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Administrator

Commonwealth of the Northern Mariana Islands  
**OFFICE OF THE GOVERNOR**  
**Bureau of Environmental and Coastal Quality**  
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Richard V. Salas  
Director, DCRM

March 15, 2022

Ref No: PLN22-015

Kevin Nishimura  
Environmental Protection Specialist  
Honolulu Airports District Office, Western-Pacific Region  
Federal Aviation Administration, US DOT  
300 Ala Moana Blvd, Rm. 7-128  
Airports District Office, Honolulu, HI 96813  
MAIL: PO Box 50244, Honolulu, HI 96850

**RE: Objection to Negative Determination for the Proposed Saipan International Airport, Airport Rescue and Fire Fighting (ARFF) Facility, Rapid Refill Project**

Dear Mr. Nishimura,

The Commonwealth of the Northern Mariana Islands (CNMI) Division of Coastal Resources Management (DCRM) has reviewed the Coastal Zone Management Act (CZMA) negative determination (ND) from the Federal Aviation Administration (FAA) received on January 26, 2022, for utilization of FAA federal grant funds under the Airport Improvement Program (AIP) to finance the proposed Francisco C. Ada/Saipan International Airport (GSN), Airport Rescue and Fire Fighting (ARFF) Facility, Rapid Refill Project.

Pursuant to 15 CFR § 930.35(c), DCRM objects to the ND on the grounds that coastal effects are reasonably foreseeable. "Coastal effects" are defined in 15 CFR § 930.11 to include any reasonably foreseeable effect on "any coastal use or resource."

In DCRM's review of the proposed ARFF Facility ND, FAA states that the proposed project "may affect, but is not likely to adversely affect" the Mariana common moorhen (*Gallinula choropus guami*). The FAA attached the USFWS ESA Section 7 consultation with the ND, which indicates conservation measures, developed in coordination with the Service, that will avoid or minimize effects to the moorhen. At this time, DCRM requests that the FAA submit a consistency determination identifying coastal effects under 15 CFR § 930.33 so DCRM can evaluate whether the proposed action is consistent with the CNMI's enforceable policies.

Thank you for coordinating with the CNMI CZMP. If you have any questions or need additional information, please contact Arthur Charfauros at (670) 664 8314 or [fedcon@dcrm.gov.mp](mailto:fedcon@dcrm.gov.mp).

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Salas', with a long horizontal flourish extending to the right.

RICHARD V. SALAS

Director

Division of Coastal Resources Management