



Naval Facilities Engineering Command
Marine Corps Activity Guam Public Works
Department (MCAG PWD)
PSC 455 Box 195
FPO AP 96540-2937

MILITARY RELOCATION TO GUAM AND CNMI PROGRAMMATIC AGREEMENT (PA) MEMO #3

Project: Revised to address SHPO comments - J-755 Urban Combat Training Project – Construction for Training (Andersen South) (RC# 2013-1101)	Date: February 9, 2018 (comments due by March 16, 2018)
Project Location: Andersen South	Prepared By: MCAG PWD

PROJECT SUMMARY

Project J-755 (Urban Combat Training Project) is a Government of Japan-funded (Mamizu) project identified in Appendix E of the 2011 *Programmatic Agreement among the Department of Defense, the Advisory Council on Historic Preservation, the Guam State Historic Preservation Officer, and the Commonwealth of the Northern Mariana Islands State Historic Preservation Officer Regarding the Military Relocation to the Islands of Guam and Tinian* (2011 PA). This Programmatic Agreement Memorandum (PA Memo) covers the J-755 construction activities. The conclusion supported below is that there are no historic properties affected on Andersen South. Accordingly, as per Stipulation V.B.3., this PA Memo presents information to allow interested members of the public to provide comments on the Department of Defense’s (DoD) plan for addressing effects to historic properties.

The J-755 Urban Combat Training Project is being developed to serve training needs of the U.S. Marine Corps for the future Andersen South Training Complex (ASTC). Andersen South is located within the villages or municipalities of Dededo and Yigo. Project activities under J-755 include vegetation removal/management, utility trenching, building/structure demolition, excavation, grading, and preparation, renovation and construction of various permanent training facilities and areas.

This Revised PA Memo was produced to answer the Comments from the first and second submittals. One comment from the Guam State Historic Preservation Office (SHPO) State Archaeologist regarding potential *lancho* sites in the vicinity was addressed by a site visit seeking any evidence of such *lancho* still remaining on the property. This current revision addresses comments from the Guam SHPO.

PROJECT LOCATION

Formerly known as the Andersen Administrative Annex or the Marianas Bonins (MARBO) Command Annex of Andersen Air Force Base, Andersen South covers 787 ha (1,946 acres) in east central Guam. The installation is situated on the eastern side of the northern limestone plateau, about 5 km (3 miles) from the east coast of the island. Some of the traditional Chamorro place names in this

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vicinity are Mogfog, Pãgat, and Sasayan.

The J-755 project is located within the boundaries of Andersen South of Andersen Air Force Base, Guam. Additionally there is a communications corridor along Routes 1 and 9 and 3 that will serve the facility. The site is bordered by Marine Corps Drive (Route 1) to the north and Route 15 to the south. Andersen South generally slopes downward from the east to the west. The Area of Potential Effect (APE) shown in green on Figure 1 shows Andersen South areas affected by construction. Figure 2 shows the communications corridor added to the APE (total 293 acres, same as in PA Memo for Design Phase approved by SHPO in an email on October 14, 2016).

This PA Memo addresses this construction footprint APE. A prior PA Memo was delivered March 9, 2017 to the Guam SHPO. The SHPO responded via letter (RC# 2013-1101, March 21, 2017) to Marine Corps Activities Guam Public Works Department (MCAG PWD) regarding that PA Memo with their concerns. A meeting was held between SHPO and MCAG PWD, during which these comments were discussed on March 28, 2017. This Revised PA Memo #3 is restricted to the areas requiring construction in accordance with the 2011 PA.

PROJECT DESCRIPTION

The purpose for this project is to construct a facility to provide realistic training for personnel utilizing the Andersen South Urban Combat Training Complex. This phase of the project covers the construction of the facilities and training areas (Figure 1).

GUAM SHPO COMMENTS & DoD RESPONSES ON FIRST PA MEMO #3

The following 9 comments from SHPO were dated January 9, 2018. The draft responses from DoD are in italic following each SHPO comment. (NOTE: public comments can be viewed at:

https://navfac.navy.mil/navfac_worldwide/pacific/about_us/cultural_resources/previous-pa-memos-.html)

1. We believe that the Operations and the Construction of J-755 should not stand alone or be separated and if reviewed as such, our findings will result in an adverse effect determination. Therefore, we will anticipate another PA Memo for Operations in due time. This is analogous to constructing a new house - approvals on construction plans are gathered, then an "Occupancy Permit" issued. The Occupancy Permit is withheld if there are changes contrary to what's been approved. Section 106 or the 2011 Programmatic Agreement process does not defer "to a later date" (pg. 3 PAM), on the identification of sites that may potentially be eligible for listing on the National Register of Historic Places (NRHP). Though you are separating the Construction and Operations, we are considering both under one APE (Area of Potential Effect), and not two APEs as intimated, unless they are revised under another Revised PA Memo.

