



Senator

THERESE M. TERLAJE

I Mina'trentai Singko na Liheslaturan Guåhan

35th Guam Legislature

Committee on Health, Tourism, Historic Preservation, Land and Justice

May 24, 2019

Transmitted via Electronic Mail

governor@guam.gov

Honorable Lourdes A. Leon Guerrero

Governor of Guam

Ricardo J. Bordallo Complex

Adelup, Guam

Håfa adai Governor Leon Guerrero,

I am attaching a copy of a letter that was sent last year to former Governor Calvo after the 2018 Annual Programmatic Agreement (PA) Workshop. Senator Carlotta Leon Guerrero was given a copy of my letter to Governor Calvo previously.

I have attended this year's Annual PA Workshop meetings and all of these concerns still apply. I am respectfully requesting your immediate assistance in ensuring our historic properties are preserved in place, particular those in the construction area adjacent to Ritidian.

Sincerely,

Therese M. Terlaje

CC: Tony Babauta, Office of the Governor, Chief of Staff

Attachments

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OFFICE OF THE VICE SPEAKER
THERESE M. TERLAJE
Chairperson of the Committee
On Culture and Justice

I Mina'trentai Kuåttro na Liheslaturan Guåhan
34th Guam Legislature

Transmitted via Electronic Mail

governor@guam.gov

May 24, 2018

Honorable Eddie Baza Calvo

Governor of Guam Ricardo J. Bordallo Complex
Adelup, Guam

RE: 6th Annual Guam Programmatic Agreement Workshop and Issues with the PA

Håfa Adai Governor Calvo,

I write to you with concern about the Programmatic Agreement (PA), which as you know, controls how the Department of Defense will behave in regard to historic sites in the buildup. Not all of the achievements predicted when signing the Programmatic Agreement have come to fulfillment and the process has become a monumental and overwhelmingly burdensome task for our State Historic Preservation Officer (SHPO), who is the sole entity charged with protecting historic properties for all the people of Guam. The Record of Decision (ROD) made very clear that there are severe impacts on historic sites and environmental resources at both the Cantonment area and the Live Fire Training Range (LFTRC) area. Moreover, when the PA was signed, the Live Fire Training Range location had not been decided, and our SHPO did not believe that the Northwest Field location, which impacts Ritidian/Litekyan, was on the table. Furthermore, the Record of Decision regarding the LFTRC and the location of the Cantonment area had not been issued. Since the Record of Decision for the LFTRC was announced, the SHPO has discovered historic properties at the site that were not considered by the Department of Navy and is in the process of asking for reconsideration. There are over 100 historic sites at Northwest Field, and 14 of these sites have not been avoided and instead a sampling of important ancient artifacts has been removed and stored, and therefore will not be left in place in order to preserve historical context for future generations of Guam. Any artifacts or historic materials not removed from the site are left to the disposal of the contractor.

In her letter to the Advisory Council on Historic Properties (ACHP) received on Sept 26, 2017, the Guam SHPO requested that the construction of the LFTRC be “paused” noting that the Guam Training Range Review and Analysis report (TRRA) did not provide sufficient information on the full effects of the proposed project on historic properties. The ACHP urged the SHPO to process objections as outlined under Stipulation XIII of the PA. The stipulation allows for signatories, invited signatories, and concurring parties of the PA to “consult” for up to 45 calendar days to resolve the objection.

Today, SHPO’s concerns remain unresolved and she presented a letter to all signatories to support the State Archaeologist’s objections to actions carried out in the implementation of the Programmatic Agreement and relative to several military projects including the LFTRC,

the Main Cantonment (Marine Base, Finegayan), the Anderson South Training Complex, and the Water Well Development and Construction projects on Andersen Air Force Base. Please see the attached May 24, 2018 letter from SHPO. The State Archaeologist noted concerns about the adequacy of sampling relative to the scope of historic properties. At today's PA Annual workshop, it was further discussed that data recovery is only a representative sample of a site. Once data recovery is completed, the rest of the site is left to the discretion of the contractor. A representative of JRM also noted that they are wary of the cost of curation for artifacts that they retrieve and stated, "If we pick something up, we are required to curate it."

Also, the PA has not allowed the SHPO to stop projects when an historical site will be affected. The SHPO has stated that the 45-day period for review and consultation for projects is insufficient and has made requests for at least three extensions on one project. Her third and most recent request to extend the consultation period for the J-001B project (Finegayan) was declined and DOD proceeded with the project. Furthermore, according to the Department of Defense's interpretation of the PA, as they stated in minutes from last year's Annual Workshop for CY2016 on April 27, 2017, "any eligible sites are being fully data recovered, not nominated, as the buildup requires disturbance of the area for construction."

Likewise, a PA Memo for Project J-755 (Urban Combat Training Project, Anderson South) published in February of this year by the Naval Facilities Engineering Command and the Marine Corps activity Guam Public Works Department indicated that a project of the Department of Defense, "Does not require approval from SHPO or other consulting party; does not require the identification of every historic property within the area of potential effect (APE); does not require investigations outside of or beneath a properly documented APE; and does not require ground verification for the entire APE." Furthermore, the same document stated that DOD is not required to identify 100% of the sites in the APE and that 100% of the land area of the APE does not have to be covered."

In addition, many of the promises of the PA have yet to come to fruition, including the promise for a new museum complex. The Programmatic Agreement has identified the entire islands of Guam and Tinian as the Area of Potential Effect for cumulative effects on historic properties, and specifies a provision for a 20,000 square foot curation facility as well as a museum complex to the Government of Guam as part of DOD's mitigation measures. The dedication of a site for the repository recently took place, but it is still not built, ten years after the PA promised it would be built. As to the promise that the Department of Defense would advocate for the construction of a new museum complex, today an Executive Summary from the Department of the Navy was discussed in which they confirmed that "no federal agencies had additional Congressional authority or discretionary funds to support the construction of the Guam Museum." Please see the attached summary.

It is evident that access to historic sites on bases continues to be highly restricted, despite the Public Access plan that has recently been implemented. The plan was promised with the PA and now may have resulted in more restricted access to historic sites on bases including Haputo and areas at Orote Point.

I maintain that impacts to historic properties should be avoided, that the sites, artifacts, and burials should remain in context, and that the PA has proven not to be fully effective in this regard. Projects should not proceed without final consensus and explicit approval by Guam SHPO. I object to the DON's decision to disregard the SHPO's recommendations, which undermines the people of Guam and further provokes public skepticism and mistrust of DOD activities and their effects on historic sites.

Additionally, the PA process does not adequately consider environmental issues that are now upon us from the combined clearing of vegetation along with the deposit of materials over the Northern Guam Lens Aquifer. The Northern Guam Lens Aquifer is a precious resource that must be protected. Rehabilitation of the aquifer and habitat is not a viable option if we fail to protect it.

I would like to reiterate my points from a letter I sent you on September 5, 2017 and attached, in which I discussed the Final SEIS, the Biological Opinion, and other documents which outline the clearing of a total of 1,219 acres of limestone forest habitat, including the clearing of 187 acres of limestone forest habitat at Northwest Field, the clearing of 212 acres of limestone forest habitat for the hand grenade range, urban terrain training area and other activities at Andy South, the clearing of 12 acres of limestone forest habitat for well fields and water system at AAFB, and the further clearing of 683 acres of limestone forest for the cantonment at Finegayan.

The Biological Opinion (BO) also discusses the significant adverse effects on endangered or threatened species from the proposed destruction of habitat, especially the limestone forest habitat. It states that of the 23 endangered or threatened species located in Micronesia, 13 were found to occur adjacent to or within the proposed project areas. In particular, the BO, regarding the Live-Fire Training Range at Ritidian Point and the effects on the Guam National Wildlife Refuge states:

"The largest effects on listed species habitat in terms of habitat fragmentation will be on AAFB near Ritidian Point from construction of the LFTRC. This area currently contains a large expanse (over 350 ac {142 ha}) of high-quality primary limestone forest that serves as occupied habitat for the Mariana fruit bat, Mariana eight spot butterfly, B. guamense, D. guamense, Tuberculabium guamense, C. micronesica, H. longipetiolata, and T. rotensis, and unoccupied habitat for the Guam tree snail, fragile tree snail, and humped tree snail (DON 2017a, p. 44). This primary limestone forest is also contiguous with GNWR, providing an even larger forested area serving as habitat for the above eleven listed species. In total, approximately 78 ac (32 ha) of primary limestone forest and 109 ac (44 ha) of secondary limestone forest would be permanently cleared for construction of the LFTRC.

In addition to LFTRC clearing activities, the proposed action will create a Surface Danger Zone (SDZ) over approximately 68 percent of the GNWR at Ritidian Point during operation of the LFTRC. The SDZ will cover the GNWR access road, visitor center, offices, and other facilities and thereby limit access to the GNWR while firing occurs at the LFTRC. Any entry into GNWR will require scheduling with and approval by LFTRC Range Control personnel. The limited access that GNWR staff will have to the refuge property during the estimated 39 weeks per year the LFTRC is active will limit the amount of habitat management that can occur at the GNWR. This could have an

adverse effect on listed species by: 1) limiting maintenance of the predator exclusion fence at the GNWR, 2) limiting maintenance of native out-plantings, 3) limiting invasive plant control, and 4) limiting effective ungulate control. Per Section 2822 (Establishment of surface danger zone, Ritidian Unit, GNWR) in the 2015 National Defense Authorization Act, the Service and the DON may enter into an agreement to establish and operate a SDZ over the GNWR. The agreement may include relocation and reconstruction of GNWR facilities, mitigation for impacts to wildlife species, and use of DoD personnel to complete GNWR conservation actions; however, this agreement is not yet in place. Therefore, in this analysis we assume that the operation of the LFTRC will have an adverse effect on listed species by preventing the management, research, and monitoring that would have otherwise occurred at GNWR.”


While Guam suffers the adverse environmental and historic impacts from buildup projects, litigation continues via a lawsuit filed in the CNMI by the Tinian Women’s Association and others, the District Court is considering whether the Record of Decision for the military buildup should have included the training ranges required throughout the Marianas, instead of dividing these “required” training ranges for the marines being relocated to Guam into a different CJMT EIS and ROD process. A decision on that case is still pending.

I respectfully request again that you address these concerns and pause clearing and construction where it will adversely impact historic properties until our SHPO’s concerns can be fully addressed, and that avoidance of destruction of 1,219 acres of limestone forest habitat can be accomplished.

I stand ready to discuss and assist in the best strategy for Guam that will bring justice to our history and that will naturally unite and not further divide our people.

Si Yu’os Ma’åse yan Saina Ma’åse.

Best regards,



Therese Terlaje
Vice Speaker

Attachments:

- Executive Summary Memorandum, Department of the Navy, April 16, 2018
- SHPO Letter to Signatories Regarding Stipulation XIII- Resolving Objections, May 24, 2018 with attachments
 - o SHPO letter to ACHP, September 26, 2017
 - o ACHP response to SHPO, October 13, 2017
- Letter from Vice Speaker Terlaje to the Governor, September 5, 2017
 - o Factsheet for Letter to the Governor, September 5, 2017
- Annual Workshop Minutes for CY2016, April 27, 2017
- PA Memo for Project J-755, February 2018



EXECUTIVE SUMMARY MEMORANDUM



Prepared for: Parties to the 2011 Programmatic Agreement

Prepared by: William R. Manley, Deputy Federal Preservation Officer, US Navy; and Gary Kuwabara, Western Regional Office Director, Department of Defense Office of Economic Adjustment

Date: April 16, 2018

Subject: Department of Defense outreach to other federal agencies to fund a complete museum complex on Guam

Summary: In the 2011 Programmatic Agreement for Military Relocation to Guam and the Commonwealth of the Northern Mariana Islands (2011 PA), the Department of Defense (DoD) committed to advocate to other Federal agencies to fund a complete museum complex on Guam. After extensive coordination with sister agencies and Congress, DoD confirmed that no other agencies had authority or appropriation to fund construction of the museum.

