Screen Summary at the bottom of this screen.*

*If Radon concentration value above is 4.0 pCi/L **or greater** radon mitigation is required. Continue to the Mitigation question.*

6. **Were the radon test results for any dwelling unit tested at or above 4.0 pCi/L?**

☐ Yes

Radon mitigation is required. Continue with the prompts directly below.

Enter the total number of dwelling units tested:

[ ]

How many dwelling units tested at or above 4.0 pCi/L:

[ ]

[4] For example, if you conducted radon testing then provide a testing report (such as an ANSI/AARST report or DIY test) if applicable (note: DIY tests are not eligible for use in multifamily buildings), or documentation of the test results. If you conducted a scientific data review, then describe and cite the maps and data used and include copies of all supporting documentation. Ensure that the best available data is utilized, if conducting a scientific data review.

Enter the highest radon test result value:

Document the test results for all dwelling units tested with a copy of the test results for all dwelling units or testing report(s) covering all units.

☐ No

Provide a copy of the test results for all dwelling units tested or testing report(s) covering all units tested.

→ *If **no** non-radon contamination was found, the review is in compliance with this section. Continue to the Screen Summary at the bottom of this screen.*

*If non-radon contamination **was** found, continue to the Mitigation question.*

7. Mitigation

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

For instances where radon mitigation is required (i.e. where test results demonstrated radon levels at 4.0 pCi/L and above), then you must include a radon mitigation plan.[5]

Can all adverse environmental impacts be mitigated?

☐ All adverse environmental impacts cannot feasibly be mitigated
→ Project cannot proceed at this location.

☐ Yes, all adverse environmental impacts can be eliminated through mitigation, and/or consideration of radon and radon mitigation, if needed, will occur following construction.
→ Provide all **mitigation requirements**[6] and documents in the Screen Summary at the bottom of this screen.

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[5] Refer to CPD Notice CPD-23-103 (with link to it at https://www.hud.gov/sites/dfiles/CPD/documents/CPD_Notice_on_Addressing_Radon_in_the_Environmental_Review_Process.pdf) for additional information on radon mitigation plans.

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

8. **Describe how compliance was achieved. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls[7], or use of institutional controls[8].**

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

- ☐ Complete removal
- ☐ Risk-based corrective action (RBCA)
- ☐ Other

→ *Continue to the Worksheet Summary.*

[7] Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, caps, covers, dikes, trenches, leachate collection systems, radon mitigation systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, slurry walls and ground water pumping systems.

[8] 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.

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 Sinapalo Road and Drainage Improvement Project is located in Sinapalo Village, Rota. The CNMI BECQ does not believe that this project will have an impact on the environment as defined by the National Environmental Policy Act.

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 Sinapalo Road and Drainage Improvement Project is located in Sinapalo Village, Rota. The CNMI BECQ does not believe that the project will have significant impact on the environment as defined by NEPA.

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 area[1]?

☐ No

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

☐ Yes

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

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

☐ Unacceptable: (Above 75 decibels)

Indicate noise level here: [ ]

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

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

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

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

☐ Mitigation as follows will be implemented:

[ ]

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

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

→ *Continue to the Worksheet Summary.*

Worksheet Summary

Compliance Determination

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

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

The Sinapalo Road and Drainage Improvement Project is located in Sinapalo Village, Rota. The CNMI BECQ concurs with NMHC that the project does not involve development of noise sensitive uses OR ambient noise level is 65 LDN (or CNEL) or less, based upon the HUD Noise Assessment Guidelines (NAG) study for calculating noise levels.

Are formal compliance steps or mitigation required?

☐ Yes

☒ No

Wetlands (CEST and EA)

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

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

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

   ☐ Yes → *Continue to Question 2.*

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

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

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

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

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

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

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

Worksheet Summary

Compliance Determination

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

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

The CNMI DCRM has determined that the project site 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 USDI Fish & Wildlife Service or U.S. Corps of Engineers.
The Sinapalo Road and Drainage Improvement Project is located in Sinapalo Village, Rota.

Are formal compliance steps or mitigation required?

