This PA Memo is required by Stipulation IV.E.2.a. of the PA as a means for interested members of the public to provide comments on the identification and evaluation of historic properties. Stipulation IV.E.1.b. of the PA requires the DoD to take into account 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.
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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. As such, results of identification and evaluation efforts in the vicinity of, and including the P-103 revised APE can be found in the following original studies of cultural and/or historic resources (see Figure 2):


Athens, J.S.

Church, M., J. Hokanson, J. Gallison, and M. Jennings

DeFant, D. and R. Guerrero
2011 *Archaeological Survey of Seven Parcels within the Munitions Storage Area, Andersen Air Force Base, Island of Guam*. Prepared by PHRI, Hilo, HI.

Dixon, B. and S. Walker

Dixon, B., S. Walker, and R. Schaefer
2011b *Final Report Cultural Resource Investigations Conducted in the Territory of Guam*
This PA Memo is required by Stipulation IV.E.2.a. of the PA as a means for interested members of the public to provide comments on the identification and evaluation of historic properties. Stipulation IV.E.1.b. of the PA requires the DoD to take into account 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.
National Register of Historic Places (NRHP). The water wells were designed specifically to avoid historic properties, and there are none located within the P-103 revised APE. Four eligible sites (66-08-2305, 66-08-2404, 66-08-2408, and 66-08-2411) and one ineligible site (66-08-2407) are located at the south end of the revised APE.

Following the DoD’s initial submittal of PA Memo #1 on February 24, 2016, the Guam SHPO objected to the DoD’s determination of effect due to a disagreement on the identification of historic properties, and submitted a letter of non-concurrence. Following a consultation meeting between DoD and SHPO staff on April 14, 2016, the Guam SHPO State Archaeologist requested that the DoD archaeologist provide spot monitoring within portions of the project area that occur near archaeological feature concentrations.

The Guam SHPO State Archaeologist toured the project area for the well field on May 18, 2016 with DoD staff and concurred that the project will not affect historic properties. However, following DoD’s submittal of the revised PA Memo #1 dated July 25, 2017, the Guam SHPO submitted written comments (letter dated September 11, 2017), that indicated any understanding that the DoD had following the April 14, 2016 meeting were invalid. Details on the comments and DoD responses appear in the section below.

Although no historic properties are within the revised APE for this project, the July 8, 2018 resolution to objections raised by the SHPO in May 2018 includes archaeological monitoring of initial ground disturbance within the P-103 project area. This provision is in addition to the requirements of Stipulation VI.F. of the PA, to retain a full-time Archaeologist to provide site checks, oversee coordination and execution of the archaeological activities required in the PA, and provide quality control. The DoD archaeologist is also designated to respond to any inadvertent discoveries pursuant to Stipulation XI of the PA.

**COMMENTS RECEIVED ON PA MEMO #1:**

Comments previously received for PA Memo #1 (dated July 25, 2017) are presented below. The comment appears in italics, and the DoD’s response follows each comment. All comments were submitted by the SHPO by letter dated September 11, 2017.

1. *Our office did not agree with the no adverse effect determination presented in the previous PA Memo. The PA Memo states that in an April 14, 2016 meeting, our office agreed with DoD spot monitoring portions of the old APE although, no record of meeting, emails or letters supporting this position accompanied this PA Memo.*
Based on your comment above, we understand that the SHPO objected to the previous PA Memo submitted in 2016. The revised PA Memo #1 dated July 25, 2017 refers to the April 14, 2016 meeting as a follow-on consultation where the State Archaeologist agreed to the finding of no adverse effect and requested spot monitoring in specific areas of the project. However, the DoD recognizes that the SHPO was not present for the entirety of this meeting, and that the results may not be a reflection of the SHPO's position. Additional information on P-103 is being included in responses to comments 2 and 3.

2. Guam Historic Properties Inventory (GHPI) number 66-08-2894, is one of the Caiguat Sites that was never fully defined [sic] in the SEIS as previously stated in our responses. Therefore, the eligibility of the site is unknown according to our records and was going to be avoided in the previous APE. The Caiguat Site boundaries are unrealistic, the figure shows that the pre-Contact Site follows the current DoD fenceline and does not continue beyond the fence. In reviewing the survey and site information on the other side of the fence, the sites found there do not match up to the Caiguat Site. There is clearly a disconnection between the sites recorded and the surveys conducted that have been presented to our office.

To confirm, the current (revised) APE presented in the revised PA Memo does not avoid the ineligible site 66-08-2894. The site consists of pockets of red clay soil and a sparse scatter of Latte Period pottery sherds and tool fragments, surrounded by exposed bedrock outcropping and a higher elevation to the south. The site occupies a northwest/southeast trending ridge. While the eastern boundaries of the site are artificially drawn, it includes a greater area than the site truly occupies. This was accepted as the site boundary. Sites 66-08-2894 and 66-08-2897 are clearly separated which is indicated by an abrupt change in vegetation and exposed bedrock, reflecting a change from midden to red clay subsoil on the north, with sites ending in the south where scattered debris has been deposited off the former Northwest Field Housing road. The AAFB Cultural Resources Manager and the MCAG Archaeologist conducted a field visit on December 4, 2017, and were able to verify that site 66-08-2894 and 66-08-2897 are distinct activity areas, and that site 66-08-2894 does not meet any of the eligibility criteria for listing on the NRHP.

3. The sequential resurvey of the indirect portion of the Live Fire Training Range Complex (LFTRC) found two sites of some magnitude, where the LFTRC survey found no sites in the area. The findings of overlapping survey indicate to us that there are grave inadequacies in the surveys conducted in these areas. Also, buried features and burials have been found on the plateau since the presentation of Record of Decision. It should also be noted that Church et al. did not survey the 140-acre parcel as presented in this PA Memo, rather Church et al. only surveyed the perimeter for the fence line. This is a misrepresentation of the work conducted has been pointed out to NAVFAC PAC before and should not be repeated. Such misrepresentations reflect on the integrity of everything that NAVFAC PAC presents to our
office. Therefore, due to the changes in the AP, new sites found in areas previously surveyed for the build-up, the inconsistencies and inadequacies of the previous surveys in this area, the subsurface finds and burials located on the plateau and the 90-degree angle of (GHP1) Number 66-08-2894, one of the Caiguat sites we require a resurvey for this revised project with systematic subsurface testing throughout the area.

The Well Development area has been sufficiently investigated for archaeological resources as part of DoD's section 110 responsibility under NHPA in 2004 and 2014. NRHP eligibility assessments were completed as per 36 CFR 800.4(c)(1 and 2). The Church et al. polygon referenced in your comment was included in error, but this has since been resolved with our Geographic Information Systems (GIS) Specialist. The Church et al. survey referenced in this PA Memo still applies. The DoD continues to work with the SHPO's office to reconcile the numerous geodatabases being employed by multiple users. The Guam Synthesis task order currently being completed focuses on refining the data and providing a geodatabase.

DETERMINATION OF EFFECT:
Considering the information presented here, DoD has determined that this project will have no historic properties affected.
P-103 Well Development
Construction Area

Legend

Total APE Area P-103 = 615.5 Acres

- P-103 (Well Development) Project Area
- Military Installations

FIGURE 1
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:** P-103 Water Well Development Construction at Andersen Air Force Base, Guam - Revised PA Memo #2

**SUBJECT:** P-103 Water Well Development Construct at Andersen Air Force base, Guam - Revised PA Memo #2

Date: ______________

Name: ____________________________________________________________________________________________________________________________

**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: ________________________________________________________________________________

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