

From:
Sent: Tuesday, July 14, 2020 10:43 PM
To: CRIWebComment
Subject: [Non-DoD Source] Public Comment

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete

information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

From:
Sent: Thursday, July 2, 2020 7:31 AM
To:
Subject: FW: [Non-DoD Source] Public Comment for Project J-017

From:
Sent: Friday, June 19, 2020 2:25 AM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Public Comment for Project J-017

Hafa adai,

My name is Tasi Ada from Asan-Ma'ina, Guam. Listed below (in bullet form) are my comments that I want to submit on Project J-017.

- Project J-017 should have local experts and advisers on military statements regarding the military buildup on Guam.
- Status reports need to be provided to Guam's local government; specifically the local government officials responsible for oversight of the military buildup.
- Additionally, a plan for increased local oversight over the Northern Guam Lens Aquifer should be established.
- The overall oversight should include site visits, mitigation efforts, and detailed maps from the military historic sites on Guam's military bases.
- Future Department of Defense plans on islands should be assessed by the Government of Guam and other pertinent local organizations as well.
- Village-wide town halls on these issues/plans/projects need to be conducted more often and at more convenient times for the community to attend and voice their concerns.

The prevention of further disruption of ancient sites and the preservation of historical sites that are set in place is what I hope the mentioned comments can aim to achieve.

Tasi Ada

Carlana Aguon

July 15, 2020

Via electronic submission to:
criwebcomment@navy.mil

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

**RE: J-017 Area Distribution Nodes and Site Telecom Cabling Project –
Design/Construction**

Håfa Adai, and thank you for the opportunity to submit comments in response to the J-017 Area Distribution Nodes and Site Telecom Cabling Project proposed in the Finegayan area of Guam. As discussed in detail below, I strongly oppose the findings and conclusions in the PA Memo, as it does not meet the applicable requirements under Section 106 the National Historic Preservation Act¹ (NHPA), fails to honor the DoD's duties and responsibilities in the Programmatic Agreement,² dated March 9, 2011, and the NHPA's implementing regulations, 36 CFR part 800.

I. Background

I was born and raised on Guam into a family that served in the U.S. military for generations. My father served in the U.S. Air Force during the Vietnam War, my grandfather, who was also awarded the Purple Heart Medal, served in the U.S. Army during the Korean War, and my great great grandfather served in the U.S. Marines during the Spanish-American War. In addition, my sisters served in the U.S. Army and U.S. Navy respectively early in their careers. Naturally, I am grateful for the protection of the United States and its military and the opportunities provided to my family and our island. However, I am concerned that the DoD may be failing to protect the historic and cultural property values in Finegayan.

¹ 54 U.S.C. §§ 300101 et seq.

² "Programmatic Agreement for Military Relocation to Guam and the Commonwealth of the Northern Mariana Islands," dated March 2011

II. Section 106 Process

The NHPA is the main federal law that requires federal decision makers, such as the Department of Defense, to preserve historic properties.³ Under Section 106, DoD must take into account the effects of undertakings they carry out, assist, fund, or permit on historic properties and to provide the public a reasonable opportunity to comment on such undertakings.⁴ It is important to recognize that Section 106 is a procedural requirement to ensure that agencies take into account the impact of their actions on historic properties, while offering the general public a means to enforce the agency's obligations through comment.⁵ These requirements can be governed in a Programmatic Agreement (PA) among parties, which must be implemented and complied with.⁶ As such, the terms of the PA govern the procedures concerning J-017, and must be honored by the DoD.

III. Concerns with the Section 106 Process

Below are my comments that address concerns with the Section 106 Process; and requests for information regarding the DoD's findings and determinations.

1. Comment #1: Public does not have access to information relating to mitigation efforts for GHPI Sites: 66-08-2303, 66-08-2305, and 66-08-2307.

In regards to the project proposal listed in the J-017 PA Memo #1, there are a few items concerning the measures to avoid, minimize, and mitigate adverse effects to the three (3) sites listed as Guam Historic Preservation Inventory: Sites 66-08-2303, 66-08-2305, and 66-08-2307 which are "treated as eligible for listing in the National Register of Historic Places (NRHP)."⁷

Under PA Stipulation V.A.1.b., Project J-017 "will have adverse effects on historic properties."⁸ The PA outlines procedures that must be followed when mitigating adverse effects on historic properties. As a historic property, Stipulation IV.E.2 requires DoD to "make information available to the public and request the public's input regarding the identification and evaluation" of Project J-017.⁹ DoD is required to make specific information available using "a publicly accessible Cultural Resources Information (CRI) website"¹⁰, including "archaeological and architectural surveys and evaluations . . . to avoid, minimize and mitigate adverse effects to historic properties[.]"¹¹

³ 54 U.S.C. §§ 300101 et seq.

⁴ 54 U.S.C. § 306108.

⁵ 36 CFR §§ 800.3 to 800.13.

⁶ 36 CFR § 800.14.

⁷ J-017 PA Memo, page 4

⁸ PA Stipulation V.B.3

⁹ PA Stipulation IV.E.2.a

¹⁰ PA Stipulation IV.E.2

¹¹ PA Stipulation V.A

In reviewing the documents available from the Cultural Resources Information section of the NAVFAC website, there are documents missing as well as a few discrepancies between available documents. To gain an understanding of the proposed project, its design, and its effects on the historical sites and cultural resources within the proposed area, I request that the Naval Facilities Engineering Command Pacific address the items listed in the following sections and make available to the public for review and comments before moving forward with this project:

- Appendix D (architectural and archaeological surveys) is not available on CRI Website and must be made available. Appendix D, which “provides a list of all archaeological and architectural surveys as part of the FEIS, an overview of completed surveys, areas of known sensitivity, and identified historic properties”¹² is missing from the website.
 - The public needs to know the locations of buildings/developments and their proximities to the historical sites mentioned.
 - The PA Memo’s information and maps contain insufficient information regarding how the specific GHPI sites will be influenced by the “scale and nature” of the undertaking and must be clarified by the DoD¹³.
- Appendix E is not available on CRI Website and must be made available. Appendix E, summary of results of DoD recommendations and status of SHPO review is missing from the website.
- All annual updates to Appendix E must be publicly available. Under PA Stipulation IV.E., “Consistent with the process defined below, as part of each year’s annual review of projects (see Appendix E), DoD will seek additional information . . . regarding historic properties in project areas . . . prior to finalizing determinations of eligibility[.] DoD will update Appendix E annually to reflect the review of such additional information on identification and evaluation of historic properties.” The annual updates to Appendix E must be provided on the CRI Website.
- Architectural and archaeological assessments noted on page 2 of the J-017 PA Memo are missing on the CRI Website.
- Data recovery plans must be publicly available. DoD noted that it would provide “data recovery plans subject to additional review prior to taking action that could affect these historic properties.”¹⁴ This is not available online to ensure the mitigation plans are in compliance.

¹² PA Stipulation IV. A

¹³ PA Stipulation IV.B

¹⁴ PA Stipulation V.A.1.b.

- Numerous information is not provided in the CRI Website. The public lacks information regarding the following items, which must be made available to assess the sufficiency of the evaluation of the historic properties:
 - Data Recovery Reports per Stipulation VI.A.2. Data reports are apparently complete but made unavailable to the public.
 - Excavation data per Stipulation VI.A.1.b.
 - All archeological Data & Surveys relating to the GHPI sites per Stipulation IV.B.
 - Architectural surveys per Stipulation IV.A.

2. Comment #2: DoD deprives the public of the opportunities to reasonable review and meaningful comment. Public does not have access to the appropriate “supporting documentation” regarding the identification efforts and must be provided to the public.

Federal regulations require DoD to provide on its CRI website: “information and appropriate supporting documentation regarding DoD’s identification and evaluation efforts and findings, in order to provide the public opportunities to comment.”¹⁵ The following supporting documents must be available on the CRI Website to give the public the opportunity to review:¹⁶

1. Athens, J. Stephen 2009 Archaeological Surveys and Cultural Resources Studies on Guam and the Commonwealth of the Northern Mariana Islands in Support of the Joint Guam Build- Up Environmental Impact Statement, Volume I: Guam. Prepared for Department of the Navy, Naval Facilities Engineering Command, Pacific, Pearl Harbor, Hawaii. International Archaeological Resources Inc., Honolulu, Hawaii.
2. Dixon, Boyd, Daniel Welch, Teresa Rudolph, Robert Jones, and Isla Nelson 2018 Archaeological Data Recovery in Support of the J-001B Utilities and Site Improvements at Naval Base Guam Telecommunications Site, Guam. Prepared for Department of the Navy, Naval Facilities Engineering Command, Pacific, Pearl Harbor, Hawaii. Cardno TEC, Inc., Honolulu.
3. Haun, Allan 1988 Archaeological Reconnaissance Survey and Field Inspections of Relocatable Over-the- Horizon Radar Sites on Guam, Mariana Islands, Micronesia. Prepared for Wilson Okamoto and Associates, Inc. Paul H. Rosendahl, Ph.D., Inc. Hilo, Hawaii.
4. Highness, D. and Allan Haun 1991 Archaeological Inventory Survey DTS Facility: Barrigada and Finegayan Sites, Dededo and Barrigada Municipalities Territory of Guam. Prepared for Belt Collins. Paul H. Rosendahl, Ph.D., Inc, Hilo, Hawaii.
5. Kurashina, Hiro, T. McGrath, and H. Manner 1987 Archaeological Survey of Areas 1, 2, 1A, and 2A at Northwest Field, Andersen Air Force Base and Naval Communication Area Master Station Western Pacific, Finegayan, Guam, Mariana

¹⁵ PA Stipulation IV.E.2.

¹⁶ PA Memo pages 3-4.

Islands. Prepared for Department of Navy, Pacific Division, Naval Facilities Engineering Command. University of Guam, Mangilao, Guam and Bernice P. Bishop Museum, Honolulu.

6. Naval Facilities Engineering Command Pacific 2015 Supplemental Environmental Impact Statement: Guam and Commonwealth of the Northern Mariana Islands Military Relocation. Prepared for Joint Guam Program Office, Washington, DC. Naval Facilities Engineering Command Pacific, Pearl Harbor, Hawaii.
7. Pacheco, R., T. Rieth, and R. DiNapoli 2020 Archaeological Monitoring in Support of J-001B Finegayan Utilities and Site Improvements Phase I, Naval Computer and Telecommunications Station, Guam. Prepared for Department of the Navy, Naval Facilities Engineering Command, Marianas, Santa Rita, Guam. International Archaeology, LLC., Honolulu.
8. Welch, D. 2010 Archaeological Survey and Cultural Resource Studies Conducted in 2007 on the Island of Guam in Support of the Join Guam Build-Up Environmental Impact Statement, 2 volumes. Prepared for the Department of the Navy, Pacific Division, Naval Facilities Engineering Command, Pearl Harbor, Hawaii. International Archaeological Research Institute, Inc., Honolulu.

By failing to provide the supporting documents, the DoD has deprived the public the opportunities to comment.

3. Comment #3: The Determination of Effect Lacks Insufficient Information and must provide additional information.

Because Project J-017 is listed on “Table E-2 of Appendix E,” Project J-017 “will be subject to further review to provide . . . the public with sufficient information” through a public process.¹⁷

- **Insufficient information of the “actions” that will potentially affect the historic properties.** To facilitate public involvement in the annual review process, DoD will post to the CRI website the summary memoranda (PA Memos) for public inspection[.]¹⁸ DoD will provide PA Memos to the public for comment prior to DoD authorization of . . . actions with the potential to adversely affect historic properties.”¹⁹ The PA Memo does not articulate the actions that will take place on the GHPI sites, nor does it articulate every action that will potentially affect the historic properties, which is broadly defined. The PA Memo must be revised to articulate each and every “action” that will potentially affect each and every “historic property.”
- **Insufficient information on maps.** “PA Memos will contain concise summaries of project information with a map showing the project footprint and results of cultural

¹⁷ PA Stipulation V.B.

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¹⁹ PA Stipulation V.B.

resources review, subject to the limitations defined under Stipulation IV.E.2.b.”²⁰ In order to understand adverse effects and the mitigation efforts mentioned in the PA Memos, we need to understand the overall design, construction and use of the proposed site area. Detailed maps should be provided showing historical site locations with site numbers referenced (i.e. 66-08-2303) in relation to the proposed master plan for the Telecommunications Station.

- Map detail should include:
 - Location of buildings that are proposed to be included in Project J-017.
 - More information on cultural resources review (not available)
- 4. Comment #4: The PA Memo does not include sufficient information on the determination of effects and any mitigation measures, thus PA Memo must be revised.**

If DoD determines that a project will have adverse effects on historic properties, DoD will provide an opportunity for the parties to the PA and the public to comment on DoD’s plan for resolving adverse effects. Stipulation V.A.1.b. (citing V.B.3). DoD fails to document its findings regarding how the project will have adverse effects on historic properties. DoD should incorporate the following information for the public:

- Mitigation for adverse effects should have a nexus to the cause of the effect, such as connections between locations, type of historic resource, or type of impact with the proposed mitigation measure--Especially with respect to the human remains.
- Mitigation should be proportional to the adverse effect. Greater damage should result in greater mitigation, while minor effects can result in lesser levels of mitigation.
- Mitigation should have a benefit to the impacted parties (e.g. loss of a CHamoru cultural resource such as property in of itself and should be mitigated by a benefit to CHamorus; loss of a contributing structure in a district should be mitigated by a benefit to the island), and
- Mitigation should have a benefit to the larger public (e.g. improve understanding or education; provide new opportunities for preservation results; improve preservation systems to avoid future conflicts or losses).

The goal is to mitigate adverse effects relevant to each site “to understand, protect and celebrate its unique history, and to preserve the unique characteristics and significance for the current users and future generations.” (Source: Mitigation for Adverse Effects to Historic Properties, Historic Hawai’i Foundation). DoD fails to deliver sufficient information to suggest that the history at Finegayan is preserved through mitigation.

²⁰ PA Stipulation V.B.

5. Comment #5: The mitigation measures in the form of Public Education and Interpretation does not use all information recovered at the sites, and therefore fails to properly mitigate adverse effects.

The PA Memo claims that “mitigation for Sites 66-08-2303 . . . and 66-08-2307 has been completed[.]” The PA Memo also states “Mitigation efforts for J-001B included data recovery, development of a public education and interpretation booklets in English and Chamorro, and updated GHPI data forms.”²¹ However, there are a number of mitigation measures under Stipulation VI.B. that are not honored.

While the CRI Website provides “Public Education” documents for a select number of GHPI sites, Project J-017 does not have Public Education and Interpretation documents for GHPI 66-08-2303 and 66-08-2307. Most significantly, human remains were found on GHPI Site 66-08-2303 and GHPI Site 66-08-2307. The findings of human remains must be honored and respected in a public education document, consistent with Stipulation VI.B.

Thus, DoD must revise Insufficient/Inaccurate Information Provided in Public Education Documents in a manner that:

- Completely reflects accurate Inventory of Artifacts - Must mention human remains, ceramics, and oven, and any other artifact that was discovered on the historic property.
- Provides photos of farmstead. There needs to be sufficient and accurate information regarding the Farmstead, Site 66-08-2551. The information sheet mentions aerial photographs however there are no aerial photographs shown.
- Honors the names of the CHamoru families that once took care of the land prior to military ownership. The public education documents place emphasis on trash, i.e., glass bottles and there is no mention of the CHamoru families who lived in the area. Guam is very family oriented and connections are made through last names or family names.
- Demonstrates map data showing overall project area, historical site locations within the project area, and findings for each location. This is to preserve and memorialize the memory of the historic properties, including artifacts.
- Provides an individual booklet for each historical site written in the CHamoru and English language. Again, Stipulation VI.B.1. requires “[a]n information package in booklet form in English and Chamorro, and posted on the CRI website, that includes:
 - images,
 - a summary of the work done,
 - including a summary of any excavations, materials and data recovered, and
 - a statement of the significance of the site to the regional culture.”
- Public education and interpretation booklets each include 1 page of information in English and 1 page of the same information in CHamoru. This is not by definition a “booklet” per Stipulation VI.B.1.

²¹ PA Memo, page 5

Public Educational documents are insufficient and need to be revised to include necessary information, ie, data recovered on the sites. Furthermore, every site referenced in the PA memo (ie GHPI Site 66-08-2303, and 66-08-2307) requires a separate booklet. DoD fails to properly mitigate the adverse effects by failing to provide public information documents. DoD's claim that the mitigation for J-017 "has been completed"²² is incorrect and unavailable.

6. Comment #6: Educational material Site 66-08-2305 must be revised to properly mitigate effects

The CRI Website provides educational material Site 66-08-2305, under Booklet 2 "Seabee Camp." However, the available material for Site 66-08-2305 must be revised to include information on newly discovered artifacts. At minimum the revisions must include the historic oven, and additional artifacts include Latte Period ceramic sherds.

Furthermore, a statement of significance needs to be rewritten. The PA memo requires that the statement relates "to the regional culture."²³ Unfortunately, the statement of significance makes no mention of the identified historic inventory on Site 66-08-2305 and its significance to the Marianas.

7. Comment #7: Educational material Site 66-08-2303 must be revised to properly mitigate effects

As briefly noted above, the Determination of Effect in the J-017 PA Memo states:

"Considering the information presented above, the DoD has determined that the design and construction of this project will not affect historic properties since NRHP eligible sites (GHPI Sites 66-08-2303, 66-08-2305, and 66-08-2307) have been mitigated per requirements under PA Memo #2 for J-001B Utilities and Site Improvements Phase I dated December 9, 2014) (Dixon et al. 2018) and archaeological investigations for areas identified during archaeological monitoring are nearing completion and all archaeological research will be finished prior to the start of J-017 construction."²⁴

The PA Memo again states that "Mitigation efforts for J-001B included data recovery, development of a public education and interpretation booklets in English and Chamorro, and updated GHPI data forms."²⁵ The Archaeology of Northern Finegayan Guam is part of a series of documents created for public education and interpretation booklets included in the mitigation efforts as noted in the J-017 PA Memo. However, the Archaeology of Northern Finegayan Guam

²² PA Memo, page 5

²³ PA Stipulation VI.B.1

²⁴ PA Memo, page 5

²⁵ PA Memo, page 5

document fails to mention that there were five fragments of human remains at Site 66-08-2303 as mentioned in the J-017 PA Memo. This document must be revised for proper mitigation.

V. Conclusion

For the reasons explained above, I, the undersigned, urge the U.S. Navy and the Department of Defense to refrain from continuing forth with Project J-017 of The Mariana Islands Testing and Training (MITT) project. The PA Memo does not meet the applicable requirements under Section 106 the NHPA, fails to honor the DoD's duties and responsibilities in the Programmatic Agreement,²⁶ dated March 9, 2011, and the NHPA's implementing regulations, 36 CFR part 800.

Si Yu'os Ma'åse - thank you - for considering my comments.

Respectfully Submitted,



Carlana Aguon

²⁶ "Programmatic Agreement for Military Relocation to Guam and the Commonwealth of the Northern Mariana Islands," dated March 2011

Comment # 4

From:
Sent: Thursday, July 2, 2020 7:40 AM
To:
Subject: FW: [Non-DoD Source] Project J-017

From:
Sent: Monday, June 29, 2020 3:39 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Project J-017

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity public review prevented meaningful public information, involvement, comments, and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding build project in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Tatiana Ananich

From:
Sent: Saturday, July 4, 2020 9:07 AM
To: CRIWebComment
Subject: [Non-DoD Source] Reconsider Project J-017

Hello, I am writing with concern about the harm Project J-017 will inflict upon the people, the land, and the history of Guam. The loss of three irreplaceable, invaluable cultural sites eligible for the National Register of Historic Places was already a display of extreme disrespect and disregard for their treasured history. Although I would rather the project be cancelled altogether as it is unnecessarily invasive to build yet another military base, I urge you to take a more respectful approach to this construction plan and work with the people of Guam. I, a citizen of the United States of America, stand with the community of Guam, and we demand the following to be instituted relative to buildup construction:

- 1) An assembly of local experts and advisors on military statements regarding the buildup.
- 2) Provide status reports on local government's oversight of the project, including site visits and mitigation efforts.
- 3) Establishing a plan for increased local oversight of the Northern Guam Lens Aquifer (a CRUCIAL geological feature of the island).

"The Northern Guam Lens Aquifer (NGLA) supplies about 80% of Guam's population with potable water. Protecting this vital resource from contaminants is crucially important both from a public health and sustainable development perspective. Contaminants can come from beneath the aquifer and from the land surface. Salty groundwater that underlies the aquifer is kept in its place by the weight of fresh groundwater sitting atop of it. If too much freshwater is removed by pumping, the amount of fresh water is reduced locally. That causes saltwater to move upward into the aquifer to achieve equilibrium. Contamination by seawater is a major risk in island aquifers. Other sources of contaminants are at the land surface. Domestic wastewater and sewage, industrial spills, and agricultural and stormwater runoff all have the potential of reaching the aquifer and contaminating it. Septic tanks and pit toilets are major sources of contaminants, and several thousands of these are located right above the NGLA. It is estimated that septic tanks alone discharge around 5 million gallons of wastewater into the Guam environment each day. The extent to which contaminants have impacted the chemical and biological integrity of the NGLA is currently unknown, but cannot be ignored, especially considering that the NGLA is a karst aquifer and much water within it moves rapidly through well-connected open spaces without being filtered." -Digital Atlas of Northern Guam

- 4) Assessing (or reassessing) future Department of Defense plans on the island.
- 5) Preventing further disruption of ancient sites and preserving historical sites.
- 6) Requesting detailed maps from the military of historic sites on base.
- 7) Assessing via local efforts the buildup's economic impacts to the island.
- 8) Conducting village-wide town halls on such issues.

Please take all of these requests into legitimate consideration. This beautiful island and its people should be treated with the utmost respect especially since the US Military has taken and gained so much from it without giving back anything substantial in return.

Thank you for reading.

Best,
A concerned citizen of the US advocating for the rights of indigenous people and their land

From:
Sent: Thursday, July 2, 2020 7:39 AM
To:
Subject: FW: [Non-DoD Source] Concerns of Project-J107

From:
Sent: Monday, June 29, 2020 3:31 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Concerns of Project-J107

Buenas yan Håfa Adai,

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Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding build project in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Noel Aquino

From:
Sent: Thursday, July 16, 2020 9:16 AM
To: CRIWebComment
Subject: [Non-DoD Source] Community input

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

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Senseramente,

Chloe Babauta

--

Chloe Babauta

Elyse-Noelle Torres Bais
Seattle, WA 98115

July 15, 2020

Via electronic submission to: criwebcomment@navy.mil

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

**RE: Project: J-017 Area Distribution Nodes and Site Telecom Cabling Project –
Design/Construction**

To whom it may concern:

Thank you for the opportunity to submit comments in response to the J-017 ADN and Site Telecom Cabling project that is planned to take place in Finegayan, Guam as part of the development of the Mariana Islands Training and Testing Study Area. As explained below, I strongly oppose DoD's identification efforts, findings, and determination of effect regarding historical sites. Therefore, I respectfully request that DoD:

- Not proceed with the proposal per its findings and determination; and
- Provide all information necessary to support its finding and determination accessible on the Cultural Resources Information (CRI) website.

1. INTRODUCTION

"Uno hit yan i tano', i tasi, i atdao, yan i langet." - CHamoru song *'Uno Hit'* by Jesse S. Bais
"We are One with the land, the sea, the sun, and the sky."

Håfa Adai, guahu si Elyse Bais, a native CHamoru woman of Guåhan. Guam, the largest island in the Mariana Island chain, will always be my home. The salt of the ocean has cleansed my skin, the fruit of coconut and bilembines (star fruit) has nourished my body, the love of my people has taught me values of respect, compassion and community, and the land has been the foundation where my ancestors cultivated the CHamoru heritage. Our CHamoru culture has been heavily diluted by the unbridled and harmful dominance of Spanish, Japanese and American colonizers, losing knowledge of our native language, traditional rituals, and ethnic identity.

As America's current military occupation expands, the threat to the CHamoru culture increases monumentally with every inch of sacred historical land that is destroyed. The land connects us to our CHamoru ancestors - it contains medicinal plants and trees, ancient paintings, and an array of precious artifacts like pottery, hunting and cooking tools, and ancestral burial sites. The historical land of the CHamoru people must remain undisturbed for the continued preservation of the culture and connection to ancestral roots. We, the CHamoru people, are one with our land, and harm to our land is harm to our people.

As a native CHamoru of Guam, I strongly object to the continued use and destruction of Guam's historical lands for the U.S. Navy's Mariana Islands Training and Testing (MITT), and its upcoming J-017 segment because of the reasons provided below.

