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Governor  
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**William N. Reyes**  
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Deputy Director

State Historic Preservation Office  
Guam Department of Parks and Recreation

May 24, 2018

**LETTER TO SIGNATORIES, INVITED SIGNATORIES, AND CONCURRING PARTIES  
REGARDING THE 2011 PROGRAMMATIC AGREEMENT FOR THE MILITARY RELOCATION  
TO GUAM AND THE COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS**

**From:** Lynda Bordallo Aguon  
Guam State Historic Preservation Officer

**To:** Signatories

Rear Admiral Shoshana S. Chatfield  
Commander Joint Region Marianas  
U. S. Navy, Department of Defense Representative Guam,  
Commonwealth of the Northern Mariana Islands, Federated States of  
Micronesia and Republic of Palau

Brigadier General, United States Marine Corps  
Deputy Commanding General, Marine Corps Forces Pacific

Executive Director  
Advisory Council on Historic Preservation

State Historic Preservation Officer  
CNMI Department of Community and Cultural Affairs

Invited Signatories

Brigadier General, United States Army  
Commanding General, 94<sup>th</sup> Army Air & Missile Defense Command  
United States Army Pacific

Regional Director, Pacific West Region  
National Park Service, U. S. Department of the Interior

Division Administrator  
Federal Highway Administration, Hawaii Division

Concurring Parties

President, Department of Chamorro Affairs

Chief Program Officer, Guam Preservation Trust

Subject: OBJECTION TO ACTIONS CARRIED OUT IN THE IMPLEMENTATION OF THE PROGRAMMATIC AGREEMENT PURSUANT STIPULATION XIII – RESOLVING OBJECTIONS

Dear Signatories and Parties,

Provided for your review is written documentation of objections prepared by the State Archaeologist, which I fully supported in its preparation. Stipulation XIII of the Agreement requires the parties to consult, as appropriate, for up to 45 days to resolve the objections.

Last September, we wrote to the Advisory Council requesting to re-evaluate the full effects of MILCON P-715 on historic properties and to pause its construction until such time the re-evaluation was completed. We were informed that our candor was appreciated and our willingness to reach out to them. They reminded us that the TRRA and RMP were carried out in accordance with PA Stipulation V(C)(2) and Stipulation V(C)(4), respectively, which implied to us, that the execution of the RMP is, in effect, a foregone conclusion. We were then presented with the option to “invoke” Stipulation XIII should we wish to pursue the matter further.

We fully understand, that although the TRRA and the RMP were developed, discussed, and consulted on with the parties of the PA in 2015, it does not diminish or weaken our position to re-evaluate the full effects of MILCON P-715.

The documentation provided defined objections related to several military projects – LFTRC (P-715), Main Cantonment (J-001B), Anderson South Training Complex (J-755), and Water Well Development (P-103). We anticipate that your review of the documents will generate constructive and useful exchanges of information that will eventually resolve the objections to the satisfaction of all the parties.


*Si Yu'os Ma'āse'.*

Sincerely,

  
Lynda Bordallo Aguon  
Signatory

April 17, 2018

Memorandum

To: State Historic Preservation Officer 

From: State Archaeologist

Subject: Objections Regarding the following:  
Stipulation IV. Identification and Evaluation of Historic Properties  
Stipulation V. Assessment and Resolutions of Adverse Effect  
Stipulation VI. General Mitigation Measures  
Of the 2011 PA For the Live-Fire Training Ranges, the Main Cantonment, South Andersen and the Water Well Development, Design and Construction areas.

In reviewing the documents, emails, reports and PA Memos I have the following objections to Department of the Navy, Pacific Division, Naval Facilities Engineering (NAVFAC PAC) reasonable and good faith effort in the identification of historic properties. The areas for these objections are known as Live-Fire Training Range Complex (LFTRC), (Milcon J-715), the Main Cantonment Areas (Milcon J-001B), South Andersen (Milcon J-755) Water Well Development, Design and Construction Areas (P-103). My objections are listed below along with the attachment letters and maps.

1. Objections to the archaeological surveys used to identify historic properties for the Guam Build-Up. The shortcomings of these surveys were pointed out to NAVFAC PAC in the first review of the Environmental Impact Statement (EIS), in the Supplemental EIS (SEIS), in the In-Fill Studies, with the other assessments, and up to the premature data recovery efforts.
  - a. The archaeological surveys conducted from 1988 to 2009 throughout the areas were Pedestrian Surveys with little to no subsurface testing and were not performed to current standards. This was pointed out to Ms. Patty Conte Archaeologist NTR/NAVFAC PAC in the early stages of the EIS and the SEIS. The DoD response of September 5, 2014, was that the "SEIS is utilizing one or more methods stipulated by 36 CFR 800.4 (b (1.)). The purpose of these studies was **simply** to gather enough information to support the analysis of alternatives for purposes of the SEIS." (Attach. 1). However, this information was later used and is still being utilized to try and justify the presence or absence of no historic properties in the areas of potential effect (APE). I believed that subsurface testing was necessary throughout the survey areas, which was scarcely conducted. Much of these areas had been impacted by surface bulldozing. My concerns were and are that buried A horizons and features existed below the surface, making a pedestrian survey inadequate to identify historic properties. In the Department of Parks and Recreation's (DPR) July 2, 2014, letter to Ms. Karen Sumida, Business Line Manager, NAVFAC PAC (Attach. 2) we indicated that the sites were not

properly identified or tested using Shovel test pits (Stps). Premature data recovery efforts at the LFTRC found both A horizons and features subsurface, covered by both mechanical and natural movement of soils. These recent contractual data recovery efforts were inadequate in properly identifying the boundaries of archaeological sites and were basically a partial evaluation of the archaeological sites and not a data recovery mitigation in my opinion.

- b. On August 4, 2015, we informed Ms. Carly Anton, Archaeologist NAVFAC PAC “in reading Welch’s 2010, Vol. I, Guam Historic Properties Inventory (GHPI) Sites 66-08- 2701 and 66-08- 2702 were never found in the Main Cantonment area (J-001B). These sites could have easily been missed because of the conditions described on pages 143 and 144 (Attach. 3) of the report above, “in some areas....fallen dead leaves and fallen trees completely obstructed a view of the ground surface.” “In areas of extremely dense forest the survey team walked or crawled along animal paths within each of the 10 m (33ft) wide transects, as these paths provided the most visible ground surface.” “In these areas small artifacts were likely overlooked because they were hidden by the leaf debris or in tall grass/fern meadows by the thickness of the plant material. Most artifacts were found along animal paths, especially in areas of densest vegetation. In order to identify as much of the cultural material as possible each member of the team moved back and forth (that is left and right) as they proceeded along their individual transects to the transect end point where visibility was not optimal.” Garmin GPS units were used in the field, these hand held GPS can easily be inaccurate up to 30 meters or more in the field unless highly modified. This may account for why some sites were not relocated in the field. We now know that buried horizons are present approximately 30 cm below the surface. Therefore, I feel the description of the field work done in 2007 would require automatic resurvey of the areas with subsurface testing.

In November 2017 we received the, *Draft Technical Report Archaeological Data Recovery in Support of the J-001B Utilities and Site Improvements at Naval Base Guam Telecommunications Site, Guam*. On page 11-1 it states that GHPI “Site 66-08-2701 was relocated during the current investigation utilizing the UTM coordinates in the prior survey by Haun (1988).” In reading Haun’s *Final Report: Archaeological Reconnaissance Survey and Field Inspections of Relocatable Over-The-Horizon Radar Sites on Guam, Mariana Islands, Micronesia*, I cannot find any UTM coordinates, nor is there any description of any GPS equipment being used for recordation. I do not recall being informed nor can I find any record that a survey was being conducted to relocate GHPI Site 66-08-2701 during the Data Recovery efforts for J-001B. Any relocation of the GHPI Site 66-08-2701 would be considered a survey, which then would be evaluated before any data recovery mitigation efforts would be agreed to and implemented.

- c. Sections of the LFTRC and Main Cantonment surveys were conducted in 1988 by Paul H. Rosendahl, Ph.D., Inc. (PHRI) for Wilson Okamoto and Associates, Inc. "The filed inspections were limited by contractual agreements to one-half work day each." (p. 4, Haun, 1988). Transects were run at 90 foot /27.43 meter intervals. Today transects would be run at 32 to 16 foot /10 to 5 meters intervals depending on the density of the vegetation and surface visibility while incorporating subsurface testing. From visiting the areas I know that ground visibility is poor, the 1988 Final Report by Haun does not have a single photograph in the report. I believe the more recent surveys and data recovery efforts were also limited by contractual agreements; limited to pedestrian survey, limiting the amount of Stps to delineate a site, and the number of excavation units (EUs) to examine a site. I feel that sites were not properly defined or evaluated to initiate data recovery mitigation efforts. I believe NAVFAC PAC contracted for data recovery efforts before the historic properties were fully identified placing the budget over the cultural resources and I believe this has been done in every aspect of the build up by NAVFAC PAC.
- d. In our January 20, 2015 letter to Ms. Carly Antone, NAVFAC Pacific, RC2014-0625 on J-001B Welch's 2010 report (*Archaeological Surveys and Cultural Resources Studies on the Island of Guam in Support of the Joint Guam Build-Up Environmental Impact Statement*) (Attach. 4) we pointed out that the "field team was not able to cover two areas during the time allotted for the survey" (143, Vol. I). However, I later learned that these areas were surveyed in 2008 and reported separately in 2009 by the same company. Welch's 2010 report reflects only the surveys conducted in the summer of 2007. However, Welch did not resurvey Kurashina's 1987, Haun's 1988 or Highness & Haun's 1990 work where transects intervals varied between 90 and 180 feet. Other areas noted here were never surveyed, even though they were densely forested. Our response of January 20, 2015, included a map marked with the areas not previously surveyed, what needed to be resurveyed from the 2010 report including systematic subsurface testing. This testing would have provided information on the area and possibly expand the boundaries of the Magua Settlement Site, GHPI Site 66-08-2303 and GHPI Site 66-08-2302, since the 30-year old survey area abuts these sites. These statements were again back up by our March 31, 2015, letter to Ms. Carly Antone (Attach. 5). However, NAVFAC PAC believes they had made a good faith effort to identify historic properties. I do not agree that this work meets the criteria of a reasonable effort of identifying historic properties. Furthermore, I believe the archaeological identification efforts of historic properties were restricted by the DoD budget and that the identification of historic properties was considered secondary.
2. Objection to the Historic Context information on which the surveys were based. The previous surveys did not fully take account of 19<sup>th</sup> and 20<sup>th</sup>-century ranches also known

as “*lâncho*” in their survey. This important and significant part of Guam’s history was not clearly defined or investigated during surveys of Andersen South and greatly overlooked at during the surveys at the Main Cantonment and LFTRC areas. When the LFTRC information was presented it opened questions to other historic contexts that were not fully explored. We have extensively pointed out to the DoN the unresolved issues with concerning the historic contexts on all of the Milcon Project.

- a. Andersen South, MILCON J-755: In the October 10, 2017 meeting with Marine Corps Activity Guam (MCAG), Environmental Director, Albert Borja, MCAG Archaeologist, Ronnie Rogers and Navy Liaison, Sandy Yee, Mr. Borja disclosed that the previous surveys did not fully take into account these 19<sup>th</sup> and 20<sup>th</sup>-century sites and that the architectural surveys needed more work on Andersen South. Recently, MCAG has backtracked saying they were mistaken when “*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.*” MCAG now says no sites were found during those early surveys and recent visits to these locations have been “*bulldozed and covered with recently deposited household garbage from trespassers who illegally accessed the property*” (PA Memo #2 Revised). Our January 9, 2016 letter to Mr. William Arnold (Attach. 6) concerning the Revised PA Memo pointed out the failings with the identification of historic properties and requested for resurvey of Andersen South. The DoN’s GIS positions of where they inspected for the *lâncho* were way off of where the *lâncho* were positioned according to our records. The other issues concerning other historic properties are located in the letter to Mr. Arnold.
- b. In reviewing the Main Cantonment area during the SEIS, I noticed that *lâncho* were not a big part of the historical or archaeological focus. One farm, in particular stuck out on the 1913-14 map and again showed up on the 1944 map. I brought this *lâncho* to the attention of the DoN and they commented that the archaeologist must not have found anything in their 2007 survey. My response was that this period was undervalued as part of the history of the area on Feb 4, 2015 we visited the area. Within 10 minutes of entering the jungle, I was able to locate the site. A large concrete cistern approximately 12 x 12 x 4 ft stood out on the landscape. Several push piles were located in the surrounding the areas possibly from the 1950s. A patch of *pupulu* approximately 12 x 12 ft was located west of the cistern indicating evidence of horticultural practices within close proximity to the ranch. It is my belief that no survey was ever conducted in this area as is it would be almost impossible to miss such a site even in a pedestrian survey conducted at 15 meter intervals.
- c. The DoN has not fulfilled the architectural eligibility of two sites described in the *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. 322-323, Welch 2010. The two areas of infrastructure “The architectural historian who examined some the infrastructure at the site, recommended further research before a final determination of eligibility to the NRHP is made.” However, later in the document, these infrastructure remains are labeled not eligible without any further research being conducted. I feel that these areas require more research to fulfill the initial assessment by the Architectural Historian rather than eligibility noted in table 16.3 on page 357.

- d. In reviewing the LFTRC's APE in the SEIS we noticed that the roads in the area and other structures indicated on the historic maps were not considered as historic properties. Therefore, we requested that further studies be conducted. The DoN produced the Old Ritidian Road document (Attach. 7) to supplement the history of the area. This documentation resolved some inquiries, but raised questions concerning the existence of other historic properties in the area. A portion of the Old Ritidian Road runs through the LFTRC, and the supplemental history taken from ONI-99 verbatim mentions several structures; Machanao patrolman's quarters and settlement, Ritidian Lighthouse, “Machanao hamlet.” There is no mention of these structures in the previous reporting and may very well be within the APE of the LFTRC. Conducting pedestrian surveys in areas of low visibility, due to thick jungle or heavy dead foliage makes it hard to believe these sites would ever be found using pedestrian survey methodology. The background on Machanao patrolman's house and settlement, which may be the hamlet is basically non-existent as is that of Machanao Mountain.
3. Objection to the quality and methodology of the surveys. The information provided to our office concerning the surveys, and the review thereof the subject undertakings.
    - a. A 2015 survey conducted by Cardno for the LFTRC (Milcon 7-15) found no historic properties in an indirect impact area. However, not a month later a THAAD's project overlapped the LFTRC APE (Attach. 8). The survey conducted by another company found two significant historic properties within the overlapping survey area. GHPI Site No. 66-08-2733 and GHPI Site No. 66-08-2733 are within the previous indirect impact area. GHPI Site No. 66-08-2733 is approximately 26 x 12 meters and GHPI Site No. 66-08-2735 is approximately 30 x 20 meters in size. These overlapping surveys were noted on Dec. 7, 2015 in an email to Ms. Antone. The missing of such large archaeological sites considered eligible for listing in the National Register of Historic Places begs for resurvey with consistent subsurface testing throughout the LFTRC. These sites may have been missed due to lack of visibility covered with dead foliage at the time when the Pedestrian Survey was conducted. Nonetheless, I am highly suspicious of other areas that have been surveyed not only here, but with all of the Milcon Projects due to flawed methodology.

Recently a lusong (mortar) was found in the Main Cantonment area protruding from the ground in a previously identified as a WWII bottle scatter (Attach. 9). The initial bottle scatter reported by International Archaeological Research Institute Inc. in 2009 but was not reported as a site. Our office had asked for more information on the site and a MCAG team provided a brief report in November 2014. The site was assigned a GHPI No. 66-08-2699 and a GHPI data form proved our office, small pieces of Latte period pottery were found during this MCAG investigation according to the data form. This site had been investigated twice by archaeologists, once by contracting archaeologist and the second by the MCAG's team. The Latte period lusong was only found by a person conducting a geo-testing survey. We are not sure if the lusong was located in close proximity to the previous found pottery in 2014 or not at this point in time. These multiple visits and finds speak to the quality of the surveys, what will be found on the next visit.

The Magua Settlement Site, GHPI No. 66-08-2303, which I mentioned above directly relates to the quality and methodology of the surveys. I believe the site extends beyond the present boundaries, nonetheless these boundaries were not fully tested or defined, even during the data recovery efforts because of environmental concerns and UXO in some places. However, I have not finished the review of the premature data recovery efforts for this site at this time.

- b. In our September 3, 2013, letter to Ms. Karen Sumida (Attach. 10), we indicated that the *In-Fill Cultural Resources Reports for the Live Fire Training Range Complex...* noted that "heavy vegetation limited ground-surface visibility in the project area and may have obscured cultural remains." My email of August 20, 2014, to Ms. Patricia Conte mentions that areas of survey should have Stps conducted throughout at 10 m (32 ft.) intervals along transects (Attach. 11). If a site is found then, Stps should be placed at 5 m (16 ft.) intervals in the cardinal directions to establish site integrity and delineation of the site. This advice was never taken, Stps were never conducted, yet buried A horizons (30 cm deep) and features have been found on the upper plateau within the LFTRC and within the Main Cantonment areas.
- c. Burials have been found in the Water Well Development, Design and Construction area between the LFTRC and the Main Cantonment area. Latte period burials are usually associate with Latte features. We also know that Latte Sets are most likely a part of a village complex rather than a single home. The survey of the Water Well Development area identified several interesting Caiguat Sites, one of which, is GHPI Site No. 66-08-2894. This site apparently runs 181 meters in along a straight Northeastward line before making a 90 degree turn toward the northwest running some 363 m before abruptly stopping. The site does not connect with the historic site that is approximately 11 m to the southeast.



On a previous visit to a portion of P-103 APE with Shawn Arnold, Cultural Recourse Manager for Joint Region Marianas and Richard Olmo, Andersen Air Force Base Archaeologist, our office concurred with monitoring of the APE for the wells. However, the APE changed and we believe that the new APE was not properly surveyed. Therefore, we have requested for a resurvey of the new APE with subsurface testing. The DoN believes that they have made a good faith effort in identifying historic properties with their pedestrian survey, which, I do not in agree with these findings.

- d. A quality control problem has existed and been brought up numerous times since 2010. On Dec. 7, 2015, I requested for some type of peer review before reports are sent to our office (Attach. 12). Ms. Antone noted in an email to me on July 12, 2017, that she was unable to find the review letters sent from our office to NAVFAC PAC (Attach. 13). These letters contain both our review comments and Guam Historic Property Inventory numbers issued for the sites. These correspondences also contained the comments on the reports from November of 2015 and May of 2016. The reporting has gotten to the point that we believed that the reports submitted are first drafts with little to no peer review. We asked again on July 25, 2017, that a Reviewer Page be attached to the document (Attach. 14). This way each individual who has reviewed the document could record the changes made to the report before it arrives at our office. The DoN has refused to make any such accountability list (Attach.15).

