



Commonwealth of the Northern Mariana Islands
Office of the Governor
DEPARTMENT OF PUBLIC LANDS

SA07-1131

September 28, 2007

Environmental Management Support, Inc.

Attn: Mr. Don West
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910

Dear Mr. West:

**Subject: Fiscal Year 2008 Brownfields Hazardous Material Clean-up Grant –
Marpi Point Village Homestead, Commonwealth of the Northern
Mariana Islands**


The CNMI has an on-going Brownfields Assessment grant for the proposed Marpi Point Village Homestead. The area encompasses approximately 153 acres located on the northern part of Saipan. Designation of this parcel of public land for homestead subdivision is in conformance with the CNMI Land Use Plan.

The Department of Public Lands has not been able to commence the development of the proposed Marpi point Village Homestead site due to extensive amounts of Unexploded Ordinance (UXO) and other potential contamination existing at the site. Redevelopment of this site will provide more than 500 homestead lots. Currently there are over 4,000 qualified applicants for homesteads in the CNMI.

To complement the on-going Brownfields assessment grant, the CNMI Department of Public Lands is submitting an application requesting for cleanup grant in the amount of \$200,000.00 to complete clean-up work at the site. Bringing the area into a reusable condition will allow development of the site to benefit more than 500 homestead applicants whose dreams for first family residence will be fulfilled.

Your consideration and approval of this proposal would certainly benefit young families in the CNMI for their first dream home. You may contact Mr. Franz Reksid for further information or questions about Brownfields project in the CNMI.

Sincerely,

For 
JOHN S. DELROSARIO, JR.
Secretary

cc: US EPA Region 9
Attn: Carolyn Douglas – Brownfields Coordinator
75 Hawthorne Street SFD 1-1
San Francisco, CA 94105

Applicant Information	
1. Applicant Identification	Department of Public Lands Authority Joeten Dandan Commercial Building, Second Floor P.O. Box 500380, Saipan, MP 96950
2. Funding Requested	a. Grant type: Brownfields Cleanup Grant b. Amount: \$200,000 c. Contamination: Hazardous Substances
3. Location	Marpi Point Homestead Site, Island of Saipan Commonwealth of the Northern Mariana Islands (CNMI)
CNMI Governor	Honorable Benigno R. Fitial Juan S. Atalig Memorial Building Isa Drive, Capitol Hill Caller Box 10007, Saipan, MP 96950 Phone: (670) 664-2200 Fax: (670) 664-2211
Saipan Mayor	Honorable Juan B. Tudela P.O. Box 501457, Saipan, MP 96950 Phone: (670) 234-6208 Fax: (670) 234-1190
4. Contacts	
Project Contact	Mr. Franz Reksid, Project Manager Department of Public Lands Authority P.O. Box 500380, Saipan, MP 96950 Phone: (670) 234-3751 Fax: (670) 234-3755 E-mail: franz@dpl.gov.mp
Secretary	Mr. John S. Delrosario, Jr., Secretary Department of Public Lands Authority P.O. Box 500380, Saipan, MP 96950 Phone: (670) 234-3751 Fax: (670) 234-3755
5. Date Submitted	October 11, 2007 - submitted via USPS "Priority Mail"
6. Project Period	Two Years for Cleanup Grant
7. Population	a. 69,221 (2000 Census) b. Target Population 69,221: no one live on the specific site due to the potential UXO contamination
8. Other	None
9. Cooperative Partners	Department of Environmental Quality (DEQ) Frank Rabauliman, DEQ Director P.O. Box 501304 C.K. , Saipan, MP 96950 Phone: (670) 664-8500 Fax: (670) 664-8540 Department of Public Safety (DPS) Rebecca Warfield, DPS Commissioner Caller Box 10007 Civic Center Susupe, Saipan, MP 96950 Phone: (670) 664-9022 Fax: (670) 664-9019

Threshold Criteria

A. Applicants Eligibility:

The Department of Public Lands (DPL) meets EPA definition of "Government Entity Created by State Legislature." DPL is a department of the government of the Commonwealth of the Northern Mariana Islands (CNMI), pursuant to Article XI of the Commonwealth Constitution and under CNMI Public Law 15-2. CERCLA 101 (20) specially names the CNMI in the list of territories considered States for the purposes of this Act.

B. Letter from Government Environmental Authority:

Exhibit A is a letter from our Department of Environmental Quality (DEQ) acknowledging the DPL intent to file the Brownsfields Assessment Grant with the U.S. EPA.

C. Site Eligibility and Property Ownership Eligibility:

1. Basic Site Information:

- a. Name of the site: The name of the site is called Marpi Point Village Homestead.
- b. Address of the site: The Marpi Point Village Homestead Site is located on the northern end of the island of Saipan, CNMI. The site is located on an approximate 62 Hectares or 153 acres adjacent to Makpi Parkway, the main access road to Suicide Cliff.
- c. Current Owner of the site: Department of Public Lands.