2. NHPA Purpose and Section 106

The National Historic Preservation Act expresses a general policy of supporting and encouraging the preservation of prehistoric and historic resources for present and future generations, directing Federal agencies to assume responsibility for considering such resources in their activities.¹ The findings in NHPA include these:

(1) use measures. . . to foster conditions under which our modern society and our historic property can exist in productive harmony and fulfill the social, economic, and other requirements of present and future generations;

(2) provide leadership in the preservation of the historic property...

(3) administer federally owned, administered, or controlled historic property in a spirit of stewardship for the inspiration and benefit of present and future generations[.]²

NHPA places high importance on preservation of such resources. As such, the NHPA requires Federal agencies to consider the impact of their actions on historic properties. The NHPA provides a preservation scheme to accomplish these policies.

Section 106 requires each Federal agency to do two things prior to carrying out a project that may affect properties listed or eligible for listing in the National Register of Historic Places.³ First, the agency must consider the impact of the project on historic properties. Second, the agency must seek the Council's comments on the project. Section 106 is governed by regulations, codified at 36 C.F.R. part 800. The second step in the process is the identification of historic properties. 36 CFR § 800.4.

¹ 54 U.S.C. §§ 300101-307107.

² 54 U.S.C. §300101.

³ 54 U.S.C. § 306108.

3. COMMENTS

Comment #1: Destruction of Rare Historical Sites from the Latte Period Frustrates the Purpose of the National Historic Preservation Act

Contrary to the purpose of the NHPA, the Department of Defense (DoD) does not do a “reasonable and good faith effort” when it fails to identify historic properties in order to consider the impact of their actions on historic properties.⁴ Before there is an impact, DoD must identify historic properties and must make a “reasonable and good faith effort to carry out appropriate identification efforts, which may include background research, consultation, oral history interviews, sample field investigation, and field survey.”⁵ The PA Memo, the record, the CRI Website, and the lack of supporting documents shows that DoD disregards identification efforts.

“DoD recognizes the long and unique history of Chamorros on Guam and the importance of protecting and preserving the record of that history under Federal law⁶.” PA memo, page 2. Nevertheless, DoD fails to recognize the full scope of Finegayan’s significance to the CHamoru people and the passing down of cultural and historical knowledge of the island. Here, there is no evidence of oral history interviews regarding Guam Historic Preservation Inventory (GHPI) Sites 66-08-2303, 66-08-2305, and 66-08-2307.

This was land that was taken care of by the CHamoru people before it was taken by the Americans around World War II.⁷ The record does not show any effort to locate the former CHamoru owners so that they can tell their story for the purposes of preservation. DoD appears to make no attempt to preserve the names of the CHamoru families that used to live on the Finegayan lands and their historical significance. The PA Memo, the available supporting documents, and the CRI Website is completely empty of any oral history interviews and meaningful CHamoru history documentation. Although the DoD appears to have conducted surveys and research, their results do not fully portray the history of Finegayan. DoD must “take the steps necessary to identify historic properties” within the Area of Potential Effect (APE), and the “cultural significance to properties” within the APE. Accordingly, DoD needs to conduct oral history interviews with the CHamoru people with “reasonable and good faith efforts” pursuant to Stipulation IV.C.

Two of the three historical sites noted in the J-017 PA memo⁸ are from the Latte Period, which is generally perceived as the last indigenous CHamoru cultural era, making these sites very sacred spaces for the CHamoru people. These significant sites are rare on the small 212 square foot island,

⁴ See Exec. Order No. 13,175 (Nov. 6, 2000), reprinted 65 Fed. Reg. 67249 (Nov. 9, 2000).

⁵ 36 CFR 800.4(b)(1); Stipulation IV.E.

⁶ Military Relocation to Guam and the CNMI PA Memo

⁷ Guam History: Perspectives Volume One,” (Lee D. Carter; William L. Wuerch, and Rosa R. Carter, 1997); See Chapter by Carlos P. Taitano (pp. 247-282).

⁸ J-017 Area Distribution Node and Site Telecom Cabling Project PA Memo #1

and destroying them would undoubtedly put the CHamoru people at a loss forever. Constructing military infrastructure on this land would be sacrilegious and disrespectful towards our ancestors, our culture, and our people.

GHPI Site 66-08-2303: large Latte Period site; human remains and artifacts dating from 1615 and 1707

GHPI Site 66-08-2307: Latte Period site with artifact scatter; human remains and artifacts dating from 800 and 1521

Destruction of the sites frustrates the purpose of the NHPA, especially when there is no oral history interviews or discussions with the CHamoru people memorialized in the record. Instead of preserving and protecting “the long and unique history of Chamorros on Guam,” DoD misses significant marks with Section 106 compliance and goes against the purpose of the NHPA.

Comment #2: Irreversible Damage to Guam’s Ecosystem and Limestone Forest and Lack of Mitigation Measures Contravenes the NHPA

Contrary to the purpose of the NHPA, the DoD fails to make a “reasonable and good faith effort”⁹ when it did not consider the impact of their actions to the limestone plateau as provided in the PA Memo. DoD’s efforts to identify historic properties fails to commensurate with the assessment of other environmental factors.¹⁰ “Historic property means any. . . site. . . eligible for inclusion in the National Register of Historic Places maintained by the Secretary of the Interior.”¹¹ Project J-017 is located on a limestone plateau which is historical property¹². But there are no records provided by the DoD that connect the cultural significance of the limestone property with the CHamoru people.

Guam’s ecosystem is very sensitive - the continued destruction of land and construction of military facilities will have profound negative ecological effects on the island. In a National Geographic article, “Guam’s Ecological Fate is In the Hands of the U.S. Military”, it is noted that 1,000 acres (roughly 8%) of the island’s remaining native limestone forest will be destroyed as a result of the military’s expansion. The J-017 project has a total APE of approximately 57 acres and is located at NBGTS, which is situated on a limestone plateau. Guam Senator Sabina Perez affirms, “Our limestone forest, which covers about 10 percent of Guam where it once covered 50 percent, is a natural wonder that took millennia to evolve. It is **part of the natural and cultural heritage of the**

⁹ See Exec. Order No. 13,175 (Nov. 6, 2000), reprinted 65 Fed. Reg. 67249 (Nov. 9, 2000).

¹⁰ 36 C.F.R. § 800.8(c)(1)(ii) & 36 C.F.R. § 800.8(c)(1)(iv); NEPA and NHPA: A Handbook for Integrating NEPA and Section 106 (March 2013) at 44 *available*:

[https://www.achp.gov/sites/default/files/2017-02/NEPA NHPA Section 106 Handbook Mar2013 0.pdf](https://www.achp.gov/sites/default/files/2017-02/NEPA%20NHPA%20Section%20106%20Handbook%20Mar2013%200.pdf)

¹¹ 36 CFR § 800.16(l)(1).

¹² J-017 Area Distribution Node and Site Telecom Cabling Project PA Memo #1

indigenous people... It is sacred to us, and we must preserve it for future generations.”¹³
Irreversible destruction to the limestone forests must not continue on Guam.

The PA Memo fails to provide maps of the limestone plateau. Stipulation V.B.1. The PA Memo further fails to explain with sufficiency in the Determination of Effect, how the “design and construction of this project” such as “grading, digging, trenching, drilling, boring and/or cut and fill to construct two single-story ADNs” will not affect historic properties, such as the limestone plateau. DoD does not provide mitigation efforts to preserve this cultural and natural heritage of the CHamoru people.

Comment #3: DoD Lacks Transparency on “Enhancement” Efforts

The supporting documents of the PA Memo fail to provide plans for areas of enhancement. As required by the Endangered Species Act, for every acre the Department of Defense razes for new construction, it must “enhance” and restore another acre as part of ecological conservation¹⁴. The Navy has not publicly released any plans for areas of “enhancement” specific to the J-017 project. Prior to each building project phase, the public should be duly informed of *where* “enhancement” sites will be, *when* “enhancement” will start, and *what* the “enhancement” will entail. Once limestone forests are destroyed as a result of project J-017, the “enhancement” efforts will be completely ineffective in restoring something of similar significance. Haldre Rogers, an ecology and biology professor at Iowa State University who studies the Mariana Islands, states “one acre of ‘enhanced’ forest is nowhere near as valuable as a few acres of the last remaining limestone forest.”

¹⁵

Comment #4: DoD Fails to Fulfill its Section 106 Responsibilities Due to Lack of Availability/Access to Critical Public Documents

The PA Memo process suffers from a major procedural defect that requires the extension of the comment period to provide the public with a meaningful process. If the agency official makes a “no historic properties affected” finding, the agency must in pertinent part:

- document the finding; and
- make the documentation available to the public.

¹³ Alexandra Ossola, ‘Guam’s Ecological Fate is In The Hands of the U.S. Military’, *National Geographic*, Brooklyn, New York, 2018, pg. 5
<https://www.nationalgeographic.com/environment/2018/12/guam-endangered-species-ecology-threatened-us-military-base-expansion/#close>

¹⁴ Naval Facilities Engineering Command Marianas Public Affairs Office, ‘Navy’s Plan for Marine Corps Training Rangers on Guam Safeguards the Environment’, *United States Navy*, Washington, DC, 2017, Story Number NNS170829-10: https://www.navy.mil/submit/display.asp?story_id=102176

¹⁵ Alexandra Ossola, ‘Guam’s Ecological Fate is In The Hands of the U.S. Military’, *National Geographic*, Brooklyn, New York, 2018, pg. 5
<https://www.nationalgeographic.com/environment/2018/12/guam-endangered-species-ecology-threatened-us-military-base-expansion/#close>

36 CFR 800.4(b). As a requirement, the DoD must make information readily available on a “publicly accessible Cultural Resources Information (CRI) website”¹⁶, and include “archaeological and architectural surveys and evaluations . . . to avoid, minimize and mitigate effects to historic properties[.]”¹⁷

Here, the DoD has failed to uphold access to critical public information referenced in the J-017 PA memo on the required CRI website. The J-017 PA memo references “Appendix E” for portions of Guam subject to direct and indirect effects of the project. However, “Appendix E” (and “Appendix D” referenced in the PA for Military Relocation to Guam and the Commonwealth of the Northern Mariana Islands) is not available on the Navy’s website¹⁸. Thus, DoD fails to fulfill its Section 106 responsibilities.

On numerous occasions, I reached out to CRI Website personnel about the unavailability of the necessary documents. On July 9, 2020, after discovering that “Appendix D” and “Appendix E” were missing, I emailed ‘nitcooperationswatch@navy.mil’ to inform them that the documents were not available, and to determine when the documents would be added to the website for public viewing. I was given a ticket number which I checked on frequently for updates, however, even after my ticket was escalated, the documents were not added and it was still unclear whom to contact to add the documents.

The following email screenshots are true and correct copies of my email correspondences with CRI Staff.

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¹⁶ PA Stipulation IV.E.2.

¹⁷ PA Stipulation IV.A.

¹⁸

https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/cultural_resources/guam-and-cnmi-programmatic-agreement.html

Initial Email Sent to NITC on July 7, 2020 - Missing documents

Elyse-Noelle Bais [redacted] Tue, Jul 7, 12:12 PM (7 days ago) ☆ ↶ ⋮
to cristen.crawford, whitney.deloach, nitcooperationswatch ▾

Hi all,

Hope you have been well. I'm drafting a comment letter for the *J-017 Distribution Node and Site Telecom Project* taking place in Finegayan, Guam.

"Appendix D" and "Appendix E" are referenced in the *Guam and CNMI Programmatic Agreement*, however, these documents are not available on the Cultural Resources Information (CRI) website. [Link Here](#). Also attached is a screenshot showing the incomplete list of Appendices on the CRI website.

When will these documents be added to the website for public viewing? I'll need to review and reference "Appendix D" and "Appendix E" in order to submit a thorough and factually verified comment letter by the comment period deadline of July 15, 2020 (next week Wednesday).

Any quick help on this would be greatly appreciated as the deadline is fast approaching.

Thanks,
Elyse

First Follow up Email Sent to NITC on July 9, 2020 Re missing Documents

Elyse-Noelle Bais [redacted] Jul 9, 2020, 10:25 AM (5 days ago) ☆ ↶ ⋮
to M_NAVFAC_PRTN_NITC ▾

Hi Matt,

Thank you for the information! Do you have any updates on the Ticket 1365485? When will the documents be available for public viewing? I checked the website again and the appendices are still missing.

Hoping to review these documents as soon as possible so I can meet the comment period deadline of July 15, 2020.

Thanks,
Elyse

Email from NAVFAC July 11, 2020 Re unavailable documents for public

M_NAVFAC_PRTN_NITC Operations ... Jul 11, 2020, 2:57 PM (3 days ago) ☆ ↩ ⋮
to me ▾

Elyse,

Unfortunately we cannot provide a timeline as we do not work directly with the admins. I see that this ticket is taking some time and that is why I have add additional to the escalation.

Please let us know if you have any additional questions.

...

V/R,
Andrew E. Jimenez, Contractor
NITC Operations Watch
Service Desk Support Technician
Ops Watch 805-982-2555
Email: nitoperationswatch@navy.mil

Second Follow up Email, July 13, 2020 Re unavailable documents for public

Elyse-Noelle Bais [REDACTED] Mon, Jul 13, 10:11 AM (1 day ago) ☆ ↩ ⋮
to M_NAVFAC_PRTN_NITC ▾

Hi Andrew,

Hope you had a nice weekend. Any updates on ticket 1365485 since escalating?

Thanks,
Elyse

...

M_NAVFAC_PRTN_NITC Operations ... Mon, Jul 13, 10:18 AM (1 day ago) ☆ ↩ ⋮
to me ▾

Elyse,

The following note has been added to the STS ticket by Monica Harrer.

“ The link is to the public website for NAVFAC. NITC does not support or have access to modify the public website. I do not know who is responsible other than the site is hosted by CNI. Perhaps you can contact them? ”

...

The public lacks meaningful comment opportunities because of the failure to include necessary supporting materials for the public to review. The lack of transparency goes contrary to the democratic process for reviewing agency actions. Thus, DoD must provide the information to the public to comply with the NHPA, the PA, and the implementing regulations.

5. Archaeological Research and Investigations Are Complete, thus DoD's Basis For the Determination of Effect is Inadequate

As noted in the "Determination of Effect"¹⁹ section of the J-017 PA Memo #1, the archaeological research has not been completed or released for public review prior to the start of the J-017 construction. A "Determination of Effect" cannot be conducted thoroughly until all research pertaining to the historical sites have concluded and undergone proper comprehensive review.

DETERMINATION OF EFFECT:

Considering the information presented above, the DoD has determined that the design and construction of this project will not affect historic properties since NRHP eligible sites (GHPI Sites 66-08-2303, 66-08-2305, and 66-08-2307) have been mitigated per requirements under PA Memo #2 for J-001B Utilities and Site Improvements Phase I dated December 9, 2014) (Dixon et al. 2018) and archaeological investigations for areas identified during archaeological monitoring are nearing completion and all archaeological research will be finished prior to the start of J-017 construction.

Furthermore, there are additional missing materials regarding J-017. Specifically, DoD needs to include proper documentation for a "finding of no historic properties affected," including:

- (1) A description of the undertaking, specifying federal involvement, and its area of potential effects, including photographs, maps, drawings, as necessary;
- (2) A description of the steps taken to identify historic properties, including, as appropriate, efforts to seek information pursuant to § 800.4(b); and
- (3) The basis for determining** that no historic properties are present or affected.

36 CFR 800.11(d). The information referenced in the PA Memo's "Determination of Effect" is unavailable on the CRI Website. DoD fails to show "proper documentation" and fails to provide a **basis** as to how it reached its determination when it does not have finalized archaeological investigations and research.

DoD's documentation is inadequate with respect to its determination of effect. "The agency official shall ensure that a determination, finding, or agreement under the procedures in this subpart is supported by sufficient documentation to enable any reviewing parties to understand its basis." 36 CFR § 800.11(a). DoD needs to extend the public comment period in compliance with the documentation standards and all federal laws and regulations pertaining to J-017.

¹⁹ J-017 Area Distribution Node and Site Telecom Cabling Project PA Memo #1

4. CONCLUSION

For the reasons explained above, I, the undersigned, urge the U.S. Navy and the Department of Defense to refrain from continuing forth with Project J-017 of The Mariana Islands Testing and Training (MITT) project.

Respectfully Submitted,

A handwritten signature in black ink that reads "Elyse-Noelle F. Bais". The signature is written in a cursive, flowing style.

Elyse-Noelle Torres Bais

From:
Sent: Sunday, July 5, 2020 11:39 PM
To: CRIWebComment

Subject: [Non-DoD Source] Public Comment Project J-017

Buenas yan Håfa Adai,

I have lived on Guåhan all my life, currently live in Yigu, and currently attend the University of Guåhan. I am Filipino and not CHamoru, but I am writing this in hopes that you hear the voices of the indigenous people of Guåhan and not continue to desecrate the land of their ancestors, as well as their descendants. I do **not support** and adamantly **reject** the build-up, and I urge you to read this letter.

I am deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

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cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

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Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente, Serena

Military Relocation PA Memo Comment Form

2020

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 outlined 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: I-017 Area Distribution Nodes and Site Telecom Cabling Project - Design and Construction, Navel Base Guam Telecommunications Site (NBGTS) Guam

SUBJECT: I-017 Area Distribution Nodes and Site Telecom Cabling Project - Design and Construction, PA Memo # 1

Date: 7/3

Name: Joshua Barrigada

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: We demand increased transparency,
on disturbing cultural sites for all
military sites. We want the military to
create any projects where artifacts or
human remains are found.

Comment # 11

From:
To: [CRIWebComment](#)
Subject: [Non-DoD Source] MILITARY BUILD-UP
Date: Wednesday, July 15, 2020 7:24:22 PM

Hafa Adai,

I am Christine Bautista, a 17 year old resident of Guåhan and I ask of you all to stop the military buildup on my home. I am writing to you as a severely concerned citizen to end the constant militarization on our island.

Perhaps my email will not provide you the proper insight to the extreme disposition we have with the constant robbing of identity and land, but I need you to understand that we are tired. Imagine possessing a land completely—rightfully, you plan to expand your family there, your respects, practices, what have you. Imagine having that sacred land but being denied access to it because of a body of people who are deemed as superior than us civilians because of an expansion. An expansion that is not required in the slightest bit because there's been way too much land *already* stripped from us. An expansion that only affects the way of life that our ancestors intended us to live.

Not only are you terrorizing peaceful lands that belong to our ancestors, you are STRIPPING us of identity and peace.

You are disregarding the way in which we respect our lands — OUR lands. You are infecting and contaminating our waters, the waters that our children drink. You are affecting our air, our environment. You are stealing land that belongs to my family, my neighbors, my classmates.

Chamorro land belongs in Chamorro hands.

As someone from this island, as someone who stands strongly with the people who rightfully possess this island, I urge you to stop. You are causing irrevocable and irreversible harm.

Sincerely,
Christine Bautista

Comment # 12

From: [CIV USN NAVFAC PAC PEARL HI \(USA\)](#)
To: FW: [Non-DoD Source] Project J-017
Subject: Thursday, July 2, 2020 7:34:21 AM
Date:

From: Amber
Sent: Wednesday, June 24, 2020 1:43 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Project J-017

I am writing to you today as a mother, an educator, and indigenous person of this island that is deeply concerned for the future of my island, our sacred spaces, and our history. I am demanding that the following actions be taken seriously.

1. Requesting maps and descriptions of the historic sites to be provided to our local government and knowledge of what has been done to the artifacts and remains that have already been desecrated,
2. Complete halt on future clearings once an ancient site is discovered,
3. Local experts and local government officials to have complete oversight and given status regarding the Northern Guam Lens Aquifer and the buildup.

The continued desecration of our ancestral sites knowing well enough that it is eligible for the National Register of Historic Places, knowing well enough of the environmental impact this entire buildup will have on my island shows a lack of respect for the CHamoru people, our land, our seas, our culture, and our rich 4,000 year old history. The measures listed herein need to be addressed and executed.

Amber Benavente

Comment # 13

From: FW: [Non-DoD
To: Source] Comment
Subject: Thursday, July 2, 2020 7:32:33 AM
Date:

-----Original Message-----

From: Sabrina Bento
Sent: Saturday, June 20, 2020 7:00 AM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Comment

Hello,

Do not build on people's sacred land, you say it's not on their sacred land but it most definitely will be. You just don't acknowledge that. Stop taking advantage of native people!

-Sabrina Bento

From:
Sent: Wednesday, July 15, 2020 6:32 PM
To: CRIWebComment
Subject: [Non-DoD Source] Public Comment

Håfa adai:

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Kiana Blas Brown

From:
Sent: Thursday, July 2, 2020 7:42 AM
To:
Subject: FW: [Non-DoD Source] Project J-017

From:
Sent: Monday, June 29, 2020 6:27 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Project J-017

Buenas yan Hãfa Adai,

I am a concerned CHamoru living in Austin, Texas deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guãhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Jacob Blas

[Austin, TX 78705](#)

Comment # 16

From:
To: FW: Pruteh Litekyan
Subject: Thursday, July 2, 2020 7:43:17 AM
Date:

From:
Sent: Tuesday, June 30, 2020 5:16 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Prutehi Litekyan

Hello,

My name is Alina Bonto and I was a resident of Dededo for 18 years. I am demanding that Project J-017 which includes extensive land clearing of native historic sites, be canceled immediately. This is an attack on Chamoru's who have lived on Guam before the US Military ever set foot on the island. The military is stealing more land from it's native people... for a firing range. Cultural erasure is prominent in American history as seen in the nation's "founding", stealing and murdering Native Americans. History must not repeat itself. Cancel Project J-017 now. Return stolen land to it's rightful owners.

From:
Sent: Tuesday, July 7, 2020 7:36 AM
To:
Subject: [Non-DoD Source] Please stand with the people of Guam regarding sacred cultural sites
- Project J-017

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

--

Toni Brooks

Daughter of Matilda Pereda Pascual from Barrigada

Grand-daughter of Josefa Pereda Cruz from Agana Heights

From:
Sent: Wednesday, July 15, 2020 12:38 PM
To: CRIWebComment
Subject: [Non-DoD Source] Project J-017

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity as a CHamoru person. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site and in turn preserve our culture.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back. Our culture is already dying. We can not afford to let it perish. We must preserve our land and our artifacts and help it thrive once more.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers. We refuse sit in the dark and be fed lies of omission any longer.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue and listen to voices of Guåhan

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Reagan N. Budasi

From:
Sent: Thursday, July 16, 2020 8:46 AM
To: CRIWebComment

Subject: [Non-DoD Source] Destruction of Cultural Sites

Hello,

I am a concerned citizen deeply disturbed by the clearing of three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to indigenous culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of indigenous ancient burials and the permanent destruction of indigenous land, endangered species, and invaluable resources, including the risk of compromising the island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more sacred sites have been cleared for this marine base and other buildup projects? The indigenous community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on their cultural resources is a part of their identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of cultural sites or artifacts. As the community has stated many times prior, these special parts of indigenous identity must be preserved in place. We do not need another military base on their 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave local peoples guessing the whereabouts of their historical artifacts, remains of their ancient ones and remnants of their ancient past. Where is the military putting these artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? The community deserves to know these answers.

I urge SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

- Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community
- Assemble local experts and advisers on military statements regarding the buildup
- Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts
- Establish a plan for increased local oversight of the Northern Guam Lens Aquifer
- Assess future Department of Defense plans on island
- Prevent further disruption of ancient sites and preserving historical sites in place
- Request detailed maps from the military of historic sites on base
- Assess via local efforts the buildup's economic impacts to the island
- Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, the community has urged that these invaluable parts of their history be preserved in place.

Comment # 20

From:
To: FW: Project J-017
Subject: Thursday, July 2, 2020 7:2 :13 AM
Date:

From:

Sent: Friday, June 12, 2020 3:20 PM

To: CRIWebComment <criwebcomment@navy.mil>

Subject: [Non-DoD Source] Project J-017

It's incredibly troubling to learn of this expansion that has already taken up so much land from the Chamoru people, who have been commenting on this for so long, yet the US Military continues to show it does not care about the voices of Indigenous folk.

Not only were the Latte Period artefacts and human remains mishandled, but a 57 acre base is going to be built where an ancient Chamoru village of Magua once stood. This behaviour shows a pattern of little to no remorse for the people you are taking from, people who's land is deeply, culturally important to them. It shows a history of erasure and blatant disrespect not only of the land, but it's significance, and every Chamoru person who has to bare witness to said erasure. There's no humanity in that.

All military personnel on Guam must undergo cultural sensitivity training, and be taught Chamoru history and Indigenous rights, as they are basic human rights, but they have continued to ignore this, despite the constant efforts of Chamoru activists. It makes me wonder why have this period of welcoming comments at all, unless there will be genuine results from it. The least that can be asked is that there is acknowledgement of Chamoru people, and an end to the disrespect you have shown both them and their land, but as long as this project continues, you will only prove further the lack of empathy the military has shown.