Hence, the points remain that the EIS and SEIS relied on work that is outdated and does not meet today standards. Some areas were never surveyed and some sites were never relocated due to the methodology employed. There was no systematic subsurface testing conducted even though it has been found that the original surface is 30 cm below present ground level, nor were sites fully identified. The historic contexts of the late 19<sup>th</sup> early 20<sup>th</sup> century were not fully considered in the surveys. The Follow-up or In-Fill surveys were inadequate and data recovery efforts were premature. MCAG has responded that these issues and items will be considered at a later date in their PA Memo's for concurrence. I find this unacceptable and will cause the loss of significant historic properties as this drags on. Ms. Claudia Nissley of the National Preservation Institute stated in a Section 106 training sessions that surveys conducted six to seven years ago should not be considered acceptable as a reasonable and good faith effort. This holds especially true if the archaeological knowledge and methodology has changed over time, which it has. This was the viewpoint was also express by the Advisory Council on Historic Preservation in our Section 106 training classes given in the past. The majority of the surveys conducted for these undertakings are based on surveys 10 to 30 years old with little to no subsurface testing. Our knowledge on Guam's the upper plateau has changed drastically in past few years as it has all over Guam. Ancient burials have now been found on the plateau that would be associated with homes, villages and possible long-term habitation sites.

Intact features and buried A horizons have turned up in areas previously bulldozed, either cover by mechanical or natural events, burials have been realized in shallow soils. Historic properties were

found by checking landscape against the historic maps. It is hard to believe that simplicity of archaeology has been overlooked during this multiyear process. I believe it has been mainly due to consequences of budgeted archaeological surveys, where the budget dictates the identification, evaluation and data recovery of archaeological sites and perhaps even structural sites on the landscape. Such work does not meet a reasonable and good faith effort to identify historic properties in my opinion. We have been currently told that the potential impact to construction schedules and "that work will progress in areas outside of the archaeological sites under review." This too is unacceptable (W. R. Lebeau to Ms. Lynda Bordallo Aguon, December 22, 2017 (Attach. 16)).

Therefore, I am suggesting a resurvey of the four Milcon Projects and any other areas with systematic subsurface testing. The areas that need resurveying are the LFTRC, the Main Cantonment, Andersen South and the Water Well Design, Development, Design and Construction areas. Some areas like the LFTRC, which underwent so-called "data recovered" still need further delineation of the sites and mitigation, this can also be said for the Main Cantonment area too. The Andersen South (Training Range) area needs to be resurveyed before any determinations can be made, the promise to take a look at areas that contain possible historic properties in the future after concurrence is given is impractical. These areas need to be resurveyed by today standards with systematic subsurface testing and perhaps monitoring during construction. This can also be said for the Water Well Development area for which we do not concur with the findings and do not believe that the area has been properly surveyed.

Based on the facts above it is my professional opinion, the Milcon's APEs and the new APE associated with the updated Water Well Design, Development and Construction need to be resurveyed with subsurface testing. The current APE for the Main Cantonment has changed since what I believe were premature data recovery efforts were contracted out. The APE now goes into areas that were never surveyed and are adjacent to areas surveyed 30 years ago. The surveyed areas are not up to current standards and show a basic disregard for buried horizons and features. The historical background of the areas was a brief overview that did not provide an in-depth look into the history of Guam and its people. The draft data recovery measures for Milcons J-001B and J-715 are less than an evaluation of the sites and should not be considered a data recovery effort. Therefore, I suggest that we request an opinion from the Advisory Council on Historic Preservation concerning the resurvey of these areas. It is my opinion that the DoN needs to cease any construction activities associated with Training Range Complex (LFTRC), (Milcon J-715), the Main Cantonment Areas (Milcon J-001B), South Andersen (Milcon J-755) and the Water Well Design, Development and Construction Areas (P-103) until an opinion is obtained and objections have been resolved.

Sincerely,



John Mark Joseph,  
State Archaeologist  
Guam Historic Resources Division  
Department of Parks and Recreation



John Mark Joseph &lt;johnmark.joseph@dpr.guam.gov&gt;

## Final Work Plan Review

Conte, Patricia J CIV NAVFAC Pacific, EV <patricia.conte@navy.mil>

Fri, Sep 5, 2014 at 1:06 PM

To: "Lynda B. Aguon" <lynda.aguon@dpr.guam.gov>

Cc: "West, Eric W CIV NAVFAC PAC" <eric.west@navy.mil>, "Ronnie.Rogers@fe.navy.mil" <Ronnie.Rogers@fe.navy.mil>, "Jennifer.Farley@fe.navy.mil" <Jennifer.Farley@fe.navy.mil>, "Manley, William R CIV NAVFAC HQ, ENV" <william.manley@navy.mil>, "Christine M. Olkeriil" <christine.olkeriil@dpr.guam.gov>, John Mark Joseph <johnmark.joseph@dpr.guam.gov>

Lynda,

Thank you for the response. Please see the attached comment matrix, which clarifies those comments that were addressed by the Contractor (and how) in preparation of the May 2013 work plan entitled " Archaeological Surveys and Cultural Resource Studies, Live Fire Training Range Complex NCTS Finegayan and Northwest Field Alternatives and Main Cantonment Alternatives, Territory of Guam."

Responses for those comments not addressed in the attached matrix are provided below.

1. Comment #1. We cannot find where our first comment was addressed in the Final Work Plan. In reviewing 3.1.2 Archaeological Testing, the purpose of the Shovel Test Pits (Stps) "is to expose sediment profiles so that depositional characteristics across the site can be documented ... " (Page 63, Paragraph 3, lines 1 and 2). This directly reflects our previous question as to why the sites were not tested.

DoD Response: The referenced methodology section of the work plan is a discussion of the general methods to be utilized if testing was undertaken at a given site within the potential direct impact area , not a statement or indication that all surface sites encountered in these areas would be tested. The in-fill studies were conducted in support of an SEIS utilizing one or more of the methods stipulated by 36 CFR 800.4 (b (1)). The purpose of these studies was simply to gather enough information to support the analysis of alternatives for purposes of the SEIS.

4. Comment #7 and Comment# 8. We found no changes or anything to address the Kurashina work. Our research has found that Kurashina did not address the comments provided by our office to complete the report. In our previous email correspondence with you, we provided you the site numbers for the corresponding sites provided in Kurashina's report, known as the Receivers Site.

DoD Response: The copy of the work plan delivered to you on August 18 is a replacement of the same one prepared in March of 2013. The figure provided in your email with the GHPI site numbers for the Kurashina report was not sent to us until a day after that, nor were they contained in your February 6, 2013 comments for the draft work plan. However, now that we have them, these site numbers will be reflected in the next iteration of the in-fill survey reports.

5. Comment #9. We found no change regarding the 23 year old unacceptable 30 meter reconnaissance survey in heavy vegetation by Highness and Haun. This type of work is unacceptable by today's standards for identifying historical properties.

DoD Response: As stated in the work plan and again within the in-fill survey reports currently under review, the objective of the in-fill surveys was to survey previously un-surveyed portions of the potential direct and indirect impact areas associated with the alternatives under analysis in the SEIS.

6. Comment #12. Admiral Nimitz Golf Course has been given a GHPI Number, it is Site No. 66-04-2758.

DoD Response: Thank you. We appreciate the very recent assignment of a GHPI site number for the Admiral Nimitz Golf Course. We will ensure this site number is reflected in the next iteration of the in-fill survey reports.

7. Comment# 13. The statement still stands that not all sites within the APE were disclosed or reviewed in the proper context. Given the context of the site above as a rural historic landscape on Guam, we tend to disagree with this statement; perhaps the area should be further assessed.

DoD Response: Your disagreement with the statement "There are no sites currently eligible for inclusion in the NRHP within the Barrigada Main Cantonment Alternative." in the work plan, which was prepared prior to the in-fill survey of Barrigada and well before the events that subsequently occurred at the Admiral Nimitz Golf Course is acknowledged.

This new information is captured on page 6-7 (lines 11 through 20) in the discussion of the Barrigada alternative within Volume I of the Direct Impact report currently under review by your office.

8. Comment #14. This statement still stands.

DoD Response: Your disagreement with the summary provided on page 44, Section 2.3.3 of the draft work plan "For the reasons listed from number 10 through number 15..." is acknowledged.

Regards,

Patty

Patty J. Conte, M.A.  
Archaeologist/Contract Officer's Representative  
NAVFAC Pacific Environmental Planning Branch, Code EV23

808-472-1432

-----Original Message-----

From: Lynda B. Aguon [mailto:lynda.aguon@dpr.guam.gov]

Sent: Thursday, September 04, 2014 3:30 PM

To: Conte, Patricia J CIV NAVFAC Pacific, EV

Cc: West, Eric W CIV NAVFAC PAC; Ronnie.Rogers@fe.navy.mil; Jennifer.Farley@fe.navy.mil; Manley, William R CIV NAVFAC HQ, ENV; Christine M. Olkeriil; John Mark Joseph

Subject: Final Work Plan Review

Hi Patty,

John finally reviewed the March 2013 Final Work Plan - his comments are attached. He wanted to complete this review before he continued on with the In Fill Tables.

You should have something on those Tables by next Monday, some if not all.

Thank you again for your patience.

Lynda

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Si Yu'os Ma'åse'.

Lynda Bordallo Aguon, MPA

State Historic Preservation Officer

Guam Historic Resources Division

(State Historic Preservation Office)

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[www.historicguam.org](http://www.historicguam.org) <<http://www.historicguam.org/>>

[Quoted text hidden]

**2 attachments**

 **GHPO\_Comment\_Matrix\_Mod\_2\_WP.pdf**  
161K

 **smime.p7s**  
6K



Eddie Baza Calvo  
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Ray Tenorio  
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## Department of Parks and Recreation

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Raymond F.Y. Blas  
Director

In reply refer to:  
RC2013-0853

July 2, 2014

Karen Sumida  
Business Line Manager,  
Environmental  
Naval Facilities Engineering Command Pacific  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134

Subject: Part I Partial Review of: Proposed Guam and CNMI Military Relocation 2012 Roadmap Adjustments SEIS, Live-Fire Training Range Complex Range Footprints, Main Cantonment, Utilities, Communications, Well Field Alternatives and Access Route Options  
*Volume I: Potential Direct Impact Area In-Fill Cultural Resources Study Narrative*  
*Volume II: Potential Direct Impact Area Guam Historic Properties Inventory Data Forms, Part 1, and Part 2*  
*Volume III: Potential Direct and Indirect Impact Area Cultural Resources Study Synthesis*

Dear Ms. Sumida,

Provided for your review are comments on the subject matter. Considering the enormity of the reports we received from your office, only a partial review was completed at this time, in order to meet the July 2, 2014 deadline. The State Archaeologist is working diligently to review all of what was submitted to us but will need an extension to accomplish this.

Here are the comments:

Portions of this study were not completed until after our first review. In the future, please provide a detailed letter labeling each change to the In-Fill Cultural Resource Studies. The letter should address all comments and any additional text added to the studies. The revised subject determinations should have been all inclusive in the discussion to make a full determination without further review, without flipping back and forth among the volumes to get a full picture of the respective site and the survey involved.

The GHPI data forms should be an appendix and should be produced after the sites have been concurred on by our office. An updated form can be found on our website. Completed forms must not contain footers or binder holes. A copy of the GIS files for these sites that were located, would certainly help us in the review process. The shovel test pits (Stps) used to identify the boundaries of sites does not necessarily provide information on the integrity of sites, only the extent of the site. Please provide tabs separating the different sections Andersen Air Force Base survey, rather bunching them together.

The site descriptions are cut and pasted into the GHPI Data Forms. There are no associations made with known features on the landscape from historic maps except for a few exceptions. This is especially true for historic roads and trails traversing the area. An overall view needs to be considered where one can view different features and sites, within a map, to assess possible defensive positions throughout the area, and to see if there is any correlation to a defensive front or just randomly scattered individual units. The study lacks continuity in presenting an overall picture of what happened on the landscape, this is especially true of the AAFB Well Development Area, which this Part I Review focuses on. In this area, lines of possible fox holes and defensive positions are not present to provide an overall possible defensive position representing the last days of the conflict on Guam but are seen as individual actions, which may not be further from the truth. The historic contexts used in some descriptions do not match the GHPI Data Form or even the ones marked on the form. The GHPI Data Form has been revised before some of the studies in the SEIS were conducted.

In the tables, the "Subsurface Tested" is misleading. The sites were not tested for integrity, the sites were tested to define the boundaries of the site. The majority of the sites had no Stps placed inside the site, therefore, you cannot say that the site was tested only that the boundaries or possible boundaries were subsurface tested, which would most likely produce negative results. Many of the Stps in the study do not meet the minimal size for Stps as outlined in 2.2.1.4 Archaeological testing, (i.e. T-WAW-026, S1 and N1 or T-WAW-027, W1). Some Stps slant inwards at the bottom decreasing the volume of area tested for defining the site.

#### Volume I: Potential Direct Impact Area:

In the Literature Review and other sections, please distinguish between the archaeological technicians and the archaeologists. On line 19, Page 2-4, correct the five 20-m (68-ft) segment in one meter rod. The depths of stratigraphic changes within the Stps need to be included in the soil descriptions. Site 66-08-2714 (T-WAW-016) indicates that it's a multiple component period site, however, Table 4-42 only reflects a bottle scatter for the "Site Type" and does not indicate the Latte period finds, this needs to be corrected. All of the sites below do not have maps, only one photograph of the site, and the documentation on determination needs to be complete. We set up a table for GHPI site number and eligibility and concurrence.

#### AAFB Well Development Area

T-WAW-001: There is no photographic documentation of the 50% or less visibility of the area, transect cuts through the area, or survey record. There are no photographs of the features or drawings documenting Site T-WAW-001 with the determination. There is no explanation for the "Not in Survey Area" in the middle of the site and survey area. There is no explanation of the large feature shown in Figure 4-136, or if this feature was tested in the survey and why it was not included in the site. The historic background research conducted on the area should have indicated these sites prior to the survey, and the features noted in Figure 4-136 should have been targeted as well as areas outside of their potential impact. The historic background presented is minimal, the legend of the map provided in Figure 4-136 should shed information on the function of this complex. While Features A, B and C were indeterminate considering corresponding to the 1949 map, were they compared with the 1954 map which provides a different configuration of building in the survey area?

T-WAW-002: Page 4-208, Line 7 and Table 4-44 indicate different amounts of slipped pottery; please provide accurate numbers and indicate where the mix-up was made in the write up letter. Table 4-45 indicates the end of excavation (EoE) and the depth of the pottery sherds found, however, it does not indicate the depth of the stratigraphic change. S3 indicates 2 shards at 25 cm below surface and 30 cm below surface, as the text is different from the previous set text, we, therefore are interpreting S3 as having four shards total. Was this stratified or could it be identified at this stage? What percentage of the site was 80% visibility and what percentage was 10% visibility? The stps shows that the site had deposition to 40 cm in some locations, though, no excavation unit was executed to examine for features within the site. There is no photographic documentation of the site, Stps or mapping of the site included with the description. In reviewing a site, one should not have to refer to the GHPI Data Form to retrieve the information on the site - the determination should provide stand-alone information on the site to make a decision. This can be said for all sites.

T-WAW-003: There is a difference in text and Table 4-42 concerning period of the site, please resolve. There needs to be more photo-documentation of the 17.5 hectares (43.3 acres) site, perhaps a Lidar map can help provide better clarification of what areas have been totally quarried and what areas were not. Also, provide an explanation why site 66-08-2705 is approximately 4/10ths of a mile southeast of 66-08-2704 and 4/10 of a mile northeast of 66-08-2706 as the numbers are not corresponding to the survey area. The historic debris or dump site needs to be separated from the quarry site and given its own site number as no association has been made with the quarry.

T-WAW-004: We cannot concur with the finding of eligibility for this site at this time. There is no historic background research conducted on the supposed jeep trail. The 1913-14 map shows a trail in this area, one also shows up on the 1994 map in the area. This trail may go further back in history, however, we will leave that up to your research.

T-WAW-005: We can concur with the finding of eligibility for this site, however, a map of the site needs to be included in the write up, and the Data Form updated.

In reviewing the work completed in this area the following sites, T-WAW-002, T-WAW-006, T-WAW-007, T-WAW-008, T-WAW-009, T-WAW-025, T-90-2 and T-90-3 have been combined into an agricultural complex and given the GHP Number 66-08-2707. The site may well extend eastward to the approximate extent of the *lusong* and artifact scatter noted by Yee & et al in the *Archaeological Overview Survey Report for Andersen Air Force Base, Guam, November 2004*. We have established an arbitrary line along the southeastern boundary starting at 269315.E, 1503923.N eastward to 270925 E, 1504616. N.

The site is defined as having three major features. We believe these areas may depict different horticultural practices perhaps due to possible pressure changes in Chamorro society. Each of these work areas need to be looked at as whole, and each *lusong*, *latte* set, burial and rock mound needs to be considered a separate feature within the site. These features cannot be separated from one another or the whole. Each feature is an integral part of the site and needs to be investigated holistically. Clearly, there are work areas dedicated to processing food reflecting the ecological and nutritional practices of the ancient Chamorro people. A comprehensive study of the rock mounds needs to be conducted throughout the area, the explanation of these piles being produced from the clearing of planting fields is not consistent with known food collection practices of the ancient Chamorro. Do these rock alignments identify cultural adaptation patterns of horticultural practices? Are they *latte* period or related to World War II defensive positions?



There is no clear explanation why the survey stopped in several areas, one west of T-WAW-009 and the other just south and to the west of T-WAW-009 and another to the north. This needs to be explained in the text. We find this site eligible for the listing in the NRHP.

Sites T-WAW-010, and T-WAW-011 have been given numbers below in Table 1, and we concur that these sites are not eligible for listing in the NRHP. However, in the final reporting please provide a sufficient map and recordation of the sites in the write up for each site.

T-WAW-012, there was no testing near the feature and it is unclear what is meant by "Tall Limestone." The description that there was only 15% visibility in the area makes it near impossible to make an evaluation on the site due to erosion and fallen vegetation. The site needs to be tested along with both the northern and southern sections of the site. Also, there is no picture depicting the "Tall Limestone" which impeded the shovel testing of the western border of the site.