2. Status and History of Contamination at the Site:

- a. The site is contaminated with hazardous substances.
- b. The Marpi Point Village Homestead Site's Operational History was one of US Military use. The US Military used this site immediately following capture of the Mariana Islands in World War II to stage ordnance for the impending invasion of Japan. The ordnance storage area was extensive, consisting of hundreds of open revetments with literally several million pounds of US ordnance stored throughout the area. Currently, some parcels of this site (southern part of site) are being used for cattle and piggery grazing. There are no human residences at this site, due to the environmental and hazardous substance concerns.
- c. Following World War II, the ordnance was left in place until the 1950's when the US Army sent teams to the area to dispose of the ordnance. An attempt to blow up the ordnance on site met with catastrophic results, resulting in the entire area being blanketed with unexploded ordnance. Prior to WWII, the area was used to grow sugarcane and may be contaminated with arsenic from pesticide usage.
- d. The site is contaminated with thousands of rounds of Unexploded Ordnance and potentially thousands pounds of explosives from incomplete detonations. The ordnance presents an explosive hazard to future residents of the Homestead project and prior attempts to dispose of the ordnances by mass explosions spread ordnance and explosive powder residue around the site which requires further assessment.

3. Sites ineligible for funding:

DPL affirms that the site is:

- a.) not listed or proposed for listing on the National Priorities List
- b.) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and
- c.) not subject to the jurisdiction custody, or control of the United States government.

4. Sites Requiring Property-Specific Determination:

DPL determines that this site does not require a property specific determination. DPL determines that this site is NOT:

- (a) subject to a CERCLA planned or ongoing removal action;
- (b) subject of a unilateral administrative order, a court order, an administrative order on consent or a judicial consent decree that has been issued to or entered into by the parties, or a facility to which a permit has been issued by the U.S. or a State under the Solid Waste Disposal Act (SWDA), the Federal Water Pollution Control Act, the Toxic Substances Control Act (TSCA), or the Safe Drinking Water Act;
- (c) subject to corrective action under the SWDA and has a corrective action permit or order that has been issued or modified to require the implementation of corrective measures;
- (d) a land disposal unit with respect to which a closure notification under subtitle C of the SWDA has been submitted and closure requirements have been specified in the closure plan or permit;
- (e) a portion of a facility at which there has been a release of polychlorinated biphenyls (PCBs) and that is subject to remediation under TSCA; or
- (f) a portion of a facility, for which portion, assistance for response activity has been obtained under subtitle I of the SWDA from the Leaking Underground Storage Tank Trust Fund established under section 9508 of the IRS Code of 1986

5. Environmental Assessment Required for Cleanup Proposals.

An initial Unexploded Ordnance site survey was completed by DPL in June of 2003 with sampling conducted in selected areas of the project site. The UXO survey confirmed the continued presence of UXO throughout the site and made recommendations that an

environmental site assessment be conducted, commensurate with removal of the vegetation overburden, to fully evaluate the potential contamination.

In addition, a written ASTM E1527-05 Phase one report was completed on October 10, 2007 and a ASTM E1903-97 Phase II assessment is underway.

6. Affirmation not liable for contamination under CERCLA Section 107 and why.

DPL is not potentially liable for contamination at the site under CERCLA Section 107 because DPL, as a unit of State government, does not meet the definition of an owner or operator and did not cause or contribute to the contamination. Pursuant to CERCLA 101(20)(D), the CNMI and the DPL, do not meet the definition of the term, "owner or operator" as title was acquired involuntarily and by virtue of its function as a sovereign. In addition, the CNMI and the DPL did not cause or contribute to the potential release of a hazardous substance at the site.

7. Enforcement Actions

There are no known or anticipated environmental enforcement actions related to this site.

8. Information on Liability and Defenses/Protections

a. Information on Property Acquisition. DPL currently owns the site. The site is currently not being used due to the presence of UXOs and the potential contamination. DPL, through the CNMI Government, acquired the site at the time of the establishment of the Commonwealth on March 24, 1976 under article VIII of the Covenant. The site was acquired from the US Trust Territory Administration upon cessation of the US military government of the island and establishment of the Commonwealth. The lands to which right, title or interest have been transferred from the US Trust Territory of the Pacific Islands to the Commonwealth under Secretarial Order 2989 promulgated by the United States Secretary of Interior on March 24, 1976.

b. Timing of Hazardous Substance Disposal. The disposal of hazardous substance occurred prior to DPL acquiring the site. DPL has not, at any time, arranged for the disposal of hazardous substance at the site or transported hazardous substances to the site.

c. Pre-Purchase Inquiry. No surveys or assessments were conducted as part of the property transfer by Trust Territory government to the CNMI government.

d. Post-Acquisition Uses. A small portion of the site has been used exclusively as agricultural, primarily for the grazing of cattle since transfer of ownership to present.

e. Continuing Obligations. Access to the site is restricted due to the dense jungle growth and use is limited with certain areas authorized for grazing. All human occupation or usage has been restricted. The general public knows to call 911 if a UXO is found. The Department of Public Safety is trained and responds to any calls regarding UXOs.

The DPL confirms our commitment to:

- Comply with all land use restrictions and institutional controls;
- Assist and cooperate with those performing the cleanup and to provide access to the property;

- Comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and
- Provide all legally required notices.

