



# Rota Special Resource Study

## Frequently Asked Questions

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Prepared by:

National Park Service, Interior Regions 8, 9, 10, and 12  
Park Planning and Environmental Compliance Program

For details, updates, virtual meeting presentation slides, and to submit comments, visit:

<https://parkplanning.nps.gov/rotastudy>

To contact the study team, email: [Rota\\_Study@nps.gov](mailto:Rota_Study@nps.gov)

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These questions and answers address the Rota Special Resource Study preliminary findings and alternative concepts.

## **NPS Background**

1. What is the mission of the National Park Service (NPS)?

The National Park Service preserves unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations. The National Park Service cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world.

## **Special Resource Study Background**

2. Why is the National Park Service conducting this study?

This study was originally requested in 2004 by former Rota Senator Diego Songao. A bill directing the NPS to conduct the study was shepherded through the U.S. Congress by Representative Gregorio Kilili Camacho Sablan until it passed, as part of P.L. 113-291, in 2014. The legislation directs the National Park Service to study “the prehistoric, historic, and limestone forest sites on the island of Rota.”

3. What is a special resource study?

A Special Resource Study (SRS) evaluates the eligibility of an area to be designated as a national park or other special designation. The National Park Service collects information about the quality of resources in the study area. If the resources meet the eligibility criteria, the National Park Service will evaluate the potential for visitor enjoyment and efficient management and will analyze the feasibility and appropriateness of different management options. The National Park Service provides its findings to the Secretary of the Interior who then presents the study to Congress, along with a recommendation for the Secretary’s preferred management option for the area. The completion of the study itself will not result in any type of designation.

4. What are the goals of the study?

- Evaluate the national significance of the prehistoric, historic and limestone forest sites on the island of Rota (the study area).
- Determine the suitability and feasibility of designating the study area as a unit of the National Park System, including consideration of development and operational costs, and land management options.
- Consider the need for NPS management including other alternatives for preservation, protection, and the interpretation of the study area by federal, state, or local government entities, or private/nonprofit organizations.
- Consult with interested federal agencies, state or local government entities, private and nonprofit organizations, or any other interested member of the public.

## Public Outreach and Public Comment

### 5. What public outreach has been completed to date?

The NPS introduced the study in 2017 through a newsletter, project website, and meetings with organizations, agencies, elected officials, and the public. Six meetings were held on Rota, Saipan, and Guam, that were attended by over 200 people in February and March 2017, and 25 written comments were received. The comments received were analyzed and helped inform the content of Newsletter #2, which was posted in August 2020 on the project website, starting a second comment period that will end on November 20, 2020. In mid-September 2020, the NPS held virtual meetings with government and agency officials as well as two virtual public meetings attended by about 80 people total. In October 2020, an extensive frequently asked questions (FAQs) document was also posted on the project website.

### 6. Will you post videos or transcripts of public meetings?

Yes, the recordings of the two public meetings (held September 16th and 18th, 2020) have been posted to the Links section of the project website: <https://parkplanning.nps.gov/rotastudy>

### 7. Can people submit their comments on Facebook (or other platforms)?

No. The NPS is unable to monitor all the various online platforms and pages where people may share their thoughts and opinions. To ensure your comments are considered by the NPS team, they should be submitted by November 20, 2020 in one of the following ways:

- Online: <https://parkplanning.nps.gov/rotastudy>
- Email: [Rota\\_Study@nps.gov](mailto:Rota_Study@nps.gov)
- Mail:

National Park Service  
Planning and Environmental Compliance Branch  
Attention: Rota Special Resource Study  
333 Bush Street, Suite 500  
San Francisco, CA 94104

In addition, comment forms from Newsletter #2 may be returned to:

- Rota: Rota Mayor's Office
- Saipan: Saipan Mayor's Office or American Memorial Visitor Center

## Study Status and Next Steps

### 8. What is the status of the study?

Preliminary findings and alternative concepts are available for public review and comment through November 20, 2020. The final report is expected to be completed and transmitted to Congress in 2021.

9. What are the next steps in the study process?

The study team will analyze the public comments, conduct additional research to fill information gaps, refine the analysis of significance, suitability, feasibility and need for NPS management, revise the preliminary alternative concepts, and prepare the study report for transmittal to the U.S. Congress.

10. Will a draft Special Resource Study be distributed for public review?

No. The Special Resource Study process is different from other resource management planning processes. It is not a decision document, rather it provides information to the U.S. Congress to inform their possible action. After the report is transmitted to Congress it will be released to the public, and the National Park Service expects to announce its availability through news outlets, social media, and email. The report will be posted on the project website (<https://parkplanning.nps.gov/rotastudy>) and a limited number of printed copies will be made available.