Background:

- DoD commitments in the 2011 PA under Stipulations VII.C.4.A and B:
 - Support the recommendation of the President's Economic Adjustment Committee (EAC) for construction of a curation facility to provide critically needed curation capacity to the Government of Guam.
 - Advocate for other Federal agencies to fund a complete museum complex on Guam to house and display Guam's unique cultural artifacts for the public's benefit.
- Executive Order 12788 established the Defense Economic Adjustment Program (DEAP) to work with affected states and communities when their needs are beyond the capacities of DoD. The EAC comprises all federal departments and agencies, and its mission is to assist DoD's efforts on behalf of respective jurisdictions.
- As part of the EAC, the Secretary of Defense chairs the EAC, and the Secretaries of the U.S. Department of Labor and Commerce serve as co-vice chairs.
- The director of DoD's OEA serves as the executive director, and the EAC receives staff support from the OEA.

Discussion:

- Specific to the Guam military relocation effort, the EAC Federal Team comprised the DoD and Departments of Agriculture, Defense, Education, Interior, Justice, Health and Human Services, and Housing and Urban Development, as well as the Environmental Protection Agency, Office of Management and Budget and the Council on Environmental Quality.
- The EAC Federal Team coordinated and collaborated extensively with other Federal agencies, as well as the Governor of Guam and Guam executive departments (GovGuam) in the evaluation of the projects identified by GovGuam as necessary adjustments in Guam's local public infrastructure to support the Marine Corps relocation from Okinawa, Japan to Guam.
- In coordination with GovGuam, the EAC Federal Team evaluated all projects identified by GovGuam as necessary adjustments in Guam's local public infrastructure to support the military relocation.
- The EAC Federal Team refined the list of projects to those that would address the mitigation necessary for the significant impacts identified in the Department of the Navy's 2015 Final Supplemental Environmental Impact Statement Guam and Commonwealth of the Northern Mariana Islands Military Relocation (2012 Roadmap Adjustments). The list included the Guam Cultural Repository.
- As part of the EAC Federal Team review, DoD efforts and advocacy for other federal agencies to support construction of the Guam Museum confirmed that no federal agencies had additional Congressional authority or discretionary funds to support construction of the Guam Museum.
- In FY2017, after extensive coordination with Congressional leaders, the EAC Federal Team was finally successful in obtaining Congressional authorization and appropriation to fund construction of the Guam Cultural Repository, a facility to provide critical support for the Guam Museum.

Recommendation:

- For information only.



Eddie B. Calvo
Governor
Ray Tenorio
Lt. Governor

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

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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, 94th 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 19th and 20th-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 19th and 20th-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 mentioned 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 19th early 20th 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 <johnmark.joseph@dpr.guam.gov>

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

--

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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[Quoted text hidden]

2 attachments

 **GHPO_Comment_Matrix_Mod_2_WP.pdf**
161K

 **smime.p7s**
6K



Eddie Baza Calvo
Governor

Ray Tenorio
Lt. Governor

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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

GHPI Site Number	Temporary Site Number	Period (Historic Context) and Site Type	NAVFAC NRHP Eligible	SHPO Concurrence on NR Eligibility
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

GHPI Site Number	Temporary Site Number	Period (Historic Context) and Site Type	NAVFAC NRHP Eligible	SHPO Concurrence
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

GHPI Site Number	Temporary Site Number	Period (Historic Context) and Site Type	NAVFAC NRHP Eligible	SHPO Concurrence
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:

GHPI Site Number	Period (Historic Context) and Site Type	NHPR Eligible	NRHP Criteria
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

GHPI Site Number	Period (Historic Context) and Site Type	NHPR Eligible	NRHP Criteria
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 <johnmark.joseph@dpr.guam.gov>

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**
 18K

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.

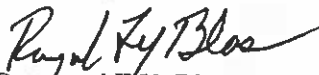
In reviewing the MILCON P101 project, this site is nowhere near the APE for Site 66-08-2305 or the PA Memo J001B project. Our records show no mitigation has been completed or that the Guam Historic Property Inventory (GHPI) Data Form was submitted to our office for this site. There are many unanswered 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.

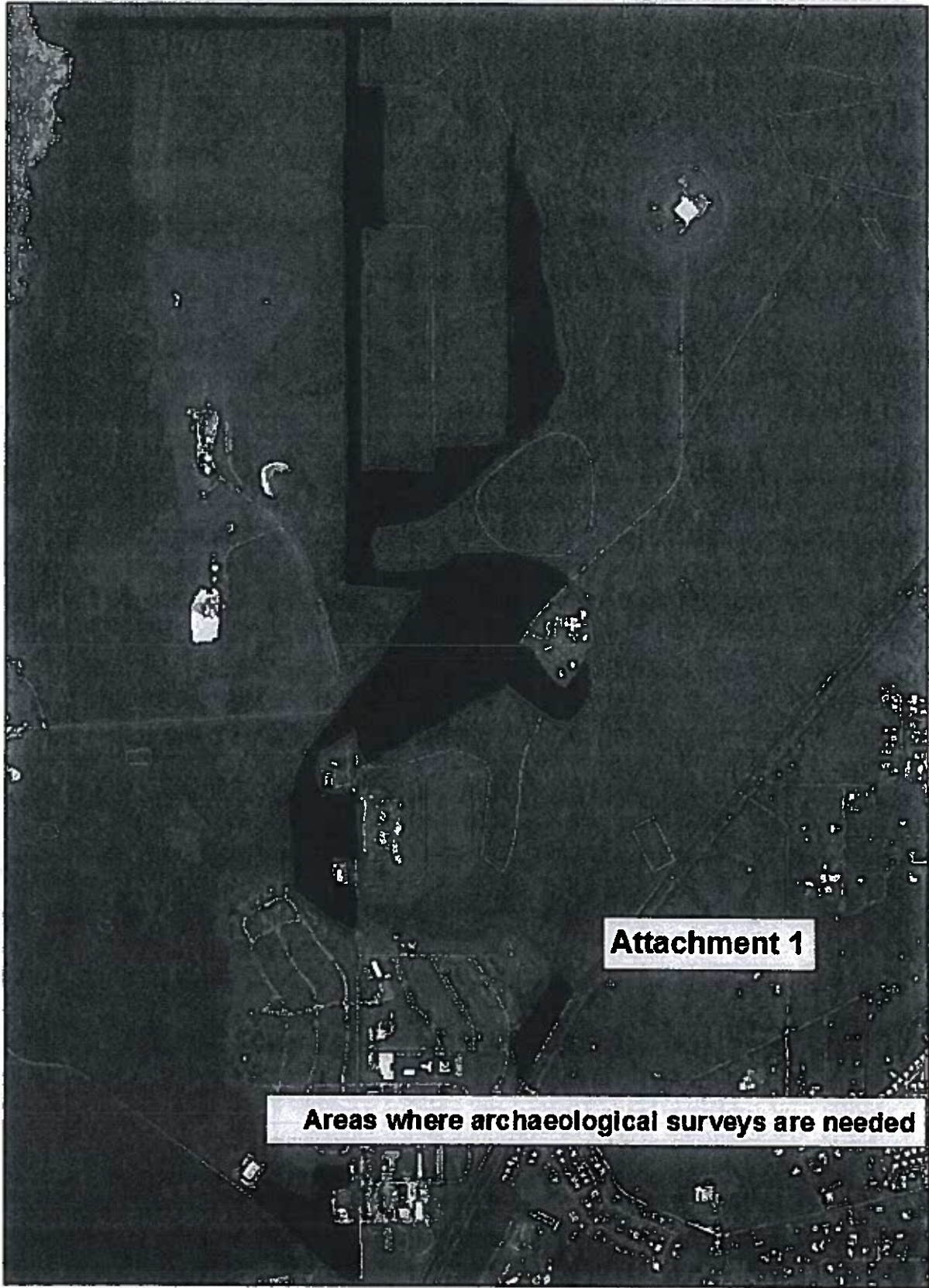
Should you have any questions after a review of this letter please contact our office.

