

Comments Received on PA Memo #2
J-755 Urban Combat Training Project – Construction & Operation (Andersen South)

Comment Number	Comment Type	Name or UserID	Comment*
1	Letter	Guam SHPO	<p>The subject undertaking will have an adverse effects on historic properties for both the construction and the operations. As previously stated some sites were not issued Guam Historic Property Inventory (GHPI) numbers or concurred upon eligibility due to the lack of information presented to our office concerning the sites. In the August 24, 2017 edition of The Guam Daily Post part of the area of potential effect (APE) for the J-755 project is not under the ownership of the DoN. Approximately 80 acres was conveyed to the Guam Department of Education (GDOE) by the U.S. Department of Education (USDOE) in 1992. The article states the USDOE is trying to get the property returned to them from GDOE due to non-use of the land and that the DoN has interest in the land. Therefore, we do not see where the DoN has jurisdiction over this property at this time. Therefore, NAVFAC should not be submitting a PA Memo on lands that are not under their control, until such time as they have required jurisdiction over the property. Once the USDOE has reacquired the property from GDOE, then a decision on who will be the lead agency for the Section 106 on the property can be made. However, until this happens the approximately 80 acres needs to be removed from the J-755 PA Memo APE.</p>
2	Letter	Guam SHPO	<p>Our previous comments on the design phase of the project still stand. The sites to be impacted during the design phase were only identified and not evaluated, and proper background research on the area was not conducted. The initial PA Memo and the revised PA Memo indicated an area of potential effect (APE) containing 580 acres. The APE for "Operations" portions of Andersen South J-755 has added an addition I, 366 acres, consuming the entirety of Andersen South. We believe that the previous surveys did not adequately present a good faith effort in identifying historic properties as noted in the text below.</p>
3	Letter	Guam SHPO	<p>The PA memo mentions one "notable exception to this approach is Site 66-04-2326, a historic post-WWII concrete structure that was determined to be outside of the new obstacle course for vehicle training activities. It has a low likelihood of being affected by foot maneuver activity given its fixed, ridged nature and therefore will not be data recovered."</p> <p>This explanation lacks the significance assessment and recommendations in accordance with the Secretary of Interior's Standards according to NAVFAC own investigation (Final Report, Archaeological Surveys and Cultural Resources Studies on the Island of Guam in Support of the Joint Guam Build-Up Environmental Impact Statement, Volume I: Narrative). Operations, boots on the ground will seek shelter where ever they can putting GHPI site 66-04-2326 and any other structures in a direct adverse effect criteria when undertaking operation maneuvers activities. Therefore a HABS should be conducted on this building to mitigate any adverse effects to this historic property that is "solely under military jurisdiction" as noted in the PA Memo 2. The site assessment believed GHPI site 66-04-2326 was significant under criteria) A and C.</p>
4	Letter	Guam SHPO	<p>Architectural Historian who examined some the infrastructure remains at the site, recommended further research before a final determination of eligibility to the NRHP is made" (p322), on two areas of infrastructure. However, later in the document these infrastructure remains are labeled not eligible without any further research being conducted. We feel that these areas require more research to fulfill the initial assessment by the Architectural Historian rather than eligibility noted in table 16.3 on page 357.</p> <p>The recommendations of the two infrastructure areas reported by International Archaeological Research Institute, Inc. (IARII) are Marbo Installation Infrastructure, IARII Map No. 1066, and the 22nd General Hospital Infrastructure, IARII Map No. 1051. These infrastructures were recommended for an architectural historian to investigate the archival and oral histories to clear up the ambiguities regarding the history of the sites and to better define the boundaries of the Army Hospital. These sites can be found in Figure 15.3 of the cited report and the recommendations are found on page 324. Since, these site will be impacted by the undertaking, we agree with the recommendations an architectural historian conduct further archival and oral histories on these sites to clear up these ambiguities and boundaries problems. The Guam Historic Properties Inventory (GHPI) number 66-04-2911 has been assigned to Marbo Installation Infrastructure, IARII Map No. 1066 and GHPI number 66-04-2912 has been assigned to 22"d General Hospital Infrastructure, IARII Map No. 1051.</p>

5	Letter	Guam SHPO	Other sites within the Andersen South were regarded as eligible under the National Register criteria, IARII Map No. 977 (artifact scatter) was noted as being eligible under criteria D and needs further relocating and evaluation. The Guam Historic Properties Inventory number 66-04- 2910 has been assigned to IARII Map No. 977, the place name of the site is called Mogfog I.
6	Letter	Guam SHPO	Site numbers were not assigned to temporary sites AS-T-2008-01 and AS-T-2008-04 because we believed the methodology was flawed in identifying the sites testing was not conducted to see if they were connected. A pedestrian survey in an area that was previously cleared is the flawed methodology as sites may have been buried under soil similar to sites found at the Live Fire Training Range Complex that were buried due to landscaping. Therefore, we feel subsurface testing is necessary to identify buried horizons between these two sites and throughout these sites. Once these areas have been fully identified please contact our office where we can assign GHPI numbers to these sites.
7	Letter	Guam SHPO	<p>In reviewing the original build-up survey, the historic background in identifying the historic lancho is lacking shown both on the 1913-14 and the 1944 maps. These lanchos do not appear on the 1954 map, however, the lancho area was not developed during the 1954 military occupation of the area. We have good reason to believe that one of these farms (see attachment) was occupied by Senator Angle Anthony Leon Guerrero Santos III when he was arrested by federal authorities for occupying what he believed was the illegal taking of his grandfather's lancho. Senator Angle Santos III was a believer in decolonization and credited for exposing the DoDs illegal disposing of toxic chemicals here on Guam. He is a prominent figure in Guam and to our national identity. We believe this property needs to be clearly identified and protected in place for future generations based on stance Senator Santos made with regard to his homeland, the taking of the land, and under United Nations (UN) Resolution 1514 on December 14, 1960 and the "U.N. Resolutions of February 24, 1999", which "mandated the immediate return of ancestral lands from the federal government without any strings attached or conditions imposed." (http://www.dailyrepublican.com/guam_angel-santos.html). This farm and Senator Santos believed rights stands for the very freedom which our nation is built upon.</p> <p>The identification and protection of this lancho from any and all DoD activities, stretches beyond our local and national history into the global reparations that indigenou people have suffered and continue to suffer throughout the world. These lanchos were most likely date back to if not beyond the Spanish period. The historic maps clearly show these historic properties existed for over 30 years before WWII on the landscape. The statement in the IARII report that "post WWII land use involved clearing and bulldozing that likely displaced or destroyed any earlier historical or archaeological remains within the footprint of the base infrastructure" (p314) does not meet a reasonable and good faith effort as identification standard in Section 106 Review. The Advisory Council on Historic Preservation states the federal agency to do the following "Determine and document the APE in order to define where the agency will look for historic properties that may be directly or indirectly affected by the undertaking" and provide sample field investigations.</p>
8	Letter	Guam SHPO	In reviewing the 1944 artillery maps and research done on the battle for Guam, the research shows that four Japanese soldiers were killed and most likely buried at T-2, and 44 Japanese soldiers were killed and probably buried near the northwest corner of GHPI number 66-04-2911. Although not all soldiers were buried usually large numbers were buried. This WWII battlefield information was never disclosed in document. This area will need to be reassessed regarding this information and perhaps a GHPI number given to this battle area.