Site T-WAW-013 description and the GHPI Data Form does not provide adequate documentation for the deposition of the prehistoric site, nor does it provide enough evidence for the historic part of the site. If indeed the foundation is the cap of the privy belonging to a pre-war *lancho*, there should be some evidence of the *lancho* in close proximity to the outhouse. Also, there was no testing of the privy hole at all and find no record of the depth of the privy recorded. Stps should have been conducted along the landform (northward) for evidence of the *lancho*. Stps were only conducted in limited fashion to identify those existing in the prehistoric site. Furthermore, there are 90 meters between the two *latte* period pottery scatters, testing was not conducted internally to examine the site's integrity, only a visual perspective was provided for the opinion given. Therefore, we cannot concur with your determination at this time. Further testing both inside and outside is needed before any concurrence.

Site T-WAW-014 description and the GHPI Data Form does not provide adequate documentation of either the prehistoric or history portion of the site. There was no internal testing of the site, only the identification of the site. What function did the rock alignments and rock mounds serve in prehistoric times or are they part of the Japanese Military Occupation or Post WWII / Second American Territorial Period? Sufficient evidence has not been thoroughly presented to identify the sites to concur with the determination at this time.

Site T-WAW-015 description and testing shown in the GHPI Data Form begs the question - since Stp W2 was positive, why was the line not continued along the same direction that produced a positive Stp rather than switching direction? Once a positive Stp had been established, then Stps should have radiated from that point to further investigate the site. The pig wallow feature was not located on the map to provide a perspective of it on the landscape. We feel that further testing of this area should have been conducted, especially, along the line to the southeast from the positive Stp, along with locating the pig wallow on the map and at least some more tests within the site.

Site T-WAW-016, Table 4-80 has Latte period and WWII period features listed together, these should be separated, especially when discussing the site. The discussion portion only provides a couple of descriptions of the features, such as bottle scatters, but fails to explain the depression, ditch, or the buried barrels or if they are associated together, perhaps in making a WWII defensive position. The Latte period features should also be discussed in relation to one another. What is the percentage of 10% visibility

compared to the 80% visibility? Feature A is not represented on T-WAW-016 overview, and there is no sketch of Features A, D, etc., there is no explanation of why some of the rock alignments are considered Latte period and some WWII period, these need to be carefully explained in further context of the site. The road associated with Feature P is not listed as a feature, why not? What constitutes all the features to be combined into one site and not multiple sites? These features need to be discussed in context with those sites listed in the *Archaeological Overview Survey Report for Andersen Air Force Base, Guam* by Yee, Welch and Allen, 2004, including those previously known in the area. We cannot concur with the determination as the documentation is vague and information needed is absent.

Site T-WAW-017, Table 4-42, indicates that the site has Latte period artifacts, however, the GHPI Data Form listed the site as historic. The two dirt roads in the description are not described as features on the landscape, until one views the map in GHPI Data Form. Figure 2.5 does not portray T-WAW-021 crossing anywhere near T-WAW-017. This is a major documentation error that needs to be corrected. The visibility of the site was 10 to 40%, we believe that the prehistoric aspect of this site was inadequately identified or examined due to such low surface visibility. Therefore, we cannot concur with the determination and ask that more testing be done on this site, especially, regarding the Latte period artifacts. Feature C is also constricted by the Survey Boundary and the map does not identify sites beyond the survey boundary which may be associated with this site, nor does it refer to this in the text. The amount of Stps for this site does not correspond to the listed methodology of two negative Stps in defining the boundaries of a site. Stps were not even placed to the north or south of the site, much less, inside the site to test for integrity.

Site T-WAW-018 needs to be further evaluated, the description data does not match the data presented in the GHPI Data Form. The pits found here need to be looked at holistically with other defensive positions and the accounts of the battles to see if a defensive battle position can be established. The "old" road needs to be labeled as a feature and followed out - perhaps it could have its own site number. It is unclear what is connecting Feature A and B - is this a road or just an arbitrary line? This needs to be explained in the text. Is the Latte period pottery associated with T-WAW-013? We cannot concur at this time with the determination, however, we have assigned the number to reflect the bottle scatters. The foxholes may need their own site number once these have been re-examined as a whole.

Site T-WAW-019, the opening description does not mention the Latte period nor is it listed in Table 4-42, or on the GHPI Data Form - the data is insufficient and needs to be corrected; however, we can concur that this site is eligible for listing in the NRHP, although the site boundaries may need to be increased along the northeast side as no Stps were conducted in the cardinal directions from the Latte period portion of the site.

Site T-WAW-020 we concur with the eligibility of the site for listing in the NRHP, however the site located on the topographical map does not mirror the site map - this needs to be corrected.

Site T-WAW-021, Figure 4-158 should have an arrow pointing to the site for quick identification of the site. Here, the Latte period was totally ignored as an independent site, which should have been tested as such. The Quarry being a historic site has no bearing on the prehistoric component of the site except to be the cause of the destruction of a portion of the prehistoric site. We cannot concur on this site as we have not enough information concerning the Latte period portion of this site. However, since the Latte Period site may be outside of the Quarry area, then a new site number should be requested for this site once it is fully identified. Other areas around the quarry were not shovel tested but should be since Latte period pottery has been found in close proximity of the site.

T-WAW-022 is missing from Table 4-42 and the site files. However, after assigning numbers in sequence to the areas study we found T-WAW-022 in the back of the AAFB Well Development Area along with the GHPI Data Form also being out of sequence. The breaking in sequence for this single architectural building should have been mentioned in the opening text on page 4-199. The building is part of a complex of buildings, however, it was not analyzed as a complex. The building may be an integral component of the compound, which may or may not affect the integrity of the group as a whole. There is no information that the area was archaeologically investigated. We have assigned a GHPI Site Number - however, the site must include the whole, not just the building, even though the building may be the only part within your area of potential effect (APE).

At Site T-WAW-023 subsurface metal was detected, which may or may not have been unexploded ordinance. This statement reflects that there may be a separate component to the site, perhaps a WWII battle site, which is unknown at this time, We cannot concur on the eligibility since the site has not been fully identified.

Site T-WAW-024 contains underground cavities that have not been explored or explained in this report, therefore, we cannot concur on the eligibility until further work is completed.

Site T-WAW-026 although the maps and photos of the sites need to be with the description and determination of the site we can concur on eligibility. Please make the correction in the next draft.

Site T-WAW-027 although the maps and photos of the sites need to be with the description and determination of the site we can concur on the eligibility. Please make the correction in the next draft.

Table V-1 is below which provides comments and our opinion on eligibility for the above sites. We feel that much work needs to be done in many areas as the sites were just identified and the Stps were to identify the limits of the sites and not to investigate the integrity of the sites

Table 1: AAFB Development Area

<b>GHPI Site Number</b>	<b>Temporary Site Number</b>	<b>Period (Historic Context) and Site Type</b>	<b>NAVFAC NRHP Eligible</b>	<b>SHPO Concurrence on NR Eligibility</b>
66-08-2703	T-WAW-001	Post WWII / Second American Territorial Period	Not Eligible	Do Not Concur at this time. Further Documentation Required
66-08-2704	T-WAW-003	Present, Organic Act / Home Rule / Economic Development Period	Not Eligible	Do Not Concur at this time. Further Documentation Required.
66-08-2705	T-WAW-004	Post WWII / Second American Territorial Period	Not Eligible	Do Not Concur at this time. Further Documentation Required
66-08-2706	T-WAW-005	Latte	Not Eligible	Concur

<b>GHPI Site Number</b>	<b>Temporary Site Number</b>	<b>Period (Historic Context) and Site Type</b>	<b>NAVFAC NRHP Eligible</b>	<b>SHPO Concurrence</b>
66-08-2707				
66-08-2707	T-WAW-002	Latte	Not Eligible	Do Not Concur
66-08-2707	T-WAW-006	Latte	Eligible	Concur
66-08-2707	T-WAW-007	Latte	Eligible	Concur
66-08-2707	T-WAW-008	Latte	Not Eligible	Do Not Concur
66-08-2707	T-WAW-009	Latte	Not Eligible	Do Not Concur
66-08-2707	T-WAW-025	Latte -- Artifact Scatter	Not Eligible	Do Not Concur
66-08-2707	T-90-2	Latte -- Artifact Scatter	Eligible	Concur
66-08-2707	T-90-3	Latte -- Artifact Scatter	Eligible	Concur
66-08-2708	T-WAW-010	Latte	Not Eligible	Concur
66-08-2709	T-WAW-011	Latte	Not Eligible	Concur
66-08-2710	T-WAW-012	Latte	Not Eligible	Do Not Concur at this time. Further Documentation Required
66-08-2711	T-WAW-013	Latte and First American Territorial Period --Pottery Scatter (?)	Not Eligible	Do Not Concur at this time. Further Documentation Required
66-08-2712	T-WAW-014	Latte, World War II - Japanese Military Occupation and Post WWII / Second American Territorial Period - Rock Alignment /Rock Mound / Foxholes	Not Eligible	Do Not Concur at this time. Further Documentation Required
66-08-2713	T-WAW-015	Latte -- Pottery Scatter	Not Eligible	Do Not Concur at this time. Further Documentation Required
66-08-2714	T-WAW-016	Latte, World War II - Japanese Military Occupation and Post WWII / Second American Territorial Period -- Bottle Scatter	Not Eligible	Do Not Concur at this time. Further Documentation Required
66-08-2715	T-WAW-017	Latte and Post WWII/ Second American Territorial Period -- Military Dump	Not Eligible	Do Not Concur at this time. Further Documentation Required

<b>GHPI Site Number</b>	<b>Temporary Site Number</b>	<b>Period (Historic Context) and Site Type</b>	<b>NAVFAC NRHP Eligible</b>	<b>SHPO Concurrence</b>
66-08-2716	T-WAW-018	World War II - Japanese Military Occupation and Post WWII / Second American Territorial Period – Pit/Foxhole features and bottle scatter	Not Eligible	Do Not Concur at this time. Further Documentation Required
66-08-2717	T-WAW-019	First American Territorial Period and Post WWII/ Second American Territorial Period - Homestead	Eligible	Concur, Needs some work in description, tables and GHPI Data Forms
66-08-2718	T-WAW-020	Latte and Present, Organic Act / Home Rule / Economic Development Period – Artifact Scatter	Eligible	Concur, but further work is needed.
66-08-2719	T-WAW-021	Post WWII/ Second American Territorial Period and Present, Organic Act / Home Rule / Economic Development Period - Quarry	Not Eligible	Do Not Concur at this time. Further Documentation Required
66-08-2720	T-WAW-023	Present, Organic Act / Home Rule / Economic Development Period – Concrete Foundations	Not Eligible	Do Not Concur at this time. Further Documentation is needed.
66-08-2721	T-WAW-024	Present, Organic Act / Home Rule / Economic Development Period – Concrete Foundations	Not Eligible	Do Not Concur at this time. Further Documentation Required
66-08-2722	T-WAW-026	Present, Organic Act / Home Rule / Economic Development Period – Concrete Foundations	Not Eligible	Concur
66-08-2723	T-WAW-027	Latte –Pottery Scatter	Not Eligible	Concur
66-08-2724	T-WAW-022	Guam Observation Building	Not Eligible	Do Not Concur at this time. Further Documentation Required

Volume III Potential Direct and Indirect Impact Area Cultural Resources Study Synthesis

Page 1, lines 24 to 28, describes that each Architectural property within the potential direct impact areas were recorded and evaluated using the National Register of Historic Places (NRHP) criteria. However, Table 2-2 directly indicates that Known Architectural properties within the potential “Direct” impact areas were not evaluated. At least one structure was not even identified or evaluated - under the “NRHP criteria”

section in Table 2-2, please clarify the "Covered under Program Comment" - this should be specific to the document.

In Welch 2010, *Final Archaeological Surveys and Cultural Resources Studies on the Island of Guam in Support of the Joint Guam Build-Up Environmental Impact Statement, Volume 1*, shows areas of high and medium potential within the APE. The medium potential area was surveyed in 2009 by Athens, however, the conclusions were not reported in the 2010 report. The recent finding on the upper plateau at Andersen Air Force Base indicates that even heavily disturbed areas may contain in-situ deposits or burials. Athens reports that no subsurface testing was conducted in the survey, although, Welch recommended that subsurface testing and or monitoring of the area based on the 2007 reporting. Athens photographs of the area shows that they did not even consider or report the road (a visible feature on the landscape) in their reporting. Haun's 1988 reconnaissance survey also shows two area of high probability within the APE according to our research.

Therefore, we cannot concur with the findings for 66-08-2293, 66-08-2294, 66-08-2295, 66-08-2296, and 66-08-2297, these are areas of concern that needs to be addressed. Furthermore, 66-08-2293 intersects and overlaps the Encampment 66-08-2305, which is marked eligible on Table 2-1. The Pre-Contact site 66-08-2309 is listed as "Not Eligible" on Figure 2-2 or a good portion of the site is "Not Eligible", however it is "Eligible" in Table 2-1 and does not distinguish any portion of the site being "Not Eligible". We believe that the entire site is "Eligible" according to the prior studies conducted, the map needs to be changed to reflect the entire site. In recording the period for sites please refer to and use our Historic Context in our Guam Historic Properties Inventory Data Forms.

For Table 2-1, we can concur with the following:

<b>GHPI Site Number</b>	<b>Period (Historic Context) and Site Type</b>	<b>NHPR Eligible</b>	<b>NRHP Criteria</b>
66-08-1350	First American Territorial Water Catchment Structure	Yes	D
66-08-2299	Pre-Contact Latte and Post WWII/ Second American Territorial Period Concrete Structure and Artifact Scatter	Yes	D
66-08-2300	First American Territorial Defensive Structures	Yes	D
66-08-2301	Pre-Contact/Latte Period	Yes	D
66-08-2302	Post WWII/Second American Territorial Period Encampment	No	NA
66-08-2303	Pre-Contact/Latte Period Habitation Site and Artifact Scatter	Yes	D

<b>GHPI Site Number</b>	<b>Period (Historic Context) and Site Type</b>	<b>NHPR Eligible</b>	<b>NRHP Criteria</b>
66-08-2304	Post WWII/Second American Territorial Period Encampment	No	NA
66-08-2306	Post WWII/Second American Territorial Period Encampment	Yes	D
66-08-2307	Pre-Contact Latte Period	Yes	D
66-08-2308	Pre-Contact Latte Period	Yes	D
66-08-2309	Pre-Contact Latte Period	Yes	D
66-08-2551	Post WWII/Second Administration Territory Period, Farmstead	Yes	D
66-08-2552	Pre Latte Artifact Scatter	Yes	D

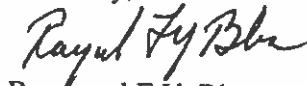
We have assigned GHPI Site Number 66-08-2701 to T-1/378\* listed in the 1988 Haun report and assigned GHPI Site Number 66-08-2701 to T-2 in the same report. We will be assessing and possibly assigning GHPI Site Numbers to the other sites found in this report as they were unaltered.


The legend of Figure 2-4 Shows Church et al. 2009 in green, however according to Volume I Figure 4-6, Church looks to abut Dixon et al. and not impede the In-Fill Survey Area. The legend of Figure 2-5 is covering part of the Eligible site to where it cannot be viewed, the legend should not be blocking the focus of the study.

We look forward to your comments on this partial review. In light of it's incompleteness, we are requesting an extension of 90 days to complete all of the volumes.

Should you have any questions please contact our office.

Sincerely,

  
Raymond F. Y. Blas  
Director

  
Lynda Bordallo Aguon  
State Historic Preservation Officer



John Mark Joseph &lt;johnmark.joseph@dpr.guam.gov&gt;

**J001-B Impact Area Response**

5 messages

John Mark Joseph <johnmark.joseph@dpr.guam.gov>  
 To: "Carly Antone (carly.antone@navy.mil)" <carly.antone@navy.mil>  
 Cc: "Arnold, Shawn W CIV NAVFAC PAC, EV" <shawn.w.arnold@navy.mil>

Tue, Aug 4, 2015 at 1:58 PM

Dear Carly,

Attached is the response to your J001-B Impact Area

Gracias,

John Mark Joseph  
 State Archaeologist, Guam  
 490 Chalan Palasyo  
 Agana Heights, GU 96910  
 (671)-475-6339  
 JohnMark.Joseph@dpr.guam.gov

 **Response to J-001B Impact Area for SHPO.docx**  
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Antone, Carly R CIV NAVFAC PAC, EV <carly.antone@navy.mil>  
 To: John Mark Joseph <johnmark.joseph@dpr.guam.gov>  
 Cc: "Arnold, Shawn W CIV NAVFAC PAC, EV" <shawn.w.arnold@navy.mil>, "Ronnie Rogers (ronnie.rogers@fe.navy.mil)" <ronnie.rogers@fe.navy.mil>

Wed, Aug 5, 2015 at 2:02 AM

Aloha Mr. Joseph,

The figure referred to as Attachment 1 was not included. Please resend at your convenience. Thank you.

Respectfully,  
Carly

Carly R. Antone  
 Archaeologist  
 Naval Facilities Engineering Command, Pacific  
 258 Makalapa Drive, Suite 100  
 Pearl Harbor, HI 96860-3134  
 Desk: (808) 472-1464

[Quoted text hidden]

 **smime.p7s**  
 6K

John Mark Joseph <johnmark.joseph@dpr.guam.gov>  
 To: "Antone, Carly R CIV NAVFAC PAC, EV" <carly.antone@navy.mil>  
 Cc: "Arnold, Shawn W CIV NAVFAC PAC, EV" <shawn.w.arnold@navy.mil>, "Ronnie Rogers (ronnie.rogers@fe.navy.mil)" <ronnie.rogers@fe.navy.mil>

Wed, Aug 5, 2015 at 8:15 AM

Hafa Adai Ms. Antone,

Please disregard the document, attached is the document with the attachment. I am a bit under the weather this morning and will be going home shortly. If there are any questions, I should be in first thing in the morning.



July 30, 2015 Subject: Response to: J-001B Impact Area.

Dear Ms. Antone:

In reviewing your subject letter concerning Site 378, we found a mistake in our March 31, 2015 letter. GHPI numbers for T-1 and T-2 sites (Haun 1988) were issued in our July 2, 2014 review; Part I Review of: *Revised Draft In-Fill Cultural Resources Reports for Live Fire Training Range Complex (LFTRC) and Main Cantonment Alternatives to Support Roadmap Adjustments 2012, Supplemental Environmental Impact Statement (SEIS) Volumes I and II and Draft Proposed Guam and CNMI Military Relocation 2012 Roadmap Adjustments SEIS Live Fire Training Range Complex Surface Danger Zones (SDZs) In-Fill Cultural Resource Studies Volumes I and II.*

In March 2015, we mistakenly issued new numbers for Haun's T1 and T2 sites. Since, these sites had been previously issued GHPI numbers the year before (2014) we need to retract the March 2015 GHPI numbers (66-08-2797 and 66-08-2798). The other GHPI numbers issued for Haun's remaining sites are correct and were not duplicated.