9. **Petroleum Sites:** This does not apply to this grant proposal.

D. Cleanup Authority and Oversight Structure.

1. DPL is working closely with the CNMI's Division of Environmental Quality (DEQ) on this project. DPL will enroll in the DEQ's state response program to obtain their oversight of the cleanup. The DEQ has environmental screening levels that will be used to make certain that the cleanup is protective of human health and the environment. In addition, DPL will hire a qualified environmental consultant to conduct the cleanup. This expertise will be obtained through a competitive procurement process that is consistent with 40 CFR 31.36.

2. Cleanup up activities of adjacent properties is not likely at this site. However, in the event that access to such properties is necessary, access will not be an issue as these properties are also under the jurisdiction and control of DPL.

E. Cost Share

DPL will provide the cost share in the form of labor necessary to perform the programmatic functions of this project. The source of funding for the cost share will be from revenue generate from the leasing of public lands in the CNMI. The annual estimate cost share of direct labor associated with this grant is \$57,000.

The tasks associated with the labor are for eligible and allowable programmatic expenses. These include direct labor to:

1. Obtain environmental contractor services and to manage and oversee the contractors work on the site;
2. Manage project data and information necessary to comply with the terms and conditions of the grant including financial tracking and reporting, quarterly reporting and submission of site specific information such as property profile forms;
3. Conduct community outreach activities including preparing and issuing press releases, given presentations and interviews, and developing and publishing other outreach materials;
4. Conduct physical surveys and mapping of the site and site boundarys in support of site clean-up activities. These activities may include developing 100 by 100 meter grids of the site that will be used for clean-up activities, surveying transects necessary to comply with U.S. Fish and Wildlife requirements with respect to endangered species surveys and the Historic Preservation Office, as necessary;

5. Coordinate with DEQ on clean-up activities and voluntary cleanup program activity requirements; and
6. Conducting reuse and redevelopment planning including participating in pilot design charrettes for the development of the site.

RANKING CRITERIA

A. Assessment Grant Proposal Budget: DPL will use this grant for Program Implementation, Community Outreach, Site Cleanup, and Redevelopment Planning. As illustrated in the table below, the majority of the grant will be used for the Site Cleanup of the Marpi Point Village Homestead Site. Personnel costs in the budget below are the cost share provided by DPL over an anticipated two year grant period.

Budget Category	Task 1	Task 2	Task 3	Task 4	Total
	Program Implementation	Community Outreach	Site Cleanup	Cleanup and Redevelopment Planning	
Personnel	\$ 40,000	\$10,000	\$50,000	\$14,000	\$104,000
Travel	\$ 15,000				\$15,000
Supplies	\$ 1,000	\$ 3,000			\$4,000
Equipment					
Contractual		\$30,000	\$176,000	\$15,000	\$221,000
Other					
TOTAL	\$56,000	\$43,000	\$226,000	\$29,000	\$314,000
Cost Share	\$40,000	\$10,000	\$50,000	\$14,000	\$104,000

Task 1: Program Implementation – DPL will provide staff to manage this project and conduct programmatic (and administrative) activities as a part of the cost share. Expenses in this budget category include travel expenses for training and conferences (e.g., Brownsfields 2006 and other EPA sponsored conferences) related to the project. Keep in mind, travel expenses are higher than other regions due to the geographical location and distance from US Mainland (approximately 6500 miles to San Francisco, CA and 9500 miles to Washington, DC). For example, the average cost of one person, one week, trip to the West Coast (e.g. Region 9 Headquarters in San Francisco, CA) averages \$5,000. Supplies include general office supplies necessary to comply with the terms and conditions of the grant.

Task 2: Community Outreach – A portion of the funds will be used to educate and inform the community and to gain involvement and input in the project. DPL will be using this funding for research, technical assistance and training necessary to inform the community of the progress of the assessment and its impact on the redevelopment plans of this homestead site. DPL plans on using its internet website to provide updates on the project and posting of all reports pertaining to the project.

Because our community is very ethnically diverse, we will use this funding to reach these community members in their respective languages. The US Census for the CNMI identified 89.2% of the population speaks another language other than English with 46.9% speaking a language more frequently than English (2000 US Census). The CNMI has three (3) official

languages; English, Chamorro, and Carolinian. DPL will make sure our community outreach includes informative brochures and materials translated into these languages. Also, DPL plans to document the project along its various stages, both written and video, in the different languages of our community. These documents will be available to the community and to the region. It is our hope that this project will serve as a model for other sites within the CNMI and the surrounding islands in the region.

Task 3: Site Cleanup – DPL will hire a contractor qualified in the removal of unexploded ordnance (UXO). Funds will also be used to survey the boundaries of the site and clear any vegetation, obstruction and overburden. This will include removal of dense jungle growth and other vegetation, rubble, man-made objects (fences, farm material etc). All items will be completely removed from the site to allow full access to the ground surface for the purpose of locating and removing UXO. Removal of the material is absolutely required to clear the UXO .

