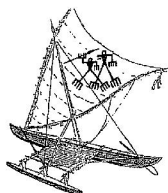




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 Frank Cruz - President • Sandy Yee - Secretary



Traditions About Seafaring Islands

G-508-001

February 5, 2010

JGPO
 c/o NAVFAC Pacific
 258 Malakapa Dr. Suite 100
 Pearl Harbor, HI 96860-3134
 Attention: GMPO


Dear Sir:

The Traditions About Seafaring Islands (TASI) organization opposes the destruction of any native trees that are used by canoe builders. The seafaring traditions of the Chamorro people, extinguished for almost three centuries as a result of colonialism, are only now in the midst of a revival. To destroy natural resources essential to this revival of tradition would be a serious cultural offense.

We recommend that areas with any *dukduk* (*Artocarpus Mariannesis*) trees, *lemmai* (*Artocarpus Altilis*) trees, *fagot* (*Neisosperma Opositifolia*) trees, *da'ok* (*Calophyllum Inophyllum*) trees and *yoga* (*Eliocarpus Yoga*) trees be avoided altogether, and that construction be limited to areas where such trees are not commonly found, such as the two military golf courses.

As a form of mitigation, we also recommend that, for every tree that is destroyed, the military plant 100 saplings in its place, in an environment conducive to its growth and proliferation. This may seem excessive, but the survival rate for saplings of these types is low, therefore many must be planted to replace one mature tree.

Sincerely,


 Frank Cruz
 President TASI
 P.O. Box 22621
 GMF, Guam 96921



And other TASI Members





G-508-001

Thank you for your comment. Natural Resources that have cultural significance, such as native trees, were taken into account in the planning process prior to developing plans for construction. Heavily forested areas were set aside for natural and cultural resources preservation. A mitigation measure is identified in the FEIS to provide opportunity to traditional artisans to collect these resources within cleared areas (Volume 2, Chapter 12).

#	DEIS Ref. Pg.	DEIS Statement	COMMENT
J-032-001	1 VOLUME 2: MARINE CORPS – GUAM 2-15	Proposed Action and Alternatives / Table 2.1-3, Non-DoD Land Parcels Considered Northern plateau mostly undeveloped with exception of Guam Raceway Park facility. Southern valley portion mostly undeveloped with the exception of a stone quarry operation and a few residences	DCA is requesting verification from DOD if this area has ranching by Chamorro families, a cultural practice for many generations. It is common knowledge that arendus exist, such as the Cepeda family. It is also common knowledge that suruhanus forage the medicinal plants from this area.
J-032-002	2 VOLUME 2: MARINE CORPS – GUAM 2-30	Alternative 1 / Proposed Action and Alternatives / Figure 2.2-4 Cantonment/Housing Area	DCA notices Haputo Beach is west of Main Cantonment. Haputo is an ancient Chamorro Village and nationally registered. DCA is requesting that all nationally registered historic sites must be preserved and protected, and no action alternative is highly recommended.
	3 VOLUME 2: MARINE CORPS – GUAM 2-59 Proposed Action and Alternatives	Figure 2.3-13 Firing & Non-Firing Range Alternatives Considered	Figure shows firing range (retained alternative) in Pagat Village historic site. DCA highly recommends no action alternative to registered historic site.
	4 VOLUME 2: MARINE CORPS – GUAM 2-62 Proposed Action and Alternatives	Table 2.3-7, Considered and Dismissed Live-Fire Range Complex Alternatives	Table again identifies Pagat Village to be “carried forward for analysis.” DCA reiterates the cultural value of site. Therefore, a no action alternative is highly recommended.
J-032-003	5 VOLUME 2: MARINE CORPS – GUAM 12-1 Cultural Resources	12.1.1 Definition of Resource In general, specific locations of archaeological sites and traditional cultural properties are not revealed to the public because of the concern of vandalism or cultural sensitivity. Therefore, figures with specific locations of archaeological sites would not be presented in this chapter. However, figures with commonly known sites are presented in Volume 2, Chapter 9, Recreational Resources of this Environmental Impact Statement/Overseas Environmental Impact Statement	DCA is requesting a list of archaeological sites and traditional cultural properties that will be impacted by the buildup, including their Chamorro name, rather than just a “site number”. Since these sites have cultural and research value, the department will be better equipped to provide a comprehensive comment on the buildup’s impact. Every site has a place name with cultural significance, for fishing, farming, traditional ownership, etc.

J-032-001

Thank you for your comment. The resources relied upon in the DEIS do not indicate planned agricultural uses in the areas proposed for acquisition on Guam. The Guam North and Central Land Use Plan (not currently adopted) does not identify planned agricultural use in the areas proposed for acquisition for live-firing training ranges. The potential impacts on agricultural land use are described in Volume 2, Section 8.2, and no significant impacts were identified. Thank you for the information on medicinal plant collecting in this area. Additional information on culturally important plants and their locations on Guam has been included in the Final EIS.

J-032-002

Thank you for your comment. DoD understands the importance of the cultural and historic issues related with land in Guam, and in particular those associated with the Pagat site and the Haputo site. Both the Pagat and Haputo areas are located outside of the proposed construction areas for the projects nearby. Thus, no direct disturbance to the Pagat or Haputo site would occur from the construction or operation of the proposed firing range and from the construction and use of the main cantonment area. The Haputo area is already designated as a preserve area in existing DoD plans and will continue to be protected. DoD plans to provide data to help the Guam SHPO update the Guam Historic Preservation Plan to guide and provide effective stewardship of the resources located there. Several alternative sites were studied and based on the information collected and analyzed, the military use of the locations affiliated with the Pagat and Haputo sites remain suitable for DoD needs and will be carried forward.

J-032-003

Thank you for your comment. A list of all sites and traditional cultural properties impacted by the proposed action are included in Volume 9, Appendix G, Chapter 4, Cultural Resources. If known, Chamorro names

#	DEIS Ref. Pg.	DEIS Statement	COMMENT
		(EIS/OEIS)	
J-032-004	6	VOLUME 2: MARINE CORPS – GUAM 12-14 Cultural Resources Table 12.1-8. NRHP-Listed or Eligible Sites in the NCTS Finegayan Area Haputo Complex Large Pre-Contact/post-Contact village NRHP/GR	Haputo is a nationally registered site, a large pre-latte and latte period village. DCA highly recommends that the few remaining sites be preserved for future research and public access.
	7	VOLUME 2: MARINE CORPS – GUAM 12-16 Cultural Resources Table 12.1-9. NRHP-listed Sites in the South Finegayan Area Latte Stone Park; latte set, cultural deposit NRHP, GR	Latte Stone Park in South Finegayan is a nationally registered site. DCA highly recommends that the few remaining sites be preserved for future research and public access.
	8	VOLUME 2: MARINE CORPS – GUAM 12-16 Cultural Resources 12.1.2.3 Non-DoD Land / Former FAA Parcel The former FAA parcel was subject to a reconnaissance survey by Tuggle and Welch in 1998. They conducted ground surveys along the coastal cliffs and in selected areas of the limestone plateau. At Ague Cove they documented three rock shelters, a cave with rock art, and a midden scatter. Cave with pictographs	A “cave with rock art” or petroglyph is a significant archaeological, historical and cultural site. DCA is requesting that it must be preserved and protected.
J-032-005	9	VOLUME 2: MARINE CORPS – GUAM 12-19 Cultural Resources 12.1.3.3 Non-DoD Land / Route 15 Valley and Escarpment The proposed firing ranges for Alternatives A and B associated with the proposed action are located on the Route 15 valley and escarpment east of Andersen South. Approximately 60% of the Route 15 impact area has been surveyed. The unsurveyed areas are considered to be medium probability areas for archaeology because archaeological sites are known from the vicinity. Resource potential in the Route 15 survey area is high. Near the coast outside the project area, the Pagat Site Complex (Site 04-0022) is contemporary with the historically known Pagat Village, where a Spanish church was built in 1672 (Table 12.1-15). The Pagat Site Complex includes at least 20 latte sets, more than 50 mounds of artifacts and midden, remnants of trails, more	Pagat village, Marbo cave and vicinity must be preserved and protected. Their cultural and historical value are priceless in terms of research to the Department of Chamorro Affairs, in order to promote the intrinsic importance of the Chamorro culture. Therefore, DCA reiterates that they must be preserved and protected.

associated with specific archaeological sites or areas were included in the Final EIS.

J-032-004

Thank you for your comment. Haputo and Latte Stone Park will both be preserved and no construction is planned within these sites. In fact, the DoD plans to provide data to the Guam SHPO to help them update the Guam Historic Preservation Plan that will integrate Haputo in a larger island wide context in order to develop long-term protection for this site. Signage at Latte Stone Park would be updated. No caves with pictographs/petroglyphs or other types of rock would be affected by the Proposed Action.

