

MARINE MAMMAL COMMISSION
4340 EAST-WEST HIGHWAY, ROOM 905
BETHESDA, MD 20814

31 January 2001

Mr. Franklin D. Kramer
Acting Undersecretary for Policy
Room 4E838
2400 Defense Pentagon
Washington, D.C. 20301-2400

The Honorable Mary Beth West
Deputy Assistant Secretary for Oceans,
Fisheries, and Space
Department of State, OES/OA
2201 C Street, N.W., Room 7831
Washington, D.C. 20520

Dear Mr. Kramer and Ms. West:

Several marine scientists and a number of national and international conservation organizations have contacted the Marine Mammal Commission expressing concern about the possible environmental consequences of relocating the Marine Corps' Futenma Air Base to a site on the east coast of Okinawa. The Commission shares these concerns, particularly as they relate to the small, and presumably genetically isolated, population of dugongs (*Dugong dugon*) that inhabits the Ryukyu Archipelago. Dugongs are listed as endangered under the Endangered Species Act and the Okinawan population is considered to be "critically endangered" by the Mammalogical Society of Japan. Although long-lived, dugongs are slow to mature and have a low reproductive potential, with a calving interval of between three and seven years. As such, the species is remarkably susceptible to extirpation and, in fact, many populations have already disappeared as a result of human activities.

Forage for dugongs is provided by sea grasses, which are restricted to about 10 percent of the coastline of Okinawa, primarily within the central part of the eastern side of the island. Locating the air base in this sensitive area can be expected to hasten habitat degradation already occurring as a result of soil erosion and other activities. The potential for habitat loss, along with incidental mortality in fisheries, has prompted a team of internationally recognized dugong experts to call for the establishment of a dugong sanctuary along the east coast of Okinawa to include the coastal reef flats where dugongs feed and extend seaward to beyond the reef crest where dugongs rest during the day.

The possible adverse impacts to dugongs from the proposed relocation of the base prompted the participants at the Second World Conservation Congress, held in Amman, Jordan, in October 2000, to adopt a recommendation urging Japan, in cooperation with the United States, to undertake an environmental impact assessment of the construction of military facilities in and around dugong habitat.

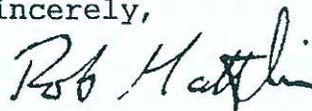
In response to that recommendation, representatives of the United States issued the enclosed statement for the record supporting the preparation of a "comprehensive and transparent" environmental impact assessment and expressing a willingness to cooperate with Japan in preparing such an analysis. The Marine Mammal Commission strongly supports the commitment made by the United States and is willing to assist in any way it can to ensure that an assessment is prepared that fully considers the potential impacts to dugongs and the habitat on which they depend. In this regard, we would appreciate being advised as to whether Japanese officials have committed to preparing an assessment of the potential environmental impacts of the proposed base relocation. If not, we recommend that the Department of Defense, in collaboration with the State Department, initiate discussions with appropriate officials in Japan to encourage the preparation of such a document. If Japan has made such a commitment, we would like to be advised as to what role the United States plans to take in conducting the review, what U.S. agencies are likely to be involved, and which agency is expected to take the lead for the United States. We also would be interested in learning the expected time frame for preparing an assessment, what opportunities will be provided for interagency or public review, and what criteria would be used and process followed for determining whether the plans for the new base should be modified if the assessment indicates a significant potential for adverse effects to dugongs or other components of the environment.

Although the Department of Defense prescribed the operational requirements and concept of operations that will be used to choose the site for the new base and apparently has or intends to develop evaluation criteria, it is our understanding that the Marine Corps has taken the position that replacement of the Futenma facility is an action being taken solely by the Government of Japan within the sovereign boundaries of Japan. According to the Marine Corps, the United States is not involved in site selection or planning, designing, or constructing the new base and therefore there is no U.S. federal action that would trigger the requirements of the National Environmental Policy Act or Executive Order 12114, or the Endangered Species Act consultation requirements. While this may be the case, it would

appear that operations at the base would constitute a federal action that, unless the Okinawan dugong population were extirpated by base construction, would trigger the application of U.S. environmental laws. It seems that base operation, at a minimum, would require the preparation of an environmental assessment under the Executive Order. This being the case, the Commission believes that it makes sense for the Department of Defense to coordinate its review with any such review being conducted by Japanese authorities so that the possible effects, not only of base construction, but of eventual operations, can be anticipated and evaluated in a single document. Toward this end, the Commission recommends that the State Department use its good offices to facilitate the establishment of a comprehensive, cooperative approach that would look at long term issues such as the effects of noise, increased vessel traffic, turbidity, and run-off from a new facility, as well as the more immediate issues of site selection and construction.

We look forward to working with the Departments of Defense and State and the other involved agencies to promote a cooperative approach under which the potential environmental effects of relocating the Futenma Air Base can be fully considered and, to the extent practicable, minimized.

Sincerely,



Robert H. Mattlin, Ph.D.
Executive Director

enclosure

cc: The Honorable Jamie Rappaport Clark
The Honorable George T. Frampton, Jr.
Lieutenant General G. S. McKissock

US Statement for the Record on CNV004 and CNV005

Conservation of the Dugong, Okinawa Rail, And Okinawa Woodpecker

WWC 2 – October 10, 2000

- **Considering the intent of consolidated motions CNV004 and CNV005, concerning the conservation of the Dugong, the Okinawa Rail, and the Okinawa Woodpecker, the United States supports efforts to conserve these and other endangered and threatened species. We respect and share the concern the sponsors of these motions have shown for these species' continued survival. We had some questions about what was being requested in the earlier versions of this motion, but we feel that the current version is much clearer.**
- **In that context, we can say that we support a comprehensive and transparent environmental impact assessment on the proposed Futenma relocation options. We are prepared to cooperate on an environmental impact assessment for these areas conducted by the Government of Japan, as requested by the Government of Japan.**
- **The United States has committed publicly to making all efforts to protect the environment in Japan, consistent with relevant laws and regulations. In the course of these efforts, we welcome dialogue with concerned nongovernmental organizations.**