The bulk of this project is to clear UXO both on the surface and below ground. The surface area of the site will be marked to establish a grid pattern to allow full coverage of the site. This activity will use ground sensing equipment to determine the presence of UXO within the boundaries of the site and to a depth of 30 cm from the surface. The primary investigative elements are:

1. Grid the area into 100 square meter parcels
2. Using a magnetometer, assess each parcel in a sweep pattern for the presence of metal objects on or below the ground surface.
3. Using hand tools or other appropriate equipment, remove all soil surrounding the metal objects such that they can be assessed as a UXO or other object.
4. Note: Assigned personnel will conform to the qualification standards established by the US Army Corps of Engineers standards for UXO Technicians Level II. Site support personnel will be trained in UXO identification and hazards commensurate with the US Army Corps standards for Sweep Personnel.
5. It is a CNMI standard practice that any Unexploded Ordnance encountered is immediately removed from the public access. CNMI has a dedicated Explosive Response Team (XRT) within the Department of Public Safety (DPS) who performs this service. Accordingly, the DPS XRT is a stake holder in this project to remove any hazardous waste UXO generated by the assessment process. CNMI Explosive Response Team (XRT) will provide in-kind services for collection, off site storage and proper disposal of UXOs.
6. After the CNMI Explosive Response Team removes the UXO to the secure off site storage area, additional soil samples and ground water samples will be collected as specified in the approved sampling and analysis plan to determine the presence of residual concentration, if any, of contaminates in soil and ground water.

Task 4: Cleanup and Redevelopment Planning -

After completion of the UXO removal and additional sampling, the data will be compared to the CNMI Division of Environmental Quality's Environmental Screening Levels and the Region IX PRGs to determine if remediation is required. Further sampling and analysis may be conducted as a part of the cleanup and redevelopment planning process. Where feasible, the cleanup and

redevelopment planning will be linked with DPL's 5 Year Capital Improvement Projects (CIP) Master Plan. Public involvement will also be part of the cleanup and redevelopment planning efforts.

B. Community Need:

1. The Commonwealth of the Northern Mariana Islands (CNMI) is a self-governing Commonwealth of the United States. The CNMI includes Saipan, Tinian, Rota, and several other islands. The CNMI's main and largest island is Saipan, located about 100 miles northeast of Guam, about 1,200 miles southeast of Tokyo, and 3,300 miles west of Honolulu. The smallest of the U.S. insular areas, the CNMI consists of 14 islands with a total land area of 183.5 square miles. The target community for this grant will be the population of the CNMI, which will benefit tremendously with this project.

Since becoming a Commonwealth of the United States in 1976, CNMI experienced a population boom in the 1980's and early 1990's due to its own control of labor and immigration. The 1980 population was 16,780 persons. In 1990, the CNMI Census reported the population grew to 43,345 persons. The 1995 mid-decade census results showed a total population of 59,913 persons. With this, non-United States citizens made up 54 percent of the population, with local residents who are United States citizens comprising the remaining 46 percent. The 2000 Census reported the population at 69,221, with non-United States citizens make up of 56.5 percent of the population and local residents comprising the remaining 43.5 percent. Because of this population growth rate, there is a tremendous need and demand for new housing.

A large percentage of low income residents exist on the island of Saipan. According to the 2000 Census, the per capita income is \$9,151 and approximately 7 percent of the households receive public assistance or other supplemental assistance. The median household income was substantially below the median household income relative to Guam and the United States. The median household income was merely \$22,898, whereas in Guam it was \$39,317, in Hawaii it was \$51,546 and in the United States \$41,994. In comparison, the median household income in the CNMI ranges between 42 percent less than the Guam's rate and over 90 percent of the average U.S. rate. The housing is approximately 68 percent rental and over 31% of the housing was constructed in the 1980's.

Additionally, the poverty statistics of the CNMI relative to Guam and the rest of the insular areas are relatively high (2000 Census). For example, 46 percent of individuals residing in the CNMI were living below the poverty line. In comparison, 20 percent of Guam residents, 10.7 percent in Hawaii, and 9.2 percent of U.S residents are living below the poverty line. Shown below is some statistics from the 2000 census data for CNMI, Guam, Hawaii and the United States. The data emphasizes the economic distress of the CNMI in comparison to the rest of the United States.

2000 Census Data	CNMI	GUAM	HAWAII	United States
Population	69,221	154,805	1,211,537	281,421,906
Median Household Income	\$22,898	\$39,317	\$51,546	\$41,994

Per capita income-	\$9,151	\$12,722	\$21,525	\$21,587
Individuals below poverty line	46.0%	20.0%	10.7%	9.2 %
Unemployment rate*	15.9%	34.4%	3.9%	3.7%

Sources: Information above and figures used were obtained from the 2000 U.S. Census.

* Unemployment rate lower than Guam due to the influx of guest workers (non-residents).