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Unlike NEPA, where separation of projects into components (segmentation) is not allowed, Sec. 106 and related regulations (36CFR800) do not prohibit separation of actions. Construction of facilities for J-755 will impact a small area within Andersen South. The area has been surveyed and no historic properties have been documented in the construction APE. Operation of the facility will occur after construction; it is a future action that may include a variety of impacts throughout the Andersen South area. Per 36CFR800.4(b)(2), DON can conduct phased identification efforts consistent with the 2011 PA to address complexities in identifying sites within a large land area and/or to further refine our understanding of potential sites based on feedback from the SHPO.

2. As raised by the State Archaeologist in a meeting with MCAG representatives on September 11, 2017 regarding ranches in the area (Please note that Chamorro words are not pluralized by adding an "s" at the end of the word. This would have been caught in the unrevised PA Memo had the SHP Officer reviewed it). In the meeting mentioned, the MCAG representative openly admitted that the archaeologist who conducted the survey in the APE did not consider pre-WWII or immediate Post-WWII ranches as historic properties. In our research, the existence of ranches is supported in Welch's 2010 reporting of the 2007 surveys for the military buildup. We believe there is new information that has come to light, considering that the previous studies did not consider Guam history as it was in the late 19th and early 20th centuries as part of their Section 106 responsibility. It is apparent, along with the architectural studies that were called for in the previous reports that these needed to be completed before any determination can be considered.

There is a misunderstanding in the statement that "the MCAG representative openly admitted that the archaeologist who conducted the survey in the APE did not consider pre-WWII or immediate Post-WWII ranches as historic properties." No domestic sites dated to that time period have been discovered in the area. The context was a discussion of why possible lancho locations had not been covered in the background information contained in the Welch 2010 report. During our meeting, we acknowledged that these properties were not considered in the report. We reviewed the report after that meeting to confirm this conclusion and found that ranches are mentioned several times in the background and in one of the oral histories. Claims that DON did not consider domestic structures from the 19th and 20th centuries are not accurate, as evidenced by reference to such properties in Welch 2010. The focus of the report in discussing the historic period appears to have been on the WWII hospital and post war developments, which were major constructions in the area, possibly destroying earlier sites. Records of the MARBO facility and the 204th Army Hospital were available and these facilities were extensively discussed in the report. Chamorro ranches are an important component of Guam's history. We suggested that information about the ranches could be included in the upcoming J-755 technical report and the public information document. That recommendation

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will be made. The 1913-14 map provided by SHPO was geo-referenced to a satellite image, coordinates of the lancho locations were derived and MCAG archaeologists inspected those indicated lancho locations closest to the proposed construction APE. The locations had been bulldozed and covered with recently deposited household garbage from trespassers who illegally accessed the property. This (illegal dumping) was observed throughout the area, wherever public access is possible. We did not find any artifacts dating to the mid-20th century or earlier. Regarding the recommendations made by an architectural historian for additional studies; the individual making the recommendation was commenting on issues outside of their area of expertise. DON appropriately considered their comment, but due to insufficient justification, did not act on their recommendation.

3. The documentation and survey information compiled on Andersen South in the Kaschko and Welch 2002 assessment survey indicates that they only conducted field inspections on areas that were previously researched, which was limited. The Kaschko fieldwork was completed in five days for approximately 1,550 acres in Andersen South. In our opinion, this kind of limited and restricted survey is not a good faith effort for identifying historic properties. SHPO staff iterated to the representatives that "... the Architectural Historian who examined some of the infrastructure remains at the site recommended further research before a final determination of eligibility is made on two areas" (Final Report, Archaeological Surveys and Cultural Resources Studies on the Island of Guam in Support of the Joint Guam Build-Up Environmental Impact Statement, Volume I: Narrative, p. 322, Welch 2010). Later in the document, these infrastructure remains are labeled not eligible - without conducting further research. We feel that these areas require additional research to fulfill the initial assessment by the Architectural Historian rather than the eligibility noted on page 357, table 16.3.