PHRI Temporary Site Numbers	GHPI Numbers Issued July 2, 2014	Welch. 2010 MapNo	GHPI numbers mistakenly issued for T-1 & T-2, March 2015	National Register Eligibility
T-1	66-08-2701	378	66-08-2797	Yes
T-2	66-08-2702	379	66-08-2798	Yes
T-6	No Number Issued	380 Isolated Find.		No

We've noticed that only a portion of the July 2, 2014 GHPI numbers issued were utilized as the GHPI number used for T-2 is from the March 2015 letter. Haun's 1988 report indicates T-3 and T7, GHPI numbers 66-08-2799 and 66-08-2802 are also eligible for listing in the National Register of Historic Places (NRHP). These sites require additional research and mitigation or preservation; however, they are not within J-001B area of potential effect (APE).

PHRI (Haun 1988) Temporary Site Numbers	GHPI Numbers	National Register Eligibility
T-3	66-08-2799	Yes
T-7	66-08-2802	Yes

The only other site within the J-001B impact area APE is GHPI number 66-08-2310. This is a large dense Latte period site eligible for listing on the NRHP (See Attachment 1).

In your letter there is a reference to Kaschko 2009, however, we find no Guam synthesis by Kaschko 2009 in our records. Please provide us with a copy of the document. Welch et al. conducted a Cultural Resources Synthesis in 2009, however, Kaschko was not one of the authors.

In reviewing GHPI numbered site 66-08-2701 (MapNo 378) and georeferencing the associated maps we noticed discrepancies in other site locations. GHPI numbers were issued for Kurashina's 1987 survey and georeferenced; the Haun 1988 survey did not cover the same area as Kurashina, though Haun "roughly" estimated the locations of Kurashina's sites, providing misinformation on the location of these sites. Welch et al. 2009 *Cultural Resources Synthesis For Comnavreg Marianas Lands, Guam* copied Haun's 1988 misplaced sites rather than using the original source (Kurashina 1987) to georeferenced these sites further compounding the mistake. GHPI numbers 66-08-2701 and 66-08-2702 from Haun's 1988 study are correct, however, those outside of Haun's 1988 survey area are incorrect and misplaced on the landscape. We have synthesized Kurashina's, Haun's and Welch's maps for you (See attachment 1).

In reading Welch's 2010, Vol. I, GHPI numbered sites 66-08-2701 and 66-08-2702 were never found. These sites could have easily been missed because of the conditions described on pages 143 and 144 or due to the use of the Garmin GPS units, which could easily be inaccurate up to 30 meters or more in the field. The Welch document also changed the designation of the significant sites to not eligible. We are glad that you recognized the GHPI numbered site 66-08-2701 is eligibility for listing in NRHP. We would like to note that GHPI numbered site 66-08-2702 is also eligible under criteria D, although not located in the J001B APE.

GHPI number 66-08-2806 was issued for MapNo 381 located by Haun in 1989 and noted by Welch 2010, Vol. II, although no further work is necessary at this site, the site is in proximity to GHPI Numbered sites 66-08-2298 and 66-08-2297 that are eligible.

Should you have any questions please do not hesitate to contact our office.

John M. Joseph, State Archaeologist



Eddie Baza Calvo  
Governor

Ray Tenorio  
Lt. Governor

## Department of Parks and Recreation

Government of Guam  
490 Chalan Palasyo  
Agana Heights, Guam 96910  
Director's Office: (671) 475-6296/7  
Facsimile: (671) 477-0997  
Parks Division: (671) 475-6288/9

Guam Historic Resources Division: (671) 475-6295/6270

ATTACHMENT 4 (6 pgs.)



Raymond F. Y. Blas  
Director

In reply refer to:  
RC2014-0625

January 23, 2015

Ms. Carly Antone  
Environmental Planning Product Line  
NAVFAC Pacific, Code EV23  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134

Subject: Review of PA Memo #2, December 9, 2014  
Project: J-001B Utilities and Site Improvements, Navy Base Guam Telecommunications Site

Dear Ms. Antone:

We have reassigned Guam Historic Properties Inventory (GHPI) Site Numbers 66-04-2303 *Adacao Latte Quarry Site* to the *Magua Settlement Site*. The reassignment reflects the site found and listed in David Welch's June 2010 report as described on Page 150 and shown on Page 180. However, the site shown on Page 180 is not complete and lacks two features described in Table 8.4. The site map must be submitted to our office in its entirety before any resolution of adverse effects can be considered, although the site may need to be resurveyed to locate these features. No shapefiles of the sites and area of potential effect (APE) were provided with the PA Memo. The APE of the *Magua Settlement Site* has transformed from a minimum impact to the total destruction of the entire village complex along with three quarry sites. As there is ample room of avoidance in project areas, we feel that this project should be redesigned to avoid this site altogether, once totally defined. If the site can't be avoided, then further mitigation beyond the Standard Operating Procedures (SOP) will need to be presented before this project can be considered. The project as proposed in the 2011 PA was avoidance and minimum impacts not total destruction of cultural resources in this area.

In reviewing the Welch 2010 report, and the other surveys listed in the PA Memo J-001B, the actual survey area does not cover the entire APE listed in Figure 1. The archival survey may have sufficed for the 2011 APE with its minimum impact, but this is not sufficient for the 2014 APE presented in the J-001B PA Memo. Welch's 2010 report also indicates that "field team was **not able to cover two areas** during the time allotted for the survey" (143, Vol.I), however, he **does** not indicate where these areas are located and the size of these areas. This is also compounded by Hiro Kurashina's survey with **transects varying between 90 and 180 feet**. We have marked a map Attachment 1, indicating the areas not previously surveyed during the 2010 report that need to be surveyed by boots on the ground. These areas are colored in black and marked with + symbols. The survey should also include systematic subsurface testing. The testing may provide more information and possibly expand the boundaries of sites 66-08-2303 and 66-08-2302 since the un-surveyed areas about these sites.

Contrary to the narrative provided in Welch's 2010 Volume I, concerning Site 66-08-2303, "The *haligi* and

*tasa latte*.... at this unique site are no longer in situ, that is, they are not embedded in the soil in their original arrangement in which they would have supported a house structure” (p. 147). The *haligi* in the photograph is shown in situ and embedded in the soil in Volume II, where other *haligi* and *tasa latte* elements look to have fallen in place.

In further review there is no prehistoric aspect presented in this PA Memo of Site 66-08-2302. This prehistoric aspect is also absent from Volume 1 of Welch’s 2010 report, although it is clearly indicated in Volume II. An expansion on the prehistoric component described in Volume II may provide an association between Site 66-08-2302 and Map No. 1024, even though Map No. 1024 is from a disturbed context. The statement; “the eligibility of the artifact scatters is difficult to evaluate as little excavation was done during this Phase I survey” (165, Welch 2010), may explain the disconnection with reporting the prehistoric aspect of Site 66-08-2302 and any connection to the *lusong* (Map No. 1024) in the report.

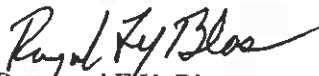
In reviewing the MILCON P101 project, this site is nowhere near the APE for Site 66-08-2305 or the PA Memo J001B project. Our records show no mitigation has been completed or that the Guam Historic Property Inventory (GHPI) Data Form was submitted to our office for this site. There are many unanswered questions concerning this site, such as: was Feature 6, the Spanish Oven connected with a ranch in the area, if so where?; was the defensive position connected to a larger defensive action which goes beyond the boundary of the APE by the Japanese?; does Feature 15 have any prehistoric context? Note that Feature 17 goes beyond the boundary of the site, therefore the site boundaries need to be enlarged to accommodate the feature.


Welch indicates in Volume II that Site 66-08-2307 was a prehistoric site, though the age of the site is indicated as “historical” – please provide an explanation for this discrepancy. This is similar to 66-08-2308, however, it is listed as both a prehistoric and historic site, though there is no explanation of the historic site in the description, just “near historically disturbed area” (Welch 2010, Vol. II, p. 98). Site 66-08-2309 is also listed as a prehistoric site, but historic in age.

In reviewing the historical maps of the APE, we identified a farm site not located during Welch’s 2010 survey that survived for 40 years on the historical maps. This site appears on three historical maps, the 1913-14, the 1944 and the 1954 maps circled in red (Attachments 2, 3, and 4). We find no discussion of this site in the Welch’s 2010 report in the background research, or why it wasn’t located on the landscape. The site being historical in nature should be easily identifiable due to its age and associated trash dumps. This site could also be a part of the *Magua* Coconut Plantation.

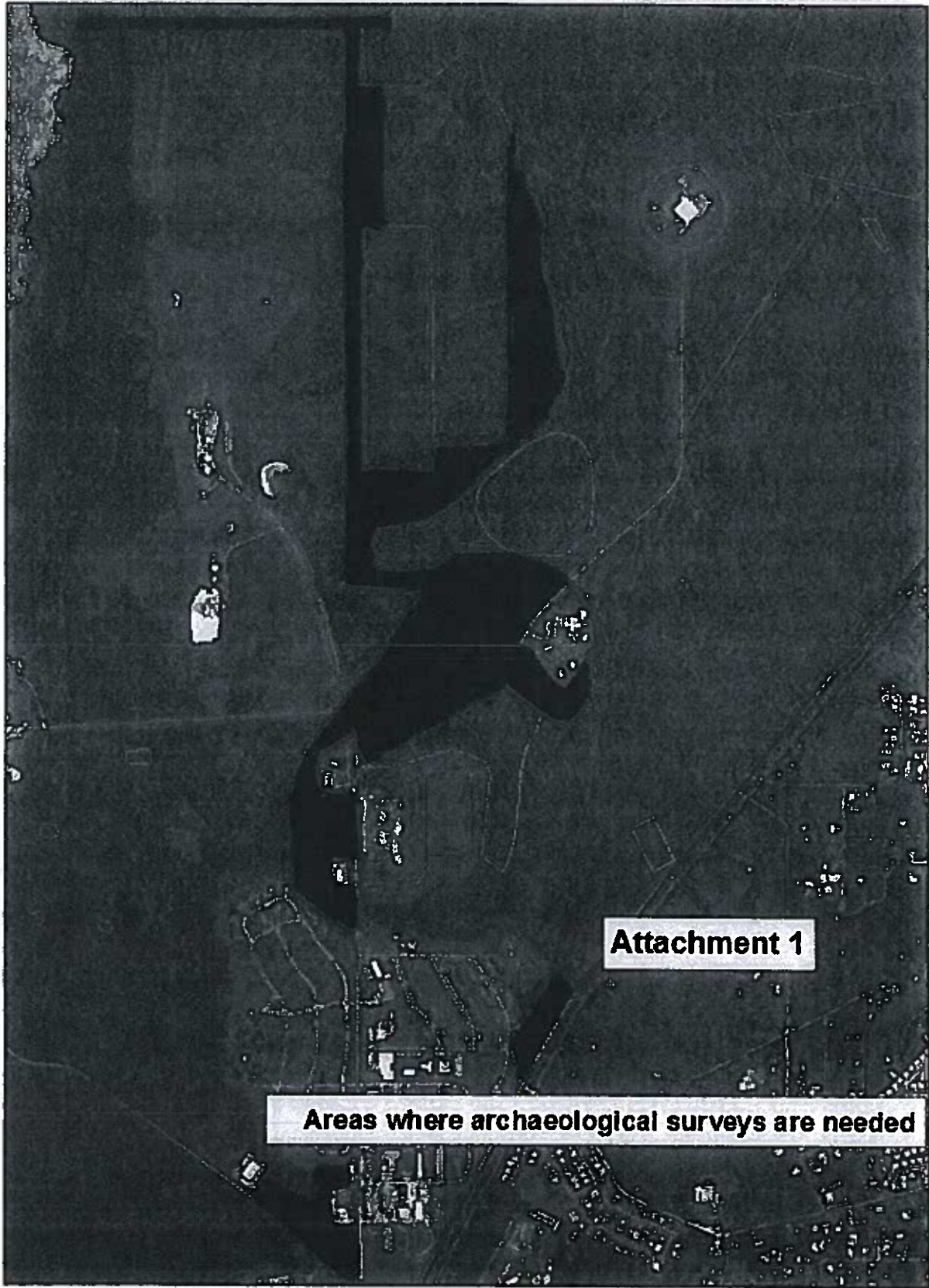
Should you have any questions after a review of this letter please contact our office.

Sincerely,

  
Raymond F.Y. Blas  
Director

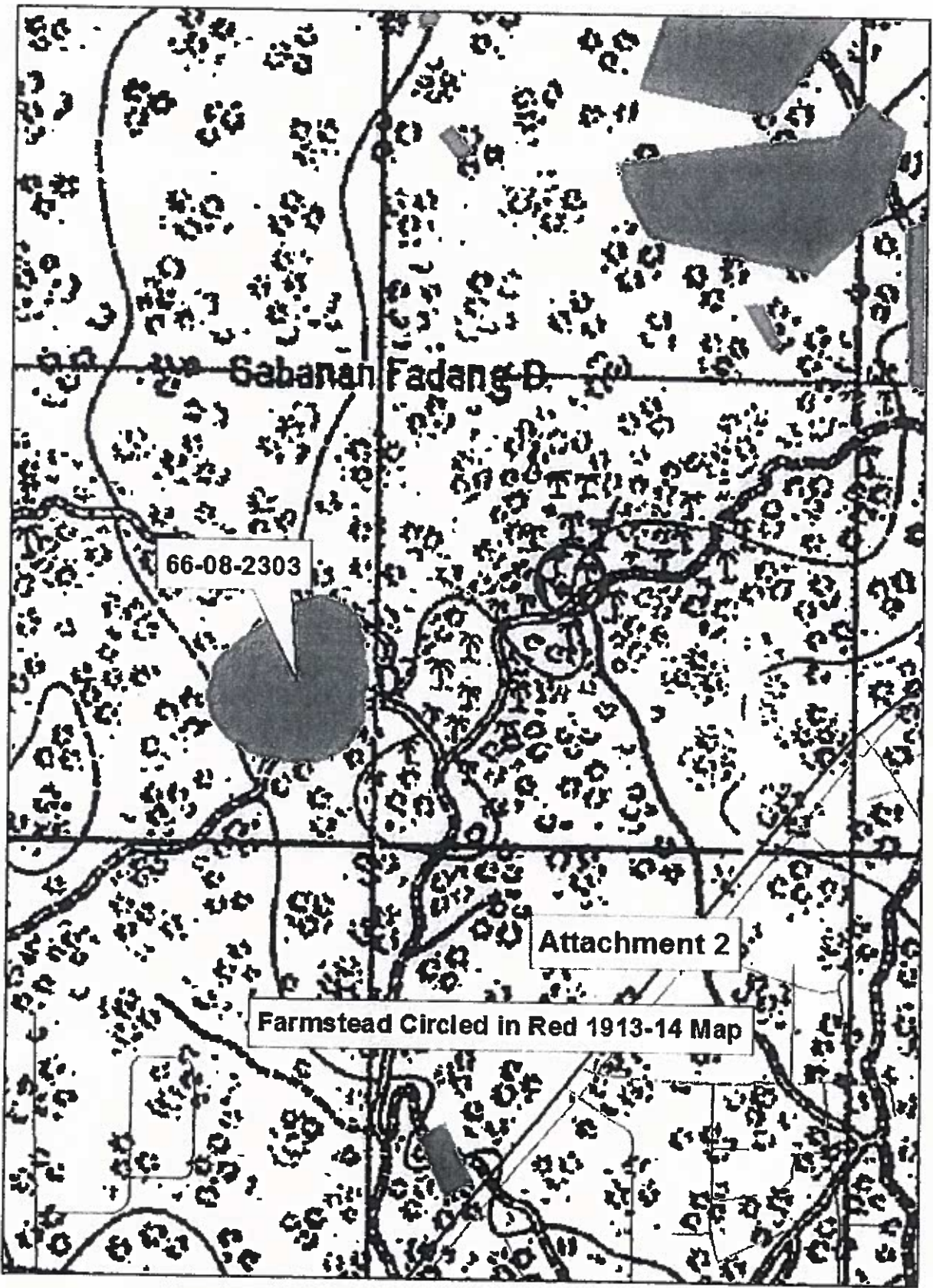
  
Lynda Bordallo Aguon  
State Historic Preservation Officer

Cc. Ronnie Rogers



**Attachment 1**

**Areas where archaeological surveys are needed**



66-08-2303

Sabanah Padang B.

