

Comments Received by June 2, 2014 for J-017 U&SI Mass Grub and Grade, Phase 2 (GoJ), PA Memo #1

Name	Comment/Question
De Oro, M.	Locally operating CRMs should get the contracts for any future surveying and monitoring work for the build up. Lead archeologists and investigators working on any Navy projects in here and in the Northern Marianas should have ample experience and back ground in the region. Additionally there should be a preference for locally trained archaeological field technicians.
De Oro, M.	Although the information on the comment sheet is vague, there were many issues and questions that were raised and should be addressed prior to any action in the APE. Submitting comments on the web email form was difficult as you could not copy and paste comments.
De Oro, M.	Who did the oral testimonies and interviews in regards to the traditional cultural properties? There is no indication of the evaluations on the list of sources found at the end of the memo. Who were the participants in the oral histories? Will these testimonies ever be available to the public?
De Oro, M.	Accessibility of the memo was limited and there is little to no public outreach to comment on this PA memo. The website itself was hard to find and difficult to navigate. The url name of the website was not easily recognizable, nor was the memo name. What does grubbing even mean? The information was vague and the jargon is heavily and not easily decipherable for even educated members of the local Guam community. In general the community of Guam is fatigued in having to respond to military plans in this manner. No meaningful dialogue take place, for many residents feel that all plans are set in stone and this protocols are just in place and comments make little to no difference in the final course of action.
De Oro, M.	Were the plants identified and surveyed in all 176 acres of the APE, or just around the two identified cultural sites? What were the credentials of those who identified culturally significant plants or medicinal herbs? Many rare medicinal herbs are found in the northern limestone forests and jungles, which are diminishing around Guam due to development both military and commercial. There are hundreds of herbs of cultural value that even trained botanist will not have knowledge to. It is of utmost importance that traditional healers identify the resources before any work begins. There are organizations such as Håya Foundation and Åmot Taotao Tåno' that work with native traditional healers and can help identify individuals to conduct survey work prior to grubbing, clearing and grading work.
De Oro, M.	With all the development slated for the next few years with military build up it is critical the federal government assists the local government in addressing staffing shortages with over site agencies. All properties of cultural and historical significance are managed with the Department of Parks and Recreation. HPO or the Historic Preservation office is understaffed and personnel resources are strained. Adequate funding should be identified so that the agency can do its due diligence to protect all valuable cultural and historic resources.

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De Oro, M.	Navy properties such as NCTAMs or NBGTS are used in identifying the project areas. Use of the local names needs to also be required. These lands have been important to the people of Guam for thousands of years and omitting the cultural place names is insensitive and wrong.
De Oro, M.	Under an enormous amount of political pressure, in 2011 the PA was signed with hesitation from Guam SHPO. The PA was not written to include the changes made for the new DSEIS. Will a new PA be written or will it just be amended to fit the changes? Concurring parties on the original PA did not sign off in the 2011. What was the reasoning that these parties were unwilling to sign off on the PA? What will the process be for new interested parties to join on as concurring parties? When will the access plan for cultural practitioners such as hunters, fishermen, weavers, carvers and traditional healers be released? Please include access for people who are apprenticing under the practitioners so that the knowledge can be perpetuated.
De Oro, M.	There were two sites that were deemed eligible for nomination to the National and Local register of historical sites. These sites should be recognized and undergo the proper evaluation prior to any disturbance of the areas.
Guam SHPO (RC2014-0625)	<i>[Original statement has been redacted due to confidentiality requirements under the Archaeological Resources Protection and National Historic Preservation Acts]</i> , shows areas of high and medium potential also within the APE. The medium potential area was surveyed in 2009 by Athens, however, the conclusions were not reported in the Welch 2010 report. The <i>[original statement has been redacted due to confidentiality requirements under the Archaeological Resources Protection and National Historic Preservation Acts]</i> indicates that even heavily disturbed areas may contain <i>[original statement has been redacted due to confidentiality requirements under the Archaeological Resources Protection and National Historic Preservation Acts]</i> . Athens reports that no subsurface testing was conducted in the survey area, even though Welch recommended subsurface testing and or monitoring of the area based on the 2007 reporting.
Guam SHPO (RC2014-0625)	In future submittals, kindly provide the area of potential effect (APE) overlay over any existing survey with historic properties to better aid us in evaluating the undertaking. It will help us also, if maps presented in the PA Memo are the same scale.
Guam SHPO (RC2014-0625)	In overlaying the current APE on the NCTS Finegayan 2007 survey map it shows that GHPI <i>[original statement has been redacted due to confidentiality requirements under the Archaeological Resources Protection and National Historic Preservation Acts]</i> either lies within or in close proximity to the APE. The location of this site needs to be verified in order to mitigate or avoid. Also, please indicate the site names for site numbers provided.
Pangelinan, B.	Does the composition of the archaeological team conducting surveys include the participation of native inhabitant(s) of Guam? If not, what efforts will be made to ensure that our subject matter experts on Guam are included at all levels of participation in this process?
Pangelinan, B.	Excluding removal, what efforts will be made to protect and preserve the culturally important natural resources such as the nunu, da'ok, dukduk, and ifit trees as well as other medicinal plants in the area?

