DEPARTMENT OF THE NAVY
JOINT REGION MARIANAS
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July 3, 2019

The Honorable Senator Telena C. Nelson
Vice Speaker
Chairwoman, Committee on Education, Air Transportation, and
Statistics, Research, and Planning, 35th Guam Legislature
Hagatna, Guam 96932

Dear Madam Vice Speaker:

SUBJECT: WRITTEN TESTIMONY RELATIVE TO LEGISLATIVE RESOLUTION 164-35

Thank you for this opportunity to comment on Resolution 164-35. I welcome and listen to public comments. Since 2007, the Department of Defense (DoD) has diligently listened to, responded to, and adapted our plans because of input from our island community. Criticisms that the military was haphazard, disrespectful, or otherwise flawed in following federal processes to ensure protection and preservation of historically and culturally significant artifacts are inaccurate. Our actions demonstrate that we have followed Federal law throughout the course of our undertaking, maintained dialogue with participating parties to the Programmatic Agreement (PA) and complied with the provisions that were developed to ensure preservation of Guam's rich cultural history. Today we stand ready to listen again and to continue to engage in honest and transparent conversation, better sharing information about how we balance our national security needs and our environmental and cultural stewardship responsibilities.

My tours on Guam, serving as Commanding Officer, HSC-25 the Island Knights and Commander, Joint Region Marianas, allow me to attest and affirm the true patriotism and genuine hospitality and sincerity of the people of Guam. It is an honor to submit this testimony for consideration by the 35th Guam Legislature just as I similarly testified my views for Resolution 228-34. Our nation was founded on a simple but radical principle; that all humans are created equal and are endowed by our creator with certain inalienable rights. We have struggled, often mightily, to achieve this vision. As a nation, we are not perfect but each day by working together with our neighbors and partners, we move forward making progress towards fully achieving our founding principle. Not merely do the people of Guam share a rich and profound history with the U.S. military dating back through the last century, but more importantly in the present day. We as a community are united as Americans covered and protected under the same American Flag; by the same ideals of freedom and democracy; the same spirit of life, liberty and the pursuit of happiness that makes our nation strong against our adversaries and provides guarantees regionally and globally to security. Our island and the Chamoru heritage are an integral part of this American identity.

I repeat the sentiments I expressed in 2017: that "…my time on Guam has informed me that the multi-layered fabric of the modern Guam society is woven from a unique indigenous culture

and a colonial history underscored by past times of occupation and oppression, but also of hope and success. Our nation was founded on similar weavings of history, first as a British colony, with subsequent Independence marred by religious persecution, civil war and gender and racial discrimination, followed by a vigorous progression of upheavals and later rising to a position of leadership on the global stage. I believe dark ebbs in the tide of history should not constrain the unlimited potential of the American people. Our collective advancement should serve as a beacon of hope, especially for those who call Guam home."

"Peace is necessary to ensure that Guam moves forward confidently towards an outcome chosen by its people, unimpeded by open conflict. We believe that securing the nation today by projecting strength and ensuring readiness is one of the best ways to maintain this necessary peace. We cannot achieve a lasting peace without the patriotic unity of American citizens, foundational understanding of democracy and values of freedom, and the support of our treaty allies. Together, the American people and allies uphold the same democratic values and ideals in our earnest efforts to maintain stability in the region and a free and open Indo-Pacific."

"Now more than ever our peacetime military readiness is critical to first deter any aggressor. But as the people of Guam know all too well know, if deterrence fails our military forces must be trained - not only to fight, but to win. I have been in a position of command where I had to make decisions that I know would put Sailors and Soldiers in harm's way. And I could not bear to do this if I was not certain that the people I was responsible for had received the best training to ensure that each individual had the best chance of success. The Marine commanders on Guam will have that same responsibility."

"It has been suggested to me that we should invest in virtual training ranges on Guam to save money and cause less of an impact to the environment. As a pilot, I am familiar with the value of synthetic training. But even pilots have a limit on the percentage of training that we can accomplish in a simulated environment to maintain our proficiency. For Marines, all the simulators and air conditioned training in the world cannot replace the value of live-fire training, the conditioning that occurs by operating in the environment, and the ability to overcome physical discomfort, heat, fatigue, and stress, and still complete the mission."

