



Final Environmental Assessment

# **Le'Atele Elementary School Buildings Replacement**

Fagasa, American Samoa

Territorial Office of Fiscal Reform

American Samoa Department of Education

*August 2013*



**FEMA**

THIS DOCUMENT WAS PREPARED FOR



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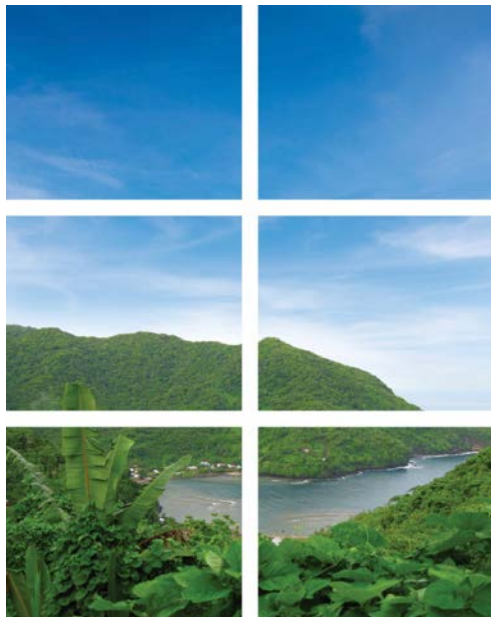
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COVER PHOTO: PROJECT SITE ACROSS FAGASA BAY



FINAL ENVIRONMENTAL ASSESSMENT

# LE'ATELE ELEMENTARY SCHOOL BUILDINGS REPLACEMENT

FAGASA, AMERICAN SAMOA

TERRITORIAL OFFICE OF FISCAL REFORM  
AMERICAN SAMOA DEPARTMENT OF EDUCATION

FEMA-1859-DR-AS, PW 193

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# Acronyms and Abbreviations

|                 |  |
|-----------------|--|
| AMSL            | above mean sea level                                       |
| APE             | Area of Potential Effects                                  |
| ASCMP           | American Samoa Coastal Management Program                  |
| ASDMWR          | American Samoa Department of Marine and Wildlife Resources |
| ASDOC           | American Samoa Department of Commerce                      |
| ASDOE           | American Samoa Department of Education                     |
| ASDPW           | American Samoa Department of Public Works                  |
| ASEPA           | American Samoa Environmental Protection Agency             |
| ASG             | American Samoa Government                                  |
| ASHPO           | American Samoa Historic Preservation Office                |
| ASPA            | American Samoa Power Authority                             |
| BFE             | Base Flood Elevation                                       |
| BMP             | best management practice                                   |
| CAA             | Clean Air Act  |
| CEQ             | Council on Environmental Quality                           |
| CFR             | Code of Federal Regulations                                |
| CH <sub>4</sub> | methane  |
| CO              | carbon monoxide  |
| CO <sub>2</sub> | carbon dioxide   |
| CWA             | Clean Water Act  |
| CZMA            | Coastal Zone Management Act                                |
| EA              | Environmental Assessment                                   |
| ECE             | early childhood education                                  |
| EFH             | Essential Fish Habitat                                     |
| EO              | Executive Order  |
| ESA             | Endangered Species Act                                     |
| FEMA            | Federal Emergency Management Agency                        |



|                   |  |
|-------------------|--|
| FFE               | finished floor elevation                                 |
| FIRM              | Flood Insurance Rate Map                                 |
| GCR               | General Conformity Rule                                  |
| GHG               | greenhouse gas   |
| LUP               | Land Use Permit  |
| MBTA              | Migratory Bird Treaty Act                                |
| MSA               | Magnuson-Stevens Fishery Conservation and Management Act |
| NAAQS             | National Ambient Air Quality Standards                   |
| NEPA              | National Environmental Policy Act                        |
| NMFS              | National Marine Fisheries Service                        |
| NO <sub>2</sub>   | nitrogen dioxide   |
| NPDES             | National Pollutant Discharge Elimination System          |
| NRHP              | National Register of Historic Places                     |
| N <sub>2</sub> O  | nitrous oxide  |
| O <sub>3</sub>    | ozone  |
| PA                | Public Assistance  |
| PM <sub>2.5</sub> | particulate matter less than 2.5 microns in diameter     |
| PM <sub>10</sub>  | particulate matter less than 10 microns in diameter      |
| PNRS              | Project Notification and Review System                   |
| RCRA              | Resource Conservation and Recovery Act                   |
| SIP               | State Implementation Plan                                |
| SO <sub>2</sub>   | sulfur dioxide   |
| TOFR              | Territorial Office of Fiscal Reform                      |
| U.S.C.            | U.S. Code  |
| USACE             | U.S. Army Corps of Engineers                             |
| USEPA             | U.S. Environmental Protection Agency                     |
| USFWS             | U.S. Fish and Wildlife Service                           |

# Executive Summary

## Introduction

The American Samoa Department of Education (ASDOE) has applied to the U.S. Department of Homeland Security's Federal Emergency Management Agency (FEMA) for funds to replace three buildings at the Le'Atele Elementary School in Fagasa Village that were severely damaged by the September 29, 2009, tsunami that caused major devastation in the United States territory of American Samoa. Approval of this funding is a federal action subject to the National Environmental Policy Act of 1969 (NEPA). FEMA has prepared this Environmental Assessment (EA) in compliance with NEPA.

The Le'Atele Elementary School grounds comprise approximately 2.4 acres adjacent to Fagasa Bay at the western end of the village of Fagasa. The school's previously existing administration building, early childhood education (ECE) building, and kitchen/cafeteria building were located between 100 and 215 feet from the shoreline and were damaged beyond repair. These structures have since been demolished because they were deemed a public safety hazard. Temporary structures were erected to accommodate some of the displaced services as an interim solution. The EA examines the potential environmental effects of constructing and operating permanent replacement facilities (the Proposed Action).

## Proposed Action

The Proposed Action is to replace the disaster-damaged (and subsequently demolished) administration building, ECE building, and kitchen/cafeteria building with a singular two-story multiuse building constructed to current codes and standards. The new structure would be located 400 feet from the shoreline on a portion of what is now an approximately 7,000-square-foot level field of turf grass used as an informal play area. The proposed building location would be southwest of and immediately adjacent to the school's existing two-story classroom building.

The proposed location of the replacement building is within FEMA Flood Zone AE, indicating high risk areas with a 1 percent or greater chance of flooding, with a defined base flood elevation (BFE). Because the structure is located in Zone AE, the finished floor elevation (FFE) of the lowest floor must be elevated at or above the BFE per federal and American Samoa floodplain management requirements.

## Environmental Analysis and Mitigation

The EA presents an examination of the Proposed Action's environmental effects with respect to the following issue areas: air quality and greenhouse gas emissions; water resources; coastal

resources; biological resources; cultural resources; geology, soils, and seismicity; land use and planning; transportation; noise; utilities; socioeconomics/environmental justice and public safety; and visual resources.

The EA identifies several potential adverse effects, but concludes that effective implementation, enforcement, and monitoring of proposed best management practices (BMPs) and project-specific mitigation measures would prevent the Proposed Action from resulting in any adverse effects. As discussed in the respective sections of Chapter 4, BMPs or mitigation measures are identified for the following issue areas: air quality and greenhouse gas emissions; water resources; coastal resources; biological resources; cultural resources; soils; transportation; noise; and public safety. With effective implementation, enforcement, and monitoring of proposed BMPs and mitigation measures, the Proposed Action would not result in adverse environmental effects.

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# 1.0 Introduction

On September 29, 2009, a major earthquake occurred beneath the Pacific Ocean in the Tonga Trench, generating a tsunami that caused major devastation in the United States (U.S.) territory of American Samoa (American Samoa), 120 miles to the northeast. A Presidential Disaster (FEMA-1859-DR-AS) was declared, authorizing federal assistance.

Through the American Samoa Territorial Office of Fiscal Reform (TOFR), the American Samoa Department of Education (ASDOE) has applied to the U.S. Department of Homeland Security's Federal Emergency Management Agency (FEMA) for funds to replace three buildings severely damaged by the disaster at the Le'Atele Elementary School in Fagasa Village (the Proposed Action). Approval of this funding is a federal action subject to the National Environmental Policy Act of 1969 (NEPA); thus FEMA has prepared this Environmental Assessment (EA) in compliance with NEPA.

American Samoa is a Pacific Ocean archipelago located approximately 2,600 miles south-southwest of Hawaii and 1,800 miles north-northeast of New Zealand (Figure 1.1). It consists primarily of five volcanic islands and two coral atolls. The Proposed Action is located on Tutuila, by far the largest island of the territory (Image 1). Tutuila is approximately 54 square miles in area and home to approximately 90 percent of the population. American Samoa is an unorganized and unincorporated U.S. territory. As such, American Samoa is partially self-governing and administered by the Office of Insular Affairs, U.S. Department of the Interior. Unlike citizens of other U.S. territories, American Samoans are noncitizen U.S. Nationals.

FEMA proposes to provide federal financial assistance to the American Samoa TOFR pursuant to Section 406 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1988 (42 U.S. Code [U.S.C.] § 5172) and Title 44 Code of Federal Regulations (CFR) § 206.

FEMA is the lead agency responsible for the preparation of this EA. This EA has been prepared according to the requirements of NEPA, the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR Parts 1500–1508), and FEMA's implementing regulations (44 CFR Part 10).

The EA process provides steps and procedures to evaluate the potential environmental, social, and economic impacts of the Proposed Action and its alternatives. These potential impacts are



Source: American Samoa Department of Commerce Web Portal; FEMA

**Figure 1.1**  
**Le'Atele Elementary School Location Map**

measured by their context and intensity, as defined in the CEQ regulations. This process includes an opportunity for the public and local, territorial, and federal agencies to provide input and/or submit comments.



Image 1: Le'Atele Elementary School (circled in red) is located on Fagasa Bay at the base of Fuaau Ridge.

Any change to the scope of work for the Proposed Action and its alternatives would require reevaluation for compliance with NEPA, other laws, and Executive Orders (EOs). This EA does not directly address all federal, American Samoa Government (ASG), and local requirements. Acceptance of federal funding requires the recipient (TOFR and ASDOE) to comply with all federal, ASG, and local laws. Failure by TOFR and ASDOE to obtain all appropriate federal, ASG, and local environmental permits and clearances may jeopardize federal funding.

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# 2.0 Purpose and Need for Proposed Action

## 2.1 Purpose

The objective of the FEMA Public Assistance (PA) Program is to provide assistance to state, territorial, tribal and local governments, and certain types of private nonprofit organizations so that communities can quickly respond to and recover from major disasters or emergencies declared by the President. Through the PA Program, FEMA provides supplemental federal disaster grant assistance for debris removal; emergency protective measures; and the repair, replacement, or restoration of disaster-damaged, publicly owned facilities and the facilities of certain private nonprofit organizations. The PA program also encourages protection of these facilities from future disaster events by providing assistance for hazard mitigation during the recovery process. The purpose of the project is to provide PA funding to the grantee, TOFR, and consequently the sub-grantee, ASDOE.

## 2.2 Need

The September 29, 2009, earthquake, tsunami, and flooding disaster (FEMA-1859-DR-AS) caused widespread destruction in coastal areas of American Samoa during an incident period lasting until October 6, 2009. Le'Atele Elementary School in Fagasa Village is located adjacent to the shoreline of Fagasa Bay and sustained significant damage (Image 2).



Image 2: View facing southwest shows the sites of the demolished structures in the foreground at left and right.

The approximately 2.4 acre campus increases in elevation from approximately 7 feet to 13 feet above mean sea level (AMSL) as it extends inland to the southwest. Thus, parts of the campus bore the full force of an approximately 12- to 18-foot-high tsunami wave and three school buildings suffered severe structural damage.

The three damaged buildings were located between 100 and 215 feet from the shoreline. The 880-square-foot administration building constructed in 1966, the 1,120-square-foot early childhood education (ECE) building constructed in 1964, and the 1,502-square-foot kitchen/cafeteria building constructed in 1965 were all damaged beyond repair. The disaster event caused walls and doors to break away, floors to be washed out, roofs to collapse, and electrical systems to be destroyed. Due to the extent of the damages and the hazard to public safety, the disaster-damaged buildings were razed and three temporary structures were erected at the center of the campus to house some of the displaced school services (Image 3). Additional school buildings were affected by the tsunami but did not suffer severe damage beyond repair and remain intact.



Image 3: Temporary structures were erected after the disaster to restore partial capacity.

Action is needed to restore the function of the facilities destroyed by the disaster. Restoring the function of these facilities would enable ASDOE to operate Le'Atele Elementary School at full capacity and provide students with administrative, ECE, food preparation, and cafeteria services at pre-disaster levels. Any replacement facilities must be protected from future flood hazards as required by FEMA's regulations and the American Samoa Government (ASG).

# 3.0 Alternatives Analysis

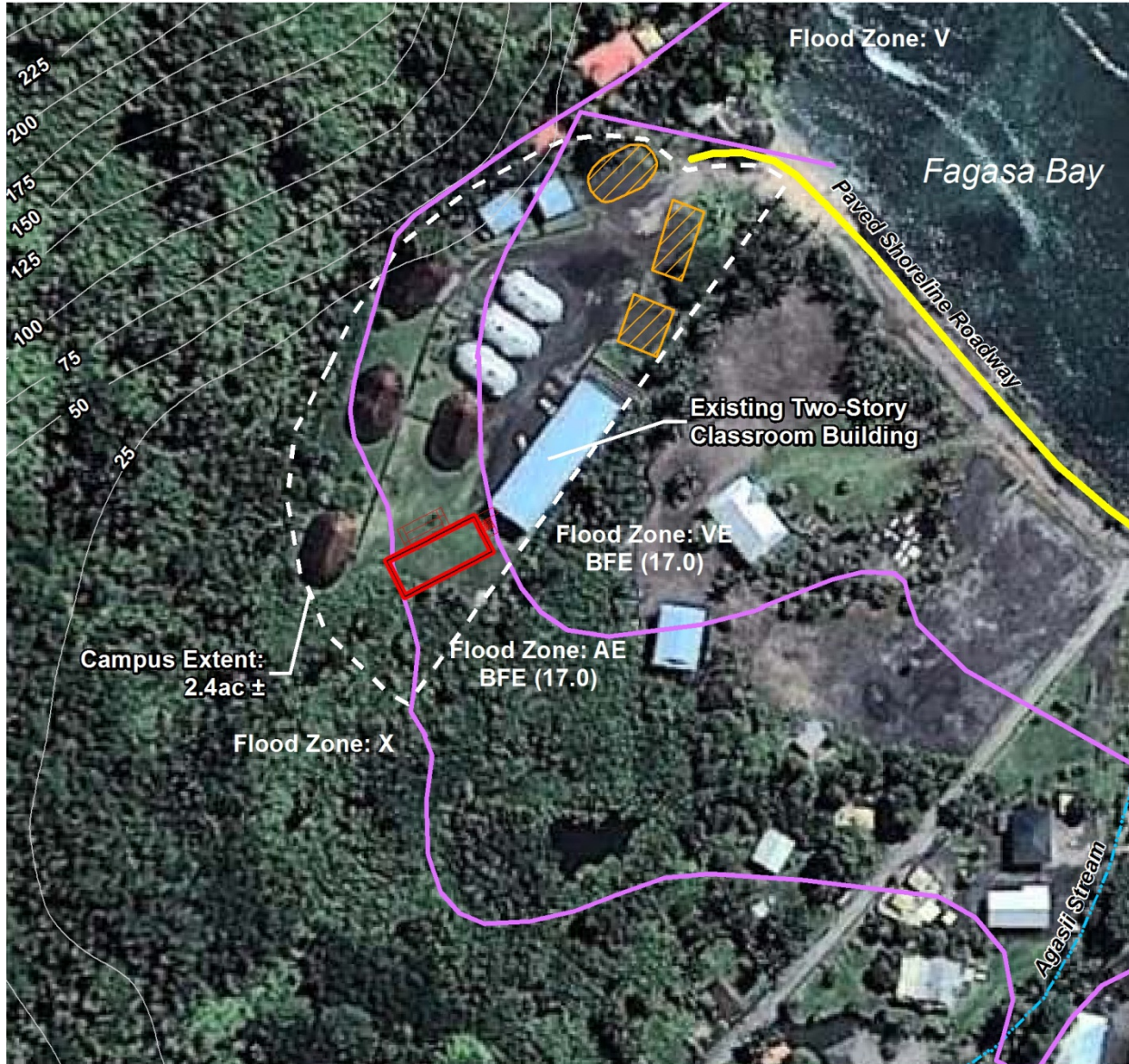
The Le'Atele Elementary School grounds comprise approximately 2.4 acres adjacent to Fagasa Bay at the western end of the village of Fagasa (Figure 3.1). To the west, the grounds abut a drainage ditch running along the base of the steep slope of Fuaau Ridge. This steep slope extends around to the south at the rear of the campus at the base of Taumata Mountain. To the east, the grounds border a low density residential area of informally arranged single-family detached homes. Near the Bay at the north end of the grounds, the previously existing administration building, ECE building, and kitchen/cafeteria building were damaged beyond the scope of repair by the disaster and have since been demolished because they were deemed a hazard to public safety. Temporary structures were erected at the center of the campus to accommodate some of the displaced services.