J-032-005

Thank you for your comment. DoD understands the importance of the cultural and historic issues related with land in Guam, and in particular those associated with the Pagat and Marbo areas. As such, we have proposed to locate the ranges so that no direct disturbance to the Pagat site or to Marbo Cave would occur from the construction or operation of the proposed firing range. In accordance with current consultations, the DoD plans to provide data to help the Guam SHPO update the Guam Historic Preservation Plan to guide and provide effective stewardship of the resources located there. Natural resources that have cultural significance were also considered in our planning efforts and we have planned the alternatives to try to avoid the most densely forested areas. We will continue to work with the Guam SHPO and DCA to avoid, minimize, and/or mitigate effects to historic properties.

#	DEIS Ref. Pg.	DEIS Statement	COMMENT
J-032-005		<p>than 30 mortars and grinding areas, an unknown number of caves and rock shelters, and other features (Carson and Tuggle 2007). Limited test excavations revealed a widespread and dense Latte Period deposit associated with the surface-visible remains, and remnants of an earlier occupation period were present in some locations (Carson and Tuggle 2007). Surveys of the Route 15 impact area indicate as least three other NRHP-eligible sites are located within this area (Dixon and Carson 2009). They include sites 04-0021, 04-0024, and 04-0642. Two of these sites are also traditional cultural properties, including the Pagat site and Marbo Cave, already identified in the Route 15 area (Griffin et al. 2009).</p>	

#	DEIS Ref. Pg.	DEIS Statement	COMMENT
J-032-006	10 VOLUME 2: MARINE CORPS - GUAM 12-28 Cultural Resources	<p>12.1.5 South / 12.1.5.1 Naval Munitions Site Cultural resources identified in NMS include pre-Contact, post-Contact, and multi-component archaeological sites and buildings and structures (Tomonari-Tuggle et al. 2005). Three hundred and eighty-seven resources are listed or eligible for the NRHP or need further evaluation. At least 146 <i>latte</i> sites, containing over 350 <i>latte</i> sets, have been identified in NMS, ranging from single, isolated <i>latte</i> structures to complexes of multiple <i>latte</i> sets combined with other features. Where identifiable, <i>latte</i> sets in complexes exhibit 6, 8, 10, and 12 pillars each in two paired rows.</p> <p>A traditional cultural properties study of Guam was completed in 2009 (Griffin et al. 2009). Two traditional cultural properties were identified in NMS. The Fena Massacre Site has archaeological and ethnographic associations. The Fena Watershed contains numerous archaeological sites and has legendary, archaeological, and ethnographic associations. Concerns over the possible disturbance and disposition of pre-Contact human remains are likely and the presence of petroglyphs and pictographs may indicate past or present ceremonial or religious activities. Pre-Contact human remains have been recovered from caves and rockshelters as well as near <i>latte</i> sites. Specific areas known to have traditional importance to the Chamorro include Almagosa Springs area of Fena on NMS. The Fena Massacre Caves on NMS are the location of annual commemoration ceremonies by the Chamorro.</p>	<p>Same as comment #8. The magnitude of having over 146 <i>latte</i> sites in NMS is reason to have this area NRHP-registered. Therefore, DCA recommends that the site must be preserved and protected, thus allowing DCA to carry forward its mandates of promoting the uniqueness of the Chamorro culture in historical sites in DOD land.</p>

J-032-006

Thank you for your comment. The majority of the *latte* sites are located in areas that would not be disturbed by construction or operations related to the Marine Relocation. In order to ensure that sites within the NMS would not be disturbed during maneuver training in the south, historic property awareness training will be provided to all Marines on Guam. The historic properties in this area are carefully managed through an Integrated Cultural Resource Management Plan that guides the DoD's stewardship of these resources.

#	DEIS Ref. Pg.	DEIS Statement	COMMENT
J-032-007	11	VOLUME 2: MARINE CORPS – GUAM 12-37 Cultural Resources / Finegayan / Construction Construction at Finegayan has the potential to require the removal of dukduk trees, a traditional resource used by canoe builders.	The removal of the dukduk trees is highly discouraged as these trees symbolize the canoe building tradition of the Chamorro and Micronesian cultures. There is a resurgence of canoe building, as evident with organizations such as TASI (Traditions About Seafaring Islands). DCA recommends that the dukduk trees in DOD land be periodically accessed and used by such organizations as a symbol of military-local rapprochement. There must also be efforts to protect Guam's limestone forest.
	12	VOLUME 2: MARINE CORPS – GUAM 12-39 Cultural Resources 12.2.2.2 Central / Andersen South / Construction Construction at Andersen South has the potential to require the removal of dukduk trees, a traditional resource used by canoe builders.	Same as comment #11.
J-032-008	13	VOLUME 2: MARINE CORPS – GUAM 12-41 Cultural Resources 12.2.2.2 Central / Non-DoD Land / Construction Construction of Alternatives A and B have the potential to require the removal of dukduk trees, a traditional resource used by canoe builders, and ifit trees, which are used for timber, fuel wood and craft wood.	This section mentions impacts to medium and low probability areas. DCA recommends that these areas be verified through a comprehensive archaeological study on the cultural value of these areas. Cultural research potential would assist DCA in its mandates to educate the public on Chamorro peoples legacy. In addition, comment #11 applies as well.
J-032-009	4	VOLUME 2: MARINE CORPS – GUAM 12-41 Cultural Resources 12.2.2.2 Central / Non-DoD Land / Operation Part of the construction would include fencing the firing range and restricting access to the public. As a result, operation of the training facilities at Alternative A would restrict public access to the Pagat site (04-0022, an NRHP-listed archaeological site and a traditional cultural property). Restricted access would have a beneficial impact to the site. Reduction in public access would reduce the incidence of vandalism. Also,	Restricting access to the Nationally Registered Historic Site of Pagat Village is not beneficial to the public. Sites such as Pagat Village can educate Guam and the world of its 3,500 year history. DCA disagrees with this assessment and strongly recommends that Pagat Village remain out of the footprint of the military buildup. Marbo cave must not be inaccessible to the public as well. It was the lifecourse of Pagat Village, since it had a water

J-032-007

Thank you for your comment. In recognition of culturally important natural resources, highly forested areas were avoided during the early planning process. In places where impacts could not be avoided, DoD will work with DCA to contact traditional artisans and they will be given an opportunity to collect these resources prior to construction.

J-032-008

Thank you for your comment. The probability maps included in the Draft EIS were based on extensive archaeological surveys of over 5,000 acres on Guam. Since these areas have now been completely surveyed, the Final EIS looks at the impacts to actual NRHP-listed or eligible sites rather than to low or medium probability areas. For impacts to dukduk trees, please see J-032-007.

J-032-009

Thank you for your comment. It is the intent of DoD to maintain public access to the cultural and historic sites at Pagat and Marbo consistent with safety and operational requirements. Restricting access to certain DoD areas at certain times is required to maintain public safety. Final plans concerning access to sites potentially impacted by the proposed action have not been developed. DoD looks forward to working with stakeholders to develop plans for cultural stewardship and access that balances operational needs, public safety concerns, and the continuing public use and enjoyment of these sites. With respect to keeping Pagat and Marbo out of restricted areas associated with the military buildup, DoD was required to determine whether military relocation requirements could be met by excess, underutilized or otherwise available property held by DoD on Guam. Early development plans attempted to keep all activities on existing DoD lands. However, as discussed in the FEIS (Volume 2, Chapter 2), after applying operational and environmental screening criteria, no contiguous DoD area on Guam was identified that

#	DEIS Ref. Pg.	DEIS Statement	COMMENT
J-032-009		<p>these sites would not be affected by cleanup activities associated with the operations at the range because the sites are located outside of any potential impact areas. However, use of the firing range could create an audible change in the setting of the Pagat site. In addition, losing access to the site could be perceived by the public as an adverse impact.</p> <p>Operation of the training facilities at Alternative B would also limit public access to two traditional cultural properties--the Pagat site (04-0022 and 04-0020) and Marbo Cave (04-0642 and 04-0024). This would have a beneficial impact to the sites. These sites would not be affected by cleanup activities associated with the operations at the range because the sites are located outside of the any potential impact areas. As discussed under Alternative A, loss of access to these sites could be perceived as an adverse impact by the public due to their traditional importance.</p>	<p>source. Therefore, Marbo cave must also be left out of the footprint of the military buildup.</p>
J-032-010	5 VOLUME 2: MARINE CORPS - GUAM 12-45 Cultural Resources	<p>12.2.2.4 South / Naval Munitions Site / Construction Three LZs (landing zone) are within medium probability areas and two, NMS 4 and NMS 1, would adversely impact NRHP-eligible archaeological sites. Clearing associated with the preparation of the LZs could have an adverse impact on these NRHP-eligible sites. Construction at NMS has the potential to require the removal of da'ok trees, a traditional resource used by canoe builders.</p>	<p>It is DCA's understanding that this activity will impact a National Natural Landmark (NNL), namely Mt. Lamlam. DCA is requesting the regulations in protecting a NNL site. What are the reasons for Mt. Lamlam to be declared a NNL site? If culturally significant, DCA will benefit from educating the public on this area's cultural importance. The impact will prevent access to people who view this site with spiritual significance. This area is also a place for surubanus to forage for medicinal plants. In addition, comment #11 applies as well.</p>
J-032-011	6 VOLUME 2: MARINE CORPS - GUAM 12-48 Cultural	<p>12.2.2.4 Summary of Impacts Therefore, implementation of Alternative 1 would result in significant adverse impacts to 18 NRHP-eligible</p>	<p>DCA is requesting clarification. Are the "four traditional cultural properties" the following? Pagat Village; Marbo Cave; Hiputo; and Hilaan.</p>

could support all the land use and operational requirements of the action.