Attachment 2

Farmstead Circled in Red 1913-14 Map

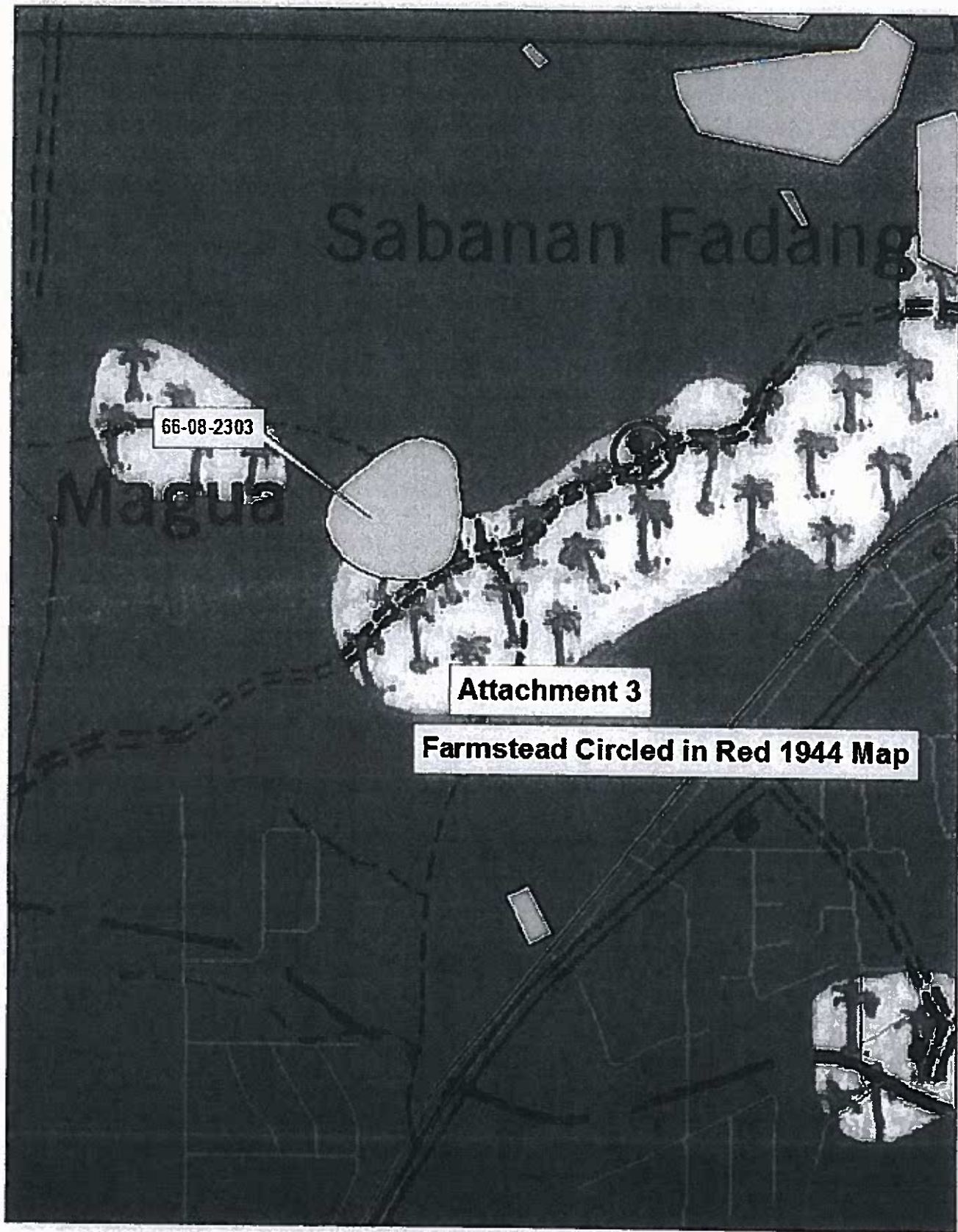
Sabanan Fadang

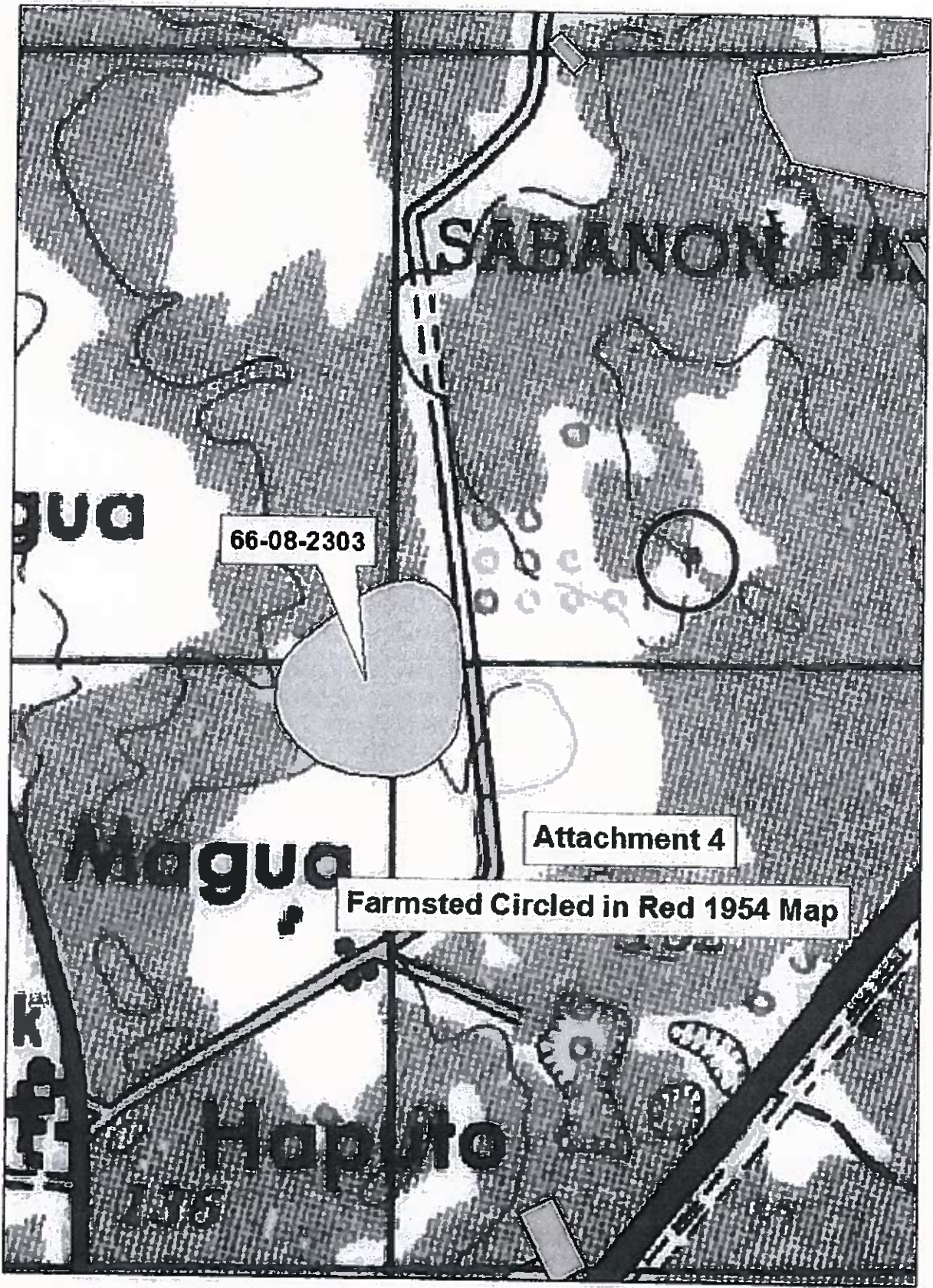
66-08-2303

Magua

Attachment 3

Farmstead Circled in Red 1944 Map





SABANON FARM

Magua

66-08-2303

Magua

Attachment 4

Farmsted Circled in Red 1954 Map

Hapito

Hapito





Christine M. Olkeriil <christine.olkeriil@dpr.guam.gov>

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## Comments on SEIS 2nd Revision

1 message

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Lynda B. Aguon <lynda.aguon@dpr.guam.gov>  
To: "Antone, Carly R CIV NAVFAC PAC, EV" <carly.antone@navy.mil>  
Cc: "Christine M. Olkeriil" <christine.olkeriil@dpr.guam.gov>

Tue, Mar 31, 2015 at 4:14 PM

Hi Carly,

Please find Mr. John Joseph's comments attached. He'll be returning to work on April 17.

Thank you kindly for allowing the extension and most especially for your patience.

Sincerely,  
Lynda

--  
*Si Yu'os Ma'åse'.*

*Lynda Bordallo Aguon, MPA  
State Historic Preservation Officer  
Guam Historic Resources Division  
(State Historic Preservation Office)  
Department of Parks and Recreation  
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 **Comments SEIS 2nd Revision.pdf**  
216K

RC2013-0853

March 31, 2015

Ms. Carly R. Antone  
Archaeologist  
Naval Facilities Engineering Command, Pacific  
258 Makalapa Drive, Suite 100  
Pearl Harbor, Hawaii 96860-3134  
Desk: (808) 472-1464

Subject: Review of: *Draft In-Fill Cultural Resources Reports for Live Fire Training Range Complex (LFTRC) and Main Cantonment Alternatives to Support Roadmap Adjustments 2012, Supplemental Environmental Impact Statement (SEIS) Volumes I and II and Draft Proposed Guam and CNMI Military Relocation 2012 Roadmap Adjustments SEIS Live Fire Training Range Complex Surface Danger Zones (SDZs) In-Fill Cultural Resource Studies Volumes I and II*

Dear Carly,

As previously done in our October 20, 2014 review on Volume III: Potential Direct and Indirect Impact Area Cultural Resources Study Synthesis, I am providing you Mr. John Joseph's (State Archaeologist) review on the SEIS Revision. Mr. Joseph is on vacation until April 17. He did convey to me that it was very time consuming retrieving reports that contain survey maps related to the maps in the SEIS and geo-referencing these. Upon comparison, he noted concerns and inconsistencies that should be addressed. He also stressed that he only completed reviewing one-fourth of the SEIS. Nonetheless, please find Mr. Joseph's review below:

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In reviewing the subject documents we've focused, though not entirely on the current preferred alternative live fire training range complex at Northwest Field. We have found a survey conducted by Search, Inc. in 2014 that has not been reviewed by our office and only temporary site numbers have been issued. However, the survey and the sites are included in this current draft of the SEIS as if the report has been reviewed and its findings approved by our office. We have noticed that some of the GHPI site numbers previously issued by our office have not been inserted into SEIS such as 66-08-2707 and others. Also, the sites in the Marine Training Area have not been or were not changed to the reassigned numbers provided in our correspondence to Ms. Conte. Are you aware of these correspondences (emails) sent to Ms. Conte concerning the SEIS? And if so what was the last one she incorporated into the SEIS. It seems we are providing comments, assigning GHPI numbers but they are not integrated into SEIS. We have previously mentioned problems with the site documentation and background research, however, no one has inquired at our office concerning this information. We previously noted that GHPI Site 66-04-0022 Pagat Village: In reviewing the site file for Pagat Village there are two trails by which the Pagat Village is accessed. These two trails are part of the site and need to be included not only in the discussion but on the maps.

Last year we received limited shapefiles on the LFTRC from Cardno TEC, in comparing these with the information in the SEIS we have found some discrepancies, which is a cause for concern. The survey by Search, Inc. referred to above apparently crossed into the previous surveyed area by Cardno TEC, locating several sites within the already surveyed area, placing suspicion and skepticism on the previous surveys done by Cardno TEC for the SEIS. We have recently pointed out that back ground research was not thoroughly conducted in the Welch 2010 report, noting a rancho located on the landscape since 1913 was not mentioned in the Welch 2010 nor identified in the study. However, our staff was able to locate remnants of the rancho, a large concrete water catchment within ten minutes leaving the vehicle. It is unbeknown to us how such a prominent feature on the

landscape can be overlooked. Although, this site has been identified there has been no request for assistance from NAVFAC to issue a GHPI number for the site, however, we have taken it upon ourselves to issue the GHPI Number 66-08-2804.

In the 2008 Programmatic Agreement (PA), our office was promised shapefiles dealing with all Navy work, this promise was again put in writing with the 2011 PA for all work associated with the Guam Build-Up. Only recently (2014) have we received limited shapefiles with this current roadmap. Our office has been and is working on the task the Department of Defense promised to provide in the 2011-PA, which takes valuable time and resources to complete. There are hundreds of sites that have not been entered into our GIS and maps that need to be georeferenced. Mr. Ronnie Rogers, DON-DPRI Program Archaeologist informed State Archaeologist, John Mark Joseph in a March 23, 2015 conversation that he was told that the shapefiles were included in the CD's provided to our office of the reports. However, in reviewing the CD's provided to our office we cannot find a single shapefile on the disc. One disc from one report has several incomplete maps exported from an ESRI program in a GIS folder but there are no shapefiles.

In further review we found where TEC Inc. presented in the *Cultural Resources Investigations Conducted in the Territory of Guam Supporting the Joint Guam Build-Up Environmental Impact Statement: Archaeological Surveys on Guam 2009 at Proposed Utility Sites, Harmon Annex and Andersen AFB* prepared for Department of Navy, March 2011 findings from an unpublished and unreviewed manuscript concerning the survey of 297 acres. As we have no conception of this manuscript, such a document would have to be published and sent to our office for review before we are able to comment on any such study. However, in checking our records we found that we had received a Draft- Cultural Resources Survey of 297 acres at AAFB, DOAF by e2M, however, we find no record of our review or acceptance of the final report. This particular report or lack of, throws up red flags when it comes to reporting the contents of the report as noted in the *Final Work Plan, Andersen Air Force Base, Guam, National Historic Preservation Act Section 110 Cultural Resources Identification and Evaluation Studies, 2015 by Cardno TEC, prepared for by NAVFAC, 2015*. This above work plan indicates that the survey conducted by Church et al. on page 2-43, Figure 2.9 directly north of Potts Junction completely covered the landscape, however this is untrue, Church et al. only surveyed the perimeter fence line of the property not the entire property. This type of reporting throws further suspicion and skepticism on the documents submitted to our office for review.

In further review of the 6.2. Main Cantonment/Housing Alternative and 6.2.1 In-Fill Survey Results we find this draft of the SEIS provides no testing was done of site 66-04-2757, all shovel test pits (Stps) were done outside of the site where one would not expect to find any cultural deposition. The site description expressed that visibility was 0 present in dense vegetation to 20 percent in area where utility and Highway rights of way. To make a determination on a site without properly testing a site that has 0 to 20 percent visibility is inconceivable methodology for making a National Register determination. We would not expect any findings outside of the site as this survey does, mainly because it's not the site.

In reviewing and correcting the mistakes previously noted at in NBGMS we find that the light black lines pointing to the sites are unmanageably difficult to see as the majority of the background is a black to dark green in Volume 1, Figure 7.5. This becomes even more arduous a task if the insert is blown up and georeferenced. Although it's only after working with this map, later did we locate the map in Volume 3, Figure 3-11 that provides a little clarity to the situation. We have noticed that the configuration of the Laguet Complex, GHPI site 66-02-0149 has not changed since our comments and the site does not reflect the site as established by Reinman and recorded in our site files. Furthermore there are new sites or polygons that appear on your map with no numbers or references to them. At first we believed that this was an attempt to group sites together, however, on closer examination it seems they actually split some sites into. Some sites present both site and map numbers and yet others have dropped the site number leaving only the map number. Below we have made a table to reflect the numbers that need to be retracted and the corresponding designation. The table includes numerous map numbers provided in Welch 2010, these are include and are part of the Laguet Complex and cannot be singled out from the whole. However, now that we are able to see a bigger picture from the previous surveys such as Welch 2010, we find that other sites in close proximity to the Laguet Complex perhaps should be included in this complex. The majority of

these sites may only be separated by an arbitrary line. The boundaries of the Laguet Complex have been and are still held in our site files. We are currently georeferencing the map in Volume III to see if they indeed match up with the previous maps and numbers provided.

Laguet Complex GHPI Site Number	Related GHPI Site Numbers	Numbers Included in the Laguet Complex
66-02-0149		
66-02-0149.1	66-02-2327	
66-02-0149.2	66-02-2340	
66-02-0149.3		52
66-02-0149.4	66-02-2341	
66-02-0149.5	66-02-2360	
66-02-0149.6	66-02-2359	610
66-02-0149.7	66-02-2342	
66-02-0149.8	66-02-2328	
66-02-0149.9		64
66-02-0149.10		652
66-02-0149.11	66-02-2357	55
66-02-0149.12	66-02-0149A (Welch 2010)	
66-02-0149.13		609
66-02-0149.14		612
66-02-0149.15		608

We have noticed that Maulalp River Complex, GHPI site number 66-02-1978 was has been re-number reflecting the GHPI site number 66-02-2329. However we show that there is a small site to the southwest of GHPI site number 66-02-1978, which could possibly be GHPI site number 66-02-2329.

As previously noted we believe Admiral Nimitz Golf Course is significant as a rural historic landscape and was not fully assessed in the previous surveys. The lack of any proper assessment was found when pre-contact and historic sites were impacted during the removal of soil from the golf course. However, the rural historic landscape includes all associated buildings and Golf Course Shelters. Our source indicates that 66-04-2624 were built long before 1982 and most likely constructed right after approved design. Even with the closing of Admiral Nimitz Golf Course and adverse effect of the removal of sand and soil from the site, the additional course features added and changed throughout the years, Admiral Nimitz Golf Course still maintains the location, design, setting, and materials of the site and the course still embodies the feeling and integrity of a rural historic landscape on Guam. Therefore, we do not concur with your determination and we believe the site is eligible for listing in the NRHP as a rural historic landscape. It should be noted that sites 66-08-2305 and 66-08-2306 were not mitigated with any previous PA Memo sent to our office.

In 1988 PHRI found seven sites found during a reconnaissance survey that site numbers had not been assigned to until recently, these sites are above and below the Marine Training Area. Figure 4-37 provides several sites within close proximity to these sites. Once the sites in close proximity are identified we will make any corrections on the GIS and provide the corresponding numbers identified in the GIS.

The table below provides the numbers issued for the seven PHRI sites.

PHRI Temporary Site Numbers	GHPI Numbers
T-1	66-08-2797
T-2	66-08-2798
T-3	66-08-2799
T-4	66-08-2800
T-5	66-08-2801
T-7	66-08-2802

As we continue reviewing the SEIS, we noticed that site 66-08-0214 is located in the middle of the LFTRC done by Cardno TEC, however, this site was not discovered in their survey of the area. We will look back closely to find out the reason why this site was not discovered as the site number was issued in or before 1994.

Reviewing the IT/COMM Lines, we could not happen to notice that Figure 4-6c and Figure 4-7c, are exactly the same for Alternative C and Alternatives 2, 3 and 4 and we are wondering if this was a mistake and if not why are these figures not combined together. This too can be said for Figures 4-9c, 4-10c and 4-11c, which are the same. In reviewing our files a portion of this direct impact area was surveyed by Kurashina, McGrath and Manner in 1987, in a Reconnaissance Survey is not appropriate for projects submitted for review pursuant to Section 106 that the transect intervals noted. Also, this combined with the recent findings of Latte Period human remains in shallow graves on the northern plateau, provides even more evidence that such an investigation should not be considered as viable survey in today's world armed with this new information.

---

Please contact us should you require clarification.

  
Lynda Bordaño Aguon  
Guam SHPO

Cc. Ronnie Rogers



**Eddie B. Calvo**  
Governor  
**Ray Tenorio**  
Lt. Governor

**Department of Parks and Recreation  
Government of Guam**

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Parks Division: (671) 475-6291  
Guam Historic Resources Division: (671) 475-6294/5



**William N. Reyes**  
Director  
**John P. Taitano**  
Deputy Director

ATTACHMENT 6 (3 pgs.)

In reply refer to:  
RC2013-1101

January 9, 2018

Mr. William Arnold  
JRM Archaeologist  
NAVFACENG Command  
Public Works Dept. (PCAG PWD)  
PSC 455 Box 195  
FPO AP 96540-2937

Subject: Review of Revised PA Memo #2 J-755 Urban Combat Training Project – Construction of Training Areas (Andersen South)

Dear Mr. Arnold,

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.

