The posting of this PA Memo on the Cultural Resources Information (CRI) website is required by Stipulation IV.E.2. of the 2011 Military Relocation PA as a means for interested members of the public to provide comments on the identification and evaluation of historic properties. Confidentiality requirements under the Archaeological Resources Protection Act (ARPA) and National Historic Preservation Act (NHPA) prohibit federal agencies from publicly disclosing the exact nature and location of archaeological sites and other types of historic properties such as traditional cultural properties (TCPs).
PROJECT DESCRIPTION

There are primary and supporting tasks associated with this project:

Primary Tasks
The project proposes to construct twelve earth covered magazines of reinforced concrete capable of storing a specified quantity of munitions, two partially covered ordnance pad with lightning protection, grounding system, and electrical service to function as an ammunition work and overhaul shop. The two ordnance pads will be concrete slabs-on-grade, partially covered with a roof overhang constructed of reinforced concrete roof slabs supported by reinforced concrete beams, columns and foundations.

Supporting Tasks
Project preparation would include vegetation clearing and grubbing, topographic and geotechnical work, temporary sediment and erosion controls, earthwork for earth berm construction, and sediment removal. In addition, the project would also require paving, road resurfacing, construction of concrete aprons, installation of security fencing and gates, landscaping and demolition. Infrastructure for electrical utilities includes primary and secondary distribution systems, transformers, and communication ductbanks. Mechanical utilities include foundation wall drains, shallow depressions and swales for storm water. The project work will also require soil testing, remediation, and mitigation for Unexploded Ordnance (UXO)/Munitions and Explosives of Concern (MEC).

IDENTIFICATION OF HISTORIC PROPERTIES

Scope of DoD Identification Efforts

In planning for the Undertaking, the Department of Defense (DoD) first conducted a data gap analysis to determine the need for supplemental identification and evaluation surveys and then conducted those surveys. In consultation with the Guam SHPO, Advisory Council on Historic Preservation (ACHP), National Park Service (NPS) and Concurring Parties to the 2011 Programmatic Agreement (2011 PA), the DoD has applied the results of those identification efforts to the siting/lay down of individual projects to avoid and minimize effects to historic properties to the extent practical. DoD has provided documentation of these efforts to the Signatories and Invited Signatories via Appendices D and E of the 2011 PA.

DoD surveys and evaluations have focused on project-specific APEs, defined consistent with 36 CFR §800.16(d) to include those portions of the island of Guam subject to direct and indirect effects of projects included in the Undertaking.

More specifically, the P-290 APE has been subject to one or more of the historic property identification efforts listed in 36 CFR §800.4(b)(1), which may include background research, consultation, oral history interviews, sample field investigation and field survey. As such, results...
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Results of the above identification efforts indicate that there are several historic properties in the vicinity of the APE. In PA Memo #1, the DoD determined two historic properties were located within the P-290 APE:

**Site T-9-1** (temporary number) is a Latte Period artifact scatter containing ceramics and lithics. The site measures approximately 20 meters (m) (65.6 feet (ft)) long by 15 m (49.2 ft) wide with an irregular shape, oriented roughly northwest/southeast. Although the site is listed in poor condition, it is eligible for listing in the National Register of Historic Places under criterion D.

**Site T-9-2** (temporary number) is an artifact scatter with both Latte Period and Second American Administration Territorial components. The site measures approximately 30 m (98.4 ft) long by 10 m wide. In addition, 1944 and 1946 air photos indicate a farmstead (lancho) was located in this area, as evidenced by vegetation present. Although the site exhibits partial disturbance from mechanical equipment (push pile) and is listed in poor condition, it is eligible for listing in the
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National Register of Historic Places under criterion D.

Other historic properties, T-15-1 and PN-06, are in close proximity to the APE. However, both properties T-15-1 and PN-06 will not be affected by the proposed project.

**RESPONSE TO COMMENTS**

In accordance with Stipulation V.B.2.b. of the 2011 PA, the Navy has taken into account comments received within 45 days. Comments were received from the Guam SHPO by letter (RC 2017-0506 dated May 19, 2017). Guam SHPO’s comments are presented below with the DoD’s response italicized:

1) We have reviewed you Section 106 request on the subject undertaking and concur with your determination of “Adverse Effect”. The project will have adverse effect on two historic properties (T-9-1 and T-9-2) which are both eligible for listing in the National Register of Historic Places. We look forward to PA Memo #2 to resolve the adverse effects.

Thank you for your review of PA Memo #1 and for your comments regarding adverse effects on historic properties T-9-1 and T-9-2. The DoD has imposed conditions pursuant to 36 CFR §800.5(b) and determined that the project will have no adverse effect to the two historic properties (T-9-1 and T-9-2) within the APE. The conditions imposed are presented in the following section.

**DETERMINATION OF EFFECT**

The DoD originally found that the overall project would have an adverse effect on two historic properties (T-9-1 and T-9-2), and included that determination in PA Memo #1. While design studies such as topographic and geotechnical studies would not have an effect on historic properties, the construction phase of the project would have caused adverse effects.

Accounting for multiple factors, including historic properties, planners adjusted the layout of the earth covered magazines avoiding historic properties T-9-1 and T-9-2. In accordance with Stipulation VI.F. of the 2011 PA, the DoD has retained a full-time archaeologist to provide site checks, oversee coordination and execution of the archaeological mitigation measures in the PA and to provide quality control. This individual is on-staff at NAVFAC Marianas and has also been tasked with supporting Command Joint Region Marianas (CJRM) in responding to and reporting of any inadvertent discoveries to the Signatories, Invited Signatories, and Concurring Parties pursuant to Stipulation XII.

To safeguard the properties during project activities, the archaeologist will apply visual buffers around each site until the completion of the project. As an additional precaution, the archaeologist will conduct site checks. All contractors involved with the project will also receive cultural resources awareness training pursuant to Stipulation VI.D.1 of the 2011 PA.

Considering the conditions imposed on this project in accordance with 36 CFR §800.5(b), the DoD
has determined that this project will have no adverse effects on historic properties, as it will not alter the characteristics of the properties that qualify them for inclusion in the National Register of Historic Places pursuant to 36 CFR §800.5(a)(1).
FIGURE 1

P-290 ECMs
(Earth Covered Magazines)
Figure - 1

DoD Property
P-290 Area of Potential Effects (APE)

P-290 APE = 20.35 hectares (50.3 acres)
If submitting via e-mail, please click link and include all required information: criwebcomment@navy.mil

If submitting via postal mail, send to:

Attn: CRI Web Comments  
Code EV23, NAVFAC Pacific  
258 Makalapa Drive, Suite 100  
JBPHH, Hawaii 96860-3134

Submitted comments will be posted on the Navy's Cultural Resources Information (CRI) web site. Information presented on the CRI web site is considered public. The sections highlighted in red are required.

Privacy Act Statement
Personal information will only be used to contact you regarding the comments you submit. This information will only be shared with another government agency if your inquiry relates to that agency, or as otherwise required by law. We will not create individual profiles or give your information to any private organization. While you must provide a valid e-mail address or postal address, please DO NOT include personally identifying information such as a social security number.

By submitting this comment form, you agree not to include content that is offensive in nature, such as profanity, personal attacks on individuals, and racist or abusive language.

PROJECT: P-290 Design and Construction of Earth Covered Magazines and Ordnance Pads
SUBJECT: PA Memo #2

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