J-032-010

Thank you for your comment. Regulations pertaining to the designation and management of NNL sites and information on Mount Lamlam as an NNL is in Volume 2, Chapter 3, Geological and Soil Resources. Pages 3-7 and 3-46 of this Chapter details the NNL status of Mt. Lam Lam. An NNL site designation acknowledges the geologic prominence of Mt. Lam Lam. The caldera at the top of Mt. Lam Lam is the notable geologic feature. An NNL site can be either on private or public land. The FEIS has determined that the Mt. Lam Lam caldera would not be affected by the proposed action. Restricting access to certain areas at certain times is required to maintain public safety. It is the intent of DoD to maintain public access to Mt. Jumullong Manglo (including the Mt. Lam Lam trail) consistent with safety and operational requirements. Final plans concerning access to Mt. Jumullong Manglo (as accessed by the Mt. Lam Lam trail) have not been developed. DoD looks forward to working with stakeholders including groups that use the area for traditional religious activities to develop plans for access that balances operational needs, public safety concerns, and the continuing public use and enjoyment of this site. In acknowledgement of the importance of natural resources of cultural concern, early planning efforts by the DoD to avoid the most heavily forested areas of each alternative were considered. As such, trees such as the nunu, ifit, dukduk, and da'ok, were taken into account in the planning process prior to developing plans for construction and these heavily forested areas were set aside for natural and cultural resources preservation. DoD will work with the Guam Historic Preservation Officer and other interested parties to continue our efforts to avoid, minimize, and/or mitigate adverse effects to these culturally important natural resources.

#	DEIS Ref. Pg.	DEIS Statement	COMMENT
J-032-011	Resources	archaeological sites (9 in the Main Cantonment, 1 in Range Complex Alternative A, and 8 in airfield training areas), six NRHP-eligible architectural resources (at the Ammunition Storage Alternative B), and four traditional cultural properties (two associated with the Main Cantonment and two with Range Complex Alternative B).	All four of these sites contain high cultural value, dating during the Latte Period (ca. 800-1720 AD). They must be preserved and protected for future generations.
J-032-012	17 VOLUME 2: MARINE CORPS – GUAM 12-48 Cultural Resources	12.2.2.5 Potential Mitigation Measures Direct impacts to two archaeological sites in and around North Field at Anderson AFB (sites 1044 and 1046) would be avoided, or if avoidance is not possible then data recovery would take place at sites 1044 and 1046. Operational impacts would be mitigated through training of personnel working in the area to avoid impacts to archaeological sites.	Training of personnel to avoid archaeological sites is not enough. Measures must be taken to “preserve and protect.” DCA is recommending that public access must be allowed as well.
J-032-013	18 VOLUME 2: MARINE CORPS – GUAM 12-48 Cultural Resources	12.2.2.5 Potential Mitigation Measures Direct impacts to 9 NRHP-eligible sites (381, 1012, 1020, 1021, 1022, 1023, 1026, 1678, and 1681) in the Main Cantonment and Housing areas would be avoided, or if avoidance is not possible, data recovery would take place. Indirect impacts to the Haputo site (08-007) and the Latte Stone Park (site 811) from possible vandalism would be mitigated through interpretive signs and documentation. The sign at the Latte Stone Park would be replaced. The Haputo site would be documented and brochures and signs created for public educational purposes.	Brochures and signs may not seem the ideal mitigation measures. DCA recommends cooperation with Guam Preservation Trust in implementing “preserve and protect” measures for all NRHP-registered and NRHP-eligible sites. Cultural resources cannot be appreciated and studied if access is difficult for the public.
J-032-014	19 VOLUME 2: MARINE CORPS – GUAM 12-49 Cultural Resources	12.2.2.5 Potential Mitigation Measures Impacts to traditional resources such as the numu tree, dukduk tree, ifit tree, and da’ok tree, would be avoided if possible. For post review discoveries, an assessment would be made for NRHP eligibility in consultation with the Historic Preservation Office.	Is there a plan to avoid impacts to these traditional resources? DCA is concerned that an assessment of “post review discoveries” for NRHP eligibility will be conducted after construction. DCA highly recommends that an assessment for NRHP eligibility be conducted prior to construction.

J-032-011

Thank you for your comment. The four traditional cultural properties discussed in the Final EIS are Pagat, Haputo, Latte Stone Park, and Mount Barrigada. None of these sites would be directly disturbed by construction. However, they could be impacted by changes in visual settings or by restrictions in access. DoD will continue to work with the Guam State Historic Preservation Office and the public to develop plans to preserve and protect these resources, and to provide access consistent with safety and operational concerns.

J-032-012

Thank you for your comment. Complete mitigation measures addressing cultural resource impacts are available in Volume 7, Table 2.2-1. Final plans concerning access have not been developed, DoD looks forward to working with stakeholders to develop plans for cultural stewardship and access that balances operational needs, public safety concerns, and the continuing public use and enjoyment of this site.

J-032-013

Thank you for your comment. Complete mitigation measures addressing cultural resource impacts are available in Volume 7, Table 2.2-1. DoD understands and recognizes the significance of cultural and recreational sites located on DoD property in Guam. Restricting access to certain DoD areas at certain times is required to maintain public safety. It is the intent of DoD to maintain public access to DoD lands that contain cultural sites consistent with safety and operational requirements. Access will be granted at approved times such as when the lands are not being used for military training. Final plans concerning access to sites potentially impacted by the proposed action have not been developed. DoD looks forward to working with stakeholders to develop plans for cultural stewardship and access that balances operational needs, public safety concerns, and the continuing public use and enjoyment of these sites.

#	DEIS Ref. Pg.	DEIS Statement	COMMENT
J-032-015	20	VOLUME 2: MARINE CORPS – GUAM 12-49 Cultural Resources 12.2.2.5 Potential Mitigation Measures Direct impacts to 2 NRHP-eligible sites 1063 and 1065 at Andersen South, 1 site (1063) at Training Range Complex Alternative A, and 2 NRHP-eligible archaeological sites at NMS would be avoided or, if avoidance is not possible, then data recovery would take place. Potential indirect impacts to NRHP-eligible sites 04-0022 and 04-0021 (Pagat site) in the proposed firing area at Route 15 Alternatives A and B and to 04-0025 and 04-0642 (Marbo Cave and Marbo site) with Alternative B would be mitigated through implementation of a management plan. The Pagat Preservation Plan (sites 04-0021 and 04-0022) would be updated and executed. In recognition of the significance that Pagat cave has to various ethnic and historic groups, cultural access would be granted to the Pagat site when Navy procedures are followed. As stipulated in the PA, access to the Pagat site would be considered in light of military operational requirements and anti-terrorism/force protection security conditions and other pertinent circumstances as determined by the DoD at the time. Operational impacts would be mitigated through training of personnel working in the area to avoid impacts. Provisions for periodic access to Marbo Cave would be instituted if possible.	DCA does not recommend the disturbance of any cultural resources, especially registered sites. What is the definition of "cultural access"? Stipulating strict access to these sites is not mitigable. What is the replacement of these sites to the civilian community as an alternative?
	21	VOLUME 2: MARINE CORPS – GUAM 12-49 Cultural Resources 12.2.3 Alternative 2 (Preferred Alternative) Alternative 2 differs from Alternatives 1, 3, and 8 by the location of the main cantonment. Under Alternative 2, the main cantonment would be constructed at Finegayan and the Former FAA land. Elements of Alternative 2 that are the same as the other alternatives include the aviation training at Andersen AFB, Andersen South, NMS, and Naval Base Guam; the two alternatives for the firing	Same comment #18&20. Emphasis on preserving/protecting and accessing cultural resources.

J-032-014

Thank you for your comment. The Programmatic Agreement, which stipulates mitigation measures to reduce impacts to historic properties, has provisions for monitoring during construction as well as conducting additional testing and data recovery from archaeological sites found during the construction process. In acknowledgement of the importance of natural resources of cultural concern, early planning efforts by the DoD to avoid the most heavily forested areas of each alternative were considered. As such, trees such as the nunu, ifit, dukduk, and da'ok, were taken into account in the planning process prior to developing plans for construction and these heavily forested areas were set aside for natural and cultural resources preservation. DoD will work with the Guam Historic Preservation Officer and other interested parties to continue our efforts to avoid, minimize, and/or mitigate adverse effects to these culturally important natural resources.