Three alternatives were initially considered to restore the school facilities to pre-disaster condition and capacity: reconstruct the buildings at the original locations configured within the previous foundation footprints, construct a replacement building(s) at a different location within the school grounds, or take no action to change the current conditions. The alternative of reconstructing the buildings in the original locations was removed from consideration, as discussed below in Section 3.1. Accordingly, the remaining two alternatives carried forward for consideration in this EA are the No Action Alternative (Alternative 1) and the Proposed Action (Alternative 2), as discussed below in Sections 3.2 and 3.3, respectively.

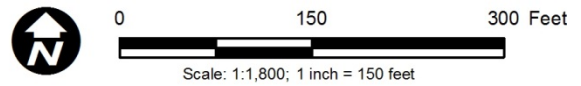
## 3.1 Alternative Not Carried Forward

An alternative was initially considered that entailed reconstructing the three buildings destroyed by the disaster at the original pre-disaster location within the previous footprints. However, the three buildings were located within FEMA Flood Insurance Rate Map (FIRM) Flood Zone VE (Zone VE). High risk coastal areas with a 1 percent or greater chance of flooding (100-year flood) that are subject to an additional hazard of storm wave action are encompassed by V Zones. Furthermore, in VE Zones the base flood elevation (BFE) derived from in depth analysis is indicated at selected intervals on the FIRM to provide additional detail (FEMA 2006).

FEMA's regulations implementing Executive Order (EO) 11988, Floodplain Management, prohibit the Agency from funding new construction in Zone VE that is not functionally dependent on water or facilitates open space use. The definition of new construction in 44 CFR 9.4



Source: American Samoa Department of Commerce Web Portal; NFIP Flood Insurance Rate Map Number 6000010078C, Panel 78 of 260; American Samoa Department of Education; Google Earth Image Date 4/11/2012; AECOM



**Figure 3.1**  
**Le'Atele Elementary School Project Site**

includes “the replacement of a structure of facility which has been totally destroyed.” FEMA considers a structure or facility to be “totally destroyed” when its repair costs equal or exceed 90 percent of its replacement costs. Therefore, this alternative was considered infeasible and is not being carried forward in this EA.

### **3.2 Alternative 1: No Action**

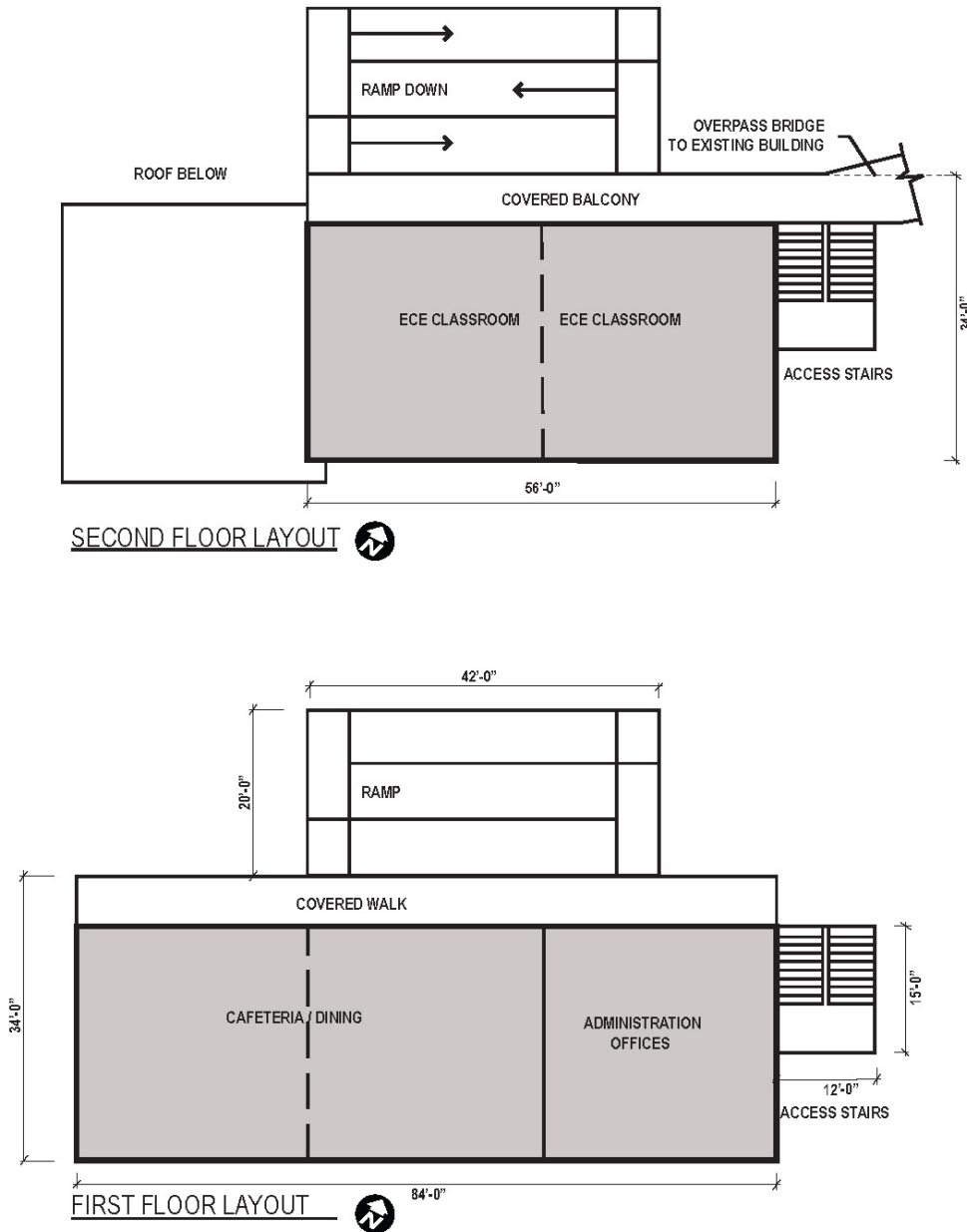
A No Action Alternative is required to be included in the environmental analysis and documentation pursuant to CEQ regulations implementing NEPA. The No Action Alternative maintains the status quo with no project and no federal financial assistance. The No Action Alternative is used to evaluate the effects of not providing assistance for the proposal and provides a benchmark against which other alternatives may be evaluated.

For the purposes of this EA, under the No Action Alternative, it is assumed that the three disaster-damaged (and subsequently demolished) school buildings would not be replaced or rebuilt to pre-disaster functionality and capacity. The functions previously facilitated through the use of the administrative offices, ECE classrooms, and the kitchen/cafeteria facilities would be accommodated within the temporary buildings currently on the campus or these functions would be discontinued. This would reduce the school’s capacity to provide educational services to the children of Fagasa.

### **3.3 Alternative 2: Proposed Action**

The Proposed Action is to replace the disaster-damaged (and subsequently demolished) administration building, ECE building, and kitchen/cafeteria building with a singular two-story multiuse building proposed by ASDOE to be constructed to current codes and standards (FEMA 2009). The new structure would be located 400 feet from the shoreline on a portion of what is now an approximately 7,000-square-foot level field of turf grass used as an informal play area. The proposed building location would be southwest of and immediately adjacent to the school’s existing two-story classroom building (Figure 3.1).

The proposed building would contain administration offices and a cafeteria/kitchen with dining room totaling approximately 2,352 square feet on the first floor (Figure 3.2). The second floor would contain two ECE classrooms and a restroom totaling approximately 1,568 square feet. A second floor outdoor walkway along the northwest side of the new structure would lead to a similar existing walkway on the second floor of the adjacent existing two-story building. Walkways would provide access between the two buildings at the first floor level as well. An exterior stairway and a handicap-accessible ramp would be constructed to provide access to the second floor of the proposed building (Image 4).



**Figure 3.2**

**Le'Atele Elementary School Proposed Building**

Source: American Samoa Department of Education



Image 4: View facing east to the proposed building site adjacent to the existing two-story classroom building. Men in photo are standing at the approximate location of the eastern corners of proposed building 400 feet from the shoreline.

The proposed location of the replacement building would be within FEMA FIRM Flood Zone AE (Zone AE). Zone AE encompasses high risk areas with a 1 percent or greater chance of flooding (100-year flood) with the BFE indicated at selected intervals on the FIRM (FEMA 2006). Just south of this location the school grounds are within FEMA FIRM Flood Zone X, an area of moderate flood hazard, between the limits of the 100-year and 500-year flood (Figure 3.1).

At the proposed building location approximately between 400 and 466 feet from the shoreline within Zone AE, the BFE is 17.0 feet AMSL (FEMA 2006). In Zone AE, the finished bottom of the lowest horizontal member supporting the lowest habitable floor must be at or above the BFE per the floodplain management requirements of 44 CFR 9 as well as ASG EO 004-2006 (Governor of American Samoa, 2006). Concept plans for the proposed building call for the structure to accommodate mitigation of an additional one foot of freeboard above the BFE of 17.0 AMSL. Thus, the finished bottom of the lowest horizontal member supporting the lowest habitable floor of the building would be at an elevation of 18.0 feet AMSL. Assuming a 1-foot vertical dimension between the finished bottom of the horizontal member supporting each floor and the finished floor above as well as a 10-foot ceiling height, the finished floor elevation (FFE) for the first floor would be 19.0 feet AMSL and the second floor FFE would be 30.0 feet AMSL.

The method of elevation proposed for the new building such as open space construction with piers or pilings should allow flood waters to flow freely (FEMA 2005). The existing elevation of the proposed building site must be verified and clearance for all proposed elevations must be

obtained from the appropriate American Samoa Government enforcement agency for floodplain conformance.

The first floor FFE of the existing adjacent building is approximately 12.0 feet AMSL. Due to the required minimum finished floor elevation of the new building, the walkways proposed to provide access between the existing and new buildings would have to accommodate a finished floor elevation difference of several feet; therefore, the design of the new structure would need to take this issue into consideration to resolve the expectation of unimpeded connectivity at both levels between the new and existing buildings.

Furthermore, any new attached structure (or any part thereof) that relies on the structural support of an existing building is considered to be a part of that existing building (FEMA, 2009). Therefore, since the existing two-story classroom building is within Zone VE, in the case that any new attached structure, such as an elevated walkway, would rely on any structural support from the existing building, the entire new structure would be determined within Zone VE as well. This would hold true even if the majority of the new structure would be within Zone AE. This case would not be in compliance with FEMA regulations related to funding of new construction.

Therefore, the proposed first and second story walkways providing access between the new and existing buildings must be supported by the walkways' own structure if the new building is to be considered within Zone AE. Specifically, the weight of the walkways cannot be supported by the existing two-story classroom building. The walkway can be secured to the existing two-story classroom building by bolts and screws; however, the support of the walkway cannot be provided by the existing building (FEMA 2009).

As part of the Proposed Action, all utilities, such as power, telephone, water gas, and sewage conveyance or drain field, would be provided via connection points to existing utility services on the school grounds. Some existing power lines on the school grounds would be relocated on-site to accommodate the proposed building.

The Proposed Action would require excavation of soil at the building site for installation of the foundation piers that will support the elevated structure. Additional ground disturbance would occur with the excavation of trenches for connection of lines to the underground utilities. The duration of construction would be approximately 8 months. Staging for construction equipment and materials would occur on disturbed areas within the existing school grounds. Staging areas would potentially include the turf grass area adjacent to the proposed building site, the informal parking area just west of the existing two-story classroom building, or the level gravel areas at the location of the three disaster-damaged (and subsequently demolished) buildings.



# 4.0 Affected Environment, Impacts, and Mitigation

The assessment of the Proposed Action consists of a description of existing conditions in the project area, discussions of the two alternatives including the potential of each to result in direct and indirect effects on the environment, and, if necessary, a description of mitigation measures or best management practices (BMPs) that would be effectively implemented, enforced, and monitored to avoid or minimize these effects. The assessment pursuant to NEPA (42 U.S.C. 4321 et seq.) is focused on the environmental resources for which some level of effect may result: air quality and greenhouse gas emissions, water resources, coastal resources, biological resources, cultural resources, geology, soils and seismicity, land use and planning, transportation, noise, utilities, socioeconomics/environmental justice and public safety, and visual resources.

## 4.1 Air Quality and Greenhouse Gas Emissions

The Federal Clean Air Act (CAA) of 1970 was enacted to regulate air emissions from area, stationary, and mobile sources. The CAA authorized the U.S. Environmental Protection Agency (USEPA) to establish National Ambient Air Quality Standards (NAAQS) to protect public health and the environment. Six major pollutants of concern or “criteria pollutants” are identified by USEPA: carbon monoxide (CO), lead, nitrogen dioxide (NO<sub>2</sub>), ozone (O<sub>3</sub>), sulfur dioxide (SO<sub>2</sub>), particulate matter less than 10 micrometers (PM<sub>10</sub>) and particulate matter less than 2.5 micrometers (PM<sub>2.5</sub>).

Specific geographic areas or air basins are designated by USEPA as either in “attainment” if they are within or “nonattainment” if they exceed allowable NAAQS for any criteria pollutant, based on air quality monitoring data submitted to USEPA and the number of days in which standards were exceeded (NMFS and USFWS 2012). Areas previously designated as nonattainment, but reclassified from nonattainment to attainment, are designated as “attainment/maintenance” areas. The CAA requires each state or territory to develop a State Implementation Plan (SIP) for areas in nonattainment of NAAQS. Pursuant to current USEPA listings, American Samoa is in attainment for all criteria pollutant NAAQS and, as a result, is not required to have a SIP in place for any criteria pollutant.

The CAA requires USEPA to promulgate rules to ensure that federal actions undertaken in nonattainment or maintenance areas are consistent with the CAA and with federally enforceable

air quality management plans, including SIPs. These rules, known as the General Conformity Rule (GCR) (40 CFR Parts 51.850–51.860 and 93.150-93.160) require any federal agency that is responsible for an action in a federal nonattainment or attainment/maintenance area to demonstrate conformity to the applicable SIP, either by determining that the action is exempt from the GCR or by making a formal conformity determination. As stated above, American Samoa is currently classified as in attainment of all NAAQS; therefore, general conformity determination requirements currently do not apply to projects in American Samoa.

In addition to criteria air pollutants of direct concern for human health, other air emissions are the result of natural processes and human activities, including greenhouse gases (GHGs), which trap heat in the atmosphere, regulating the earth's temperature. Water vapor is a naturally occurring GHG that accounts for the largest percentage of the greenhouse effect. Other common GHGs emitted from natural processes and human activities include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O).

Scientific evidence indicates a trend of increasing global temperatures (i.e., global warming) over the past century due to an increase in global GHG emissions. Climate change associated with global warming is predicted to produce negative environmental, economic, and social consequences across the globe. Recent observed environmental changes include shrinking glaciers, thawing permafrost, a lengthened growing season, and shifts in plant and animal ranges (IPCC 2007). Predictions of long-term negative environmental impacts include sea level rise, changing weather patterns with increases in the severity of storms and droughts, changes to local and regional ecosystems including the potential loss of species, and a significant reduction in winter snow pack.

The Governor of American Samoa issued EO 10A-2007 to address the issue of climate change in the territory (Governor of American Samoa 2006). EO 10A-2007 identified the repercussions of global warming and climate change to American Samoa, including loss of land mass and shoreline from sea level rise, increased food cost and dependence on off-island food sources, potential need for population relocation and the resulting loss of spiritual connection to the land, and loss of coral reefs with the resulting increase in mortality and economic loss from lack of reef protection from cyclones.

#### **Alternative 1: No Action**

Under the No Action Alternative, no facilities would be built and no construction activities would occur, resulting in no project-related pollutant emissions. Therefore, there would be no effects on air quality and no GHG emissions would occur.

### **Alternative 2: Proposed Action**

Implementation of the Proposed Action would result in a minor amount of pollutants on a temporary basis due to construction-related ground disturbance and vehicle and equipment operation. Impacts would include temporary increases of fugitive dust (PM<sub>10</sub> and PM<sub>2.5</sub>) and direct emissions related to fossil fuel combustion (CO, NO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, and volatile organic compounds) powering construction equipment and vehicles. Construction of this small-scale project is expected to occur for a period of approximately 8 months. Due to the small scale of the proposed construction, pollutant emissions would not be of a concentration that would create health concerns or affect air quality. To further minimize temporary air quality effects, ASDOE would require contractors to employ the following BMPs to limit emissions, fugitive dust, and exhaust:

- maintain and cover spoils piles,
- cover the load of haul vehicles containing fill or cut soil,
- keep construction equipment properly tuned, and
- enforce a limitation on idling time for construction vehicles.