Sent from [Mail](#) for Windows 10

From:
Sent: Wednesday, July 15, 2020 10:17 AM
To: CRIWebComment
Cc:

Subject: [Non-DoD Source] Comment on the proposed marine base at Litekyan

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,
Maria Cristobal Calori

Comment # 22

From:
To:
Subject: FW: [Non-DoD Source] UCLA Message | 7 June 2020 | Marine Corps Base in Dededo
Date: Thursday, July 2, 2020 7:2 :0 AM

From: KEITH

Sent: Sunday, June 7, 2020 10:26 AM

To: CRIWebComment <criwebcomment@navy.mil>

Subject: [Non-DoD Source] UCLA Message | 7 June 2020 | Marine Corps Base in Dededo

7 June 2020

Dear US Military,

Håfa adai and greetings. My name is Keith L. Camacho and I am a Professor in the Asian American Studies Department and a Faculty Affiliate in the Critical Race Studies Program at the University of California, Los Angeles. I also direct the [UCLA Guam Travel Study Program](#) during the summer wherein I train students for careers in community-based advocacy, research, and policy in Guam and greater Oceania. My extended family hails from the villages of Barrigada in Guam and Chalan Piao and San Roque in Saipan. My father, Juan Camacho, also retired as a Captain in the Guam Army National Guard and as a Lieutenant in the Guam Police Department. My younger brother, Christopher Camacho, is presently a Lieutenant Colonel and the Commander for the Guam Army National Guard's 105th Troop Command. My mother, Barbara Camacho, never joined the military but is aware of both the opportunities and inequities that the military fosters. While we hold differing views about the role of the US military, we all care for the archipelago, its people, and the environment.

In this regard, I am writing to protest the ongoing construction of the Marine Corps Base in Dededo and any related military projects now and in the future. As you may know, the US Department of Defense and the US Department of Interior, among other agencies, fund more than 2 billion dollars annually to support these efforts. On the other hand, US federal *and* local entities receive less money for medical care and education in Guam, a process that has, in fact, created a wider economic gap between the very wealthy and the very poor.

But why would you care. You are only on the island for 3 days, 2 years, 1 second. Besides, you are the ultimate protectors of democracy and world peace. You help people by killing their languages, stealing their lands, and murdering millions of innocent communities. But why would you care. Your medical insurance and salaries keep you happy. You have all the basic things that every person deserves. But why would you care. You "Make America Great Again." You bleed red, white, and blue. You are the best generation. But why would you care.

For the record, you do not care. May this message serve as another documented instance of US state violence and military dispossession on Guam, the Northern Mariana Islands, and Micronesia.

Comment # 23

From:
To: FW: [Non-DoD Source] Using my voice
Subject: Thursday, July 2, 2020 7:31:33 AM
Date:

From:

Sent: Friday, June 19, 2020 2:50 AM

To: CRIWebComment <criwebcomment@navy.mil>

Subject: [Non-DoD Source] Using my voice

Hafa Adai,

is how I start every statement I say to a stranger. The one phrase almost every resident of Guåhan understands. What if one day in the future, the next generations, dont understand what it means? And no one else will know, because the culture is lost. The culture and history, simply demolished within a few months. I'm young, a high school student who hopes that I can make a change.

A change within our community that saves my culture, my history, my heritage. Most of Guam is already occupied by the military. The ancient village about to be destroyed is one of the largest sites discovered. If saying that the artifacts found will be "saved for data" maybe leaving it in the original location will be "better for data". It was shown that one of the artifacts were human remains. Finding ancient remains like those can be extremely useful to educate other people on our culture but putting them in bags doesn't do anything.

Proceeding with this project doesn't only destroy a historical site that we may never have again, it also effects the islands main drinking water supply, The Northern Guam Lens Aquifer. Remember that we are a population of roughly 160,000 and most of those people live in the northern and central areas. That source supplies 80% of drinkable water.

This will also effect the surrounding islands, such as Saipan, Rota , Tinian and the other northern islands. During the crisis that we're currently facing, the people of the CNMI dont need anymore problems. The people of Guam dont need anymore problems either.

Like I stated before, I'm only I high school. Most of the comments you receive may be from people of a higher age than me. I'm young, I've only learned a handful of information about my culture, history, heritage and everything in between. My CHamoru peers aren't as familiar with their culture, and I wish to change that. To get people talking and learning about Guam's history and it's people. Most of us only know the basics but me, along with other individuals want to teach that to others. I want to let my future children and grandchildren and so on know that we fought for what we believed in. We tried to do something about the ancient Magua' village. So please, dont let the Magua' village be only a story I tell my children,leave it alone and let it be a place where they can connect with their ancestors and remember who they are. Si yu'os ma'åse. - Koel G. Camacho

From:
Sent: Thursday, July 16, 2020 8:36 AM
To: CRIWebComment

Subject: [Non-DoD Source]

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Sent from my iPhone

From:
Sent: Wednesday, July 15, 2020 2:20 AM
To: CRIWebComment
Cc:

Subject: [Non-DoD Source] Re: the destruction of Magua' Village & Litekyan

Buenas yan Hafa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity public review prevented meaningful public information, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising the island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other build up projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited three sites as eligible for the National Register of Historic Places under Criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B, and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and details mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, the remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that it does not deem "significant"? Our community deserves to know these answers.

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- Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community
- Assemble local experts and advisers on military statements regarding the buildup
- Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts
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- Assess future Department of Defense plans on island
- Prevent further disruption of ancient sites and preserving historical sites in place
- Request detailed maps from the military of historic sites on base
- Assess via local efforts the buildup's economic impacts to the island
- Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Paige Castro-Reyes
Familian Jeje, Gangoche yan Chegando

July 15, 2020

Cheerful Catunao¹
Seattle, WA 98118

SUBMITTED VIA EMAIL: criwebcomment@navy.mil

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

RE: PROJECT J-017 Area Distribution Nodes and Site Telecom Cabling Project –
(Design/Construction) PA Memo # 1 (REVISED REVIEW PERIOD), Naval Base Guam
Telecommunication Site (NBGTS), Guam

Håfa Adai:

Thank you for the opportunity to comment on the Military Relocation To Guam and CNMI Programmatic Agreement Memo (PA Memo) #1, dated June 1, 2020, regarding the above-captioned project. The PA Memo serves as a means for interested members of the public to provide the Department of Defense (DoD) public comment on:

1. the identification and evaluation of historic properties; and
2. the determination of effect.

As explained below, I **strongly oppose** the PA Memo and its findings and determination.

I understand that the DoD may have good intentions with proposing Project J-017. However, Project J-017 raises serious procedural and substantive concerns that need to be cured by the DoD. As explained below, the PA Memo's findings and determinations do not meet the requirements under the National Historic Preservation Act (NHPA), 54 U.S.C. §§ 300101-307107, its implementing regulations, 36 CFR § 800 et seq., and the 2011 Programmatic Agreement. Accordingly, I oppose the PA Memo's findings and determinations, and respectfully request that the Department of Defense (DoD) not proceed with the current proposal; highly urge DoD to re-initiate its identification, evaluation, and determination; extend the notice and comment period for Project J-017 until all archaeological research is complete; and provide all supporting documents relating to the determination on the CRI Website.

¹ I submit these comments in my individual capacity, as a private citizen, and as a former resident of Guam. The views expressed here are my own and do not in any way represent the views of my employer (past or present), entity, or group with which I associate.

I. INTRODUCTION

I was born and raised on the island of Guam, where my family currently resides. I am the descendant of a soldier that served the United States military during World War II and the Vietnam War. As part of the Department of Defense (DoD), several of my family members in Guam serve the US as military or civilian personnel. I am a former resident of *Hågat*, frequently visit Guam, and intend to return to my home one day.

Finegayan, or *Sabanan Fadang* in traditional CHamoru, is an area located in Northern Guam. Finegayan has a rich history and includes the Haputo Ecological Reserve Area. The Finegayan area covers about 3500 acres of land, however the DoD controls “2,952 acres” of land. My sister and many family members reside about five minutes away from the Finegayan areas that will be impacted by the Undertaking.

Former U.S. Assistant Secretary for the Navy B.J. Penn has called the action on Guam “the largest project that the Department of Defense has ever attempted.”² DoD’s undertaking for a new Marine Corps base at Finegayan has been reported to be “the most tremendous undertaking of the Realignment.”³ In this proposal, DoD seeks to impact Finegayan with possible “munitions and explosives of concern” in order to install cables, and construct buildings, roads, and associated site improvements.

Given this is expected to be the largest project ever attempted by DoD, I expected DoD’s efforts to comply with basic federal requirements to be equally as ambitious. Upon review of the available public documents, DoD’s Section 106 process is procedurally and substantively defective.

II. STATUTORY AND REGULATORY FRAMEWORK

Section 106 of the National Historic Preservation Act (“NHPA”) requires federal agencies to *take into account* the impacts of their proposed actions and decisions on *historic properties*, i.e., places that are to be included or are eligible for the National Register of Historic Places. *See* 54 U.S.C. § 306108 (emphasis added). Specifically, the NHPA’s Section 106 process provides:

The head of any Federal agency having direct or indirect jurisdiction over a proposed Federal or federally assisted undertaking in any State and the head of any Federal department or independent agency having authority to license any undertaking, prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license, *shall take into account* the effect of the undertaking on any *historic property*.

54 U.S.C. § 306108.

² Jeffrey W. Hornung, *The U.S. Military Laydown On Guam Progress Amid Challenges*, (2017) (citing Ben Bohane, “Guam: America’s ‘Permanent Aircraft Carrier’ in the Pacific Ramps up Its Bases,” *ABC News Australia*, April 26, 2016, <https://www.abc.net.au/news/2016-04-27/americas-navy-airforce-bases-in-guam-ramp-up-construction/7360776>).

³ Hornung at 10. Available at: <https://spfusa.org/wp-content/uploads/2017/04/The-U.S.-Military-Laydown-On-Guam.pdf>.

Section 106 of NHPA is a “stop, look, and listen” provision that requires each federal agency to consider the effects of its programs. *See Apache Survival Coalition v. United States*, 21 F.3d 895, 906 (9th Cir.1994). The Section 106 requirement is implemented through regulations: “Protection of Historic Properties” (36 C.F.R. Part 800). However and in the alternative, Federal agencies may develop other “Program Alternatives” to fulfill their Section 106 compliance responsibilities, such as a Programmatic Agreement (PA). 36 CFR § 800.14. The basic steps in the process are: initiation of the process; identification of historic properties; assessment of adverse effects; resolution of adverse effects. 36 C.F.R. §§ 800.3- .6.

The purpose of the commenting period and the requirement of consideration of and response to comments is to make sure the public participation is meaningful and to require the agency to think through its proposed actions.⁴ By forcing agencies to think things through, the commenting process serves to discipline the agency and to act as a quality control mechanism.⁵ When an agency does not take comments seriously, it is acting in an arbitrary and capricious manner, and the rules it produces in such a process can be invalidated because they do not reflect reasoned deliberation.⁶ At the conclusion of the comment period, the agency must consider and respond to the comments.⁷

Notice and comment rulemaking evokes the spirit of democracy and civic republicanism, acting as a mechanism for adding legitimacy to governmental regulation due to the transparency of the agency action and the involvement of the public as a check before a rule may be promulgated.⁸

III. COMMENTS OPPOSING PROJECT DUE TO FEDERAL VIOLATIONS

A. DoD Withholds Information, Deprives the Public the Opportunity to Provide Meaningful Public Comments, and Fails To Comply With Federal Procedural Requirements

The 2011 Programmatic Agreement provides that “DoD will satisfy its Section 106 responsibilities for the Undertaking. . . in carrying out the Undertaking in accordance with the procedures defined by this PA[.]” As such, the 2011 PA governs procedural requirements for Project J-017.

DoD’s failure to provide sufficient information deprives the public from opportunities to make meaningful comments. Section IV.E.2. requires the DoD to “utilize a publicly accessible Cultural Resources Information (CRI) website to [1] make information available to the public and [2] request the public’s input regarding the identification and evaluation of historic properties within

⁴ Donald J. Kochan, *The Commenting Power: Agency Accountability Through Public Participation*, 70 OKLA. L. REV. 601, 602-03 (2018), available: <https://digitalcommons.law.ou.edu/olr/vol70/iss3/2>.

⁵ *Id.* at 603.

⁶ *Id.*

⁷ *Id.* at 605.

⁸ *Id.* at 606.

project-specific APEs for direct and indirect effects.”⁹ Specifically, the CRI website must provide “information and appropriate supporting documentation regarding DoD’s identification and evaluation efforts and findings, in order to provide the public opportunities to comment.”¹⁰

Here, the DoD deprives the public from the opportunity to comment when its CRI website does not provide or fails to provide the information to the public. The scope of DoD identification efforts¹¹ reference several supporting documents that are not available on the CRI website.¹²

Under Section IV.E.2.a., the CRI Website must “include supporting information regarding study areas, the scope of DoD identification efforts, and DoD’s determinations of eligibility[.]”¹³ The following is a list of documents that are referenced in the PA Memo but are not included on the CRI website:

- “Appendices D and E of the 2011 PA;”
- “DoD surveys and evaluations have focused on project-specific APEs;”
- Completed “architectural and archaeological assessments”
- “Original studies of cultural and/or historic resources”¹⁴

Although every other Appendix to the 2011 PA is available on the CRI Website,¹⁵ the two most important supporting documents for this PA Memo happened to be missing: “Appendices D and E of the 2011 PA.” Appendix D of the 2011 PA is the “Summary of Identification and Evaluation Efforts, including information on identified Archaeological Sites[.]”¹⁶ Appendix E is the “List of Projects included in the Undertaking.” Clearly, without Appendix D of the 2011 PA, the public does not have a opportunity review and thus comment on the PA Memo’s “identification and evaluation of historic properties[.]”

To address the lack of documents on the CRI Website, I reached out via email to several CRI Website staff on the lack of access to Appendices D and E.¹⁷ On July 7, 2020, I requested assistance from CRI Website site staff regarding the unavailability of Appendices D and E.¹⁸ On July 7-9, 2020, I expressed my concerns to CRI Website staff about not having adequate time to review the documents.¹⁹ After following up on my request for assistance, I received “Ticket

⁹ 2011 PA at 9.

¹⁰ *Id.*

¹¹ *Id.*

¹² PA Memo at 2.

¹³ 2011 PA at 9.

¹⁴ *Id.* at 15.

¹⁵ See the Cultural Resources Information website:

https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/cultural_resources/guam-and-cnmi-programmatic-agreement.html;

See CRI Website link that is missing Appendices D and E

https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/cultural_resources/guam-and-cnmi-programmatic-agreement.html

¹⁶ 2011 PA at 62.

¹⁷ Attachment A is a true and correct copy of my email correspondences with CRI Website staff, throughout July 7, 2020 through July 10, 2020.

¹⁸ Attachment A at 1.

¹⁹ *Id.* at 4.

number 1365485” and my issue was submitted to administrators.²⁰ After several follow ups, including emailing with the CRI Website webmaster, I never received Appendices D and E. On July 15, 2020, 5:05AM PST—the day the comments for this proposal is due—I received an email from CRI Staff that provided me attachments relating to Appendix D and Appendix E.

I appreciate the helpfulness of the CRI Website staff. However, the CRI Website still lacks the information as is required under the 2011 PA. I did not have an adequate or fair amount of time to review the documents forwarded to me this morning. Thus, DoD violates Section 106 procedural requirements by violating Section IV.2.a of the 2011 PA.

This lack of transparency goes against the spirit of democracy and the purpose of the public comment process. I further request all of the supporting documents referenced in the PA Memo be available on the CRI Website. As noted above, and in addition to the remaining missing references, the PA Memo’s references that are found on page 3 and 4 are not available on the CRI Website. To secure the strong public interest of upholding democratic principles, I request that DoD re-initiate the public comment period for Project J-017 and provide the public adequate time and information.

The lack of information triggers further regulatory requirements:

- 1. CRI Website does not include sufficient information.** Under 36 CFR §800.2(d)(2), the agency official must provide “information about an undertaking and its effects on historic properties[.]” As noted above, the CRI website fails to provide sufficient information to support the Determination and Identification provided by the DoD.
- 2. DoD fails to meet “Documentation standards” per 36 CFR § 800.11(a) Adequacy of documentation.** “The agency official shall ensure that a determination, finding, or agreement under the procedures in this subpart is supported by sufficient documentation to enable any reviewing parties to understand its basis.” (emphasis added) Here, the determination is not supported by sufficient documentation. The public cannot understand the basis of the determination until all supporting documents are on the CRI Website.
- 3. Inadequate “Documentation standards” under 36 CFR § 800.11(d) Finding of no historic properties affected.** “Documentation shall include: (1) A description of the undertaking, specifying the Federal involvement, and its area of potential effects, including photographs, maps, drawings, as necessary; (2) A description of the steps taken to identify historic properties, including, as appropriate, efforts to seek information pursuant to § 800.4(b); and (3) The basis for determining that no historic properties are present or affected[.]” (emphasis added). The 2011 PA Stipulation IV.E.2. provides that “The website will provide information and appropriate supporting documentation regarding DoD’s identification and evaluation efforts and findings, in order to provide the public opportunities to comment.” Here, there are no supporting documentation with respect to the research methodology, or the description of the steps taken to identify the significance of the historic properties. It bears repeating that the basis for DoD’s

²⁰ *Id.* at 3.

determination is unsupported by sufficient information, fails to comply with procedural requirements, and is therefore invalid.

B. The Determination of “Will Not Effect” is Arbitrary and Capricious

The PA Memo’s Determination of Effect provides:

“Considering the information presented above, the DoD has determined that the design and construction of this project will not affect historic properties since NRHP eligible sites (GHPI Sites 66-08-2303, 66-08-2305, and 66-08-2307) have been [1] mitigated per requirements under PA Memo #2 for J-001B Utilities and Site Improvements Phase I dated December 9, 2014) (Dixon et al. 2018) and [2] archaeological investigations for areas identified during archaeological monitoring are nearing completion and all archaeological research will be finished prior to the start of J-017 construction.”

PA Memo at 5. This Determination is invalid and does not reflect sound deliberation for at least several reasons.

1. DoD’s approach to deviate from a determination of “adverse effects” violates the Section 106 process.

First, the PA Memo’s determination that the project will “not affect” historic properties is an illegitimate determination with respect to an “adverse effect.” Nearly a decade ago, in 2011, the DoD found that “Project[] J-017 will have [an] *adverse effects* on historic properties.” PA Section V.A.1.b. An adverse effect is different from an “effect[.]” The regulations define “*Effect*” as an “alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register.” 36 CFR § 800.16(i). However, an *adverse effect* has worse impacts on historic properties than a mere “effect.”

Rather, a project’s adverse effects would alter the historic property in a manner that would *diminish the integrity* of the property's location, design, setting, materials, workmanship, feeling, or association.” 36 CFR § 800.5(1) (emphasis added). Several examples of adverse effects are provided under 36 CFR § 800.5(a)(2):

- (i) Physical destruction of or damage;
- (ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary’s Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines;
- (iii) Removal of the property from its historic location;
- (iv) Change of the character of the property’s use or of physical features within the property's setting that contribute to its historic significance;

(v) Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features[.]

Without any reasoned explanation or justification, DoD avoids making a determination of adverse effects with respect to the new information that was discovered on the site. Numerous artifacts, human remains, ceramics, and shells were discovered on Finegayan, and DoD merely makes a conclusion based on the “effect” its project will have on these historical properties. DoD’s decision to deviate from determining whether the Project will have “adverse effects” is not supported by the record.

Further, DoD’s inconsistent use of terminology in its finding does not comport with its mitigation efforts, which are only used in anticipation of an adverse impact. Accordingly, DoD must re-evaluate its findings and make an appropriate determination that the project will either have or will not “have adverse effects on historic properties[.]” *See* Section V.A.1.b. DoD’s determination is invalid and such an approach to deviate violates the Section 106 process.

2. DoD fails to make a reasonable and good faith effort to mitigate adverse effects on CHamoru land, and fails to take into account historic properties.

Second, DoD fails to make a reasonable and good faith effort to avoid or mitigate any adverse effects. Under NHPA, DoD must make a reasonable and good faith effort to identify historic properties, 36 C.F.R. § 800.4(b); determine whether identified properties are eligible for listing on the National Register based on criteria in 36 C.F.R. § 60.4; assess the effects of the undertaking on any eligible historic properties found, 36 C.F.R. §§ 800.4(c), 800.5, 800.9(a); determine whether the effect will be adverse, 36 C.F.R. §§ 800.5(c), 800.9(b); and avoid or mitigate any adverse effects, 36 C.F.R. §§ 800.8(e), 800.9(c).

The 2011 PA offers several options to mitigate an otherwise adverse effect so that it is “considered as being not adverse.” *See* Stipulation VI. These include the following: “Data recovery excavations” will be considered standard mitigation for any historic property that is strictly archaeological in nature and will be adversely impacted. 2011 PA Stipulation VI.A.1.b. (emphasis added).

Here, the archaeological investigation and monitoring is incomplete. *See* PA Memo at 5 (“archaeological investigations for areas identified during archaeological monitoring are nearing completion and all archaeological research will be finished prior to the start of J-017 construction”). It is unclear how the DoD can make a determination that the project “will not affect historic properties” when the archaeological investigations, and archaeological research are incomplete. PA Memo at 5. The PA Memo vaguely states that at some time “prior to the start of J-017 construction,” all research will be complete. The determination is unsupported and thus invalid. If DoD moves forward with Project J-017 without complete information, DoD fails to “take into account” such historic properties.

Incomplete research and data does not and cannot support a determination of effect--It only supports a showing that the DoD makes determinations with insufficient information. Numerous human remains were found on Finegayan, ceramics, and ancient Chamorro artifacts, faunal and

human bone. This is just a fraction of the history that is on Finegayan. It goes against the purpose the Section 106 process to just assume that the mitigation to any future discoveries will preserve the history. DoD has a responsibility to the Chamorro people, as it allegedly “recognizes the long and unique history of Chamorros on Guam and the importance of protecting and preserving the record of that history under Federal law[.]”²¹ Until DoD completes the archaeology research and investigations of Finegayan, DoD fails to protect the history of the Chamorro and is a complete disregard of federal law. All archaeological investigations and research must be completed prior to making a determination. And all documentation should be provided to the public.

3. DoD’s PA Memo Contains Incomplete Data and Is Invalid.

Third, this lack of complete data further violates the information that must be contained in the PA Memo, the results of cultural resources review. The 2011 PA provides:

“To facilitate public involvement in the annual review process, DoD will post to the *CRI website* the summary memoranda (PA Memos) *for public inspection for the projects proposed* for that fiscal year. Consistent with the measures defined below, DoD will provide PA Memos to the public for comment prior to DoD authorization of ground-disturbing activities or other actions with the potential to adversely affect historic properties. . . .

a. PA Memos will contain concise summaries of project information with a map showing the project footprint and results of cultural resources review, subject to the limitations defined under Stipulation IV.E.2.b.

Section V.B.1. (emphasis added).

The PA memo’s “Results of cultural resources review” are incomplete because archaeological investigations are incomplete. “[A]dditional archaeological investigations are currently being conducted in consultation with the Guam SHPO to document and evaluate discoveries of artifact clusters and soil stains discovered during archaeological monitoring of J-001B.” PA Memo at 5. There is no information as to whether or not the “investigations, and any post-evaluation work” was completed. PA Memo at 5. Accordingly, DoD’s determination is arbitrary and capricious and must re-evaluate, re-characterize, and re-identify the historical significance of the properties consistent with complete archaeological reports and data.

IV. CONCLUSION

For the reasons stated above, I urge DoD to not proceed with the current proposal of Project J-017 for failing to meet Section 106 requirements, the regulations, and the 2011 PA. Accordingly, I respectfully request that the PA Memo’s findings and determinations be revised by the DoD in compliance with Section 106; that DoD re-evaluate its mitigation efforts, re-characterize the site, re-identify the historical significance, and complete archaeological research; and provide all supporting documents relating to its findings and determination on the CRI Website.

²¹ 2011 PA at 2.

Respectfully submitted,

/s/ Cheerful Catunao
CHEERFUL CATUNAO

Attachment: Appendix A “CC String Email - Help with Appendix D and E; Guam and CNMI Programmatic Agreement”

From:
Sent: Wednesday, July 8, 2020 7:51 AM
To: CRIWebComment;

Subject: [Non-DoD Source] Project J-017

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

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I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete

From:
Sent: Thursday, July 2, 2020 7:36 AM
To:
Subject: FW: [Non-DoD Source] Project J-017

From:
Sent: Wednesday, June 24, 2020 11:52 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Project J-017

I am writing to you today as an indigenous person of the island of Guam to demand these measures for the proposed Project J-017 be heavily taken into consideration:

- Assemblance of local experts and advisers on military statements regarding the buildup
- Providing status report on the local government's oversight of the buildup, including site visits and mitigation efforts
- Establishing a plan for increased local oversight of the Northern Guam Lens Aquifer
- Assessing future Department of Defense plans on the island
- Preventing further disruption of of ancient sites and preserving historical sites in place
- Requesting detailed maps from the military of historic sites on base
- Assessing via local efforts the buildup's economic impacts on the island
- Conducting village-wide town halls on the issue

information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Georgette Chaco

From:
To: in_o_mitt-eis.com CRIWe Comment
Subject: [Non-DoD Source] 2020 MITT Final Supplemental EIS EIS
Date: Monday, July 20, 2020 7:11 : PM

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

☐ Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

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Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Natalia G. Chargualaf

Military Relocation PA Memo Comment Form

2020

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 outlined in red are required to be completed in order for a comment to be posted.