☐ Yes

☒ No

U.S. Fish and Wildlife Service

National Wetlands Inventory

Sinapalo Road and Drainage Improvement



April 9, 2025

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

Sinapalo Road Project

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

July 19th 2024

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

IR-24-39: Information Requests for projects of the Rota Mayor's Office

Dear Mr. Arriola:
Your agency has requested information from the Division of Fish and Wildlife regarding potential impacts to threatened or endangered (T&E) species for projects from the Rota Mayor's Office situated Songsong and Sinapalo Village, Rota. **This letter is NOT a permit or approval of the proposed projects. NO land clearing activities or construction can begin until an application has been submitted and approved by DFW.**

Our preliminary comments are as follows:

1) Sinapalo Road and Drainage Improvement Project, Sinapalo Village, Rota
The area is already developed and appears to have no habitat for T&E species. No effects to T&E species are anticipated.

2) Liyu Road and Drainage Improvement Project, Sonsong Village, Rota
The area is already developed and appears to have no habitat for T&E species. No effects to T&E species are anticipate

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.

Sincerely,

Yanghongfan Wang

Yanghongfan Wang
Threatened and Endangered Species Biologist

Cc: Rosemary Camacho, Acting Director, DFW
Henry Fandal, Wildlife Section Supervisor, DFW

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

7/16/24
RECEIVED

July 15, 2024

Ms. Rosemary C. Camacho
Acting Director
Division of Fish and Wildlife
P.O. Box 10007
Saipan, MP 96950

Re: Request for a Determination of Effect for Wetlands and Endangered Species. Rota Mayor's Office, Sinapalo road and drainage Improvement project.

Dear Ms. Camacho,

The Northern Marianas Housing Corporation (NMHC) is in the process of preparing the Environmental Assessment Statutory Checklist (24 CFR § 58.35) for the Rota Mayor's Office, Sinapalo road and drainage Improvement Project. is located in Sinapalo Village, Rota, GPS Latitude/Longitude: 14.162276, 145.241923.

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

In order for our office to complete the Environmental Review, an Environmental Assessment Statutory Checklist (24 CFR § 58.36) must be completed. We kindly request a Determination of Effect based on HUD requirement on Endangered Species Act 50 CFR 402 on the location mentioned above.

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

Endangered Species Act (CEST and EA)

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

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

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

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

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

Explain your determination:

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

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

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

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

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

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

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

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

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

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

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

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

→ *Continue to Question 4, Informal Consultation.*

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

→ *Continue to Question 5, Formal Consultation.*

4. Informal Consultation is required

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

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

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

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

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

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

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

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

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

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

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

Worksheet Summary

Compliance Determination

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

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

The CNMI Division of Fish & Wildlife has determined that they do not anticipate impacts to T&E species. The Sinapalo Road and Drainage Improvement Project is located in Sinapalo Village, Rota.

Are formal compliance steps or mitigation required?

☐ Yes

☒ No

APPENDIX F

Sinapalo Road Project

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

July 15, 2024

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

Re: Request for a Determination of Effect, Rota Mayor's Office, Sinapalo road and drainage Improvement Project.

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 Rota Mayor's Office, Sinapalo road and drainage Improvement project, located in Sinapalo village, Rota, GPS Latitude/Longitude: 14.162276, 145.241923

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,

7/17/24

Jonathan I. Arriola
Project Manager

Project Maps

A map (or maps) that delineate(s) the following items for each target area must be included in the application package:

1. Existing Conditions Map: Provide a detailed map of the existing improvements. The map should delineate such items as the location of project and/or size of waterlines, elevated water tanks, sewer lines, manholes, location of treatment plants, etc.

2. Proposed Improvements Map: Provide a detailed map showing the location of project, sizes, etc. of the proposed improvements.

3. Census tracts and/or block groups (by number) and/or logical records numbers.
4. Location of concentrations of low- and moderate-income persons, showing numbers and percent by census tracts and/or block groups and/or logical record number.

