

RESPONSE TO COMMENTS FROM SENATOR PEREZ ON PA MEMO # 1 P-320 RECYCLING CENTER, MARINE CORPS BASE CAMP BLAZ (MCBCB), FINEGAYAN, GUAM

30 March 2026

Senator Sabina Flores Perez comments (January 26, 2026)	MCBCB Response
<p>1. <i>Firstly, the information contained in the PA memo is insufficient for the general public to fully understand the potential impacts of the proposed project on both cultural resources and the environment. A significant amount of supplementary research is required, and although a list of references is included, not all of the documents are easily accessible online- and none are directly provided by NAVFAC in the PA itself. Source materials should have been readily available on the PA, in the form of either links or attachments, to provide clarity, transparency, and ease of access to the public. This concern has been brought forward to NAVFAC in previous public comments for PA memos, but does not seem to have been addressed. For NAVFAC to prove its commitment to enable public participation, it must establish the consistent practice of providing all source documents/materials and making supplemental information readily available.</i></p>	<p>1. The Programmatic Agreement (PA) memo contains all required information for the public to make an informed comment under the 2011 PA review process, including a project description, location map, identification of historic properties (if any) and the Navy's determination of effect. The list of references for identification efforts in and near the Area of Potential Effect (APE) from previous studies is provided in the P-320 PA Memo, both in map (Figure 2) and list form (References section). Most studies that contain information on historic properties remain subject to confidentiality and access restrictions imposed by federal law and cannot be posted in public websites but can be accessed at the Guam State Historic Preservation Office (SHPO) for legitimate purposes.</p> <p>The project that completed site preparation and grading to bedrock for the P-320 project, the J-001B Utilities and Site Improvements (U&SI) project, earlier completed the PA memo public review process in 2018.</p> <p>Link to the J-001B U&SI PA Memo: https://pacific.navy.mil/Portals/72/NAVFAC_PACIFIC/Documents/NEW%20PAM1%20J-001B%20USI%20PhIA%20PUBLIC%2011-14-</p>

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	2017%20FINAL%20w%20figs%20(1).pdf?ver=8gHV1lNw4hryqUBpD0mWuA%3d%3d
<p>2. <i>I am also concerned over whether plans for a recycling center facility, solid waste transfer station building, administrative building, parking, operational vehicle loading area, and supporting utilities' should be considered "individual undertakings" that require separate PA memo processes.</i></p>	<p>2. All of the components are part of a single construction project within the P-320 APE.</p>
<p>3. <i>The PA memo references J-001B Utilities and Site Improvements (U&SI) archaeological investigations/studies, identification efforts for historic properties, previous mitigation projects, and a 2018 resolution for post-review discoveries; but the memo does not describe the details of said investigations, studies, discoveries, or mitigation tactics. The PA needs to clarify what exactly, if anything, was previously found at the Area of Potential Effects (APE)- considering it exists within an area which contains historical and cultural properties and objects.</i></p>	<p>3. The J-001B U&SI project archeological investigations and related studies were carried out for the entire area that encompasses the individual projects planned within the J-001B U&SI footprint. No historic properties were identified in the P-320 APE during the course of the J-001B U&SI investigations.</p>
<p>4. <i>Additionally, I believe that a separate archaeological study/investigation should be conducted for the APE, located in the P-320 area, rather than rely on a previous study of the general area.</i></p>	<p>4. A separate archeological study for the P-320 APE is not warranted, as the P-320 APE is within the J-001B U&SI footprint, and efforts to identify historic properties were completed for the J-001B U&SI project in accordance with the 2011 Programmatic Agreement (PA), and by extension, 36 CFR § 800.4.</p>

