

August 19, 2014

Statement Concerning the U.S. Military's Response to NACS-J's Request to Enter Restricted Water Areas in Henoko for Scientific Survey on Dugong Feeding Trails

The Nature Conservation Society of Japan Chairman of the Board of the Directors Dr. Akira Kameyama

The Nature Conservation Society of Japan (NACS-J) requested that the U.S. Forces in Japan (USFJ) allow a team of experts to enter the "temporarily restricted water areas" in Henoko and Oura Bay to conduct a survey on dugong feeding trails. The temporarily restricted water areas were established in early July, 2014 by both Japanese and US governments in order to proceed with the construction of the Futenma Replacement Facility (FRF). The NACS-J received an official letter (the Letter) dated August 15, 2014 from Colonel C. B. Snyder, Deputy Commander, Marine Corps Installation Pacific, and this letter denied the NACS-J's request.

From May through to mid-July 2014, the NACS-J and Team Zan of the Association to Protect the Northernmost Dugong conducted surveys on dugong feeding trails. We found dugong feeding trails in the temporarily restricted water areas. These feeding trails indicate that the Dugong, designated as a "critically endangered (IA)" species by the Japanese Ministry of the Environment, frequently used the temporarily restricted water areas.

During the Okinawa Defense Bureau's Environmental Impact Assessment (EIA) process, no dugong feeding trails were found in the temporarily restricted water areas. The NGOs' finding of these dugong feeding trails thus challenges and overturns the predictions made by the Bureau's EIA, particularly regarding impacts of the FRF on the Okinawa dugong.

In light of the finding of dugong feeding trails, in an area where the Bureau's EIA did not predict the presence of dugong feeding trails, the NACS-J made its request to enter the temporarily restricted water areas. The purpose of this request was to allow a team of dugong experts, invited from abroad, to conduct scientific research on dugong feeding trails and dugong habitats.

The Letter from Colonel C.B. Snyder stated that the temporarily restricted water areas constitute "an active Japan construction site" and indicated that "the current construction activity" takes place. However, the current activity undertaken by the Okinawa Defense Bureau is in the form of drilling surveys. This is a requirement, by Japanese law, prior to undertaking actual construction. Therefore, we believe it is illogical for the USFJ to deny a team of dugong experts to conduct scientific research while/because the Bureau is conducting its pre-construction surveys.

The Letter also stated that "Japan studied the potential impacts of the current



construction activity under Japanese Environmental Impact Assessment law." However, as pointed out by the NACS-J, other environmental NGOs, scientists, and EIA experts on many occasions, numerous flaws have been found regarding the scientific aspects of the Bureau's EIA process and of the Okinawa prefectural government's Land Reclamation Permit Approval process. A recent report "The U.S. Military Presence in Okinawa and the Futenma Base Controversy" released by the U.S. Congress Research Service also refers to such environmental concerns.

The Letter further stated that "the ODB (Okinawa Defense Bureau) informed us" that "the proposed survey areas are located in ODB work areas on the water where construction and military watercraft are operating and entrants' safety can not be ensured." If the current situation of the area is not safe enough for a scientific survey to be conducted, one has to conclude that the mitigation and conservation measures proposed in the EIA for the endangered Dugong are not appropriate at all.

The area of Henoko and Oura Bay is a rich natural environment and the International Union for Conservation of Nature (IUCN) has adopted recommendations three times, calling for the conservation of the dugong inhabiting the area. The population of the Dugong in Okinawa is especially valuable since it is the northern most population of the Dugong species in the world.

The undertaking of the FRF plan is contingent upon the appropriateness and validity of the predictions made in the Okinawa Defense Bureau's EIA. When the predictions of the EIA greatly differ from the current and actual situations, it is imperative that further scientific research be conducted. The NACS-J strongly urges that the USFJ allow researchers to enter the temporarily restricted areas for surveys. The NACS-J also strongly urges that the USFJ take appropriate action, according to the conservation standards set forth in the U.S., to ensure the survival of the dugong whose population is on the decline on the global scale.

Reference: Government begins seabed survey for Futenma base transfer http://www.japantimes.co.jp/news/2014/08/17/national/government-begins-seabed-survey-futenma-base-transfe/#.U_H2j1LlrIV