



**Public Comment**  
**by Manuel P. Duenas, Chairman**  
**Western Pacific Regional Fishery Management Council**  
**Presented to the U.S. Coral Reef Task Force**  
**February 24, 2011**  
**Washington, DC**

Dear US Coral Reef Task Force members:

The communities of the Mariana Archipelago (i.e., the Territory of the Guam and the Commonwealth of the Northern Mariana Islands (CNMI)) have depended on coral reef fisheries for their subsistence for four millennia. Many of these communities continue to do so today. However, not only are their livelihoods but their very lives are increasingly threatened by actions that close traditional fishing grounds. We urge you to support adequate assessment, mitigation, compensation and regulations for these activities (listed below), including fully addressing socioeconomic consideration in the creation of marine preserve areas, also known as marine protected areas (MPAs), and in the undertaking of military activities.

The Council also reiterates its recommendation that Regional Fishery Management Councils with jurisdiction over coral reef ecosystems be provided a single seat on the U.S. Coral Reef Task Force and be allowed to participate, at least as an observer, at steering committee and local action strategy meetings. The Fishery Management Councils are mandated by the Magnuson-Stevens Fishery Conservation and Management Act to manage the fisheries in large areas of offshore banks that have some of the largest coral reef ecosystems within the U.S. exclusive economic zone. The Coral Reef Conservation Program's current strategic plan identifies fisheries as one of its three focus areas. It is important that fisheries be represented accordingly.

- **MPA Enforcement Impact on Fishermen's Risk to Drowning**

On December 31, 2010, the National Institute for Occupational Safety and Health (NIOSH), Centers for Disease Control (CDC), released the report "The Impact of Marine Preserve Areas on the Safety of Fishermen on Guam." The major finding of the study was that the risk of drowning more than doubled for Chamorro fishermen after marine preserve areas were enforced in 2001. (See attached report.) The US Coral Reef Task Force should support an appropriate protocol for developing MPAs that takes into consideration the safety and socioeconomic impacts to fishermen.

For example, Regional Fishery Management Councils must adhere to the 10 National Standards, listed in Section 301 of the Magnuson-Stevens Fishery Conservation and

Management Act. National Standard 8 stipulates that “Conservation and management measures shall ... take into account the importance of fishery resources to fishing communities by utilizing economic and social data that meet the requirements of paragraph (2), in order to (A) provide for the sustained participation of such communities, and (B) to the extent applicable, minimize adverse economic impacts on such communities.” National Standard 10 states “Conservation and management measures shall, to the extent practicable, promote the safety of human life at sea.”

Moreover, U.S. Sen. Scott Brown’s current legislative proposal (S. 238) targets changes in the Magnuson-Stevens Act would subject federal fisheries policy actions to systematic, independent economic analysis on an annual basis. As reported in the news, it was the National Marine Fisheries Service’s failure to balance community well-being and industry harvest with conservation efforts that makes it necessary for independent evaluation of the impacts of regulatory actions.

- **Marianas Islands Range Complex**

The Marianas Islands Range Complex is closing fishing areas to allow for military maneuvers and exercises (see attached “Guam, CNMI Military Buildup ...,” winter 2010 issue, *Pacific Islands Fishery News*). These areas include offshore banks that provide nurseries for a myriad of fish species that regularly replenish the islands. The impacts to coral reef resources and the loss of natural resources, habitat, fishing areas and public access to natural and cultural resources should be fully accessed. The livelihood to local fishermen, who are primarily subsistence artisanal fishermen, must be addressed. This is a food security issue. Mitigation and/or compensation (such as, as development of alternative fishing access infrastructure, additional fish aggregation devices, etc.) should be fully explored.

- **Military Buildup on Guam**

According to information provided to the people of Guam, the anticipated increase to the island’s population as a result of the scheduled military buildup has increased from the initial figures of 8,000 Marines, plus 9,000 dependents, and 23,000 contractors and support personnel, to as much as 80,000. The anticipated new residents will include many foreign contract workers from countries with fishing cultures. 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 also needs to be addressed. Mitigation and/or compensation (such as, as development of alternative fishing access infrastructure, additional fish aggregation devices, etc.) should be fully explored.

Thank you for this opportunity to provide comments.

Attachments: The Impact of Marine Preserve Areas on the Safety of Fishermen on Guam  
S. 238

“Guam, CNMI Military Buildup,” winter 2010, *Pacific Islands Fishery News*