Sincerely,


Raymond F.Y. Blas
Director

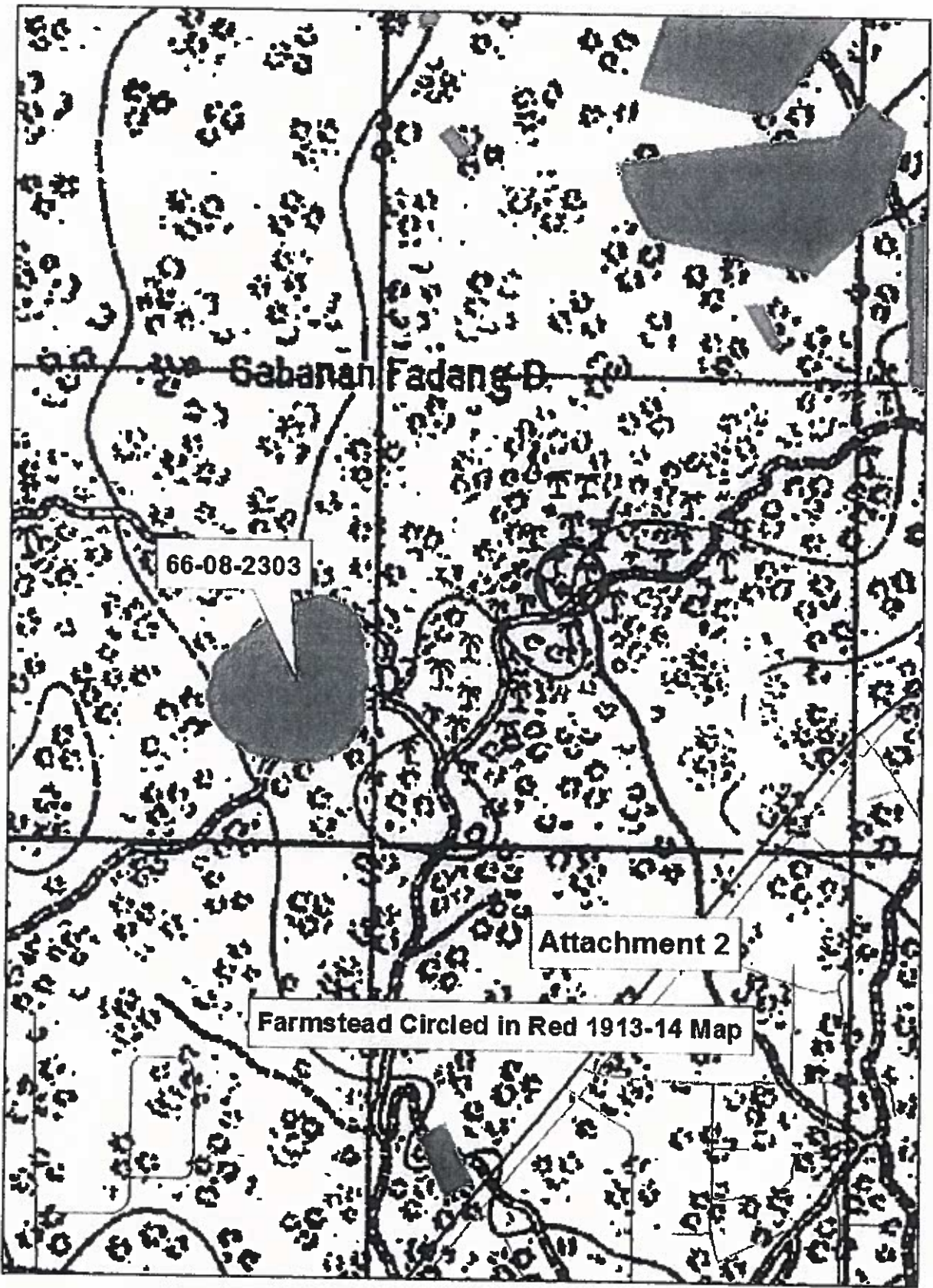

Lynda Bordallo Aguon
State Historic Preservation Officer

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

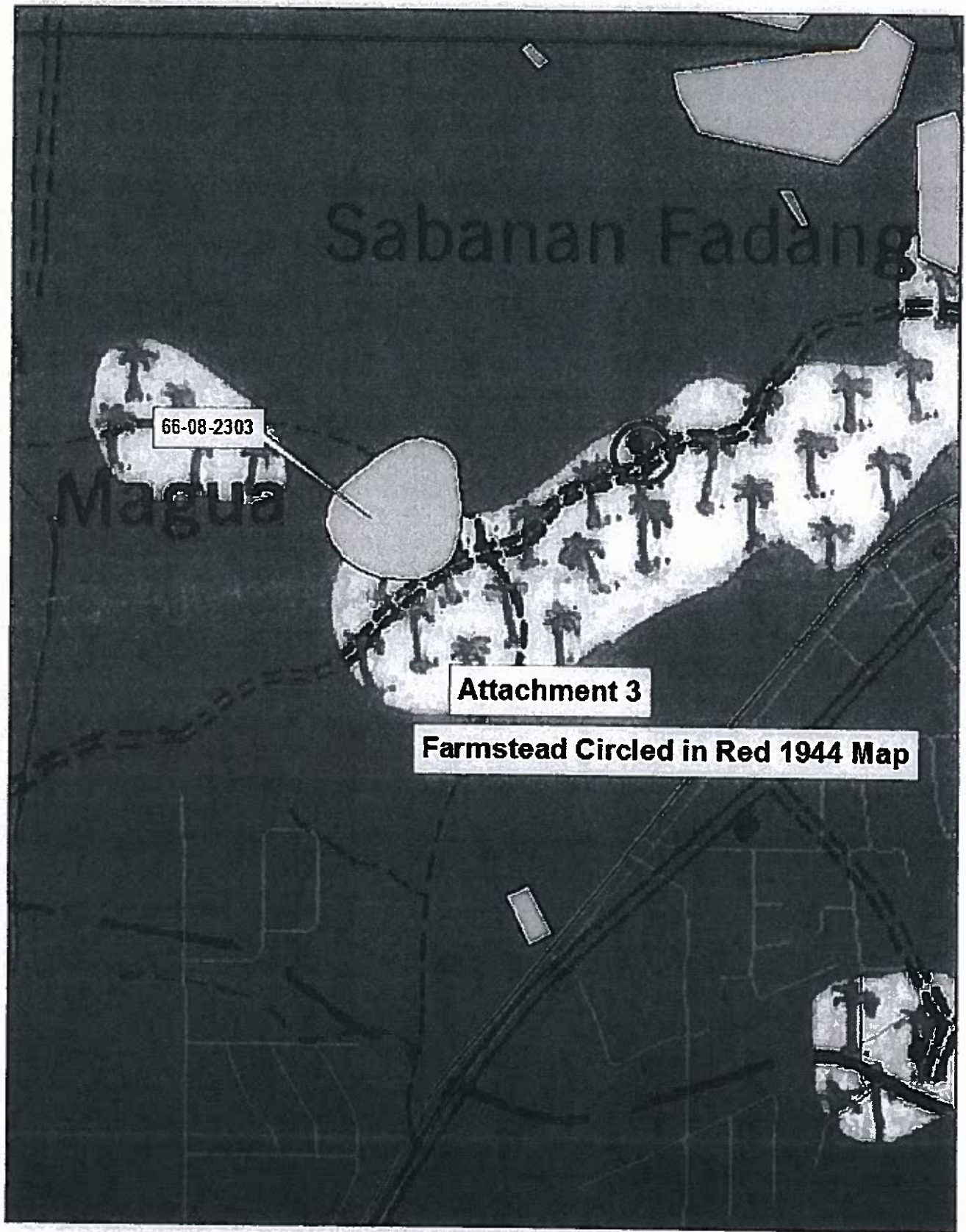
Sabanan Fadang

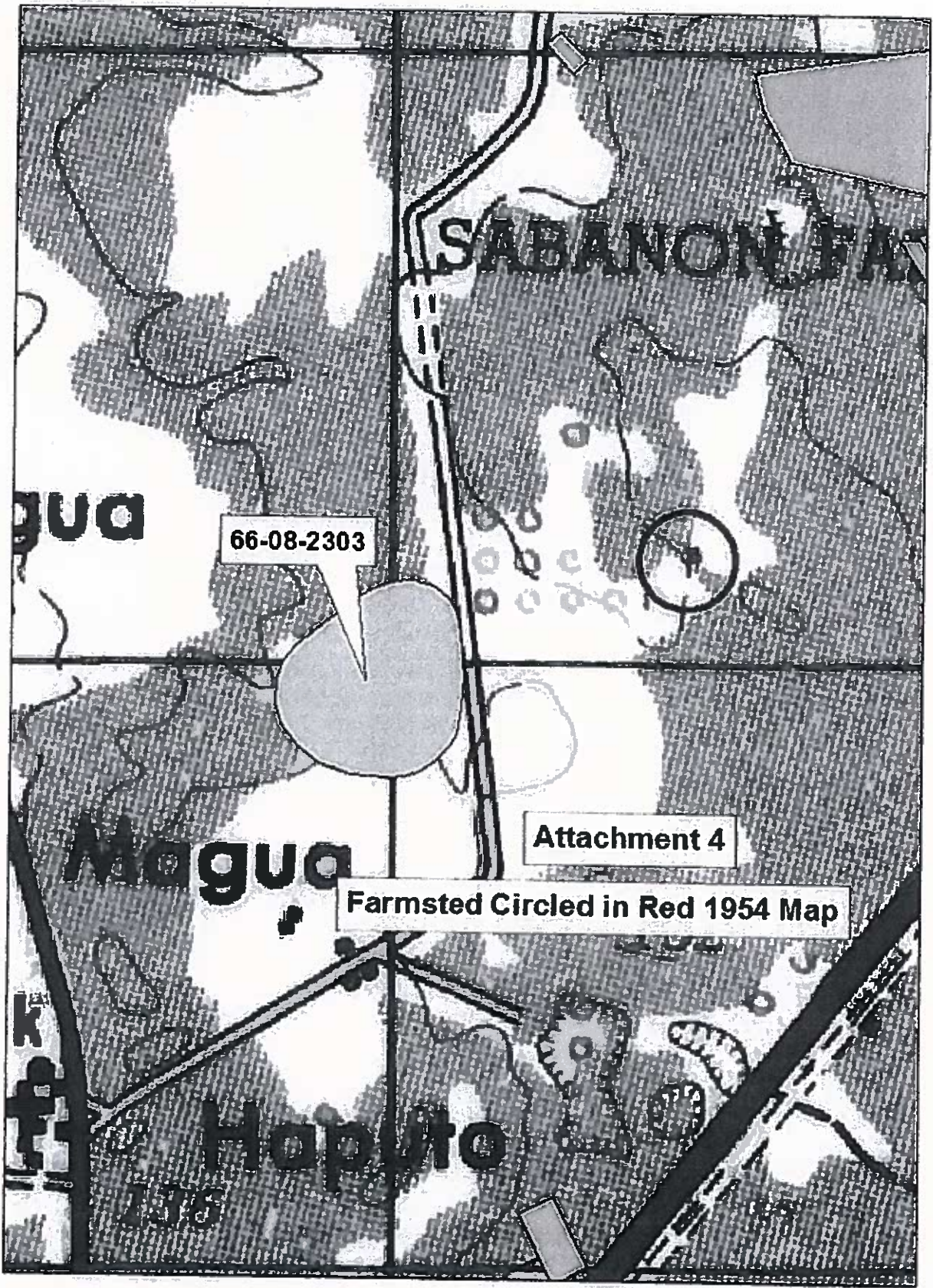
66-08-2303

Magua

Attachment 3

Farmstead Circled in Red 1944 Map





SABANON FARM

gua

66-08-2303

Magua

Attachment 4

Farmsted Circled in Red 1954 Map

k
ff

Hapito



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

Comments on SEIS 2nd Revision

1 message

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
490 Chalan Palasyo, Agana Heights, 96910
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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:

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
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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 19th and early 20th centuries as part of their Section 106 responsibility. It is apparent, along with the architectural studies that were called for in the previous reports, that these needed to be completed before any determination can be considered.

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

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.

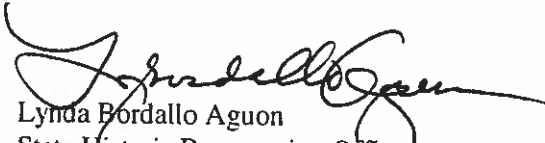
Considering the methodology, limited survey sampling, the ambiguity of the written record, and the absence of consideration for known property types that may be eligible for listing on the NRHP, including not finding previously known sites, the identification and evaluation efforts of MCAG do not meet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

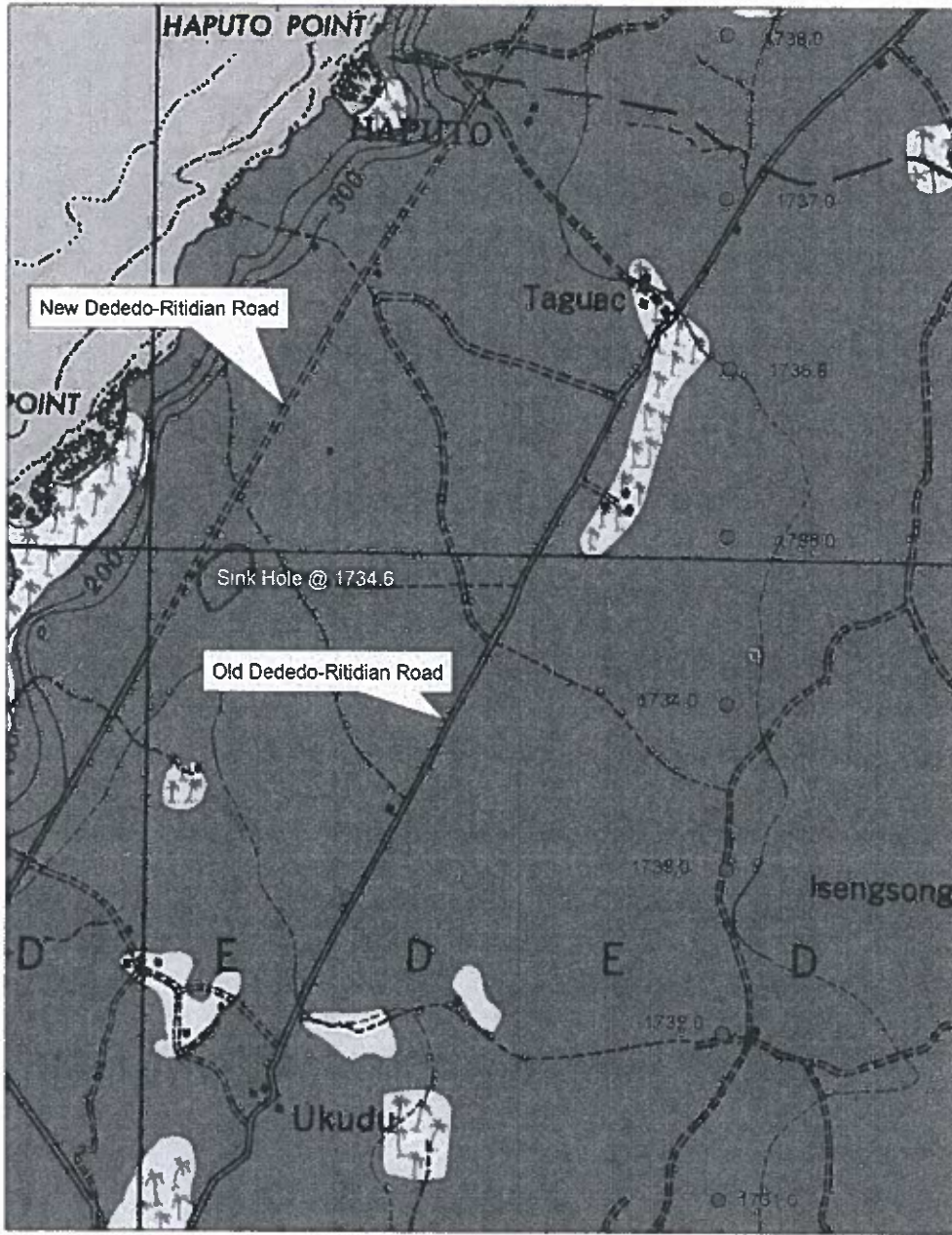
The road is constructed to main road standards, with a surfaced width of at least 36'. It is straight for perhaps 1000' after leaving the main road but then turns on a wide radius to the left, then ascending at a relatively easy grade (not more than 6%). The final 3/8 mile of this roadway lies in extremely 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

