

**Public Comment**  
**By John Calvo, Guam On-Site Coordinator**  
**Western Pacific Regional Fishery Management Council**  
**Presented to the U.S. Coral Reef Task Force**  
**February 24, 2010**  
**Washington, DC**

**Dear US Coral Reef Task Force members:**

The following comments and recommendations are being presented on behalf of the Western Pacific Regional Fishery Management Council.

**Dredging of Apra Harbor and the Proposed Offshore Disposal Site**

During the week ending on May 22, 2009, the Guam Fishermen's Cooperative Association hosted a meeting for its members to participate as a stakeholder in the Draft Environmental Impact Statement (DEIS) process for the "Ocean Dredged Material Disposal Site for Guam." Within the military buildup plans presented, Apra Harbor will be dredged to accommodate aircraft carriers. The dredging will have long-lasting impacts on nearby turtle nesting areas, the island's largest mangrove area and other natural and cultural resources. The dredging will destroy some of the most pristine coral reef structures found in Guam's waters.

Moreover, the military plans to dump the dredged material 12 miles offshore in local fishing waters. Two desired sites were reviewed. The presenters noted that the dumped dredge material will be disbursed about throughout most of the year, but it is unclear how the region's often times turbulent seas will impact this disbursement. The effects on the pelagic, bottomfish and coral reef ecosystems have not been assessed.

Several fishermen at the meeting said they fish in these areas and the use of these sites as a disposal area will impact their fishing activities. Additionally, they expressed grave concern that, despite discussion about compacting the possibly contaminated matter (to allow quicker sinking), the currents will redistribute the matter onto seamounts and near shore fishing areas, which have already been heavily impacted by land use issues. The fishermen noted that the Navy already has three sites holding dumped contaminated soil and recommended that the military undertake the following:

- \* Consider treating or dumping the dredged material elsewhere like the contaminated soil being removed from the Urunao site by the Air Force, and

- \* Utilize the material for on-island construction projects instead of importing material from other sources.

Despite these comments by the fishermen orally and in submitted comments, some of the presenters at the subsequent January 9 and 12, 2010, military buildup DEIS meetings held on Guam said that the offshore disposal site would move forward because no one was fishing there. Their statement was particularly disturbing because these presenters had also participated in the May 2009 meetings at the Guam Fishermen's Cooperative Association where the fishermen reported that they fish in the areas being proposed as dump sites.

Another concern that the Council has about the proposed dredging project is the military contractors' use of a beam trawl to collect bottom samples for their study to identify the dumping area. According to page 5 of the March 2008 /NOAA Report to Congress: Implementation of Deep

Sea Coral Research and Technology Program/, "Deep sea coral assemblages are vulnerable to damage from bottom-tending fishing gears, especially bottom-trawling." The report also notes that "in 1983, the Council recommended, and NMFS implemented a prohibition on the use of trawl gear, which was identified as a threat to deep sea corals---within all waters in their region of the U.S. EEZ" (page 19).

These issues were reported to the Council when it convened July 22--25, 2009, in Kona, Hawaii. The Council members were surprised to hear about the use of the beam trawl considering that it had pushed for banning the use of such gear in 1983. NOAA NMFS was requested to look into the matter to ensure that proper permits were processed and if not to take proper regulatory action. To date, the Council as yet to receive a response to the issues discussed.

### **Marianas Islands Range Complex**

The fishermen of the island of Guam and the Commonwealth of the Northern Marianas Islands (CNMI) will be impacted when fishing area closures are implemented within the Marianas Islands Range Complex to allow for military maneuvers and exercises. Included in these areas are offshore banks that provide pristine nurseries for a myriad of fish species that regularly replenish the islands. The impact that these exercises may have on the offshore fishery and coral reef resources has not been determined. Moreover, compensatory mitigation for impacts to coral reef resources may not sufficiently address the loss of natural resources, habitat and public access to natural and cultural resources. The impacts to the coral reef ecosystem will need to be assessed, and the loss of fishing areas to the livelihood to local fishermen, who are primarily subsistence artisanal fishermen, must be addressed. This is a food security issue.

### **Military Buildup**

According to information that has been provided to the people of Guam over the last year, the number of people moving to Guam associated with the military buildup has been a moving target. The initial figures included 8,000 Marines, plus 9,000 dependents, as well as 23,000 contractors and support personnel. The most recent figure is 80,000, including many foreign contract workers who come from countries with fishing cultures. The Council is concerned that such an influx will not only strain the local infrastructure, but also significantly impact already limited local fishery resources and the local islanders who rely on fish for sustenance. This is a food security issue that needs to be addressed.

### **Recommended Actions:**

1) Military Fishing Permit and Reporting: In light of the military buildup, the lack of access to the Sumay Marina (which is the primary departure area for military fishermen on Guam) and the need to acquire sufficient data for fishery assessments, the Council will be considering a fishing permit and reporting process for the military bases.

2) Fishery Participation in the Coral Reef Task Force: The Council continues to request that it be recognized as a member of the U.S. Coral Reef Task Force.\* \*The Council is mandated by the Magnuson-Stevens Fishery Conservation and Management Act to manage the fisheries in the large area of offshore banks that have some of the largest coral reef ecosystems within the U.S. exclusive economic zone. The need for fisheries to be an active participant in the Task Force was recognized during the Steering Committee's vibrant discussion yesterday. The Coral Reef Conservation Program's current strategic plan identifies fisheries as one of its three focus areas.

**Thank you for this opportunity to provide comments.**