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 19<sup>th</sup> and early 20<sup>th</sup> 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.

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 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 22<sup>nd</sup> 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.

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.

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.

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*.

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.

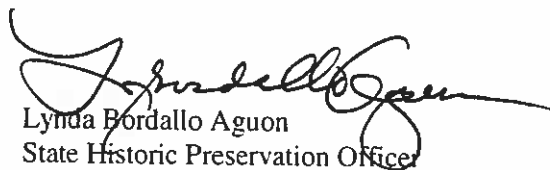
Considering the methodology, limited survey sampling, the ambiguity of the written record, and the absence of consideration for known property types that may be eligible for listing on the NRHP, including not finding previously known sites, the identification and evaluation efforts of MCAG do not meet 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.

Please contact our office should you need clarification. *Si Yu'os Ma'āse'*.

Sincerely,

  
William N. Reyes  
Director

  
Lynda Bordallo Aguon  
State Historic Preservation Officer

Cc: Albert Borja, MCAG Environmental  
John Salas, NAVFACMAR  
Carly Antone, NAVFACENG-HNL



The following is taken verbatim from ONI-99, starting on page 146 where the text discusses the situation of the Dededo-Ritidian Roads, prior to the 1944 U.S. invasion. Attached are three maps, the southern section showing the Dededo end of the roads, the northern section showing the Ritidian Point end of the roads, and the northern section with the Machanao hamlet showing at its south end. Red dots are placed on the maps which coincide with the grid used on the Marine Corps School Map that is the location reference used throughout the text. Road photographs from the text are placed on one of the northern section maps in their general locations.

1729.75        leave DEDEDO

1729.75 TO 1738.75

The road passes through relatively level country and preserves excellent alignment, three miles of the road being practically straight. In general there is heavy forest vegetation along both sides of the roadway, also there are a few clearings and scattered ranch houses. The roadway is approximately 18 feet wide, well surfaced with cascajo but without bituminous binder. The water-bound macadam thus produced makes a safe roadway for ordinary traffic but grows mossy and is very slippery when wet, particularly where the road is heavily shaded by trees. Ordinarily, however, speeds in excess of 50 miles an hour are entirely practical on this road.

1738.75

MACHANAO patrolman's quarters and settlement. A small group of ranch houses in this vicinity- was administered by a patrolman resident at the turn of the road. On a short branch road extending NE'd, there is a water tank of re-inforced concrete.

1738.75 to

1742.35        The roadway is merely a track through the forest, but maintains excellent grade and alignment. Most of this road is lightly cascajoed and fair speeds (up to 35 m.p.h.) can be maintained under any weather conditions on most of this route. There are a few clearings, but by far the greater part of the roadway lies through dense forests, with many groves of panao, and also ifil in considerable numbers.

1742.35 to

1745.3        The quality of the roadway, both in grade and alignment, deteriorates considerably. It is passable in all weather, at low speeds, but there are many sharp turns to avoid large trees and occasional rocky outcrops. Grades never exceed 5% however, and a generous coating of cascajo has been applied to various sections of this roadway in order that it might be used as a construction road for the RITIDIAN turn of the N. GUAM military road. This road is everywhere through dense forests and in the section N. of coordinate 1745 skirts the edge of rough, reef-limestone country along the cliff face.

The trail which continues this roadway to RITIDIAN Lighthouse passes through extremely rough reef-limestone terrain.

**NEW ROAD**

On leaving the center of DEDEDO Community the new road continues the line of the "main street" of the village. For perhaps 500 yards the road is straight and practically level. It then turns left on a wide

curve and there follows a tangent approximately 1 miles in length. This tangent is not level, however, since there is a short down-grade of about 8% at coordinate 1731.05. There are large cascajo pits on the right side of the road at approximately coordinates 1730.6 and 1731.6. On approaching coordinate 1732.0 the road turns again to the right and proceeds north northeasterly, roughly parallel to the coastline.

All of this roadway is surfaced to a minimum width of 36', the surfacing consisting of cascajo at least one foot thick, well rolled and compacted and capable of carrying motor traffic at speeds well in excess of 60 m.p.h. Between coordinates 1729.8 and 1731.0 there are a few trees close to the road, most of the land being used for pasture or for garden crops. At about coordinate 1731.0 there is a rocky northwestward slope where there is a change in elevation of approximately 25'. There are more trees along the line of this slope, but this is followed by a relatively clearer terrain until about coordinate 1731.5, when the road runs into a rather heavily forested area. The roadway clearing is everywhere maintained at a minimum of 100'.

1732.0 to  
1737.5

After turning NNE the road proceeds on a perfectly straight course for approximately 3 miles. The grades in this section are not more than 1% and all of the clearing and grading had been done in December 1941. The surfaced road, extends only to coordinate 1734.2. To that point the roadway is invariably in a wide clearing in dense forest. It is in every respect a road designed for high speeds and heavy traffic, although no bituminous binder coat has as yet been applied to the well rolled and compacted cascajo. At coordinate 1734.2 the cascajo surfacing ends and at about coordinate 1734.6 the road passes to seaward of a considerable sink hole. The sink holes are fairly numerous in the terrain close to the cliffs, but the road does not intersect any of them. From coordinates 1735.0 to 1737.0 there are several clearings where, for distances of several hundred yards, there are no trees near the roadway. Some of this land is cultivated but more is used for grazing. There are very few houses near or along this roadway.

1737.5 to  
1739.0

Behind HAPUTO Point and in the district known as PUGUA there are two minor changes of direction of the roadway as cleared and graded. In this section there are no clearings of any extent and many large forest trees.

1739.0 to  
1742.5

This stretch of roadway, as projected, cleared and graded, included a tangent approximately 1½ miles in length, which, as surfaced, contains no grade in excess of 1%. It is everywhere in dense forest.



## Old Ritidian Road 1941

Road through the forest of North Guam, typical of a great deal of these roadways. This particular road is a part of that between coordinates 1738.75 and 1742.35

1742.5 to  
1744.4

After a minor change in direction at coordinate 1742.5 the road proceeds by a mile long tangent to the beginning of the wide radius curve at Ritidian. This section has been cleared and roughly graded and is not expected to contain grades in excess of 1%.

1744.4 to  
1102.0

This is a completed section of the N. Guam military road. It consists mostly of a curve and lies in a wide clearing in dense forest. The roadway is surfaced to a minimum width of 36', well rolled and compacted and capable of carrying high speed traffic. There are two large cascajo pits near the roadway, one at

about coordinate 1101.0 and the other at about coordinate 1101.75, both S. of the roadway. At coordinate 1101.9 the spur road to Ritidian lies left of the main road. This spur road will be described now.



## Old Ritidian Road

Photo shows the cascajo applied to enable the road to carry heavy truck traffic. This section is from coordinates 1742.3-1101.0 to 1744.7-1100.85. The trees in this vicinity are mostly panao, considerable groves of which are found in N. Guam.

### T. RITIDIAN Spur Road

1744.75 to  
1746.25

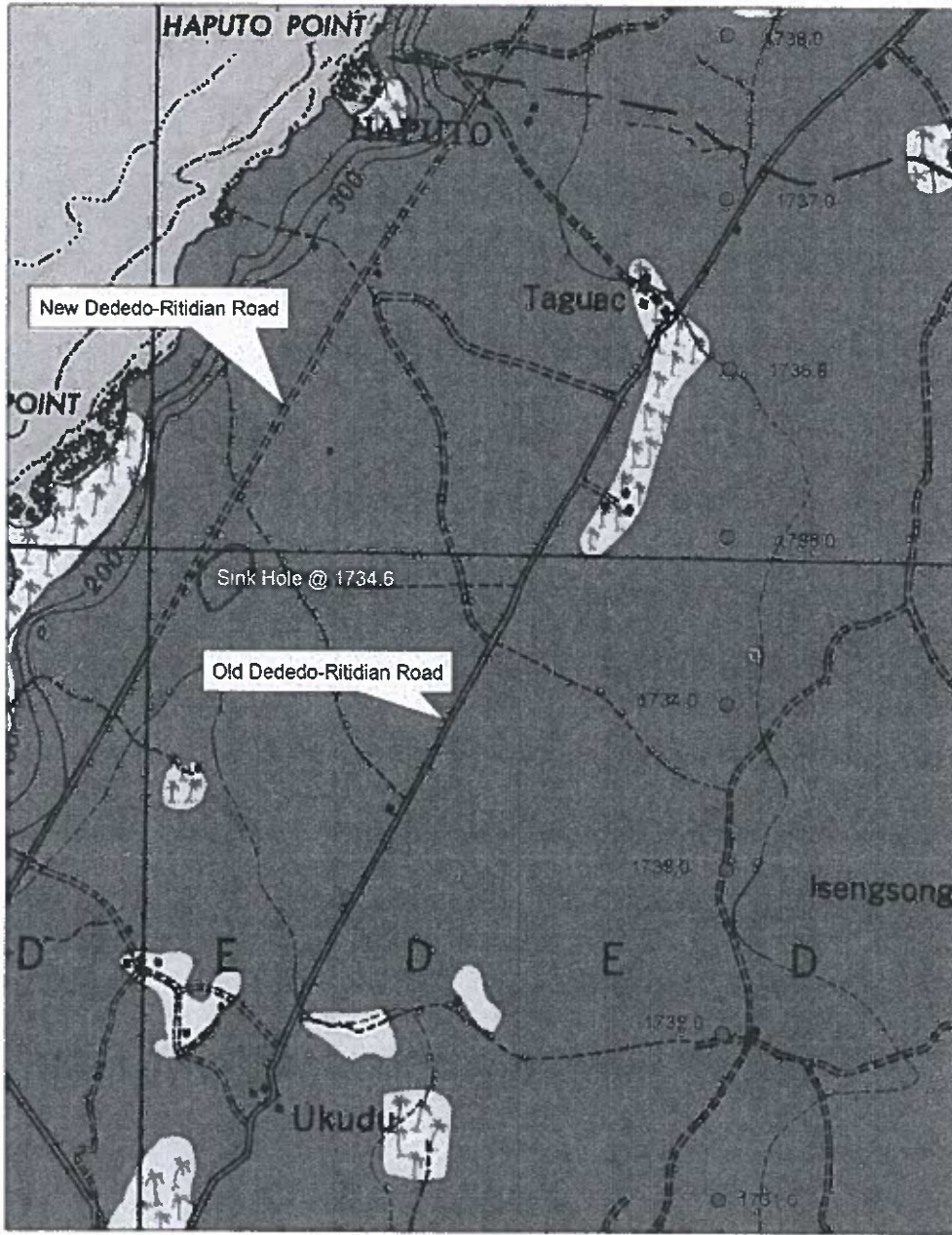
The road is constructed to main road standards, with a surfaced width of at least 36'. It is straight for perhaps 1000' after leaving the main road but then turns on a wide radius to the left, then ascending at a relatively easy grade (not more than 6%). The final 3/8 mile of this roadway lies in extremely rough reef limestone country and is largely a product of blasting. There is a "turn around" at Ritidian Point. This "turn around" is about 20' below the base of the light tower and is hidden from seaward by a thick wall of rock. This road is everywhere in thick forest. A cascajo pit lies on the W. side of the road at about coordinate 1745.4.



## Old Road to Ritidian Point October 1941

This roadway is typical of the section between coordinates 1742.3-1101.0 and 1744.7-1100.85 on the Marine Corps School Map. Note the general level character of the terrain, the heavy forests, and the fact that this road has been metalled with a coat of cascajo to enable it to carry heavy truck traffic for construction of the Ritidian Point spur to the northward.

# Dededo-Ritidian Roads

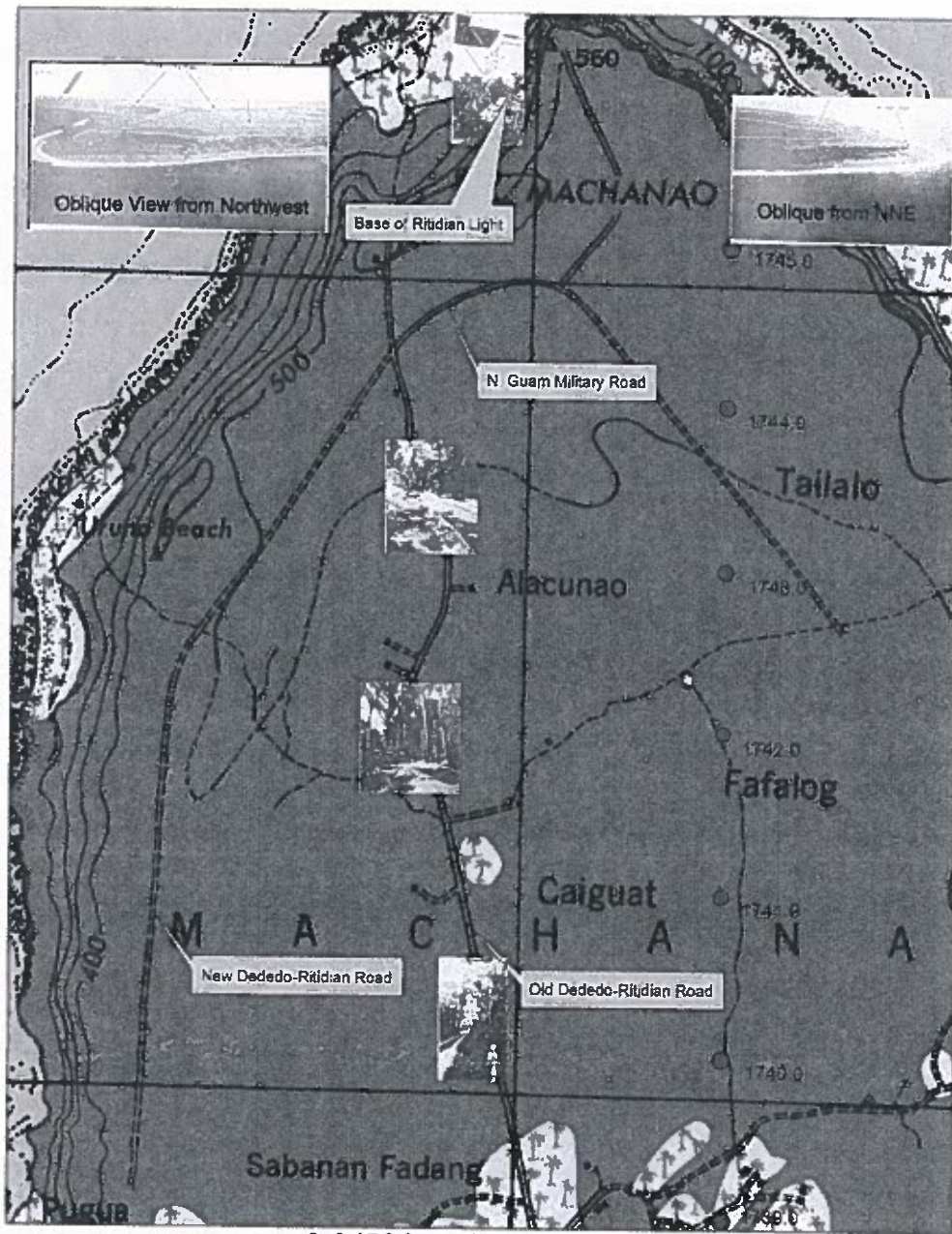


0 0.150.3 0.6 0.9 1.2 Miles

Southern Section from 1730.8 to 1738.2  
1944 US Army Map Service  
Scale 1:31,550