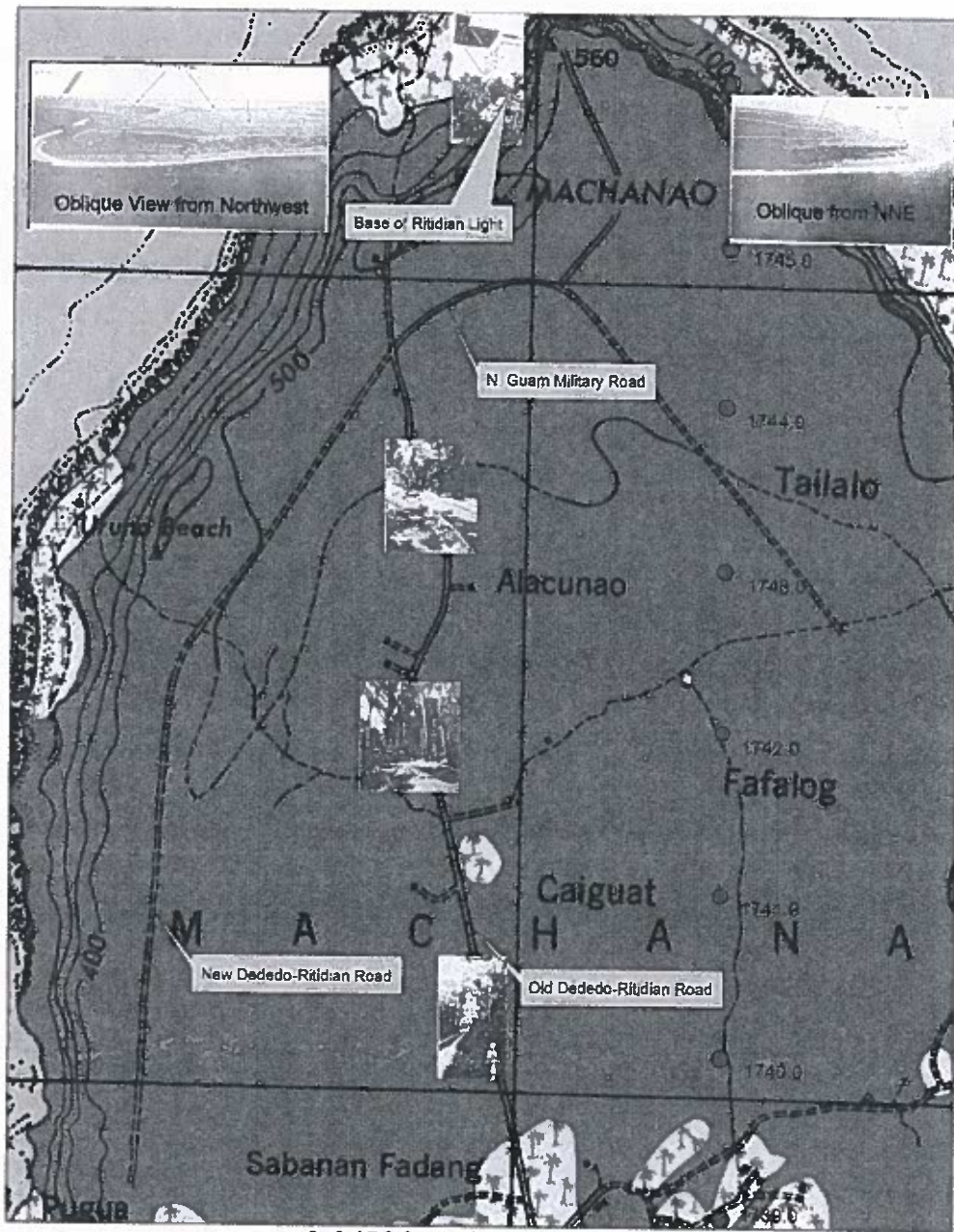


0 0.15 0.3 0.6 0.9 1.2 Miles

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



Dededo-Ritidian Roads

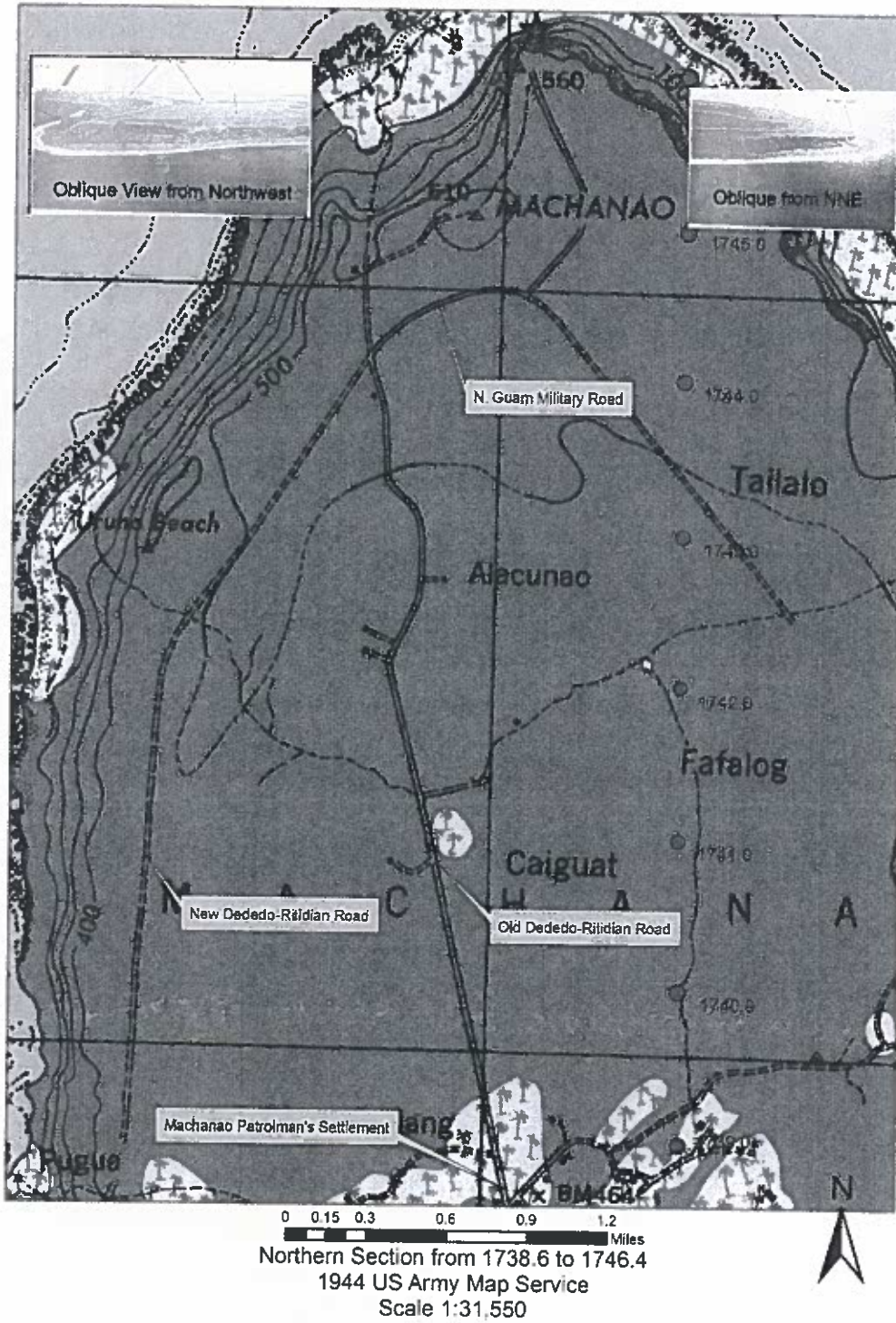


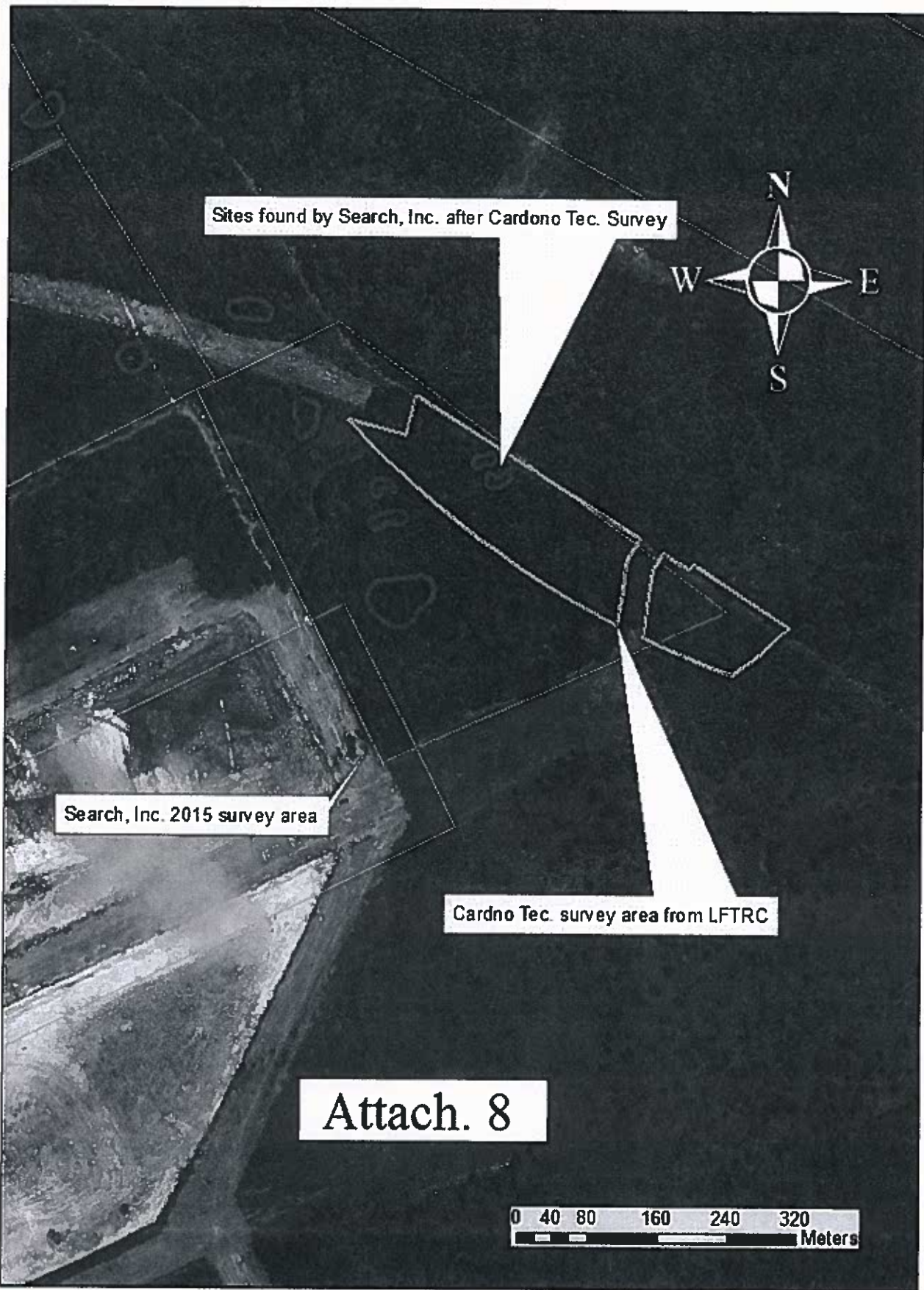
0 0.150.3 0.6 0.9 1.2 Miles

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



Dededo-Ritidian Roads





Sites found by Search, Inc. after Cardono Tec. Survey

Search, Inc. 2015 survey area

Cardno Tec. survey area from LFTRC

Attach. 8

0 40 80 160 240 320
Meters

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



new discovery

Ronnie.Rogers@fe.navy.mil <Ronnie.Rogers@fe.navy.mil>

Tue, Mar 20, 2018 at 2:32 PM

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

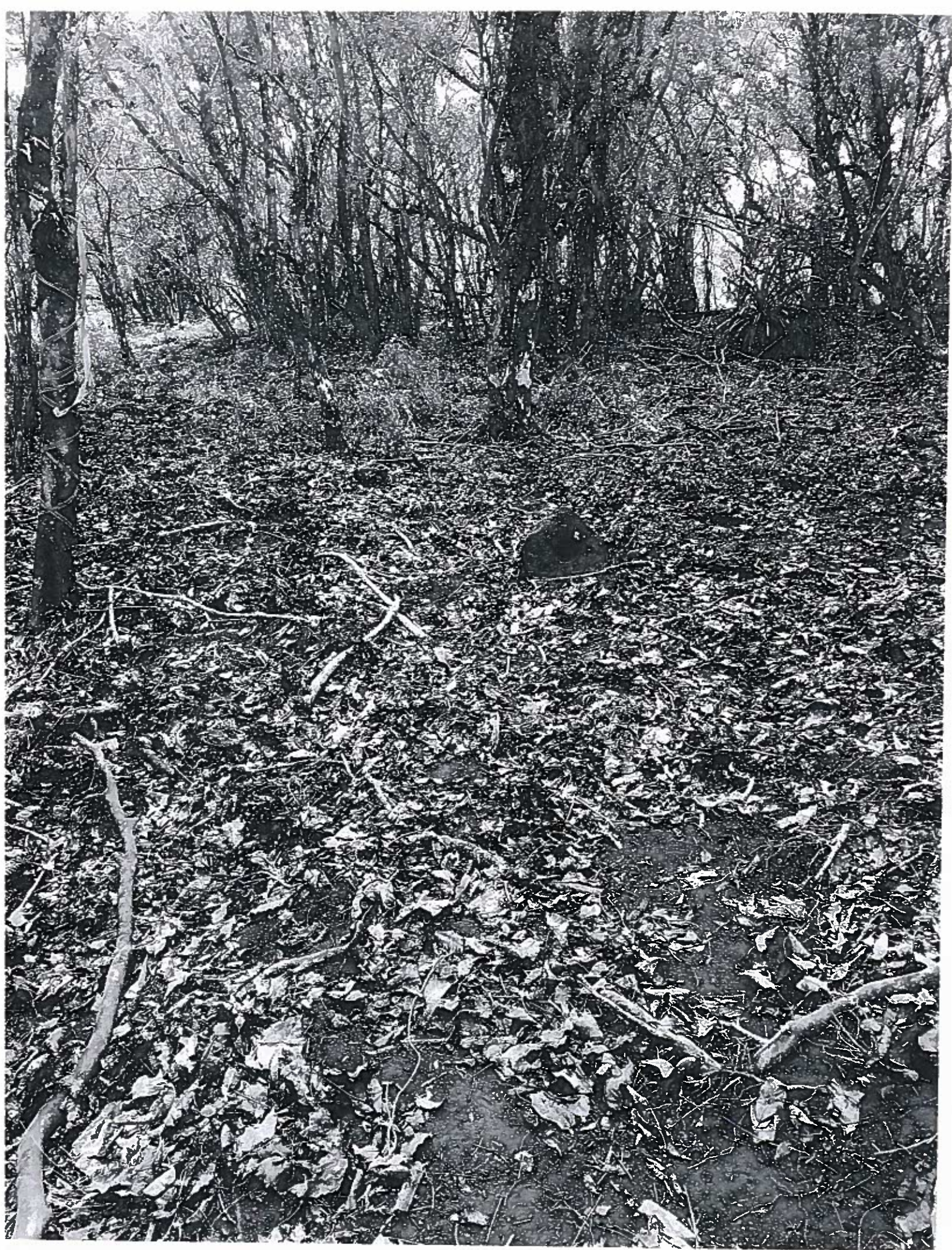
Cc: Albert.Borja@fe.navy.mil, William.Arnold@fe.navy.mil, Lon.Bulgrin@fe.navy.mil, Sandra.Yee@fe.navy.mil

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

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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.

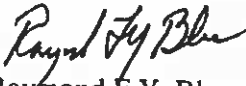
2. Volume II, Site Description Site T-RIT-001: In reviewing the data presented, it is apparent that the site is part of the Pajon Point Site (66-08-0013) recorded by Fred Reinman in 1966. This site is listed on the Guam Register of Historic Places, and is eligible for the National Register. Thus, the 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.

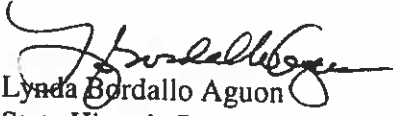
9. Site Numbers have been assigned to the remainder of the T-TA- (sites) please see the table below:

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 <johnmark.joseph@dpr.guam.gov>

(no subject)

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

Wed, Aug 20, 2014 at 4:27 PM

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

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

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, 20th 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 20th 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.

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

Lynda Bordallo Aguon, MPA
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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 <johnmark.joseph@dpr.guam.gov>

Letters from SHPO

4 messages

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)" <johnmark.joseph@dpr.guam.gov>

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

 **smime.p7s**
6K

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

Fri, Jul 14, 2017 at 8:19 AM

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

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

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

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.

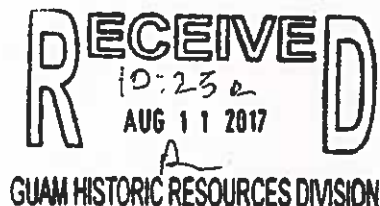


DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND MARIANAS
PSC 455, BOX 195
FPO AP 96540-2937

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 of our Environmental Business Line or Ms. Carly Antone of NAVFAC Pacific at 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



Eddie B. Calvo
Governor
Ray Tenorio
Lt. Governor

Department of Parks and Recreation
Government of Guam
490 Chalan Palasyo, Agana Heights, Guam 96910
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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



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 and reference the ACHPConnect Log Number above.

Sincerely,



Reid J. Nelson
Director
Office of Federal Agency Programs



OFFICE OF THE VICE SPEAKER
THERESE M. TERLAJE
Chairperson of the Committee
On Culture and Justice

I Mina'trentai Kuåttro na Liheslaturan Guåhan
34th Guam Legislature

Transmitted via Electronic Mail
governor@guam.gov

September 5, 2017

Honorable Eddie Baza Calvo
Governor of Guam
Ricardo J. Bordallo Complex
Adelup, Guam

RE: Urgent issues requiring resolution prior to construction of the Live-Fire Training Range Complex at Northwest Field

Håfa adai Governor Calvo,

I write to you with great concern regarding the preservation of Guam's ancient villages and historic resources at Northwest Field, Ritidian, Litekyan Point, and adjacent properties that will be impacted by the military's plans to build a Live-Fire Training Range Complex.