Privacy Act Statement

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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-017 Area Distribution Nodes and Site Telecom Cabling Project - Design and Construction, Navel Base Guam Telecommunications Site (NBGTS) Guam

SUBJECT: J-017 Area Distribution Nodes and Site Telecom Cabling Project - Design and Construction, PA Memo # 1

Date: 7/3/2020

Name: Charlene Connelley

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: There is medicines found only in these sites. I disagree and refuse to allow the build up happen w/o my voice being heard. There is sacred burial sites and so much history for the GtTaman people to learn from these sites. I do not support the destruction of these sites.

Comment # 31

From:
To: FW: [Non-DoD Source] Please Stop Project J-017 Thursday,
Subject: July 2, 2020 7:31: AM
Date:

-----Original Message-----

From:
Sent: Friday, June 19, 2020 5:28 AM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Please Stop Project J-017

To whom it may concern,

It has been brought to my attention that a military base is in the process of development in Northern Guam. Additionally, it has been brought to my attention that Project J-017 will destroy the lands of ancient, indigenous sites of Northern Guam that are sacred to individuals belonging to or having ancestral ties to these areas. The project you plan on imposing is going to demolish these sites, thereby removing an essential and important aspect of these people's history. The land of indigenous people in Guam has been imposed upon multiple times, chipping away at the little they have left. Please don't further scar and taint indigenous people's history. If this project is essential, despite having several bases on the tiny island of Guam, please consider moving it to a different site that won't disrupt the sacred land that they have left.

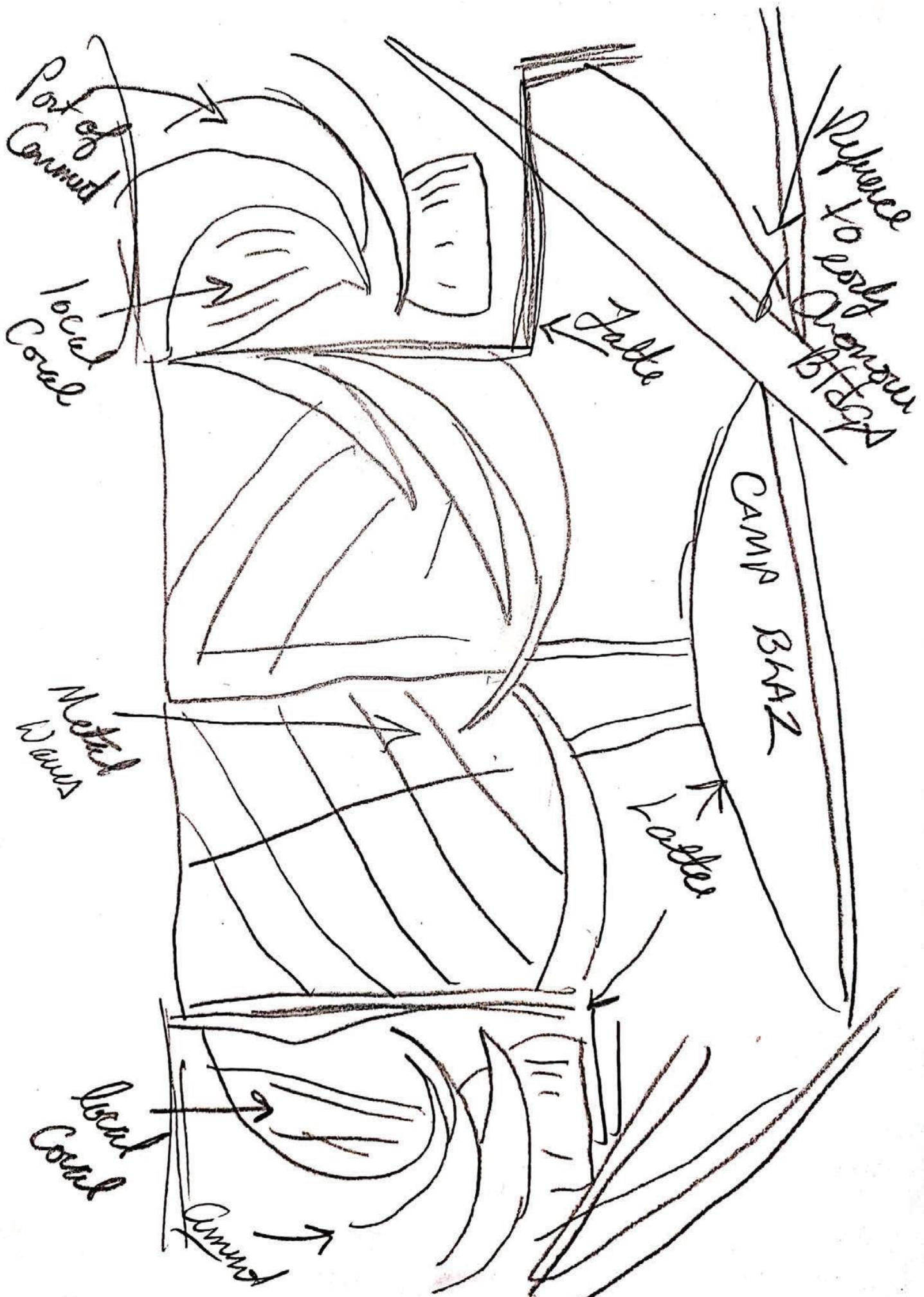
Thank you for your time,
Lauren Cook

Comment # 32

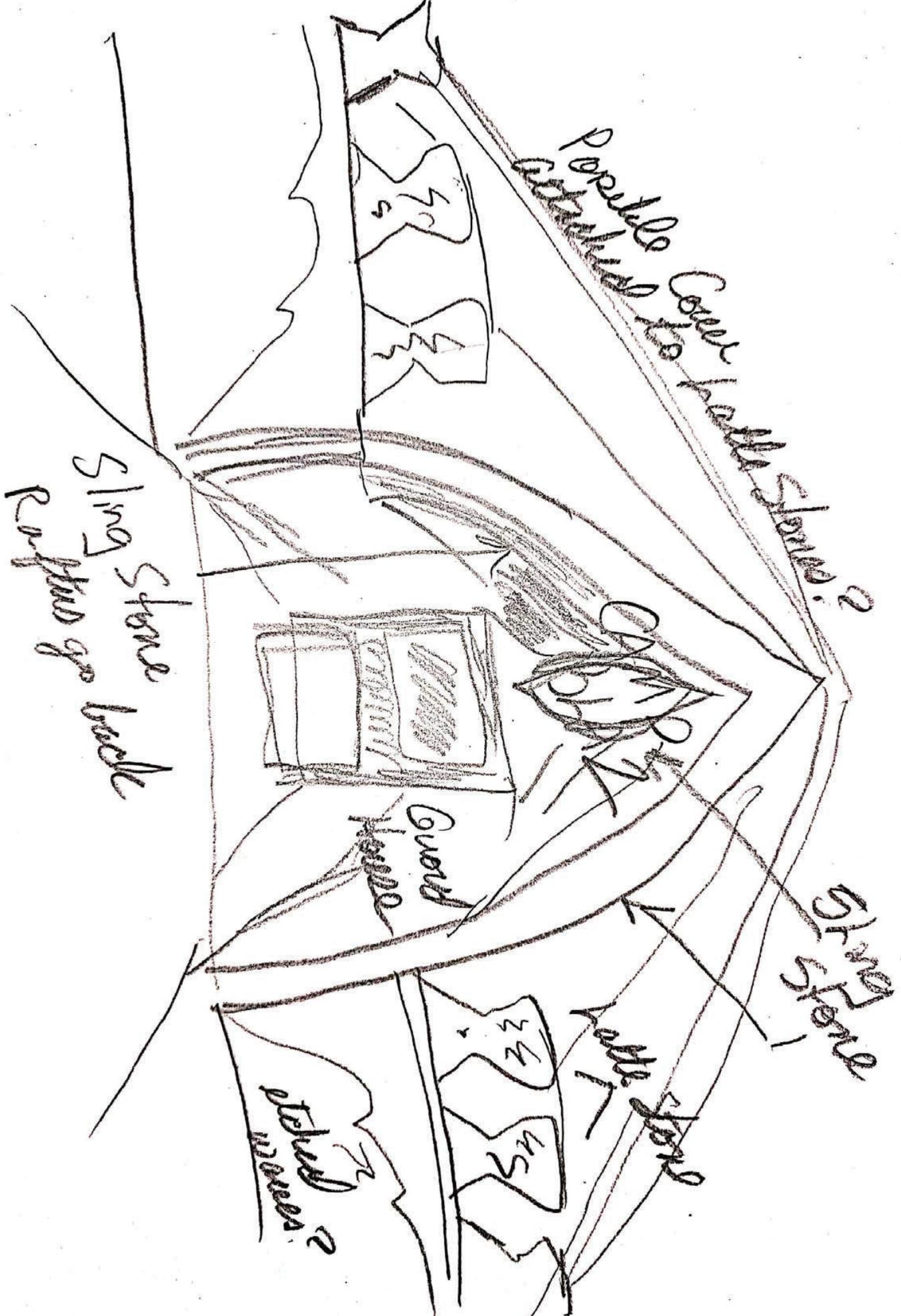
From:
Sent: Friday, May 8, 2020 6:51 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] CamScanner 05-09-2020 14.39.01.pdf

Probably not the input you wanted, but the article published in the PDN wasn't clear. Here are my suggestions for the gate. Keep in mind I'm not local so...probably need some Chamoru feedback.

Scanned with CamScanner







From:
Sent: Friday, July 10, 2020 7:02 AM
To: CRIWebComment
Subject: [Non-DoD Source] Preserve Our Land

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Angelina Cossari

From:
Sent: Wednesday, July 15, 2020 10:23 PM
To: CRIWebComment;

Subject: [Non-DoD Source] Project J-017 Comments

Håfa adai,

I am a concerned citizen deeply disturbed by the clearing of three CHamoru cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the destruction and desecration of these sites, which hold great significance to my CHamoru culture and identity. I am furious that the period for public comments comes **after** these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at these sites for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan and the CHamoru people. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our burial grounds and our cultural resources is a part of our identity lost that we will never get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings and removal of CHamoru cultural sites, ancestral human remains, funerary objects and artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in situ. The people of Guam do not need another military base on our 212 square mile homeland.

I am extremely dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and their sacred funerary objects and the remnants of our history. Where is

the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge Guam's SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I am vehemently opposed to the clearing of CHamoru cultural sites and properties on Guam. Due to the lack of detail and transparency surrounding MILITARY buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in situ.

Sin más,

/S/HOPE A. CRISTOBAL
TAMUNING, GUAM

Comment # 35

From: FW: [Non-DoD
To: Source]
Subject: Thursday, July 2, 2020 7:2 :2 AM
Date:

From: A Cruz
Sent: Wednesday, June 10, 2020 2:08 AM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source]

This island span is only 30 miles long. Why does the military feel the need to build yet another base, making it in complete 3 bases? Our island is tiny..

From:
Sent: Wednesday, July 15, 2020 4:26 AM
To: CRIWebComment
Subject: [Non-DoD Source] Prutehi Mariãnas: Project J-017

Hafa Adai,

I am a concerned daughter of the Mariãnas deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am outraged by the clearing of these sites which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for a public review prevented meaningful public information to be disseminated and for community involvement, comments, and critique to be genuinely centered.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guãhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans.

Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects:

1. Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community;
2. Assemble local experts and advisers on military statements regarding the buildup;

3. Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts;
4. Establish a plan for increased local oversight of the Northern Guam Lens Aquifer;
5. Assess future Department of Defense plans on island;
6. Prevent further disruption of ancient sites and preserving historical sites in place;
7. Request detailed maps from the military of historic sites on base;
8. Assess via local efforts the buildup's economic impacts to the island;
9. Conduct village-wide town halls on the issue.

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,
Casierra Cruz

--

Casierra Cruz, MPH
Research Coordinator, Partnerships for Native Health Initiative for Research and Education to Advance Community Health (IREACH) Community-Oriented Public Health Practice | University of Washington

From:
Sent: Thursday, July 2, 2020 7:40 AM
To:
Subject: FW: [Non-DoD Source] Project -017

From:
Sent: Monday, June 29, 2020 3:41 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Project -017

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity public review prevented meaningful public information, involvement, comments, and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

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Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding build project in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

J. Cruz

Military Relocation PA Memo Comment Form

2020

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 outlined in red are required to be completed in order for a comment to be posted.

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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: I-017 Area Distribution Nodes and Site Telecom Cabling Project - Design and Construction, Navel Base Guam Telecommunications Site (NBGTS) Guam

SUBJECT: I-017 Area Distribution Nodes and Site Telecom Cabling Project - Design and Construction, PA Memo # 1

Date: 07/03/2020

Name: Ronnam Gev2

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: Please listen. That's all we're asking.

Military Relocation PA Memo Comment Form

2020

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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: I-017 Area Distribution Nodes and Site Telecom Cabling Project - Design and Construction, Naval Base Guam Telecommunications Site (NBGTS) Guam

SUBJECT: I-017 Area Distribution Nodes and Site Telecom Cabling Project - Design and Construction, PA Memo # 1

Date: 7/3/2020

Name: Starlet Cruz

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:

As a youth of Guahan, a future voter, and an individual next in line to inherit this land, I will do everything in my power to advocate against the U.S military's destruction in our archipelago. These sites were eligible for the Registered National Historic Places and we have noticed that you have ignored this fact.

COMMENTS:

The people of Guam and the rest of the Marianas do not deserve this treatment.

Military Relocation PA Memo Comment Form

2020

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

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Code EV23, NAVFAC Pacific
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JBPHH, Hawaii 96860-3134

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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-017 Area Distribution Nodes and Site Telecom Cabling Project - Design and Construction, Navel Base Guam Telecommunications Site (NBGTS) Guam

SUBJECT: J-017 Area Distribution Nodes and Site Telecom Cabling Project - Design and Construction, PA Memo # 1

Date: 7/15/2020

Name: Else Demeulenaere

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: I would like to express my concerns regarding the construction of the Area Distribution Node and Site Telecom Cabling Project at the North Finagayan. _____

Military Relocation PA Memo Comment Form

2020

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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-017 Area Distribution Nodes and Site Telecom Cabling Project - Design and Construction, Navel Base Guam Telecommunications Site (NBGTS) Guam

SUBJECT: J-017 Area Distribution Nodes and Site Telecom Cabling Project - Design and Construction, PA Memo # 1

Date: _____

Name: Monika DeOro

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: Project J-017 needs more field research
All projects should require a Chamoru cultural
field liason & community member that oversees
action, similar to programs in Hawaii with native
Hawaiians at the Marine base in Oahu.
There is much to be stated that highlights the

Military Relocation PA Memo Comment Form

2020

COMMENTS:

Navy's inadequate response to the preservation of Chamorro cultural heritage.

Comment # 42

July 15, 2020

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

PROJECT: J-017 Area Distribution Nodes and Site Telecom Cabling Project - Design and Construction, Naval Base Guam Telecommunications Site (NBGTS) Guam

SUBJECT: J-017 Area Distribution Nodes and Site Telecom Cabling Project - Design and Construction, PA Memo # 1

Håfa adai,

I am writing as a private citizen and local resident of Guåhan. I was born and raised on Guåhan and it is home to me, my family, and my ancestors.

I strongly oppose Project J-017 that has already begun surveying and construction of area distribution nodes and telecom cabling on the Magua' ancient village latte site in NCTS Finegayan area of Northern Guåhan. It is unconscionable that sacred sites, cultural relics, and ancestral burials have been desecrated with little regard for the sanctity of CHamoru beliefs, culture, practices, and land rights.

The fact that the period for public comments comes after these cultural sites have already been cleared flies in the face of a basic tenet of indigenous rights, i.e., the right to free, prior, and informed consent. Free, prior, and informed consent must be obtained before the approval of any project affecting indigenous lands or resources (see Article 32, section 2 of the United Nations Declaration on the Rights of Indigenous People).

This process that DOD has used to gather community input and to engage SHPO is extremely problematic. There has been little transparency in the process, lack of detailed information, and minimal communication with the local community. The PA memo #1 indicates that *the project will not affect historic properties* since NRHP eligible sites have been mitigated per requirements under PA Memo #2. This is erroneous. These sites and the land were a living testament to the history of the CHamoru people. They have been permanently destroyed in spirit and essence.

It goes without saying that mitigation through "data recovery" is not an appropriate measure. Even then, the data recovery process is unclear. Where are the artifacts and remains being held? Who decides what is kept and what is discarded? How do CHamoru access these memories, these artifacts, and these remains that belong to us?

I strongly object to any future clearings of our cultural sites and artifacts.

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Sincerely,


Tressa P. Diaz

From:
Sent: Wednesday, July 8, 2020 11:38 AM
To: CRIWebComment
Subject: [Non-DoD Source] Our Island is Sacred!

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Dazdo Duenas

From:
Sent: Thursday, July 2, 2020 7:34 AM
To:
Subject: FW: [Non-DoD Source] Comments on proposed Project J-017

From:
Sent: Wednesday, June 24, 2020 11:19 AM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Comments on proposed Project J-017

Good afternoon,

I am a California resident of indigenous Chamorro heritage. I am of full Chamorro descent, completing my Bachelor's in Anthropology and on my way to obtaining my Master's in Micronesian Studies. I am currently an intern at the California Energy Commission under the Cultural Resources Unit.

Part of my work in the Unit is to conduct fieldwork and to mitigate cultural resources in designated areas of California. Based on my background, knowledge, experience, and heritage, I am emailing you today to submit my comments and thoughts on the recent proposed Project J-017.

Based on the lack of protection of vital cultural resources on the island of Guam, it is not only critical for the culture of the indigenous peoples'; but also to anthropology and social sciences itself, for these sites to be ultimately protected. These sacred sites are eligible for the National Register of Historic Places, meaning that these sites are over 50 years old and hold historical and cultural relevance to not only indigenous history but America's history as well.

They are specific to the Marianas and can be found nowhere else in the world, there are no other artifacts of these kinds that can be found anywhere else; therefore these sites need to be protected. Not only that, these ancient artifacts and sites of the indigenous peoples of the island have systematically been overlooked. As an indigenous from the island, it is important for us to treasure, venerate, and preserve these sites to teach and show to future generations.

I am writing to you today as an indigenous person from the island of Guam, a social scientist, and an American citizen to demand these measures for the proposed Project J-017 be taken and heavily considered:

- Assemblance of local experts and advisers on military statements regarding the buildup
- Providing status reports on the local government's oversight of the buildup, including site visits and mitigation efforts
- Establishing a plan for increased local oversight of the Northern Guam Lens Aquifer
- Assessing future Department of Defense plans on the island
- Preventing further disruption of ancient sites and preserving historical sites in place
- Requesting detailed maps from the military of historic sites on base
- Assessing via local efforts the buildup's economic impacts to the island
- Conducting village-wide town halls on such issues.

Thank you for your time and consideration.

Si Yu'os Ma'ase,

Vinessa Dueñas

Comment # 45

From: —
To: FW: [Non-DoD Source] PR JECT J-017
Subject: Thursday, July 2, 2020 7:30:1 AM
Date:

From: Leiland
Sent: Thursday, June 18, 2020 1:07 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] PROJECT J-017

Hafa Adai,

I am reaching out as a citizen of Guam and concerned member of the community. I oppose Project J-017 and the further desecration of indigenous land. To our knowledge, efforts toward this project have already resulted in the destruction of three historic sites with pieces of ancient Chamorro history that were eligible for the national register of historic places.

In a time of modernization and industrial build-up, when is it enough? Perhaps this may not be a matter of importance to those in charge of this or similar projects, but it is essential to the spirit of Guahan and her people to preserve what little of our culture we have left.

I urge those who may listen, do not stand on the wrong side of history. Do not be complacent to the cultural genocide of an indigenous people in a society where this has been normalized. Instead of fighting us, hear us, and stand on the side of change.

-Leiland Eclavea

Comment # 46

From:
To: FW: [Non-DoD Source] Project J-017
Subject: Thursday, July 2, 2020 7:37: AM
Date:

From: layana
Sent: Friday, June 26, 2020 5:33 AM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Project J-017

Hello,

As an American citizen, I stand in direct opposition to this plan and program. Native lands deserve to be protected at all cost. This land is sacred and we have a duty to preserve it. The citizens in Guam deserve to have their land protected and not militarized.

layana

Military Relocation PA Memo Comment Form

2020

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

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PROJECT: J-017 Area Distribution Nodes and Site Telecom Cabling Project - Design and Construction, Navel Base Guam Telecommunications Site (NBGTS) Guam

SUBJECT: J-017 Area Distribution Nodes and Site Telecom Cabling Project - Design and Construction, PA Memo # 1

Date: 07/05/2020

Name: Deborah Ellen

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:

Guam is home to the CHamoru people. The U.S. military is a long-time guest – but this is not the U.S. Military property. The Indigenous people of Guam should be the ones to make decisions regarding what can be done, where, and by whom with their island. This is backed by the Sustainable Development Goals and Earth Charter which is the foundation of the SDGs – which one would hope that the U.S. Military/Government would embrace. SDG 14 states “Conserve and sustainably use the oceans, seas and marine resources for sustainable development”, Being a very small island, anything that is done on the island impacts both fresh water and marine resources such as through potential contamination

potential run-off and/or contamination. SDG 15 states “Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss”. Clearing land of its natural growth – especially endangered species – is contrary to SDG 15. Perhaps more importantly, this clearing of land/resources and ancestral/cultural artifacts runs counter to the principles of the Earth Charter:

Pillar 1: Respect and Care for the Community of Life –

Principle 2.a: Accept that with the right to own, manage, and use natural resources come **the duty to prevent environmental harm and to protect the rights of people.**

Pillar 2: Ecological Integrity

Principle 5.a: Adopt at all levels sustainable development plans and regulations that make environmental conservation and rehabilitation integral to all development activities.

Principle 5.b: Establish and safeguard viable nature and biosphere reserves, including wild lands and marine areas, to protect Earth’s life support systems, maintain biodiversity, and preserve our natural heritage.

Principle 5.c: Promote the recovery of endangered species and ecosystems.

Principle 5.e: Manage the use of renewable resources such as water, soil, forest products, and marine life in ways that do not exceed rates of regeneration and that protect the health of ecosystems.

Principle 6.a: Take action to avoid the possibility of serious or irreversible environmental harm even when scientific knowledge is incomplete or inconclusive.

Principle 6.b: Place the burden of proof on those who argue that a proposed activity will not cause significant harm, and make the responsible parties liable for environmental harm.

Principle 6.c: Ensure that decision making addresses the cumulative, long-term, indirect, long distance, and global consequences of human activities.

Principle 6.e: Avoid military activities damaging to the environment.

Pillar 3: Social and Economic Justice

Principle 12.b: Affirm the right of Indigenous peoples to their spirituality, knowledge, **lands and resources** and to their related practice of sustainable livelihoods.

Principle 12.d: **Protect and restore outstanding places of cultural and spiritual significance.**

In considering the above-noted principles set forth by the United Nations and adopted by many nations and communities around the globe, I offer several recommendations:

- 1) Establish a local committee to student the impacts and the necessity of the live-fire training range complex and report all findings to community members for further conversations/recommendations.
- 2) Establish a plan for increased oversight of the Northern Guam Lens Aquifer
- 3) Enable local experts and advisers to assess future DoD plans on Guam – and provide such information to community members for their input.
- 4) Halt all disruption of ancient sites. (period!)
- 5) Collaborate with local experts, advisors, and community members on preserving ALL historical sites.
- 6) Conduct focus groups and village-wide conversations on these issues as well as future decisions.

If the military continues to carry out activities which affect Guam’s resources and historical and spiritual places of significance, this would be deemed as provocative and inappropriate as Guam does NOT belong to the U. S. Military or government. This is the ancestral home of the CHamoru people. Any and all decisions related to the island and how it is developed or altered should be their decision.

Respectfully,
Deborah Ellen, Ed.D.