The Proposed Action does not include any considerable source of direct permanent pollutant emissions and effects would be limited to the temporary emissions during the small-scale construction project. Once the replacement building is operational, the campus would return to its pre-disaster capacity, thus the Proposed Action would not increase activity on the site, accommodate future growth, or change the function of the campus. Therefore, the Proposed Action would not result in permanent increases in pollutant emissions. Furthermore, general conformity determination requirements do not currently apply to projects in American Samoa due to the territory's NAAQS attainment status as outlined above.

Similarly, the Proposed Action would result in temporary emissions of GHG during construction. The potential effects of proposed GHG emissions are, by nature, global and cumulative effects, as individual projects or sources of GHG emissions are not large enough to have an appreciable effect on climate change. Thus, an appreciable effect on global climate change would only be measurable if proposed GHG emissions were to be considered together with all other GHG emissions from human-made activities across the globe.

To date, there are no formally adopted or published NEPA thresholds of significance for GHG emissions. The *Draft NEPA Guidance on Consideration of the Effects of Climate Change and Greenhouse Gas* issued by CEQ (CEQ 2010) suggested threshold of 25,000 metric tons of

GHG emissions per year as an indicator for GHG impact assessment. The Proposed Action's GHG emissions would be negligible short-term emissions due to construction activity far below the CEQ threshold. Consequently, the Proposed Action would not contribute substantially to cumulative impacts associated with global climate change. Furthermore, ASDOE would be responsible for complying with ASG climate change and GHG regulations as outlined in ASG EO 10A-2007. The Proposed Action would result in minor and temporary effects related to GHG emissions.

## 4.2 Water Resources

Surface water on Tutuila is primarily in the form of perennial and ephemeral streams that provide habitat for freshwater fish, plants, and invertebrates. Streams are also a source of drinking water in some remote parts of the island. All surface waters on the island discharge directly into marine water bodies. Groundwater is the principal source of the domestic and industrial water supply as it is more abundant and has a higher quality than surface water (FEMA 2010). Groundwater is either impounded behind impermeable or semi-permeable subterranean reservoirs, or migrates below the surface along routes of permeable soils or erosion features, before discharging to the surface (USGS 1963). Groundwater that has migrated downslope at or near the ocean is referred to as "basal ground water". The distribution of groundwater on American Samoa is currently being mapped and systematically described (ASEPA 2010). Also, after the disaster, construction of the temporary fabric structures at the Le'Atele school uncovered a vein of basal groundwater running below. The placement of thick concrete pads for the structures spanned the basal groundwater, without disrupting the flow of water toward the ocean. The project area experiences a tropical maritime climate with abundant rain and warm, humid days and nights. Rainfall across Tutuila is highly variable due to the effects of the steep mountainous terrain, averaging between 120 and 200 inches annually. The driest period is during winter (June–September) and the wettest is during the summer (December–March) (Clark and Herdrich 1993).

The Le'Atele school site is located in the Fagasa watershed, an area of approximately 1.35 square miles that drains into Fagasa Bay. Eight streams are in the watershed, including Agasii Stream, an ephemeral stream located approximately 500 feet southeast of the proposed site. Agasii Stream is a jurisdictional water of the U.S. (ASEPA and ASCMP 2000). A review of the wetlands database compiled in the American Samoa Department of Commerce (ASDOC) Geographic Information System (GIS) (ASDOC GIS November, 2012) indicated that no wetlands occur within or adjacent to the school grounds. Field surveys documented an off-site rock/cobble-lined surface water diversion drainage ditch along the northern and western edge of the campus at the base of Fuaau Ridge that provides some storm water management for the

area (ASDOC 2012), but this does not meet the criteria as a wetland or jurisdictional water of the U.S. A 2.8-acre wet area resembling a marsh area [*taufus*] fed by surface drainage from Agasii Stream is located approximately 550 feet southeast of the school grounds, outside the Proposed Action area. This marsh does not interchange with the nearby marine waters because of its elevation. An additional shallow drainage ditch is located along the southeastern edge of the campus, draining surface waters into Fagasa Bay.

#### 4.2.1 Flood Hazards

The FIRM (FEMA, 2006) indicates that the proposed building site is located 400 feet from the shoreline within Zone AE and the existing temporary structures, shown in Image 2, are located in Zone VE.

EO 11988, Floodplain Management, requires federal agencies to avoid, to the extent possible, the short- and long-term adverse impacts associated with the occupancy and modification of floodplains. FEMA's regulations for complying with EO 11988 are found in 44 CFR Part 9, Floodplain Management and Protection of Wetlands (FEMA 2008). FEMA applies an Eight-Step Decision-Making Process to ensure that funded projects are consistent with EO 11988 and 44 CFR Part 9. The NEPA compliance process involves essentially the same decision-making process. Therefore, the Eight-Step Decision-Making Process has been integrated into the analysis in this EA.

Typically the drainage ditches along the southeast and northwest sides of the campus channel storm water runoff effectively from the campus (ASEPA and ASCMP 2000). However, flooding has occurred at the proposed site following heavy rainfall periods, due to the occasional blockage of an overflow ditch connecting a nearby 2.8-acre wet area resembling a marsh [*taufus*] to the nearshore waters. When these conditions occur, local residents typically remove the blockage by hand. The American Samoa Department of Public Works (ASDPW) sometimes clears larger blockages of this ditch with a backhoe.

##### **Alternative 1: No Action**

Under the No Action Alternative, no construction would occur and the existing temporary fabric structures would remain. These slab-on-grade structures are in Zone VE, which would result in a continued floodplain hazard for these structures and the school uses they accommodate.

##### **Alternative 2: Proposed Action**

One of the purposes of the Proposed Action is to protect against future flood hazards by locating the replacement facilities outside of Zone VE. However, the proposed construction site is in Zone AE, so the Proposed Action would still need to comply with EO 11988, 44 CFR Part

9, and the Territory of American Samoa Floodplain Management Regulations EO 004-2006, which specifies that the finished bottom of the lowest horizontal member supporting the lowest habitable floor of structures constructed in Zone AE must be elevated to or above the BFE, with provisions for justifiable variances, if approved by the Floodplain Administrator to the Territorial Registrar (ASG 2008). Under the Proposed Action, the replacement building would be erected in Zone AE on a site with a BFE of 17 feet AMSL (Figure 3.1). Current plans for the elevated building establish a FFE of the first floor at 19.0 feet AMSL. This includes mitigation, consisting of raising the structure an additional one foot above the BFE. Assuming a 1-foot vertical dimension between the finished bottom of the horizontal member supporting each floor and the finished floor above as well as a 10-foot ceiling height, the FFE for the second floor would be at 30.0 feet AMSL. Because of the continued potential for flood hazards on the site, ASDOE must design the structure with consideration of the principles of the “all-hazards approach” outlined in FEMA’s Coastal Construction Manual (FEMA 2011). The Proposed Action would result in a beneficial effect with respect to floodplains by constructing a replacement building outside of Zone VE (Image 5). The moderate floodplain effects resulting from construction in Zone AE would be mitigated by mandatory elevation of the structure.



Image 5: The topography of the Le’Atele campus slopes very gently upward as one moves away from Fagasa Bay, barely visible in the background. The photograph was taken standing next to the south end of the existing two-story classroom building, on the approximate boundary line between Flood Zone VE and Flood Zone AE (behind viewer).

In accordance with the EO 11988 and 44 CFR Part 9, FEMA published a cumulative Initial Public Notice for FEMA-1859-DR-AS. TOFR and ASDOE, with support from FEMA, would be

required to publish an individual Final Public Notice before implementation of the Proposed Action.

#### 4.2.2 Water Quality

As noted above, the proposed project site does not contain any surface water or wetlands, but is near waters that flow into Fagasa Bay and are used for drinking water purposes. The American Samoa Environmental Protection Agency (ASEPA) maintains programs to ensure the quality of surface water and drinking water, such as American Samoa Watershed Protection Plan (ASEPA and ASCMP 2000), Guidance Manual for Runoff Control (ASG and ASEPA 2001), and ASEPA's American Samoa Erosion & Sediment Control Field Guide (ASEPA and ASCMP 2011). The ASEPA Guidance Manual for Runoff Control provides direction to property owners, construction contractors, government agencies, developers and others who are performing activities that could result in pollution of American Samoa's surface and/or groundwater resources as a result of storm water runoff (ASG and ASEPA 2001).

ASEPA has identified three major water quality concerns on Tutuila: (1) sediment generated by improper land use practices that enters streams and coastal waters after heavy rains; (2) nutrient enrichment from human and animal wastes in populated areas; and (3) contamination in Pago Pago Harbor. The harbor is geographically separated from the project site; therefore it is not relevant to these alternatives. Additionally, household waste and other human-made debris are frequently found in streams and on beaches.

Potential groundwater contamination is another concern on Tutuila. Groundwater is the principal source of domestic and industrial water supply because it is more abundant and has a higher quality than surface water (CSREES 2004). However, the volcanic soil and bedrock of the island are highly permeable and do not act as good filters. Therefore, the groundwater is easily threatened by surface contaminants. Two wells are located approximately 1,000 feet south of the project site that contribute to the village water supply (ASDOC 2013).

Sections 401 and 404 of the Clean Water Act (CWA) (33 U.S.C. §1251 et seq.) regulate discharge into jurisdictional wetlands and waters of the U.S. to ensure water quality in these surface water features is properly maintained. Section 401 requires discharge activities to acquire water quality certifications from the applicable regulatory agency, which in American Samoa is ASEPA. Section 404 requires discharge activities to obtain a permit from the U.S. Army Corps of Engineers (Section 404).

Section 402 of the CWA establishes the National Pollutant Discharge Elimination System (NPDES). The purpose of the NPDES program is to reduce point- and nonpoint-source pollutant

discharge into water resources. Construction activities that result in 1 acre or more of ground disturbance are regulated under the NPDES program and require an NPDES General Permit, which outlines conditions to reduce nonpoint-source pollutant discharge. The NPDES program in America Samoa is administered by USEPA.

**Alternative 1: No Action**

The No Action Alternative would not result in any ground disturbance on the site; therefore, existing water quality in the nearby water features and percolated groundwater would remain unchanged.

**Alternative 2: Proposed Action**

Implementation of the Proposed Action would have the potential for soil erosion and pollutants to indirectly affect off-site surface water (including wetlands) and groundwater on a temporary basis due to the construction of a replacement building approximately 400 feet from the shoreline and installation of related utility connections. The campus is near the shoreline of Fagasa Bay, and surface water flows directly into the bay via sheet flow or channelized conveyance (Image 6).



Image 6: View facing east to Fagasa Bay from entry to Le'Atele Elementary School at the north end of the shoreline road. Storm water from the campus drains directly into Fagasa Bay via both sheet flow and channelized conveyance.

Current ASG storm water guidelines may require or recommend diversion of storm water from the roof of any new building into an infiltration basin or other storm water detention facility to slow the flow into the bay and improve water quality.



Because the Proposed Action would not result in 1 acre or more of disturbance, ASDOE would not be required to obtain an NPDES General Permit under Section 402 of the CWA. The Proposed Action's temporary effect on water quality would be mitigated by ASDOE's fulfillment of conditions placed on the Proposed Action by ASG as part of their Project Notification Review System (PNRS) Land Use Permit (LUP) process. ASG would issue project-specific conditions in the LUP requiring ASDOE to ensure that storm water generated on site is contained on the site. ASDOE would be required to consult with ASEPA on specific BMPs, which must be implemented as directed and approved by ASEPA, and ASDOE would be required to ensure that silt fences, curtains, and other water quality structures are properly installed and maintained to avoid transport of fill or exposed soils from the construction site. The permit would give the ASDOC's American Samoa Coastal Management Program (ASCMP) authority to stop work, require corrective measures, and seek legal enforcement in the unforeseen event that the Proposed Action's BMPs are not effectively controlling water quality on the site. If ASDOE cannot for any reason meet the conditions described in their LUP and if any discharge occurs to waters of the U.S. such that a 401 or 404 permit might be necessary, ASDOE would be required to halt work immediately and notify TOFR, FEMA, and ASEPA or USACE (as appropriate), to determine the proper steps to initiating the relevant Clean Water Act permit process.

To meet the conditions that would be placed on the Proposed Action's LUP, ASDOE would require the construction contractor to prepare and implement an erosion control plan. The erosion control plan would include phased construction to minimize the amount of exposed soil at any given time and would require all work to cease during heavy rains. The plan would require that all soil that is stockpiled on-site for use as fill or that has been excavated from the project area, be covered and surrounded by a sediment barrier to prevent sediment loss. Additionally, the plan would include a debris-disposal plan to ensure that all excavated material is transferred to a designated and preapproved debris disposal site as described in ASEPA's American Samoa Erosion & Sediment Control Field Guide (ASEPA and ASCMP 2011) and the ASEPA Guidance Manual for Runoff Control (ASG and ASEPA 2001). ASDOE would also implement permanent erosion control measures as described in the American Samoa Erosion & Sediment Control Field Guide, where appropriate, when construction is completed (ASEPA and ASCMP 2011).

In addition to the erosion control plan, ASDOE would ensure the effective implementation, enforcement, and monitoring of the standard BMPs required of the construction contractor throughout construction as indicated by ASEPA's American Samoa Erosion & Sediment Control Field Guide (ASEPA and ASCMP 2011) and the Guidance Manual for Runoff Control (ASG and

ASEPA 2001). BMPs would include such measures as vegetative stabilization and physical stabilization.

Field surveys by AECOM as a consultant to FEMA documented an off-site rock/cobble-lined surface water diversion ditch to the west of the project area footprint, but no features that could be considered wetlands or jurisdictional waters of the United States are within the limits of the project area. Therefore, the Proposed Action would not result in the direct or indirect effect to wetlands or jurisdictional waters and would not require a water quality certification from ASEPA or a Section 404 permit from the U.S. Army Corps of Engineers.

With the effective implementation, enforcement, and monitoring of the erosion control plan and the BMPs stated above, ASDOE would ensure that construction activities would not result in soil, debris, or other fill materials being placed into surface water bodies (including wetlands). Importantly, ASDOE would ensure that there will be no discharge and run-off of sediment to the marine environment due to the Proposed Action; and no adverse effects would occur.

### 4.3 Coastal Resources

American Samoa faces coastal concerns of fishery habitat loss, coral reef health coastal hazards (such as cyclones, flooding, and erosion), marine debris, and solid waste. To help mitigate the effects of human activity, the ASG operates the American Samoa Coastal Management Program (ASCMP) as part of the ASG Department of Commerce (ASDOC). The ASCMP designates the entire island of Tutuila and the sea within 3 miles of the shoreline as a coastal zone. The ASCMP oversees all construction and earth-moving activities on the island to ensure coastal resources are not affected by project work.

The United States Congress enacted the Coastal Zone Management Act (CZMA) in 1972 and the Coastal Zone Act Reauthorization Amendments in 1990 in response to the increasing pressures of overdevelopment on the nation's coastal resources. These laws make federal financial assistance available to any coastal state or territory that is willing to develop and implement a comprehensive coastal management program. These regulations apply to all actions within a designated coastal zone and require that any federal agency whose activities directly affect the coastal zone be consistent, to the maximum extent practicable, with approved state or territory coastal zone management programs (FEMA 2008). The federal consistency provisions of the CZMA require that all federally funded, licensed, or permitted projects affecting the coastal zone of American Samoa be conducted in a manner that is consistent with the federally approved ASCMP (FEMA 2008).

### **Alternative 1: No Action**

Under the No Action Alternative, no construction would occur, and no effects on the coastal zone would occur.

### **Alternative 2: Proposed Action**

The Proposed Action would entail a minor amount of soil disturbance and construction activity that would occur due to the construction of a building 400 feet from the shoreline and installation of related utility connections all within the coastal zone, as regulated by the ASCMP. As a result, the Proposed Action would have the potential to affect coastal waters through pollutant runoff and erosion and sediment reaching the nearby bay. As noted above, ASDOE would require the contractor to prepare and implement an erosion control plan and employ appropriate required and recommended construction BMPs to ensure project construction does not affect nearby waters. With implementation of these measures, the Proposed Action would not result in an adverse effect on coastal waters. ASDOE would be responsible for coordinating with and obtaining a federal consistency determination from the ASCMP to comply with the CZMA.

## **4.4 Biological Resources**

Biodiversity of terrestrial species on Tutuila is low due to the island's volcanic origin and remote location (Craig 2005). The main vegetation type is that of a tropical rainforest, but many nonnative plants have outcompeted the native plants in disturbed environments (Whistler 1994). This situation is true in the project area, which consists of a previously disturbed area, currently supporting vegetation consisting primarily of nonnative grasses, and bare ground where the former Le'Atele Elementary School buildings were located. A small area on the southwest side of the school grounds also consists of vegetation dominated by nonnative species, including banana trees (*Musa paradisiaca*), taro plants, and a variety of weedy species.