J-032-015

Thank you for your comment. Complete mitigation measures addressing cultural resource impacts are available in Volume 7, Table 2.2-1. DoD understands and recognizes the significance of cultural and recreational sites located on DoD property in Guam. Cultural access was used in the Draft EIS to recognize that access to Pagat might be requested because of its cultural importance. In the Final EIS, it has been changed to "public access. Restricting access to certain DoD areas at certain times is required to maintain public safety. It is the intent of DoD to maintain public access to DoD lands that contain cultural sites consistent with safety and operational requirements. Access will be granted at approved times such as when the lands are not being used for military training. Final plans concerning access to sites potentially impacted by the proposed action have not been developed. DoD looks forward to working with stakeholders to develop plans for cultural stewardship and access that balances operational needs, public safety concerns, and the continuing public use and enjoyment of these sites.

#	DEIS Ref. Pg.	DEIS Statement	COMMENT
J-032-015	22	VOLUME 2: MARINE CORPS – GUAM 12-53 Cultural Resources range south of Route 15; and non-firing ranges at Andersen South and NMS. 12.2.4 Alternative 3 Alternative 3 differs from Alternatives 1, 2, and 8 by the location of the main cantonment. Under Alternative 3 the main cantonment would be constructed at Finegayan, Air Force Barrigada, and Navy Barrigada. Elements of Alternative 3 that are the same as the other alternatives include the aviation training at Andersen AFB, Andersen South, NMS, and Naval Base Guam; the two alternatives for the firing range south of Route 15; and non-firing ranges at Andersen South and NMS.	Same comment #18&20. Emphasis on preserving/protecting and accessing cultural resources.
	23	VOLUME 2: MARINE CORPS – GUAM 12-58 Cultural Resources 12.2.5 Alternative 8 Alternative 8 differs from Alternatives 1, 2, and 3 by the location of the main cantonment. Under Alternative 8, the main cantonment would be constructed at Finegayan and the Former FAA land and at Air Force Barrigada. Elements of Alternative 8 that are the same as the other alternatives include the aviation training at Andersen AFB, Andersen South, NMS, and Naval Base Guam; the two alternatives for the firing range south of Route 15; and non-firing ranges at Andersen South and NMS.	Same comment #18&20. Emphasis on preserving/protecting and accessing cultural resources.
J-032-016	24	VOLUME 2: MARINE CORPS – GUAM 12-62 Cultural Resources 12.2.6 No-Action Alternative Existing operations on Guam would continue. DoD management of cultural resources on non-DoD lands at the Harmon Annex or Route 15 would not occur and these sites could be vandalized or allowed to deteriorate. Implementation of the no-action alternative would maintain existing conditions, although there could be a significant adverse impact to NRHP-eligible or listed sites on non-DoD lands.	It is assumed in this statement that cultural resources in DOD lands are not vandalized and not allowed to deteriorate, as opposed to publicly-accessed sites. Is this correct? As noted in DEIS, there are many eligible-NRHP sites in DOD land. Does DOD management of cultural resources program include plans to register their sites?

J-032-016

Thank you for your comment. There are over 600 sites on DoD lands on Guam. The DoD has a vigorous program of managing and protecting archaeological resources on its lands on Guam. Properties managed by the DoD comply with all federal laws relating to cultural resources. Each installation has an Integrated Cultural Resources Management Plan that stipulates the standard operating procedures for evaluating resources according to National Register of Historic Places criteria and long term management of these resources. Because these resources fall under federal jurisdiction and access to many of these areas is limited, they are, in general, protected from vandalism, collecting, or other forms of disturbance that could occur when areas are completely open to the public.

#	DEIS Ref. Pg.	DEIS Statement	COMMENT
J-032-017	25	VOLUME 2: MARINE CORPS – GUAM 12-63 Cultural Resources Table 12.2-1. Summary of Main Cantonment Impacts – Alternatives 1, 2, 3 and 8 / Construction	All alternatives have "Significant adverse direct impacts" for 7-10 archaeological sites. These alternatives demonstrate that there is a rich, cultural value to the people of Guam. DCA recommends other alternatives because of the above statement.
J-032-018	26	VOLUME 2: MARINE CORPS – GUAM 12-63 Cultural Resources Table 12.2-1. Summary of Main Cantonment Impacts – Alternatives 1, 2, 3 and 8 / Operations	Public education is insufficient to ensure the preservation/protection and public access to these cultural sites.
J-032-018	27	VOLUME 2: MARINE CORPS – GUAM 12-63 Cultural Resources Table 12.2-2. Summary of Training Impacts – Firing Range Alternatives Construction and Operation Significant adverse indirect impacts to Pagat site and Marbo site at Route 15 due to operations	DCA seeks clarification on definition of "Significant adverse indirect impacts." The civilian population will be significantly and adversely impacted in a direct way because of the a. loss of access to this site and b. potential damage to the 3,500 year old ancient Chamorro village setting, as will be enclosed within a firing range.
J-032-019	28	VOLUME 2: MARINE CORPS – GUAM 12-64 Cultural Resources Table 12.2-3. Summary of Training Impacts – Ammunition Storage Alternatives Significant adverse direct impacts to 6 NRHP-eligible or listed architectural resources on NMS 12.2.6 No-Action Alternative Under the no-action alternative, Marine Corps units would remain in Japan and would not relocate to Guam. No construction, dredging, training, or operations associated with the military relocation would occur and the Marine Corps would not meet readiness, mission and international treaty obligations. Existing operations on Guam would continue. DoD management of cultural resources on non-DoD lands at the Harmon Annex or Route 15 would not occur and these sites could be vandalized or allowed to deteriorate. Implementation of the no-action alternative would maintain existing conditions, although there could be a significant adverse impact to NRHP-eligible or listed sites on non-DoD lands. In	Same as comment #24.

J-032-017

Thank you for your comment. Early identification, consultation, and predictive modeling resulted in many fewer sites being directly impacted by designing facilities away from or around areas that contained high densities of historic properties. Thus, the vast majority of impacts to resources were avoided. DoD will continue to work very closely with the Guam SHPO and other stakeholders to continue in our efforts to avoid, minimize and/or mitigate adverse effects to cultural resources.

J-032-018

Thank you for your comment. The definitions of significant adverse impacts, as well as direct and indirect impacts are discussed in section 12.2.1 in Volume 2. Significant adverse indirect impacts are effects to historic properties due to "reasonably foreseeable impacts that occur removed in time or space from the proposed action. These are "downstream" impacts, future impacts, or the impacts of reasonably expected connected actions (e.g., growth of an area after a highway to it is complete). It is the intent of DoD to maintain public access to the cultural and historic sites at Pagat and Marbo consistent with safety and operational requirements. Restricting access to certain DoD areas at certain times is required to maintain public safety. Final plans concerning access to sites potentially impacted by the proposed action have not been developed. DoD looks forward to working with stakeholders to develop plans for cultural stewardship and access that balances operational needs, public safety concerns, and the continuing public use and enjoyment of these sites.

J-032-019

Thank you for your comment. There are over 600 sites on DoD lands on Guam. The DoD has a vigorous program of managing and protecting archaeological resources on its lands on Guam. Properties managed by the DoD complies with all federal laws relating to cultural resources. Each installation has an Integrated Cultural Resources Management

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J-032-019		addition, implementation of the no-action alternative would not meet the mission, readiness, national security and international treaty obligations of the Marine Corps.	
J-032-020	29	VOLUME 2: MARINE CORPS – GUAM 12-64 Cultural Resources Table 12.2-4. Summary of Training Impacts – NMS Access Roads Alternatives	As stated earlier in comment #16, it is DCA's understanding that this activity will impact a National Natural Landmark (NNL), namely Mt. Lamlam. What are the regulations in protecting a NNL site?
	30	VOLUME 2: MARINE CORPS – GUAM 12-64 Cultural Resources Table 12.2-5. Summary of Other Training, Airfield, and Waterfront Component Impacts	Same as comment #29.
J-032-021	3	VOLUME 2: MARINE CORPS – GUAM 12-65 Cultural Resources 12.2.8 Summary of Potential Mitigation Measures / Table 12.2-6. Summary of Potential Mitigation Measures	Same as comment #27. Education of cultural resources to Marines and soldiers is insufficient. In order to preserve these sites for another 3,500 years, more stringent measures, will prevent disturbance from military activity. DCA highly recommends that these cultural sites not be part of the buildup footprint.
J-032-022	12	VOLUME 2: MARINE CORPS – GUAM 16-31 Socioeconomics and General Services 16.1.6 Sociocultural Issues / 16.1.6.1 Chamorro Issues and Interests The topics of political minoritization and WWII Reparations discussed below are linked to the military in the minds of many Chamorro and other Guam residents. While they would not technically be —impacted by the proposed action, the issues are frequently raised in the context of military planning.	This statement is in contrast to <i>VOLUME 2: MITIGATION, SUMMARY IMPACTS, CUMULATIVE 3-64 Preferred Alternatives: Summary of Impacts</i> “However, an expansion in non-Chamorro voting population could eventually affect the proportion of Chamorro office-holders and government workers; thereby affecting the current government budgets and activities dedicated to cultural issues and practices. It could also affect outcomes of any future plebiscites about Guam’s political status.” DCA recommends that this issue be discussed by federal agencies that are vested in the preservation and promotion of Native American peoples, such as Chamorros. There needs to be a formal opinion by

Plan that stipulates the standard operating procedures for evaluating resources according to National Register of Historic Places criteria and long term management of these resources. Because these resources fall under federal jurisdiction and access to many of these areas is limited, they are, in general, protected from vandalism, collecting, or other forms of disturbance that could occur when areas are completely open to the public.

