

## Public Comments Submitted for the Programmatic Memo #1

**Project Title:** P-230 GSE Shop/Shed, AV Armament/Life Support Systems Shop

**Comment Date:** June 16, 2014 (ChST)

**Last Name:** Pangelinan

**First Name:** Vicente (ben) C.

**CRI User Name:** Senator Vicente (ben) C. Pangelinan

**Email:** [senbenp@guam.net](mailto:senbenp@guam.net)

**Mailing address:** 324 W. Soledad Ave., Hagåtña, Guam 96910

### Comments/Questions

1) This PA Memo intends to seek historical documentation of the site location from the public, however, it would be critical that the Department of Defense (DoD) fulfill its own obligation to carry out this type of research beforehand and present it to the public so that better informed comments may be provided by the community. Specifically, this may include conducting oral interviews with descendants of and families from the proposed area and also collect archival history of the land intended for use for this project. This information would then be provided prior to soliciting public comment – in this way, the public is better informed of what is at stake and thus able to comment based on the historical information and research provided in advance. This approach would require more time, but it is this kind of effort that is needed for cultural and historical resource documentation.

2) One historic property is identified in P-230: Historic Property 1 – WW II-era runway complex. Why is the depth of historical data collection for this area limited to the WW II period? As suggested earlier, more effort is needed to provide a deepened sense of history for this site location. In this PA Memo, there is little to no reference or historical findings relevant to the value of the area prior to military occupation, e.g., the history of that area prior to WW II-era runway complex. Undoubtedly, this may be important information; however, historical and archaeological indications of the value of this land prior to military use would be substantive historical data for public knowledge, providing further history of the land that is complemented and enriched.

3) In general, PA Memos should provide more details regarding historical data and cultural resources collection. For P-230, several surveys were listed as resources, however they appear to be dated. What are the requirements for updating for a more current archaeological survey/report to ensure that the public is provided the best updated information? Most current surveys/reports should be accessible to the public.

Since we do not have access the surveys/reports listed in the PA Memo, and some historical research is done, then this information should be provided succinctly in the PA Memo. Do the surveys conducted state whether or not burial sites will be affected in the project area? If so, every effort must be made to ensure that these sites remain untouched and undisturbed and that the protection and preservation of the sacred ancient remains of our Chamorro people are fully exercised. If mitigation is not possible to this end, then the project should be avoided.

4) The methodology—data gap analysis—for supplemental identification and evaluation surveys for the Undertaking was only briefly described in the PA Memo. Further description of this methodology should be provided so that the public is best able to understand the types of surveys used, the implication of such analyses and whether other methods for analysis may be used to further supplement the research methods provided.

5) The PA Memo states that one site is eligible for listing in the National Register of Historic Places (NRHP) because it is partially located within the P-230 project site: History Property 1 – the WW II-era runway complex. If eligible for NRHP listing, what does this mean in terms of use of the area for the project? Would not use of the site for this project impede its designation as an historic place?

6) What is the impact of placing 385 meters of airfield security fencing in the area? If digging and excavation is involved, how does DoD plan to handle the significant historical artifacts found? Will they be removed and catalogued, stored for eventual transfer to the government of Guam? According to the map provided, there appear to be roadways already in place. Will the construction of additional access roadways, curbs and sidewalks be required? If so, what is the impact of this construction on historical properties and cultural resources in the area?

7) If the purpose of this PA Memo is to build on the historical documentation for this proposed site, then more effort should be placed on outreach to encourage public comment. There was one article on the Pacific News Center website dated June 11, 2014 for P-230. As stated in previous comments, 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.

8) On your Cultural Resources Information website, please include a button to subscribe to for notification of the release of NEW PA Memos. Although the memos are listed on your website, it would be easier if the public could request to be notified via email when PA Memos are released. This would help support the timely submittal of public comments within the 30-45 day timeframe.