The infrastructure sites have no standing buildings; they are archaeological sites and the archaeologist determined that the sites are not eligible as archaeological sites. SHPO did not raise these issues when they reviewed PA Memos for Andersen South Design Studies. The referenced Kaschko and Welch (2002) effort was described in Welch 2010 as a "limited reconnaissance." As such, the 2002 investigation probably missed some things; however, such investigations may be referenced in identification efforts that meet reasonable and good faith efforts. ACHP has published guidance providing information on what is required of a reasonable and good faith effort to identify historic properties (http://www.achp.gov/docs/reasonable_good_faith_identification.pdf). The document lists acceptable methods and also lists what is not required. Some key points are listed.

- *Does not require "approval" of SHPO or other consulting party;*
- *Does not require identification of every historic property within the APE;*
- *Does not require investigations outside of or beneath a properly documented APE;*
- *Does not require ground verification of the entire APE.*

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4. The recommendations for the two infrastructure areas reported by International Archaeological Research Institute, Inc. (IARII) are the MARBO Installation Infrastructure, IARII Map No. 1066, GHPI Site 66-04-2911, and the 22nd General Hospital Infrastructure, IARII Map No. 1051, GHPI Site 66-04-2912. These infrastructures were recommended for an Architectural Historian to investigate archives and obtain oral histories to clear the ambiguities regarding the history of the sites and to better define the boundaries of the Army Hospital. These sites can be found in Figure 15.3 of the report and the recommendations on page 324 (Welch 2010). Since these sites will be impacted by the construction project, we highly suggest following through with the Architectural Historian's recommendations before any concurrence is requested by MCAG.

See previous responses. Note that DON is not required to follow recommendations made by contractors in reports. In this case, an architectural historian is commenting on what is essentially an archaeological site, as there is no standing architecture, therefore, no integrity. The archaeologist recommended the site as not eligible due to loss of integrity. However, the report contains thorough documentation of both the Army hospital and the MARBO site. Additional research is unlikely to make significant additional contributions to the information already available in the Welch 2010 report.

5. In overlaying Figure 5 (PA Memo), it clearly does not show all the ranches (*todu i lancho*) in the area. The ranches indicated on the 1913-14 maps clearly match up with those located on the 1944 map which is much clearer; we could not understand how or why they were missed. As regards the late Senator Angel L. G. Santos Family Farm, there are many individuals on Guam that MCAG can request information from on where the family farm and arrest site are located. The Senator's mother is still alive and we are certain she knows exactly where the family farm is. The DoD and the U.S. District Court should have records on the arrest.

MCAG GIS specialist overlaid the Andersen South boundary over the 1913-14 map referenced by SHPO to determine the locations of ranches in the area. The overlay that the restricted Figure 5 was taken from is transparent (see appended document); no additional lancho locations shown within the Andy South boundary. DON only considers effects on properties within the APE. Based on the 1913-14 map, there are other ranches outside the APE. The other ranch shown NW of Mogfog was located in what is now American Grocery in Dededo.

6. MapNo 977 (T-13) site, which was not relocated during the Welch 2010 survey of selected areas, is noted that the "extent and current subsurface condition remains unknown (Kaschko and Welch, 20010). If this site was destroyed by construction, please provide us the Section 106 that called for the removal-destruction of a potentially eligible site. The maps for this site indicate that it is located within the Construction portion of the APE.

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Welch (2010) refers to MapNo 977 (T-13), recorded in Kaschko and Welch (2002), as “potsherds and fire-altered coral in disturbed pig wallows; the site was not relocated during the current survey. It is unlikely that the site was destroyed by construction between 2002 and 2010. It is more likely that the site is similar to the typical site type found in recent surveys of the northern plateau: sparse ceramic scatters with evidence of cooking one or more meals. MCAG archaeologists will visit the reported location and attempt to find evidence about the location and condition of the site. Other sites have been discovered by inspecting pig wallows. Although ungulate activity can facilitate locating sites, their actions are very damaging and may have destroyed the site directly or from subsequent erosion.

7. In reviewing AS-T-2008-01 shovel test pits (Stp) site map - it failed to delineate the site, i.e., not defining the entire site and noting it on Site Map Figure 2.1-8 (TEC and MARC, 2011). Site map AS-T-2008-01 shows the site as a rectangle in nature with one side running along a modern road. As the survey was limited in scope, no testing was conducted up to the road or on the other side of the road, nor were any Stps placed below the haligi, tasa, or lusong.