### **Management Alternatives and Outcomes**

11. Does the NPS have a desired outcome for the study?

No. The role of the NPS is to objectively conduct the study as directed by Congress. The NPS cannot advocate for the creation of a new park unit and the NPS does not have a position or desired outcome. The NPS is using required study criteria to evaluate whether areas of Rota are significant, suitable, and feasible for addition to the national park system, in order to provide that information to the U.S. Congress.

12. What is the likelihood of a national park unit designation for Rota?

The NPS responsibility is to complete the study. It will be transmitted by the Secretary of the Interior with a recommendation to the U.S. Congress. It is up to the U.S. Congress to pursue designation of a park unit, generally at the request of the local member of Congress, and in consultation with those who control the land (in this case, the CNMI government). For context, over the last 20 years, approximately only one in three completed Congressionally authorized studies has resulted in a positive finding, whereby the study area meets all the criteria.

13. What types of national park designations might be possible on Rota?

There are numerous national park unit designations, such as national park, national monument, national preserve, national historical park, national historic site, or national seashore. Ultimately, the name and designation of a national park site is determined by Congress, in legislation. The National Park Service analysis indicates that the most likely designation for Rota's significant resource areas are either a national historical park, a national monument, or a national preserve, depending on the types of resources included and the desired management and uses. The designation of national park is typically restricted to large land areas, includes restrictions on activities such as hunting, and is not a likely option for Rota.



## **Management Alternatives – NPS Management**

### **14. How would a national park unit on Rota be established?**

A new unit of the national park system on Rota could only be established by an act of the U.S. Congress and in partnership with the CNMI government. Because the NPS cannot own land on Rota, appropriate land and resource management agreements (such as lease agreements, cooperative agreements, or other partnership arrangements) with the CNMI, Rota Municipal government, or other local organizations would be required.

### **15. How would NPS management be different from the current management of these areas?**

If a national park unit were established, the NPS would seek to work collaboratively with Rota and CNMI governmental managers and local communities to protect natural and cultural resources, provide for visitor enjoyment, and expand understanding of the area's special heritage and resources. Specific management decisions would be determined through management planning and funding of specific resource management, visitor-serving, and facility projects.

### **16. What resources would the NPS bring to help address resource management challenges, such as invasive species and climate change?**

If a national park unit were established, the NPS would work with local agencies and organizations and engage the specialists in the NPS to assist in developing appropriate measures and programs to preserve the natural and cultural resources of Rota. The NPS has specific fund sources dedicated to resource inventory, condition assessment, monitoring, and management activities.

### **17. What would the relationship of this park unit be to the Marianas Trench Marine National Monument?**

The Mariana Trench Marine National Monument is a large (95,000 square miles) area cooperatively managed by several federal agencies in cooperation with the CNMI government. If a national park unit were established on Rota, the NPS would likely look for opportunities to collaborate with the managers of the monument as well as with other resource conservation and management organizations.

### **18. What does “direct NPS management” mean?**

In the context of this study, “direct NPS management” refers to one of the required study criteria. It evaluates whether a lead management role for the NPS would be beneficial or whether the area would be best managed by another public agency, private conservation organization, or individual.

### **19. What kind of agreement would there be with the CNMI if an NPS unit were established?**

There are several different land management arrangements that could be considered if a national park unit were authorized on Rota, including one or more leases or cooperative management agreements. Specifics of an agreement with the CNMI would need to be negotiated, in line with any legislative direction provided as part of a park unit authorization, other federal laws and policies, and the authorities and interests of the CNMI government.

## Management Alternatives – Boundaries and Land Ownership

20. Are the proposed boundaries of the alternatives final?

No, the proposed boundaries are not final; these are preliminary alternatives. The NPS intent in drawing boundaries was to include public lands with the most significant resources, however, in some cases, the land ownership information we were provided may have been unclear. If a national park unit were designated on Rota, the boundaries would depend on legislation from the U.S. Congress. Land management responsibilities would depend on agreements with CNMI, and not all lands within a park boundary would necessarily be managed by the NPS.

## Management Alternatives – Other Options

21. What management options might be possible other than national park unit designation? For example, a national heritage area, a world heritage site, or U.S. government funding for local park management?

There are many types of recognition and management for areas with significant natural and cultural resources. Each option has benefits as well as possible limitations. The NPS will explore and document these options in the study report, including:

- *National Heritage Area designation:* National Heritage Areas (NHAs) are designated by Congress as places where natural, cultural, and historic sites combine to form a cohesive, nationally important landscape. They operate through locally based public-private partnerships, with a limited amount of matching federal funds, to support historic preservation, natural resource conservation, recreation, heritage tourism, and educational projects.
- *World Heritage Site designation:* World Heritage designation is a program of the United Nations to recognize sites of outstanding universal value for their natural or cultural resources. Nominations are made by the national government and the process can take many years. Designation does not come with funding, although some grant funds are available on a competitive basis for specific projects. Some national parks are also designated as World Heritage Sites, such as Hawaii Volcanoes National Park.
- *U.S. government funding for local parks:* The NPS offers limited grant funding for the acquisition and development of local parks through the Land and Water Conservation Fund. Other federal agencies have grant programs that may address some park and land management needs. However, it is challenging to find outside funding for ongoing land management or park operations.