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Pangelinan, B.	How does the Naval Facilities Engineering Command (NAVFAC) Pacific plan to handle the significant historical artifacts found? Will they be removed and catalogued, stored for eventual transfer to the government of Guam?
Pangelinan, B.	The Haputo Beach Site is listed on the Guam and National Register of Historic Places (NRHP). Does not the NRHP designation serve to protect such sites from any Department of Defense Undertaking? How does the proposed DoD Undertaking affect those sites listed on the NRHP?
Pangelinan, B.	Visually, the maps provided are vague. More information such as beach/coastal areas, landmarks and roadways should be identified to ensure that the public is able to read and understand the sites involved.
Pangelinan, B.	Better effort to inform the public of these PA Memos is greatly needed to ensure receipt of public comment. The only notice released that the public may have access to was on the Pacific News Center website dated May 31, 2014. For comments due on June 2, 2014, this effort is inadequate and more outreach must be done to ensure that the people of Guam are able to participate in such a process. NAVFAC Pacific should consider purchasing airtime on local radio stations or print advertisements in local newspapers. It is absolutely clear the public notice is inadequate under the current system and must be modified.
Pangelinan, B.	Appendix E of the PA shows that GHPI Site 66-08-0007 is a resource area that will be potentially indirectly affected. What does this mean, and how is the public made aware of what exactly is at risk in terms of historical and cultural resources? What details determine whether an area is "potentially indirectly affected"?
Pangelinan, B.	Final archaeological survey was conducted in 2007 (seven years ago) for this Project. What are the requirements for updating for a more current archaeological survey/report to ensure that public is provided best updated information? These properties should be resurveyed given the new areas introduced and the decrease in the size of the area of potential effect. Most current survey/report should be accessible to the public. Additionally, we do not have access the surveys/reports listed in the PA Memo. Do these reports state whether or not burial sites will be affected in the project area? It is critical that these sites remain untouched and undisturbed and every effort be exercised to ensure protection and preservation of the sacred ancient remains of our Chamorro people. If you cannot mitigate, then they should be avoided.
Pangelinan, B.	The previous PA Memo for this project included adverse impacts to Haputo Beach. Does the amended project site affected include the Haputo Beach area and the numerous cultural resources located there? If so, what are the anticipated adverse effects to the area? Will public access to this historical, cultural site be impacted?

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Pangelinan, B.	The website and these documents should be made public user-friendly. For example, the Historic Property number listing in the PA Memo #1 (J-017) states that two sites will be directly affected, but does not specify what site number or project is being referenced under the Public Education and Interpretation Series Booklets on the Cultural Resources Information website. Further, if one does not have access to Appendix E of the Programmatic Agreement, then it is not possible to see which cultural resources are directly affected, such as Guam Historic Properties Information (GHPI) Sites [<i>original statement has been redacted due to confidentiality requirements under the Archaeological Resources Protection and National Historic Preservation Acts</i>]. What efforts moving forward will you make to ensure that this process is made more user-friendly for the general public to provide comment?
Perez, S.	Locally operating CRMs should get the contracts for any future surveying and monitoring work for the build up. Lead archeologists and investigators working on any Navy projects in here and in the Northern Marianas should have ample experience and back ground in the region. Additionally there should be a preference for locally trained archaeological field technicians.
Perez, S.	Accessibility of the memo was limited and there is little to no public outreach to comment on this PA memo. The website itself was hard to find and difficult to navigate. The url name of the website was not easily recognizable, nor was the memo name. What does grubbing even mean? The information was vague and the jargon is heavily and not easily decipherable for even educated members of the local Guam community. In general the community of Guam is fatigued in having to respond to military plans in this manner. No meaningful dialogue take place, for many residents feel that all plans are set in stone and this protocols are just in place and comments make little to no difference in the final course of action.
Perez, S.	Who did the oral testimonies and interviews in regards to the traditional cultural properties? There is no indication of the evaluations on the list of sources found at the end of the memo. Who were the participants in the oral histories? Will these testimonies ever be available to the public?
Perez, S.	Were the plants identified and surveyed in all 176 acres of the APE, or just around the two identified cultural sites? What were the credentials of those who identified culturally significant plants or medicinal herbs? Many rare medicinal herbs are found in the northern limestone forests and jungles, which are diminishing around Guam due to development both military and commercial. There are hundreds of herbs of cultural value that even trained botanist will not have knowledge to. It is of utmost importance that traditional healers identify the resources before any work begins. There are organizations such as Håya Foundation and Åmot Taotao Tåno' that work with native traditional healers and can help identify individuals to conduct survey work prior to grubbing, clearing and grading work.