Since the Programmatic Agreement (PA) as to historic properties was entered into, it has been pointed out that the military's promises for a museum and for a cultural repository have not been completed, yet the projects continue to be processed. Avoidance is spelled out as a priority in the PA, but in the case of the live-fire training range and many other projects, the military has declared itself unable to avoid the impacts to historic properties and the environment. Due to the foreseen impacts to the ancient village and to the limestone forest, Litekyan/Ritidian was deemed the least suitable and most harmful alternative at the time the PA was signed, and the ancient village at Pågat was removed from the list of alternatives. The Principal Deputy Assistant of Secretary of the Navy (Energy, Installations and Environment), alone, signed the August 2015 Record of Decision without consent of the government or people of Guam.

Since the Record of Decision for the Final SEIS regarding historic properties was announced, the SHPO has discovered historic properties that were not considered by the Department of Navy when the Record of Decision to locate the live-fire training range at Northwest Field was made and is in the process of asking for reconsideration.

In a lawsuit filed in the CNMI by the Tinian Women's Association and others, the District Court is considering whether the Record of Decision for the military buildup should have included the training ranges required throughout the Marianas, instead of dividing these "required" training ranges for the marines being relocated to Guam into a different CJMT EIS and ROD process. A decision on that case is still pending.

The Final SEIS, the Biological Opinion, and other documents outline the clearing of a total of 1,219 acres of limestone forest habitat, including the clearing of 187 acres of limestone forest habitat at Northwest Field, the clearing of 212 acres of limestone forest habitat for the hand grenade range, urban terrain training area and other activities at Andy South, the clearing of 12 acres of limestone forest habitat for well fields and water system at AAFB, and the further clearing of 683 acres of limestone forest for cantonment at Finegayan.

The Biological Opinion (BO) also discusses the significant adverse effects on endangered or threatened species from the proposed destruction of habitat, especially the limestone forest habitat. It states that of the 23 endangered or threatened species located in Micronesia, 13 were found to occur adjacent to or within the proposed project areas. In particular, the BO, regarding the Live-Fire Training Range at Ritidian Point and the effects on the Guam National Wildlife Refuge states:

"The largest effects on listed species habitat in terms of habitat fragmentation will be on AAFB near Ritidian Point from construction of the LFTRC. This area currently contains a large expanse (over 350 ac {142 ha}) of high-quality primary limestone forest that serves as occupied habitat for the Mariana fruit bat, Mariana eight spot butterfly, B. guamense, D. guamense, Tuberculabium guamense, C. micronesica, H. longipetiolata, and T. rotensis, and unoccupied habitat for the Guam tree snail, fragile tree snail, and humped tree snail (DON 2017a, p. 44). This primary limestone forest is also contiguous with GNWR, providing an even larger forested area serving as habitat for the above eleven listed species. In total, approximately 78 ac (32 ha) of primary limestone forest and 109 ac (44 ha) of secondary limestone forest would be permanently cleared for construction of the LFTRC.

In addition to LFTRC clearing activities, the proposed action will create a Surface Danger Zone (SDZ) over approximately 68 percent of the GNWR at Ritidian Point during operation of the LFTRC. The SDZ will cover the GNWR access road, visitor center, offices, and other facilities and thereby limit access to

the GNWR while firing occurs at the LFTRC. Any entry into GNWR will require scheduling with and approval by LFTRC Range Control personnel. The limited access that GNWR staff will have to the refuge property during the estimated 39 weeks per year the LFTRC is active will limit the amount of habitat management that can occur at the GNWR. This could have an adverse effect on listed species by: 1) limiting maintenance of the predator exclusion fence at the GNWR, 2) limiting maintenance of native out-plantings, 3) limiting invasive plant control, and 4) limiting effective ungulate control. Per Section 2822 (Establishment of surface danger zone, Ritidian Unit, GNWR) in the 2015 National Defense Authorization Act, the Service and the DON may enter into an agreement to establish and operate a SDZ over the GNWR. The agreement may include relocation and reconstruction of GNWR facilities, mitigation for impacts to wildlife species, and use of DoD personnel to complete GNWR conservation actions; however, this agreement is not yet in place. Therefore, in this analysis we assume that the operation of the LFTRC will have an adverse effect on listed species by preventing the management, research, and monitoring that would have otherwise occurred at GNWR.”