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<p>5. <i>The APE is located on a limestone plateau within the area of Finegayan, previously known as Machanao. There are about nine archaeological sites eligible for nomination to the National Register of Historic Places within this general area alone (Amesbury, MARC).</i></p>	<p>5. There are no historic properties within the P-320 APE. The sites referenced in your comment underwent mitigation, consistent with the 2011 PA as part of J-001B U&SI effort. Moreover, the sites were not located within the P-320 APE.</p>
<p>6. <i>Plus, the Guam and CNMI Military Relocation EIS (2010) stated "construction at NCTS Finegayan has the potential to require the removal of natural resources of cultural concern" (Guam and CNMI Military Relocation FEIS, 2010, pg. 12-9). The list of references for identification efforts in and near the APE from previous studies must be provided to the public. Information, studies, and plans regarding historic properties should be made available to the public based on "project specific APEs for direct and indirect effects" as stipulated in stipulation IV.E.2 of the 2011 PA (Programmatic Agreement, 2011).</i></p>	<p>6. The list of references for identification efforts in and near the APE from previous studies is provided in the P-320 PA Memo, both in map (Figure 2) and list form (References section). Certain sensitive information is subject to confidentiality and access restrictions imposed by federal law.</p>
<p>7. <i>Furthermore, oversight of investigations and PA procedures must be heavily enforced. A 2019 KUAM article titled "SHPO told of new archeological finding at Machanao," reported that Guam's former SHPO was "surprised to see the artifacts at one site had already been removed," with a CHamoru ax/adze found freshly broken at the site. After said discovery, the former SHPO had to request that military parties not remove artifacts from the latest sites before a work plan could be approved (KUAM, 2019). This behavior by military parties is</i></p>	<p>7. This comment is outside the scope of the P-320 PA memo; this matter underwent processes agreed to under the 2018 Joint Region Marianas (JRM)-SHPO Dispute Resolution Agreement.</p>

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<p><i>extremely concerning and must be prevented at all costs. Another pervasive issue is that it remains unclear whether concurring parties of the 2011 Relocation PA have provided their opinions or advice on this specific memo.</i></p>	
<p><i>8. Although the Guam Legislature is listed as a concurring party, I am unaware of any ongoing activities related to the PA's consultations, annual workshops, or advisement periods, and am typically only updated when public comment periods such as this are initiated.</i></p>	<p>8. The Guam Legislature is not a concurring party to the 2011 PA. The 2011 PA Annual workshop is a business meeting held among 2011 PA Parties.</p>
<p><i>9. The leadership and representatives of Guam should have a direct seat at the table, in order to provide optimal access to the public to all projects facilitated by this PA and its subsequent memos. Furthermore, with the dissolution of certain groups since 2011, such as We Are Guahan, my office suggests inviting newer and active CHamoru advocate groups as concurring parties to the 2011 Programmatic Agreement.</i></p>	<p>9. Participation through procedures of the 2011 PA is reserved to PA Parties.</p> <p>Requests to join from new entities with legal mandates for the preservation of cultural heritage will be considered on a case-by-case basis, but we do encourage interested parties to engage directly with the Guam SHPO and Guam-based concurring parties to ensure their concerns are addressed.</p>
<p><i>10. Lastly, there is no information regarding whether these proposed projects will also follow the National Environmental Policy Act (NEPA) process. This is significant because the project involves trash collection/accumulation, recycling, grading/excavation, etc. which all relate to environmental challenges such as landfilling, the</i></p>	<p>10. Environmental review under NEPA for P-320 was formally completed under the 2015 Final Supplemental Environmental Impact Statement (FEIS). The current public comment period is a specific requirement under the 2011 PA and PA memo review process. The purpose of the</p>