From:
Sent: Thursday, July 16, 2020 8:24 AM
To: CRIWebComment;

Subject: [Non-DoD Source] Project J-017

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete

information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

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Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Jasmine Flores

Sent from my iPhone

From:
Sent: Thursday, July 16, 2020 12:22 AM
To: CRIWebComment

Subject: [Non-DoD Source] Public Comment - Project J-017

Public Comment: Project J-017

Buenas yan Håfa Adai,

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Senseramente,

Monaeka Flores

Link to PA MEMO for Project: <http://go.usa.gov/kZWG>

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Senseramente,

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Military Relocation PA Memo Comment Form

2020

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If submitting via postal mail, send to:

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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 outlined 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: I-017 Area Distribution Nodes and Site Telecom Cabling Project - Design and Construction, Navel Base Guam Telecommunications Site (NBGTS) Guam

SUBJECT: I-017 Area Distribution Nodes and Site Telecom Cabling Project - Design and Construction, PA Memo # 1

Date: 07/13/2020

Name: Nolan G.T. Flores

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: The military buildup will have irreversible ^{destructive} effects on not just Guam's land and environment, but the culture and history of the Chamorro people. The military has continually ignored ~~any calls for~~ the demands of the people of Guam.

Comment # 51

From:
To: FW: [Non-DoD Source] Lite yan Ritidian area
Subject: Thursday, July 2, 2020 7:32:21 AM
Date:

From:

Sent: Saturday, June 20, 2020 1:17 AM

To: CRIWebComment <criwebcomment@navy.mil>

Subject: [Non-DoD Source] Litekyan/Ritidian area

Everyone has a job to do, your military have already taken more than enough land from the Chamorro people since you liberated us from WW2. Is it necessary to also close off Ritidian to us ? To use as your training grounds? That will probably not be in use in the next 20 years. Or will it? Of all places to occupy you chose our SACRED LANDS our ancestors spirits still reside. We don't know what plans you and our acting governor Lou Leon Guerrero have but please do not take Litekyan/Ritidian away. We shouldn't have to be in this situation.

- Privilege is saving confederacy statues because they're "historic" but bulldozing through ancient sacred sites and artifacts for.

From:
Sent: Wednesday, July 15, 2020 11:17 AM
To: CRIWebComment
Subject: [Non-DoD Source] Project J-017 Comments

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance for the island. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

I will continue to publish academic articles which address the violations due to expanding militarization.

Dr Sylvia Frain

From:
Sent: Thursday, July 16, 2020 11:35 AM
To: CRIWebComment;

Subject: [Non-DoD Source] Conduct village-wide town halls on the issue

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

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Senseramente,

Link to PA MEMO for Project: <http://go.usa.gov/kZWG>

Comment # 54

From:
To: [CRIWe Comment](#)
Subject: [Non-DoD Source] uam
Date: Thursday, July 1 , 2020 7:2 :10 AM

I am emailing to submit a comment on the proposed Marine base on Guam. I do not support the further militarization of Guam, nor the military occupation and theft of land from the people of Guam. This base is likely to have a negative effect on the people and land of Guam, through environmental destruction.

Natalie Franz
Washington State

From:
Sent: Thursday, July 2, 2020 7:30 AM
To:
Subject: FW: [Non-DoD Source] Fw: Comments on the proposed gates planned for Marine Corps Base Camp Blas

From:
Sent: Saturday, June 13, 2020 9:11 PM
To: CRIWebComment <criwebcomment@navy.mil>
Cc: governor@guam.gov; ltgovernor@guam.gov
Subject: [Non-DoD Source] Fw: Comments on the proposed gates planned for Marine Corps Base Camp Blas

Subject: Comments on the proposed gates planned for Marine Corps Base Camp Blas

Gentlemen:

The proposed gates for the Marine Corps Base Camp Blas should properly account for a minimal or no impact on the abutting public roadways for all traffic conditions the camp will generate. As in any major military installations, like the Naval Base Guam and Andersen Air Force Base, they generate a tremendous amount of morning and afternoon rush hours traffic. Generally traffic queue spill over on the public roadway creating delays on non-base thru traffic. During occasional security ID check conducted by the Navy it creates long traffic queues resulting from the delayed gate entrance in checking ID's. It was observed Naval Base ID checks is no longer occasional it has become often and traffic can as be as long as to the intersection of Polaris Point. With the current Navy construction on Route 1 towards the Navy that reduced the 2-lane southbound road into single lane traffic is hardly moving when the Navy conducts ID security check. Lately the construction area seems to have very little activities. Contractor seems to be taking their own sweet time to finish the construction. The general practice in the states when a construction on public roadways will have a major impact on the travelling public an incentive/disincentive clause is included in the contract to force the contractor to minimize the impact to the travelling public and shorten construction time. When the Navy was planning to relocate the naval base gate to its current location Government of Guam pointed out the long traffic queue conditions stated above will occur. The Navy has chosen to ignore the comments and proceeded with the relocation of the gate without any provisions to alleviate the gate's impact on the public roadways.

I would like to submit the following comments to be considered and/or included in the plans and/or agreement for the Camp Blas Gate(s) to minimize impact to public traffic:

1. A comprehensive traffic study should be conducted to alleviate the traffic queue to be generated by the camp during strict security ID check. Any traffic queue should not obstruct any lane(s) on Route 3. Additional lanes should be constructed to accommodate security traffic queue or provisions to temporarily move the gate inside the camp so that all queues occur inside the camp instead of queues occurring on Route 3 and limit impact to public traffic.
2. In the agreement for the gate it should include provisions that any camp related construction activities outside of the camp should include an incentive/disincentive clauses and possibly require contractor a 24/7 operation to minimize construction time, minimize impact to public traffic. The current slow construction outside of the Navy is negatively impacting public traffic and an eyesore and nuisance especially to our tourist industry, the only industry of the island.

3. If there are traffic signals to be installed on public roadways necessary for the camp entrance road the future operation and maintenance should be turned over to the Government of Guam for control to always favor public traffic movement however all cost including future maintenance and operations and power cost for such traffic signals should be borne by the camp. The government of Guam should not be burdened for the cost of such traffic signal(s) for the sole convenience of the camp.
4. All military vehicular convoys outside of the camp should always be conducted during non-rush hour traffic and always coordinated with the Government of Guam to minimize public traffic impact.
5. All traffic signage should properly conform to the standard highway signs or MUTCD and standard highway gothic. The current Navy destination sign contains about 24 destinations; destination signs should be limited to 3 lines as the average person can only read up to 3 lines of information while driving at the same time. Most likely the navy destination sign serves no purpose.

Marc A. Gagarin

Comment # 56

From:

To:

Subject: FW: [Non-DoD Source] Comments on the proposed gates planned for Marine Corps Base Camp Blas

Date: Thursday, July 2, 2020 7:2 :0 AM

-----Original Message-----

From:

Sent: Wednesday, May 27, 2020 1:57 PM

To: CRIWebComment <criwebcomment@navy.mil>

Subject: [Non-DoD Source] Comments on the proposed gates planned for Marine Corps Base Camp Blas

The gates for the Marine Corps Base Camp Blas should be properly account for minimal or no effect on the public roadways for all traffic conditions anticipated for the base. Morning rush hour traffic que

Comment # 57

Buenas yan Håfa Adai,

My name is Heather Ann Franquez Garrido and I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am appalled by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites will be destroyed? Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

I request the following:

- Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community
- Assemble local experts and advisers on military statements regarding the buildup

- Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts
- Establish a plan for increased local oversight of the Northern Guam Lens Aquifer
- Assess future Department of Defense plans on island
- Prevent further disruption of ancient sites and preserving historical sites in place
- Request detailed maps from the military of historic sites on base
- Assess via local efforts the buildup's economic impacts to the island
- Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

I urge you to do more. Do more than what you've already done. Do more for us as the future generation of guåhan.

Senseramente,

A handwritten signature in black ink, appearing to read 'hg', written in a cursive style.

Heather Garrido

Buenas yan Håfa Adai,

I am a concerned citizen troubled by the clearing of three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to Guåhan's culture and the identity of the Chamorro people. Moreover, the fact that the period for public comments comes after these highly significant sites have already been cleared is yet another injustice. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

Losing three cultural sites is a grave loss for the people of Guåhan. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back. As part of the Filipino diaspora, Guåhan is the only home I've ever known. I didn't have the privilege and honor of exploring my indigenous roots in the Philippines or growing up with a strong connection to my ancestors. I moved to California when I turned 18 and felt what it meant to be a minority for the first time. I started seeking out other Asian and Pacific Islanders, and eventually sought out books, documentaries, anything I could get my hands on that helped me learn about the Philippines and Guåhan. The more I learned, the more I realized how little I knew about either places or the people who call it home. There are some things that seem inconsequential until they become inaccessible – for me, that was my Filipina identity, especially in relation to Guåhan. Being able to learn about my people's history, culture, and traditions not only instilled pride in myself and my community, but was made possible by brave folks who fought for the preservation of that culture and identity. Putting a stop to further action at the proposed marine base means Guåhan has the chance to prevent more of the same erasure that's been inflicted on indigenous communities and communities of color for generations.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of ancient burials and the permanent destruction of our land, endangered species, and invaluable resources. I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. I also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects:

- Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community
- Assemble local experts and advisers on military statements regarding the buildup
- Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts
- Establish a plan for increased local oversight of the Northern Guam Lens Aquifer
- Assess future Department of Defense plans on island
- Prevent further disruption of ancient sites and preserving historical sites in place
- Request detailed maps from the military of historic sites on base
- Assess via local efforts the buildup's economic impacts to the island
- Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive.

Senseramente,
Francesca Gatuz

From:
Sent: Thursday, July 2, 2020 7:36 AM
To:
Subject: FW: [Non-DoD Source] Public Comment for Project J-017

From:
Sent: Thursday, June 25, 2020 9:16 AM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Public Comment for Project J-017

Hello,

My name is Rafael Gomes, a USN Veteran who calls Guam home. Listed below are my comments that I want to submit on Project J-017.

- Project J-017 should have local experts and advisers on military statements regarding the military buildup on Guam.
- Status reports need to be provided to Guam's local government; specifically the local government officials responsible for oversight of the military buildup.
- Additionally, a plan for increased local oversight over the Northern Guam Lens Aquifer should be established.
- The overall oversight should include site visits, mitigation efforts, and detailed maps from the military historic sites on Guam's military bases.
- Future Department of Defense plans on islands should be assessed by the Government of Guam and other pertinent local organizations as well.
- Village-wide town halls on these issues/plans/projects need to be conducted more often and at more convenient times for the community to attend and voice their concerns.

The prevention of further disruption of ancient sites and the preservation of historical sites that are set in place is what I hope the mentioned comments can aim to achieve.

Respectfully,
Rafael Gomes
Clinical Account Specialist
Biosense Webster Inc
Johnson & Johnson

Comment # 60

From:
To: FW: [Non-DoD Source] Guam Military Base
Subject: Thursday, July 2, 2020 7:3 : 3 AM
Date:

-----Original Message-----

From:
Sent: Thursday, June 25, 2020 2:11 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Guam Military Base

To whom it may concern,

The indigenous people of Guam have repeatedly requested that a new military base not be built. The proposed location is both culturally and historically significant to residents. Guam already has a significant military buildup and does not need any more.

Comment # 61

From:

To:

[CRIWe Comment](#)

Monday, July , 2020 11: 3: 3 AM

Subject:

Date:

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

☐ Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through “data recovery” is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need

another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

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Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Chloe Gregory

Comment # 62

From:
To: FW: [Non-DoD Source] Project J-017
Subject: Thursday, July 2, 2020 7: 2:1 AM
Date:

From: Royce
Sent: Monday, June 29, 2020 8:05 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Project J-017

Hello,

I am writing in with regards to what is happening in the island of Guam and in the Marianas Islands. I would like to say that how our islands are being treated is quite disgraceful to the people of Guam and to the Chamorro culture.

I urge you to do better for our ancient artifacts and for our cultural heritage sites. I urge you to not build firing ranges on our islands as they can harm birds and wildlife and all fauna and flora. Again, Please do not build firing ranges on our islands please do not use our islands for testing sites as it's harmful and can pollute the surrounding waters of the Marianas Islands. These waters and roots run deep. We know our culture and want to learn more and understand more but we can't do so with all of your aggravated actions to our land without proper respects paid and acknowledged.

The people of Guam have been oppressed and given up the use of their land for far too long. Not only do you take what you want from the islands, the people of Guam don't even get proper civil rights to vote like all Americans should be allowed.

My family has been on the islands since before we can remember and it breaks our hearts to see how our islands are being used and how our people are being used.

Please do better for the Chamorro People. We deserve respect and for our voices to be heard. We are the shield and spear of all the US might yet our concerns are not heard or met. Do better.

Si yu'us maase.

Royce P. Manglona Guerra

From:
Sent: Thursday, July 2, 2020 7:42 AM
To:
Subject: FW: [Non-DoD Source] Preserve Guam Heritage

From:
Sent: Monday, June 29, 2020 6:20 PM
To:
Subject: [Non-DoD Source] Preserve Guam Heritage

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO

Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed “insignificant” through DOD’s colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

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Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Jack, Tamuning

From:
Sent: Thursday, July 16, 2020 4:37 AM
To: CRIWebComment;

Subject: [Non-DoD Source] Preserve Guahan's Cultural Sites

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

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Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

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Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Joe Hernandez

Comment # 65

From:
To: FW: J-017-II Main and Commercial Gates PA Memo # 1
Subject: Thursday, July 2, 2020 7:2 : AM
Date:

-----Original Message-----

From:
Sent: Sunday, June 14, 2020 5:26 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] J-017-II Main and Commercial Gates PA Memo # 1

Hello,

I have questions regarding the J-017-II Main and Commercial Gates PA Memo # 1

One sites associated with this project was eligible for the national register of historic places. Now that it has been "data recovered," does this mean the site has been cleared, therefore it has lost its eligibility?

What does "data recovery" entail? Is it a consistent process of recording and removing artifacts? If it varies, please provide a detailed description of the data recovery process involved with this site, including whether it has been bulldozed, etc. Please also provide photos.

Where are the artifacts being placed? Please provide a list of each of the artifacts and where they currently are located.

If in an empty field, as was done with Magua' artifacts, what timeline exists, if any, to move them to their permanent location? Where will they be permanently housed and in what conditions?

Which artifacts were considered "significant" enough to preserve and what happened to the items not considered significant by your archaeologist? Were they discarded?

I look forward to your response.

From:
Sent: Thursday, July 16, 2020 7:52 AM
To: CRIWebComment
Subject: [Non-DoD Source] Protest the Signing of the INRMP

As a U.S citizen I protest the signing of the Integrated Natural Resource Management Plan (INRMP) that would allow the construction of the Live-Fire Training Range Complex (LFTRC) at Andersen Air Force Base. I vehemently protest the detrimental impacts that the firing range would have on the ancient village of Litekyan (Ritidian), Urunao, and Jinapsan and all of the species, endangered or otherwise, within the Guam Wildlife Refuge. I protest the signing of the INRMP for the following reasons:

1. Of the options considered, building the LFTRC at the Northwest Field would be the most destructive option to the environment, the natural and cultural resources, and to the communities surrounding the area.
3. The 2010 and 2015 Records of Decision underestimate or leave out the impacts of endangered species in the Refuge Overlay of the Guam National Wildlife Refuge.
4. Mitigation efforts are not sufficient to protect endangered species. Avoidance of adverse effects stemming from the construction and operation of live-fire ranges is the only option.
5. The LFTRC poses a tremendous risk of contaminating Guam's primary fresh water resource – the Northern Guam Lens Aquifer (NGLA).
6. The impact on ancestral and historic sites cannot be mitigated because many of the resources at the site still remain in pristine, undisturbed condition and are still being studied. Furthermore, Litekyan/Ritidian is a sacred site for native people and a place of spiritual connection to their ancestors.
7. The construction of the LFTRC constitutes an environmental injustice to the indigenous people of Guam, the Chamorro people, and further disempowers native communities through militarization and contamination of their land.

Sincerely,
Alexandra Herrmann

Edmonds, WA

From:
Sent: Thursday, July 16, 2020 7:48 AM
To: CRIWebComment
Subject: [Non-DoD Source] Protest signing of the Integrated Natural Resource Management Plan

As a U.S citizen I protest the signing of the Integrated Natural Resource Management Plan (INRMP) that would allow the construction of the Live-Fire Training Range Complex (LFTRC) at Andersen Air Force Base. I vehemently protest the detrimental impacts that the firing range would have on the ancient village of Litekyan (Ritidian), Urunao, and Jinapsan and all of the species, endangered or otherwise, within the Guam Wildlife Refuge. I protest the signing of the INRMP for the following reasons:

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4. Mitigation efforts are not sufficient to protect endangered species. Avoidance of adverse effects stemming from the construction and operation of live-fire ranges is the only option.
5. The LFTRC poses a tremendous risk of contaminating Guam's primary fresh water resource – the Northern Guam Lens Aquifer (NGLA).
6. The impact on ancestral and historic sites cannot be mitigated because many of the resources at the site still remain in pristine, undisturbed condition and are still being studied. Furthermore, Litekyan/Ritidian is a sacred site for native people and a place of spiritual connection to their ancestors.
7. The construction of the LFTRC constitutes an environmental injustice to the indigenous people of Guam, the Chamorro people, and further disempowers native communities through militarization and contamination of their land.

Sincerely,

Jennifer Herrmann

Edmonds, WA 98026

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Comment # 68

From:
To: FW: [Non-DoD Source] No Marine Corps Base
Subject: Thursday, July 2, 2020 7:20:11 AM
Date:

-----Original Message-----

From:
Sent: Tuesday, June 9, 2020 1:40 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] No Marine Corps Base

The people of Guam do not want this base built.
Stop taking our land and our sacred spaces from us. Respect the Chamorro people.

Comment # 69

From:
To: [CRIWe Comment](#)
Subject: [Non-DoD Source] PrutehiMari nas
Date: Thursday, July 2, 2020 :0 : 2 PM

Buenas yan Håfa Adai

I am writing to you in regard to the desecration of three cultural sites for the use of military projects. For the longest time, Guåhan has struggled in the fight against protected waters and land. The land and waters of Guåhan are imperative to our livelihood and the generations to come, for we come from the land and it is our duty to protect what has given us life. The extensive measures taken to strip the land is very detrimental to us people for our ancestors have roamed here and are buried on these grounds.

I strongly object to the further actions taken at the site due to inadequate research and the desecration of our ancient burials and land, endangered species, and invaluable resources that compromise the health of our island. Our physical and spiritual health.

Our community demands to assemble local experts and advisors regarding this build-up, establish elaborate plans regarding the aquifer, mitigation efforts, and many resources that will benefit the local community of Guåhan.

Due to the lack of detail and transparency surrounding this build-up, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive.

Inafa'maolek. Please.

Comment # 70

From:
To: FW: [Non-DoD Source] Stop Project J-017
Subject: Thursday, July 2, 2020 7:30:00 AM
Date:

From: Bruce
Sent: Wednesday, June 24, 2020 4:27 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Stop Project J-017

Hi my name is Bruce Julian and I'm writing to demand you to immediately stop project J-017. The destruction of three cultural sites eligible for the National Register of Historic places is unconscionable and incredibly disrespectful to the Chamoru people.

These sites contain incredibly important information for our heritage as a people and it is time for the US military to begin making amends for their continual attempts to erase our culture and history. This is just the latest racist attempt, harkening back to the days of making our beaches white only to banning the use of our language among countless other offenses.

Enough is enough, you have abused our land and people for far too long and it needs to stop here. We implore you to stop the greed and destruction that is irreparably harming our people.

Thank you
Bruce Julian
Mangilao GU 96913

Comment # 71

From: FW: [Non-DoD
To: Source]
Subject: Thursday, July 2, 2020 7: 3:0 AM
Date:

From: Krstpz
Sent: Tuesday, June 30, 2020 4:36 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source]

Please don't do it. I am native chamorro. This island too small i don't want it overpopulated and polluted i don't want to lose our culture its all we have. we are a small island please respect us.

From:
Sent: Sunday, July 12, 2020 5:13 PM
To: CRIWebComment
Subject: [Non-DoD Source] Project J-017

Hello,

My name is Laura Lacombe and I am writing to you on behalf of the citizens of Guam from the city of Long Beach, California. I have read about the harmful military project J-107 and feel that I must add my voice in condemning this expansion of the marine base. A memo sent out by the military stated that three historic sites, all eligible for the National Register for Historic Places, would not be affected. This was not the case. They were cleared and destroyed, lost forever.

I am horrified by the clearing of these sites, which hold great significance to the culture and identity of the Chamorro people. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information, involvement, comments, and critique that could have made project changes to preserve the sites. This is a horrific injustice against the Chamorro people and we will not stand for it.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of the ancient burial sites and the permanent destruction of land, endangered species, and invaluable resources, including the risk of compromising the Island's main water source.

The 212 square mile island you are occupying does not need another military base. This land and culture is sacred, and it is your responsibility to protect it.

Sincerely,
Laura Lacombe

From:

Sent:

Wednesday, July 15, 2020 5:28 PM

Subject:

[Non-DoD Source] Comment RE: Project J-017

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Kristen Laguaña

Comment # 74

From:
To: FW: [Non-DoD Source] Lite yan
Subject: Thursday, July 2, 2020 7:37:0 AM
Date:

-----Original Message-----

From: Teresa
Sent: Friday, June 26, 2020 4:38 AM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Litekyan

Hafa adai,

I am writing to you as a concerned indigenous daughter of this island Guahan, who deeply cares about the crime you are committing on my island home. You do not understand that it is a crime because you are not from this land and do not respect our values and culture. If you did you would know that my land is sacred and I do not destroy or pollute it. Some of us have been colonized to that way of thinking and it's all because of your ancestors and because of you, who choose to continue to follow their ways. By destroying acres of land that is filled with what I value as sacred, is an act of crime against me. You do not see it as a crime because again you do not respect and understand my cultural values. Your values and your ways are not above my values. This is not your place. Stop the destruction, stop this crime. My island is not a strategic location. My island is my home. You have no respect and no dignity for what you are doing.

Enough is enough!

Terēsa Rose P. Lagaña

From:
Sent: Thursday, July 16, 2020 10:43 AM
To: CRIWebComment;

Subject: [Non-DoD Source] Public Concern

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

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I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

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Senseramente,

Devyn Lauren

From:
Sent: Monday, July 6, 2020 11:34 AM
To: info@mitteis.com; CRIWebComment; Connor Law
Subject: [Non-DoD Source] public comment about EIS

I completely disagree with the testing Navy is doing and planning to do, as well as the cultural grounds being "excavated" and moved. The testing is going to damage our aquatic life around the Island, as well as the citizens of Guam. The Navy and Military have done tests in the past and it has caused cancer problems on the Island and has also destroyed our aquatic life in some areas around the Island.

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

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I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

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Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Comment # 77

From: FW: [Non-DoD
To: Source] Comment
Subject: Thursday, July 2, 2020 7:2 : AM
Date:

-----Original Message-----

From: Donald Leisure
Sent: Tuesday, June 2, 2020 3:26 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Comment

Good Morning,

I think the Marine Corps Base project is a great idea. The Yigo area is under-developed and this will allow businesses to expand their customer base. We've seen how the Covid crisis has crippled the tourism industry on Guam. More jobs to go along with the base will be needed. Thanks for reaching out for public comment.

-Don Leisure-

Comment # 78

From:
Sent: Saturday, July 4, 2020 12:27 AM
To: CRIWebComment
Subject: [Non-DoD Source] Preserve Our Island

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

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I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

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Conduct village-wide town halls on the issue

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Senseramente,

Peara Leota

Comment # 79

From:
To: FW: [Non-DoD Source] Guam, Project J-017
Subject: Thursday, July 2, 2020 7:3 : AM
Date:

From: Jaidan Lujan
Sent: Thursday, June 25, 2020 1:47 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Guam, Project J-017

Hello,

The indigenous people of Guam have repeatedly requested that a new military base not be built. The proposed location is both culturally and historically significant to residents. Guam already has a significant military build-up and does not need any more added.

Thank you,
Jaidan Lujan

From:
Sent: Thursday, July 2, 2020 7:40 AM
To:
Subject: FW: a concerned Chamorro

From:
Sent: Monday, June 29, 2020 3:52 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] a concerned Chamorro

Buenas yan Hafa Adai,

I am a Chamorro Italian female college student entering my senior year of college in the States and news of a harmful military project (proposed to span 57 acres of land in northern Guam for yet another military base on our 212 square mile island) has led me to email you. Like many other Chamorros on island and in diaspora/away from our home island, I am saddened to hear this news knowing the military happily takes our land and claims our people for covert and overt military uses but does not always do right by them. Both my grandfathers served in the armed forces, out of necessity and lack of better opportunity; my parents moved me off island in search of more. I was born on Guam and relocated at the age of 2; I often wonder what life would have been like on island, to feel the excruciating reality of moments like this. No matter where I live, I am Chamorro and stand by the protection of rights for my people and our island.