# Dededo-Ritidian Roads

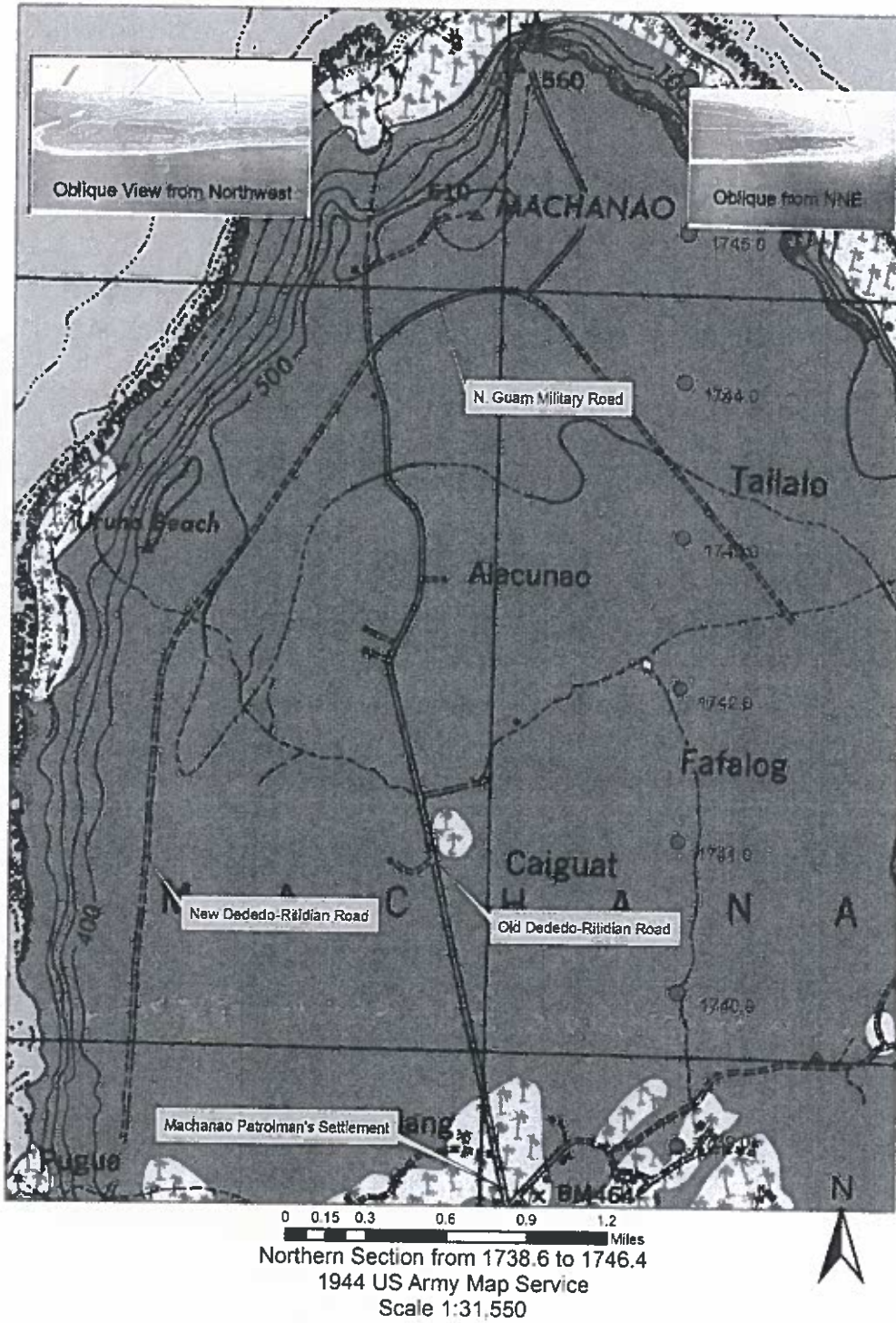


0 0.150.3 0.6 0.9 1.2 Miles

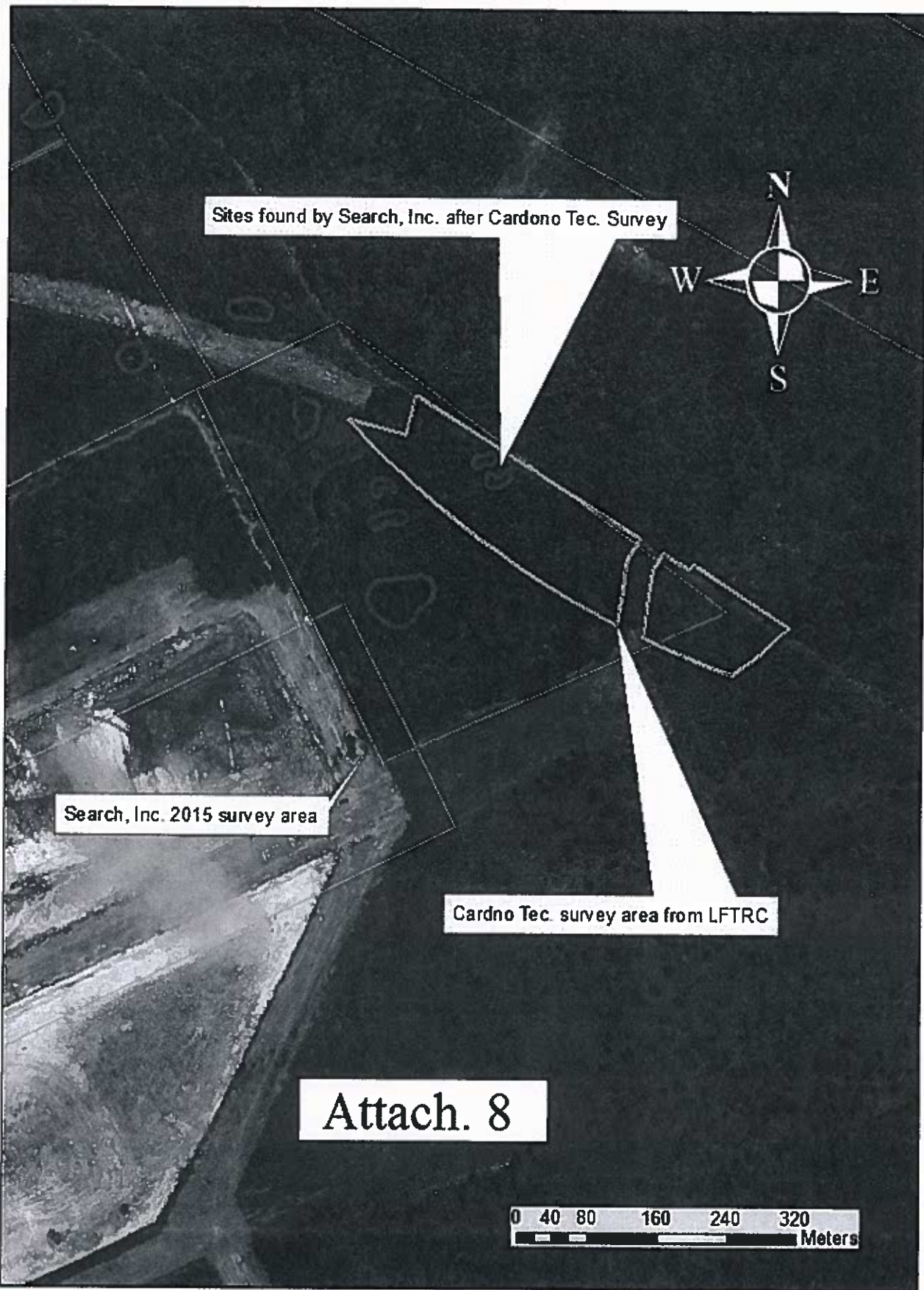
Northern Section from 1739.0 to 1746.4  
1944 US Army Map Service  
Scale 1:31,550



# Dededo-Ritidian Roads







Attach. 8

John Mark Joseph &lt;johnmark.joseph@dpr.guam.gov&gt;



---

**new discovery**

---

Ronnie.Rogers@fe.navy.mil &lt;Ronnie.Rogers@fe.navy.mil&gt;

Tue, Mar 20, 2018 at 2:32 PM

To: lynda.aguon@dpr.guam.gov, johnmark.joseph@dpr.guam.gov

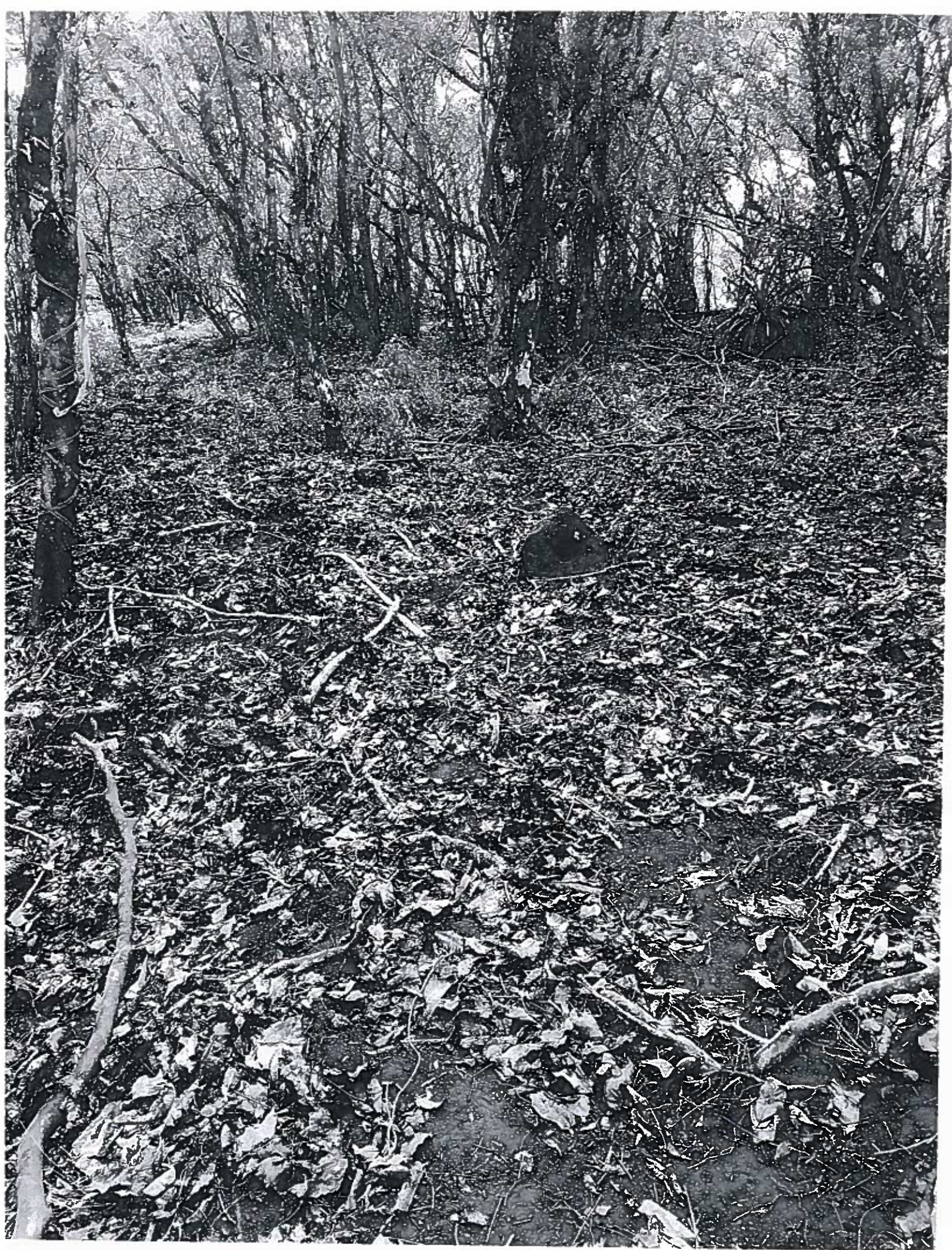
Cc: Albert.Borja@fe.navy.mil, William.Arnold@fe.navy.mil, Lon.Bulgrin@fe.navy.mil, Sandra.Yee@fe.navy.mil

Last Friday, we were informed of the discovery of a lusong in the J-001B project area. We compared the GPS coordinates taken at the lusong with known sites and found that the lusong is on a previously recorded site: 66-08-2699. The location had originally been reported in Welch 2009 as a bottle scatter, but had not been assigned a site number. John requested additional information in 2014, which Al and I provided in a report following a site visit. The site was recorded as a bottle scatter with some scattered metal on the surface and was determined to be not eligible. In response to discovery of the Latte component, MCAG and JRM archaeologists visited the site and made plans to conduct subsurface tests; however, we were informed that MEC assistance would be required. MCAG archaeologist Sandy Yee accompanied MEC to the location and together they established a shovel test pattern extending in cardinal directions outward from the lusong that avoided metallic anomalies. This morning (3/20/18), Sandy, Shawn Arnold and Ronnie Rogers dug and screened the shovel tests. All tests contained a mix of historic and Latte Period material in disturbed context throughout the tests. Based on results of the investigation, we determined that the site retains its original determination of "not eligible." We plan to recover the lusong prior to removing vegetation from the site. We will provide SHPO with a field report, including maps and photos, as soon as possible.

R/Ronnie - MCAG PWD  
(671) 355-3230



troy's photo of the site.jpg  
3891K





Eddie B. Calvo  
Governor

Ray Tenorio  
Lt. Governor

Department of Parks and Recreation  
Government of Guam  
490 Chalan Palasyo  
Agana Heights, Guam 96910  
Director's Office: (671) 475-6296/7  
Facsimile: (671) 477-0997  
Parks Division: (671) 475-6288/9  
Guam Historic Resources Division: (671) 475-6294/5  
Facsimile: (671) 477-2822

ATTACHMENT 10 (3 pgs.)



Raymond F.Y. Blas  
Director

In reply refer to:  
RC2013-0853

September 3, 2013

Karen Sumida  
Business Line Manager  
Environmental  
Naval Facilities Engineering Command Pacific  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134

Subject: *Second Review Letter: Draft In-Fill Cultural Resources Reports for Live Fire Training Range Complex (LFTRC) and Main Cantonment Alternatives to Support Roadmap Adjustments 2012, Supplemental Environmental Impact Statement (SEIS) Volumes I and II and Draft Proposed Guam and CNMI Military Relocation 2012 Roadmap Adjustments SEIS Live Fire Training Range Complex Surface Danger Zones (SDZs) In-Fill Cultural Resource Studies Volumes I and II*

Dear Ms. Sumida,

Provided below is our final review on the draft subject documents. Thank you for allowing us more time to submit our comments.

In both Volume II, Chapter numbers are provided in the Table of Contents, but there are no corresponding Chapter numbers in the Volumes only titles.

1. Volume I, 10.0 Site Synthesis and Conclusion: This section provides information on two areas of Potential Direct Impact Study Area for the LFTRC AABF-NWF Alternative. We could not find the discussion for the following areas: MPMG Rang; KD Rifle Range; KD Pistol Range; and MRF Range; in either of the Volume I Narratives. Previously identified sites 66-08-2508 and 66-08-2522 are considered "Not Eligible" for the NRHP according to Figure 10-1 of the Live Fire Training Range Complex Foot Print and Main Cantonment Alternatives report. However, in Volume I of the Live Fire Training Range Complex Surface Danger Zones (SDZs) report, these sites 66-08-2508 and 66-08-2522 are considered "Eligible" for listing on the NRHP. Numerous other maps in this section are illegible and therefore, could not review this section of the document at this time. We request that these discrepancies and maps be reviewed and resubmitted to our office in the final report.

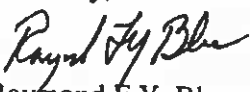
2. Volume II, Site Description Site T-RIT-001: In reviewing the data presented, it is apparent that the site is part of the Pajon Point Site (66-08-0013) recorded by Fred Reinman in 1966. This site is listed on the Guam Register of Historic Places, and is eligible for the National Register. Thus, the GHPI Data Form for 66-08-0013 needs to be updated.
3. Volume II, Site Description Site T-RIT-002: This site was noted in Reinman's site description for 66-08-0013, however, no GHPI number was given. We have assigned GHPI number 66-01-2657 to this site, please complete a GHPI Data form for the site and present us with your determination.
4. Volume II, Site Description Site T-15-001: After careful review, we believe that T-15-001 should be considered part of Pagat Point site 66-04-021. This looks to be one of the original trails leading into Pagat Point and into Pagat. No GHPI number will be issued for this site therefore, the GHPI Data form for the Pagat Point site will need to be updated.
5. The Pagat Site 66-04-0022 is not correctly represented on the maps presented in the SEIS. The site, listed on the National Register, has very different boundaries than what is presented in these documents. Contact our office should you require clarification when correcting this error.
6. Volume II, T-TA-001: This site is impossible to see from the amount of vegetation presented in the photo. The statement "it is possible that more cultural materials are present upslope" tells us that this site was not thoroughly investigated or reported on.
7. Volume II Site Descriptions: There are discrepancies on these descriptions that need to be cleared up before we can concur or not on the determinations. Two examples are the T-TA-003 and T-TA-017. The T-TA-003 picture of the site and the map of the site do not seem to match. The T-TA-017 site description provides data that the depth of the Pre-Latte ceramics were present 20 centimeters below depth, yet there is no evidence of shovel test pits (Stps) in the description, nor are there any Stps on the map, how was the conclusion made that the evidence of multi-component site with a Pre-Latte component would be highly significant. The photo of the volcanic flakes is impossible to identify, as too is the scale. If the ceramics photographed are of the Pre-Latte period, then please provide an in-depth analysis these sherds, along with drawings and close up photographs. We would also like to see a comparison between the Pre-Latte and Latte period artifacts found at the site.
8. Volume I, SDZs: This volume does not allow the reviewer to quickly identify and look for associations of sites in the indirect and direct impact survey areas as well as isolated finds. There is no mention of considering any of these sites as a district. Page 6-47, Site T-TA-46 provides description of ceramics in the text for Figure 6-12; however, there is no identifying blue shell edge or any red sponge ware in the picture. Many of the maps are illegible and therefore cannot be reviewed.

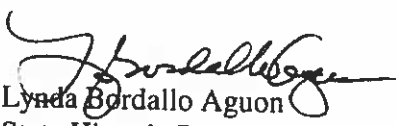
9. Site Numbers have been assigned to the remainder of the T-TA- (sites) please see the table below:

GHPI Number	Temporary Site #	GHPI number	Temporary Site #
66-09-2660	T-TA-003	66-09-2666	T-TA-021
66-09-2661	T-TA-012	66-09-2667	T-TA-022
66-09-2662	T-TA-017	66-09-2668	T-TA-023
66-09-2663	T-TA-018	66-09-2669	T-TA-024
66-09-2664	T-TA-019	66-09-2670	T-TA-025
66-09-2665	T-TA-020	66-09-2671	T-TA-026
66-09-2672	T-TA-027	66-09-2681	T-TA-037
66-09-2673	T-TA-028	66-09-2682	T-TA-038
66-09-2674	T-TA-029	66-09-2683	T-TA-039
66-09-2675	T-TA-030	66-09-2684	T-TA-040
66-09-2676	T-TA-032	66-09-2685	T-TA-041
66-09-2677	T-TA-033	66-09-2686	T-TA-042
66-09-2678	T-TA-034	66-09-2687	T-TA-043
66-09-2679	T-TA-035	66-09-2688	T-TA-045
66-09-2680	T-TA-036	66-09-2689	T-TA-046

We look forward to the revised draft and a thorough review of the final documents before they are submitted to our office. Since we only have one reviewer on staff, we would appreciate more time to review the final documents. Should you have any questions please contact our office at (671) 475-6339.

Sincerely,

  
 Raymond F. Y. Blas  
 Director

  
 Lynda Bordallo Aguon  
 State Historic Preservation Officer

Cc: Patty Conte, NAVFAC Pacific  
 Ronnie Rogers, NAVFAC Marianas



John Mark Joseph &lt;johnmark.joseph@dpr.guam.gov&gt;

**(no subject)**

John Mark Joseph &lt;johnmark.joseph@dpr.guam.gov&gt;

Wed, Aug 20, 2014 at 4:27 PM

To: "Conte, Patricia J CIV NAVFAC Pacific, EV" &lt;patricia.conte@navy.mil&gt;

Cc: "West, Eric W CIV NAVFAC PAC" &lt;eric.west@navy.mil&gt;, "Jennifer.Farley" &lt;Jennifer.Farley@fe.navy.mil&gt;, "Ronnie.Rogers@fe.navy.mil" &lt;Ronnie.rogers@fe.navy.mil&gt;, "Lynda B. Aguon" &lt;lynda.aguon@dpr.guam.gov&gt;, "Christine M. Olkeriil" &lt;christine.olkeriil@dpr.guam.gov&gt;, Kelly Yasaitis Fanizzo &lt;kfanizzo@achp.gov&gt;, Richard Olmo &lt;Richard.Olmo@dpr.guam.gov&gt;

Dear Patty,

Regarding the (Additional Direct Impact In-Fill Survey and Testing) area presented to us 8/12/2014 located along the roadway from Potts Junction around the western edge of Northwest Field and noted along the road to Ritidian;

1. As the scope of the project and depths reached by the utility lines are unknown and the roadway fluctuates throughout this area. Therefore, the best methodology for testing along the road would be with a backhoe to trench every 100 meters. This will allow the archaeologist to quickly assess the area to get to the depths of the perceived utilities.
2. We also noticed other changes to the Area of Potential Effect of Direct Impact Area. There is apparently a road or something that is below the fence line brought up earlier identified on the new maps provided us.
3. In other areas of survey, shovel test pits (Stps) should be conducted throughout at 10 meter (32 feet) intervals along 10 meter (32 feet) transects. If a site is found then, Stps should be place every five (5) meters (16 feet) in the cardinal directions to establish site integrity and possible delineation of site. Two consecutive negative Stps at five (5) meters (16 feet) may be use used as possible termination of site or designated area with in a larger site.
4. The map we sent you earlier of the Receivers Site, the GHPI numbers correspond to the temporary site numbers in 1987, Kurashina et al. report. Our copy of Kurashina report has the GHPI numbers in the book.