On April 14, 2012, a natural resource reconnaissance survey was conducted by AECOM as a consultant to FEMA for the project area. While the project area has been previously disturbed and lacks native vegetation communities, the site is contiguous with natural, native vegetation off-site. Vegetation on-site is dominated by invasive, ornamental, or agricultural species. Noted examples of vegetation include para grass (*Brachiaria mutica*), coix [*sanasana*] (*Coix lacrymajob*), and Australian pine [*toa*] (*Casuarina equisetifolia*), as well as many other weedy species. Coconut trees [*niu*] (*Cocos nucifera*) and taro plants (*Colocasia esculenta*) occur sporadically in the project area. The nonnative cane toad [*lane*] (*Bufo marinus*) was observed in the grassy field within the project area (Image 7).



Image 7: Several nonnative cane toads were observed on the project site.

Other wildlife resources expected to be associated with the project area include a variety of introduced and native bird species. Common nonnative bird species known from the region include jungle myna (*Acridotheres fuscus*), red junglefowl (*Gallus gallus*), and red-vented bulbul [*manu palagi*] (*Pycnonotus cafer*). Resident bird species known from the area include species such as white-tailed tropicbird [*tava'esina*] (*Phaethon rubricauda*) and gray-backed tern [*gogosina*] (*Sterna lunata*).

Two shallow drainage ditches are located along the east and west edges of the campus, draining into Fagasa Bay. A narrow ring around Tutuila contains shallow coastal habitats that support coral reef ecosystems. Deepwater habitats around the island reach depths of 2,000 feet and are located between 0.5 and 2 miles from the coast (Craig 2005). Being wholly on land, the project area does not contain either coral reef or deepwater habitat.

#### 4.4.1 Threatened and Endangered Species

Section 7 of the Endangered Species Act of 1973 (ESA) (16 U.S.C. § 1536(a)(2)) requires federal agencies to determine whether projects they propose to carry out or fund have any potential to affect species listed or proposed for listing as threatened or endangered or designated critical habitat.

FEMA obtained a list of species that are listed as endangered, threatened, or proposed for listing as endangered or threatened under the ESA that may occur in the project vicinity (USFWS 2011, NMFS and USFWS 2011) .

Based on the data compilation, FEMA, and AECOM as a consultant to FEMA, conducted biological investigations of the project site. As a result of the field and background review, FEMA made the initial determination that the project area is in proximity to habitats suitable to support four federally listed or proposed wildlife species regulated by USFWS and National Marine Fisheries Service (NMFS) under the ESA, as follows:

**Hawksbill sea turtle** [*laumei uga*] (*Eretmochelys imbricata*) (Endangered): Hawksbill sea turtles are distributed worldwide in tropical seas. The species has been documented throughout the Pacific, frequently associated with deepwater coral and seagrass beds. The sandy beaches on American Samoa provide nesting habitat for the hawksbill sea turtle, including approximately 16 kilometers of sandy beaches on Tutuila Island (Tuato'o-Bartley et al. 1993). Tutuila supports an estimated 50 nesting female hawksbill sea turtles per year (NMFS and USFWS 1998a).

**Green sea turtle** [*laumei ena'ena* or *fonu*] (*Chelonia mydas*) (Threatened – Pacific Population): The green sea turtle nests on the sandy beaches of American Samoa and forages in the open ocean and coastal waters associated with deepwater coral and seagrass beds. Green sea turtles occur in the waters off Tutuila, with an estimated low nesting population on the island (NMFS and USFWS 1998b).

**Leatherback sea turtle** (*Dermochelys coriacea*) (Endangered): The leatherback sea turtle has the widest distributional range of all sea turtles. However, the species does not nest on American Samoa. One juvenile leatherback sea turtle has been documented in the waters off of American Samoa, south of Swains Island, caught by a scientific research longline fishing vessel in 1994 (NMFS and USFWS 1998c).

**Loggerhead sea turtle** (*Caretta caretta*) (Threatened): Loggerhead sea turtles are circumglobal, inhabiting bays, lagoons, and open seas of the Atlantic, Pacific, and Indian oceans. No documented observations of this species have been made on the beaches of American Samoa, or in the waters surrounding the islands (NMFS and USFWS 1998d).

None of these species were observed during biological surveys of the project area.

#### **Alternative 1: No Action**

Under the No Action Alternative, no activities would occur and therefore no effects would occur to federally listed or species proposed for federal listing under the ESA.

### **Alternative 2: Proposed Action**

The Proposed Action's development footprint is less than 1 acre in size and is located primarily on previously developed and disturbed land associated with the existing Le'Atele Elementary School campus. No suitable sea turtle nesting beaches are located within the project area. No designated critical habitat for the hawksbill sea turtle, green sea turtle, or leatherback sea turtle is located in or adjacent to the project area. Neither NMFS nor USFWS has designated or proposed critical habitat for the loggerhead sea turtle.

To avoid any indirect effects to sea turtle foraging habitat in Fagasa Bay, ASDOE would require incorporation of standard BMPs into the project design and construction drawings, including implementation of erosion control measures to prevent construction-related sediment transport into the bay. Standard BMPs would follow ASEPA's *American Samoa Erosion & Sediment Control Field Guide* (ASEPA and ASCMP 2011) and the ASEPA Guidance Manual for Runoff Control (ASG and ASEPA 2001) as described in Sections 4.2.2 and 4.6.1 of this document. Pursuant to the LUP conditions dictated by ASG, ASDOE would be required to consult with ASEPA on project-specific BMPs. ASCMP would have the authority to stop work, require corrective measures, and seek legal enforcement if the BMPs are not effectively controlling water quality on the site. With the implementation of BMP measures to avoid indirect effects, the Proposed Action would not affect any federally listed or proposed threatened or endangered species or designated or proposed critical habitat.

#### **4.4.2 Invasive Species**

EO 13112, Invasive Species of 1999, requires federal agencies to prevent the introduction of invasive species; provide for their control; and minimize the economic, ecological, and human health impacts that invasive species cause. EO 13112 requires that federal agencies not authorize, fund, or implement actions that are likely to introduce or spread invasive species unless the agency has determined that the benefits of the action(s) outweigh the potential harm caused by invasive species, and that all feasible and prudent measures to minimize harm caused by invasive species will be implemented in conjunction with the action(s).

### **Alternative 1: No Action**

Under the No Action Alternative, no ground-disturbing activities would occur; therefore, there would be no introduction or spread of invasive species in the project area.

### **Alternative 2: Proposed Action**

The Proposed Action has limited potential to contribute to the spread of invasive species in the project area. The majority of the proposed activities occur in or adjacent to land that has been previously developed or disturbed. All equipment would be staged on previously developed and

disturbed areas within the project area. ASDOE would take measures to prevent the introduction of invasive weeds at the construction site, including cleaning all equipment before accessing the site and using only certified weed-free erosion-control materials. On completion of construction, any temporarily cleared areas that would be revegetated would use appropriate native species, thus decreasing the amount of invasive species in the project area. Exceptions to this requirement would include areas intended for playgrounds or activity fields for the school grounds, which can be vegetated with turf grass. ASDOE would ensure that any imported fill or other construction materials would be certified as being free of invasive species.

The potential for the Proposed Action to contribute to the spread of invasive species is minimal, and this alternative would comply with EO 13112. Therefore, the Proposed Action is anticipated to result in negligible short-term direct and indirect impacts due to invasive species.

#### 4.4.3 Protection of Wetlands

EO 11990 requires federal agencies to take action to minimize the destruction or modification of wetlands by considering both direct and indirect effects to wetlands that may result from federally funded actions. FEMA's regulations for complying with EO 11990 are found in 44 CFR Part 9, Floodplain Management and Protection of Wetlands.

No wetlands were observed during the site reconnaissance within the Proposed Action project area. The closest jurisdictional drainage is Agasii Stream, approximately 550 feet southeast of the Le'Atele Elementary School site (ASEPA and ASCMP 2000). The offsite 2.8-acre wet area that resembles a marsh [*taufusi*] identified in Section 4.2.1 of this document is located approximately 150 feet southeast of the Le'Atele school campus extents. The *taufusi* is on higher ground than the school campus at an approximate elevation of 12 to 25 feet AMSL, and no activities associated with any of the project alternatives would be expected to impact the *taufusi*. The American Samoa Watershed Protection Plan identifies the offsite *taufusi* adjacent to Agasii Stream as formerly being used for subsistence farming.

##### **Alternative 1: No Action**

Under the No Action Alternative no ground-disturbing activities would occur; therefore, no effects to wetlands would occur.

##### **Alternative 2: Proposed Action**

A review of the wetlands database compiled in the ASDOC GIS (2012) indicated that no wetlands occur within or adjacent to the project area. Agasii Stream and an associated wet area resembling a marsh [*taufusi*] are located approximately 0.2 mile southeast of the school site (ASEPA and ASCMP 2000). Field surveys by AECOM as a consultant to FEMA documented an

off-site rock/cobble-lined surface water diversion ditch to the west of the project area footprint, but no features that could be considered wetlands or jurisdictional waters of the United States are within the limits of the project area. Therefore, the Proposed Action would not result in the direct or indirect effect to wetlands or jurisdictional waters, and would comply with EO 11990.

#### 4.4.4 Coral Reef Protection

EO 13089 requires federal agencies to ensure that actions they authorize, fund, or implement will not degrade the conditions of coral reef ecosystems. The island of Tutuila is surrounded by a fringing coral reef. Coral reefs surrounding Tutuila are impacted by poor water quality (USEPA 2007). Natural phenomena such as hurricanes and disease have always taken their toll on reefs, but their effects are exacerbated by human activities in the ocean and on land. Besides destructive fishing practices and coral collecting, impacts come from sediments eroded from agricultural and construction operations, sewage, and other effluents. The Coral Reef Ecosystem Monitoring Report for American Samoa documents the closest coral reef, relative to the project area, approximately 0.5 mile to the north-northeast of the site, at the mouth of Fagasa Bay (Brainard 2008; ASDOC GIS February, 2012).

##### **Alternative 1: No Action**

Under the No Action Alternative, no ground-disturbing activities would occur; therefore, no direct impacts would occur to coral reefs.

##### **Alternative 2: Proposed Action**

The Proposed Action would occur on land, approximately 400 feet from the shoreline and a distance away from any documented coral reefs. As such, no direct impacts are anticipated to occur. To avoid any indirect impacts to coral reefs, ASDOE would require incorporation of BMPs into the project design and construction drawings, including the implementation of erosion control measures to prevent construction-related sediment transport into the harbor. These BMPs would be identified in compliance with the Proposed Action's LUP process, and would follow ASEPA's American Samoa Erosion & Sediment Control Field Guide (ASEPA and ASCMP 2011) and the ASEPA Guidance Manual for Runoff Control (ASG and ASEPA 2001) as described in Sections 4.2.2 and 4.6.1 of this document. With the effective implementation, enforcement, and monitoring of the proposed BMPs to avoid indirect impacts, there will be no discharge or run-off of sediment to the marine environment due to this project; and the Proposed Action would not affect any coral reefs. To minimize sedimentation in Fagasa Bay, ASDOE would be responsible for implementing the erosion control project features referenced in this document. ASDOE would also ensure that coral is not a component of fill materials or used in the concrete mixture for the Proposed Action. Therefore, the Proposed Action is expected to comply with EO 13089 and not result in direct or indirect effects on coral reefs.



#### 4.4.5 Protection of Fisheries Resources

The Magnuson-Stevens Fishery Conservation and Management Act of 1976 as amended (MSA) (16 U.S.C. 1801 et seq.) provides for the conservation and management of sustainable fisheries within the United States' coastal waters. In 1996, the MSA was amended to require the identification and management of Essential Fish Habitat (EFH) for managed species (16 U.S.C. §305[b]). EFH is defined as "those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity." The MSA mandates that federal action agencies which fund, permit, or carry out activities that may adversely affect EFH of federally managed fish species to consult with the National Marine Fisheries Service (NMFS). For the waters surrounding Tutuila, American Samoa (including Fagasa Bay) EFH has been designated by the Western Pacific Regional Fishery Management Council as the water column and bottom habitat from the shoreline to the outer boundary of the Exclusive Economic Zone to a depth of 50 fathoms (Blyth-Skyrme et al). Recent studies of Fagasa Bay recorded 403 marine species, including 129 fishes, 232 invertebrates, and 42 algae and seagrass species (Coles et al 2003). Fagasa bay is one of the very few reefs in American Samoa that is popular for the traditional seasonal harvesting of the big eye scad [*atule*] (NMFS and USFWS 2013).

##### **Alternative 1: No Action**

Under the No Action Alternative, no ground-disturbing activities would occur; therefore, no direct impacts would occur to EFH.

##### **Alternative 2: Proposed Action**

The Proposed Action would occur on land, approximately 400 feet from the shoreline and a distance from any EFH. In order to protect the EFH within Fagasa Bay, ASDOE would be required to effectively implement, enforce, and monitor the BMPs described herein, in accordance with their LUP, which would minimize any project-related effects to EFH. With the effective implementation of the proposed impact avoidance and minimization measures described in Section 4.2.2, there will be no discharge or run-off of sediment to the marine environment due to this project. Therefore, the Proposed Action would not affect EFH. If ASDOE cannot for any reason implement the Proposed Action without adversely affecting EFH, work must halt and ASDOE must immediately notify TOFR and FEMA, so that FEMA can consult with NMFS pursuant to MSA.

#### 4.4.6 Wildlife and Vegetation

The primary special-status biological resources actively monitored on Tutuila by the ASDMWR include colonies of fruit bat [*pe'a*], including Samoan fruit bat [*pe'a vao*] (*Pteropus samoensis*), and white-naped fruit bat [*pe'a fanua*] (*Pteropus tonganus*), as well as the declining populations

of several species of endemic land snails. The natural habitat for the fruit bat is the rainforest, roosting in trees during the day, and foraging from dusk until dawn. There are also populations of several species of endemic land snails that also inhabit the rainforest and can be found in other wet, moist habitats such as marshes or other wetlands.

**Alternative 1: No Action**

Under the No Action Alternative, no ground-disturbing activities would occur; therefore, no direct or indirect impacts would occur to wildlife or vegetation.

**Alternative 2: Proposed Action**

The Proposed Action may disturb wildlife habitat in the vicinity of the project. Replacement of the disaster-damaged school facilities would involve the pouring of concrete foundation piers and removal of nonnative vegetation in the project area, specifically within a narrow band on the south side of the campus at the site of the proposed building. However, the Proposed Action would not impact any rainforest vegetation or wetlands. Therefore, no fruit bat roosts or populations of endemic land snails would be impacted by the project.

Ground disturbance during construction would result in associated loss of approximately 0.5 acres of vegetation, which may be suitable habitat for wildlife species species, including small mammals, reptiles, amphibians, and insects. During construction, animal species in the vicinity would experience both permanent and short-term loss of habitat. Permanent loss of a small amount of habitat would be associated with the construction of the new school building. Temporary impacts would be associated with the harassment of wildlife from noise and dust generated by equipment movement.

Several bird species, including jungle myna, red junglefowl, and red-vented bulbul [*manu palagi*] have the potential to occur within and adjacent to the project area. The federal Migratory Bird Treaty Act of 1918 (16 U.S.C. §§ 703–712) (MBTA) affords protection to a wide variety of both resident and migratory birds. ASDOE would be responsible for complying with the MBTA for all construction-related activities, by minimizing the potential for “take” of MBTA-covered species during the migratory bird breeding season (generally accepted as starting on February 15 and ending on September 15). Impact minimization measures would include scheduling construction outside of the bird nesting season (i.e., avoiding the period from February 15 through September 15). If construction cannot be avoided during the nesting season, preconstruction nesting bird surveys would be required to determine if birds are nesting within the project area and within a 500-foot buffer around the campus boundaries. If nesting is documented, a qualified biologist would be required to monitor any active nests and to coordinate with ASDOE and the construction manager to minimize any potentially adverse effects to MBTA-covered

species. The minimization measure would require establishing a nondisturbance buffer around the nest (the size of which will be dependent upon the species, but not greater than 500 feet) until nesting activity has been completed at that location,

The Proposed Action would result in direct permanent impacts to wildlife habitat and vegetation within a narrow band on the south side of the campus, at the edge of the new building location (Figure 3.1). Since the loss of wildlife habitat and vegetation is relatively minor in acreage, the vegetation is composed primarily of nonnative, ornamental, and agricultural species, and ASDOE would ensure compliance with the MBTA and minimization measures, this impact would be negligible.

#### 4.5 Cultural Resources

In addition to review under NEPA, consideration of impacts to cultural resources is mandated under Section 106 of the National Historic Preservation Act of 1966, as amended and specified in the 36 CFR Part 800 regulations. Requirements include identifying historic properties that may be affected by a federal undertaking and mitigating adverse effects to those resources.

The cultural resources investigation of the Undertaking included consultation with American Samoa Preservation Office (ASHPO), background and archival research as well as an archaeological survey. The cultural resources investigation was conducted by AECOM, as a consultant to FEMA, to identify and evaluate historic properties. The archaeological survey of the 0.55-acre area of potential effects (APE) was conducted on April 14, 2012. The administrative building, ECE building, and kitchen/cafeteria building were identified as demolished and lacking enough integrity to be considered historic properties eligible for the National Register of Historic Places (NRHP) under any criteria. During the cultural resources investigation, no historic properties were identified within the APE (FEMA 2013). Based on the results of its identification and evaluation effort, FEMA determined that implementation of the Undertaking would result in a finding of “no historic properties affected” under 36 CFR 800.4(d).