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<p><i>capacity of local recycling facilities, and potential erosion and groundwater contamination.</i></p>	<p>PA memo process is to provide a dedicated review of potential effects on historic properties in accordance with the 2011 PA. While this process is specific to historic preservation, other environmental considerations are addressed through their own distinct processes required by other environmental statutes, such as NEPA.</p>
<p>11. <i>The community requires additional information to truly understand the project's environmental impacts, including:</i></p> <ul style="list-style-type: none"> • <i>Facility operation and maintenance plans for each facility proposed in the PA, including:</i> <ul style="list-style-type: none"> ○ <i>Facility construction and design,</i> ○ <i>Facility capacity and expected operating life,</i> ○ <i>The expected number of workers at such facilities and the need for wastewater facilities (i.e. wastewater infrastructure, expected amount of wastewater accumulation, and plans for disposal of such),</i> ○ <i>Waste composition and weight/volume,</i> ○ <i>Procedures for handling hazardous waste, oil, paint, pesticides, and other wastes that are typically not accepted at solid waste transfer station facilities or recycling facilities,</i> 	<p>11. With the exception of the 2011 PA public access provision for collection of natural resources of cultural importance, the listed items are outside the scope of the PA memo process which is focused on ensuring historic properties are appropriately considered. The concerns listed in this comment are primarily regulated by Guam Environmental Protection Agency (EPA), USEPA and US Fish and Wildlife Service under separate federal laws.</p> <p>With regards to the concern for <i>ámot</i> (medicinal plants) present within the APE, traditional healers and cultural artisans were granted access opportunities prior to vegetation clearing for the area by the J-001B project under the public access provision of the 2011 PA.</p>

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- *Emergency or contingency procedures (in response to fires, storms/stormwater runoff, groundwater contamination, etc.).*
- *Comprehensive mitigation plans and procedures to address erosion, stormwater runoff, flooding, and construction designs for water drainage systems, as well as plans for protecting groundwater and the Northern Guam Lens Aquifer (NGLA) from runoff contamination and leachate to meet standards of the Safe Drinking Water Act;*
- *The Layon landfill's capacity to accept waste from the proposed solid waste transfer station, especially as the number of servicemen increases. Will DoD contribute funds to the Guam Solid Waste Authority for the construction of new landfill cells to accommodate an increased volume of waste received?;*
- *The capacity of the proposed recycling facilities (by weight/volume), what items are expected to be recycled (e.g. plastic, glass, paper/cardboard, electronics/e-waste) and proposed end-use/markets for the resultant products, whether these recyclables will be shipped off-island or stored, the potential for air pollution and water contamination and its effects on the surrounding environment, and the expected rate of waste diversion from the landfill (will it meet the DOD's policy of 40% diversion of non-hazardous waste?);*

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<ul style="list-style-type: none">• <i>The expected additional strain on Guam's infrastructure such as power, water, and wastewater infrastructure;</i>• <i>Plans for the use of green waste derived from landscaping, grading, and construction;</i>• <i>The presence of flora and fauna, especially limestone forests, within the APE that is expected to be impacted by construction and grading, and procedures to comply with the Endangered Species Act (ESA);</i>• <i>The presence of åmot (traditional medicine) and other culturally important flora within the project-specific APE (P-320), and procedures to allow traditional healers and cultural artisans access to these plants; and</i>• <i>Cumulative impacts from multiple ongoing projects within the Marine Corps Base, alongside this proposed initiative; etc.</i>	
<p>12. <i>No information has been provided or disclosed to the public regarding environmental impacts or planned mitigation efforts for these specific projects, because plans for them were identified after the preparation of the relocation FEIS and Appendix E of the 2011 relocation PA.</i></p>	<p>12. These comments are outside the scope of the PA memo process, which are focused on historic property concerns.</p>

