

## Comments Received by June 2, 2014 for J-001B U&SI Mass Grub and Grade, Phase 1 (GoJ), PA Memo #1

Name	Comment/Question
Guam SHPO (RC2014-0625)	Athens report provides no photographs evidence of the area in question and furthermore, Athens did not record the historic dump site. The historic dump site should be recorded is <i>[original statement has been redacted due to confidentiality requirements under the Archaeological Resources Protection and National Historic Preservation Acts]</i> , which needs to be recorded; we've listed it in the GHPI <i>[original statement has been redacted due to confidentiality requirements under the Archaeological Resources Protection and National Historic Preservation Acts]</i> .
Guam SHPO (RC2014-0625)	<i>[Original statement has been redacted due to confidentiality requirements under the Archaeological Resources Protection and National Historic Preservation Acts]</i> , shows areas of high and medium potential also within the APE. The medium potential area was surveyed in 2009 by Athens, however, the conclusions were not reported in the Welch 2010 report. The <i>[original statement has been redacted due to confidentiality requirements under the Archaeological Resources Protection and National Historic Preservation Acts]</i> indicates that even heavily disturbed areas may contain <i>[original statement has been redacted due to confidentiality requirements under the Archaeological Resources Protection and National Historic Preservation Acts]</i> . Athen reports that no subsurface testing was conducted in the survey area, even though Welch recommended subsurface testing and or monitoring of the area based on the 2007 reporting.
Guam SHPO (RC2014-0625)	In future submittals, kindly provide the area of potential effect (APE) overlay over any existing survey with historic properties to better aid us in evaluating the undertaking. It will help us also, if maps presented in the PA Memo are the same scale.
Guam SHPO (RC2014-0625)	In reviewing our Guam Historic Properties Inventory (GHPI) Site Numbers we found that one site listed in the PA Memo from 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, GHPI Site Number <i>[original statement has been redacted due to confidentiality requirements under the Archaeological Resources Protection and National Historic Preservation Acts]</i> is incorrectly identified and should be <i>[original statement has been redacted due to confidentiality requirements under the Archaeological Resources Protection and National Historic Preservation Acts]</i> . The GHPI Site Number <i>[original statement has been redacted due to confidentiality requirements under the Archaeological Resources Protection and National Historic Preservation Acts]</i> was issued to <i>[original statement has been redacted due to confidentiality requirements under the Archaeological Resources Protection and National Historic Preservation Acts]</i> . GHPI Site Numbers provided to <i>[original statement has been redacted due to confidentiality requirements under the Archaeological Resources Protection and National Historic Preservation Acts]</i> for the DEIS started with the GHPI Number <i>[original statement has been redacted due to confidentiality requirements under the Archaeological Resources Protection and National Historic Preservation Acts]</i> .
Pangelinan, B.	Does the project site affected include the Haputo Beach area and the numerous cultural resources located there? Map provided appears to include parts of the Haputo Beach. What are the anticipated adverse effects to the area? Will public access to this historical, cultural site be impacted?

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Pangelinan, B.	Most current archaeological survey was conducted in 2010 (four years ago) for this Project. What are the requirements for updating for a more current archaeological survey/report to ensure that public is provided best updated information? These properties should be re-surveyed given the new areas introduced and the increase in the size of the area of potential effect. Most current survey/report should be accessible to the public. Additionally, we do not have access the surveys/reports listed in the PA Memo. Do these reports state whether or not burial sites will be affected in the project area? It is critical that these sites remain untouched and undisturbed and every effort be exercised to ensure protection and preservation of the sacred ancient remains of our Chamorro people. If you cannot mitigate, then they should be avoided.
Pangelinan, B.	Regarding the previously bulldozed pre-contact habitation and artifact scatter site, more description of what is proposed to be lost or adversely impacted is needed. Whether or not the site was previously bulldozed or affected, more information should be provided in this PA Memo to ensure that the public is aware of the historical data retrieved during this study. The website and these documents should be made public user-friendly. For example, the Historic Property number listing in the PA Memo #1 (J-001B) states that six (6) sites will be affected, but does not specify what site number or project is being referenced under the Public Education and Interpretation Series Booklets on the Cultural Resources Information website. Further, if one does not have access to Appendix E of the Programmatic Agreement, then it is not possible to see which cultural resources are directly affected, such as Guam Historic Properties Information (GHPI) Sites [ <i>original statement has been redacted due to confidentiality requirements under the Archaeological Resources Protection and National Historic Preservation Acts</i> ]. What efforts moving forward will you make to ensure that this process is made more user-friendly for the general public to provide comment?
Pangelinan, B.	Does the composition of the archaeological team conducting surveys include the participation of native inhabitant(s) of Guam? If not, what efforts will be made to ensure that our subject matter experts on Guam are included at all levels of participation in this process?
Pangelinan, B.	Excluding removal, what efforts will be made to protect and preserve the culturally important natural resources such as the nunu, da'ok, dukduk, and ifit trees as well as other medicinal plants in the area?
Pangelinan, B.	How does the Naval Facilities Engineering Command (NAVFAC) Pacific plan to handle the significant historical artifacts found? Will they be removed and catalogued, stored for eventual transfer to the government of Guam?
Pangelinan, B.	The Haputo Beach Site is listed on the Guam and National Register of Historic Places (NRHP). Does not the NRHP designation serve to protect such sites from any Department of Defense Undertaking? How does the proposed DoD Undertaking affect those sites listed on the NRHP?
Pangelinan, B.	Visually, the maps provided are vague. More information such as beach/coastal areas, landmarks and roadways should be identified to ensure that the public is able to read and understand the sites involved.