The Cultural Resources Inventory Report detailing the results of the surveys and literature search is referenced as Appendix D of this EA.

As documented in the correspondence in Appendix A of this EA, ASHPO is in concurrence with the results of the Cultural Resources Inventory Report. ASHPO concurs with the determination of the APE. ASHPO also concurs with the determination of no effect on historic properties with the proviso that if any subsurface historic properties are discovered during ground-disturbing activities, construction will be stopped and the necessary measures will be taken to avoid or minimize harm to the property in consultation with ASHPO, pursuant to 36 CFR Part 800.13(d).

### **Alternative 1: No Action**

Under the No Action Alternative, no construction would occur; therefore, no impacts on cultural resources would occur.

### **Alternative 2: Proposed Action**

No historic or prehistoric cultural resources were identified during the cultural resources inventory of the APE; therefore, the Proposed Action would not remove or affect any known resources.

Although the potential is low, unexpected subsurface historic properties could be discovered during ground-disturbing activities. Therefore, ASDOE (including its contractors and agents) would be responsible for halting work in the event of an unanticipated discovery during construction, and notifying TOFR and FEMA as soon as practicable. If FEMA determines that the discovery has the potential to be a significant historical property, FEMA would require ASDOE to stop all construction in the vicinity of the discovery and to take all reasonable measures to avoid or minimize harm to the property until FEMA concludes consultation with ASHPO, pursuant to 36 CFR Part 800.13(b). Implementation of the measures stated above will ensure that the Proposed Action would not result in any adverse effects on cultural resources, if discovered.

## **4.6 Geology, Soils, and Seismicity**

The island of Tutuila is of volcanic origin and is characterized by steep mountainsides, small valleys, and a narrow coastal fringe of relatively level land. The island is a narrow mountain range consisting of basic igneous rock with small amounts of andesite and trachyte. The mountains extend approximately 20 miles from east to west. The highest peak is approximately 2,142 feet, and the land slopes steeply from the tops of the mountain ridges down to the ocean (FEMA 2008).

### **4.6.1 Geology and Soils**

Geologic hazards on Tutuila include landslides, volcanic eruptions, earthquakes, cyclones, and tsunamis. Landslides are primarily caused by gravity acting on overly steep slopes. However, many other factors, such as saturation by rainfall, removal of deep-rooted vegetation, and erosion by water channels, contribute to the occurrence of landslides. On Tutuila, landslides often occur when heavy rainfall saturates unstable earth on the island's steep slopes (FEMA 2008).

The only active volcano in the American Samoa region is the volcanic seamount Vanilulu'u located approximately 100 miles east of Tutuila. The Ofu-Olosega volcano last erupted in 1866,

and other volcanoes in the region have been silent for thousands of years. No active volcanoes exist on the island; however, many craters are still visible on the landscape (FEMA 2008).

Earthquakes in American Samoa mainly originate from the Tonga Trench, approximately 120 miles southwest of Tutuila. The Tonga Trench is located where the Pacific and Australian tectonic plates collide. The trench is considered an area of high seismic activity and generates large but distant earthquakes that are felt on Tutuila. Such earthquakes can be precursors to volcanic activity but generally do not present a seismic threat to the islands (FEMA 2008). Tsunamis (huge water waves) that affect Tutuila are generated by earthquakes from fault movements along the Tonga Trench, the Pacific Rim in the Aleutian Islands, South America, and other locations. In 1868 and 1960, tsunamis originating in Chile caused damage in the Samoan Islands. The tsunami that hit American Samoa in 2009, as a result of an earthquake that occurred along the Tonga Trench, resulted in widespread destruction including severe damage to the existing Le'Atele Elementary School campus. The National Oceanic and Atmospheric Administration and National Weather Service operate the Pacific Tsunami Warning Center, which monitors sudden earth movements throughout the Pacific Basin. Warnings are broadcast by the news media on radio and television (FEMA 2008).

U.S. Soil Conservation Service (National Resources Conservation Service) identified five different soil classifications for lands within the Fagasa watershed, including Aua very stony silty clay loam; Aua very stony silty clay loam – steep; Fagasa family-Lithic Hapludolls – Rock outcrop assoc.; Leafu stony silty clay; and Urban Land-Ngedebus complex (ASEPA and ASCMP 2000).

A smaller area upslope of Le'Atele Elementary School contains Leafu stony silty clay soil, which is a deep soil typically extending up to 60 inches in depth. Its permeability ranges between 2 and 6 inches per hour and runoff from this soil is generally slow. Although the potential for soil erosion is limited, this soil is typically subject to brief periods of flooding after heavier rainfall periods. Most of the inhabited shoreline and village areas of Fagasa (including the proposed site) are characterized by Urban Land-Aua-Leafu complex soils. This soil type represents a combination of Aua and Leafu soils, and is typically found at depths of 60 inches or more. The permeability of this soil is moderately rapid and ranges between 2 and 6 inches per hour. The soil has limited to moderate potential for runoff and slight to moderate potential for erosion (ASEPA and ASCMP 2000).

The entire Le'Atele school campus is shown on ASDOC landslide risk maps as having low risk for landslides; but the campus is located just east of a landslide high risk zone on the adjacent slopes of Fuaau Ridge (ASDOC GIS 2013).

### **Alternative 1: No Action**

Under the No Action Alternative, geologic conditions on the project site would remain the same as they are under existing conditions; therefore, no project-related impacts would occur. Additionally, no ground-disturbing activities would occur as a result of the No Action Alternative; therefore, the No Action Alternative would have no direct impacts to existing soils.

### **Alternative 2: Proposed Action**

The Proposed Action would entail soil disturbance through grading and vegetation removal. Construction activities could cause compaction and leave soils exposed and susceptible to water and wind erosion. To minimize potential erosion caused by construction activities, ASDOE would prepare and implement an erosion control plan. The erosion control plan would include phased construction to minimize the amount of exposed soil at any given time and would require all work to cease during heavy rains. The plan would require that all soil stockpiled on-site for use as fill, or that has been excavated from the project area, be covered and surrounded by a sediment barrier to prevent sediment loss.

Additionally, the plan would include a debris disposal plan to ensure that all excavated material is transferred to a designated and preapproved debris disposal site as described in ASEPA's American Samoa Erosion & Sediment Control Field Guide (ASEPA and ASCMP 2011) and the ASEPA Guidance Manual for Runoff Control (ASG and ASEPA 2001). ASDOE would also implement permanent erosion control measures as described in the American Samoa Erosion & Sediment Control Field Guide, where appropriate, when construction is completed (ASEPA and ASCMP 2011).

ASDOE would require preparation of an engineering-level geotechnical investigation prior to project design to identify any unforeseen geological conditions such as expansive soils that would affect the Proposed Action. The geotechnical investigation will identify engineering measures in the foundation and structural design needed to account for the presence of erodible or unstable soils. ASDOE would require the project architect and civil engineer to design the project to mitigate any adverse geological or soil conditions identified in the geotechnical report.

Implementation of the measures stated above would ensure that the Proposed Action would not result in any adverse effects on the geology or soils of the project site.

#### **4.6.2 Seismicity**

FEMA classifies the island of Tutuila as Seismic Zone 3, meaning it will experience earthquake ground shaking of approximately 0.2g peak horizontal acceleration (where g is the unit used to

express gravitational force) and has a 1 in 500 chance per year of sustaining light to moderate building damage (i.e., a 10 percent probability of experiencing ground shaking of at least 0.2g every 50 years). This Seismic Zone 3 designation considers all probable earthquake sources affecting American Samoa, local and distant, and translates their effects into different estimates of ground shaking (Territorial Emergency Management Coordinating Office 2008). EO 12699, Seismic Safety of Federal and Federally Assisted or Regulated New Building Construction, requires construction of new buildings to meet standards for seismic safety set by the National Earthquake Hazard Reduction Program. This EO applies to the construction of new buildings, which are defined as structures used or intended for sheltering persons or property.

#### **Alternative 1: No Action**

Under the No Action Alternative, no construction would occur and existing site conditions would remain the same as they are under existing conditions; therefore, no impacts would occur. The existing temporary structures would remain subject to seismic conditions.

#### **Alternative 2: Proposed Action**

Under the Proposed Action, the potential for volcanic eruptions, earthquakes, and tsunamis in the project area would remain unchanged. An earthquake of 0.2g is unlikely to affect the proposed project. In addition, the proposed structures would be appropriately designed and constructed to current building standards set by the National Earthquake Hazard Reduction Program for local site conditions (including soil type). The proposed structure would be constructed to adhere to the relevant local building codes with respect to seismic safety to minimize potential effects due to strong ground shaking.

### **4.7 Land Use and Planning**

American Samoa's 2003 Territorial General Plan presents a policy agenda for development, but it does not provide geographically specific land uses or prescribe geographically specific land use zones in the manner of a typical city or county comprehensive or master plan. The Territorial General Plan incorporates specific master and comprehensive plans where they exist, such as the 2003 Pago Pago Bay Shoreline Development Plan or the 1999 Port Master Plan (ASG 2008). A major reason for the lack of territory-wide, comprehensive land-use planning and zoning is that over 96 percent of the land in American Samoa is owned in a traditional communal manner, where the village chief [*matai*] regulates the occupancy and use of land within his/her village (FEMA 2008).

Land use in American Samoa is regulated by the ASCMP, which evaluates and restricts incompatible development in areas subject to natural hazards including flooding, storm surge, tsunami, landslide, coastal erosion, and salt water intrusion (ASG 2008). To determine

compliance with the ASCMP, all projects involving ground disturbance require that a LUP Application be submitted for review under the PNRS. In addition to evaluating land use for natural hazards, the PNRS reviews permit applications for compliance with building codes, environmental regulations, infrastructure/utility requirements, historic preservation and public health regulations, and recreational/shoreline accessibility (FEMA 2010).

**Alternative 1: No Action**

Under the No Action Alternative, no new facilities would be built and no existing facilities would be modified; therefore, no impacts to land use would occur and a PNRS review would not be required.

**Alternative 2: Proposed Action**

The Proposed Action, which includes excavation, construction, and staging areas associated with the new two-story building, would occur on land held by the village of Fagasa. ASDOE would request and obtain permission from the Fagasa village chief to complete the Proposed Action. ASDOE would be responsible for initiating and facilitating the PNRS approval process, and would coordinate with the village chief to obtain written agreement from all landowners directly affected by the Proposed Action. Since the Proposed Action would occur on ASDOE property, no changes in land ownership would occur, and no land transfers would be necessary (Image 8).



Image 8: View facing southeast to the proposed building site. Men in photo (left to right) are standing at location of northeast, southeast, and southwest corners of proposed building.



Implementation of the Proposed Action would not modify existing land use in or around the project area. In addition, ASDOE would be responsible for applying for and obtaining PNRS approval. The proposed building would be constructed on the eastern portion of a level area of turf grass, which is currently being used for informal recreational purposes by the students. The Proposed Action would displace part of this use, though there would be ample space for some recreational activities on the remainder of the existing grass area, adjacent to the proposed building. Grass area equal to the footprint of the new building could also be provided west or north of the existing two-story classroom building, depending on the school's programmatic needs. With the provision for an area for informal play equivalent to the area that is being displaced by the Proposed Action, no impacts are anticipated.

## 4.8 Transportation

The site is located at the edge of a low density developed area that does not experience heavy traffic conditions. Most roads in the vicinity of the project area are unpaved. An unnamed paved road abutting the northern edge of the Le'Atele school campus runs along the shoreline of the bay, providing vehicular access to the project area from the village of Fagasa to the east, where it connects to the only paved road leading over a steep mountain ridge to Pago Pago. There are no specifically delineated roads or driveways on the school grounds, and parking areas are not formally defined. Parking occurs informally throughout the school grounds.

### **Alternative 1: No Action**

Under the No Action Alternative, no construction would occur; therefore, no impacts would occur to the existing transportation system.

### **Alternative 2: Proposed Action**

Implementation of the Proposed Action would result in temporary, minor impacts to transportation during the construction of the new school campus. The Proposed Action would result in temporary increases in local traffic due to construction-related traffic. Construction hauling and equipment delivery would occur via the singular paved road between Fagasa and Pago Pago. To minimize potential adverse impacts to traffic and circulation during construction, ASDOE would require the contractor to implement the following mitigation measures:

- ASDOE would stage construction equipment, materials, and vehicles to minimize hindrances to traffic flow.
- ASDOE would provide advance written notice of the construction schedule to all residents who would have limited access to their homes or driveways during construction. The written notification would identify a local contact person with ASDOE.

- ASDOE would review traffic patterns to determine if and when traffic restrictions would be required during construction.

Implementation of these measures would ensure the Proposed Action would not result in adverse effects with respect to traffic. The Proposed Action would not result in a permanent increase in vehicular traffic associated with the operations of the replacement school buildings, as traffic is expected to be similar to that which existed at the Le'Atele Elementary School prior to the disaster.

## 4.9 Noise

The project area currently experiences a minor amount of occasional noise typically associated with an elementary school and a small residential village, including from sound generated by vehicular traffic, human voices, and equipment operation. There are no major noise-generating sources in the project area.

### **Alternative 1: No Action**

Under the No Action Alternative, no construction would occur and noise would remain at current levels; therefore, no impacts would occur to existing noise-sensitive receptors.

### **Alternative 2: Proposed Action**

Implementation of the Proposed Action would result in temporary construction noise that could adversely affect nearby sensitive receptors, including residents and students. However, the noise would be temporary and limited to the duration of project construction, which would occur over a period of approximately 8 months. Construction operations, including maintenance activities and transportation of materials, would generally occur between 7:00 a.m. and 5:00 p.m. Monday through Friday, though some work outside those times may be necessary. Any deviation from this schedule would require ASDOE to contact the *matai* of the village of Fagasa and nearby residents within 24 hours of this work to notify them of the anticipated construction schedule.

To reduce the temporary impacts from construction-related noise, ASDOE would require the contractor to implement the following measures to reduce noise levels to the extent practicable:

- All noise-producing project equipment and vehicles using internal combustion engines (including haul trucks) would be fitted with mufflers; air-inlet silencers, where appropriate; and any other appropriate shrouds, shields, or other noise-reducing features. These devices would be maintained in good operating condition to meet or exceed original factory specifications. Mobile or fixed "package" equipment (e.g., arc welders or air

compressors) would be equipped with the shrouds and noise control features that are readily available for that type of equipment.

- All mobile or fixed noise-producing equipment used on the project site that is regulated for noise output by a local, territorial, or federal agency would comply with such regulation while used in the course of project activity.
- At least 20 days prior to the commencement of construction, ASDOE would provide written notification to property owners and residents within 500 feet of the project area and to the *matai* of the village of Fagasa. A notice would also be posted at the construction site. The notice would provide a construction schedule, the required noise mitigation measures for the project, and the name and telephone number of the project manager who can address questions and problems that may arise during construction.
- The use of noise-producing signals, including horns, whistles, alarms, and bells, would be for safety warning purposes only.

Noise levels would generally return to pre-construction levels after construction is complete. The long-term noise associated with the replacement of school structures would be commensurate with pre-disaster school activities on the campus.

The Proposed Action would therefore result in short-term construction impacts and negligible long-term operational impacts to noise levels that would not be considered significant with implementation of the mitigation measures identified above.

#### 4.10 Utilities

Electricity is provided to the existing school by ASPA via above-ground lines. Water service to the existing school is provided by an ASPA satellite water system serving the village of Fagasa, which is fed by two groundwater wells and Agasii Stream. The village of Fagasa does not have a central sewer system. Wastewater service at the school is provided by a soil-based treatment system maintained by ASDOE.

##### **Alternative 1: No Action**

Under the No Action Alternative, no construction would occur; therefore, no impacts would occur to existing utilities. The temporary structures, which lack connection to water and wastewater facilities, would remain in operation.

##### **Alternative 2: Proposed Action**

As part of the Proposed Action, all utilities, such as power, telephone, water, and sewer would be provided via connection points to existing utility services on the school campus. The

Proposed Action would not result in an increase in demand for these services because the proposed structure would return the school back to its pre-disaster capacity and would not entail increases in student enrollment or staffing. Therefore, there would be no impact on utilities.

#### **4.11 Socioeconomics/Environmental Justice and Public Safety**

According to the 2000 Census of American Samoa (U.S. Census Bureau 2012), the population of the village of Fagasa (Census Tract 9509) is 4,312, which is 8 percent of the population of American Samoa (57,291). The Census indicates that 51 percent (2,206) of the village population is male, and 87 percent (3,745) is ethnic Samoan (one ethnicity). The median age is 21.5 years, and 1,253 members of the village population aged 16 or older are employed. The primary industry for the employed population of the territory is manufacturing (28 percent), although a significant section of the population works in educational, health and social services (17 percent), public administration (12 percent), and retail trade (11 percent). The village has 740 housing units, of which 712 are occupied. The average household size is 6.06 people. The median household income is \$18,889. EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low- Income Populations, requires federal agencies to make achieving environmental justice part of their missions by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations (FEMA 2008). The population of American Samoa is generally highly homogeneous regarding ethnicity and income levels.