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<p>13. <i>Please advise on if NAVFAC will follow the NEPA process for projects planned in this memo. If this is not the next expected step, then I respectfully urge NAVFAC to follow the NEPA process by providing an Environmental Impact Statement and facilitating public review of the proposed projects.</i></p> <p><i>Please advise on if NAVFAC will follow the NEPA process for projects planned in this memo. If this is not the next expected step, then I respectfully urge NAVFAC to follow the NEPA process by providing an Environmental Impact Statement and facilitating public review of the proposed projects</i></p>	<p>13. The NEPA process was completed in 2015. These comments are outside the scope of the PA memo process, which are focused on historic property concerns.</p>
<p>14. <i>Pursuant to the Guam Zero Waste Masterplan and island-wide Zero Waste implementation plan, local policies regarding recycling, waste diversion targets, and zero waste initiatives aim to reach 50% and 75% waste reduction by 2035 and 2045, respectively (Article 3, Chapter 51, Title 10 of the Guam Code Annotated). Other local zero waste policies include Public Law No. 34-110 (2018), which bans single-use carryout plastic bags at certain retail establishments; and Public Law No. 30-221 (2010), which would have established the Guam Beverage Container Recycling Act, a container recycling deposit program under the Guam Environmental Protection Agency (P.L. 34-100; P.L. 30-221).</i></p>	<p>14. These comments are outside the scope of the PA memo process, which are focused on historic property concerns.</p>

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<p>15. <i>The Navy Exchange (NEX) has yet to participate in the plastic bag ban and the latter public law's implementation has been delayed until a 'Memorandum of Understanding or other agreement is executed by GovGuam and DoD representatives.'</i></p>	<p>15. These comments are outside the scope of the PA memo process, which are focused on historic property concerns.</p>
<p>16. <i>NAVFAC and the Government of Guam should collaborate more often on promoting recycling, composting, and other green initiatives, in order to show their joint commitment towards a healthier and cleaner Guam. Therefore, I highly recommend that NAVFAC consider complying with local zero waste policies, assist in implementing the aforementioned public laws, and, when possible, provide funds for the implementation of newer recycling and composting initiatives that can benefit both military and civilian families.</i></p>	<p>16. These comments are outside the scope of the PA memo process, which are focused on historic property concerns.</p>
<p>17. <i>In conclusion, new archaeological studies and investigations should be conducted within the project-specific APE (P-320), along with implementation of the NEPA process, due to the high cultural and environmental value of limestone areas within Finegayan.</i></p>	<p>17. Please refer to Response 4 and 10.</p>

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<p>18. <i>Documents listed in Enclosure 1 should be more readily available/accessible to the public; please provide these in a separate document or memo with either direct links or as attachments</i></p>	<p>18. To address the documents listed in your letter:</p> <ul style="list-style-type: none">• All of the Interpretation Series Booklets, included the one authored by J. Amesbury, are available to the public through the NAVFAC PAC Cultural Resources Information website (https://pacific.navfac.navy.mil/About-Us/Cultural-Resources-Information/Public-Education-and-Interpretation-Series-Booklets/).• The Final SEIS and Record of Decision (2015) as well as the 2011 PA are publically accessible on the MCBCB Environmental Program website (https://www.mcbblaz.marines.mil/Environmental-Program/#tab/environmental-reference-collection)• Other non-Navy sources of information such as news articles and public laws are available at their respective public websites.
<p>19. <i>Other important resources that should be disseminated include the Guam Synthesis and the Cultural Landscape Report for Northern Guam (which focuses on installations affected by the relocation in Northern Limestone Plateau and include Finegayan).</i></p>	<p>19. Upon completion the Guam Synthesis will include a public version free of Controlled Unclassified Information. It will be posted on a public website with an accompanying Public Service Announcement. The Cultural Landscape Report for Northern Guam is not a listed reference and is not a mitigation identified in the 2011 PA. We will inquire with the Guam SHPO to locate the</p>

