



Department of Parks and Recreation
Dipattamenton Plaset yan Dibuetision
Government of Guam



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State Historic Preservation Office
 Guam Department of Parks and Recreation

From: Patrick Lujan
 Guam State Historic Preservation Officer

To: Signatories:

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

Brigadier General, United States Marine Corp
 Deputy Commanding General, Marine Corp 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 and 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: Invocation of Stipulation XIII to object to actions in the MILCON P-735 Multipurpose
Machine Gun Range

Hafa Adai Rear Admiral Menoni,

In reference to the July 2, 2018 resolving objections agreement between Joint Region Marianas (JRM) and the Guam State Historic Preservation Office (SHPO), I am invoking Stipulation XIII of the 2011 Programmatic Agreement to object to the 2015 Training Range Review and Analysis (TRRA) document for the entire Live Fire Training Range Complex proposed at Northwest Field. MILCON P-715 Known Distance Ranges is included in the resolving objections agreement, but the MILCON P-735 Multipurpose Machine Gun Range also relies upon the TRRA, which has not provided both parties with sufficient information to assess the effects of the undertaking on historic properties.

I propose to begin the 45-day consultation to resolve the objection on the date this letter is provided to the Signatories, Invited Signatories, and Concurring Parties.

P-735 was not included in previous objections on May 24, 2018 because it was not under bid and had no potential impact to construction schedules at the time. We decided to defer resolution of P-735 until such time that archaeological monitoring at P-715 yielded more information. The undertaking under bid was J-001B, which had mass clearing/grading during the time of the 2018 Resolution.

The numerous findings of historical sites and human remains found at both P-715 and J-001B can only confirm the deficiencies of the TRRA. Hence, I am advising JRM to further collect information at P-735 prior to the signing of any contracts for any construction associated with P-735. This should eliminate any potential conflicts and the destruction of historic properties.

Therefore, I object to any actions in this area until it is resurveyed. The invocation of this objection pursuant to Stipulation XIII is to resolve concerns based on the new information derived from the mutually-agreed upon monitoring at P-715.

The historic contexts of the late 19th/early 20th century were not fully considered in the surveys, such as the example of the Machanao Village, which was discovered in the text of examining the road system within P-735. Furthermore, my office believes that JRM has not satisfactorily identified features found in the field and that many of our concerns have not been addressed properly. We hope that in the future we can generate a more constructive consultation with the implementation of all work and preservation of historic properties.

I propose to resolve this objection by establishing a site-specific preconstruction archaeological survey for P-735 after evaluating geospatial information from the monitoring of P-715, to include features, isolated objects and other relevant archaeological data.

If agreement as to a proposed resolution is reached within the 45-day consultation period, JRM will summarize the resolution and provide the information to the Signatories, Invited Signatories, and Concurring Parties. If agreement is not reached within the consultation period, JRM will immediately refer the matter to the ACHP, consistent with Stipulation XIII.

Sincerely,



Patrick O. Lujan
State Historic Preservation Officer (Guam)