Potential public safety hazards include hazardous materials that pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of or otherwise managed. The Resource Conservation and Recovery Act (RCRA) provides USEPA the authority to control hazardous wastes from the "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. The RCRA also sets forth a framework for the management of nonhazardous wastes. In addition, the Hazardous Materials Branch of ASEPA regulates the importation, storage, and disposal of hazardous materials and waste. In addition, ASEPA may prohibit such generation, transportation, storage, or disposal if it is determined that these activities will endanger public health and safety or the environment, or where such activities are not performed in accordance with the regulations set forth in Title 24 of the American Samoa Code Annotated (ASEPA 2011).

American Samoa is subject to natural disasters including cyclones, earthquakes, and tsunamis. Over the past 50 years, seven major cyclones have struck American Samoa, ranging in intensity from Category 2 to Category 5, and resulting in a combined total of 115 fatalities.

### **Alternative 1: No Action**

Under the No Action Alternative, no construction activities would occur and conditions at the project site would remain the same as they are under existing conditions; therefore, there would be no impacts to minority or low-income populations and no changes to the social or economic character of the community. The existing temporary structures would remain, resulting in potential public safety hazards in the event of a tsunami or cyclone because those structures were not meant for permanent use nor were they installed to meet current codes and standards.

### **Alternative 2: Proposed Action**

Implementation of the Proposed Action would not result in changes to the socioeconomic character of the community. The Proposed Action would replace the damaged school buildings with replacement facilities that would be constructed to current codes and standards at an equivalent size, resulting in the socioeconomic benefit to the village. The Proposed Action would not permanently increase the number of residents in the project vicinity and would not generate additional demand for housing or jobs. Additionally, the Proposed Action would not have disproportionately high and adverse effects on minority or low-income populations. Thus, the Proposed Action would comply with EO 12898 and would not result in long-term adverse socioeconomic and public safety impacts.

Construction activities would involve the limited transportation, storage, usage, and disposal of hazardous, explosive, reactive, or other dangerous materials on a temporary basis. Small quantities of these materials, such as gasoline and diesel fuel, would be used to power equipment during construction and maintenance activities. All construction activities involving the transportation, usage, and disposal of regulated materials would be subject to federal and local health and safety requirements. ASDOE would require the construction contractor to prepare a Minor Spill Response Plan that presents the procedures and protocols utilized in the event of a spill resulting from the activities associated with the construction and installation of the proposed school facilities. The plan would be reviewed and approved by the Hazardous Materials Branch of ASEPA prior to notice to proceed for project construction. Adherence to this plan would ensure that the Proposed Action would not result in an adverse public safety effect due to hazardous or other regulated, dangerous materials.

## **4.12 Visual Resources**

Located across the shoreline road along Fagasa Bay to the north, the project site is currently developed with existing school structures and is bordered by dense vegetation to the south, the steep Fuaau Ridge to the west, and several residential buildings to the east. The existing site of the proposed building is characterized by a level grass field adjacent to an existing two-level

school structure. Viewers of the project area consist primarily of the school students and staff, and nearby residents and visitors to the residences in the immediate vicinity (Image 9).



Image 9: Views to project site from residences to the east of the campus are partially obscured by vegetation.

#### **Alternative 1: No Action**

Under the No Action Alternative, no construction would occur and no new facilities would be built; therefore, no impacts would occur to existing visual resources.

#### **Alternative 2: Proposed Action**

The Proposed Action would have temporary impacts on the visual character of the project area. Construction activities would be visible from nearby residences and roads. The viewers who would be directly affected by the short-term construction activities would be the students and school staff, and the small number of residents located adjacent to the project area and their house guests.

The Proposed Action would have negligible long-term impacts on visual resources, as the general project area is already developed with some existing school structures and is replacing facilities that were previously located on the school grounds. The visible improvements would include a two-level structure adjacent to an existing two-level structure. The new building and the existing building would be connected by a concrete walkway on the first floor, and an elevated walkway at the second floor level. Additionally, an exterior ramp and stairway leading to the second story would be visible. The proposed structure would not obstruct existing views to Fagasa Bay from nearby residences and to Fuaau Ridge from the paved shoreline roadway,

due to the structure's location and distance from these receptors. Therefore, implementation of the Proposed Action would not result in adverse impacts to existing visual resources.

#### **4.13 Cumulative Impacts**

CEQ defines a cumulative impact as “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions...” (40 CFR Part 1508.7). The pace of growth and development in American Samoa has historically been very slow. There are no known development projects that have been proposed or approved for the village of Fagasa. Two additional tsunami-related reconstruction efforts elsewhere on the island are proposed for FEMA funding. These include another school reconstruction project located in Fagali'i, approximately 7 miles west of the Proposed Action, and reconstruction of the Satala power plant at one of five alternative sites on the western side of Pago Pago Harbor, ranging from 1.5 miles to 3 miles northeast of the Proposed Action. Due to the distance and geographical separation of these cumulative projects from the proposed Le'Atele site, there are no cumulative impacts to consider.

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# 5.0 Public Participation and Agency Coordination

FEMA is the federal agency responsible for conducting the NEPA compliance process for the proposed project. It is the federal agency's responsibility to expedite the preparation and review of NEPA documents in a way that is responsive to the needs of Fagasa and American Samoa residents while meeting the spirit and intent of NEPA and complying with all NEPA provisions.

FEMA, with the assistance of ASDOE and TOFR, conducted an informal scoping program at the beginning of the NEPA review process. ASDOE and FEMA met with representatives of the following PNRS agencies and organizations on April 19, 2012, to gather their input on this project: ASPA, ASEPA, ASHPO, ASDPW, and ASDMWR.

TOFR, with support from FEMA, published (in both English and Samoan) a Public Scoping Notice in the Samoa News newspaper (with a circulation area covering all of American Samoa) on August 24 and August 25, 2012. The Public Scoping Notice indicated a public comment period ending 30 days following publication of the notice. A copy of the published notice is provided in Appendix B. The Public Scoping Notice was also distributed to involved or interested representatives of the Federal Government, the American Samoa Government, and the private sector. A copy of the Distribution List for the Public Scoping Notice is provided in Appendix B.

No comments were received by FEMA in response to the Public Scoping Notice during the 30-day public comment period.

TOFR, with support from FEMA, published (in both English and Samoan) a Notice of Availability (NOA) of the Draft EA in the Samoa News newspaper on June 7 and June 8, 2013. The NOA of the Draft EA indicated a 14-day public comment period ending June 21, 2013. As detailed in the NOA, the Draft EA document was made available for public review and comment at two physical locations in American Samoa (TOFR's office on Ili'ili Road and ASDOE's office in Utulei) as well as on [FEMA's website at http://www.fema.gov/library/viewRecord.do?id=7560](http://www.fema.gov/library/viewRecord.do?id=7560). A copy of the published NOA is provided in Appendix C. The NOA of the Draft EA was also distributed to involved or interested representatives of the Federal Government, the American Samoa Government, and the private sector. A copy of the Distribution List for the NOA is included in Appendix C.

During the public comment period, FEMA solicited written comments on the Draft EA, which were to be addressed to:

FEMA EHP Le'Atele, 1111 Broadway, Suite 1200, Oakland, California 94607 or  
[email to: fema-rix-ehp-documents@fema.dhs.gov](mailto:fema-rix-ehp-documents@fema.dhs.gov)

FEMA received one comment letter during the public review and comment period, which was provided by the National Oceanic and Atmospheric Administration's National Marine Fisheries Service, Pacific Islands Regional Office Habitat Conservation Division, American Samoa Field Office. This letter is included in Appendix C. At the end of the public review and comment period, FEMA reviewed all comments and prepared this Final EA specifically to address those comments as part of the decision-making process. This Final EA will be made available to all parties notified of the Draft EA (as listed in Appendix C); its availability will also be advertised in the *Samoa News*.

# 6.0 References

All photographs in this document are courtesy of AECOM 2011 and 2012 except where otherwise noted.

American Samoa Department of Commerce (ASDOC). 2013. Available at ASDOC website <http://www.spc.int/prism/country/as/stats/IndexCSSDOC.htm#>. Last accessed January 8, 2013.

ASDOC Geographic Information System (GIS). 2012. Tutuila & Aunu'u Wetland Map. Available at ASDOC Web Portal <http://gis.asascience.com/samoa24/>. Last accessed November 13, 2012.

ASDOC Geographic Information System (GIS). 2012. Data for American Samoa Wetlands and Coral Reefs. Available at ASDOC Web Portal <http://gis.asascience.com/samoa24/>. Last accessed February 20, 2012.

ASDOC Geographic Information System (GIS). 2013. Data for Landslide Risk. Available at ASDOC Web Portal <http://gis.asascience.com/samoa24/>. Last accessed May 20, 2013.

American Samoa Environmental Protection Agency (ASEPA). 2011. List of Major Environmental Regulations. Available at ASEPA website <http://asepa.gov/list-of-regulations.asp>. Last accessed January 19, 2013.

American Samoa Environmental Protection Agency (ASEPA) and American Samoa Coastal Zone Management Program (ASCMP). 2000. *American Samoa Watershed Protection Plan. Volume 1: Watersheds 1-23*. Prepared by: Pedersen Planning Consultants. January.

American Samoa Environmental Protection Agency (ASEPA) and American Samoa Coastal Zone Management Program (ASCMP). 2011. *American Samoa Erosion & Sediment Control Field Guide, Version 1.0 for Contractors and Site Inspectors*. Prepared by Horsley Witten Group, Inc. May.

American Samoa Government (ASG). 2008. *American Samoa Revision and Update of the Territory Hazard Mitigation Plan*. April 28.

American Samoa Government (ASG) and American Samoa Environmental Protection Agency (ASEPA). 2001. *Guidance Manual for Runoff Control: Preventing Erosion, Sedimentation, and Pollution of Receiving Waters in American Samoa*. Prepared by R.M. Towill Corporation. October.

Brainard, R. 2008. *Coral Reef Ecosystem Monitoring Report for American Samoa: 2002 – 2006*. National Oceanic and Atmospheric Administration, Pacific Islands Fisheries Science Center, Coral Reef Ecosystem Division, Special Report.

Blyth-Skyrme, V.J., J. J. Rooney, F. A. Parrish, and R. C. Boland. 2013. Mesophotic coral ecosystems – potential candidates as essential fish habitat and habitat areas of particular concern. Pacific Islands Fish. Sci. Cent., Natl. Mar. Fish. Sci. Cent. Admin. Rep. H-13-02, 53 p.

Clark, Jeffrey, and David Herdrich. 1993 Prehistoric Settlement System in Eastern Tutuila, American Samoa. *Journal of Polynesian Society*. 102(2): 147–185.

Coles, S.L., P.R. Reath, P.A. Skelton, V. Bonito, R.C. DeFelice, and L. Basch. 2003. Introduced Marine Species in Pago Pago Harbor, Fagatele Bay and the National Park Coast, American Samoa. Pacific Biological Survey, Bishop Museum Technical Report No. 26. December.

Council on Environmental Quality (CEQ). 2010. *Draft NEPA Guidance on Consideration of the Effects of Climate Change and Greenhouse Gases*. February.

Craig, P., ed. 2005. *Natural History Guide to American Samoa*. 2<sup>nd</sup> Edition. National Park of American Samoa and Department of Marine and Wildlife Resources.

CSREES Southwest States and Pacific Islands Regional Water Quality Program. 2004. American Samoa Water Quality Projects. Available at American Samoa Water Quality website [http://www.ctahr.hawaii.edu/rwq/american\\_samoa/projects.htm](http://www.ctahr.hawaii.edu/rwq/american_samoa/projects.htm). Last accessed January 11, 2008.

Federal Emergency Management Agency (FEMA). 2005. *Summary of Coastal Construction Requirements and Recommendations*. Home Builders Guide to Coastal Construction FEMA 499 Technical Fact Sheet No. 2. August.

Federal Emergency Management Agency (FEMA). 2006. Flood Insurance Rate Map. Map Number 6000010078C. Map revised July 17, 2006.

Federal Emergency Management Agency (FEMA). 2008. *Fagatogo Stormwater Modification Final Environmental Assessment (FEMA-1506-DR-AS, HMGP #1506-4)*. Prepared by URS Corporation, Oakland, CA.

Federal Emergency Management Agency (FEMA). 2009. *Subgrant Application RLWE015 Le'Atele Elementary School Buildings #s 0094, 0095, 0087 (PA-09-AS-1859-PW-00193(0))*.

Federal Emergency Management Agency (FEMA). 2010. *Permanent Housing Construction Draft Environmental Assessment (FEMA-1859-DR-AS)*. Prepared by URS Corporation, Oakland, CA.

Federal Emergency Management Agency (FEMA). 2011. *Coastal Construction Manual - Principles and Practices of Planning, Siting, Designing, Constructing, and Maintaining Residential Buildings in Coastal Areas (Fourth Edition)*, FEMA P-55.

Federal Emergency Management Agency (FEMA). 2013. *Cultural Resources Inventory Report, Le'Atele Elementary School Buildings Replacement, Territorial Office of Fiscal Reform and American Samoa Department of Education, FEMA-DR-1859-AS*. Prepared by AECOM. April.

Governor of American Samoa. 2006. Executive Order No. 004-2006, Territory of American Samoa Floodplain Management Regulations. July.

Governor of American Samoa. 2007. Executive Order No. 010A-2007, Commitment to Ameliorate Global Climate Change and Its Negative Effects On the Territory. August.

Intergovernmental Panel on Climate Change (IPCC). 2007. *Climate Change 2007 – Synthesis Report*. IPCC Fourth Assessment Report.

National Marine Fisheries Service and U.S. Fish and Wildlife Service (NMFS and USFWS). 1998a. *Recovery Plan for U.S. Pacific Populations of the Hawksbill Turtle (Eretmochelys imbricata)*. National Marine Fisheries Service, Silver Spring, MD.

National Marine Fisheries Service and U.S. Fish and Wildlife Service (NMFS and USFWS). 1998b. *Recovery Plan for U.S. Pacific Populations of the Green Turtle (Chelonia mydas)*. National Marine Fisheries Service, Silver Spring, MD.

National Marine Fisheries Service and U.S. Fish and Wildlife Service (NMFS and USFWS). 1998c. *Recovery Plan for U.S. Pacific Populations of the Leatherback Turtle (Dermochelys coriacea)*. National Marine Fisheries Service, Silver Spring, MD.

National Marine Fisheries Service and U.S. Fish and Wildlife Service (NMFS and USFWS). 1998d. *Recovery Plan for U.S. Pacific Populations of the Loggerhead Turtle (Caretta caretta)*. National Marine Fisheries Service, Silver Spring, MD.

National Marine Fisheries Service and U.S. Fish and Wildlife Service (NMFS and USFWS). 2011. Pacific Region: Pacific Islands Fish and Wildlife Office. Endangered Species in the Pacific Islands: Threatened and Endangered Species. Available at Pacific Islands Fish and Wildlife Office website <http://www.fws.gov/pacificislands/teslist.html>. Last accessed November 28, 2011.

National Marine Fisheries Service and U.S. Fish and Wildlife Service (NMFS and USFWS). 2012. The Green Book Nonattainment Areas for Criteria Pollutants. Available at USEPA Green Book website <http://www.epa.gov/air/oaqps/greenbk/index.html>. Last accessed November 13, 2012.

National Marine Fisheries Service and U.S. Fish and Wildlife Service (NMFS and USFWS). 2013. *National Marine Fisheries Service Comment Letter on the Draft Environmental Assessment, Le'Atele Elementary School Buildings Replacement*. Emailed comments received on June 21, 2013.

Territorial Emergency Management Coordinating Office. 2008. American Samoa Revision and Update of the Territory Hazard Mitigation Plan. Pago Pago, AS. Prepared by American Samoa Disaster Recovery Office, Pago Pago, AS, and Jamie Caplan Consulting LLC, Northampton, MA.

Tuato'o-Bartley, N., T.E. Morrell, and P. Craig. 1993. Status of Sea Turtles in American Samoa in 1991. *Pac. Sci.* 47:215–221.

U.S. Census Bureau. 2012. American FactFinder. Census 2000. Available at Census Bureau website <http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml#none>. Last accessed November 14, 2012.

U.S. Environmental Protection Agency (USEPA). 2007. *Climate Change and Interacting Stressors: Implications for Coral Reef Management in American Samoa*. Global Change Research Program, National Center for Environmental Assessment, Washington, DC; EPA/600/R-07/069. Available from the National Technical Information Service, Springfield, VA, and online at USEPA website <http://www.epa.gov/ncea>. Last accessed May 20, 2013.

U.S. Fish and Wildlife Service (USFWS). 2011. Pacific Islands – Endangered Species. Threatened and Endangered Animal and Plant Species Listing for Guam, Northern Mariana Islands and American Samoa. Available at USFWS website [http://library.fws.gov/refuges/pacificislands\\_eslist.pdf](http://library.fws.gov/refuges/pacificislands_eslist.pdf). Last accessed November 28, 2011.