J-032-020

Thank you for your comment. Regulations pertaining to the designation and management of NNL sites and information on Mount Lamlam as an NNL is available in Volume 2, Chapter 3, Geological and Soil Resources. Pages 3-7 and 3-46 of this Chapter details the NNL status of Mt. Lam Lam. DoD understands and recognizes the significance of access to cultural sites located on DoD property in Guam. Restricting access to certain areas at certain times is required to maintain public safety. It is the intent of DoD to maintain public access to Mt. Jumullong Manglo (including the Mt. Lam Lam trail) consistent with safety and operational requirements. Final plans concerning access to Mt. Jumullong Manglo (as accessed by the Mt. Lam Lam trail) have not been developed, DoD looks forward to working with stakeholders including groups that use the area for traditional religious activities to develop plans for cultural stewardship and access that balances operational needs, public safety concerns, and the continuing public use and enjoyment of this site. In acknowledgement of the importance of natural resources that are seen as cultural resources, early planning efforts by the DoD to avoid the most heavily forested areas of each alternative were considered. As such, trees such as the nunu, ifit, dukduk, and da'ok, were taken into account in the planning process prior to developing plans for construction and these heavily forested areas were set aside for natural and cultural resources preservation. DoD will work with the Guam Historic Preservation Officer and other interested parties to continue our efforts

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J-032-022			these federal agencies and how these statements in the DEIS are in conflict with their missions and mandates. DCA recommends that their opinions be published and that DCA is given at least 90 days to provide additional comments to the DEIS. Nowhere in the DEIS has references to socio-cultural impacts studies performed, especially conducted by federal agencies on cultural impacts to the Chamorro people.
J-032-023	VOLUME 2: MARINE CORPS - GUAM 16-32 Socioeconomics and General Services	16.1.6 Sociocultural Issues / 16.1.6.1 Chamorro Issues and Interests / Cultural Artifacts The Department of Chamorro Affairs (DCA) is charged with administering and expanding Guam's current relatively small museum for archaeological or other cultural artifacts. An expression of interest has been made that artifacts discovered in archaeological excavations during this EIS/OEIS investigations or subsequent military construction to be stored at this Museum.	There currently is a Programmatic Agreement being drafted between GovGuam and DOD that addresses the storage of excavated archaeological materials in a repository, to be administered by DCA. Should historic sites be impacted as a result of the buildup, the Department of Chamorro Affairs recommends the following: 1. Fully fund immediately a repository to collect, store and study the excavated remains from buildup-related activities. Therefore, at least \$499,000 is immediately needed to secure the repository, and another \$265,850 for staffing.

to avoid, minimize, and/or mitigate adverse effects to these culturally important natural resources.

J-032-021

Thank you for your comment. Complete mitigation measures addressing cultural resource impacts are available in Volume 7, Table 2.2-1. In addition, the Programmatic Agreement stipulates mitigation measures to reduce impacts to historic properties, and has provisions for monitoring during construction as well as conducting additional surveys, testing and data recovery from archaeological sites. With respect to these sites not being a part of the military buildup, DoD was required to determine whether military relocation requirements could be met by excess, underutilized or otherwise available property held by DoD on Guam. Early development plans attempted to keep all activities on existing DoD lands. However, as discussed in the FEIS (Volume 2, Chapter 2), after applying operational and environmental screening criteria, no contiguous DoD area on Guam was identified that could support all the land use and operational requirements of the action.

J-032-022

Thank you for your comment. DoD concurs that a discussion regarding Chamorro issues is warranted and encourages such a discussion. The DEIS acknowledges that the military relocation could impact Chamorro culture and representation. DoD recognizes the importance of reducing adverse socioeconomic and cultural change effects on the people of Guam, the island's natural resources, and infrastructure. The EIS process identifies ways to implement the proposed relocation while minimizing adverse impacts. DoD will continue to work with the people and Government of Guam to ensure that the short-term impacts of construction are managed effectively and that the long-term effects of the military relocation reflect DoD policies to be good neighbors and responsible citizens on Guam. Information regarding political and Chamorro issues in the FEIS have been updated and are available in

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J-032-024	84	VOLUME 2: MARINE CORPS – GUAM 16-32/33 Socioeconomics and General Services 16.1.6 Sociocultural Issues / 16.1.6.1 Chamorro Issues and Interests / Political Status Guam is currently an unincorporated Territory administered by the U.S. DOI. As an unincorporated Territory, the island is a possession of the U.S., but not part of the U.S. and not all provisions of the U.S. Constitution apply to the island. While universal suffrage applies to Guamanians 18 years and older, and Guamanians are considered citizens of the U.S.; they are not eligible to vote in U.S. presidential elections; and Guam's Congressional representative does not have the right to vote on national laws (except in committees).	Please explain more in depth the phrase "but not part of the U.S."
J-032-025	85	VOLUME 2: MARINE CORPS – GUAM 16-33 Socioeconomics and General Services 16.1.6 Sociocultural Issues / 16.1.6.1 Chamorro Issues and Interests / Political Minoritization Most young people are assimilating in the sense that they speak —only English (65% for those five to 17 in 2000, versus 28% —only English for those 18 and over). Among the 11% of children who were Chamorro speakers, two-thirds spoke it less frequently than English — while among the 26% of adults who were Chamorro speakers, only one-third spoke it less frequently than English.	With the buildup's population trajectory, and consequential "political minoritization" of the indigenous people and further straining of their language, DCA recommends that the EIS fully fund immediately the establishment and operation of a pre-k to College Chamorro Language Immersion School in the north, central and south.
J-032-026	86	VOLUME 2: MARINE CORPS – GUAM 16-37 Socioeconomics and General Services 16.1.6.4 Sociocultural Changes Community surveys capture the diversity of community sentiment toward the proposed action. A March 2007 survey by the Guam Chamber of Commerce found 71% of those polled support an increased military presence (Partido 2007). A subsequent survey conducted by the UoG Public Affairs and Legal Studies Club in 2008 found that 52% of those surveyed think that the proposed action is a good thing for Guam and 88% expect the buildup to bring jobs and other economic benefits to	DCA recommends another survey be conducted during and immediately after the comment period. The survey will reflect public sentiment, after some form of public education was implemented in the last 30-days of the 90-day comment period.

Volume 2 Sections 16.1.6 and Sections 16.2.2.4. The DoD carefully considered all requests to extend the length of the comment period beyond the 45-day minimum required by NEPA. In evaluating multiple options, DoD leadership determined that a 90-day comment period best balanced the need for sufficient time to review a complex document with the requirement to reach a timely decision regarding the proposed military buildup on Guam.

J-032-023

Thank you for your comment. The DoD plans to pay for curation costs appropriate to the amount of artifacts collected during the Undertaking. Moreover, consultation and early design changes allowed DoD to avoid over 97% of historic properties, so the anticipated volume of archaeological material resulting from this undertaking are small. Based on the results of an ongoing Curation Assessment, the DoD will identify the most appropriate repository location(s) for archaeological materials collected during the Undertaking. An appropriate repository is one that meets the standards outlined in 36 CFR 79. Should no such repository with available capacity be identified on Guam, the DoD will maintain control of the collections from DoD lands until such time as a repository meeting those standards is available to accept the collections on Guam. The Guam Museum is currently planning to construct a new curation facility that will meet 36 CFR 79 and has requested to curate the artifacts and other cultural material recovered as a result of the Undertaking from non-federal lands once it is constructed. A Memorandum of Agreement (MOA) would be executed to solidify the curation agreement and payment of appropriate curation and processing fees based on consultation with interested parties including the Guam Museum, Guam SHPO, Department of Chamorro Affairs (DCA) and Guam Preservation Trust. Regardless of where the collections would be stored, academic researchers, SHPO staff, Guam Museum staff, and others would have access to the collections.