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	document and evaluate for inclusion in future PA memo development.
20. <i>Cultural objects of significant importance are not limited to property or material items; great care must also be provided in ensuring that the community is aware of the potential presence of native and endangered flora and fauna or ãmot.</i>	20. To reiterate, neither intact soil, nor native plants are present within the P-320 APE due to site preparation completed by the J-001B project.
21. <i>I further recommend that NAVFAC comply with local zero waste policies, to assist the island in reaching its goal of 75% waste reduction by 2045 and to provide both military and civilian families with a cleaner and healthier environment.</i>	21. These comments are outside the scope of the PA memo process, which are focused on historic property concerns.
22. <i>Lastly, I respectfully request that NAVFAC invite newer and active CHamoru advocate groups as concurring parties to the 2011 relocation PA, and to more directly include the Guam Legislature in consultations regarding the same.</i>	22. Requests to join from new entities with legal mandates for the preservation of cultural heritage will be considered on a case-by-case basis, but we do encourage other interested parties to engage directly with the Guam SHPO and Guam-based concurring parties to ensure their concerns are addressed.



OFFICE OF SENATOR SABINA FLORES PEREZ
I Mina'trentai Ocho Na Liheslaturan Guåhan
38th Guam Legislature

January 26, 2026

Transmitted electronically via
NFM-CRIWebComments@us.navy.mil

NAVFAC
Naval Facilities Engineering Systems Command,
Marianas PSC 455, Box 195
FPO AP 96540-2937

Re: Public Comment on the Military Relocation to Guam and CNMI Programmatic Agreement (PA) Memo #1: P-320 Recycling Center (Construction)

Håfa Adai,

I am submitting this comment in response to the Military Relocation to Guam and CNMI Programmatic Agreement (PA) Memo #1. As an elected official from Guåhan whose main concerns consist of environmental protection and cultural preservation, I have several concerns and questions regarding the construction of facilities located in the U.S. Marine Corps Base Camp Blaz (MCBCB) proposed in this PA memo. I urge NAVFAC to consider and address both the concerns and questions proffered by this comment before moving forward with any of the projects proposed in the PA. Although the proposed facilities are considered necessary to support operational needs, there remain significant gaps in information that deprive the public of full transparency and do not appropriately address environmental or cultural preservation concerns.

Firstly, the information contained in the PA memo is insufficient for the general public to fully understand the potential impacts of the proposed project on both cultural resources and the environment. A significant amount of supplementary research is required, and although a list of references is included, not all of the documents are easily accessible online- and none are directly provided by NAVFAC in the PA itself. Source materials should have been readily available on the PA, in the form of either links or attachments, to provide clarity, transparency, and ease of access to the public. This concern has been brought forward to NAVFAC in previous public comments for PA memos, but does not seem to have been addressed. For NAVFAC to prove its commitment to enable public participation, it must establish the consistent practice of providing all source documents/materials and making supplemental information readily available. I am also concerned over whether plans for a 'recycling center facility, solid waste transfer station



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building, administrative building, parking, operational vehicle loading area, and supporting utilities' should be considered "individual undertakings" that require separate PA memo processes.

The PA memo references J-001B Utilities and Site Improvements (U&SI) archaeological investigations/studies, identification efforts for historic properties, previous mitigation projects, and a 2018 resolution for post-review discoveries; but the memo does not describe the details of said investigations, studies, discoveries, or mitigation tactics. The PA needs to clarify what exactly, if anything, was previously found at the Area of Potential Effects (APE)— considering it exists within an area which contains historical and cultural properties and objects. Additionally, I believe that a separate archaeological study/investigation should be conducted for the APE, located in the P-320 area, rather than rely on a previous study of the general area.

The APE is located on a limestone plateau within the area of Finegayan, previously known as Machanao. There are about nine archaeological sites eligible for nomination to the National Register of Historic Places within this general area alone (Amesbury, MARC). Plus, the Guam and CNMI Military Relocation EIS (2010) stated "construction at NCTS Finegayan has the potential to require the removal of natural resources of cultural concern" (Guam and CNMI Military Relocation FEIS, 2010, pg. 12-9). The list of references for identification efforts in and near the APE from previous studies must be provided to the public. Information, studies, and plans regarding historic properties should be made available to the public based on "project-specific APEs for direct and indirect effects" as stipulated in stipulation IV.E.2 of the 2011 PA (Programmatic Agreement, 2011). Furthermore, oversight of investigations and PA procedures must be heavily enforced. A 2019 KUAM article titled "SHPO told of new archeological finding at Machanao," reported that Guam's former SHPO was "surprised to see the artifacts at one site had already been removed," with a CHamoru ax/adze found freshly broken at the site. After said discovery, the former SHPO had to request that military parties not remove artifacts from the latest sites before a work plan could be approved (KUAM, 2019). This behavior by military parties is extremely concerning and must be prevented at all costs.

