



# URÁÁLI REFALUWASCH ASSOCIATION

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August 24, 2023

To: **Attn: Green Turtle Critical Habitat Proposed Rule**  
Endangered Species Division, Office of Protected Resources  
National Marine Fisheries Services, 1315 East-West Highway (SSMC3),  
Silver Spring, Maryland 20910

Subject: **NOAA-NMFS-2023-0087 and FWS-R4-ES-2022-0164**

Hafa Adai and Tirow!

This is to inform you that we, the undersigned, Northern Marianas Descent members of the **Uraáli Traditional Carolinian Dance Group (Registered Non-Profit Organization as URAALI REFALUWASCH ASSOCIATION under Business License No. 27006/NAICS-71112)**, hereby request for a **postponement** on the public comments for the Federal mentioned above Docket. The underlying reasons are provided below:

1. To begin, a long history regarding ownership and management of submerged lands around the Northern Mariana Islands can be found in the Covenant agreement between the Northern Marianas Island and the United States of America and this great Commonwealth Constitution.
2. In addition, the NOAA Fisheries and USFWS need to conduct adequate assessments to ensure a critical habitat designation will protect what NOAA Fisheries and USFWS claim to protect and show its effects on the economy. We know this will significantly hinder tourism, future commercial fishing ventures, potential mining activities, and the local Marianas indigenous peoples' free passage in the identified areas per the proposed regulations. The NOAA Fisheries and the USFWS need to be held accountable for the expected and potential financial loss resulting from the designations. This organization is also concerned with the lack of public involvement, and the statistic shared is data from fifteen years ago that prompted these two agencies (NOAA Fisheries and USFWS) to implement the proposed ADMINISTRATIVE LAW.
3. Moreover, as we often see with the two agencies (NOAA Fisheries and USFWS), to avoid consultation via Section 902 of the US Public Law 94-241 is a complete abuse of power. The two federal agencies (NOAA Fisheries and USFWS) did not consider the CNMI people's submerged land rights (Littoral Zone inclusive of the Sublittoral Zone and the Supralittoral Zone). The areas identified within the proposed rule will have potential negative impacts in the future on the expansion of Saipan harbor, economic opportunities for the Northern Islands, and the traditional passage rights on the beaches and ocean on Saipan, Tinian, Rota, and the Northern Islands (Pagan and Agrihan). Furthermore, if this proposed

## OUR CULTURE FOREMOST

Docket Number **NOAA-NMFS-2023-0087 and FWS-R4-ES-2022-0164**

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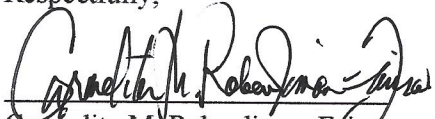
Administrative law is enacted, and the two federal agencies will make the administrative decision without the involvement of the CNMI government.

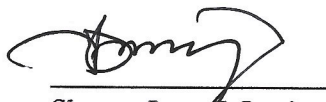
4. The responsible federal government agencies (NOAA Fisheries and USFWS) needed to adequately provide information on monetary compensation to the government of the CNMI for land takings in the areas where this proposed measure is to be effectuated; other incentives needed to be presented. Option where it will involve co-management between the CNMI Government and the federal agencies the regions identified. Furthermore, the two federal agencies should have disclosed if the federal funding guaranteed by the Covenant agreement would be affected. Other current financial assistance that CNMI is a recipient of.
5. This organization upholds the protection and conservation plan for endangered species. As noted, the Commonwealth enacted numerous statutes for the designation of Marine Protected Areas and islands designated in our CNMI Constitution as wildlife sanctuaries.


We, the undersigned below, firmly assert that the following be granted.

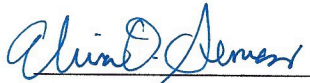
The proposal be placed on hold for further consultation process between CNMI and the two federal agencies under Section 902 (US Public Law 94-241).

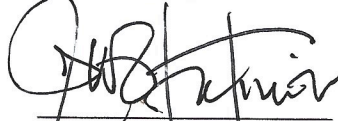
Respectfully,


  
Carmelita M. Rabauliman Faisao  
President

  
Sharma Lynn I. Laniyo  
Vice President

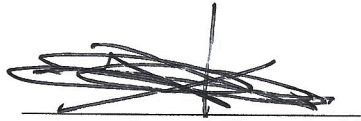
  
Lorna Ilapeta O. Iginooef  
Secretary

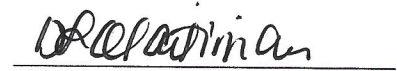
  
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Board Member

  
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Board Member

  
Melvin L.O. Faisao  
Board Member

  
Begonia Marie O. Camacho  
Board Member

cc: Honorable Arnold I. Palacios, Governor, CNMI  
Honorable Edmund S. Villagomez, Speaker, 23<sup>rd</sup> NMCL  
Honorable Valentin N. Taisacan, Mayor, Northern Islands  
Mr. Felix Nogis, Executive Assistant, CAO  
Mr. Ross Manglona, Resident Executive, IAO



Northern Marianas Descent (Carolinian/Refaluwasch) Traditional Uraali Dance Group members:

(Print)

(Sign)

1. Jeff L Ruben
2. Felicidad O. Iginoef
3. Lorenza O. Iginoef-Ruben
4. Jennifer Ton O. Iginoef Ruben
5. Jack Jr. L. Ruben
6. Joseph O. Iginoef
7. John O. Fitial
8. Dorina O. Iginoef
9. Lanalei S. Santos
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18. Anastacia Santos
19. Jean O. Rabaulma
20. Tony S. Kapileo
21. Tony Jake P. Seman
22. Concepcion O. Seman
23. Jaydalyn Usua
24. Ida A. Kapileo

1. JL
2. F Iginoef
3. LMD Iginoef Ruben
4. Jennifer Ton
5. Jack Jr.
6. Joseph
7. J Fitial
8. Dorina
9. Santos
10. Taisacan
11. Carmen L Olaitiman
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