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J-032-026		Guam. The Guam Chamber of Commerce then conducted a follow-up survey in early 2009 and again found about a 70% favorable response, with slightly higher support among less affluent households (Tamoncong 2009).	
87	VOLUME 2: MARINE CORPS – GUAM 16-37 Socioeconomics and General Services	16.1.6.5 Quality of Life The concept —quality of life overlaps with virtually all topics covered by this EIS/OEIS, and concerns in general the ability of the island to adequately support the proposed action, including how it would affect the island's general tranquility, quality of family and community relations, and standards of living. The 2007 Guam Chamber of Commerce survey noted above found that 60% of polled Guam residents thought the proposed action would improve quality of life. However, there remain concerns that are heightened by the fact that military facilities are segregated from public facilities, and are ultimately seen as better quality than the latter. For instance, DoD's decision to establish its own school system in the late 1990s was interpreted as a —hostile action by some elected officials (Underwood 1997), removing funding from a public school system to establish a separate, competing system. This feeling can be extended to health care infrastructure, housing costs and availability, access to recreational facilities, and competitive pricing (on-base versus off-base).	Same as comment #36.
J-032-027	88 VOLUME 2: MARINE CORPS – GUAM 16-38 Socioeconomics and General Services	16.2 ENVIRONMENTAL CONSEQUENCES / 16.2.1 Approach to Analysis / 16.2.1.1 Methodology / Methods for Sociocultural Sections Sociocultural topics are addressed in a more qualitative fashion. Analysis used available evidence from published sources, interviews, and historical evidence. Some social issues could have many outcomes and are more important to manage than to predict. There are also pre-existing	As noted earlier in comment #32, federal agencies which have interest in promoting and preserving Native American cultures should have a key role in conducting a sociocultural impacts study on the effects of the buildup on the Chamorro people. This study should be made available for further commenting by DCA before a final decision is made. Many federal agency funding programs

J-032-024

Thank you for your comment. Existing conditions regarding the political status of Guam in the document has been edited for the FEIS and no longer contains the referenced phrase. Information regarding political and Chamorro issues in the FEIS have been updated and are available in Volume 2 Sections 16.1.6 and Sections 16.2.2.4.

J-032-025

Thank you for your comment. Your recommended mitigation measure that would establish pre-K to college Chamorro Language Immersion Schools in the north, central and south regions of Guam has been taken under consideration. Please note that DoD has no funding authority for such schools and that like mitigation for other socioeconomic impacts associated with the military realignment, the Economic Adjustment Committee is currently holding interagency discussions with relevant federal agencies concerning funding for Guam's needs, including education. Expanded mitigation discussion is available in the FEIS. Please refer to Volume 7, Table 2.2-1.

J-032-026

Thank you for your comment. The DoD has kept the public informed as required by NEPA, which includes holding public scoping meetings and public hearings allowing the public to comment on the DEIS. DoD has had ongoing discussions with Cooperating Agencies (those federal and local agencies with special expertise or regulatory oversight) throughout the preparation of the DEIS and will continue these discussions with agencies through the completion of the FEIS and beyond. The DoD has also met with elected officials and community leaders throughout the EIS process and will continue to do so during the military relocation. Public comments on the DEIS are an important part of the decision-making process. This information becomes part of the FEIS and is evaluated when DoD prepares the FEIS and issues a Record of Decision at the end of the NEPA process.

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J-032-027		social issues that, due to the nature of the proposed action, may be more often discussed or remembered by residents; issues such as these were acknowledged in the —Affected Environment sections above.	consider Chamorros eligible as “Native American.”
J-032-028	30 VOLUME 2: MARINE CORPS – GUAM 16-40 Socioeconomics and General Services	16.2.1.2 Determination of Significance / Significance Criteria for Sociocultural Sections Sociocultural impacts are largely qualitative in nature, and the analysis focused less on predicting quantifiable impacts than on identifying potential problems and opportunities. However, sociocultural impacts remain an important element of the proposed action and have attracted much public attention and comment. Many sociocultural impacts tend to be mixed in nature. To the extent their —significance can be assessed, it was based on the relative magnitude of the proposed action under consideration. They were regarded as —adverse if they threatened public safety or order, and —beneficial if they preserved or enhanced the social fabric.	DCA recommends definition of “social fabric” in this statement.
J-032-029	40 VOLUME 2: MARINE CORPS – GUAM 16-83 Socioeconomics and General Services	Table 16.2-50. Assumptions for Growth Permitting Agency Impacts	DCA is not identified in this list and therefore requests inclusion. Agency will be impacted as it is mandated (Guam P.L. 21-118;25-69; 29-147) to administer the repository, which will store all excavated archaeological materials from the buildup. The Programmatic Agreement will address this concern. Therefore, as stated earlier, at least \$499,000 is immediately needed to secure the repository, and another \$265,850 for staffing, should the buildup occur, despite DCA’s concerns on preserving and protecting registered sites.
	41 VOLUME 2: MARINE CORPS – GUAM 16-85 Socioeconomics	Table 16.2-51. Additional Growth Permitting Staff Required	Same as comment #40.

J-032-027

Thank you for your comment. The Socioeconomic Impacts Assessment Study (SIAS) and the DEIS are documents that have identified the probable impacts of the proposed action and alternatives based on the best available information. Existing data and information was gathered and supplemented with interviews with federal and Guam agencies. To provide the public and various governmental agencies with an opportunity to review and comment on the methodologies and assumptions used, the SIAS was included as Appendix F, Volume 9 of the DEIS (and is also included in the FEIS). Comments provided on the DEIS will also be included to provide the decision-makers with the public views in support and/or opposition of the proposed action and alternatives. The Chamorro people are not a tribe that has been recognized and, subsequently, are not eligible to receive services from the U.S. Bureau of Indian Affairs (source: Federal Register, Volume 74, No. 153, August 11, 2009).

J-032-028

Thank you for your comment. The meaning of "social fabric" is further discussed, as it relates to social disarticulation, in the land acquisition impact section's discussion on sociocultural significance.

J-032-029

Thank you for your comment. It is noted that the EIS process provides information on environmental impacts (this includes the human environment); however, there is a limit to the specific details of the impacts because the information used is based on the continuation of existing trends and behaviors. While it is not an exact science, the EIS process along with the comments received provide information to the decision makers on the anticipated impacts of the proposed action. The data used in the analysis were derived from surveys and interviews performed in conjunction with the DEIS, and serve as a point-in-time indication of staffing levels. It is acknowledged that it is not possible for

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J-032-029	42 and General Services VOLUME 2: MARINE CORPS – GUAM 16-91 Socioeconomics and General Services	16.2.2.4 Sociocultural Impacts / Chamorro Issues <i>Artifacts:</i> There is a concern that military development could unearth Chamorro artifacts. Chamorro groups such as the Department of Chamorro Affairs (DCA), the Guam Council on the Arts & Humanities Agency, and the Guam Museum are requesting the military give the anticipated artifacts and provide funding to the Guam Museum. Refer to Volume 2, Chapter 12, Cultural Resources for impact analysis.	Same as comment # 40.
J-032-030	48 VOLUME 2: MARINE CORPS – GUAM 16-91 Socioeconomics and General Services	16.2.2.4 Sociocultural Impacts / Chamorro Issues A reduction in Chamorro voting power may also be felt on the policy level. For example, it is commonly agreed among Chamorro politicians that public funds should be spent to support funeral and wake activities. However, non-Chamorro elected officials may not appreciate this cultural tradition and support such things (Guam DCA Interview – Appendix F SIAS).	DCA supports continuation of this tradition. It is more than Chamorro politicians that support public funds for funeral and wake activities. The executive branch, village mayors, and many island residents support this long held cultural tradition, which is part of the “social fabric.”
J-032-031	44 VOLUME 2: MARINE CORPS – GUAM 16-91 Socioeconomics and General Services	16.2.2.4 Sociocultural Impacts / Chamorro Issues On a more purely cultural level, while the loss of the Chamorro language has been occurring for years on Guam, it may be accelerated with the military build-up. Guam’s integration into the larger English-speaking American society has been correlated with a loss of the use of Chamorro language in everyday life. A survey of Chamorro residents (Santos and Salas 2005) found that 90% said the language was a source of pride, and students are learning to read and write the language with more comprehension than most of their elders. However, younger people are much less able to speak and comprehend the spoken language than their elders. Younger people speak the language primarily just with older relatives, not among their peers. This loss of language skills is a common occurrence where a more dominant culture influences a minority culture.	DCA supports the preservation and perpetuation of the Chamorro language, spoken for at least 2,000 years. If the buildup is to occur, as mentioned in comment #35, a mitigation activity would be to create and fully fund the operation of Chamorro Language Immersion Schools.

this analysis to capture all requirements of GovGuam agencies. Your request for additional funding is acknowledged and will be considered by DoD. Please note the DoD has no funding authority for such schools and that like mitigation for other socioeconomic impacts associated with the military realignment, the Economic Adjustment Committee is currently holding interagency discussions with relevant federal agencies concerning funding for Guam's needs.

J-032-030

Thank you for your comment.

J-032-031

Thank you for your comment. Your recommended mitigation measure that would establish Chamorro Language Immersion Schools has been taken under consideration. Please note that DoD has no funding authority for such schools and that like mitigation for other socioeconomic impacts associated with the military realignment, the Economic Adjustment Committee is currently holding interagency discussions with relevant federal agencies concerning funding for Guam's needs, including education. Expanded mitigation discussion is available in the FEIS. Please refer to Volume 7, Table 2.2-1.