Another pervasive issue is that it remains unclear whether concurring parties of the 2011 Relocation PA have provided their opinions or advice on this specific memo. Although the Guam Legislature is listed as a concurring party, I am unaware of any ongoing activities related to the PA's consultations, annual workshops, or advisement periods, and am typically only updated when public comment periods such as this are initiated. The leadership and



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representatives of Guam should have a direct seat at the table, in order to provide optimal access to the public to all projects facilitated by this PA and its subsequent memos. Furthermore, with the dissolution of certain groups since 2011, such as We Are Guahan, my office suggests inviting newer and active CHamoru advocate groups as concurring parties to the 2011 Programmatic Agreement.

Lastly, there is no information regarding whether these proposed projects will also follow the National Environmental Policy Act (NEPA) process. This is significant because the project involves trash collection/accumulation, recycling, grading/excavation, etc. which all relate to environmental challenges such as landfilling, the capacity of local recycling facilities, and potential erosion and groundwater contamination. The community requires additional information to truly understand the project's environmental impacts, including:

- Facility operation and maintenance plans for each facility proposed in the PA, including:
 - Facility construction and design,
 - Facility capacity and expected operating life,
 - The expected number of workers at such facilities and the need for wastewater facilities (i.e. wastewater infrastructure, expected amount of wastewater accumulation, and plans for disposal of such),
 - Waste composition and weight/volume,
 - Procedures for handling hazardous waste, oil, paint, pesticides, and other wastes that are typically not accepted at solid waste transfer station facilities or recycling facilities,
 - Emergency or contingency procedures (in response to fires, storms/stormwater runoff, groundwater contamination, etc.)
 - Comprehensive mitigation plans and procedures to address erosion, stormwater runoff, flooding, and construction designs for water drainage systems, as well as plans for protecting groundwater and the Northern Guam Lens Aquifer (NGLA) from runoff contamination and leachate to meet standards of the Safe Drinking Water Act;
- The Layon landfill's capacity to accept waste from the proposed solid waste transfer station, especially as the number of servicemen increases. Will DoD contribute funds to the Guam Solid Waste Authority for the construction of new landfill cells to accommodate an increased volume of waste received?;



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- The capacity of the proposed recycling facilities (by weight/volume), what items are expected to be recycled (e.g. plastic, glass, paper/cardboard, electronics/e-waste) and proposed end-use/markets for the resultant products, whether these recyclables will be shipped off-island or stored, the potential for air pollution and water contamination and its effects on the surrounding environment, and the expected rate of waste diversion from the landfill (will it meet the DOD's policy of 40% diversion of non-hazardous waste?);
- The expected additional strain on Guam's infrastructure such as power, water, and wastewater infrastructure;
- Plans for the use of green waste derived from landscaping, grading, and construction;
- The presence of flora and fauna, especially limestone forests, within the APE that is expected to be impacted by construction and grading, and procedures to comply with the Endangered Species Act (ESA);
- The presence of *ãmot* (traditional medicine) and other culturally important flora within the project-specific APE (P-320), and procedures to allow traditional healers and cultural artisans access to these plants; and
- Cumulative impacts from multiple ongoing projects within the Marine Corps Base, alongside this proposed initiative; etc.

