



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) 475-6288
Parks Division: (671) 475-6291
Guam Historic Resources Division: (671) 475-6294/5
Facsimile: (671) 477-2822



William N. Reyes
Director
John P. Taitano
Deputy Director

September 26, 2017

Mr. John M. Fowler
Executive Director
Advisory Council on Historic Preservation
401 F Street NW, Suite, 308
Washington DC 20001-2637

Subject: *2011 Programmatic Agreement re. Military Relocation to the Island of Guam and the Commonwealth of the Northern Mariana Islands*

Request to Re-evaluate the Effects of the Live Fire Training Range Construction Project, MILCON P-715, Andersen Air Force Base, Island of Guam

Dear Director Fowler,

After reviewing documents regarding the Live Fire Training Range Complex (LFTRC) Project, it became evident that the "full" effects of this project on historic properties have not been thoroughly considered prior to the signing of the Record of Decision in 2015 - whether it be a reconnaissance level survey, an intensive level survey, or extensive archival background research.

The State Archaeologist, who primarily reviews projects of this magnitude related to the Military Relocation, provided me his comments justifying the re-evaluation. He believes the archaeological survey methodologies were flawed from the beginning and did not meet the reasonable and good faith effort established by the Advisory Council on Historic Preservation, nor were SHPO comments on the methodology considered. Mr. Joseph, further contends that:

- Background research was inadequate and lacking in many respects.
- Quality control of reports was an issue that eventually made for inefficient reviews.
- Project APE (Area of Potential Effect) maps from two sources did not match.
- Agreed upon mitigation measure was changed when it was found that a site that was to be avoided and preserved in place, was actually excavated causing its destruction.
- SHPO's request to conduct subsurface testing throughout the LFTRC APE was not considered in DOD's contract specifications. A systematic subsurface testing of the area would have determined the extent of sites and or discovery of cultural features.
- Sites, where data recovery occurred, were not fully exposed to determine the extent of the site.
- Sites in the LFTRC were not extensively identified, evaluated, or data recovered, therefore, the information gathered from these sites on the upper plateau do not show a

full depiction of what these sites may have represented on the landscape over a long period of time with regard to settlement and cultural practices of early inhabitants.

- Research on the post-World War II evolution of Andersen Air Force Base is inadequate.

Other reasons asserting our request for a re-evaluation:

- Human burials and human skeletal fragments were discovered in areas that were considered absent of burials.
- Lack of survey beyond the LFTRC APE boundaries that would extend down to the Ritidian Site.
- The lack of information regarding the full adverse effects of the Surface Danger Zone (SDZ) as it now stands, and the overall size of the land area and submerged land over Ritidian, Inapsan, Tarague, and Urunao.
- The lack of land surveys identifying the metes and bounds in terms of the size, acreage, and areas of lands and properties affected and impacted by the LFTRC APE. There is an implication, that there are Government of Guam properties in Andersen Air Force Base that have not been identified in any reports that have come across our office.
- Lack of clear understanding of the indigenous people's cultural, ancestral, and traditional rights to access archaeological sites and ancient villages, fishing and hunting areas, and access to natural resources. Such is the "Ritidian Site" – now under the control of both the Guam National Wildlife Refuge-U.S. Fish and Wildlife Service and the Department of Defense, through a Memorandum of Agreement, the site has not been comprehensively surveyed to "fully" determine the cumulative effects of the SDZ and the effects of its (Refuge) closure. We highly recommend for this survey to be executed.

Considering the points outlined, our request is not unreasonable. It is imperative, above all, that a re-evaluation is considered before the actual construction of the Live Fire Training Range Complex. This project must come to a "pause" until such time the re-evaluation is completed.

We know we can resolve issues and concerns raised by our offices and the people of Guam. Let us mutually agree, to do our utmost and very best to protect and preserve Guam's dwindling cultural and historic resources – resources that are essentially - the basis of our cultural heritage.

Sincerely,


Lynda Bordallo Aguon
State Historic Preservation Officer

Cc:

- Mr. William R. Manley, CNIC NAVFACHQ, Cultural Resources, Navy Deputy Federal Preservation Officer
- Dr. Thomas McCulloch, Assistant Director, Federal Property Management Section, Advisory Council on Historic Preservation
- Ms. Katherine R. Kerr, Program Analyst, Federal Property Management Section, Advisory Council on Historic Preservation