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Pangelinan, B.	Better effort to inform the public of these PA Memos is greatly needed to ensure receipt of public comment. The only notice released that the public may have access to was on the Pacific News Center website dated May 31, 2014. For comments due on June 2, 2014, this effort is inadequate and more outreach must be done to ensure that the people of Guam are able to participate in such a process. NAVFAC Pacific should consider purchasing airtime on local radio stations or print advertisements in local newspapers. It is absolutely clear the public notice is inadequate under the current system and must be modified.
Perez, S.	Accessibility of the memo was limited and there is little to no public outreach to comment on this PA memo. The website itself was hard to find and difficult to navigate. The url name of the website was not easily recognizable, nor was the memo name. What does grubbing even mean? The information was vague and the jargon is heavily and not easily decipherable for even educated members of the local Guam community. In general the community of Guam is fatigued in having to respond to military plans in this manner. No meaningful dialogue take place, for many residents feel that all plans are set in stone and this protocols are just in place and comments make little to no difference in the final course of action.
Perez, S.	Locally operating CRMs should get the contracts for any future surveying and monitoring work for the build up. Lead archeologists and investigators working on any Navy projects in here and in the Northern Marianas should have ample experience and back ground in the region. Additionally there should be a preference for locally trained archaeological field technicians.
Perez, S.	Who did the oral testimonies and interviews in regards to the traditional cultural properties? There is no indication of the evaluations on the list of sources found at the end of the memo. (2) Who were the participants in the oral histories? (3) Will these testimonies ever be available to the public?
Perez, S.	Were the plants identified and surveyed in all 641 acres of the APE, or just around the two identified cultural sites? What were the credentials of those who identified culturally significant plants or medicinal herbs? Many rare medicinal herbs are found in the northern limestone forests and jungles, which are diminishing around Guam due to development both military and commercial. There are hundreds of herbs of cultural value that even trained botanist will not have knowledge to. It is of utmost importance that traditional healers identify the resources before any work begins. There are organizations such as Håya Foundation and Åmot Taotao Tåno' that work with native traditional healers and can help identify individuals to conduct survey work prior to grubbing, clearing and grading work.
Perez, S.	With all the development slated for the next few years with military build up it is critical the federal government assists the local government in addressing staffing shortages with over site agencies. All properties of cultural and historical significance are managed with the Department of Parks and Recreation. HPO or the Historic Preservation office is understaffed and personnel resources are strained. Adequate funding should be identified so that the agency can do its due diligence to protect all valuable cultural and historic resources.
Perez, S.	Navy properties such as NCTAMs or NBGTS are used in identifying the project areas. Use of the local names needs to also be required. These lands have been important to the people of Guam for thousands of years and omitting the cultural place names is insensitive and wrong.

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Perez, S.	<p>Under an enormous amount of political pressure, in 2011 the PA was sign with hesitation from Guam SHPO. The PA was not written to include the changes made for the new DSEIS. Will a new PA be written or will it just be amended to fit the changes? Concurring parties on the original PA did not sign off in the 2011. What was the reasoning that these parties were unwilling to sign off on the PA? What will the process be for new interested parties to join on as concurring parties? When will the access plan for cultural practioners such as hunters, fishermen, weavers, carvers and traditional healers be released? Please include access for people who are apprenticing under the practioners so that the knowledge can be perpetuated.</p>