Whistler, W. A. 1994. *Botanical inventory of the Proposed Tutuila Unit of the National Park of American Samoa*. Coop. National Park Resources Study Unit, Tech. Report #87, Dept. of Botany, Univ. of Hawai'i, Honolulu, Hawai'i. 142 pp.

# 7.0 List of Preparers

## 7.1 Federal Emergency Management Agency

G. Morgan Griffin, Deputy Regional Environmental Officer

Carl M. Nagata, P.E., Task Monitor

Samuel Ronveaux, Public Assistance Branch Chief

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Trina Abbott, Environmental Planner

Jayna Morgan, Environmental Planner

Jane Chang, Environmental Analyst

Jeff Goodson, Environmental Engineer

Alan Avery, Graphics Coordinator

Dao Lee, GIS Specialist

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# Appendices

## Appendix A: Agency Consultation

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**Hon. Lolo Matalasi  
Moliga**  
Governor

**Lemanu Peleti Mauga**  
Lieutenant Governor



**Executive Offices of the Governor  
American Samoa Historic Preservation Office  
American Samoa Government  
Pago Pago, American Samoa 96799**

**David J. Herdrich**  
Historic Preservation Officer

Phone: (684) 699-2316  
Fax: (684) 699-2276

April 29, 2013

068-13HP

Mr. G. Morgan Griffin  
Deputy Regional Environmental Officer  
U.S. Department of Homeland Security  
1111 Broadway, Suite 1200  
Oakland, CA 94607-4052

Re: Le'atele Elementary School  
FEMA-1859-DR-AS, PW 193  
Subgrantee: American Samoa Department of Education

Dear Mr. Griffin: *Morgan*

Thank you for your letter dated April 3, 2013 concerning the Federal Emergency Management Agency's (FEMA) an application to provide funding to the Department of Education (Sub-applicant) through the Territorial Office of Fiscal Reform (TOFR) to restore the function of the Le'atele Elementary School's administrative building in Fagasa, Tutuila Island American Samoa (Undertaking). I have reviewed your letter, the attached report, and offer the following comments.

I concur with your determination of the area of potential effects (APE), as per the documentation included with your letter.

I also concur with your determination historic properties are present or likely present within the APE because it has been previously disturbed and the existing concrete slabs to be used as staging areas are not considered historic properties.

In addition, I concur with your determination of no effect on historic properties because, given FEMA's no historic property determination, there are no historic properties to be affected, with the proviso that if any subsurface historic properties are discovered during ground-disturbing activities that FEMA will stop construction and take necessary measures to avoid or minimize harm to the property in consultation with the American Samoa Historic Preservation Office, pursuant to 36 CFR Part 800.13(d).

Thank you for your time and attention. This information has been provided upon the request of the Federal Emergency Management Agency in order to assist FEMA with its

● Page 2

April 29, 2013

Section 106 responsibilities under the National Historic Preservation Act of 1966, as amended and specified in the 36 CFR § 800 regulations.

If you have any questions concerning this correspondence please do not hesitate to contact me at (684) 699-2316.

Sincerely,

A handwritten signature in black ink that reads "David J. Herdrich". The signature is written in a cursive style with a large, stylized initial "D".

David J. Herdrich  
Historic Preservation Officer

cc: Paula Falk Creech, American Samoa and Micronesia Program Manager, NPS  
Lima Fiatoa, TOFR

U.S. Department of Homeland Security  
Region IX  
1111 Broadway, Suite 1200  
Oakland, CA 94607-4052



**FEMA**

April 3, 2013

Mr. David Herdrich  
Historic Preservation Officer  
American Samoa Historic Preservation Office  
Executive Office of the Governor  
American Samoa Government  
Pago Pago, American Samoa 96799

Re: Le'Atele Elementary School  
FEMA-1859-DR-AS, PW 193  
Subgrantee: American Samoa Department of Education

Dear Mr. ~~Herdrich~~ **David**:

The Department of Homeland Security's Federal Emergency Management Agency (FEMA) proposes to provide financial assistance to the American Samoa Department of Education (ASDOE), through the Territorial Office of Fiscal Reform (TOFR), to restore the function of the Le'Atele Elementary School's administration building, early childhood education (ECE) building, and kitchen/cafeteria building in Fagasa, Tutuila, American Samoa (Undertaking). The Le'Atele Elementary School's administrative building, ECE building, and kitchen/cafeteria building were destroyed during the earthquake, tsunami, and flooding designated a Presidentially declared disaster (FEMA-1859-DR-AS). This letter, supported by the enclosed Cultural Resources Inventory Report, serves as FEMA's request for consultation with your office in compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and its implementing regulations (36 CFR Part 800).

The Undertaking includes construction of a two-story, elevated, multi-use, replacement building within the existing campus and connection to existing utilities. A detailed description of the Undertaking is provided in the enclosed Cultural Resources Inventory Report.

FEMA has determined that the area of potential effects (APE) is defined as a 0.55-acre area potentially subject to ground disturbance. The APE is described in more detail in the enclosed Cultural Resources Inventory Report and shown in Figure 2 of the enclosed Cultural Resources Inventory Report.


Mr. David Herdrich  
April 3, 2013  
Page 2

FEMA's archaeological consultant, AECOM, conducted background and archival research and an archaeological survey in an effort to identify and evaluate historic properties. No historic properties were identified in the APE. Methods and results are documented in the enclosed Cultural Resources Inventory Report.

Based on the results of its identification and evaluation effort, FEMA has determined that implementation of the Undertaking would result in "no historic properties affected". Although the potential is low, unexpected subsurface historic properties could be discovered during ground-disturbing activities. Therefore, ASDOE (including its contractors and agents) would be responsible for halting work in the event of an unanticipated discovery during construction and notifying TOFR and FEMA as soon as practicable. If FEMA determines that the discovery has the potential to be a significant historical property, FEMA would require ASDOE to stop all construction in the vicinity of the discovery and to take all reasonable measures to avoid or minimize harm to the property until FEMA concludes consultation with your office, pursuant to 36 CFR Part 800.13(b).

FEMA requests your review and concurrence regarding these findings. Unless your office objects to FEMA's determinations within 30 days of receipt of this request, FEMA may consider its responsibilities under Section 106 of the NHPA complete and fund the Undertaking. If you have any questions regarding this request or require additional information, please do not hesitate to contact me at (510) 627-7033, [morgan.griffin@fema.dhs.gov](mailto:morgan.griffin@fema.dhs.gov), or the letterhead address.

Sincerely,

  
Digitally signed by Gregory Morgan Griffin  
DN: cn=Gregory Morgan Griffin,  
o=DHS FEMA IS, ou=Recovery - EHP,  
email=morgan.griffin@fema.dhs.gov,  
c=US  
Date: 2013.04.03 15:07:17 -0700

G. Morgan Griffin  
Deputy Regional Environmental Officer

Enclosure

cc: Lima Fiatoa, TOFR

## Appendix B: Public Scoping Notices and Agency Distribution List

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# PUBLIC SCOPING NOTICE

## ENVIRONMENTAL ASSESSMENT

### Le'Atele Elementary School Building Replacement

#### FEMA-1859-DR-AS, PW 193

The American Samoa Department of Education's Le'Atele Elementary School in Fagasa Village was severely damaged by the earthquake, tsunami, and flooding that occurred on September 29, 2009, and was declared a Presidential disaster (FEMA-1859-DR-AS). The event caused structural damage beyond repair to the administration building, the Early Childhood Education building, and the kitchen/cafeteria building. Since the disaster, the Le'Atele school has been operating with temporary buildings. To restore the function of the three destroyed buildings, the American Samoa Department of Education (ASDOE) has requested financial assistance from the Department of Homeland Security's Federal Emergency Management Agency (FEMA). If approved, FEMA would provide financial assistance to ASDOE, through the Territorial Office of Fiscal Reform (TOFR), under the Public Assistance Program. ASDOE is considering a project to meet the need to replace the three buildings damaged by the disaster by constructing a single new building outside of the 100-year floodplain on school property.

Before making any irreversible decisions regarding the project, FEMA must follow the appropriate environmental and historic preservation (EHP) review processes. These EHP reviews include ensuring that the project complies with the requirements of the National Environmental Policy Act (NEPA), the National Historic Preservation Act, Executive Order 11988 on Floodplain Management, and other laws, regulations and executive orders. To meet its NEPA compliance responsibilities, FEMA has initiated preparation of an Environmental Assessment (EA), which will evaluate potential effects to the environment resulting from the project and share this information with interested parties. Obtaining public input through the EA process is a critical element of FEMA's commitment to meeting its EHP compliance responsibilities. Thus, FEMA is providing other governmental agencies, nongovernmental organizations, businesses, and the public the opportunity to participate in the information gathering (scoping) process regarding this project. Specifically, FEMA is seeking input to determine the scope of the EA (including alternatives) and substantial issues to be analyzed in the EA.

Relevant issues identified during the scoping process will be addressed in a Draft EA. When complete, the Draft EA will be submitted for public review and comment. ASDOE, TOFR, and FEMA will review all comments on the Draft EA before making any irreversible decisions regarding the project.

**Comments on this Public Scoping Notice will be accepted until 5:00 p.m. local time on the 30th day following publication of this notice.** Comments may be delivered in the following ways:

**U.S. Mail and Express Delivery:** U.S. Department of Homeland Security  
Federal Emergency Management Agency, Region IX  
Office of Environmental and Historic Preservation  
Attn: Le'atele ES EA  
1111 Broadway, Suite 1200  
Oakland, CA 94607-4052  
fema-rfx-ehp-documents@fema.dhs.gov

**Email:**

**Facsimile:** (510) 627-7138

**Telephone:** (510) 627-7027 (messages only)

## FA'ASILASILAGA FA'ALAUATELE

### FUAFUAGA FA'ATAUTU I LE SIOSIOMAGA

#### TOE FAUSIA O FALE A'OGA A LE'ATELE (FAGASA)

#### FEMA-1859-DR-AS, PW 193

O le A'oga tulaga muamua a Le'atele i le afio'aga o Fagasa, o le Ofisa o A'oga o Amerika Smoa, na matua fa'aleagaina i le mafuf'e, ma le galulolo, i le aso 29 o Setema i le tausaga o 2009, ma na fa'alavelave fa'afuase'i. (FEMA-1859-DR-AS). Na 'avea lea ma mafua'aga na matua fa'aleagaina ai le fa'avae o le fale sa i ai le Ofisa o le a'oga, fale mo a'oga fa'ata'uta'i, umukuka ma le fale sa fa'azoga e taumamafa ai alo ma fanau a le afio'aga o Fagasa. Mai lava i lea taimi, 'ina 'ua mae'a le fa'alavelave fa'afuase'i, sa fa'azoga e le A'oga ni fale le tumau e fa'azou ai a'oga 'a le fanau. Mo le toe fausia o fale'a'oga e tolu, sa fa'aleagaina, sa talosagaina e le vaega o A'oga a le malo o Amerika Smoa, se fesoasoani tau tupe e ala i le vaega o le Homeland Security's Federal Emergency Management Agency (FEMA). Afai e talia le talosaga, ona fa'atupaina lea e le (FEMA) le fesoasoani tau tupe ma tu'uina atu loa i le vaega o A'oga a le malo o Amerika Samoa, e ala atu i le Ofisa o le (TOFR) i lalo o le polokalama o alaga manuia lautele. 'Ua fuafia e le Ofisa o A'oga ni fale'a'oga e fetauti ma le mana'oga, e sui ai fale'a'oga e tolu na fa'atama'ia i le fa'alavelave mata'utia, ma o le 'a fausia i luga o 'ele'ele vailaloa o le lotoa a le a'oga.

A 'o le'i faia se l'uga maumaututu o leni fa'amoemoe, e tarau lava i le FEMA, 'ona amana'ia aialaga ma fuafuaga ua fa'atulaga ma toe iloiloina e le vaega o le si'osi'omaga o fanua fa'asao mo tala fa'asolopito, (EHP). 'O nei iloiloga e aofia ai le maunioa, o fa'atutaia leni galuega, e tusa ma aialaga fa'a-le-mafono ua fa'ata'oto e le Ofisa o le fa'atutaina o le si'osi'omaga, (NEPA), le vaega o nofoaga fa'asao mo tala fa'asolopito (NHPA). Le fa'asinomaga fa'alotoifale (11988) o lau'ele'ele vailaloa, atoa ma isi tulafoano ma aialaga, 'ae maise feutaga'iga ua faia. Ina ia o gatasi ma fuafuaga ma tute o le Matagaluega (NEPA), 'ua taulamua le (FEMA) i le tapenaina ma fa'atulaga su'esu'ega mo le si'osi'omaga (EA), 'e au'ili'ili ai a'ataga patino e mafua mai i leni galuega, ma fa'asoa atu ia fa'amatalaga 'a 'i latou e fa'amau se malamalamaga i ia mata'upu. 'O le mauaina o fesoasoani ma fautuaga mai i le malo ma tagata lautele, e fa'ao' mai i le Ofisa o le (EA), 'o se vaega taua tele i fuafuaga fa'ata'oto'oto a le (FEMA), 'ina 'ia fetauti ma aialaga ma le fa'atinoga o le tautua a le Ofisa (EHP). Ma, ua fa'amatu'u atu e le (FEMA) ni avanoa taua i Ofisa o le malo, fa'alapotopotoga tumu'oti, ma so'o se pisinisi, 'ina ia 'auzi i le tau sa'ilia ma fa'amaopoopoina o fa'amatalaga ma fuafuaga o leni galuega. 'O lo'o tausa'ili pea e le (FEMA) ni fautuaga ma ni fesoasoani e fuafia ai se fa'atulagaga sologa lelei 'o iloiloga, fa'atasi ma ni suiiga talafaeagai i le au'ili'liga o su'esu'ega a le Ofisa.

O ni mata'upu talafaeagai ma logoleleia e mafai 'ona fa'a'iloa i le gasologa o le fa'amoemoe, 'o le a fa'alauloa i le pepa o le iloiloga. A mae'a, 'ona tu'uina atu lea mo se toe iloiloga pe sasa'a fo'i iai le tofa ma le utaga i le manafu lautele o le atunu'u, mo ni fautuaga ma ni teuteuga. 'O le a iloiloga ma silasila toto'a le matagaluega o a'oga, ASDOE, TOFR, ma le FEMA, i fautuaga ma fesoasoani o le a fa'ao' mai, 'a 'o le'i ta mau se fa'a'uga mo leni fa'amoemoe.

**O fa'amatalaga ma fautuaga 'uma i leni polokalama e pei 'ona fa'a'iloa atu, o le a talia ma taulimaina, amata mai i le taimi e fa'alauloa ai leni fa'amoemoe, se'ia fa'agata i le ta tonu o le lima (5:00) i le afiafi o le aso toluasefulu o 'Anukuso.** E mafai ona tuuina mai fa'amatalaga i auala ia ua ta'ua i lalo:

**Meli a le U.S.:** U.S. Department of Homeland Security  
Federal Emergency Management Agency, Region IX  
Office of Environmental and Historic Preservation  
Attn: Le'atele ES EA  
1111 Broadway, Suite 1200  
Oakland, CA 94607-4052  
fema-rfx-ehp-documents@fema.dhs.gov

**Imeli:**

**Facsimile:** (510) 627-7138

**Telefoni:** (510) 627-7027 (na'o fa'amatalaga fa'aleo)



# PUBLIC SCOPING NOTICE

## ENVIRONMENTAL ASSESSMENT

### Le'Atele Elementary School Building Replacement FEMA-1859-DR-AS, PW 193

The American Samoa Department of Education's Le'Atele Elementary School in Fagasa Village was severely damaged by the earthquake, tsunami, and flooding that occurred on September 29, 2009, and was declared a Presidential disaster (FEMA-1859-DR-AS). The event caused structural damage beyond repair to the administration building, the Early Childhood Education building, and the kitchen/cafeteria building. Since the disaster, the Le'Atele school has been operating with temporary buildings. To restore the function of the three destroyed buildings, the American Samoa Department of Education (ASDOE) has requested financial assistance from the Department of Homeland Security's Federal Emergency Management Agency (FEMA). If approved, FEMA would provide financial assistance to ASDOE, through the Territorial Office of Fiscal Reform (TOFR), under the Public Assistance Program. ASDOE is considering a project to meet the need to replace the three buildings damaged by the disaster by constructing a single new building outside of the 100-year floodplain on school property.

Before making any irreversible decisions regarding the project, FEMA must follow the appropriate environmental and historic preservation (EHP) review processes. These EHP reviews include ensuring that the project complies with the requirements of the National Environmental Policy Act (NEPA), the National Historic Preservation Act, Executive Order 11988 on Floodplain Management, and other laws, regulations and executive orders. To meet its NEPA compliance responsibilities, FEMA has initiated preparation of an Environmental Assessment (EA), which will evaluate potential effects to the environment resulting from the project and share this information with interested parties. Obtaining public input through the EA process is a critical element of FEMA's commitment to meeting its EHP compliance responsibilities. Thus, FEMA is providing other governmental agencies, nongovernmental organizations, businesses, and the public the opportunity to participate in the information gathering (scoping) process regarding this project. Specifically, FEMA is seeking input to determine the scope of the EA (including alternatives) and substantial issues to be analyzed in the EA.