2. Developing the Marpi Point Village Homestead Site will reap long-term benefits to the CNMI, its economy and the people. The indigenous people of the CNMI, consisting of primarily Chamorros and Carolinians are eligible for public homestead land grants so they may own real estate and build a home. Currently, there are over 4,000 qualified homestead applicants waiting for DPL to issue homestead lots. With the proper development of the Marpi Point Village Homestead Site, over 500 individuals and families could be issued a piece of property to build their new family home and avail their current housing for the inflow of others moving to the CNMI.

The proper assessment and clearance of hazardous contaminants, primarily the UXO, will allow a community to be developed in an area which is currently under-utilized land and surrounded by dense jungle. A new area of the island will reap economic benefits with the developing of a new community. DPL successfully developed a similar project (without as serious of a UXO dilemma) with the Kagman Village Homestead Site. There were 1,811 homestead lots issued in Kagman and 1,500 homes built since the area was redeveloped. With an average cost of \$50,000 per home, DPL anticipates an economic growth of over \$25 Million from the Marpi Point Village Homestead Site just from new home construction. This does not take into account the multiplier effect it will have. New job opportunities and new investments will benefit the entire target population, especially those displaced or unemployed, with employment prospect. Consequently, with this growth, the area will have needs for new schools and other commercial activities to serve this new redeveloped area. The overall economic impact of the Marpi Point Village Homestead Site is anticipated to be several times the value of the homes.

3. Other public lands designated for the homestead program, approximately 74 acres on 3 other sites, are considered FUDS sites and/or contaminated areas from UXOs left during and after the war. Because of fiscal constraints, DPL has not been able to complete these assessments necessary to redevelop these lands. Future Brownfields Assessment funding will allow us to address these areas and regain access to public lands currently inaccessible due to the contamination.

In addition, public land sites that have been leased (long term) and are returning to DPL are potentially contaminated with both hazardous and petroleum contaminants. Prior to re-issuing leases to investors, DPL will need to assess these sites and other vacant public lands for any contaminants. DPL is working closely with DEQ to generate an inventory of such Brownsfields sites. DPL is the recipient of a previous petroleum assessment grant and is using these funds to conduct 12 Phase I assessments, with additional Phase I and II assessments being planned. In this partnership with DEQ, DPL is gaining significant experience necessary to evaluate sites for environmental contamination and Brownfields redevelopment.

Thus, without proper assessment to these potential Brownfields property, there will be many economic, health, and environmental impacts detrimental to the community. Therefore, DPL is conducting ESA Assessments on these public lands to support an environmentally safe place to grant homesteads lots and/or lease properties to investors. Without an assessment, these Brownfields sites could possibly contaminate our precious drinking water sources. For those properties near the lagoon or surface water areas (the shoreline), hazardous contaminants could affect our coral reefs and fish stock supply. DPL strives to promote new investments into the CNMI as an environmentally safe place to invest.

C. Sustainable Reuse of Brownsfields.

1. DPL will host workshops to educate homesteaders, developers and construction workers on pollution prevention, energy conservation and resource reduction techniques for use in home construction and landscaping. Workshop co-sponsors, the Northern Marianas Housing Corporation (NMHC), Department of Public Works (DPW), and the Governor's Housing Task Force, have resources to encourage homesteaders to use energy efficient resource consumption activities when building homes. The Department of Land and Natural Resources (DLNR) provides FREE native plants for re-planting on homestead property that will aid in reducing energy consumption and retain storm water runoff. Also, DPL is working with DPW - Solid Waste Division to reuse the land clearance debris (trees, shrubs, etc.) by expanding their compost program with product made available to the homesteaders. Pollution prevention and reduction in resource consumption will be part of DPL's public outreach, cleanup planning, and redevelopment coordination aspects of this grant.
2. The plan for the site includes making over 500 lots available for homestead applicants. After receiving a lot, the homesteader must construct a house within three years in order to consummate the ownership of the lot. This will result in a significant number of new jobs and an expanded tax base. The value of the homes is estimated at over \$25 million dollars. The new community will include parks and green space in the buffer area. Also, with the growth of a new community, schools, community centers, and commercial centers will be developed furthering the economic benefit of the project.
3. The redevelopment planning part of this proposal will seek public input to make this new community vibrant. Community input will assist in the location and number of schools, parks, community centers and other assets of this new homestead site. Community input will also be used to determine the appropriate density of housing and whether the number of homestead lots can be increased.

D. Creation and/or Preservation Greenspace/Open Space or Nonprofit Purpose.

The Marpi Point Village Homestead Site is located within walking and biking distances to recreational activities on the Island. DPL will incorporate greenspace as a buffer for the residential homestead village from Makpi Parkway and future commercial areas. The buffer will link to existing biking and walking trails near the site leading to recreational activities on the

Island. The redevelopment planning part of this grant will seek public input on the number and size of other parks to be included in this homestead area.

The long term land use plan for the CNMI designated certain areas of land for homestead and preserves other areas as refuge areas and bird sanctuary. Completion of this project will further the goals of that plan.