As you can tell, I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information, involvement, comments, and critique that could have made project changes to preserve the site. To make some kind of attempt at not disrespecting our lands and history so blatantly obvious. Naturally I object to further at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding build project in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Gabby Lupola

P.S. the way our island community fought for Pagat was not a one time protest; we will continue to resist.

From:
Sent: Saturday, July 4, 2020 3:11 AM
To: CRIWebComment;

Subject: [Non-DoD Source] Protect Guåhan

Buenas yan Háfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

What needs to be done:

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Paula

From:
Sent: Thursday, July 2, 2020 7:42 AM
To:
Subject: FW: [Non-DoD Source] Project J-017

From:
Sent: Monday, June 29, 2020 8:05 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Project J-017

Hello,

I am writing in with regards to what is happening in the island of Guam and in the Marianas Islands. I would like to say that how our islands are being treated is quite disgraceful to the people of Guam and to the Chamorro culture.

I urge you to do better for our ancient artifacts and for our cultural heritage sites. I urge you to not build firing ranges on our islands as they can harm birds and wildlife and all fauna and flora. Again, Please do not build firing ranges on our islands please do not use our islands for testing sites as it's harmful and can pollute the surrounding waters of the Marianas Islands. These waters and roots run deep. We know our culture and want to learn more and understand more but we cant do so with all of your aggravated actions to our land without proper respects paid and acknowledged.

The people of Guam have been oppressed and given up the use of their land for far too long. Not only do you take what you want from the islands, the people of Guam don't even get proper civil rights to vote like all Americans should be allowed.

My family has been on the islands since before we can remember and it breaks our hearts to see how our islands are being used and how our people are being used.

Please do better for the Chamorro People. We deserve respect and for our voices to be heard. We are the shield and spear of all the US might yet our concerns are not heard or met. Do better.

Si yu'us maase.

Royce P. Manglona Guerra

From:
Sent: Thursday, July 2, 2020 7:15 PM
To: CRIWebComment
Subject: [Non-DoD Source] Project J-017 Complaint

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. **We do not need another military base on our 212 square mile island.**

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

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Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Chelsea Manibusan

From:
Sent: Thursday, July 2, 2020 7:41 AM
To:
Subject: FW: [Non-DoD Source] Regarding the cultural sites of my indigenous people

From:
Sent: Monday, June 29, 2020 4:21 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Regarding the cultural sites of my indigenous people

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity public review prevented meaningful public information, involvement, comments, and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

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Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding build project in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,
Joleen Manibusan

GDOE SY 2019-2020

From:
Sent: Thursday, July 16, 2020 10:00 AM
To: CRIWebComment;
Subject: [Non-DoD Source] We Chamoru People Stand for the Preservation of our Sacred Land and Indigenous Culture

Buenas yan Håfa Adai,

My name is Joleen Marie T. Manibusan and I am a teacher for the Department of Education on Guam. I have been teaching middle school English since 2015. I have a Bachelor's degree in English and a Master's degree in Education, M.A.T.

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

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Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

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Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Joleen Marie T. Manibusan

Comment # 86

From:
To: FW: [Non-DoD Source] Project J-017
Subject: Thursday, July 2, 2020 7:2 :02 AM
Date:

From: Raylene M
Sent: Friday, June 12, 2020 2:38 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Project J-017

I have some concerns about Project J-017.

Chamoru people have been exerting their energy and commenting for decades, but still, the United States military is not convinced or simply does not care about how harmful these projects are.

On top of the fact that Latte Period artifacts and human remains were mishandled (I don't care for a rebuttal; It was on the news), a 57 acre base is going to be built where the ancient Chamoru village of Magua once stood. How much land, exactly, does the United States military plan on seizing from the Chamoru people?

It is clear that this project is being constructed without an ounce of remorse.

Solution: All military personnel on Guam must undergo cultural sensitivity training, and must be taught Chamoru History and Indigenous Rights. Chamoru Rights Activists have been trying to educate them for decades, but their efforts continue to be wasted.

I hope you remember that land is important to the Chamoru culture, yet land is constantly taken from the Chamoru people.

I urge you to stop participating in cultural erasure, or at least feel some sort of remorse and acknowledge that you are disrespecting the Chamoru people.

Sincerely,
Raylene Manley

Ufisinin i Sinadora Kelly Marsh (Taitano), PhD

I Mina'trentai Singko Na Liheslaturan Guåhan

Gé'helo', Kumitehan Irensia yan i Atte siha, Plasét siha, Fina'tinas Guåhan,
Finamta' Hagåtña, Dinitetminan Maisa, yan Asunton Rihinát Siha



July 15, 2020
(Chamorro Standard Time)

Public Comment on J-017 PA Memo:

Along with the numerous constituents that have contacted me directly, I am deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. Those sites which were cleared hold great significance to CHamorus and their culture and identity.

It is unacceptable that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review and input prevented meaningful public information sharing, involvement, comments, and critique that could have informed the project to make the appropriate decision to preserve the site.

I join their objection to further action at the site for the proposed marine base due to inadequate background research, the desecration of CHamoru ancestral burials, and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites and the context of a special aspect of living pattern of CHamoru ancestors, of which few examples exist and which has not yet had the opportunity to be well understood is a grave loss for Guåhan. Much of the answers these sites could have provided have been wiped off the face of this island. Those answers lost forever. That part of the CHamoru ancestral lifeway perhaps never to be known as a result. How many more sacred sites have been cleared for this marine base and other buildup projects, we may never know the full answer to that question.

Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that survived hundreds or thousands of years, were hand crafted by ancestors, and are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of the CHamoru identity lost that they cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I agree with their assessment that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared. I support their objection to any future clearings of our cultural sites or artifacts. As our community and our leaders have stated many times prior, these special parts of the CHamoru identity must be preserved in place.

Office of Senator Kelly Marsh (Taitano), PhD

Thirty-fifth Guam Legislature

Chairperson, Committee on Heritage and the Arts, Parks, Guam Products,
Hagåtña Revitalization, Self-Determination, and Regional Affairs

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. It is cumbersome, the provision of actual awareness about calls for community input is sorely lacking, as well as is difficult to access for most community members. More often than not, these memos lack complete information and detailed mitigation plans.

I request that the Department of Defense utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry:

- Work with the Civilian-Military council to formulate strategies that better inform, engage, and solicit public comments from the community
- Assemble local experts and advisers on military statements regarding the buildup to better inform the community about the undertakings
- Prevent further disruption of ancient sites by preserving ancestral sites in place
- Provide detailed maps and meaningful information of ancestral and historic sites on base

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

I call on the DoD to show real commitment to the community by implementing the actions noted above.

A handwritten signature in black ink, appearing to read 'K Marsh', with a long, sweeping horizontal line extending to the right.

Senator Kelly Marsh (Taitano), PhD
35th Guam Legislature



Micronesia Climate Change Alliance
PO Box 7810 Tamuning Guam 96913
micronesiacimatealliance@gmail.com
671-998-2169

July 15, 2020

Hâfa Adai yan Tirow,

Micronesia Climate Change Alliance (MCCA) is non-profit headquartered in Guahan that was founded to create community centered solutions to the climate crisis in Micronesia. Our islands are at the forefront of the devastating impacts of the warming temperatures due to the unprecedented amount of Carbon dioxide in our planet's atmosphere. Our region is disproportionately affected and we contribute very little to the emissions that are causing issues such as coral bleaching, increase in severity and number of cyclones, drought and sea level rise. We are committed to climate justice and peace in Micronesia and across the world.

We value the ancestors and their contributions to our islands and people. As such we are deeply disturbed by the desecration of three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. The clearing of these sites adds to a history of erasure of the Chamoru people and their heritage at the hands of the US Government. Furthermore, the lack of public review and meaningful community engagement on this issue is deplorable. More needs to be done by the Navy and the Guam Historic Preservation office or Historic Resources Division (GHRD) to involve our community, There must be a process set in place and expand the Programmatic Agreement so that community members and interested parties can express concerns, give critique and offer suggestions to aid in preserving the precious historic sites.

MCCA advocates for a halt to further action at the site for the proposed marine base. We call into question the research methodology and preservation plan by the DoD. It is so blatantly inadequate in it's background research and measures to mitigate harmful impacts. The GHRD and the Navy need to be more diligent in ensuring that there is no desecration of ancient burials and that all burial sites be preserved in place. Data Recovery is NOT preservation. No sites that meet criteria for the National Register of Historic places should be impacted.



Micronesia Climate Change Alliance
PO Box 7810 Tamuning Guam 96913
micronesiaclimatalliance@gmail.com
671-998-2169

What has occurred thus far in regards to this project areas are the permanent destruction of land, endangered species, and invaluable resources, including the risk of compromising our island's main water source. With our planet experiencing an environmental crisis, it is imperative that we protect all trees as they absorb carbon and release oxygen. Our future generations need the forests that have been destroyed. They do not need weapons, wars and greed.

MCCA supports and echos the calls for more transparency, and the necessary amendments to the Programmatic Agreement that Prutehi Litekyan Save Ritidian (PSLR) has outlined in their comments and letters to the DOD and GHRD. The community of Guam and all people of Micronesia deserve to have more sovereignty and decision making power when their lands, waters and ancestral remains are slated to be impacted. The US Military has a sordid and ongoing history in Micronesia. Our islands and peoples are used as sacrificial zones in the US imperial enterprise. The ongoing contamination of sacred lands, desecration of cultural sites and the threat to the fresh water sources on Guahan is tantamount to a slow genocide. These lands are life giving and we are so grateful for the abundance they provide. Destroying these resources without the consent of indigenous people is a major injustice.

The military industrial complex needs drastic reassessment and reprioritization. Given the pandemic and climate change, the billions of dollars used by the DoD needs to be diverted to meet community needs and fund real solutions. The US Military is the single largest consumer of fossil fuels and single largest polluter of greenhouse gasses. We want to appeal to the humanity of those in leadership positions. We pray that your hearts and minds reflect and act for the best interest of our collective home, Earth, and the future generations,

Si Yu'os Ma'ase,

Micronesia Climate Change Alliance

Antoinette Charfauros McDaniel
Rocky River, OH.

July 15, 2020

Buenas yan Håfa Adai,

I am writing from the Chamoru diaspora to add my voice to the cries of outraged indigenous Chamoru people deeply disturbed by the wanton disregard for ancient Chamoru artifacts, burial sites, and the profound harm posed to the natural and environmental resources of my ancestral homeland. My parents, both of whom have gone on to their great reward in the recent years, lived through the Japanese occupation as young children. Their parents and grandparents survived forced labor camps during the Japanese occupation and the death march which led up to the U.S. "liberation" of the Island.

My father, Tun Jesus Q. Charfauros, and my mother, Tan Victoria Blas Charfauros, were educated in public schools on the island as small children through young adulthood. My mother was a graduate of George Washington High School. My father completed high school at Father Duenas. Both were taught that speaking our indigenous language was shameful and "backwards". As a young man, my father, like so many Chamoru men of his generation and since, joined the U.S. Navy and served this nation for twenty years with honor and distinction. During his military service, he was exposed to Agent Orange in Vietnam and later to asbestosis, which led to his premature death. The militarization of our homeland indelibly shaped my parents' and my own life in the Chamoru diaspora. I never learned to speak my native language and am only doing so now at the age of 57. I doubt that I will ever be fluent, but I will die trying. I am an educated woman, a sociologist, a citizen, a parent, and the wife of a retired Naval Commander. Recognizing each of these facets of my life, of who I am and what I hold dear, it's also clear that every part of who I am has been fundamentally shaped by the fact that I am also an indigenous Chamoru woman, a haga haga' of Guahan.

For these reasons, I am writing to add my voice to those Chamorus and our supporters who are expressing profound distress regarding the destruction of three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source. Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

- Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community
- Assemble local experts and advisers on military statements regarding the buildup
- Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts
- Establish a plan for increased local oversight of the Northern Guam Lens Aquifer
- Assess future Department of Defense plans on island
- Prevent further disruption of ancient sites and preserving historical sites in place
- Request detailed maps from the military of historic sites on base
- Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, as an off-island but ardent and interested Chamoru who retains her deep love and commitment to my homeland, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Si Antoinette Charfauros McDaniel
Capili yan Chungi' Clans, Taotao Guahan
Rocky River, Ohio

From:
Sent: Wednesday, July 15, 2020 3:09 PM
To: CRIWebComment; patrick.lujan@dpr.guam.gov
Cc:

Subject: [Non-DoD Source] Concerns Regarding Project J-017

Buenas yan Håfa Adai,

My name is Camarin Meno. As a CHamoru woman and citizen of Guåhan, I am deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am outraged by the clearing of these sites, which hold deep significance to the Indigenous people of Guåhan. I am absolutely stunned that the public was not given the opportunity to voice their questions and comments prior to the destruction of these sites, and that we have only been given this chance after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments, and critique that could have helped to preserve these sites.

I object to further action at the site for the proposed marine base as such action would desecrate ancient Indigenous burial sites, harm endangered species, and risk compromising the island's main water source.

Losing three cultural sites is a grave loss for Guåhan. Mitigation through “data recovery” is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impact on our cultural resources represents a part of our identity that can never be recovered.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. The value of these cultural sites far outweighs any potential gain we would receive from another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon contained in the PA Memo ultimately leave us with more questions than answers. More often than not, these

memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones, and remnants of our ancient past. Where is the military placing our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. I also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" by the DOD. In addition, local leaders and the DOD must institute the following measures relative to build-up projects. Failure to do so will result in further public outcry.

1. Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community
2. Assemble local experts and advisers on military statements regarding the buildup
3. Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts
4. Establish a plan for increased local oversight of the Northern Guam Lens Aquifer
5. Assess future Department of Defense plans on island
6. Prevent further disruption of ancient sites and preserving historical sites in place
7. Request detailed maps from the military of historic sites on base
8. Assess via local efforts the buildup's economic impacts to the island
9. Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

There is only one homeland for the Indigenous people of Guåhan. All who live and work on this island have a responsibility to protect this precious home, including the sacred resting places of CHamoru ancestors and the aquifer that will nourish future CHamoru generations to come.

Si Yu'os Ma'åse,

Camarin Meno

From:
Sent: Thursday, July 2, 2020 7:40 AM
To:
Subject: FW: [Non-DoD Source] Proj - j-017

From:
Sent: Monday, June 29, 2020 3:41 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Proj - j-017

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity public review prevented meaningful public information, involvement, comments, and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

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Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding build project in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Pete Mesa

From:
Sent: Tuesday, July 14, 2020 2:21 PM
To: CRIWebComment
Subject: [Non-DoD Source] J-017 Public Comment

Hafa adai,

I am deeply concerned by the desecration of three cultural and historic sites that were cleared as part of product J-017. As fellow protestors have claimed: "Guam does not need another military base" and our "ancestors do not belong in plastic bags"

This project poses a great risk to the cultural, historic, and natural sites on our island. No one would permit the desecration of Jamestown, the liberty bell, or Notre Dame to build a military base. The same regard is not given for CHamoru sites. J-017 disturbs our heritage, destroying it forever, and cutting CHamorus off from it.

I know the Navy is only beholden to the American Imperialist project, but I have faith in my fellow organizers. I am sure you have seen the demands of Prutehi Litekyan, I want to reiterate them and ask: what have you done with the remains and artifacts? Not that they have been unearthed, what will you do with them? What else will you destroy from your stolen base?

- Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community
- Assemble local experts and advisers on military statements regarding the buildup
- Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts
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- Assess via local efforts the buildup's economic impacts to the island
- Conduct village-wide town halls on the issue

You continue to ignore the indigenous CHamorus as we maintain our water must be protected and our historic sites must be left in place.

Senseramente,

Aidan Moore

Comment # 93

From:
To: [CRIWe Commen](#)
Subject: [Non-DoD Source] Comments Regarding Project J-017
Date: Wednesday, July 1, 2020 3: 2:20 AM

Buenas yan Hafa Adai,

My name is Julia Faye Munoz and I speak to you in my capacity as a member of the community and as a CHamoru daughter of Guåhan. I am deeply concerned and outraged by the handling and outcomes of Project J-017, which has entailed the clearing of three historic sites eligible for the National Register of Historic Places, and extends into the area where our ancient CHamoru village of Magua' was cleared. The clearing of these sites entails the destruction of sacred CHamoru lands, including the desecration of the remains of our ancestors and the removal of culturally and historically significant artifacts. The whereabouts of the discovered ancestral remains and artifacts have yet to be made transparent, and the process of "data recovery" has proven inadequate and lacking sufficient information in preserving these ancestral remains and artifacts. I am concerned by the developmental impact and consequent contamination upon our environmental resources, including our aquifer which supplies about 80% of our island's drinking water. I am dissatisfied with the PA Memo process, as DOD's determination that "the design and construction of this process will not affect historic properties" lacks comprehensive information and mitigation plans regarding the clearings, apart from the fact that the clearings do entail that historic properties are negatively affected. Additionally, I am angered that the comment period for this project followed the clearing of these ancient sites, as this has prevented meaningful involvement and input from our island community. Denying the opportunity for our community's involvement is a blatant disregard of both the sacredness of our land and of the will of our people in protecting and defending these spaces--spaces intrinsic to our cultural identity and overall welfare. I object to further action at the site for the proposed marine base, as there is an insufficiency in background research, and the consequences of the ongoing military development has entailed the destruction and desecration of our lands and waters—including the desecration and removal of ancestral remains and cultural artifacts located at the site. The will of the CHamoru people and the general population of Guåhan to preserve these sites should be respected. In order for meaningful dialogue to occur, our people must be consulted and given the opportunity to participate in any and all discourse concerning the military construction and development on our lands and waters.

Si Yu'os ma'åse',

Julia Faye Munoz

From:
Sent: Thursday, July 2, 2020 7:41 AM
To:
Subject: FW: Concerned citizen.

From:
Sent: Monday, June 29, 2020 4:57 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Concerned citizen.

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity public review prevented meaningful public information, involvement, comments, and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding build project in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Sent from my iPhone

Comment # 95

From:
To: [in o CRIWe Comment](#)
Subject: [Non-DoD Source] Project J-017, Marines Relocation Criticism
Date: Friday, July 10, 2020 3:12:23 PM

Hafa adai,

I am emailing as a resident of Guam and indigenous Micronesian expressing my concern and outright disapproval for the military's relocation or expansion. This looks too much like cultural genocide, an aspect of colonization no different from when Spanish conquerors burned Guam's villages and Wayfinder boats and forcibly took over. Now, because of colonial assimilation, Guam's Chamorro culture barely survives. It will not survive at all if their historical lands are destroyed. If the people of Guam are truly U.S. Citizens, then their voices should be heard. The democracy-focused U.S. government, including its military, are beholden to the citizens it is sworn to represent. Please consider this.

Thank you,

Shannin N.

From:
Sent: Thursday, July 2, 2020 7:43 AM
To:
Subject: FW: [Non-DoD Source] REGARDING PROJECT J-017 GUAM IS NOT FOR YOUR USE

From:
Sent: Tuesday, June 30, 2020 12:08 AM
To: CRIWebComment <criwebcomment@navy.mil>;
Subject: [Non-DoD Source] REGARDING PROJECT J-017 GUAM IS NOT FOR YOUR USE

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

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Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Jessica Nakajima

From:
Sent: Wednesday, July 1, 2020 8:37 AM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source]

Buenas yan Háfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

☐ Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

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Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Lia Rose Naputi

From:
Sent: Thursday, July 2, 2020 7:43 AM
To:
Subject: FW: [Non-DoD Source] Project J-017 Public Comment

From:
Sent: Monday, June 29, 2020 9:54 PM
To:
Subject: [Non-DoD Source] Project J-017 Public Comment

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

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I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

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Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente, Cassie N.

From:
Sent: Monday, July 13, 2020 2:32 PM
To: CRIWebComment
Subject: [Non-DoD Source] Comment on Project J-017

Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to CHamoru culture and identity.

As a third-generation Filipino who calls Guam home, I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of CHamoru ancient burials and the permanent destruction of CHamoru land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of CHamoru sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of Guam's cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of CHamoru historical artifacts, remains of Chamoru ancient ones and remnants of CHamoru ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of CHamoru and Guam history be preserved in place.

Sincerely,

Kristin Oberiano

--

Kristin Oberiano
PhD Candidate
History Department
Harvard University

From:
Sent: Monday, July 6, 2020 11:34 AM
To: CRIWebComment; info@mitt-eis.com
Subject: [Non-DoD Source] Public Comment

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Sierra Nicole Onedera-Gregory

From:

Sent:

Wednesday, July 8, 2020 8:54 AM

Subject:

[Non-DoD Source] Public Comment on Project J-017

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of Chamorro three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to Chamorro culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of Chamorro ancient burials and the permanent destruction of Chamorro land, endangered species, and invaluable resources, including the risk of compromising the island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more Chamorro sacred sites have been cleared for this marine base and other buildup projects? The Chamorro community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering Chamorros are losing sites that are irreplaceable and culturally invaluable.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. **They should have never been cleared, and I OBJECT to any future clearings of Chamorro cultural sites or artifacts.** As the Chamorro community has stated many times prior, these special parts of Chamorro identity must be preserved in place. We do not need another military base on this 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of Chamorro historical artifacts, remains of Chamorro ancient ones and remnants of Chamorro ancient past. Where is the military putting Chamorro artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Chamorro community deserves to know these answers.

I urge SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. I also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact Chamorro cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to build-up projects:

- Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community
- Assemble local experts and advisers on military statements regarding the buildup

- Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts
- Establish a plan for increased local oversight of the Northern Guam Lens Aquifer
- Assess future Department of Defense plans on island
- Prevent further disruption of ancient sites and preserving historical sites in place
- Request detailed maps from the military of historic sites on base
- Assess via local efforts the buildup's economic impacts to the island
- Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of Chamorro cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, Chamorro community has urged that these invaluable parts of Chamorro history be preserved in place.

Senseramente,

Dominique Ong

From:
Sent: Thursday, July 2, 2020 7:27 AM
To:)
Subject: FW: [Non-DoD Source] Comment on Military Relocation to Guam and CNMI

From:
Sent: Sunday, June 7, 2020 9:25 AM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Comment on Military Relocation to Guam and CNMI

Dear CRI Web Comments,

My name is Josephine Ong, a Ph.D. student in Gender Studies at UCLA that grew up in Guåhan.. As a graduate student that has extensively studied the Marianas and someone that grew up in Guåhan, I am alarmed by the potential negative consequences of the Military Relocation to Guam and CNMI Programmatic Agreement's Project J-017. Project J-017 proposes the construction of an Area a Distribution Nodes and Site Telecom Cabling Naval base in North Finegayan, Guam, which is located in the highly populated village of Dededo. Thus, I am writing to voice my concerns about the J-017 Project and the information relayed in its first memo.

I am concerned about the social and environmental threats increased U.S. militarization would have, especially considering the military's intentions to build a base in Guåhan's most populous village, Dededo. For example, Project J-017's first memo specifically cites that "Site preparation and project work includes grading, digging, trenching, drilling, boring and/or cut and fill to construct two single-story ADNs along with site improvements consisting of pavement around the ADNs for vehicle circulation and parking, drainage, and utility systems as well as installation of communication lines." Heavy construction within Guåhan's most populated village could result in noise pollution, runoff from extensive digging, and potential displacement. Furthermore, the memo also mentions that construction "may require munitions and explosives of concern (MEC) removal and associated efforts" in a civilian area that contains a substantial portion of Guåhan's population.

In addition, the U.S. military's plan to build a Naval base in Dededo would also have substantial negative cultural consequences. According to the Programmatic Agreement's first memo, "Site 66-08-233 was a large Latte Period/early Post Contact and First American Territorial Period site...[that] was determined eligible for listing in the NRHP under Criterion 7." Furthermore, GHPI Site 66-08-2307 also contains "Human bone fragments [that] were recovered from an earth oven on the site, suggesting it was deposited during the period of the oven's use." Constructing a military base on top of Chamorro ancestral remains is a disrespectful act that violates Chamorro historical and cultural practices. While the Native American Graves Protection and Repatriation Act specifically applies to federally recognized tribes, similar practices of respect for deceased ancestors also apply in Guåhan.

There are only a few examples of the intended Project J-017's alarming social and environmental consequences. As an expert in the history of the Marianas and former resident of Guåhan, I question whether the military is adept in adequately fulfilling its own requirements for environmental and historical site protection. Given the substantial environmental and cultural consequences construction

of the Naval base in Dededo would have, I call for a rejection of Project J-017 and call for further conversation with Guåhan residents to discuss community alternatives to the project.

Best,

--

Josephine Ong, M.A. (she/her/hers)
Ph.D. Student, Gender Studies
University of California, Los Angeles

UCLA acknowledges the Gabrielino/Tongva peoples as the traditional land caretakers of Tovaangar (Los Angeles basin and So. Channel Islands). As a land grant institution, we pay our respects to Honuukvetam (ancestors), 'Ahihirom, (elders) and 'eyoohiinkem (our relatives/relations) past, present and emerging.