No information has been provided or disclosed to the public regarding environmental impacts or planned mitigation efforts for these specific projects, because plans for them were identified **after** the preparation of the relocation FEIS and Appendix E of the 2011 relocation PA. Please advise on if NAVFAC will follow the NEPA process for projects planned in this memo. If this is not the next expected step, then I respectfully urge NAVFAC to follow the NEPA process by providing an Environmental Impact Statement and facilitating public review of the proposed projects.

Pursuant to the Guam Zero Waste Masterplan and island-wide Zero Waste implementation plan, local policies regarding recycling, waste diversion targets, and zero waste initiatives aim to reach 50% and 75% waste reduction by 2035 and 2045, respectively (Article 3, Chapter 51, Title 10 of the Guam Code Annotated). Other local zero waste policies include Public Law No. 34-110 (2018), which bans single-use carryout plastic bags at certain retail establishments; and Public Law No. 30-221 (2010), which would have established the Guam Beverage Container Recycling Act, a container recycling deposit program under the Guam Environmental Protection Agency (P.L. 34-100; P.L. 30-221). The Navy Exchange (NEX) has



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yet to participate in the plastic bag ban and the latter public law's implementation has been delayed until a 'Memorandum of Understanding or other agreement is executed by GovGuam and DoD representatives.' NAVFAC and the Government of Guam should collaborate more often on promoting recycling, composting, and other green initiatives, in order to show their joint commitment towards a healthier and cleaner Guam. Therefore, I highly recommend that NAVFAC consider complying with local zero waste policies, assist in implementing the aforementioned public laws, and, when possible, provide funds for the implementation of newer recycling and composting initiatives that can benefit both military and civilian families.

In conclusion, new archaeological studies and investigations should be conducted within the project-specific APE (P-320), along with implementation of the NEPA process, due to the high cultural and environmental value of limestone areas within Finegayan. Documents listed in Enclosure 1 should be more readily available/accessible to the public; please provide these in a separate document or memo with either direct links or as attachments. Other important resources that should be disseminated include the Guam Synthesis and the Cultural Landscape Report for Northern Guam (which focuses on installations affected by the relocation in Northern Limestone Plateau and include Finegayan). Cultural objects of significant importance are not limited to property or material items; great care must also be provided in ensuring that the community is aware of the potential presence of native and endangered flora and fauna or *amot*. I further recommend that NAVFAC comply with local zero waste policies, to assist the island in reaching its goal of 75% waste reduction by 2045 and to provide both military and civilian families with a cleaner and healthier environment. Lastly, I respectfully request that NAVFAC invite newer and active CHamoru advocate groups as concurring parties to the 2011 relocation PA, and to more directly include the Guam Legislature in consultations regarding the same.

Si Yu'os Ma'ase,

Sabina Flores Perez
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Senator, *I Mina'trentai Ocho Na Liheslaturan Guahan*



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Amesbury, J. "Archaeology at North Finegayan, Guam." Micronesian Archaeological Research Services.

https://www.academia.edu/122454608/Archaeology_at_North_Finegayan_Guam

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https://guambuildupeis.us/documents/final/volume_5/vol_05_ch12_cultural_resources.pdf

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).

<https://www.mcbblaz.marines.mil/Portals/222/Documents/Environmental/2011%20Programmatic%20Agreement.pdf?ver=3X4nQGivYyKUqf2-hd8X6BA%3d%3d>

KUAM News. (2019). "SHPO told of new archaeological finding at Machanao."

<https://www.kuam.com/story/40656167/shpo-told-of-new-archeological-finding-at-machanao>

Article 3, Chapter 51, Title 10 of the Guam Code Annotated. "Revolving Recycling Fund."

<https://www.guamcourts.gov/compileroflaws/GCA/10gca/10gc051.PDF>

Public Law 34-110. (2018). "Choose To Reuse: Mungnga Ma Ayek I Plastek Act of 2018."

https://www.archives.guamlegislature.gov/34th_Guam_Legislature/Public_Laws_34th/P.L.%20No.%2034-110.pdf

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