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**Comments on this Public Scoping Notice will be accepted until 5:00 p.m. local time on the 30th day following publication of this notice.** Comments may be delivered in the following ways:

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Federal Emergency Management Agency, Region IX  
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Attn: Le'Atele ES EA  
1111 Broadway, Suite 1200  
Oakland, CA 94607-4052
- Email:** fema-rix-ehp-documents@fema.dhs.gov
- Facsimile:** (510) 627-7138
- Telephone:** (510) 627-7027 (messages only)

## FA'ASILASILAGA FA'ALAUATELE

### FUAFUAGA FA'ATATAU I LE SIOSIOMAGA TOE FAUSIA O FALE A'OGA A LE'ATELE (FAGASA) FEMA-1859-DR-AS, PW 193

O le A'oga tulaga muamua a Le'atele i le afio'aga o Fagasa, o le Ofisa o A'oga o Amerika Smoa, na matua fa'aleagaina i le mafu'e, ma le galulolo, i le aso 29 o Setema i le tausaga e 2009, ma na fa'alauiloa ai o se fa'alavelave fa'afuase'i. (FEMA-1859-DR-AS). Na ave'a lea ma mafua'aga na matua fa'aleagaina ai le fa'avae o le fale sa i ai le Ofisa o le a'oga, fale mo a'oga fa'ata'ita'i, umukuka ma le fale sa fa'aoaga e taumamafa ai alo ma fanau a le afio'aga o Fagasa. Mai lava i lea taimi, ina ua mae'a le fa'alavelave fa'afuase'i, sa fa'aoaga e le A'oga ni fale le tumau e fa'avau ai a'oga 'a le fanan. Mo le toe fausia o fale'a'oga e tolu sa fa'aleagaina, sa talosagaina e le vaega o A'oga a le malo o Amerika Smoa, se fesoasoani tau tupe e ala i le vaega o le Homeland Security's Federal Emergency Management Agency (FEMA). Afai e talia le talosaga, ona fa'arupina lea e le (FEMA) le fesoasoani tau tupe ma tu'uina atu loa i le vaega o A'oga a le malo o Amerika Samoa, e ala atu i le Ofisa o le (TOFR) i lalo o le polokalama o alaga manuia lautele. 'Ua fuafua e le Ofisa o A'oga ni fale'a'oga e fetasi ma le mana'oga, e sui ai fale'a'oga e tolu na fa'atama'ia i le fa'alavelave mata'utia, ma o le fa'ausia i fuga o 'ele'ele vailalao o le lotoa a le a'oga.

A'o le'i faia se f'uga maumaututu o leni fa'amoemoe, e tatau lava i le FEMA, 'ona amana'ia aiaiga ma fuafuaga ua fa'atulaga ma toe iloiloina e le vaega o le si'osi'omaga o fanua fa'asao mo tala fa'asolopito, (EHP). 'O nei iloiloga e afia ai le ma'utino'a, o fa'aitautia leni galuega, e tusa ma aiaiga fa'a-le-tulafono ua fa'ata'oto e le Ofisa o le fa'atuaaina o le Si'osi'omaga, (NEPA), le vaega o nofoaga fa'asao mo tala fa'asolopito (MHPA). Le fa'asinomaga fa'alotoifale (11988) o lau'ele'ele vailalao, atoa ma isi tulafono ma alaiga, 'ae maise feutaga'iga ua faa. Ina fa o gatasi ma fuafuaga ma tiute o le Matagaluega (NEPA), 'ua taulamua le (FEMA) i le tapenaina ma fa'atulaga su'esu'ega mo le Si'osi'omaga (EA), 'e au'ili'ili ai a'afiaga patino e mafua mai i leni galuega, ma fa'asoa atu ia fa'amatalaga 'ia' i latou e fia maua se malamalama i ia mata'upu. 'O le mauaina o fesoasoani ma fautuaga mai i le malo ma tagata lautele, e fa'ao'o mai i le Ofisa o le (EA), 'o se vaega taua tele i fuafuaga fa'ata'oto'oto a le (FEMA), 'ina ia fetasi ma aiaiga ma le fa'atinoga o le tauua a le Ofisa (EHP). Ma, ua fa'amatu'u atu e le (FEMA) ni avanoa taua i Ofisa o le malo, fa'alapotopotoga tumu'ou, ma so'o se pisinisi, 'ina ia 'auai i le tau sa'illa ma fa'amaopoopoina o fa'amatalaga ma fuafuaga o leni galuega. 'O le 'o tusa'ili pea e le (FEMA) ni fautuaga ma ni fesoasoani e fuafua ai se fa'atulagaga sologa lelei o iloiloga, fa'atasi ma ni suiiga talafeagai i le au'ili'iliga o su'esu'ega a le Ofisa.

O ni mata'upu talafeagai ma logoleleia e mafai 'ona fa'ailoa i le gasologa o le fa'amoemoe, 'o le a fa'alauiloa i le pepa o le iloiloga. A mae'a, 'ona tu'uina atu lea mo se toe iloiloga pe sasa'a fo'i i ai le tofa ma le utaga i le mamalu lautele o le atunuu, mo ni fautuaga ma ni teuteuga. 'O le a iloiloga ma silasila toto'a le matagaluega o a'oga, ASDOE, TOFR, ma le FEMA, i fautuaga ma fesoasoani o le a fa'ao'o mai, 'a'o le'i ta mau se fa'it'uga mo leni fa'amoemoe.

O fa'amatalaga ma fautuaga 'uma i leni polokalama e pei 'ona fa'ailoa atu, o le a talia ma taulimaina, amata mai i le taimi e fa'alauiloa ai leni fa'amoemoe, se'ia fa'agata i le ta'ona o le lima (5:00) i le afiafi o le aso toluhinefulu o 'Anukuso. E mafai ona tuuina mai fa'amatalaga i atala ia ua ta'ua i lalo:

- Mei i le U.S.:** U.S. Department of Homeland Security  
Federal Emergency Management Agency, Region IX  
Office of Environmental and Historic Preservation  
Attn: Le'Atele ES EA  
1111 Broadway, Suite 1200  
Oakland, CA 94607-4052
- Imeli:** fema-rix-ehp-documents@fema.dhs.gov
- Facsimile:** (510) 627-7138
- Telefoni:** (510) 627-7027 (vava fa'amatalaga fa'aleo)

## Le'Atele Elementary School Buildings Replacement Environmental Assessment Scoping Process Distribution List

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## Appendix C: Notice of Availability of Draft Environmental Assessment, Distribution List, and Comments Received During Comment Period

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**TERRITORIAL OFFICE OF FISCAL REFORM  
OFFICE OF THE GOVERNOR  
AMERICAN SAMOA GOVERNMENT**

## **NOTICE OF AVAILABILITY**

### **Draft Environmental Assessment Le'atele Elementary School Buildings Replacement FEMA-1859-DR-AS, PW 193**

The American Samoa Department of Education's Le'atele Elementary School in Fagasa Village was severely damaged by the earthquake, tsunami, and flooding that occurred on September 29, 2009, and was declared a Presidential disaster (FEMA-1859-DR-AS). To restore the function of three destroyed buildings (the administration building, the Early Childhood Education building, and the kitchen/cafeteria building), the American Samoa Department of Education (ASDOE) has requested financial assistance from the U.S. Department of Homeland Security's Federal Emergency Management Agency (FEMA). If approved, FEMA would provide financial assistance to ASDOE, through the Territorial Office of Fiscal Reform (TOFR), under FEMA's Public Assistance Program.

ASDOE proposes to replace the three buildings damaged by the disaster by constructing a new, two-story, 4000-square-foot building southwest of the existing, two-story, school building. The new building would be constructed to current codes and standards, including floodplain management requirements, which would result in the lowest floor being elevated above the height of the modeled 100-year flood.

FEMA has prepared a Draft Environmental Assessment (DEA) in compliance with the National Environmental Policy Act, as amended, and applicable implementing regulations. The DEA evaluates the environmental impacts of ASDOE's proposed project and alternatives. FEMA has made the DEA available for public review and comment at <http://www.fema.gov/library/viewRecord.do?id=7560> and the following locations: TOFR's office on Ili'ili Road (call 699-1330 for location information) and ASDOE's main office in Utulei (call 633-5237 for location information).

FEMA, TOFR, and ASDOE will consider all comments on the DEA before making decisions regarding ASDOE's proposed project. Comments relevant to the DEA should be provided in writing to FEMA Region IX, EHP / Le'atele ES DEA, 1111 Broadway, Suite 1200, Oakland, CA 94607-4052 or [fema-rix-ehp-documents@fema.dhs.gov](mailto:fema-rix-ehp-documents@fema.dhs.gov). Questions regarding the DEA or its availability can also be made by telephone at (510) 627-7027 (messages only). To be considered in the decision-making process, comments on the DEA must be received by midnight June 21, 2013.

## **AVANOA MO FA'ASILASILAGA FA'ALAUATELE**

### **Fuafuaga Fa'ata'ita'i mo le Si'osi'omaga Suiga Fou o le Fale A'oga a Le'alatele Tulaga Muamua FEMA-1859-DR-AS, PW 193**

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O le Matagaluega a le Ofisa o Aoga a Amerika Samoa ua fuafua e toe fa'afuina fale aoga e tolu na afaina i le faalavelave mata'utia fa'anatura i le toe fausiaina lea o se fale fogafalelua, e 4000-sikuea-futu le fale i sauteisisifo o le tulaga o iai le fogafalelua o le fale a'oga. O le fale fou o le a galueaina i tulafono ma 'aiaiga o iai nei, e aofia ai fuafuaga e tatau ona iai mo tafega ma lologa, i le mafai e ala mai i le aupito mauualalo o le fola na si'i a'e i le maualuga o le fua o lologa e 100-tausaga.

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**TERRITORIAL OFFICE OF FISCAL REFORM  
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AMERICAN SAMOA GOVERNMENT**

## **NOTICE OF AVAILABILITY**

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FEMA has prepared a Draft Environmental Assessment (DEA) in compliance with the National Environmental Policy Act, as amended, and applicable implementing regulations. The DEA evaluates the environmental impacts of ASDOE's proposed project and alternatives. FEMA has made the DEA available for public review and comment at <http://www.fema.gov/library/viewRecord.do?id=7560> and the following locations: TOFR's office on Ili'ili Road (call 699-1330 for location information) and ASDOE's main office in Utulei (call 633-5237 for location information).

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## **AVANOA MO FA'ASILASILAGA FA'ALAU'ITELE**

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O le a iloiloaina e le FEMA, TOFR, ma le ASDOE ia fautuaga uma mo Fuafuaga Fa'atatau o le Si'osi'omaga ae le'i faia ni fa'a'iuga e tusa ai ma le polokarame fuafuaina a le Matagaluega o le Ofisa o Aoga a Amerika Samoa. Fautuaga ua aloaia i le polokarame fuafua a le Matagaluega o le Ofisa o Aoga, mo Fuafuaga Fa'atatau o le Si'osi'omaga e onomea ona tu'uina atu i tusitusiga i le FEMA i le tuatusi o ta'ua atu: Region IX, EHP / Le'atele ES DEA, 1111 Broadway, Suite 1200, Oakland, CA 94607-4052 or [fema-rix-ehp-documents@fema.dhs.gov](mailto:fema-rix-ehp-documents@fema.dhs.gov). O ni fesili mo le Fuafuaga Fa'atatau o le Si'osi'omaga po o se avanoa, e mafai ona faia i le telefoni lea (510) 627-7027 (na'o fa'amatalaga lava). Mo lou fia auai i taualumaga i le faia o fa'a'iuga, o tima'iga mo Fuafuaga Fa'atatau o le Si'osi'omaga e matua'i mana'omia lava ona taulimaina i le vaeluaga o le po o Iuni 21, 2013.

**Distribution List**  
**Notice of Availability — Draft Environmental Assessment**  
**Le'Atele Elementary School Buildings Replacement**  
**FEMA-1859-DR-AS, PW 193**

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**From:** Fatima Sauafea-Leau - NOAA Federal <fatima.sauafea-leau@noaa.gov>  
**Sent:** Friday, June 21, 2013 5:33 PM  
**To:** FEMA-RIX-EHP-Documents  
**Cc:** \_NMFS PIR HCD EFH Consultation  
**Subject:** NMFS Comments - Le'Atele Elementary School Buildings Replacement, FEMA-1859-DR-AS, PW 193

Talofa FEMA Region IX, EHP/Le'atele ESDEA!

The Habitat Conservation Division of NOAA Fisheries Pacific Islands Regional Office (NMFS) has reviewed the Draft Environmental Assessment (DEA) for the Le'atele Elementary School project, FEMA-1859-DR-AS, PW 193, to restore the function of the school's administration building, childhood education (ECE) building, and kitchen/cafeteria building in Fagasa, Tutuila, American Samoa. NMFS appreciate the opportunity to provide the following comments pursuant to the Essential Fish Habitat (EFH) provision, §305(b) of the Magnuson Stevens Fishery Conservation and Management Act (MSA; 16 U.S.C. 1855(b)), the National Environmental Policy Act (42 U.S.C. 4321 et seq.), the Fish and Wildlife Coordination Act (16 U.S.C. § 662(a)), and the Clean Water Act (33 U.S.C. §1251 et seq.).

The Le'atele Elementary School's administrative building, ECE building, and kitchen/cafeteria building were destroyed during the earthquake, tsunami, and flooding in 2009. The three damaged buildings were located about 200 feet adjacent to the shoreline of Fagasa bay. The proposed project is to replace the disaster-damaged buildings with a singular two-story multiuse building to be constructed to current codes and standards. The proposed project would require excavation for installation of the foundation piers that will support the elevated structure. Other excavation suggested for connection of lines to the underground utilities. The proposed structure will be located southwest of and adjacent to the existing school's two-story classroom building. The duration for the project would be about 8 months.

Although, the new structure will be a little more than 200 feet across from the shoreline, it will be located within boundaries of flood zones and close to Agasii stream as well as shallow drainage ditches that drain surface waters into Fagasa Bay. Therefore, the proposed project has a potential to adversely affect the marine waters including EFH from sedimentation and turbidity caused by sediment run-off associated with construction activities.

The DEA has provided standard Best Management Practices (BMPs) that would follow ASEPA's American Samoa Erosion and Sediment Control Field Guide and the ASEPA Guidance Manual for Runoff Control, an erosion control plan, and will be in compliance with the EO 13089 of Coral Reef Protection. NMFS reiterates the importance of effective implementation, enforcement and monitoring of the proposed BMPs to ensure that there will be no discharge and run-off of sediment to the marine environment due to this project. If there will be discharge and impact to EFH, FEMA should consult with NMFS. The Magnuson-Stevens Fishery Conservation and Management Act mandates federal action agencies that fund, permit, or carry out activities that may adversely affect the Essential Fish Habitat (EFH) of federally managed fish species to consult with NOAA Fisheries regarding the potential adverse effects of their actions on EFH (Section 305 (b)(2)).

We provide the following additional comments on the DEA to help ensure avoidance and

minimization of adverse effect to our trust resources.

- In Section 4.4 on Biological Resources, include some biological information of the resources within the reefs or bay of Fagasa. Fagasa bay is one of the very few reefs in American Samoa that is popular for the traditional seasonal harvesting of the big eye scad (atule). This indicates that the habitat within the village bay has been a significant resource and home for these fish species and other marine life. In this section, also include and describe EFH to reiterate the importance for the proposed BMPs to be effectively implemented and monitored to minimize any adverse impacts to EFH.

- In Section 4.2.2 on Water Quality, include the Clean Water Act to comply with so it will enforce and strengthen the BMPs proposed in the project.

Thank you for the opportunity to provide comments. Please feel free to contact us should you have any questions.

Sincerely,  
Fatima Sauafea-Le'au

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## Appendix D: Cultural Resources Inventory Report

Cultural Resources Inventory Report Bound Separately (RESTRICTED DISTRIBUTION)

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CULTURAL RESOURCES INVENTORY REPORT

# LE'ATELE ELEMENTARY SCHOOL BUILDINGS REPLACEMENT

TERRITORIAL OFFICE OF FISCAL REFORM  
AMERICAN SAMOA DEPARTMENT OF EDUCATION

FEMA-1859-DR-AS, PW 193

APRIL 2013



THIS DOCUMENT WAS PREPARED FOR



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KEYWORDS: TUTUILA EAST USGS 7.5' QUADRANGLE, TUTUILA WEST USGS 7.5' QUADRANGLE, 0.55  
ACRE, INTENSIVE PEDESTRIAN ARCHAEOLOGICAL SURVEY, LE'ATELE ELEMENTARY SCHOOL

COVER PHOTO: PROJECT SITE ACROSS FAGASA BAY