From:
Sent: Thursday, July 2, 2020 7:40 AM
To:
Subject: FW: [Non-DoD Source] Comment for Project J-017

From:
Sent: Monday, June 29, 2020 3:40 PM
Subject: [Non-DoD Source] Comment for Project J-017

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity public review prevented meaningful public information, involvement, comments, and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding build project in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

--

Josephine Ong, M.A. (she/her/hers)
Ph.D. Student, Gender Studies
University of California, Los Angeles

UCLA acknowledges the Gabrielino/Tongva peoples as the traditional land caretakers of Tovaangar (Los Angeles basin and So. Channel Islands). As a land grant institution, we pay our respects to Honuukvetam (ancestors), 'Ahihirom, (elders) and 'eyoohiinkem (our relatives/relations) past, present and emerging.

Comment # 104

From:
To: [CRIWe Comment](#)
Subject: [Non-DoD Source] Project J-017
Date: Thursday, July 1, 2020 2:11:30 PM

Hello! I am emailing you today to demand that further progress with Project 1-017 is opposed. This project has already caused too much damage, such as the removal of the ancient ruins of Magua in 2018. The sites that have been cleared for this project have all been eligible for the National Register of Historic Places under Criterion D. The removal of these sites is further disrespecting the Chamorro community who has accepted you onto our island. I urge you to weigh your other options, and halt progress of this project until a decision may be reached that won't further erase our heritage and culture.

Sincerely,
Hurao Pablo-Cook

From:
Sent: Saturday, July 11, 2020 4:25 AM
To: CRIWebComment

Subject: [Non-DoD Source] The continued crimes of American colonialism

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

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Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

From:
Sent: Wednesday, July 15, 2020 6:39 PM
To: CRIWebComment
Cc:
Subject: [Non-DoD Source] Project J-017

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

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Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

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Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Aubi Pangindian

Comment # 107

From:
To: FW: [Non-DoD Source] Project J-017
Subject: Thursday, July 2, 2020 7:3 :3 AM
Date:

From: Taylor Paul
Sent: Thursday, June 25, 2020 11:26 AM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Project J-017

Hello,

My name is Taylor Paul. I am writing to ask you to **not** go forward with Project J-017. One-third of Guam's land is already occupied by military bases. Project J-017 is not worth it at the expense of polluting Guam's groundwater supply, destroying ancient cultural sites, and harming the health and culture of the residents of the island. The people of Guam can use this land for agriculture to live a more sustainable lifestyle. This project goes beyond contributing to the end of the CHamoru culture. It threatens Guamanian and CHamoru lives themselves. No life or culture is expendable. Please reconsider implementing Project J-017.

Thank you,
Taylor Paul

Comment # 108

From:
To: FW: [Non-DoD Source] Prutehi Marianas
Subject: Thursday, July 2, 2020 7:3 : AM
Date:

From: NP
Sent: Wednesday, June 24, 2020 2:54 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Prutehi Marianas

Buenas yan Hafa Adai,

I am writing to you today as a Chamorro Navy Veteran. I was born and raised on the island of Guam and we, as descendants of the first people of the land, have a unique connection to our land and our natural resources. Upon being medically retired from the Navy after 12 years in service, I contemplated returning home to my motherland, Guam. I was baffled and horrified at the thought of moving back to Guam knowing that a new marine base would be built, as well as many other additions you plan to stack upon my native land. After months and months of feeling depressed of this reality, I finally reached a decision to return home in the coming future and fight with my fellow Chamorro's as well as all others who are fighting against the loss of our land to the military. We have been through enough, especially with the size of our island, we cannot afford to lose anymore of our land, culture and our identity. Please, I urge you, to see the grave impact all of your actions would cause my fellow Chamorro's. We need this land for us, our spirits, our ancestors. I hope you find it in your hearts to understand our pleas and stop taking and destroying all we were gifted from our ancestors.

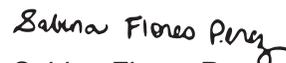
Very respectfully,

J.N. Perez Cruz

Further, the people of Guam must have a meaningful say in all matters affecting our environment and our heritage. By law, it is incumbent on the federal agency involved in the undertaking to include greater community input by actively seeking and expanding the list of concurring and interested parties. I believe that, henceforth, the consent of the people of Guam should be required before any action takes place which would have an adverse effect on the natural environment and historic properties. Lastly, I join members of the Guam community in making the following demands:

- Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community;
- Assemble local experts and advisers on military statements regarding the buildup;
- Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts;
- Establish a plan for increased local oversight of the Northern Guam Lens Aquifer;
- Assess future Department of Defense plans on island;
- Prevent further disruption of ancient sites and preserving historical sites in place;
- Request detailed maps from the military of historic sites on base;
- Assess via local efforts the buildup's economic impacts to the island; and
- Conduct village-wide town halls on the issue

Sincerely,



Sabina Flores Perez
Senator, 35th Guam Legislature

Comment # 110

From:
To: FW: COMMENT FOR PROJECT J-017
Subject: Thursday, July 2, 2020 7:3 :00 AM
Date:

From:
Sent: Wednesday, June 24, 2020 3:16 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] COMMENT FOR PROJECT J-017

There have already been three sites of CHAMORU HISTORY AND CULTURE trampled by your bulldozers to be paved for your military games. This is ERASURE. Post WWII, the military tried to erase my peoples culture and language. Here I am writing this to you and fighting the same things my grandparents, great grandparents and ancestors fought for. The military already occupies 30% of Guam. With this 52 acre land occupation that is almost half of Guam. The impact of this buildup is so detrimental to the people who have a home here. The people who treasure this island are witnessing its destruction done by the hands of you guys.

STOP IT. STOP THE DESTRUCTION. STOP THE ERASURE.

THIS ISLAND IS SACRED. THIS LAND IS SACRED. ALL LAND IS SACRED. TAKE YOUR WAR GAMES AND STRATEGIES OFF GUAM.

NO BUILD UP.

From:

Sent:

Wednesday, July 15, 2020 7:10 PM

Subject:

[Non-DoD Source] PRUTEHI LITEKYAN, IF WE DON'T THEN WHO WILL?

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

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Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

We must stop acting as if we have all of our islands to give to the military. There is only ONE island of Guam. There is only one chain of islands named the Mariana Islands. We must be the change we have been praying to see in the world.

Senseramente,

Symone Perez- Daughter of Guåhan

From:
Sent: Saturday, July 4, 2020 4:41 PM
To:
Subject: [Non-DoD Source] PROTECT the Island and its People

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

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Losing three cultural sites is a grave loss for Guañan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

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Senseramente,

--

Veronica Perez

From:
Sent: Wednesday, July 15, 2020 9:34 PM
To: CRIWebComment
Subject: [Non-DoD Source] J-017 comment

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

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Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

These projects serve only to further hurt relations between DOD and locals on Guam. I implore you to please reconsider and recognize the impact of these actions.

Senseramente,

Tasi Scout Petra

From:
Sent:
To: CRIWebComment;

Subject: [Non-DoD Source] Goggue yan Adahi Guåhan

Buenas yan Håfa Adai,

As a Chamoru language and culture teacher, I am deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to our Chamoru culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments, and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

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While the PA memo cited the three sites as eligible for the National Register of Historic Places under Criterion D, I argue that the cleared sites should also be considered as eligible under Criteria A, B, and C. They should

have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leaves us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones, and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

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- Assess future Department of Defense plans on island
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- Request detailed maps from the military of historic sites on base
- Assess the buildup's economic impacts to the island via local efforts
- Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Goggue yan Adahi Guåhan!

Senseramente,

Si Alyssa Posadas

From:
Sent: Thursday, July 2, 2020 7:41 AM
To:
Subject: FW: [Non-DoD Source] Public Comment for Project J-017

From:
Sent: Monday, June 29, 2020 4:31 PM
Subject: [Non-DoD Source] Public Comment for Project J-017

Buenas yan Háfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information, involvement, comments, and critique that could have made project changes to preserve the site.

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Regards,

Camille Quichocho

From:
Sent: Thursday, July 2, 2020 7:43 AM
To:
Subject: FW: [Non-DoD Source] Project J-017 Comment

From:
Sent: Monday, June 29, 2020 11:28 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Project J-017 Comment

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Senseramente,

Chauntae Quichocho

From:
Sent: Thursday, July 2, 2020 7:42 AM
To:
Subject: FW: Project J-017

From:
Sent: Monday, June 29, 2020 7:38 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Project J-017

Buenas yan Håfa Adai,

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Senseramente,

Loreal Quichocho

From:
Sent: Thursday, July 2, 2020 7:41 AM
To:
Subject: FW: [Non-DoD Source] i prutehi yan difende i islan guahan

From:
Sent: Monday, June 29, 2020 5:33 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] i prutehi yan difende i islan guahan

Buenas yan Håfa Adai,

I am a concerned indigenous citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments, and critique that could have made project changes to preserve the site.

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Senseramente,

Talysa Quintara C. Kakas

"No one is bad at anything, we are all just on different levels of success."

From:
To: FW: [Non-DoD Source] Project J-017
Subject: Thursday, July 2, 2020 7:30:3 AM
Date:

From: Noah
Sent: Friday, June 19, 2020 1:13 AM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Project J-017

To whom it may concern,

My name is Noah Rapadas, a resident of the island of Guam, and I wanted to express my opposition to Project J-017. The continuation of this project will further desecrate land that was sacred to my ancestors, the ancient village of Magua, and is sacred to me. My concern lies in the fact that there is little to no local oversight on the project to help steward the project in cultural competency. Additionally, local outreach has been extremely limited. As a resident of this island I propose that:

DoD moves forward with further transparency with local residents through town halls and outreach efforts

Assemble a group of local experts to advise on project

Increased local oversight on the Northern Guam Lens Aquifer, one of our only natural aquifers.

--

Best Regards,
Noah Rapadas
B.S. Civil Engineering '21
Santa Clara University

From:
Sent: Wednesday, July 15, 2020 7:00 AM
To: CRIWebComment
Subject: [Non-DoD Source] Project J-017

Buenas yan Håfa Adai,

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I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Sirena Rayphand

Comment # 121

From:
To: FW: [Non-DoD Source] No to Project J-017
Subject: Thursday, July 2, 2020 7:2 : AM
Date:

-----Original Message-----

From: Judi
Sent: Thursday, June 18, 2020 2:30 AM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] No to Project J-017

We do not want you to proceed with this project. The US has taken so much of our land and keeps us off of what is rightfully ours. Many members of the US military do not respect our land or our people.

Return our artifacts. Respect OUR land. Respect our PEOPLE.

Sincerely,
Judith Reyes
Sent from my iPhone

From:
Sent: Monday, July 6, 2020 9:52 PM
To: CRIWebComment;

Subject: [Non-DoD Source] Public Comment Submission for NAVY MITT SEIS

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the military clearing three of my cultural heritage sites as part of Project J-017, all of which were all eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments came AFTER these highly significant sites were already cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the sites. This clearing was not done in a way that was sensitive to or respectful of the people of Guam who have called this island home for 4500 years. No amount of mitigation can address or relieve this issue because it was done without consultation of the people.

I also object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source, the Northern Aquifer.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop.

Mitigation through "data recovery" or through the placement of objects from these sites for the public to view are not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. What makes them invaluable is also the placement from which they are found, which had been cleared without our consent. The data that has been available about our cultural heritage sites is outdated and needs to be

updated moving forward because any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. It is clear that the military did not comply with procedural requirements of NEPA by taking a "hard look" at the potential impacts of the proposed action and instead went on by clearing these sites.

As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island, and the only reason the marines are being moved to Guam is because they were unwanted in Okinawa. They are also unwanted in Guam, and I object to their presence here.

I had raised concerns of the preservation of my cultural historical sites in the 2015 SEIS and it is clear that my concerns were not addressed adequately. I want answers to how the DoD plans to mitigate my culture and preserve it in the future. I hope that a cordial relationship can still be formed through cultural advocacy and supplying Guam with much-needed project funding for cultural heritage projects such as Prutehi Litekyan, Sagan Kotturan Chamoru, and other cultural centers on island. If the DoD wants to use indigenous lands, they must pay for it through funding community-building programs for the culture and environment which they have desecrated so much of already.

I am also highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans, or they are scattered through various documents which need a team of people to unravel. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Conclusions of "significance" of effects clearly did not consider the unique context and sensitivity of the resources in our region. Our community deserves to know these answers.

I am also dissatisfied with the interim Programmatic Agreement which expired in 2019. In accordance with the terms of the Programmatic Agreement, if previously unknown cultural resources are discovered during applicable activities, the Navy will notify the appropriate Cultural Resources Manager and implement reasonable measures to avoid, minimize, or mitigate impacts to those resources. The DoD clearly failed to perform these required implementations. The "maximum level of mitigation" needs to be reevaluated in light of these recent actions and henceforth the DoD should engage appropriate local agencies such as cultural preservation office, the fisheries and wildlife management office, and the Guam EPA to reevaluate its mitigation through adaptive management or the appropriate consultations, as stated in the MITT Section 5.1.2.2.1.1.

In addition to our cultural resources being destroyed, I would like the DoD to also examine how this marine base will impact the environment in the area of the base. There are incredibly vulnerable species in the area which are sensitive to disturbance such as live fire training drills. As the planet warms and Guam gets hotter, I also implore the DoD to create a plan for fires that could occur in the area during dry season due to the nature of the exercises they propose to perform. I would advise creating a strategy to contain wildfires to mitigate the effects it could have on the nearby limestone forests, endemic birds, endemic and endangered trees such as *Serianthes nelsonii*, and the local cycads and other wildlife which are found in abundance in and around the area. I urge the DoD to contribute funding to cultural programs, and additionally to environmental protection agencies and local agencies in Guam such as DAWR as well to mitigate the high cost of losing this environment to live fire training.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact

our cultural sites, even those deemed “insignificant” through DOD’s colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

1. Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community
2. Assemble local experts and advisers on military statements regarding the buildup
3. Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts
4. Establish a plan for increased local oversight of the Northern Guam Lens Aquifer
5. Assess future Department of Defense plans on island
6. Prevent further disruption of ancient sites and preserving historical sites in place
7. Request detailed maps from the military of historic sites on base
8. Assess via local efforts the buildup's economic impacts to the island
9. Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place. I have been advocating on this issue since 2012 and will continue to advocate until the military finds a suitable way to treat my island, my ancestors, and my culture with respect in return for the privilege to use my lands.

Senseramente,

Kalani Reyes

From:
Sent: Thursday, July 2, 2020 11:12 PM
To: CRIWebComment
Subject: [Non-DoD Source] The destruction caused by Project J-017

Greetings,

Though I am not a citizen of the Mariana Islands, I am a US citizen, and I recently became aware of the destruction of three cultural sites as part of Project J-017.

I am horrified by the clearing of these sites. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Why would public review be preemptively ignored for a decision like this? This prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I implore the powers that be to halt any more action at the proposed site location most importantly because it is a desecration of ancient burials. Additionally, it destroys land, endangered species, and natural resources. This is a horrible loss for Guam. The people are losing part of their cultural identity and cannot ever get it back. That is horrible.

How many more of their sacred sites have been cleared for this marine base and other buildup projects? This number needs to be made public. There is no need for another military base on an island that is 212 square miles in area.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of their cultural sites or artifacts. As their community has stated many times prior, these special parts of their identity must be preserved in place.

The way through which the DOD gathers community input is completely unsatisfactory. The PA memo is littered with jargon and vague language which creates more questions than it clarifies. Moreover, the memos leave people guessing about where their historical artifacts, ancient remains, and other culturally significant items are being held. Are they even being preserved at all? Are they being discarded? That is unspeakably sad to consider. PLEASE be clear about this.

I urge the SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. I also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of the cultural sites in any capacity. Please let this be the last time these acts are ever committed.

Sincerely,

Anthony Rinaldi

From:
Sent: Friday, July 3, 2020 8:45 AM
To: CRIWebComment;

Subject: [Non-DoD Source] Project J-017 public comment

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

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Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Vanessa Rios Story

From:
Sent: Wednesday, July 15, 2020 4:33 PM
To: CRIWebComment
Subject: [Non-DoD Source] Project J-017

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Charlene Rivera

From:

Sent:

Thursday, July 16, 2020 1:25 AM

To:

CRIWebComment; governor@guam.gov; patrick.lujan@dpr.guam.gov

Subject:

[Non-DoD Source] Public Comment on Project J-017

Håfa Adai,

Thank you for accepting and reading comments from the community. I implore you to read the comments with an open mind and with empathy. With forward progress, please take the time to consider the ethics of DOD's actions, not just the legality. The island's resources and local ecosystem are at risk and should be considered in a high regard. For more information on ethics regarding archaeological sites, please visit the World Archaeological Congress website, listed below.

<https://worldarch.org/code-of-ethics/>

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Alexis Rojas

From:
Sent: Tuesday, July 7, 2020 6:50 AM
Subject: [Non-DoD Source] Project J-017

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

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Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Veronica, friend

Comment # 128

From:
To: FW: [Non-DoD Source] ee uam eauti ul
Subject: Thursday, July 2, 2020 7:3 : 1 AM
Date:

From: Jose
Sent: Thursday, June 25, 2020 8:57 AM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Keep Guam beautiful!

To Whom It May Concern -

It has come to my attention that there is a military project that is being proposed to span 57 acres of land in Northern Guam for yet another military base on the 212 square mile island. I am not a resident of Guam, but I do want to visit one day and if this gets approved, will I ever get to see the full beauty of Guam? I want you all to remember that Guam is Indigenous Land and the increase of the military is a global health issue. It harms the people of Guam's environment, homes and it threatens their culture.

Please take this moment to reflect and put yourself in the position of the people in Guam. The world has so much beauty and Guam holds beautiful history and sceneries. Do not build another military base, it's enough! How many military bases do you have already on sacred land? Think about that. Enough is enough!

A concerned citizen,
José

From:
Sent: Thursday, July 2, 2020 7:35 AM
To:
Subject: FW: [Non-DoD Source] Concern

From:
Sent: Wednesday, June 24, 2020 5:11 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Concern

To whom it may concern,

Please consider taking these actions relative to the construction of the marine base:

- Assembling local experts and advisers on military statements regarding the buildup
- Providing status reports on the local government's oversight of the buildup, including site visits and mitigation efforts
- Establishing a plan for increased local oversight of the Northern Guam Lens Aquifer
- Assessing future Department of Defense plans on island
- Preventing further disruption of ancient sites and preserving historical sites in place
- Provide detailed maps from the military of historic sites on base
- Assessing the buildup's economic impacts to the island
- Conducting village-wide town halls on such issues

Respectfully,

Concerned citizen

From:
Sent: Thursday, July 16, 2020 12:31 AM
To: CRIWebComment
Subject: [Non-DoD Source] Public Comment - Project J-017

Public Comment: Project J-017

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am saddened and disappointed by the fact that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Stacy Salas

From:
Sent: Sunday, July 12, 2020 2:41 PM
To: CRIWebComment
Subject: [Non-DoD Source] Project J-017

To whom it may concern,

My name is Alicia Samuel and I am writing to you today on behalf of the concerned citizens of Guam from the city of Tustin, California. I have read about the harmful military project J-107 and feel that I must add my voice in condemning this expansion of the marine base. A memo sent out by the military stated that three historic sites, all eligible for the National Register for Historic Places, would not be affected. This was not the case. They were cleared and destroyed, lost forever.

I am horrified by the clearing of these sites, which hold great significance to the culture and identity of the Chamorro people. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information, involvement, comments, and critique that could have made project changes to preserve the sites. This is a horrific injustice against the Chamorro people and we will not stand for it.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of the ancient burial sites and the permanent destruction of land, endangered species, and invaluable resources, including the risk of compromising the Island's main water source.

The 212 square mile island you are occupying does not need another military base. Please reconsider the course you are presently on.

Sincerely,
Alicia Samuel

Comment # 132

From:
To: FW: [Non-DoD Source] In Opposition to the Buildup
Subject: Thursday, July 2, 2020 7:33: AM
Date:

From:

Sent: Tuesday, June 23, 2020 3:16 PM

To: CRIWebComment <criwebcomment@navy.mil>

Subject: [Non-DoD Source] In Opposition to the Buildup

To Whom It May Concern,

I am writing this as a resident of Guam, an Indigenous daughter of the Marianas, and someone who hopes that my children and grandchildren to be able to connect to the ancestors through the land in our islands to say that I am not just vehemently opposed to the buildup, but I am sincerely worried about the environmental, climate, and cultural impact that this buildup will have on Guam and the Marianas as a whole. Guam is 212 square miles. There are 15 islands of the Marianas. None of those places are a "strategic location". Micronesians have been living in the Marianas for thousands of years. We plan to be here for thousands more.

That plan is threatened when things like this buildup, a buildup in addition to the almost 30% of land used for the DOD on Guam alone.

There is no justification for the continued militarization of our islands. There is no justification for consistent cultural genocide. There is no justification for this kind of disrespect.

We can never get back the cultural sites we have lost. But, those of us who love the Marianas, of which of there are so many, know we must continue to protect the sites we have.

We demand you stop.

Si,

C. Mina Aldan San Nicolas

Resident of NCS Dededo, GU

Voting Resident of the District 6, Tinian, NMI

daughter of the Marianas.

From:
Sent: Thursday, July 2, 2020 7:44 AM
To:
Subject: FW: Prutehi yan defendi

From:
Sent: Wednesday, July 1, 2020 12:09 AM
To: CRIWebComment <criwebcomment@navy.mil>;

Subject: [Non-DoD Source] Prutehi yan defendi

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

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Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,
Ciann San Nicolas

From:
Sent: Thursday, July 2, 2020 7:42 AM
To:
Subject: FW: [Non-DoD Source] Testimony in Opposition to Project J-017

From:
Sent: Monday, June 29, 2020 6:05 PM
To: CRIWebComment <criwebcomment@navy.mil>;
Subject: [Non-DoD Source] Testimony in Opposition to Project J-017

Håfa adai,

My name is Ha'ani San Nicolas and I was born and raised in Guåhan. I am outraged and devastated by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I profoundly object to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base in our island that has already sacrificed enough.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Saina ma'åse',

Ha'åni San Nicolas

Comment # 135

From:
To: FW: [Non-DoD Source] UR ISLAND IS SACRED Thursday,
Subject: July 2, 2020 7:2 : AM
Date:

-----Original Message-----

From:
Sent: Wednesday, June 10, 2020 4:30 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] OUR ISLAND IS SACRED

Destroying sacred grounds on our island is disrespectful to our people, our ancestors, and future generations. We don't need more military bases, we don't need more land stolen from our people, and we don't need more colonialism introduced to our island. Enough is enough. Our island will be restored and decolonized within the next 33 years. Believe it. Peace and Love.

From:
To: FW: [Non-DoD Source] ur Island Is Sacred
Subject: Thursday, July 2, 2020 7:37: AM
Date:

-----Original Message-----

From: Jeronico
Sent: Friday, June 26, 2020 5:34 AM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Our Island Is Sacred

Håfa Adai.

My name is Jeronico San Nicolas. I was born on the beautiful island of Guam and moved to the United States of America with my family when I was only 4 years old. I am now 23 years old. I haven't visited home in quite a while, though I know I will return someday soon.

I am familiar with the plans to construct yet another military base and other military structures on our island through the removal of many sacred sites and landmarks that natives and visitors alike hold dearly to heart.

There are many concerns with this.

First, our island is sacred. As indigenous people of the Northern Mariana Islands, the Chamorros take great pride in the land from which we come from, the values we were raised upon, and the history we've come to learn and co-create as time flows on. A part of this stems from our connection to the earth and the sea, our plant allies, our animal allies, our friends and family, and especially the many historical structures that dwell there. Think about anyone who holds immense passion in their souls for the place they've grown to love and call "home." That is exactly how the people of Guam feel about our island.

Second, our island is sacred. The colonization of an island and potentially washing away the centuries of history and culture it holds is a painful experience for its people. As is witnessing the island's direct reflections of history being destroyed and erased from physical existence. In fact, this is more than simply a painful experience. This impacts the identity of the Chamorro people. It can also be viewed as a form of disrespect to the Chamorro people and our ancestors. Think about an art piece you've come across that leaves you in awe. It fills you with wonder and the drive to learn more about its root. You even feel connected to it. Now imagine someone you barely know, or even someone you deeply trust, coming along and ripping apart the art piece before your eyes in order to hang their own piece in that same spot. They tell you something around the lines of "I understand how you feel but I'm doing what I want anyway." That is exactly how the people of Guam feel about our island.

Third, our island is sacred. This "small" situation of more of our sacred grounds seeing destruction for the sake of military operations is rooted in years and years of colonization, oppression, and censorship. The Chamorro people have struggled and fought to keep our culture alive through times when it was viewed as too "other" to be "normal." Thus, we were forced to adopt a new way of living and being, radically change the way we think about ourselves, and even forbidden to speak our own native tongue at a point in time. In simple terms, the ancestors of the Chamorro people experienced times of suffering, confusion, and brainwashing at its finest. The Chamorro people of today are no strangers to the stories and effects of what has happened to our people and our land in times before. It is discouraging to know that the same energies of disharmony and corruption that our ancestors had to live through are still alive and flowing through our island today.

