



Preserving America's Heritage

October 13, 2017

Ms. Lynda B. Aguon  
State Historic Preservation Officer  
Department of Parks and Recreation  
Government of Guam  
490 Chalan Palasyo  
Agana Heights, GU 96910

Ref: *Training Ranges Review and Analysis for the Proposed Live-Fire Training Range Complex in Support of Military Relocation to Guam and CNMI on Joint Region Marianas  
Joint Base Guam, Andersen Air Force Base, Guam  
ACHPConnect Log Number: 012077*

Dear Ms. Aguon:

The Advisory Council on Historic Preservation (ACHP) is in receipt of your September 26, 2017 letter requesting a re-evaluation of the potential effects of the Live Fire Training Range Complex (LFTRC) on historic properties pursuant to Section 106 of the National Historic Preservation Act. As you know, the LFTRC is one part of a larger suite of projects to support the military relocation to Guam, often referred to as the Guam Build Up, and the Section 106 review process for this project is stipulated by the *Programmatic Agreement Among the Department of Defense, the Advisory Council on Historic Preservation, the Guam State Historic Preservation Officer, and the Commonwealth of the Northern Mariana Islands State Historic Preservation Officer Regarding the Military Relocation to the Islands of Guam and Tinian* (2011 PA). We offer you as the Guam State Historic Preservation Office (SHPO) the following advice on how to pursue this request consistent with the terms of this PA.

In 2015, the Joint Guam Program Office issued a Training Range Review and Analysis (TRRA) document that presented information on the location, orientation, design, and operation of five alternatives for the LFTRC, with a specific focus on potential effects to historic properties and natural resources of cultural importance. This review and analysis was carried out in accordance with Stipulation V(C)(2) of the 2011 PA. The TRRA was developed over a three year period in consultation with the ACHP and your office. Also in 2015, the ACHP consulted with Joint Regions Marianas (JRM), Marine Corps Forces Pacific, the National Park Service's Pacific West Region, the Guam Preservation Trust, your office, and other consulting parties to develop and execute a Range Mitigation Plan, consistent with Stipulation V(C)(4) of the 2011 PA. This plan outlined measures to avoid, minimize, and mitigate adverse effects to historic properties and impacts to culturally important natural resources that may result from the construction and operation of the LFTRC.

In your letter, you state that the TRRA is inadequate for its purpose and intent and does not provide JRM with sufficient information on the full effects of the proposed project on historic properties. Therefore, you request that the construction of the LFTRC be "paused" in order for a "re-evaluation" to be completed. The ACHP appreciates your office's candor and willingness to reach out to us to consider your concerns. Recognizing that the 2011 PA governs the development of the TRRA and also provides measures for any signatory to object to the sufficiency of this or other related analyses, we would urge

ADVISORY COUNCIL ON HISTORIC PRESERVATION

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you to consider following the process outlined under Stipulation XIII, *Resolving Objections*, of the PA. The process allows signatories, invited signatories, and concurring parties to consult for up to 45 calendar days to resolve the objection.

Given that the start of construction on the LFTRC is imminent, the ACHP recommends that you direct your objection directly to JRM in accordance with Stipulation XIII. We recommend that you emphasize your office's view that the TRRA is inadequate and did not provide JRM with sufficient information to assess the effects of the project on historic properties. We also recommend that you discuss what your office finds inadequate with the TRRA and include those steps that you and the State Archaeologist believe must be taken by JRM to address those inadequacies.

We remain available to assist your office and JRM in addressing these issues and to provide our views should you wish to invoke Stipulation XIII. Should you have any questions or require additional assistance, please contact Ms. Katharine R. Kerr at (202) 517-0216 or by e-mail at [kkerr@achp.gov](mailto:kkerr@achp.gov) and reference the ACHPConnect Log Number above.

Sincerely,



Reid J. Nelson  
Director  
Office of Federal Agency Programs