No cultural material was found in shovel tests on the site. The suspected latte elements and a lusong have been historically displaced from their original location. The report states that there was a bulldozer berm running parallel to the paved road that may have moved the cultural material. Site boundaries were based on surface evidence, as no subsurface deposit was found. Although disturbed, the site was determined eligible and additional investigation is planned. Additional investigation may locate intact deposits that can provide more details about the site. Regarding site boundaries, frequently, additional investigation leads to refinements of survey level data. The boundary established through data recovery will be based on detailed scientific information that was not available as a result of survey-level investigations. It is expected to be more accurate.

8. The surveys for Andersen South have been limited not only in scope but in areas that apparently lacked examination or identification in pertinent periods of Guam history. To say there were no domestic artifacts found is because it was not in their scope to examine this period in Guam history for such artifacts, thus, they would have overlooked any artifacts from this time period. MCAG is correct that over a decade has passed since this area was surveyed and in some areas, two decades. We supposed you would agree with our office that a resurvey of Andersen South is justifiable. With regards to MCAG PWD Archaeologist providing a survey of the roadway, we previously noted that the sites noted in Figure 5 are off and other ranches were not located and identified. Also, one cannot relocate the datums to reconstruct approximate shovel test locations to verify site dimensions even if to assess the sites today. It was stated that even a decade ago they could not relocate some sites due to their methodology.

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If previous studies had located domestic artifacts, this information would be included in the report as a site or occurrence. Regarding a survey of a roadway, that is an incorrect statement, as no roadway was surveyed. The State Archaeologist may have misinterpreted our statement that the reference to the roadway was to demonstrate the accuracy of the 1913-14 map overlay onto the current satellite imagery. We noted that the GIS work that aligned the maps was accurate because as we followed the road, our GPS track matched with the road location shown on the map. We did look at the road for any artifacts that might be associated with the sites, but we did far more than “survey the road.” Archaeologists searching for evidence of ranches walked along a roadway to access the locations shown on the 1913-1914 map as lanchos locations. Regarding criticism of DON survey methodology, Please reference ACHP’s guidelines for what constitutes a reasonable and good faith effort. DON has exceeded the minimum effort required to identify historic properties based on ACHP’s guidelines. Note that the guidance also includes what is NOT required to constitute a reasonable and good faith effort.

9. Considering the methodology, limited survey sampling, the ambiguity of the written record, and the absence of consideration for known property types that may be eligible for listing on the NRHP, including not finding previously known sites, the identification and evaluation efforts of MCAG do not meet today's standards neither does it present to us a good faith effort to adequately comply with the identification and evaluation process in Section 106. Again, in light of all the above issues brought to bear, we are highly recommending submitting to our office a Research Design for the Resurvey of Andersen South. If you are not in Agreement with our assessment of this Revised PA Memo #2, we can either consult further on these issues, or you may process your disagreement or objections through the appropriate Stipulation outlined in the 2011 Programmatic Agreement.

DON uses standard archaeological methods that are approved by ACHP for identifying historic properties. Recommendations were made in the report by various professionals in multiple disciplines (some recommendations crossing areas of expertise). DON has adjudicated the recommendations and has made the appropriate determination based on consideration of all factors. In the examples referenced at Andy South, the architectural historian is making recommendations for additional investigations at an archaeological site, as no structures remain. The archaeologist determined that the infrastructure remaining at the site is not eligible and DON has concurred with that determination. The report was completed by qualified archaeologists and submitted to SHPO in 2010. With no comments received from SHPO, DON must rely on the information provided in the report. The 2002 survey referenced by SHPO as covering 1500+ acres in 5 days is obviously a reconnaissance level survey; still, it can be referenced in efforts to identify historic resources.

Regarding failure to re-locate known sites, there are many reasons for this. Sites may have

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been georeferenced with less accuracy or other map projections might have been used. Sites recorded prior to common use of accurate GPS will have locations that have less precision. It is also possible that a site was destroyed in the years between discovery and efforts to re-locate it. If the site was destroyed prior to enactment of the NHPA in 1966, there was no federal law requiring consideration, so documentation is unlikely to exist. Regarding the site referenced as Map 977, that site was described as “potsherds and fire altered coral in disturbed pig wallows.” Again referencing ACHP standards, 100% of the sites in the APE do not have to be found and 100% of the land area of the APE does not have to be covered.