As you can see, the Chamorro people do not take situations like this (destroying our property for a personal agenda) very lightly. This is a serious matter to us and we require the utmost respect for our voices as we express our concerns. I believe there are other ways the situation can be handled that does not involve the destruction of our

sacred sites – our direct connections to our ancestors and other spirits. For example, an island-wide voting ballot can be conducted in which all residents of Guam partake in. This ballot can ask every person if they are for or against the construction of more military property on the island (destruction of our own land), their personal views and opinions on the matter (their valid and unsilenced voices), and any ideas they may have that allow all people of Guam – not just one individual or a small group – to co-create a new future for the island aligned with the values its first people introduced and weaved into its sacred grounds (the people working together as a unified body).

Personally, I am against more construction of anything military-affiliated on our island as it has already met the anger and resistance of our people. Military property alone makes up about a third of our island. I can only imagine more culturally harmful effects of this percentage increasing – especially at the rate it is growing at. If i was in any form of command, I'd quickly see an end to military plans on our island. Unfortunately, I am only one individual. Fortunately, I am not alone in my passion for the decolonization and preservation of Guåhan.

I believe in a future for our island that respects and protects its identity, sacred sites, artifacts, and dwellers. I believe in a future for our island that restores once-lost fragments of its ancient culture and roots. I believe in a future for our island in which all people that grace its soil can feel the love it has for its dwellers in the way it provides for us, nourishes us, nurtures us, protects us, and cherishes us. I believe in a future for our island in which all people that grace its soil mirror that same love back to the island.

I am only one voice. A droplet of expression.

But together, the people of Guåhan are many voices. An ocean of passion, harmony, and love.

Thank you for reading my words. I hope you feel the love encoded in them. May we all venture together towards a harmonious future for Guåhan.

Passionately,
Jeronico San Nicolas

From:
Sent: Wednesday, July 8, 2020 11:45 AM
To: CRIWebComment

Subject: [Non-DoD Source] PROJECT J-017

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We

also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed “insignificant” through DOD’s colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Si yu'os ma'åse,

Sonja Sanchez

A concerned daughter of Guahan

Comment # 138

From:
To: FW: [Non-DoD Source] Guam Buildup Project J-017
Subject: Thursday, July 2, 2020 7:32:07 AM
Date:

From: NorCal BayArea
Sent: Friday, June 19, 2020 8:46 AM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Guam Buildup Project J-017

To whom it may concern,

I strongly oppose the military buildup on Guam.
It seems that the U.S. military has a legacy of disregard, disrespect, & maltreatment not only to the native Chamoru of Guam, & the Marianas Islands, but to our finite resources.

How much more land on a 212 square mile island must you destroy to maintain the front of defense in the western Pacific?

Guam's major source of fresh water, the Northern Limestone Aquifer Lense will be contaminated with the buildup of Firing Ranges.

Endemic species of flora & fauna will be lost forever.

By ignoring the Chamorus pleas to preserve their limited natural resources, you Fail to secure a fruitful, & prosperous future, for the future generations of Chamoru, & Guamanians.

I strongly oppose any further military buildup on my island!

Do the morally correct thing, & invest in the citizens of Guam, do not take away more precious limited resources.

It is bad enough we are outcasted, & ignored, as a non self Governing unincorporated territory.

Sincerely,

Allan P. Santos

Comment # 139

From: FW: [Non-DoD
To: Source]
Subject: Thursday, July 2, 2020 7:2 : AM
Date:

From: April S
Sent: Sunday, June 7, 2020 4:17 AM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source]

Håfa Adai,

As an Indigenous resident of Guåhan, I believe the project under discussion (along with many other DoD projects) undermines everything Guam hopes to achieve in the future concerning sustainability, cultural revitalization, and overall health and wellness of the island and its people.

The lack of respect for historical sites, artifacts, and our ancestral connection to them have been called out many times, yet here we are, again, submitting comments pointing out the obvious.

Although some history textbooks may gloss over the detrimental effects these projects have had on the island, the peoples' collective conscience will never forget.

So, once again, I am submitting yet another "comment" to verbalize my opposition to yet another project in the vast array of military projects that aim to perpetuate U.S. Imperialism in the Pacific.

- A.S.

From:
Sent: Thursday, July 2, 2020 7:42 AM
To:
Subject: FW: [Non-DoD Source] Project J-017

From:
Sent: Monday, June 29, 2020 9:49 PM
To:
Subject: [Non-DoD Source] Project J-017

Buenas yan Håfa Adai,

I am a citizen born, raised, educated and nurtured by Guåhan with deep roots in the Marianas, and I ask that you truly consider the impact of Project J-017 on generations past, present and future.

I understand that you have received this statement and versions of this statement multiple times, but I only hope that every time it is received, it is taken as an amplification of the voice of the people and not mere noise.

With that being said, I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical

artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

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Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

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Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

A. Silvestre

Comment # 141

From:
To: FW: [Non-DoD Source] Project J-017
Subject: Thursday, July 2, 2020 7:3 :1 AM
Date:

From: Paige Spindler-Richardson
Sent: Sunday, June 28, 2020 6:04 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Project J-017

Hello,

I am contacting you regarding Project J-017 in Northern Guam. Knowing the historical status of the land on which this base is being planned, it is apparent that the harm this construction will continue to do is irreversible and that it will forever violate the integrity and well-being of the local community, their landmarks and heritage. Three of the cultural sites already demolished were eligible for the National Register of Historic Places, and Guamanians have been blindsided by the outstanding loss. I urge that you take immediate action to protect this land and the communities that have suffered the damage done.

Thank you for your time,

Sincerely,

Paige Spindler-Richardson

From:
Sent: Wednesday, July 15, 2020 1:29 PM
To: CRIWebComment;

Subject: [Non-DoD Source] public comment for Project J-017

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

Also, I spoke with a USMC representative a couple weeks ago who has since been transferred off-island, and he said that the project was only doing the bare minimum archeological requirements. How can we expect to learn anything about our past? Further, his attitude was very self-interested saying that he was happy that they are building a Marine base on Guam so he could spend more time here. When I spoke of my concerns of the build up, he dismissed them and only spoke of the perspective of the marines and military. So are we to make the marines comfortable while our concerns are ignored? When will our voices truly matter?

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Lauren Swaddell, Sinajana

Comment # 143

From:
To: FW: [Non-DoD Source] Project J-017
Subject: Thursday, July 2, 2020 7:3 : 1 AM
Date:

From:

Sent: Thursday, June 25, 2020 5:57 AM

To: CRIWebComment <criwebcomment@navy.mil>

Subject: [Non-DoD Source] Project J-017

I am writing to you today as an indigenous person of the island of Guam, and an American citizen.

I ask that the United states military stop all attempts to push Project J-017. You will be desecrating the sacred sites of my ancestors, as well as destroying important and rare environments for our animals on Guam. These sites qualify on the National Register of Historic Sites as well as Nature reserves.

Si yu'us ma'ase,

Dee Tajeron

Military Relocation PA Memo Comment Form 2020

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 outlined 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-017 Area Distribution Nodes and Site Telecom Cabling Project - Design and Construction, Navel Base Guam Telecommunications Site (NBGTS) Guam

SUBJECT: J-017 Area Distribution Nodes and Site Telecom Cabling Project - Design and Construction, PA Memo # 1

Date: July 15, 2020

Name: Senator Therese M. Terlaje

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: senatorterlajeguam@gmail.com

and/or

Postal Mail Address: Guam Congress Building, Suite 207, 173 Aspinall Avenue, Hagatña, Guam 96910

COMMENTS:

I object to DoD's determination that the design and construction of the Area Distribution Nodes (ADN) and Site Telecom Cabling at Naval Base Guam Telecommunications Site (NBGTS) "will not affect historic properties since NRHP eligible sites (GHPI Sites 66-08-2303, 66-08-2305, and 66-08-2307) have been mitigated per requirements under PA Memo #2 for J-001B Utilities and Site Improvements Phase I dated December 9, 2014."

Archaeologists have said that GHPI Site 66-08-2303 also known as Magua was a traditional village area and an important site where we have learned information about the past that we didn't know before. The PA Memo states that the site has been "mitigated" meaning that data recovery was performed. "Data recovery" as written in the Programmatic Agreement is the removal of only a sampling of archaeologically relevant material (i.e. *latte*, *lusong*, earth ovens, pottery pieces, etc.) and any remaining artifacts at the site are left to the discretion of the contractor to dispose of. In October 2018, Magua was cleared and bulldozed in contravention of discussions that the military had with the State Historic Preservation Office (SHPO) and the Guam Preservation Trust to preserve part of the area for an interpretive site which would have kept the historic properties in place in its existing landscape. The historic properties and artifacts found throughout Magua all the way to *Litekyan* should be looked at as a broader landscape and a larger CHamoru cultural landscape.

As stated in previous PA Memo comments, a large number of known and unknown historic properties in the larger area (J-001B Utilities and Site Improvements (U&SI) Phase II) should be combined, should be reconsidered as a whole, as the combined individual historic sites are potentially an eligible landscape or similar concept. Carving out spots from a larger area full of historic sites is not consistent with how the land was used. The impact of the proposed projects would cause a lasting effect on the historic properties mentioned in this PA memo and the previous memos, and in effect further erase these historic sites forever from our use, enjoyment, and/or learning potential. Since the clearing and construction has begun in NCTS and Northwest Field, 15 sites containing human remains and 28 sites containing historic artifacts have been inadvertently discovered under the Programmatic Agreement. This is in addition to the known historic sites that have also been impacted.

It was also revealed during a July 13th public hearing by the SHPO, that a significant burial with human remains from the Latte Period was inadvertently uncovered near the Magua site. The burial found was not documented in any of the surveys referenced in the PA memo. I object to the disturbance of this ancient burial site and all others that will be disturbed with this process based on the fact that these are sacred sites where the ancestors of the CHamoru people have been respectfully laid to rest. Furthermore, the denigration, disturbance or appropriation of these sacred sites eliminates any opportunity to attain accurate and new understandings of the past and solidify the ties of the CHamoru people to their heritage and land. These sites are vital to the history, identity, and well-being of the CHamoru people.

There may be many other important findings or historic sites within the surrounding area that should not be removed or built over, for these same reasons. Our historic sites must be preserved in place so that future generations may further solidify their ties to their heritage and land and have the opportunity to interpret the interaction of cultural practices and the environment that helped our ancestors thrive for over 4000 years.

Military Relocation PA Memo Comment Form 2019

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 outlined in red are required to be completed in order for a comment to be posted.

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PROJECT: J-017-II Main and Commercial Gates (Design and Construction), Naval Base Telecommunications Site (NCTS), Guam- PA Memo #1

SUBJECT: J-017-II Main and Commercial Gates (Design and Construction), Naval Telecommunications Site, Guam-PA Memo #1

Date: June 21, 2020

Name: Senator Therese M. Terlaje

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: senatorterlajeguam@gmail.com

and/or

Postal Mail Address: Guam Congress Building, Suite 207, 173 Aspinall Avenue, Hagatña, Guam 96910

COMMENTS:

I object to DoD's determination that the design and construction of the Main Gate and a Commercial/Tactical Vehicle Gates at Naval Base Guam Telecommunications Site (NBGTS) "will have no adverse effect to historic properties within the J-017-II Area of Potential Effect (APE) since the eligible site (GHPI Site 66-08-2305) has been mitigated per requirements under PA Memo #2 for J-001B Utilities and Site Improvements Phase I dated December 9, 2014."

According to PA MEMO #1 (J-017-II Main and Commercial Gates (Design and Construction), Naval Base Telecommunications Site (NCTS)), one site that is eligible for listing in the National Register for Historic Places (NRHP) also referred to as the Seabee encampment, is being affected by this project. The PA MEMO also mentioned that evidence from the Second American Territorial Period, First American Territorial Period Spanish-style features, and Latte Period artifacts were found at the site. While the PA MEMO states this site has already been subject to data recovery and removal of historic artifact under PA Memo #2 for J-001B Phase 1 in December 2014, it does not mean the historic properties are not continuously being affected, especially if the historic properties represent contiguous sites, settlement areas, ancient villages and/or NRHP eligible sites. Physically removing the artifacts that help classify these sites as historic properties (through data recovery) does not wipe away the sites' historic value or cultural significance. These historic properties and sites are significant because they were areas chosen for specific, important activities in our history.

Additionally, the map excerpts do not show exactly where GHPI Site 66-08-2305 is located and impacted by the project listed. Based on the maps provided, the J-017 project is in close proximity to projects referenced in a previous PA memo (J-031, J-033, and P-459 - Bachelor Enlisted Quarters; P-311 – Central Fuel Station; and P-804) which I provided comments on as well. Those projects significantly impacted 7 historic properties including the Magua settlement area.

As stated in a previous PA Memo comment, the large amount of historic properties in the larger area (J-001B Utilities and Site Improvements (U&SI) Phase II) should be combined, should be reconsidered as a whole, as the combined individual historic sites are potentially an eligible landscape or similar concept. Carving out spots from a larger area full of historic sites is not consistent with how the land was used. The impact of the proposed projects would cause a lasting effect on the historic properties mentioned in this PA memo and the previous one, and in effect further erase these historic sites forever from our use, enjoyment, and/or learning potential.

From:

Sent:

Thursday, July 16, 2020 8:45 AM

Subject:

[Non-DoD Source] Comment on Project J-017

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

- Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community
- Assemble local experts and advisers on military statements regarding the buildup
- Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts
- Establish a plan for increased local oversight of the Northern Guam Lens Aquifer
- Assess future Department of Defense plans on island
- Prevent further disruption of ancient sites and preserving historical sites in place
- Request detailed maps from the military of historic sites on base
- Assess via local efforts the buildup's economic impacts to the island
- Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Erin Thomas

Comment # 147

From:
To: [CRIWe Comment](#)
Subject: [Non-DoD Source] PRUTEHI MARI NAS
Date: Thursday, July 2, 2020 1:30:2 PM

To whom it may concern,

I am a local resident of the Island of Guam in opposition of your planned military build up upon sacred lands. Unbeknownst to you, land on Guam does not just equal merely soil nor a piece of the Earth; it holds a much more deeper and significant meaning than that. In regards to this, I do not condone the allowance of military build up of over 57 acres of sacred land. The Northern Lens Aquifer is at risk, our Flora and Fauna are at risk, our Ocean and our Land are at risk. I will not keep my voice down and highly encourage the military to further cease any plans of build up on Ancient Village grounds. Please leave the land alone, for we cherish it more than you do. Good day.

From:
To: FW: [Non-DoD Source] Destruction of Indigenous Land of Northern Guam
Subject: Thursday, July 2, 2020 7:30:2 AM
Date:

-----Original Message-----

From: JVallejo
Sent: Thursday, June 18, 2020 8:03 PM
To: CRIWebComment <criwebcomment@navy.mil>
Subject: [Non-DoD Source] Destruction of Indigenous Land of Northern Guam

To whom it may concern,

It has been brought to my attention that a military base is in the process of development in Northern Guam. Additionally, it has been brought to my attention that Project J-017 will destroy the lands of ancient, indigenous sites of Northern Guam that are sacred to individuals belonging to or having ancestral ties to these areas. The project you plan on imposing is going to demolish these sites, thereby removing an essential and important aspect of these people's history. The indigenous people in our country have been continuously neglected, abused, and mistreated. Their lands, which we stole from them originally, have been imposed upon time and time again by our government, chipping away at the little they have left. Don't be a part of the problem and further scar and taint our indigenous people's history. If this project is essential, despite having several bases on the tiny island of Guam, please consider moving it to a different site that won't disrupt the little, sacred land that they have left. It is unjust and unwarranted. Thank you,
J. Vallejo

From:
Sent: Friday, July 3, 2020 6:34 PM
To: CRIWebComment
Subject: [Non-DoD Source] PRUTEHI LITEKYAN

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

While the PA memo cited the three sites as eligible for the National Register of Historic Places under criterion D, I argue that the cleared sites should also be considered as eligible under Criterion A, B and C. They should have never been cleared, and I OBJECT to any future clearings of our cultural sites or artifacts. As our community has stated many times prior, these special parts of our identity must be preserved in place. We do not need another military base on our 212 square mile island.

I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

Establish a local committee to study impacts and necessity of the live-fire training range complex, and to report the findings to the community

Assemble local experts and advisers on military statements regarding the buildup

Provide status reports on the local government's oversight of the buildup, including site visits and mitigation efforts

Establish a plan for increased local oversight of the Northern Guam Lens Aquifer

Assess future Department of Defense plans on island

Prevent further disruption of ancient sites and preserving historical sites in place

Request detailed maps from the military of historic sites on base

Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Senseramente,

Elisha Vasques

From:
Sent: Saturday, July 4, 2020 2:26 AM
To: CRIWebComment
Subject: [Non-DoD Source] Citizen Statement: Project J-017

Buenas yan Håfa Adai,

My name is Kamerin Villagomez, and I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

I object to further action at the site for the proposed marine base due to inadequate background research, the desecration of our ancient burials and the permanent destruction of our land, endangered species, and invaluable resources, including the risk of compromising our island's main water source.

Losing three cultural sites is a grave loss for Guåhan. How many more of our sacred sites have been cleared for this marine base and other buildup projects? Our community deserves to know this number and the destruction must stop. Mitigation through "data recovery" is not an appropriate measure considering we are losing sites that are irreplaceable and culturally invaluable. Any adverse impacts on our cultural resources is a part of our identity lost that we cannot get back.

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I am highly dissatisfied with the PA Memo process the DOD uses to gather community input. The misleading language and jargon ultimately leave us with more questions than answers. More often than not, these memos lack complete information and detailed mitigation plans. Moreover, the memos leave us guessing the whereabouts of our historical artifacts, remains of our ancient ones and remnants of our ancient past. Where is the military putting our artifacts that have been cleared? Does it discard those artifacts that it does not deem "significant"? Our community deserves to know these answers.

I urge our SHPO Patrick Lujan to use his power to utilize non-invasive documentation techniques for any and all historic property documentation. Such documentation is possible without putting a shovel in the ground. We also urge SHPO Lujan to invoke Stipulation 13 for any and all future buildup projects that will adversely impact our cultural sites, even those deemed "insignificant" through DOD's colonial lens. In addition, local leaders and the DOD must institute the following measures relative to buildup projects. Failure to do so will only add to the public outcry.

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Senseramente,

Kamerin Villagomez

--

Kamerin Villagomez

She/Her

From:
Sent: Tuesday, July 14, 2020 6:44 AM
To: CRIWebComment;

Subject: [Non-DoD Source] Save Ritidian!

Buenas yan Håfa Adai,

I am a concerned citizen deeply disturbed by the clearing of our three cultural sites as part of Project J-017 that were eligible for the National Register of Historic Places. I am horrified by the clearing of these sites, which hold great significance to my culture and identity. I am furious that the period for public comments comes after these highly significant sites have already been cleared. Denying an opportunity for public review prevented meaningful public information sharing, involvement, comments and critique that could have made project changes to preserve the site.

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Senseramente,

Darlene Westbrook

From:
Sent: Thursday, July 2, 2020 9:05 PM
To: CRIWebComment
Subject: [Non-DoD Source] Project J-017

Buenas yan Håfa Adai,

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Assess via local efforts the buildup's economic impacts to the island

Conduct village-wide town halls on the issue

Again, I reiterate my objection to the clearing of our cultural sites in any capacity. Due to the lack of detail and transparency surrounding buildup projects in general, it is my opinion that the DOD has failed in its commitment to uphold the "One Guam" approach and abide by its pledge to be culturally sensitive. Time and time again, our community has urged that these invaluable parts of our history be preserved in place.

Regards,

Camille Zapata

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Camille Zapata

June 15, 2021

**Response to Comments Received for PA Memo #1:
J-017-I&III (Area Distribution Nodes and Site Telecom Cabling)
and
J-017-II (Main and Commercial Gates)**

The Cultural Resources Information website was established in accordance with 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) for collecting public input regarding the identification and evaluation of historic properties, and to comment on DoD's identification and evaluation efforts and findings. The website is not intended to receive other types of concerns outside of the original intent and scope of the PA and of the National Historic Preservation Act. Responses to comments received for J-017 - I & III (Area Distribution Nodes and Site Telecom Cabling) and J-017 - II (Main and Commercial Gates) are presented by relevant topics below.

As mentioned in the PA memo, the intent of PA Memo #1 for J-017 - I & III (Area Distribution Nodes and Site Telecom Cabling) and J-017 - II (Main and Commercial Gates) is as a means for interested members of the public to provide comments on the identification and evaluation of historic properties within the Area of Potential Effect. The DoD has read and taken into account all relevant comments received within 45 days of the date of the delivery of this PA memo to the SHPO and public notification via the CRI website.

Identification Efforts

The PA memo process is one avenue in which information was gathered to identify historic properties, and is not the only process in which historic properties were identified. During planning stages of the overall project, the Department of Defense (DoD) first conducted a data gap analysis to determine the need for supplemental identification and evaluation surveys and then executed those efforts. The Area of Potential Effect (APE) for these two projects have been subject to one or more of the historic property identification efforts listed in 36 CFR §800.4(b)(1), which may include background research, consultation, oral history interviews, sample field investigation and field survey. The specific types of research and identification efforts for each project is contained in the PA memos as indicated by the reference cited, as well as previous planning documents. The historic property identification efforts comprised of soliciting comments from experts and as well other interested parties, including the public's input at various stages of the overall planning process.

Evaluation Efforts

The DoD applied the National Register criteria (36 CFR § 63) to evaluate the eligibility of properties for inclusion in the National Register within the APE that may be directly or indirectly affected by the undertaking. The eligibility of cultural resources as historic properties to the National Register of Historic Places was made in conjunction with local experts from the Guam State Historic Preservation Officer (SHPO), as well as information from other stakeholders including consulting parties and interested stakeholders.

Assessment of Effects

The assessment of effects may prompt project modifications or the application of other conditions to avoid adverse effects to historic properties. The Section 106 process and the 2011 PA requires the DoD to make a reasonable and good faith effort to take into account the effects of their undertakings on historic properties with the participation of the local SHPO and other consulting and interested parties. Pertinent information and comments submitted during the PA Memo process help inform project planners. Furthermore, whenever possible, this information is combined with other existing information previously gathered to assess the effects of the project on historic properties within the APE. The outcome of this combined data gathering efforts can contribute to the DoD incorporating the information into the re-designs, if necessary. The determination of effect is therefore made in a manner that is thorough and thoughtful.

Mitigation

As stipulated in the 2011 PA, standard mitigation for a historic property that is archaeological in nature, is data recovery excavations. This does not preclude avoidance and minimization of adverse effects earlier in the project planning stages. Furthermore, mitigation measures for adverse effects on historic properties must adhere to the SOI Standards and Guidelines of for the Treatment of Historic Properties and was made in combination with historic preservation experts both within and outside of the DoD. As these two PA memos resulted in a determination of no effect to existing historic properties, the mitigation was deemed appropriate to the actions.

Discoveries

Stipulation XI of the 2011 PA, provides for a process in the event discoveries of potential historic properties are made. Construction is paused at the location of the discovery and the SHPO is notified with a plan of action within 48 hours. (Read the full 2011 PA here). In accordance with Stipulation VI.F. of the PA, the DoD has retained a full-time Archaeologist to provide site checks, oversee coordination and execution of the archaeological mitigation measures in the 2011 PA and to provide quality control. This individual is on-staff at Marine Corps Activity Guam, Public Works Department, and is designated to respond to and report any discoveries to the Signatories, Invited Signatories, and Concurring Parties per Stipulation XII of the PA.

Information Included in Programmatic Agreement Memoranda (PA Memos)

As a federal agency the Navy is required to uphold historic preservation laws, including confidentiality provisions that protect information on the nature and location of historic properties, including archaeological resources. To ensure confidentiality provisions are adhered to, historic property information in the public PA Memos is presented in general terms. The Guam SHPO has a consultative role in the Section 106 process that reflects the interests of the citizens of Guam, and SHPO staff provide expertise on historic properties during consultation. SHPO versions do include detailed information regarding the nature and location of properties. In accordance with federal regulations, the SHPO is responsible for working with the DoD in taking into consideration historic properties at all level of planning and development.

Cultural Resources Information (CRI) Website

While confidentiality requirements prevents from publicly disclosing the exact nature and location of archaeological resources and historic properties, the CRI website makes other information available to the public. The website requests public input regarding the identification and evaluation of historic properties within project-specific APEs for direct and indirect effects. Additionally, the public has the opportunity to comment regarding DoD's identification and evaluation efforts and findings. Comments received are also displayed on the CRI website.