5. Boundaries of areas in which the activities will be concentrated; and

6. The specific location of each activity.

Note: *The Existing Conditions map and the Proposed Improvements map may be combined into one map if all the information shown can be depicted in such a way as to easily determine the difference between the existing and proposed.*





SINAPALO ROAD TO ELEMENTARY SCHOOL

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

PROJECT: SINAPALO ELEMENTARY ROAD IMPROVEMENT PROJECT

LOCATION: SINAPALO, SAIPAN

LENGTH: 700 Linear Feet

WIDTH: 20 Feet Wide (proposed pavement)

SCOPE OF WORK

BRIEF DESCRIPTION:

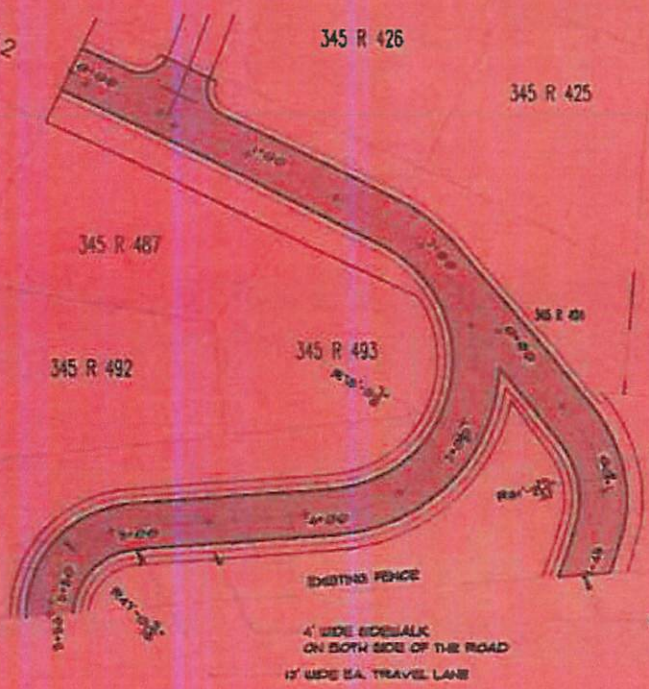
The proposed road is approximately 700 feet from the existing road to the entrance (Gate) of the Sinapalo Elementary School. The existing road is about 10 feet wide composed of compacted coral basecourse and no drainage system in place.

The proposed road project includes, construction survey and staking, to identify the boundary of the right of way. The roadway excavation is limited 6" depth, and application of 6" thick basecourse materials approximately 2000 square yard, application of eight inch (8") thick concrete pavement approximately 78 square yard, permanent traffic signs and pavement markings, and 4' wide concrete sidewalk.

The installation of traffic control plans and erosion control measures is vital for the safety of the traffic and of the community.

Prepared by:

Isagani C. Salurao
DPW Highway Engineer



SINAPALO ELEMENTARY SCHOOL

1 / C-1 **ROAD PLAN**

NOT TO SCALE

COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

PROJECT TITLE: SINAPALO ELEMENTARY SCHOOL ROAD IMPROVEMENT

CONTENTS: ROAD LAYOUT

ANTHONY A. GAMAONO

RAY N. YORA

DRAWING NO. C-1

Prime and Unique Farmlands Map

USDA-NRCS
Map Prepared by Solly Takai, Soil Conservationist - 08/01/2024
Response to Categorically Excluded Statutory Checklist
"Sinapalo Road & Drainage Improvement Project - Sinapalo, Rota"

N



0 250 500 1000
Feet

USDA United States Department of Agriculture
Natural Resources Conservation Service

Project Location

U.S. Department of Agriculture

FARMLAND CONVERSION IMPACT RATING

PART I *(To be completed by Federal Agency)*	Date Of Land Evaluation Request July 15, 2024
Name of Project Sinapalo Road & Drainage Improvement Proposed Land Use Improvement Project	Federal Agency Involved NMHC-CDBG-DR County and State Sinapalo, Rota
PART II *(To be completed by NRCS)*	Date Request Received By NRCS 07/17/2024 — Person Completing Form: S. Takai

Does the site contain Prime, Unique, Statewide or Local Important Farmland? *(If no, the FPPA does not apply - do not complete additional parts of this form)*	YES ☐	NO ☑	Acres Irrigated / Average Farm Size
Major Crop(s)	Farmable Land In Govt. Jurisdiction Acres: %		Amount of Farmland As Defined in FPPA Acres: %
Name of Land Evaluation System Used	Name of State or Local Site Assessment System		Date Land Evaluation Returned by NRCS

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

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

Reason For Selection:

Name of Federal agency representative completing this form: Pamela LaBun, D.C. Date: 8/12/24

(See instructions on reverse side)

Form AD-1006 (03-02)

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 15, 2024

COPY

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

Re: Request for a Determination of Effect, Rota Mayor's Office, Sinapalo road and drainage Improvement Project.