Once the site has been assessed, cleared of any hazardous contaminants, UXOs and declared safe for human use and activities, DPL will go forward in its redevelopment plans to create homestead lots for its applicants. Included in the plans are sites strategically located for greenspace preservation and construction of public access parks within the site and surrounding areas. DPL is committed to helping and preserving our greenspace areas surrounding this site. Once the parks and greenspace has been developed, DPL will designate (similar to deeding) these properties to DLNR which, according to CNMI Public Law 14-24 (1CMC, section 2701 and 2702), is responsible for the maintenance at all CNMI's public parks. Through this designation, DLNR – Division of Parks and Recreation assumes responsibility for the long-term management and care of this greenspace and park areas. Funding for the long-term management, care, and preservation will be provided by the CNMI's General Fund through annual appropriation of funds to DLNR.

E. Pre-Award Community Notification

1. This site is the subject of a previous site specific assessment grant. As such, the community is aware of the proposed plans for the cleanup and redevelopment of this site through activities conducted under that grant. The local newspapers ran stories about this site and the proposed activities. In addition, DPL and DEQ staff made presentations to several community organizations including the Chamber of Commerce and the Rotary club about this project. DPL will issue a press release to the local newspapers, radio, and television to provide the public with the opportunity to review and comment on this specific proposal. Comments from the public will be accepted in writing, by email and verbally. DPL will review all comments received and modify the proposed plans as necessary. Individuals that identify themselves with their comments will receive an individual response from DPL explaining how their comment was addressed. A copy of the proposal, all comments and a copy of the response to comments will be place on DPL's website for the public to review.
2. The local press releases are picked up as news stories by the newspapers, radio and television. As such they provide the broadest coverage out to the community, and are the primary vehicle for the community to receive information about local activities and events. The local newspapers are also available on the internet providing access to an even broader audience. Due to our diverse community and large population speaking other languages other than English, DPL will ensure that this notice is available in the three official languages of the CNMI.
3. Comments on the proposal will be accepted over a thirty day period. In addition to the press release, DPL will schedule presentations at community organizations to explain the proposal, to encourage and solicit comments.

4. Comments will be reviewed to determine the need to modify the proposal or to consider additional information. Substantive comments and significant issues will be raised to management attention for further review. All comments will be responded to in writing and a copy of the response will be placed on the DPL website.

F. Ongoing Community Involvement.

1. Community involvement has been and will continue to be the foundation of DPL's approach to create sound public policy and build support for the project. As indicated earlier in our budget proposal, a portion of the funds will be used to educate and inform the community and to gain involvement and input in the project, at all stages of the project. DPL will continue to issue press releases informing the community and inviting their input on the cleanup and/or reuse plans. Along with its press releases, updates on the project will be posted on its internet website with the opportunity for public comments. Again, due to our diverse community and large population speaking other languages other than English, DPL will ensure that this information is relayed to them in their native languages.
2. To ensure appropriate and sustainable cleanup of Brownfields, DPL is actively working and receiving technical support from DEQ. DPL will continue to build partnerships with other agencies and organizations to ensure utmost participation and input on the project. An example would be DPL's working relationship with DPS with the removal of UXOs from other sites and this site at Marpi Point. DPS will provide security and assurance of UXOs gathered as a result of the assessment project. DPL is also partnering with the Northern Marianas Housing Corporation (NMHC), Department of Public Works (DPW), and the Governor's Housing Task Force, and the Department of Land and Natural Resources (DLNR) on the sustainable cleanup and redevelopment of the Marpi Point Village Homestead Site.

Again, with our community outreach program activities, DPL and its partners will be educating and seeking input from the community throughout the project.

3. As mentioned earlier and according to the 2000 U.S. Census, 89.2% of the population speaks another language other than English with 46.9% speaking a language more frequently than English. Therefore, DPL will ensure that this information is relayed to them in their native languages through television programs in their language and in printed brochures and materials.

DPL believes that by using a wide array of communication mechanisms, community involvement and understanding will lead to positive inputs and result. The community has been and will continue to be informed of DPL's intentions, progress, and need for community involvement through public press releases, posted notices at public facilities, published notices in the local newspapers, and on DPL's website. DPL will also conduct open public hearings to present the progress of the project, request to present our progress to the Chamber of Commerce and Rotary Club, and include our progress in our DPL quarterly newsletter that is distributed throughout the community.

4. The following is a list of individuals and their community-based organizations that involved in this project.

Organization	Contact Person	Phone Number	Organization's Activities
Chamber of Commerce	Juan T. Guerrero, President Christine Park, Exec. Director	(670) 233-7150	Business & Economic Planning and Development Group
Rotary Club	Patrick Calvo, President	(670) 234-6120 (670) 287-0516	Business Interest Group - Community Humanitarian Outreach and Services
Mariana Islands Nature Alliance	Frances Castro, Chairperson	(670) 664-8570	Non-profit environmental resource conservation and awareness outreach
Beautify CNMI	Angelo Villagomez	(670) 236-0894 (670) 236-0895	Community based coalition for the Environment. Focus on restoration projects, cleanups and recycling, antilitter, policy development (legislation) and community outreach