The government of Guam has made it a policy to defend Ritidian from federal control. The injustice felt by original landowners deserves to be heard and addressed by all of us, as leaders before us have done for other original landowners.

In light of the above, and on behalf of those on Guam who will be irreversibly harmed by the bulldozing of limestone forests and construction of the live-fire training range on Guam, and on behalf of the people of Guam who have not consented to their lands, waters, and resources being used for these purposes, I respectfully urge you as governor of Guam to pause the clearing and construction of the live-fire training range and the cantonment area until the decision of the CNMI court case is issued, and the irreversible damage of lands and historic properties is not merely mitigated for, but rather addressed with accountability and due diligence for the people of Guam. The relocation of the marines is not scheduled to take place until 2020, and the relocation has already been delayed due to many factors at the control of Congress or the military. Certainly the destruction of our limestone forest and wildlife refuge can be put on hold temporarily while the leaders of Guam work cohesively with government agency leaders and the people of Guam to ensure the preservation of our ancient villages and pristine resources.

For your convenience and reference, a fact sheet on historic properties at Ritidian/Litekyan and Finegayan, maps of the LFTRC and the Surface Danger Zone, CNMI Complaint, and public notice for September 7, 2017 Informational Briefing with Original Landowners are enclosed here.

Governor Calvo, it is my understanding that you are currently in Washington, D.C. and I expect that you will discuss the impacts of the denial of H-2B visas on our economy, and the impact to our economy from the payment of War Claims out of Section 30 funds owed to Guam. **I ask that these issues and those outlined above be addressed together on a broader scale with the United States, in order that parts of Guam are not pitted against or used as collateral for the other, as our Section 30 revenues were pitted against justice for our war survivors in the War Claims process. Settlement regarding the H-2B visa issue is not justice by itself, and should be part of cumulative justice for the original landowners, preservation of historic sites and protection of our limestone forests.**

As we insist on the cleanup or compensation for past injustices of federal economic restrictions, war claims, land takings, and exposure to nuclear testing radiation, Agent Orange, and other contaminants, we cannot be silent and leave the effects of this clearing of our forests and expansion of the military control of lands and waters for future generations to remedy. As we have experienced with our manâmkô' and War Claims, money, years later, in and of itself does not right the injustice done to our people and our lands.

I stand ready to discuss and assist in the best strategy for Guam that will bring justice to our history and that will naturally unite and not further divide our people.

Senseramente,



Therese M. Terlaje
Vice Speaker

CC: Honorable Madeleine Z. Bordallo, US House of Representatives

Attachments: Fact Sheet on Historic Properties at Ritidian/Litekyan and Finegayan
Maps of proposed Surface Danger Zone at Ritidian/Litekyan
Tinian Women's Association et al vs. US Department of Navy, CV 16-00022
Public Notice for September 7, 2017 Informational Briefing with Original Landowners

Minutes – 2011 Programmatic Agreement (PA) Annual Workshop for Calendar Year 2016

Date: Thursday April 27, 2017

Location: Guam Museum First Floor Multipurpose Room

Time: 8:00 a.m. – 5:00 p.m.

Attendees (alphabetical order, * indicates phone in):

Advisory Council on Historic Preservation (ACHP): Katherine Kerr

Commonwealth of the Northern Mariana Islands (CNMI) Government: Wesley Bogdan, Epi Cabrera and Frank Angel

CNMI HPO: Merti Kani and Jim Pruitt

Department of Chamorro Affairs (DCA): Johnny Sablan and Joseph Santos

Fuetsan Famalaoan: Vivian Dames

Guam Legislature: Vice Speaker Therese Terlaje, Sen. Frank Aguon, Sen. Regine Biscoe-Lee, Nicole Santos, James Servino, Billy Iglesias

Guam Preservation Trust: Joe Quinata* (then attended in person), Jolie Liston, McMichael Mutzk

Guam State Historic Preservation Office (SHPO): Lynda Aguon, Joe Garrido and John Mark Joseph

Headquarters Marine Corps: Jacqueline Rice, Natalie Pilon

Joint Region Marianas (JRM): RDML Shoshana Chatfield, Roy Tsutsui, LT Tim Gorman

Marine Corps Activity Guam (MCAG): Major Patrick, Lt. M. Warren, Lt. J. Kim, Uriah Perez, Albert Borja, Ronnie Rogers, Sandy Yee, David Snyder and Maria Cruz

Marine Forces Pacific (MARFORPAC): Ed Lynch, Amanda Peyton, Chris Harris

National Park Service (NPS): Paul Scolari

Naval Facilities Engineering Command (NAVFAC) Headquarters: William "Bill" Manley

NAVFAC Marianas (NFM): Shawn Arnold, Rich Olmo, Catherine Norton

NAVFAC Pacific (NFP): Karen Desilets, Valerie Russel, Carly Antone*

Office of Economic Adjustment (Department of Defense, DoD): Gary Kuwabara

Office of the Assistant Secretary of the Navy (OASN): CDR Jeff Powell

Office of the Governor (Guam): Robert Crisostomo

Note: These minutes reflect a summary of the 2011 PA Annual Workshop and supports more detailed information presented in the final workshop brief.

Opening Remarks

1. MCAG facilitator Ronnie Rogers introduced Commander JRM, RDML Chatfield. RDML Chatfield delivered opening remarks, thanked everyone present, and reviewed 2011 PA accomplishments briefly and encouraged theme of "best practices."

Review Workshop Agenda

2. Ronnie Rogers then briefly went through "housekeeping" items, welcomed the CNMI, and summarized the workshop agenda.

Prior Workshop Action Items Review

3. First item covered was to discuss past items from last year's Annual Workshop held at Nimitz Hill. These included Joe Garrido's request for work on Puntan Patgon, John Mark Joseph's request for educational signs, CAPT Jones support of a universal GIS database for DoD and SHPO (delivered by JRM to SHPO December 9, 2016), giving cultural resource awareness training slides to CAPT Jones and NPS, the NRHP nomination and completion of the Mahlac River Site, ongoing implementation of the Public Access Plan, passing along GIS shapefiles for various projects to SHPO, added research of concrete slabs in Live Fire

Training Range Complex (LFTRC) area for John Mark Joseph was completed, and the avoidance of LFTRC historic properties by moving an access road.

NDAA 17 – Guam Cultural Repository Discussion

4. The Guam Cultural Repository (GCR) was then discussed. Bill Manley expressed appreciation for the way all PA partners had worked towards obtaining Congressional authorization for facility construction. CDR Powell, from OASN perspective of providing oversight of the process, passed along his congratulations to all for joint efforts to secure funds.
5. Gary Kuwabara from DoD's Office of Economic Adjustment (OEA) discussed the status and planning on the GRC. Congress appropriated \$12 million (a capped amount) in 2012 for the GCR. The GCR was one of five projects in the Congressional requested Economic Adjustment Committee (EAC) Implementation Plan (EIP). Four EIP projects have been "authorized." Next anticipated step is for the Office of the Governor to submit a GRC proposal to utilize the GRC funding for the construction, commissioning, and certification of the GRC. Everyone was mindful that current H2B visa issue was impacting the recently favorable bid environment. The FY2012 Appropriation is "X" funding, which means the funds are available until expended.
6. Vice Speaker Therese Terlaje asked if there were any written specifications on the Repository capacity. Gary K. answered yes. The Office of the Governor provided repository requirements at various time inclusive of the interactions with the EAC. At this point Senator Terlaje asked if a site had been chosen. Gary K. responded that the Office of the Governor had considered fifteen to eighteen sites. However, recently the University of Guam had surfaced as a possible site. OEA had a scheduled meeting with UoG as part of the continued due diligence process. Robert Crisostomo of the Governor's Office offered an invitation to Senator Terlaje to attend the meeting.
7. Ronnie R. asked Shawn Arnold for update on the DoD artifact storage situation who then responded that they are awaiting funds to pay NPS storage fees to house items, and also their plans to re-inter human remains. At this point, Senator Frank Aguon asked if records were kept, and where the records were located, to which Ronnie and Shawn responded that records were kept and are on file at the SHPO office.
8. Gary K. and Bill M. elaborated on earlier DoD efforts to locate all DoD archaeological collections from Guam and return them to Guam. Throughout the collections assessment and management process, DoD has taken care to keep all data and items together, and their locations accurately recorded throughout the process.
9. Robert C. then asked if \$12 million can be increased. Gary K. stated, Congress appropriated \$12.0 Million and that asking for an increase was not viable given the sentiments of the US Congress. The Office of the Governor and OEA are evaluating Design/Build or Design/Bid/Build as execution models to ensure the most cost efficient mechanisms. It was explained that completion of construction of the GCR by GovGuam is a desirable goal, but it is not a prerequisite for the relocation of the U.S. Marines from Okinawa, Japan.
10. Bill M. stated the PA commitment to bring all our artifacts back to Guam and curate in DoD compliant facility (NPS facility now) for current and ongoing archaeological data recovery may exceed capacity on Guam so the GCR is a unique and good response to problems that may result from buildup. When Robert C. asked if artifacts/remains were scattered, Bill M. and Shawn A. stated no, that all were accounted for and protected at two facilities.
11. Senator Terlaje read from PA statement that DoD would "advocate" to Congress to authorize the building of a full museum. Gary K. explained that this meant DoD would advocate but had no directive to mandate funding from Congress and / or other Federal agencies. Federal law requires DoD to protect (i.e. repository), but not required to provide display (i.e. museum) for artifacts. These efforts were communicated to Guam SHPO, and Lynda Aguon agreed with this statement.

12. John Mark Joseph urged that in selecting a site for the GCR, we must look 20 years to future needs, when expansion may be needed. All agreed.
13. Senator Terlaje returned to her question, and stated she doubted DoD operated in “good faith” when no federal funds were obtained for the museum. Kate Kerr of the ACHP asked for clarification of what “advocate for” means in this instance and suggested that DoD prepare a white paper on its efforts to advocate for museum funding from other federal agencies.
14. Joe Santos mentioned that original plans for a DCA complex was to have display (museum), repository (curatorial storage), and a burial facility, but agencies decided at the time that the display (museum) was not feasible.
15. Gary K. disclosed DoD and EAC engagements evolved over time. Convincing the US Congress on the need under Section 106 to protect artifacts uncovered on DoD footprint for buildup projects took considerable effort and engagement. However, there is no federal law requiring a museum (similar to the public health lab). He closed with DoD has done more for Guam under the 2011 PA, compared to comparable agreements in other States/jurisdictions.
16. Bill M. said DoD kept GovGuam informed during the process of planning for civilian infrastructure projects, and museum funding was subsequently obtained by GovGuam through other means.
17. DoD also provided funding to Guam utility upgrades, to assist with civilian quality-of-life improvements, associated to the buildup. This engagement helped the local Guam utilities.
18. Kate Kerr restated her request for a White Paper on DoD actions regarding Part B (advocacy for Museum funding by other agencies) mentioned by Senator Terlaje. Also a second White Paper to summarize past PA actions.
19. Gary K. surfaced the previous and ongoing coordination with NPS, in regards to constructing a certified repository. Paul Scolari (Interim NPS Superintendent) offered continued NPS assistance, similar to the Tucson Repository site visit. NPS will be a member of the Repository Intergovernmental Support Team (RIST).