## Management Alternatives – Economic impacts

22. What benefits might a national park unit bring to the people of Rota?

Based on research and analysis of the impacts of national park units throughout the U.S., potential benefits include:



- Likely increase in visitation to Rota and associated economic benefits from tourism.
- Greater international recognition for the Chamorro and Carolinian cultures.
- Visitor and education programs that serve both residents and outside visitors. For example, at many parks, the NPS forms partnerships with local schools providing opportunities for field trips and rangers conducting programs in the schools. The NPS has a long tradition of telling stories of the nation through our interpretation and education programs.

23. Would a national park unit result in more employment on Rota?

Over time the NPS would likely hire employees to work on Rota. Staffing numbers typically start with a small number of employees, which may increase as the unit becomes established. The exact number would depend upon many factors including Congressional funding, the size and type of unit, and management arrangements with the CNMI. Employment associated with a park unit on Rota would also be affected by jobs created by other organizations, such as park partners and tourism-related businesses.

24. Would the NPS hire locally to support a park unit on Rota?

The NPS is required to follow federal hiring procedures and policies. However, some parks have specific legislative direction to support local hiring. At American Memorial Park on Saipan, for example, legislation directs the NPS to the maximum extent feasible to employ and train residents of the Mariana Islands to develop, maintain and administer the park. All the staff currently stationed there were hired locally; however, the National Park Service is required to follow federal hiring guidelines.

25. How much would it cost to operate a national park unit on Rota?

There are many considerations for a park budget including annual operating costs, maintenance, interpretation and education programs, and possible construction projects. The special resource study report will include cost estimates for each management alternative. As an example, American Memorial Park on Saipan had four employees and an annual appropriation of \$267,000 in FY2000. In FY2020, the park has 10 employees and was allocated approximately \$1,600,000. From FY2000 to FY 2020, additional funds were allocated as new buildings and programs were added.

### **Management Alternatives – Land uses and Activities**

26. Would subsistence hunting and gathering be allowed in a new national park unit on Rota?

The allowed uses would depend upon the type of unit established and the legislation that creates the unit. National Preserves may allow hunting if authorized in Congressional legislation, typically as allowed by state wildlife management laws and policies. Gathering of plants and other materials is allowed in many park units, for example at American Memorial Park and at War in the Pacific National Historical park, many types of fruits, nuts, berries or unoccupied seashells may be gathered for personal use or consumption but not for commercial use.

27. Would the NPS build a visitor center or cultural center on Rota?

If a national park unit were designated, future facilities would be evaluated through a management planning process. Where possible, use of existing buildings or shared facilities is preferred over new construction.

### **Special Resource Study Findings – Resource Significance**

28. What resources are found to be nationally significant?

[Newsletter #2](#) provides a full description of the national significant cultural and natural resources on Rota, including Chamorro archeological sites, World War II defensive sites, and limestone forest areas.

29. Which of Rota’s historic sites did you evaluate?

We evaluated 35 of the most documented and well-known historic and prehistoric sites on Rota using National Historic Landmark criteria. Some of the sites are nationally significant individually or as part of a broader pre-contact cultural landscape and some sites do not meet the National Historic Landmark criteria or need further study to evaluate their significance.

30. How did you select which areas of the limestone forest to include in the alternative concepts?

We evaluated the limestone forest areas using National Natural Landmark criteria, as described in [Newsletter #2](#), including illustrative character, present condition, diversity, rarity, and value for science and education.

31. Why weren’t other natural area evaluated by the study (for example, coral reef areas)?

The legislation authorizing the study directed the NPS to study the “prehistoric, historic, and limestone forest sites on the island of Rota.” Because the coastal areas, ocean waters and nearby submerged shipwrecks were not included in the authorizing legislation for the study, the NPS was not able to evaluate them.

### **Special Resource Study Findings – Feasibility**

32. What is meant by “conditional feasibility”?

A Special Resource Study may reach a “conditional feasibility” finding to show that more information is needed or that certain conditions would have to be met for NPS management to be feasible. For example, some new areas may be feasible additions to the national park system only if landowners are willing to sell or donate property or if a formal management agreement with another public agency can be negotiated.

Conditional feasibility was found because the NPS cannot own land on Rota. Preliminary analysis indicates that Rota’s limestone forests, Chamorro archeological sites, and Japanese World War II defensive complexes are conditionally feasible as an addition to the national park system, dependent on establishment of appropriate land and resource management agreements with the CNMI and Rota governments, support from the CNMI government, and further analysis of the costs.