G. Reduction of Threats to Human Health and the Environment

1. Unexploded ordnance and compounds within the ordnance such as trinitrotoluene, tetryl, and tritonal present significant safety and health hazard to humans. Sparks, fire and heat can lead to detonation which may cause severe physical injury including death. Inhalation of powders may cause nervous system irregularities. The project funds will be used to pay for qualified contractors, equipped with UXO trained surveying crews, earthmoving equipment, and professionals with vast knowledge in explosives to locate and remove the UXOs. Once this area is cleared from these human and environmental threats, development of the Marpi locale will immediately follow.
2. DPL has a very close working relationship with the Department of Environmental Quality (DEQ), the environmental authority of the CNMI. The DEQ assisted in the development of the proposal and will assist in the review of work plans and reports as a part of implementing this project. At the successful conclusion of this project, DEQ will issue a no further action letter for this site. To protect public health, the CNMI Department of Public Safety (DPS) has a dedicated Explosives Response Team (XRT). The XRT is committed to support this project with the removal, storage and proper disposal of the UXOs. (See attached support letter).
3. The site will be cleared of any vegetation, obstruction and overburden to allow full access to the ground surface for locating and removing UXO. The ground surface area of the site will be marked to establish a grid pattern to allow full coverage of the site. This activity will use

ground sensing equipment to determine the presence of UXO within the boundaries of the site and to a depth of 30 cm from the surface. The primary cleanup elements are:

- a. Grid the area into 100 square meter parcels
- b. Using a magnetometer, assess each parcel in a sweep pattern for the presence of metal objects on or below the ground surface.
- c. Using hand tools or other appropriate equipment, remove all soil surrounding the metal objects such that they can be assessed as a UXO or other object.
- d. Note: Assigned personnel will conform to the qualification standards established by the US Army Corps of Engineers standards for UXO Technicians Level II. Site support personnel will be trained in UXO identification and hazards commensurate with the US Army Corps standards for Sweep Personnel.
- e. It is a CNMI standard practice that any Unexploded Ordnance encountered is immediately removed by the DPS ERT from the public access. CNMI has a dedicated Explosive Response Team (XRT) within the Department of Public Safety (DPS) who performs this service. Accordingly, the DPS XRT is a stake holder in this project to remove any hazardous waste UXO generated by the assessment process. CNMI Explosive Response Team (XRT) will provide in-kind services for collection, off site storage and proper disposal of UXOs.
- f. After the CNMI Explosive Response Team removes the UXO to the secure off site storage area, additional soil samples and ground water samples will be collected as specified in the approved sampling and analysis plan to determine the presence of residual concentration, if any, of contaminants in soil and ground water.

The estimated cost to remove any UXO remaining after completion of the Phase II Environmental Site Assessment is \$226,000 at this site.

H. Leveraging of Additional Resources

1. The Department of Public Lands designated 153 acres in the northern end of Saipan for a village homestead called the Marpi Point Village Homestead Site. Being at an early stage of development, it is difficult to fully define the anticipated financial needs of the project. However, the Division of Planning, under DPL, estimated the project would cost \$5,828,226 to complete including infrastructure costs, based on past projects on the island. The DPL approved this figure and has identified future funds from its general fund for the project. DPL has committed and will continue to commit the time and hours (salary and benefits) spent on the project from personnel of the Division of Planning as in-kind contribution for the project. Also, DPL will contribute its equipment and resources whenever needed to see the project completed. An initial topography and perimeter study was completed in the early 2000. Also, knowing that the site was a formerly used defense site, a UXO survey was conducted to estimate the extent of the UXO contaminants. It was this study that recommended an extensive assessment to be conducted. This Brownfields Assessment funds will assist DPL realize the completion of the project by fully assessing the potential environmental risks to the community.
2. DPL seeks to leverage its current resources and will continue to seek future funding from the CNMI Government, Federal Government and the private sector that can assist with the

project. DPL has the support and assurance from the Department of Public Safety to remove UXOs from the site and secure the safety of the community.

The private homesteaders will be contributing up to \$25 million dollars into construction of homes. With the support (such as loans to homeowners) of the Northern Marianas Housing Corporation and the Northern Mariana Islands Retirement Fund (NMIRF), financial assistance will be extended to the homesteaders. DPL will seek the assistance of the Marianas Public Lands Trust (MPLT), its investment arm, to extend other financial assistance, as well.

This project is viewed as a community project which will need to continue its relationship with the central government and other government agencies. With support from these partnerships, DPL will seek over \$3 million in Capital Improvement Project funding from the CNMI government for the infrastructure needs of the project. Northern Marianas Housing Corporation (NMHC) will seek Community Development Block Grants (CDBG) for community and recreational facilities at the site. Also, DPL will request the assistance from the MPLT to fill any remaining funding gaps for the project, such as infrastructure, home loans, and greenspace development.

The previous Assessment Grant, this cleanup grant and the above mentioned funding sources are necessary for the success of the project and the redevelopment of the site. Without these resources, the project site will be continued to plague the community and perpetuate the environmental hazards and risks that affect the community. The awarding of an EPA Brownfields Cleanup Grant will allow DPL to move forward with its project plans and provide many residents with the dream of a homestead lot to build their family home.