Programmatic Mitigations

20. Mitigations were discussed, and Kate K. explained ACHP role to promote reuse of historic properties, to advise the president, oversee the Section 106 actions, serve as a signatory to the PA and provide oversight of PA implementation.
21. Ronnie R. stated discussion was on programmatic mitigations, not project mitigation, and therefore general and broad (not pertaining to one site or excavation). Programmatic mitigation include DoD assistance to SHPO in updating the Historic Preservation Plan (HPP) for Guam, preparation of a Guam Synthesis with every 5-year HPP and preparation of two NRHP (National Register of Historic Properties) nominations each year. DoD prepares nominations in consultation with the SHPO, package is routed up for approval at installation and Region level, to Bill M. in Washington D.C., then on to the DON Federal Preservation Officer and the NPS Keeper of the National Register. R. Crisostomo asked if NRHP status gives public access to sites on lands under DoD jurisdiction, and Bill M. responded that it does not, and further that NRHP listing does not confer additional requirements beyond what are imposed by determination of eligibility for listing.
22. Kate K. explained that while the ACHP has no role in National Register listing, the Keeper’s office is the final authority on questions of National Register eligibility.
23. In response to a question about Navy decisions about nominating historic and archaeological districts, Bill M. explained that Navy often identifies districts when they conform to the Criteria of Eligibility and meet NRHP standards. One issue that can affect proposed districts is how boundaries are defined, because NPS standards make clear that large areas that are non-contributing should be excluded.
24. Kate K. clarified that there are 5 types of NRHP properties (building, structure, object, site, and district)

25. Lynda A. stated that under Section 110 all eligible properties are to be nominated for listing in the National Register.
26. Bill M. agreed and added that the Section 110 has no deadlines for completion of the requirement to list, and all federal agencies are forced to prioritize actions based on available funding. Further, because the listing process affords no additional protections for historic properties and entails substantial effort to complete, the DON policy is to undertake listing only in special circumstances, such as the commitment in the 2011 PA.
27. Senator Terlaje asked if sites in Northwest Field and Finegayan (for the main cantonment – J-001B) are eligible for nomination or have been nominated. Ronnie R. replied any eligible sites are being fully data recovered, not nominated, as the buildup requires disturbance of the area for construction.
28. Bill M. stated that all DoD projects for buildup have PA Memos, and the latest (P-102 for electrical distribution) was made available to Workshop attendees today.
29. Joe Garrido stated that we should ask indigenous groups when determining eligibility, and do data recovery even if DoD says ineligible, as ancient villages existed, but not recorded other than in native lore or knowledge. He reiterated Senator Terlaje’s request for the \$25 million for federally funded museum.
30. John Mark J. asked that the website for PA Memo postings be made more “Guam centric” or user-friendly.
31. Dave Snyder started discussion of the Public Access Plan that is now up and running since started Dec. 30, 2016 per JRM instruction. Dave S. provided telephone 355-2013 for visit requests. He summarized that there are 44 sites on the plan, 9 do not need escort since they are off base, and 35 sites need escort and security check. There has been media promotion on TV and Radio. Dave S. discussed the process and forms needed for access. There are plans for a future brochure or advertisement, with potential expansion of efforts with NPS and Guampedia. John Mark J. asked to go to Naval Magazine sites sometime soon.
32. Joe G. discussed “confidentiality” saying he wants DoD to be required to let indigenous Chamorros know there are sites in certain locations, and he suggested that ARPA and confidentiality regulations just try to hide the existence of sites from the indigenous peoples. It was later relayed that federal law prohibits the DoD from disclosing exact nature and location of sites to the general public (only legislative branch of U.S. Government has the power to change federal law).
33. Discussion ensued describing the methods used with Native Tribes in the states, to protect sites from vandalism, as well as provide information on sites to tribal historians.
34. Dave S. moved on to discuss medicinal plant collection. So far 74 individuals with interest and status (*surahana/suruhanu*, traditional herbalists and others) are on a contact list for future opportunities to collect medicinal and cultural plants in areas slated for clearing. Dave S. has also arranged Munitions and Explosives of Concern (MEC) training for potential participants. The 74 individuals will be invited to mark trees for collection. Project contractors will cut trees marked and them to an area designated for carvers to pick up with their own transportation within a reasonable timeframe.
35. Dave S. explained that large group tours are not part of the Public Access Plan, but individuals can contact Public Affairs Officers for accommodation of large group visits for school-age children and similar events.
36. Ronnie R. and Sandy Y. have trained over 1700 personnel to-date, in cultural resource awareness and reporting protocol.
37. Ronnie R. mentioned that the Osteology report on all human remains in JRM collections has been completed (February 2016). Collections containing human remains are currently stored at a secure Navy facility, because they cannot be stored at the NPS facility.

How Well is the PA Working?

38. For the wider dissemination of PA Memos, it was noted that the Navy is currently notifying the Guam Legislature as well as the Mayor's Council of Guam.
39. Ideas for greater efficiency of PA Memo processing included combining vertical construction (buildings) into the horizontal construction to ease the SHPO review process (since once the ground footprint has been evaluated/consulted upon, the vertical building construction should have no (or minimal) Section 106 consultation issues.
40. John Mark J. requested that DoD increase the Area of Potential Effect (APE) of projects rather than have revisions to PA Memos. He also stated that if SHPO has already concurred with a determination of "No Historic Properties Affected" for a given area, no Research Designs for construction are needed (alluding to projects outside scope of 2011 PA, located on South Finegayan). Al B. responded that Navy will continue to find the balance between APEs that are too conservative (greater chance of triggering adverse effects) and APEs that reflect actual project impacts.
41. Joe G. suggested that the review time on SHPO's part may need to be increased. Al B. mentioned that the Navy has, as part of past practice, afforded more time for SHPO review in the face of extenuating circumstances if project schedules allow.
42. Al B. and Bill M. commented that Navy/Marine Corps teams have listened and continue listening to SHPO, in order to actively identify opportunities to ease workload.
43. Lynda A. inquired if Appendix E is regularly updated, and Navy's Ronnie Rogers explained that updates are provided on a regular basis (part of semi-annual reports). Again, SHPO requested that Project #s, IDs, Titles, SHPO RC#, etc. remain constant, and Navy confirmed that this has been the practice since last year's Workshop when SHPO first mentioned it.

US Marine Corps (USMC) Program Broad Overview - Biological Opinion – Natural Resources Projects

44. Endangered Species Act (ESA), Al B. noted the Biological Assessment (BA) for buildup went to USFWS, and the Navy hopes to finish up consultation in the summer of 2017, which would allow award of major construction projects for the base.
45. John Mark J. asked about moving the stones (latte fragments and lusong) and was informed that coordination is underway with contractor to move stones disturbed in the early post-WWII period out of the development footprint and onto secure staging area for later possible reuse as an interpretive display. Robert C. asked why it was so hard to get a contractor to move the stones, and Al B. and Ronnie R. explained the cultural sensitivities and beliefs related to ancient sites, even if previously disturbed.
46. John Mark J. suggested that Navy fully utilize the entire footprint of an Area Development Plan for areas such as North Ramp, the Main Cantonment, etc. as part of future Area of Potential Effect. It may beneficially reduce the evaluation time by SHPO and the consultation paperwork as more area can be considered reviewed and completed.
47. John Mark J. mentioned concern with the GWA pipes being installed along Routes 3 and 3A, and will check with Kate Kerr at ACHP. Navy subsequently noted that these projects are performed by GovGuam entities, outside the scope of the 2011 PA.
48. Ronnie R. and Al B. explained that three proposed natural resource-related projects have undergone or are planned for consultation with SHPO (native plant nurseries, replanting native species, and ungulate fence) to implement conservation measures under the Endangered Species Act. Discussion explained the nurseries were temporary (maybe 10 years) to nurture seedlings or transplants of native plants before they are transplanted out to the general Forest Enhancement area in Finegayan and protected from destruction by deer and pigs through construction of an ungulate fence and ungulate control. Al B. said approximately 1,000 acres will need to be restored.

USMC Project Outlook

49. Ronnie R. explained that supplemental consultation for MILCON P-715 and P-735 for construction of the LFTRC was done through the Range Mitigation Plan (RMP) per the 2011 PA. Extra research requested by SHPO at last year's Workshop was completed on concrete slabs to the northwest of the LFTRC, and they were still considered ineligible after this further work. The Data Recovery Report on the LFTRC was completed and delivered to SHPO along with interpretive booklet draft on January 24, 2017. DoD agreed to extend SHPO review period to June 2017. Potential upcoming consultation work in this area could include review of Surface Danger Zone (SDZ) signs, medicinal plant collection prior to clearing, and baseline status reports on sites that are to be monitored per the RMP.
50. Jolie L. asked what the APE is for the LFTRC at Ritidian, inquiring about noise in the SDZ. She suggested that intensive survey of US Fish and Wildlife Service-managed lands at Ritidian Point to evaluate potential for loss/impact. Joe S. agreed, for better community relationship and trust.
51. Al B. facilitated discussion of the need for more intensive surveys in the SDZ. Bill M. added that DoD was careful to follow ACHP guidance on what "reasonable and good faith effort" to identify historic properties for the LFTRC. Critically, the ACHP guidance calls for identification efforts that are commensurate with the anticipated effects, and it notes that there is no absolute requirement to identify all historic properties. Further, the RMP provides special measures address post-review discoveries and to monitor the condition of sensitive historic properties in the SDZ. Based on the guidance, DoD considers the level of effort it has applied as compliant with federal law.
52. Joe G. brought up a social issue stating there should be "compensatory mitigation" to fishermen who will not be able to fish off Ritidian for up to 39 weeks per year. Al B. stated this discussion with local fishermen should occur prior to and during early operation of the LFTRC, noting the Record of Decision (ROD) sets range operations at a maximum of 39 weeks out of the year, but actual schedules of when individual ranges are active with SDZs restricting fishing vessel transit routes are not yet exactly known.
53. Vivian Dames of *Fuetsan Famalaoan* asked what will be the cumulative negative effects to marine resources. Al B. mentioned that the Environmental Impact Statement (EIS) covered this; to include low risks of marine resources impacts associated with lead from firing ranges with proper assessment, monitoring and/or cleanups. The environmental analysis can be accessed on the DoD website <http://guambuildupeis.us>.
54. J-755 (Urban Combat Training area in Andersen South) has finished the design work, to which SHPO previously concurred. Currently the PA Memo for the Construction and Operation Phase has generated comment from both the SHPO and the public and DoD is working on a response and the follow-on PA Memo to resolve adverse effects. The construction footprint APE is small and avoids all sites/historic properties. Since the operations will cover the full Andersen South installation, the next PA Memo (#2 to include mitigation for adverse effects) will lay out the mitigation/data recovery to gather all data from the eligible historic properties. Joe S. asked about the small landlocked parcel for GovGuam education. Al B. said that potential operations will be excluded from parcels under GovGuam control, such as fenced areas where GWA wells are located. When Robert C. asked if actual operational effects will be better known in the future, Al B. confirmed, and suggested touching base with JRM Chief of Staff (CAPT Grimes) to ensure no conflicts between GovGuam and DoD operations at Andersen South.
55. P-103, the potable well construction project on Andersen Air Force Base (AAFB) was discussed, mentioning that the footprint/APE was moved to avoid impacting any historic properties, and that historic properties near the APE will be monitored regularly to assess condition.
56. P-102 for the Harmon-AAFB Power Upgrade corridor has had 3 small areas added to its APE (for laydown and green waste staging area), in areas that have already been surveyed and consulted upon with SHPO. John Mark J. agreed low likelihood of issues since areas has been reviewed prior.

57. Related to P-290 munition storage project, John Mark J. mentioned Mason Architects projects to look at possible “munitions district” within AAFB Munitions Storage Area. (Bill M. mentioned in a post-meeting note that a nationwide Program Comment has resolved Section 106 requirements for such properties.)
58. J-200-2 will extend communication utilities to the LFTRC from North Ramp and a PA Memo would be required.
59. Ronnie R. mentioned Naval Base Guam (NBG) clinic next to new minimart and across from Chapel. At this point John Mark J. commented that a tunnel was found near the Charles King Gym (close proximity to clinic area) and this area should have been given “high” probability, not “low” (referring to the probability mapping from the 2008 PA). Consultation is already complete for the J-006 Medical/Dental Clinic.