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 Rota Mayor's Office, Sinapalo road and drainage Improvement project, located in Sinapalo village, Rota, GPS Latitude/Longitude: 14.162276, 145.241923

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

7/17/24

RECEIVED

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

   ☒No

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

   The project is not in an agricultural land and therefore exempt.

   → *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 your project meet one of the following exemptions?**
   - Project on land already in or committed to urban development or used for water storage (7 CFR 658.2(a)). To check whether the project location is located in an urbanized area, use the following US Census Bureau application: TIGERweb
   - Construction limited to on-farm structures needed for farm operations
   - Construction is limited to new minor secondary (accessory) structures such as a garage or storage shed

     - ☐ Yes → *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 → *Continue to Question 3.*

3. **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 4.*

4. **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 Sinapalo Road and Drainage Improvement Project is located in Sinapalo Village, Rota. The Natural Resource Conservation Service has determined that the project is not in a farmland as per the Farm Protection Policy Act of 1981, particularly sections 1504 (b) and 1541; 7 CFR Part 658.

Are formal compliance steps or mitigation required?

☐ Yes

☒ No

APPENDIX G

Sinapalo Road Project

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 Sinapalo Road and Drainage Improvement Project is located in Sinapalo Village, Rota.

The CNMI has no Sole Source Aquifers.

Are formal compliance steps or mitigation required?

☐ Yes

☒ No

APPENDIX H

Sinapalo Road Project

Wild and Scenic River

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 Sinapalo Road and Drainage Improvement Project is located in Sinapalo Village, Rota.

The CNMI has no Wild and Scenic Rivers.

Are formal compliance steps or mitigation required?

☐ Yes

☒ No

APPENDIX I

Sinapalo Road Project

Historic Preservation

Commonwealth of the Northern Mariana Islands
Office of State Historic Preservation Officer
Department of Community & Cultural Affairs
Capitol Hill, Chuuk Court, Bldg. 1231
Tel: (670)664-2587, Caller Box 10007
Saipan, MP 96950

October 21, 2024

Jonathan I. Arriola
CDBG-DR Project Manager
Northern Marianas Housing Corporation
drprojectmanager@nmhcgov.net

Serial: 36947
File: 6.7.25.07

SUBJECT: SECTION 106 REVIEW AND CONCURRENCE LETTER FOR DETERMINATION OF NO HISTORIC PROPERTIES AFFECTED FOR NMHC CDBG-DR HOUSING PROJECT- PROPOSED ROTA MAYOR'S OFFICE SINAPALO ELEMENTARY SCHOOL ENTRANCE ROAD AND DRAINAGE IMPROVEMENT- ISLAND OF ROTA- FUNDED BY THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (U.S. HUD) THROUGH THE COMMUNITY DEVELOPMENT BLOCK GRANT DISASTER RECOVERY (CDBG-DR)

Dear Mr. Arriola,

Thank you for contacting the Historic Preservation Office (HPO) regarding Section 106 consultation for the above subject project. After careful consideration and review of the documents you have provided, we concur with NMHC's determination of "No Historic Properties Affected" for the proposed Rota Mayor's Office Sinapalo Elementary School Entrance Road and Drainage Improvement Project. **No further archaeological work is recommended** for this project as the area of potential effect (APE) is not located within a known archaeologically sensitive zone and NMHC has determined that the proposed project is on a previously developed parcel of land that is less than 50 years old and not an eligible historic property.

However, although the HPO hereby concurs with the determination of effect, if the particulars of the projects should be altered to include other areas not yet designated, or in the event that unforeseen significant historic properties and/or cultural resources are encountered during subsurface excavation activities, then your office must cease work immediately. Additionally, you are required to notify the HPO so that we may discuss mitigation and preservation measures.

