



## Office of the Governor of Guam

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James L. Connaughton  
Chairman  
Council of Environmental Quality  
The White House  
1600 Pennsylvania Avenue NW  
Washington, DC 20500

Dear Mr. Connaughton:

*Hafa Adai!* Marine resources within the Marianas Trench are extremely valuable and the Government of Guam has several concerns regarding the designation of a marine conservation management area in this region. We are not in support of a sudden declaration of a monument or conservation status within the Marianas Trench by Executive Order of the President because such a process would not allow for an appropriate consideration of cultural, environmental, economic and multiple use implications which require a considerable amount of time. The creation of such a monument entails detailed planning and should include, at minimum, an assessment of resource values and potential uses, an assessment of impacts to the local communities, meaningful stakeholder input, a comprehensive cost-benefit analysis, and long term management and monitoring strategy. None of these analyses have been conducted.

While the mission of the Department of Defense is crucial for national security and the Marianas Trench has high strategic military value, the designation of a monument without a complete assessment of Department of Defense operations and procedures would compromise the ultimate intent and purpose of a monument--the protection and conservation of marine resources. Furthermore, if a monument should be established, it is crucial that the interests of the Government of Guam and Commonwealth of the Northern Mariana Islands be incorporated into preliminary designs and studies. For example, the southern islands of the Marianas Trench have higher biodiversity and greater habitat diversity as compared to the northern islands. It is imperative that facts such as these are considered in a site selection process. In addition to involvement of the local governments, meaningful stakeholder input from the general public is crucial especially with regard to marine conservation actions. Also, the Government of Guam was assured by National Oceanic and Atmospheric Administration representatives during their recent visit that the current management of potentially affected fisheries would not be modified. Finally, joint responsibility for management of the proposed area of conservation should be shared by the local jurisdiction and the federal government.