The comment that certain types of sites were not considered is incorrect. The State Archaeologist, in a discussion about lancho locations at Andy South, stated that the Welch 2010 report did not include information about Chamorro ranches in the background material. MCAG acknowledged that this is a short coming in the report and suggested that the information would be included in the future report and in the accompanying Public Information booklet. There was nothing in the report or in the discussion to suggest that lancho sites were not found because they were not considered. In fact, lancho sites are specifically called out in multiple locations in the Welch 2010 report (pages 26, 27, 47, 48, and 312; also in an interview of a former resident of the Mogfog area on pages 411-415), so it is not accurate to say that this resource type was not considered. Figure 3.6 of the Welch 2010 report indicates areas where five meter interval transects were walked. Sites and artifacts from any period would have been documented by the survey. The fact that no domestic artifacts or structures from any time period were found does not mean that the surveyors did not consider them. It is not surprising that in an area so intensively developed, lancho sites, sometimes ephemeral at best, were not found.

DON will not be re-surveying Andy South; however, we will continue working with SHPO to resolve issues based on the best available scientific data. We have offered to visit specific locations where lancho locations are indicated on old maps. Two such locations near the construction area have already been reassessed. Both locations were found to be historically bulldozed and no structures or artifacts associated with the mid-20th century and earlier were found. We did find some corrugated metal at one of the locations, along with a few scattered concrete blocks, plastic barrels and a plastic pipe. The barrels and water pipe suggest that there may have been a lancho at this location, but there is nothing to indicate where a structure might have stood. Such sites did not always include durable structures, and even where lancho sites with cisterns have been documented in DON project areas, some had associated artifact scatters; others contained only a few associated artifacts. The degree of disturbance and the variety and intensity of activity at the lancho are probably factors.

The prominent future site type at Andy South is the illegal dump. There is a concentration of recent trash, some within intact garbage bags along roads and in clearings throughout the

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western portion of the APE. Satellite images show roads and trails leading into the area from residential areas to the west of the installation where there is no fence. We have committed to continue searching additional locations indicated as lancho sites on the archival maps, specifically looking for evidence confirming that a lancho was present; however, considering the extent of disturbance at the two sites we have visited, the confusion caused by illegal dumping, confirming the existence of a lancho with some degree of integrity might be difficult.

MITIGATION OF IMPACT ON HISTORIC PROPERTIES

Scope of DoD Mitigation Efforts

The training areas that will undergo construction activities have been laid out so as to avoid all historic properties. Therefore, no mitigation is expected in this phase.

DETERMINATION OF EFFECT:

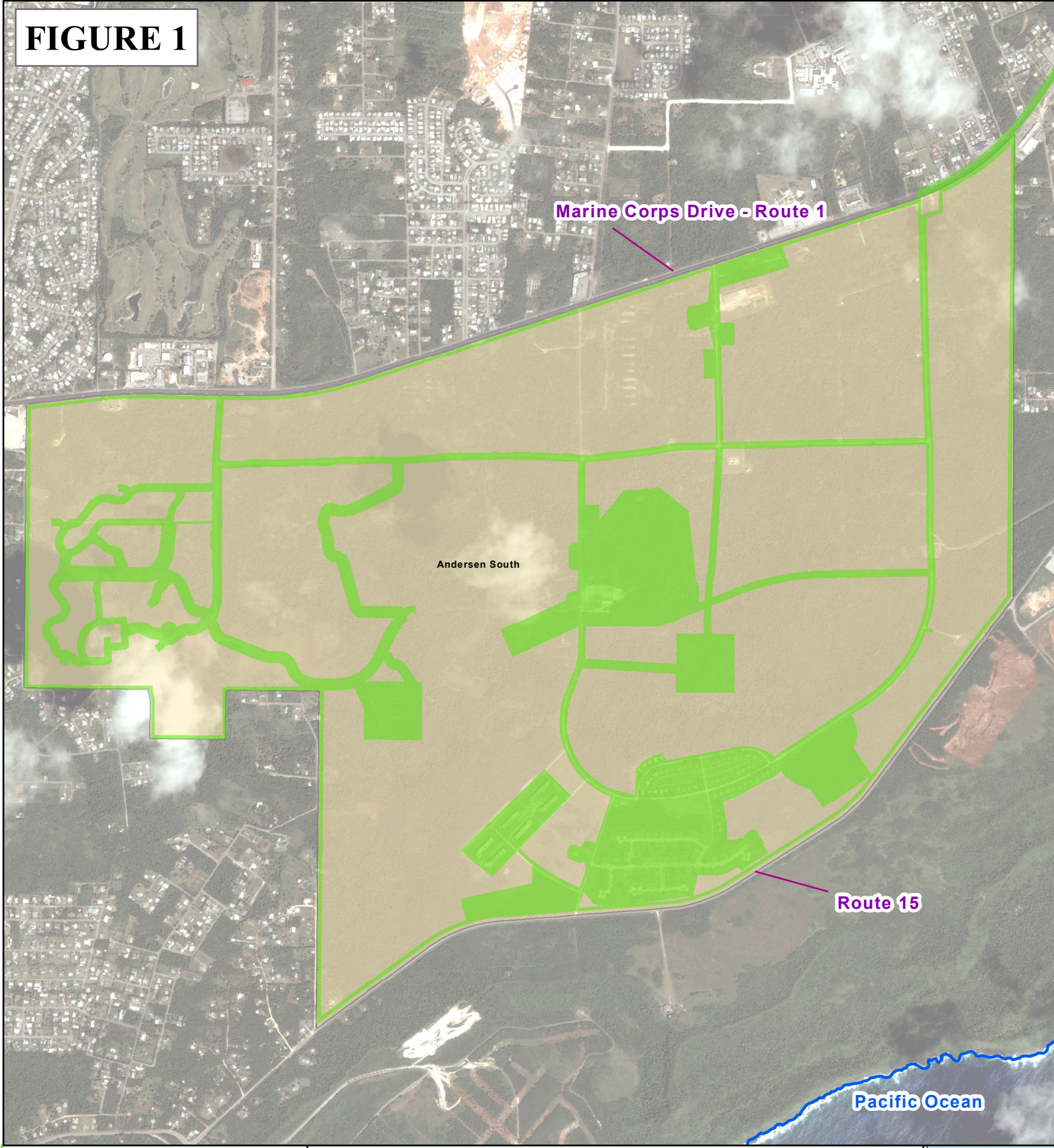
It has been determined by MCAG PWD and SHPO that the construction of the communications corridor along Routes 1, 3 and 9 will have no historic properties affected, as none have been discovered along the corridor approved by SHPO for geotechnical borings in October of 2016.

The construction phase APE of the Urban Combat Training Project on Andersen South, similarly will have no historic properties affected as the construction footprint was laid out purposefully to avoid all potential historic properties. The issue of potential historic *lancho* sites in the construction APE of training area 1 has been investigated. No historic *lancho* properties are within the construction APE.

Maps and Comment form follow

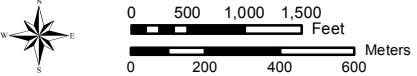
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FIGURE 1



**J-755
Urban Combat Training**

**Andersen South J-755 APEs
(Construction and Operations)**



 Area of Potential Effect (APE)
for Construction Activities at Andersen South

PREPARED BY:
Naval Facilities Engineering Command
Marianas
Date: 3/8/2017



Coordinate System: UTM Zone 55 North
Projection: Transverse Mercator
Datum: D WGS 84