The necessary consultations have been conducted and it has been concluded that the project may proceed.

We appreciate your attention to this matter and your commitment to ensuring compliance with the Historic Preservation Office. Should you have any questions or concerns regarding this determination, please contact us at (670) 664-2120.

Sincerely,

Katherine Bermudez, M.A.
Staff Archaeologist

Frank M. Rabauliman
State Historic Preservation Officer

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

HPO: 25-005

Department of Community & Cultural Affairs
HISTORIC PRESERVATION OFFICE
DATE: 10/9/24
TIME: 9:43 am
RECEIVED BY: Shizelle

October 09, 2024

Mr. Frank M. Rabauliman
State Historic Preservation Officer
CNM Historic Preservation Office
P.O. Box 500090
Saipan, MP 96950

Subject: Concurrence from HPO—Proposed Rota Mayor's Office Sinapalo Road and Drainage Improvement Project

Dear Mr. Rabauliman,

Our agency would like to request your approval in concurring with our determination of "No Adverse Effect" for the proposed Sinapalo Elementary School entrance road and drainage improvement project.

As a requirement with the Department of Housing and Urban Development (HUD) environmental review, we are required to obtain concurrence for the Historic Preservation Act of 1966, particularly sections 106 and 1 10; 36 CFR Part 800.

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

Summary of Completed and Proposed Identification Efforts

NMHC CDBG-DR has confirmed that the Project is an existing facility that is not more than 50 years old and therefore, not an eligible historic property.

NMHC CDBG-DR has identified that the proposed project is a developed parcel of land and therefore, not an eligible historic property.

On August 29, 2024, NMHC CDBG-DR visited the CNMI Division of Historic Preservation (HPO) and reviewed reports of previous archeological investigations in the vicinity of the project area. No reports of previous archaeological investigations in the vicinity of the project area were found during the search in the HPO library. Furthermore, per communication with the HPO, there are no documented historic properties in the vicinity of the project area.

On August 29, 2024, NMHC researched the CNMI National Register of Historic Places and concluded that there are no findings of any historic properties within the vicinity of the proposed project area.

Attached to this letter is support for our findings. This request will not constitute a permit to allow any construction work. The contractor shall be responsible for applying for a permit before commencing construction work at the project site. Also enclosed are the scope of work and plans for the proposed construction work. Upon agreement of our determination, please sign below indicating concurrence of your agency.

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
CDBG-DR Project Manager
Northern Marianas Housing Corporation

Enclosures: Map of Location
Scope of Work

Concurrence:

Based on our research and consultation, we have reached a finding of "no historic properties affected". Per (d)(1)(i).your office has thirty days to object. If you concur with the findings in this submission, please sign and date on the line below and return as noted above. If you do not concur, we request that you express your concerns and objections clearly in writing so we may continue the consultation process as needed. Please also indicate in your non-concurrence letter if other sources of information should be checked, and if there are other parties you believe should be included in the consultation process.

Concurred by:

Frank M. Rabauliman
State Historic Preservation Officer

10/11/24
Date:


Sinapalo Head Start Center
Sinapalo Elementary School



Rota [edit]

Map all coordinates using OpenStreetMap

Download coordinates as: [show links]

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	Name on the Register	Image	Date listed	Location	Village	Description
1	Chudang Palii Japanese World War II Defensive Complex	Upload image	May 1, 2012 (#12000250)	Sunrise Hotel, Rte 100 14°09'12"N 145°12'06"E	Sinapalu	
2	Chugai Pictograph Site		August 31, 1998 (#98001065)	I'Chenchon Bird Sanctuary 14°09'12"N 145°16'03"E		Prehistoric pictograph cave
3	Commissioner's Office	Upload image	April 17, 1981 (#81000663)	North of Songsong Village 14°10'02"N 145°09'46"E	Songsong	
4	Dugi Archeological Site	Address Restricted	February 11, 1985 (#85000287)	Address Restricted	Songsong	
5	Japanese Coastal Defense Gun		November 2, 1984 (#84000422)	Northeast of Songsong 14°07'13"N 145°09'59"E	Songsong	
6	Japanese Hospital	Upload image	April 16, 1981 (#81000664)	West side of Sasanhaya Bay 14°08'13"N 145°08'18"E	Songsong	
7	Mochong		September 11, 1985 (#85002361)	Address Restricted	Songsong	
8	Nanyo Kohatsu Kabushiki Kaisha Sugar Mill		April 16, 1981 (#81000665)	Southwest of Songsong Village near the harbor 14°08'10"N 145°08'07"E	Songsong	
9	Rectory	Upload image	April 16, 1981 (#81000666)	North end of the island 14°09'59"N 145°10'00"E	Songsong	
10	Rota Latte Stone Quarry		December 23, 1974 (#74002225)	14°10'17"N 145°15'30"E	Songsong	