Open Discussion

60. Vivian D. stated GovGuam recently tasked Guam Environmental Protection Agency (GEPA) to test soil for Agent Orange within DoD footprint and inquired whether any buildup project may affect Agent Orange testing sites. Al B. stated it is at the JRM level to coordinate Agent Orange testing areas, but based on maps seen during a visit at Guam EPA and timing of buildup projects, it is unlikely that there are conflicts. Nonetheless, Al B. will double-check with JRM environmental staff.
61. Joe S. presented a brief film showing some future plans for Hagåtña development.
62. John Mark J. stated the GIS from Navy does not line up and asked where these were acquired. He said he will need original maps and then need to georeferenced all maps. To this Jolie L. stated she/IARII did all JGBU GIS in 2010, to which John Mark J. stated they are still wrong. Joe S. and Al B. mentioned “GIS Users Group” and Al B. set out action item for Sandy Y. (DoD Liaison to SHPO) to work with JRM to check DoD GIS accuracy.
63. Ronnie R. discussed additional methods to distribute information to the public, to which Al B. suggested public subscription to a mailing list/email list for updates at <https://go.usa.gov/x5BQS>.
64. John Mark J. then brought up the concerns with the terms “consulting” and “concurring.” Kate K. explained that 36 CFR 800 defines consulting parties and added that although the public is not a consulting party, agencies must plan to inform the public and receive input, so their voice can be heard. Bill M. added that the 2011 PA includes several measures to ensure that the public is informed and has opportunities to comment. Al B. noted that a “re-invite” to all parties previously invited and a new invitation to Prutehi Litekyan were sent on April 24, 2017, and that consulting parties invited can sign on to the 2011 PA or a member of the general public can sign up to be part of the general mailing list. Additionally the public can keep up with all actions and consultations via the CRI website. Ronnie R. suggested checking in with consulting parties that were recently re-invited to join the DoD meeting with Guam SHPO when reviewing the semi-annual report.
65. Kate K. of ACHP defined the three types of parties to the 2011 PA: 1) Signatories - the necessary parties of the agreement which are DoD, ACHP, and SHPO, 2) Invited Signatories - representatives of agencies with specific responsibilities under the 2011 PA and 3) Concurring Parties – individuals and organizations are deeply involved in historic preservation. Only Signatories can amend or terminate the 2011 PA.
66. Kate K. thanked the CNMI SHPO, Mertie K., for attending and mentioned the CNMI Joint Military Training (CJMT) and 2010 ROD Tinian projects. She indicated that the 2011 PA may need to be amended, depending on the resolution of Section 106 consultations to support the CJMT project. Robert C. asked if CNMI will get a federally funded museum. Wes Bogdan of CNMI mentioned that even if there is no CJMT PA, the current 2011 PA for the buildup requires the DoD to seek \$1.7 million for the construction of a repository and cultural and interpretive center in the CNMI.
67. Joe G. requested DoD resurvey “slivers of land” around AAFB, especially coastal, where there are private or public land, not land under DoD jurisdiction. This needs checking with the Guam Department of Land

Management. Al B. stated that the request will be relayed to DoD real estate staff to consider, an clarified that this effort is not part of the 2011 PA.

68. Regarding the tree harvest prior to clearing, John Mark J. asked who will be responsible to guard the trees from theft. Dave S. and Joe S. stated that all carvers interested in trees will be notified of location and date, with arrangements for carvers to pick up as expeditiously as possible. Once delivered outside DoD jurisdiction, carvers have responsibility for the wood material.

Closing Remarks

69. Bill M. delivered closing remarks, thanking all participants for prior and current efforts. The 2011 PA's success is a direct result of PA Parties' willingness to partner on solutions and the Navy looks forward to continued engagement.

Action Items from April 27, 2017 Workshop

1. ACHP (Kate K.) would like a white paper on efforts to fund complete museum complex (VII.C.4.b). Wants to know what actions were taken and if more actions need to be taken. Bill M. and Gary K. have for action.
2. ACHP wants a summary of previous PA workshops. Would like to provide it to any new entities that sign on to the 2011 PA. Ronnie R. to provide minutes from prior workshops.
3. Have future discussion with 2011 PA parties on potential amendments as a result of CJMT Programmatic Agreement. MARFORPAC has for future action, any update on status to be provided in next Annual Workshop.
4. Offer public an opportunity to sign on to email list to get information. LT Gorman had previously offered to use electronic mailing list. Info was provided on flyer. DoD PAOs will provide link in PSA for PA Memos, SHPO Liaison will check for inclusion in PSAs as part updated procedures.
5. Joe G. requested that some compensation be offered to Fisherman's co-op as mitigation for loss of traditional access to fishing waters off northern Guam when ranges are active. MCAG has for action once ranges are in operation and the actual timeframe/nature of restrictions are known. Impacts can be specifically discussed as part of future engagement and outreach with affected community members (~CY 2024).
6. John Mark J. described problems with matching JRM and SHPO GIS. Al B. recommended continued engagement with Shawn A., recommended another meeting on GIS. Al B., Sandy Y. and Shawn A. have for action.
7. Regarding identifying a GovGuam staging area for tree harvest: Joe S. and Dave S. will coordinate on location.
8. Robert C. requested a list of major sites for public dissemination that might have been part of ancient villages. Joe G. added that they don't want every pottery scatter or similar minor sites, just substantial sites (names should be aligned with old place names e.g. Haputo, Dobo and Dadi). Sandy Y. will provide at earliest opportunity, as part of SHPO Liaison workload.
9. Robert C. suggested coordination between DoD PAOs and Governor's PAO to post information on the GovGuam TV channel. JRM/NFM/MCAG PAOs for action to engage with GovGuam.
10. John Mark J. requested that DoD consider increasing the APE of projects rather than have many revisions to PA Memos for subsequent changes to APEs. Sandy Y. will add as part of quality control procedures for PA Memos and relay concern to AAFB/NBG.



Naval Facilities Engineering Command
Marine Corps Activity Guam Public Works
Department (MCAG PWD)
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MILITARY RELOCATION TO GUAM AND CNMI PROGRAMMATIC AGREEMENT (PA) MEMO #3

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

PROJECT SUMMARY

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

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

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

PROJECT LOCATION

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

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vicinity are Mogfog, Pãgat, and Sasayan.

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

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

PROJECT DESCRIPTION

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

MITIGATION OF IMPACT ON HISTORIC PROPERTIES

Scope of DoD Mitigation Efforts

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

DETERMINATION OF EFFECT:

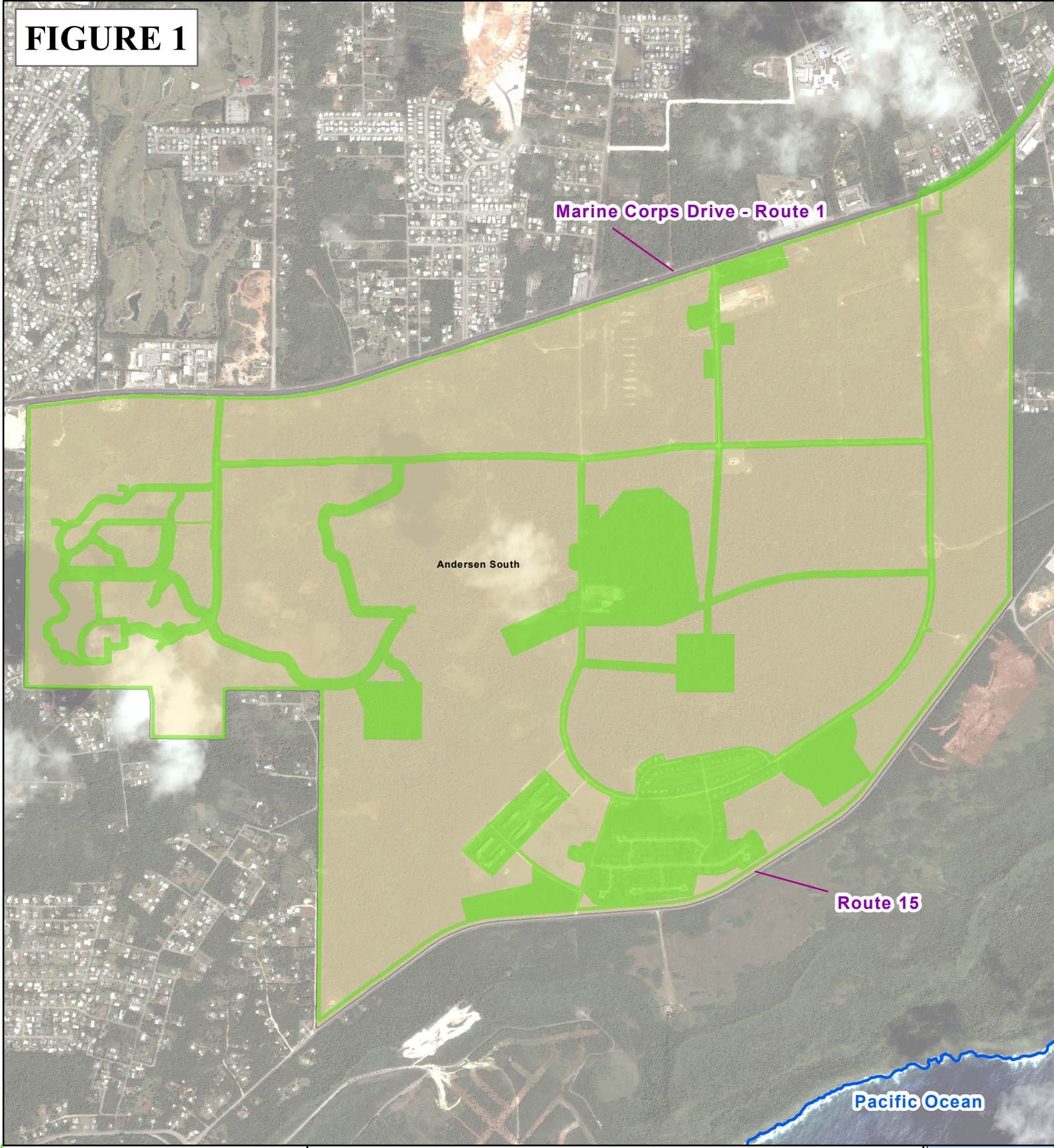
It has been determined by MCAG PWD and SHPO that the construction of the communications corridor along Routes 1, 3 and 9 will have no historic properties affected, as none have been discovered along the corridor approved by SHPO for geotechnical borings in October of 2016.

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


Maps and Comment form follow

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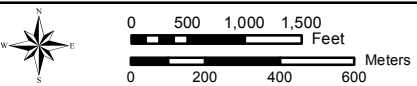
FIGURE 1



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

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

**J-755
Urban Combat Training**



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



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

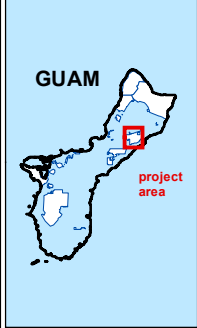
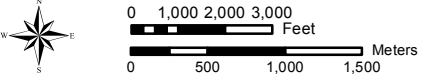


FIGURE 2



**J-755
Urban Combat Training**




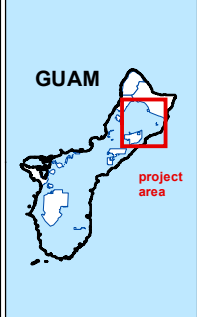
PREPARED BY:
Naval Facilities Engineering Command
Marianas Date: 3/8/2017



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

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

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



If submitting via **e-mail**, scan and send to: criwebcomment@navy.mil

If submitting via **postal mail**, send to:

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

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

Privacy Act Statement

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

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

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

SUBJECT: PA Memo #3, Determination of Effect

Date: _____

Name: _____

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

E-Mail Address: _____

and/or

Postal Mail Address: _____

COMMENTS: _____

COMMENTS: _____