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J-032-032	15 VOLUME 2: MARINE CORPS – GUAM 16-94 Socioeconomics and General Services	16.2.3 Summary of Impacts Socioeconomic impacts are anticipated to be largely islandwide in nature with little difference in effects among the various alternatives. The impacts in this chapter are calculated under a scenario that assumes there would be no constraints (blockages) to the rapid development of spin-off private-sector economic activity driven by the military construction and permanent military operational stages. Most impacts are characterized by a burst of activity and impacts in the 2013-2014 timeframe, followed by relatively much lower impacts when construction ends.	DCA disagrees with this statement: "...relatively much lower impacts when construction ends." The loss of access or disturbance of cultural resources will be a permanent impact, not a lower impact.
J-032-033	16 VOLUME 2: MARINE CORPS – GUAM 16-96 Socioeconomics and General Services	16.2.3.4 Sociocultural Impacts More non-Chamorro voters would decrease the possibility of Chamorro political self determination. They would also decrease the possibility of successful plebiscites to achieve greater independence from U.S. control, although at present there is little evidence that a majority would support such moves at any rate.	This statement fails to identify other options such as statehood, free association, etc., as options for political self determination.
J-032-034	4 VOLUME 2: MARINE CORPS – GUAM 16-97 Socioeconomics and General Services	Table 16.2-52. Summary of Impacts Associated with the Proposed Action / Proposed Action-Alt Alternatives / Operations SI-M Significant adverse impacts to indigenous Chamorro efforts to preserve political representation due to lower number of ethnic Chamorro voters, due to increase in non-Chamorro voting population on Guam	DCA recommends that this statement be re-defined as "SI" not "SI-M". It will be a significant impact to Chamorro population. As currently defined, what are the mitigating alternatives, since it is labeled "SI-M"?
J-032-035	18 VOLUME 2: MARINE CORPS GUAM 16-98 Socioeconomics and General Services	16.2.4 No-Action Alternative / 16.2.4.4 Sociocultural Impacts To the extent that Guam experiences job losses crime rates may rise in the short term. The political importance of some Chamorro issues would likely recede as the —militarization of Guam as perceived by Chamorro activists would be stabilized at something close to present levels. Military-civilian relations would likely remain at the current generally positive level.	DCA disagrees with the assertion that only "Chamorro activists" are concerned about the "militarization" of Guam. As stated in comment #36, a survey is needed to be conducted, during and immediately the DEIS deadline of February 17, 2010, to gauge the people of Guam's sentiments of the "militarization" of the island, including demographics on ethnicity.

J-032-032

Thank you for your comment. The comment refers to impacts as a whole and not on one particular resource. DoD understands and recognizes the significance of cultural and recreational sites located on DoD property in Guam. It is DoD's goal to avoid or at least minimize impacts on those resources. Restricting access to certain DoD areas at certain times is required to maintain public safety. It is the intent of DoD to maintain public access to DoD lands that contain cultural sites consistent with safety and operational requirements. Access will be granted at approved times such as when the lands are not being used for military training. Final plans concerning access to sites potentially impacted by the proposed action have not been developed. DoD looks forward to working with stakeholders to develop plans for cultural stewardship and access that balances operational needs, public safety concerns, and the continuing public use and enjoyment of these sites.

J-032-033

Thank you for your comment. Topics such as the political status of Guam are important issues but are not part of the proposed action. Comments related to these issues were numerous and indicate underlying social and political dissatisfaction with longstanding federal-territorial status issues outside the scope of DoD legal authority. The various EIS public engagement forums provided an indirect avenue for informing some and reminding others in local and federal policy-making institutions of issues that are important to a significant segment of the Guam community. Information regarding political and Chamorro issues in the FEIS have been updated and are available in Volume 2 Sections 16.1.6 and Sections 16.2.2.4.

J-032-034

Thank you for your comment. This table has been edited in the FEIS and no longer contains this impact finding.

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J-032-036	19 VOLUME 2: MARINE CORPS – GUAM 16-101 Socioeconomics and General Services	Table 16.2-53. Summary of Potential Mitigation Measures / Mitigation Impact Area Chamorro Issues/Community Cohesion Adverse Impacts Significant adverse impacts to indigenous Chamorro efforts to preserve political representation due to lower number of ethnic Chamorro voters, due to increase in non-Chamorro voting population on Guam Measures DoD can collaborate with GovGuam, the University of Guam, and the Guam Chamber of Commerce to design and implement a scientifically valid semi-annual resident opinion survey, to accurately measure resident concerns and perceptions through the construction period and as needed in the operations phase.	DCA requests the following: 1. That the proposed opinion survey include remedies to resident "concerns and perceptions." 2. That the EIS assure that changes will be made to buildup plans, should "concerns and perceptions" indicate needed changes to "construction period and as needed in the operations phase."
J-032-037	30 VOLUME 7: MITIGATION, SUMMARY IMPACTS, CUMULATIVE 3- 64 Preferred Alternatives: Summary of Impacts VOLUME 1: OVERVIEW 2-5 Overview of Proposed Actions and Alternatives	Sociocultural Impacts / Chamorro Issues Guam's indigenous Chamorro population has strong concerns about whether incoming military populations would recognize them as both American by nationality and also as a unique ethnic culture worthy of respect and preservation. This could be mitigated by orientation programs designed in cooperation with the Department of Chamorro Affairs. However, an expansion in non-Chamorro voting population could eventually affect the proportion of Chamorro office-holders and government workers; thereby affecting the current government budgets and activities dedicated to cultural issues and practices. It could also affect outcomes of any future plebiscites about Guam's political status. Since the peak in construction activities and expenditures	The Department of Chamorro Affairs again has serious concerns to the impact of the Chamorro culture, its language, and traditions. The DEIS lacks substantive impact studies on the survival and perseverance of the Chamorro people. In addition, it is implied that the population increase will affect "activities dedicated to cultural issues and activities", thus negatively impacting programs such as DCA. Also, it is implied that "future plebiscites about Guam's political status" may be affected should the population increase, thus negating Chamorro Self-Determination. DCA therefore recommends mitigation actions be

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J-032-035

Thank you for your comment. The militarization of Guam is discussed in the FEIS as an element of concern for the tourism community (see Volume 2, page 16-100). DoD recognizes the importance of managing efforts in implementing the proposed military relocation to reduce adverse effects on the people of Guam, its natural resources and infrastructure. The EIS process identifies ways to implement the proposed relocation while minimizing adverse impacts. DoD will continue to work to ensure that the short term impacts of construction are managed effectively and that the long term effects of the military relocation reflect DoD policies to be good neighbors and responsible citizens on Guam.

The DoD has kept the public informed as required by NEPA, which includes holding public scoping meetings and public hearings and allowing the public to comment on the DEIS. DoD has had ongoing discussions with Cooperating Agencies (those federal and local agencies with special expertise or regulatory oversight) throughout the preparation of the DEIS and will continue these discussions with agencies through the completion of the FEIS and beyond. The DoD has also met with elected officials and community leaders and will continue to do so during the military relocation.

Public comments on the DEIS are an important part of the decision-making process. This information becomes part of the FEIS and is evaluated when DoD prepares the FEIS and issues a Record of Decision at the end of the NEPA process.

J-032-036

Thank you for your comment. With respect to your first comment, this will be taken into consideration. With respect to your second comment, the FEIS was updated to reflect input on the Draft EIS and includes a number of mitigation measures to reduce or avoid impacts. DoD

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J-032-037		would coincide with the arrival of Marines and their families, 2014 represents the peak year for population increase. At this peak, the total increase in Guam residents from off-island would be an estimated 79,178 people.	<p>identified should "government budgets and activities dedicated to cultural issues and practices" be affected by the buildup.</p> <p>DCA also recommends a comprehensive socio/cultural study (to include Chamorros in the study's development process) be conducted on the survival of the Chamorro people, addressing its traditions, language and culture, as a result of the military buildup. The study must be conducted and reviewed for public comments at least 120 days. The study must be funded by DOD.</p> <p>DCA also recommends that all nationally registered historic sites be preserved, undisturbed, and fully accessible to the civilian population. 5 GCA, Ch.87, Sec. 87136 and Sec. 87130(c)c authorizes the Department of Chamorro Affairs to research and promote the Chamorro culture through its <i>Collective Historic Preservation and Geographical and Archaeological Validation</i> programs.</p>
J-032-038	1	<p>VOLUME 7: MITIGATION, SUMMARY IMPACTS, CUMULATIVE 3-75 Preferred Alternatives: Summary of Impacts</p> <p>3.3.18.2 No Action No land would be acquired by the federal government and those cultural resources that would have had restricted access under the preferred alternative would remain accessible to Chamorros. Recreational resources such as the Guam International Raceway and Pagat Trail would remain accessible to the public. So no action would facilitate the continued existence and accessibility of several cultural and historic resources valued by residents of Guam.</p>	<p>DCA disagrees with 3.3.18.2 and requests its revision. The cultural resources are not accessed by Chamorros exclusively. Chamorros are known for their hospitality. Fiestas are open to all people, without invitation. This is one of the beautiful features of the Chamorro culture. Other cultural resources, such as the Marbo cave, are accessed by hikers and boonie stompers, who are comprised of all ethnicities.</p>

recognizes the importance of managing efforts in implementing the proposed military relocation to reduce adverse effects on the people of Guam, its natural resources and infrastructure. The EIS process identifies ways to implement the proposed relocation while minimizing adverse impacts. DoD will continue to work to ensure that the short term impacts of construction are managed effectively and that the long term effects of the military relocation reflect DoD policies to be good neighbors and responsible citizens on Guam. Adaptive management is proposed as potential mitigation in the Final EIS that could potentially extend the construction period. As currently envisioned (and as discussed in Volume 7 of the Final EIS), adaptive management would entail adjusting the construction tempo to reduce environmental impacts if it is determined that, through monitoring, key infrastructure systems on Guam are reaching "action" or "tipping" points. DoD would chair a multi-agency council that would oversee the application of adaptive management post-Record of Decision.