Contents hide

(Top)
Numbers of listings
Rota
Saipan
Tinian
See also
References

Download coordinates as: (show links)

	Name on the Register	Image	Date listed	Location	Village	Description
1	Chudang Pale Japanese World War II Defensive Complex	Upload image	May 1 2012	Sunrise Hotel Rte 100 14°09'12"N 145°12'06"E	Sinapalu	
2	Chugai' Petrograph Site		August 31 1998	Chenchon Bird Sanctuary 14°09'12"N 145°10'03"E		Prehistoric petrograph cave
3	Commissioner's Office	Upload image	April 17 1981	North of Songsong Village 14°10'02"N 145°09'46"E	Songsong	
4	Dugi Archeological Site	Address Restricted	February 11 1985	Address Restricted	Songsong	
5	Japanese Coastal Defense Gun		November 2 1984	Northeast of Songsong 14°07'13"N 145°09'59"E	Songsong	
6	Japanese Hospital	Upload image	April 16 1981	West side of Sasannaya Bay 14°08'13"N 145°08'18"E	Songsong	
7	Mochong		September 11 1985	Address Restricted	Songsong	
8	Nanyo Kohatsu Kabushiki Kaisha Sugar Mill		April 16 1981	Southwest of Songsong Village near the harbor 14°08'10"N 145°08'07"E	Songsong	
9	Rectory	Upload image	April 16 1981	North end of the island 14°09'58"N 145°10'00"E	Songsong	
10	Rota Latte Stone Quarry		December 23 1974	14°10'17"N 145°15'30"E	Songsong	

Saipan

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 15, 2024

Department of Community & Cultural Affairs
HISTORIC PRESERVATION OFFICE
DATE 7.16.24
TIME 10:01

COPY

Ms. Mertie T. Kani
Historic Preservation Officer
Historic Preservation Office
P.O. Box 500090
Saipan, MP 96950

Subject: National Historic Preservation Act Section 106 Consultation and CNMI HPO concurrence and determination of effect.

Dear Ms. Kani

Pursuant to U.S. Department of Housing and Urban Development regulations 24 CFR § 58.3, The Northern Marianas Housing Corporation (NMHC) requests concurrence with your office for the proposed Rota Mayor's Office Sinapalo Road and drainage project located on Sinapalo village, Rota, GPS Latitude/Longitude 14.162276, 145.241923

The Northern Marianas Housing Corporation is proposing to utilize the Community Development Block Grant Disaster Recovery (CDBG-DR) funds for the construction survey, roadway excavation, and grading, applied asphalt pavement, installation of permanent traffic signs and pavement markings, and construction of drainage system to the Rota Mayor's Office Sinapalo Road.

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.

The project is construction of paved road adjacent to Sinapalo Elementary School and Rota Headstart Building, replacing the existing dusty and storm-prone dirt road. This project aligns perfectly with the NMI CDBG-DR action plan road repair program, addressing typhoon resilience and community health concerns.

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:

In consultation with CNMI State Historic Preservation Officer concurs with NMHC determination of "No Historic Properties Affected" for the project for the Sinapalo Road and Drainage Improvement Project.

→ *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 Sinapalo Road and Drainage Improvement Project is located in Sinapalo Village, Rota.

Are formal compliance steps or mitigation required?

☐ Yes

☒ No

APPENDIX J

Sinapalo Road Project

Zoning

There is no Zoning in Rota