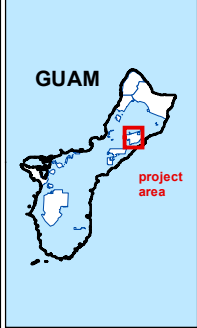
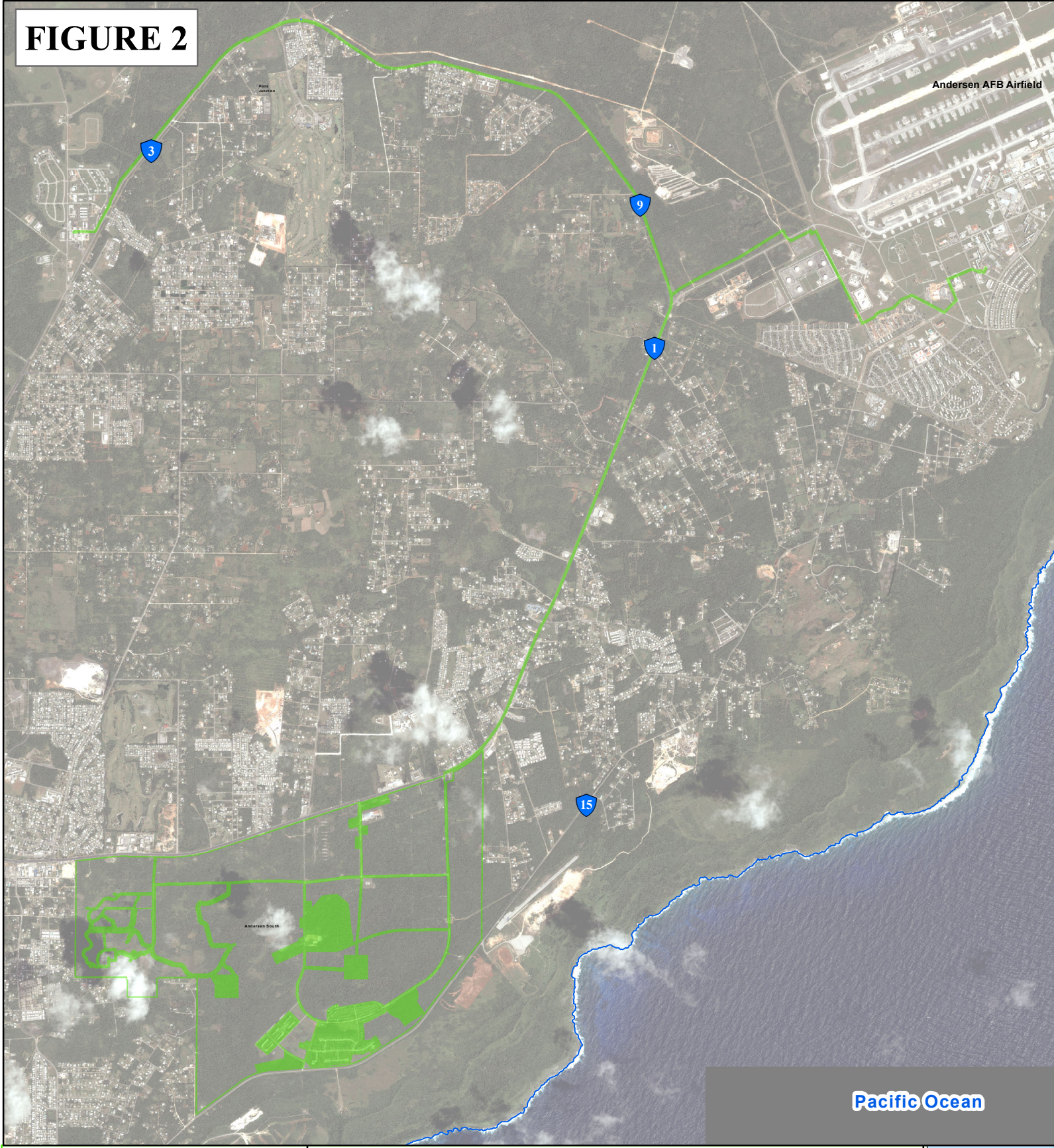
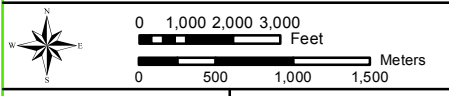



FIGURE 2



**J-755
Urban Combat Training**

**Andersen South J-755
Construction APE and Utility Corridors**



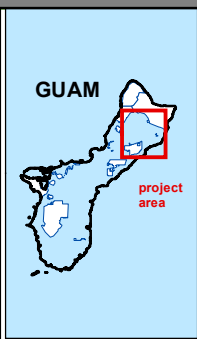
 Area of Potential Effect (APE)
for Construction for J-755

PREPARED BY:
Naval Facilities Engineering Command
Marianas
Date: 3/8/2017



Coordinate System: UTM Zone 55 North
Projection: Transverse Mercator
Datum: D WGS 84

Pacific Ocean



If submitting via **e-mail**, scan and send to: 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 to be completed in order for a comment to be posted.

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: J-755 Urban Combat Training Project – Construction (Formerly Andersen South)

SUBJECT: PA Memo #3, Determination of Effect

Date: _____

Name: _____

CRI User Name (if you don't want your real name to be posted with your comment on the CRI web site):

E-Mail Address: _____

and/or

Postal Mail Address: _____

COMMENTS: _____

COMMENTS: _____