J-032-037

Thank you for your comment. Through the process of public involvement that has accompanied this proposed action, the Chamorro people of Guam have voiced clearly and concisely their concern that the traditional Chamorro culture, including dance, language and traditions, will be forgotten. While population increases can highlight cultural differences, they also present unique opportunities for cultural learning and sharing. As noted in the FEIS, the DoD plans for cultural sensitivity orientation and awareness programs that will focus on mutual respect and tolerance and strive to educate all incoming and currently present military personnel on the rich and varied cultural history that has created the culture that is Guam today. Finally, the DoD plans to increase military civilian joint activities in order to foster strong and mutually beneficial military civilian relationships that include the sharing and understanding of culture. The SIAS and the DEIS are documents that have identified the probable impacts of the proposed action and alternatives based on

#	DEIS Ref. Pg.	DEIS Statement	COMMENT
J-032-039	62 VOLUME 7: MITIGATION, SUMMARY IMPACTS, CUMULATIVE 3-76	3.3.18.3 Comparison of Preferred Alternatives to No Action The summary impacts of the preferred alternatives would be both beneficial and adverse. The majority of residents on Guam are Chamorros, who were the first known cultural group to inhabit the island. Even though Guam has been occupied by several western nations throughout history, the Chamorros have a long and rich cultural history on the island that continues to exist today. Chamorro cultural and historical resources can be found throughout the land, and are valued by the Chamorros as part of their culture and heritage. The preferred alternative would affect several Chamorro archaeological sites and access to some cultural sites that are currently accessible to the public. This would adversely affect Chamorros islandwide. On the other hand, recognized sites on DoD-managed lands are often better protected than sites on non-DoD managed lands because these resources are protected by DoD cultural resource management plans and various DoD laws and regulations.	DCA recommends that the term "indigenous" be included in the definition of Chamorros in reference to Guam, rather than just "first known cultural group to inhabit the island." DCA is requesting for the best practice method of "DOD cultural resource management plans."
J-032-040	63 Volume 9: Socioeconomic Impact Assessment Study x Executive Summary	SOCIOCULTURAL ISSUES Guam's indigenous Chamorro population has strong concerns about whether incoming military populations would recognize them as both American by nationality and also as a unique ethnic culture worthy of respect and preservation. This is an example of a potential social impact that could either occur or be avoided depending on events and policies. There will be an expansion in non-Chamorro voting population that could affect the proportion of Chamorro office-holders and government workers, eventually affecting the current government budgets and activities dedicated to cultural issues and practices. It could also affect outcomes of any future votes about Guam's political status.	Same as comment #32.
J-032-041	64 Volume 9: Socioeconomic Impact Assessment Study 3-23 Affected	3.5.1.1 Cultural Artifacts The DCA is charged with administering and expanding Guam's current relatively small museum for archaeological or other cultural artifacts. An expression	Same as comment #33.

the best available information. Existing data and information was gathered and supplemented with interviews with federal and Guam agencies. To provide the public and various governmental agencies with an opportunity to review and comment on the methodologies and assumptions used, the SIAS was included as Appendix F, Volume 9 of the DEIS (and is also included in the FEIS). Comments provided on the DEIS will also be included to provide the decision-makers with the public views in support and/or opposition of the proposed action and alternatives. Expanded mitigation discussion is available in the FEIS. Please refer to Volume 7, Table 2.2-1. With respect to protecting cultural sites, DoD's goal is to avoid impacts on nationally registered historic sites. Providing access to important cultural sites on Guam is also a top priority for DoD.

J-032-038

Thank you for your comment. DoD understands and recognizes the significance of cultural and recreational sites located on DoD property in Guam. Restricting access to certain DoD areas at certain times is required to maintain public safety. It is the intent of DoD to maintain public access to DoD lands that contain cultural sites consistent with safety and operational requirements. Access will be granted at approved times such as when the lands are not being used for military training. Final plans concerning access to sites potentially impacted by the proposed action have not been developed. DoD looks forward to working with stakeholders to develop plans for cultural stewardship and access that balances operational needs, public safety concerns, and the continuing public use and enjoyment of these sites.

J-032-039

Thank you for your comment. BMPs are now detailed in Volume 7, Chapter 2, Section 2.1.

#	DEIS Ref. Pg.	DEIS Statement	COMMENT
J-032-041	Environment – Guam	of interest has been made that artifacts discovered in archaeological excavations during the EIS/OEIS investigations or subsequent military construction to be stored at this or a future proposed Museum.	
J-032-042	Volume 9: Socioeconomic Impact Assessment Study, Appendix D, page 463/580	Appendix D / February 2009 Guam Interviews	DCA could not find in DEIS any interviews with Chamorro cultural groups, such as Historic Inalahan Foundation; Famaguon Oro; Hurao; Natibu; Inetnon Gef Pago; or Pa'a Taotao Tano, to name a few. There are also many academics who specialize in Chamorro/Guam culture/history and who could have provided guidance in the DEIS development process. These groups and individuals would have provided valuable insight on the buildup's impact on Chamorro culture and "cultural resources." DCA recommends that these organizations and individuals be afforded time with buildup planners to revise the DEIS and truly reflect the impacts to Chamorro culture and "cultural resources", and before any final decisions are made.
End of Comments			

J-032-040

Thank you for your comment. Topics such as the political status also commonly referred to as “decolonization” and “self-determination” of Guam are important issues but are not part of the proposed action. DoD recognizes the importance of reducing adverse socioeconomic and cultural change effects on the people of Guam, the island’s natural resources, and infrastructure. The EIS process identifies ways to implement the proposed relocation while minimizing adverse impacts. DoD will continue to work with the people and Government of Guam to ensure that the short-term impacts of construction are managed effectively and that the long-term effects of the military relocation reflect DoD policies to be good neighbors and responsible citizens on Guam. Information regarding political and Chamorro issues in the FEIS have been updated and are available in Volume 2 Sections 16.1.6 and Sections 16.2.2.4.

J-032-041

Thank you for your comment. The DoD will curate cultural materials obtained from studies associated with the Marine relocation at curation facilities on Guam, including the Guam Museum. Appropriate payment for the storage of materials will be provided to the facility. Cultural material/artifacts from DoD properties will be curated in a facility that meets 36 CFR 79. The DoD is currently conducting a Curation Assessment that will help in the determination of where DoD collections will be curated. As part of the Section 106 consultation process for the proposed action, a Programmatic Agreement (PA) for all proposed military training activities, construction, and operations, which includes additional mitigation measures and procedures on public access, is being prepared.

J-032-042

Thank you for your comments. During the preparation of the DEIS, many Government of Guam agencies, business and community groups were

contacted and interviewed (see the appendices of the Socioeconomic Impact Assessment Study [SIAS] in Appendix F of Volume 9 of the DEIS). Additionally, meeting and discussion occurred on the cultural aspects of the proposed action, in accordance with the processes prescribed by the Historic Preservation Act. Public comments on the DEIS are an important part of the decision making process. This information becomes part of the FEIS and is evaluated when DoD prepares the FEIS and issues a Record of Decision at the end of the NEPA process. The DEIS reflects data that was collected through documents as well as interviews with a number of federal and local agencies. It covers a number of socioeconomic and sociocultural topics. Socioeconomic scientists who have prepared studies in Guam and Micronesia prepared the socioeconomic study. The objective of the DEIS was to gather the baseline data, review the proposed alternatives, define the level of "significant" impacts, and discuss probable impacts in an impartial (objective) manner. Experienced with preparing EISs in this impartial manner, the preparers discussed a number of issues based on the available information. The overall EIS process provides the decision makers with an opportunity to review the probable impacts, review comments from individuals, organizations, and governmental agencies whether in support or opposition to the proposed action. This provides a deliberative process that was the intent of the National Environmental Policy Act.