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Perez, S.	Under an enormous amount of political pressure, in 2011 the PA was sign with hesitation from Guam SHPO. The PA was not written to include the changes made for the new DSEIS. Will a new PA be written or will it just be amended to fit the changes? Concurring parties on the original PA did not sign off in the 2011. What was the reasoning that these parties were unwilling to sign off on the PA? What will the process be for new interested parties to join on as concurring parties? When will the access plan for cultural practioners such as hunters, fishermen, weavers, carvers and traditional healers be released? Please include access for people who are apprenticing under the practioners so that the knowledge can be perpetuated.
Perez, S.	There were two sites that were deemed eligible for nomination to the National and Local register of historical sites. These sites should be recognized and undergo the proper evaluation prior to any disturbance of the areas.
Won Pat, J.	I must object to the proposed action of “clearing, grubbing, grading, earthwork such as digging, trenching, drilling, boring and/or cut and fill), processing and stockpiling of green waste, erosion and sediment control ... on the limestone plateau above the western cliffs of northern Guam. The area of potential effect has “long-term preservation value, such as traditional cultural and religious importance,” as listed in item three of the Advisory Council on Historic Preservation’s guidelines in the Programmatic Agreement. Several native plant species used in the homeopathic preparations of traditional healers are endemic to the area, as is a moss type that is used in religious rites. Additionally, the wood from trees in the area has historically been and continues to be used for traditional seafaring vessel construction. The historic and cultural value of the area, along with the value of the area in current cultural preservation efforts, should preclude the destruction of the property. The losses that would be suffered are immitigable.

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Won Pat, J.	<p>"In addition to the archaeological and architectural surveys and evaluations, DOD has completed extensive archival research and oral history studies and interviews to identify traditional cultural properties, places, sacred sites, and culturally important natural resources such as the nunu, da'ok, dukduk, and ifit trees, and medicinal plants." I am curious as to the actual extent of the research and studies, for the following reasons: The ninth bullet point in Appendix F of the Programmatic Agreement states, "Human remains and funerary objects deserve respect and should be treated appropriately. The presence of human remains in an archeological site usually gives the site an added importance as a burial site or cemetery, and the values associated with burial sites need to be fully considered in the consultation process." I do not think that the Department of the Navy has adhered to this guideline, as human remains were noted as being present in the preferred alternative site (Draft SEIS, Chapter 4, 4.1.10 Cultural Resources, page 4-82) and yet no mitigation measures, data or any information was available anywhere in the document regarding the treatment of these remains or the area in which they are known to be. Item two of the ACHP's guidelines for "adversely affected" sites states, "The archeological site should not contain or be likely to contain human remains, associated or unassociated funerary objects, sacred objects, or items of cultural patrimony as those terms are defined by the Native American Graves Protection and Repatriation Act." The DON will be in violation of item two of the ACHP's guidelines for "adversely affected" sites if it proceeds with the preferred action, as the Draft SEIS states on page 4-82 that there are human remains at the site.</p>
Won Pat, J.	<p>I am curious as to how it was determined that the DON should proceed with the preferred alternative, measured against the guideline in bullet point five of PA Appendix F, "Given the non-renewable nature of archeological sites, it follows that if an archeological site can be practically preserved in place for future study or other use, it usually should be (although there are exceptions)." What variables in the U&SI Mass Grub and Grade project led to these sites becoming the exception? I understand the guideline broadens to include, "simple avoidance of a site is not the same as preservation;" however, considering Guam's small size and the number of archeological sites and cultural and natural resources already destroyed, I am compelled to recommend avoidance. The island really cannot afford to lose any more of its history, ecology and biodiversity.</p>