Si Yu'os Ma'åse',

John Mark Joseph  
 State Archaeologist, Guam  
 490 Chalan Palasyo  
 Agana Heights, GU 96910  
 (671)-475-6339  
 JohnMark.Joseph@dpr.guam.gov



John Mark Joseph <johnmark.joseph@dpr.guam.gov>

## Fwd: Draft Archaeological Data Recovery Plan For MILCON P-715, Andersen Air Force Base, Guam

2 messages

Lynda B. Aguon <lynda.aguon@dpr.guam.gov>  
To: John Mark Joseph <johnmark.joseph@dpr.guam.gov>

Mon, Dec 7, 2015 at 2:01 PM

----- Forwarded message -----

From: Lynda B. Aguon <lynda.aguon@dpr.guam.gov>  
Date: Mon, Dec 7, 2015 at 2:01 PM  
Subject: Draft Archaeological Data Recovery Plan For MILCON P-715, Andersen Air Force Base, Guam  
To: "Antone, Carly R CIV NAVFAC PAC, EV" <carly.antone@navy.mil>

Carly,

Below is John Mark Joseph's (State Archaeologist) comments.

We've reviewed the subject Draft Plan and have the following comments. We asked that you look closely at them because this should be a pre-draft plan not a pre-final as indicated. We also ask that there be some type of peer review before these documents are sent to our office:

1. We know the Live-Fire Training Range Complex (LFTRC) Alternate 5 has been changed to MILCON P-715. However, we ask that you keep the title consistent with previous reviews and keep LFTRC Alt. 5 as part of the title of the subject documents.
2. Please review the documents before they are sent to our office, at first glance some Figures are labeled MILCON P-17. This needs to be correct and quality control measures need to be put in place where these types of mistakes are not overlooked.
3. Page 1, INTRODUCTION, Sentence two, place the word "partial" between the words, "provides" and "mitigation."
4. The comments on the design work should have been requested before the reviewing of this report to save us both time and effort if we can avoid sites.
5. The Project Statement of Work indicates a Preliminary Draft, Draft and Final archaeological data recovery plans for MILCON-715, however this is our first review and it is labeled a Pre-Final.
6. Page 2, Project Statement of Work: A permanent datum shall be established for each site before excavations begin.
7. We notice that there is a one part of the MILCON-715 that was not previously disclosed in the SEIS or subsequent range mitigation discussions, and that this portion of the MILCON-715 overlaps the area of potential effect (APE) of the THAAD. Therefore we need to know who is the lead agency on this portion of the project and has there been consultation with the U.S. Army concerning this project?
8. There are many sites, which needed further evaluation that were not even indicated in this plan, therefore this document does not represent the true potential of historic sites impacted.
9. Page 15, Pre-Contact/Latte Period Sites: Current floral types in the area of the pottery scatter will want to be noted, which may also provide information on patterning.
10. Page 17, Question 4, second paragraph, line 17: This needs to be changed to (Liston et al, 1996) as there were many contributors to this document and not a sole author.



11. Page 17, 20<sup>th</sup> Century Sites: The number, location and temporal distribution of sites are subject to change with possible design changes. Therefore, a question or two could have been developed from our comments to NAVFAC concerning 20<sup>th</sup> century sites on the edge of the current Live-Fire Training Range design, especially possible WWII sites.
12. Page 20, Plant Microfossil Analysis, lines 5 and 6: The consultation on the determination should be concurred upon by the Guam Historic Resources Division as these studies are a part of Programmatic Agreement and mitigation process that is not written in stone.
13. Page 20, Sample Selection, Inventorying and Curation: Any efforts to minimize any materials obtained from the data recovery excavations needs to be consulted on with this office and possible the Advisory Council on Historic Preservation archaeologist before such samples are deaccession in any way shape or form. Perhaps a scope of collection statement (SOCS) should be set up for the work to be performed.
14. Page 21-23, A Figure should be inserted here showing the specific sites that are being impacted and those in close proximity to the direct impact zone due to possible changes in design. Sites of non-significance should also be indicated on this map. These will help everyone move forward if there is an inadvertent discovery during construction.
15. Page 21, line 22: There needs to be an identifier placed on the Dixon et al. 2011 citations and references, as there are three listed, making them indistinguishable. The Historic American Engineer Record for Northwest Field should be mentioned.
16. Page 23, lines 13 and 14: The GPS equipment being used should be indicated, and all data should be differentially corrected for submeter accuracy.
17. Page 24, Data Recovery and Fieldwork Actions, line 22: All features need to be drawn in both plan and profile views, with corresponding photographs. Profiles for fire pits and such are usually drawn after the feature has been bisected.
18. Page 26, lines 1-6: If there is an anomaly identified on the site, this anomaly needs to be excavated as it represents an artifact and possibly a multicomponent site, which would then need to be incorporated in to the Data Recovery efforts. The Alternate Approach needs to conduct further evaluation and or Data Recovery on a site rather than avoidance of a possible Spanish period or WWII site.
19. There is no drawing or photographs representing Guam Historic Properties Inventory (GHPI) Site 66-08-2492 only the description, please include both a plan view drawing and photographs of the site, this could be said too for a lot of the sites listed in this plan.
20. Page 26, GHPI Site 66-08-2494, line 23: The word "partially" should be inserted after the word "been" and before the word "bioturbated. The reason is that the pig wallowing is only located in four areas, not site wide.
21. Many of the same issues identified above are contemporaneous with the Site Definition Fieldwork Actions, Data Recovery Fieldwork Actions Laboratory and Data Analysis, etc., etc., etc. for the other sites in this report. They are basically verbatim with each site excluding the GHPI number and period designation. Therefore our comments can be applied to all of the sites in this document. Simplicity in a document without continuous replication makes for an easy review, if changes in actions are needed then those particular changes can be brought into the light as they arise with the individual site.
22. Page 45, line 18: Change the 06 to 66.
23. Pages 45 - 50: There is no explanation why Shovel test pits (Stps) were only excavated in a northwestward direction and no Stps were place in the cardinal directions from the positive Stp. This is especially problematic as GHPI Site 66-08-2732 is approximately 20 meters to the southeast for the positive Stp. Figure 8 shows an artifact distribution, however, it does not differentiate between the pre-historic artifacts and the historic artifacts. Furthermore, there is no mention of Feature 1 on the landscape, this feature needs to be defined and a treatment plan for recording it should be included in the write up.
24. Pages 51 - 55: There is no site map for GHPI Site 66-08-2796, temporary number FTX3-2.
25. Pages 60 - 62, GHPI Site 66-08-2836: The site is not defined in Figure 10, there are no site boundaries outlined. The site needs to be defined according to the National Park Service Standards, please indicate the site boundaries. The two components of this site need to be encircled into one large site and not two separate sites. Apparently this comment can be said for other sites such as GHPI Site 66-08-2843, etc. As many of these sites are in close proximity to others they may need to be incorporated into one large site as some sites are less than ten meters apart.
26. Page 90 - 91, GHPI Site 66-08-2849: The comments above are pertinent to this site, and some explanation of the barrel and bucket should be included in the write-up.
27. Page 100, line 12: The site definition here is for the previous site, apparently an accidental cut and paste error, however, it speaks volumes to the Quality Control of the documents submitted to our office by NAVFAC.

As we finish our initial review of the pre-draft plan we must ask was this document reviewed by anyone at NAVFAC before it was delivered to our office? If not perhaps some type of peer review can be set up with the National Park Service or the Advisory Council on Historic Preservation. We look forward to hearing back on our site avoidance suggestions and if so an updated draft plan for review. We ask that the document be peer reviewed before being sent to our office to save time on the review process and that the revised draft be accompanied by a letter outlining the changes made to the document for quick review.

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Carly, I opted to send Mr. Joseph's comments in hopes of resolving the concerns for the final report and officially accepting it.

Please let me know if this works with you.

Thank you.

Kind regards.

Lynda

--

**Más Fiet.**

Lynda

Lynda Bordallo Aguon, MPA  
(B.S. Anthropology, B.S. History)  
State Historic Preservation Officer  
Guam Historic Resources Division  
(State Historic Preservation Office)  
Department of Parks and Recreation  
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**Más Fiet.**

Lynda

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**Lynda B. Aguon** <lynda.aguon@dpr.guam.gov>  
To: John Mark Joseph <johnmark.joseph@dpr.guam.gov>

Wed, Dec 9, 2015 at 10:31 AM

Pls. Print for RC File.  
[Quoted text hidden]



John Mark Joseph &lt;johnmark.joseph@dpr.guam.gov&gt;

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**Letters from SHPO**

4 messages

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**Antone, Carly R CIV NAVFAC PAC, EV** <carly.antone@navy.mil>

Wed, Jul 12, 2017 at 4:02 AM

To: "John Mark Joseph (johnmark.joseph@dpr.guam.gov)" &lt;johnmark.joseph@dpr.guam.gov&gt;

Aloha John!

The first set of comments you sent to me for the Live Fire Training Range Complex Data Recovery Report references two letters you sent to the Navy: November 2015 and May 2016. Without more info, I've been unable to track these letters down. Do you have copies of these handy that you could email to me? I want to make sure we get this right and include the correct site numbers in the report. We're having the contractor work on these changes as we speak.

Your comment below, for reference:

Pages 3-39 through 3-43: Many of the previously recorded sites here are missing their GHPI Number even though they were issued on the same day as the numbers listed in November of 2015 and May of 2016. Other GHPI Numbers are labeled with incorrect Temporary Site numbers, please check your records as they do not match the numbers assigned to the designated sites. Due to time constraints we did not check them all, this has become a real quality control problem. Please, review our previous correspondences and make the proper corrections.

Thank you!

Carly R. Antone  
Archaeologist  
Naval Facilities Engineering Command, Pacific  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134  
Desk: (808) 472-1464

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 **smime.p7s**  
6K

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**John Mark Joseph** <johnmark.joseph@dpr.guam.gov>

Fri, Jul 14, 2017 at 8:19 AM

To: "Antone, Carly R CIV NAVFAC PAC, EV" &lt;carly.antone@navy.mil&gt;

Cc: "Lynda B. Aguon" &lt;lynda.aguon@dpr.guam.gov&gt;

Carly,

As soon as I finish my review, I'll see if I can scan copies of those letters and send them to you.

Virus-free. [www.avg.com](http://www.avg.com)

Gracias,

John Mark Joseph  
State Archaeologist, Guam  
490 Chalan Palasyo  
Agana Heights, GU 96910

In reply refer to:  
RC2012-10751

July 25, 2017

Ms. Carly Antone  
Environmental Planning Product Line  
NAVFAC Pacific, Code EV23  
258 Makalapa Drive, Suite 100  
Pearl Harbor, Hawaii 96860-3134

Subject: *Review of Draft Technical Report Archaeological Data Recovery in Support of Construction for MILCON P-715 Live Fire Training Range Complex, Andersen Air Force Base, Yigo, Guam*

Dear Ms. Antone,

We reviewed a portion of the subject documents submitted to our office, the brochure *Archaeology on the Northern Plateau of Guam* and 19 chapters of the *Draft Technical Report Archaeological Data Recovery in Support of Construction for MILCON P-715 Live Fire Training Range Complex, Andersen Air Force Base, Yigo, Guam*. We omitted chapter 18 due to time and we did not review the Guam Historic Properties Inventory site forms due to the enormous amount of comments made on the sites reviewed.

We are deeply concerned with the quality control problem still plagues NAVFAC as found throughout the subject document from basic methodology to reporting. It is our belief that no one has reviewed this document before it was sent to our office.

To end this time consuming first draft review, we request a record of individuals that have actually read the draft copy. Each individual who has reviewed a draft document needs to be listed with their signature and dated on an attached page on submittal to our office. Any submittal without Reviewer Page (Attachment 1) will automatically be rejected and not considered for review. The next draft submittal should provide this Reviewer Page and a letter or a matrix, first stating our comments with the correction made for quick review. Many sites were not fully defined in the field.

The revised maps provide boundaries of sites that are not fully tested or cleared, perhaps due to endangered flora and fauna in the area, although no explanation was provided. These sites need to be fully identified, and evaluated, before data recovery efforts can be made. This was noted in our previous letter concerning the preset data recovery efforts presented before the sites were fully defined or evaluated. Arbitrary boundaries cannot be used to define sites, clearly shown with GHPI site # 66-08-2731 on page 10-8 among others. Data recovery maps need to show the clustering of artifact along with the features on a separate map from all data gathered. The maps presented leave out the previously known information from the site, which should be pertinent to the overall site conclusions.

We have sent you the comprehensive listing of GHPI numbers assigned to the DoD and are attaching the matrix comments and the Reviewer Page, we look forward to a updated draft.

Reviews and comments by:



7/25/17

John Mark Joseph,  
State Archaeologist Guam

Cc. Shawn Arnold, Regional Cultural Resources Manager, NAVFAC Marianas.

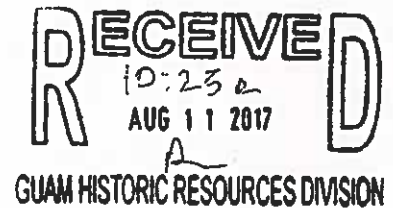


DEPARTMENT OF THE NAVY  
NAVAL FACILITIES ENGINEERING COMMAND MARIANAS  
PSC 455, BOX 195  
FPO AP 96540-2937

ATTACHMENT 15 (1)

5090  
Ser EV-17/734  
10 August 2017

Ms. Lynda Bordallo Aguon  
State Historic Preservation Officer  
Department of Parks & Recreation  
490 Chalan Palayso  
Agana Heights, Guam 96910



SUBJ: RC2012-10751 DRAFT ARCHAEOLOGICAL DATA RECOVERY IN SUPPORT OF  
CONSTRUCTION FOR MILCON P-715 LIVE FIRE TRAINING RANGE COMPLEX,  
ANDERSEN AIR FORCE BASE, YIGO, GUAM

Dear Ms. Aguon

Thank you for your comments dated July 25, 2017 on the subject report. We are in the process of addressing them and will provide comment matrix responses along with the final report.

In addition to report comments, your letter expressed concerns with the quality of the report and you requested that future submittals are accompanied by a sheet identifying the names of reviewers. We are not able to accommodate this request but would like to assure you that working drafts of reports are reviewed by several cultural resources personnel, including those based on Guam. Going forward, working drafts will incorporate longer review periods, whenever possible.

We agree that report quality should be addressed in order to minimize review efforts by both the Government and the SHPO. To this end, we will work closely with our contractors to emphasize the need for clarity, accuracy, and consistency in their reporting. We are committed to producing quality work and will do our best to meet your expectations.

We appreciate your diligence in review of this report, and we expect the final report and booklet to be completed in the near future. If you have any questions, please contact Mr. Ronnie Rogers at [ronnie.rogers@fe.navy.mil](mailto:ronnie.rogers@fe.navy.mil) of our Environmental Business Line or Ms. Carly Antone of NAVFAC Pacific at [carly.antone@navy.mil](mailto:carly.antone@navy.mil).

Sincerely,

John F. Salas  
By direction



DEPARTMENT OF THE NAVY  
NAVAL FACILITIES ENGINEERING COMMAND MARIANAS  
PSC 455, BOX 195  
FPO AP 96540-2937

IN REPLY REFER TO:  
5090  
Ser 00/267  
December 22, 2017

Ms. Lynda Bordallo Aguon  
State Historic Preservation Officer (SHPO)  
Guam Historic Resources Division  
490 Chalan Palasyo  
Agaña Heights, Guam 96910

Dear Ms. Aguon:

SUBJECT: STATE HISTORIC PRESERVATION OFFICER REQUEST FOR EXTENSION GRANTED TO COMPLETE REVIEW OF THE DRAFT TECHNICAL REPORT, ARCHAEOLOGICAL DATA RECOVERY IN SUPPORT OF THE J-001B UTILITIES AND SITE IMPROVEMENTS AT NAVAL BASE GUAM TELECOMMUNICATIONS SITE, GUAM (RC2014-0625)

The Department of the Navy (DoN) received your request for an extension of the comment period for review of the Draft Technical Report, *Archaeological Data Recovery in Support of the J-001B Utilities and Site Improvements at Naval Base Guam Telecommunications Site, Guam* and Draft Public Information Booklet, *Archaeology at North Finegayan, Guam*, both of which were delivered to your office on November 9, 2017 with comments due on December 23, 2017. The DoN acknowledges receipt of your December 18, 2017 email requesting for a sixty (60) day extension for the subject review and indicated that an amendment to the 2011 Programmatic Agreement should reflect a ninety (90) day review period for draft data recovery reports.

Regarding the SHPO's intent to amend data recovery report review period in the 2011 Programmatic Agreement (PA), the DoN is prepared to receive the proposed amendment through formal written correspondence. In accordance with stipulation XIV of the 2011 PA, we understand that consultation on proposed amendments must involve other PA Signatories.

After consideration of potential impacts to construction schedules as well as a review of other program risks, the DoN has decided to grant an extension of forty-five (45) days to February 6, 2018. This extension effectively provides a total of ninety (90) days for review. Please note that work will progress in areas outside of the archaeological sites currently under review. Based on current project schedules, the DoN does not expect to be able to further extend the review period beyond this date, as timely construction of the new Marine Corps base is critical to fulfilling international agreements between the Government of Japan and the United States. In accordance with stipulation IV.F.3.b of the 2011 PA, if we do not receive comments within the extended review period, we may be required to move forward with construction within sites that have undergone data recovery.

5090  
Ser 00/267  
December 21, 2017

The DoN recognizes that you have limited staff at this time to conduct reviews of Department of Defense (DoD) projects and a document of this scale is a significant addition to the workload of your office. To facilitate timely review of this draft report, please consider this submittal as the DoN's highest priority among other pending DoD reviews.

We appreciate your consideration and time in this matter. We are looking forward to receiving comments from the SHPO and will lend any assistance possible from our cultural resources management staff to facilitate expedited review. If you have any questions, please contact Mr. Ronnie Rogers, MCAG PWD Archaeologist, at 355-3230 or Mr. Shawn Arnold, Regional Cultural Resource Manager, at 349-1104.

Sincerely,



W. R. LEBEAU

By direction