I. Programmatic Capability.

1. Mr. Franz Reksid will serve as the project manager for the project and the grant. Mr. Reksid is a Special Assistant to the Secretary for DPL and will manage all phases of the grant. He has a wealth of experience dealing with Federal Grants and DPL is confident that these experiences will enable DPL to manage and oversee all phases of the work under this grant. Mr. Reksid has been trained and worked with Federal Grants for over 30 years, including managing grants from EPA dating back to the 1970's. He has also administered Federal Grants from the US Department of Health and the US Department of Health & Human Services. Mr. Reksid also served as Chairman of the Trust Territory Environmental Protection Board, responsible for all environmental issues in the Pacific Trust Territories (Republic of Palau, CNMI, the Federated States of Micronesia and the Republic of the Marshalls).

DPL prepared a Request for Proposal/Qualifications, under the DPL Competitive Procurement Policies (adopted on July 29, 2002 and amended on January 2, 2003), to acquire a suitable environmental consultant and expertise to conduct the technical phases of the project. DPL has a contract in place with the highest qualified contractor to conduct the Phase I and II Environmental Site Assessment for this site. Contingent on funding, this contract includes requirements for the contractor to conduct site cleanup including to remove

all UXO at the site. DPL is assured from DEQ to be available for technical support, including cleanup oversight throughout the project. Also, DPS will provide security, storage and disposal of UXOs gathered as a result of the site cleanup project.

2. DPL conducts an annual audit and has maintained a good record of compliance with managing its finances. It has not had any adverse findings from its audits detrimental to its finances. Also, there are no adverse audit findings from an OMB Circular A-133 Audit. DPL is not presently, nor has been subject to comply with special "high risk" terms and conditions associated with agency regulations implementing OMB Circular A-102. Currently, DPL is the recipient of two EPA Brownfields Assessment grants for a total of \$550,000 (FY 2006). All feedback from the EPA project officer on the management of these grants has been positive.
3. Currently, DPL is the recipient of two EPA Brownfields Assessment grants for a total of \$550,000 (FY 2006). One grant is for conducting community wide petroleum assessments (\$200,000). The second grant is a site specific hazardous substance grant for this site (\$350,000). All feedback from the EPA project officer on the management of these grants has been positive. DPL is current with all reporting requirements included in the terms and conditions of the grant. This includes quarterly reporting, brownfields reporting measures and annual financial status reporting.

Under the petroleum grant awarded October 2006, twelve environmental site assessments are in progress and more than half of the funding is obligated to conducting the work plan activities. The remaining funds in this petroleum assessment grant will be used to conduct Phase II environmental site assessments or additional Phase I environment site assessments.

Under the hazardous substance grant awarded October 2006, the phase I environmental site assessment for this site is complete and the Phase II environmental site assessment is underway and should be completed in six to nine months. In addition, a health monitoring study on incidences of injury associated with UXOs is underway. The data collection phase is nearly complete and the information will be further analyzed for use in making public service announcements. All \$350,000 of this grant has been committed to work plan activities. Both brownfields grants are on schedule to achieving the significant results projected by the workplans.

4. DPL is committed to tracking and measuring the progress towards achieving the expected project outputs and outcomes. DPL has an adequate number of compliance officers who will work in collaboration with staff at DEQ and DPS to establish monitoring and tracking of UXO collected at site including maintaining records of materials recovered and disposed of. Monitoring and tracking of UXO is a high priority necessary prior to reuse of the site for a village homestead for the first home owners.

DPL also has a strong financial division that is capable of tracking individual homestead lots to monitor the owners progress in building their home once the property is assigned. This monitoring will enable DPL to tract with a relative degree of high accuracy the leveraged dollars at the site as a whole.



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



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October 5, 2007

Environmental Management Support, Inc.
Attn: Mr. Don West
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910

RE: DPL FY2008 Brownfields Assessment Grant – Community Wide Assessment for
Petroleum, Saipan CNMI USA
DPL FY2008 Brownfields Hazardous Substances Cleanup Grant – Marpi Point
Homestead Site, Saipan CNMI USA

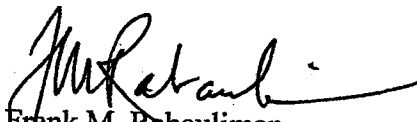
Dear Mr. West:

The Commonwealth of the Northern Mariana Islands Division of Environmental Quality (DEQ) acknowledges and supports the proposal by the Department of Public Lands (DPL) in its plan to apply for Federal Funds for a Community Wide Assessment Grant for Petroleum and a Hazardous Substances Cleanup Grant for the Marpi Point Homestead.

At the present time, the CNMI is experiencing challenging economic times with decreasing economic investments and declining sources of government. The DEQ sees tremendous benefit by providing the opportunity to access the Federal Funds to successfully assess, cleanup and redevelop brownfields in the CNMI that would otherwise remain idle and undeveloped.

Accordingly, DEQ endorses and recommends approval of the Department of Public Lands Community Wide Assessment Grant for Petroleum and Brownfields Hazardous Cleanup Grant for the Marpi Point Homestead site.

Sincerely,


Frank M. Rabauliman
Director