"Every Marine is a rifleman! Literally, every single Marine, from administrative support to infantry and even lawyers are riflemen first. And, Live Fire Training Ranges are their best training environments. Just like entering and exiting a port for a ship driver, like operating from a runway for a pilot, Live Fire Training Ranges are where Marines invest in the basic building blocks of their profession. It's where they develop their most basic core competency. Each minute spent on the range increases a Marine's probability of survival, and instills trust and confidence in the Marines by their side."

Following the end of the Cold War, the military reduced its size, including its footprint on Guam as our nation realized a peace dividend. Between 1972 and 2005, military presence fell by roughly 12,560, from more than 17,000 to a low of 4,440 in 2005 and has slowly climbed back up to about 8,800 as we added four permanently assigned submarines, an additional submarine

tender, the U.S. Air Force (USAF) Pacific Training Center, a Terminal High Altitude Air Defense (THAAD) unit and various other capabilities.

The process for re-growing DoD capabilities in Guam is methodical but flexible; we have made adjustments to accommodate the concerns expressed by the Guam and the Commonwealth of the Northern Mariana Islands (CNMI) communities. Our significant progress has come by listening to and collaborating with the communities and leaders of Guam and the entire Mariana Islands. Our processes seek constant improvement which can only be achieved by continuing to communicate and collaborate constructively.

"As a signal of commitment to regional security and our strong Alliance, the U.S. Government and Government of Japan entered into an International Agreement in 2006 that would change the posture of forces in the Pacific included moving Marines to Guam. The agreement was followed by a long, detailed and inclusive process of planning with public participation starting with scoping meetings in 2007, community engagement on proposed alternatives during the public comment period that started in 2009 and initially concluded with a Record of Decision in 2010, which deferred selection of a firing range."

"The proposed action in that initial analysis would have required all construction to be completed in four years and would have required a surge in the workforce of 79,000 new people to the island and as much as an enduring population of 33,000 people. Many in the community expressed their feeling that the plan was unmanageable – too much, too soon. DoD listened, and altered the plan."

"In 2012, in what was called the "Roadmap Adjustment," the proposed development on Guam for the Marine Corps Relocation was reduced by distributing some of the projected Marine Corps growth to other locations such as Australia and Hawaii, which would rebalance force strength in the Pacific west of the International Date Line. Another round of lengthy planning for the Marine Corps Relocation on Guam was performed, again with public participation and regulatory consultations. This re-look at the plans resulted in a 2015 Record of Decision by the Navy selecting Finegayan as the site for the main base, Northwest Field as the site of the Live Fire Training Range Complex (LFTRC), and the reutilization of developed areas for family housing and urban combat training at Andersen Air Force Base."

"Overwhelming feedback from the public and elected officials was crucial in the Navy's second look at the original preferred firing range alternative at Pågat or Route 15 area. The Pågat alternative would have eliminated the highly valued Guam Raceway, restricted access to the ancient village of Pågat, and required the DoD to acquire private and Government of Guam lands. Again, these community comments factored into the Navy's selection of a range complex located within current DoD footprint within the Northwest Field area. The Northwest Field alternative was suggested by those who were seeking to protect Pågat cultural resources and the Guam Raceway. These same members of the public were also the most vocal in expressing that the DoD stay within its footprint. The Navy listened and made a decision influenced by the best available evidence and community concerns."

"In the analysis contained in the Final Supplemental Environmental Impact Statement (FSEIS), the Navy explained how current ranges do not meet qualifications standards for the Marine Corps. The Marine Corps must be ready for any contingency, whether during peacetime or conflict. They must be always prepared to use the full array of small arms weaponry, which includes pistols, rifles and machine guns among others. This unique aspect of a Marine requires that he or she train and qualify on ranges that are more complex and have different configurations than other branches of the Armed Forces. The current ranges in use by the Navy, Army, Air Force and civilian law enforcement are not configured for Marines to properly qualify and be certified in the use of their weapons."

"Existing ranges are too small for the operational training required for the Marines that will come to Guam. Expansion of existing ranges would have constrained both civilian and military land use or air traffic to an unacceptable degree as these activities occur or have been accustomed to the smaller size and less frequent activation of existing buffer areas."

"These buffer areas associated with any range are designed to maintain the highest standard of public safety from the highly unlikely event that a bullet fragment or ricochet may fall within an area within a safety threshold of less than a 1 in 1 million chance. These fragments or ricochets, if they occur would have much less energy than the bullet fired as they are the result of surface or target impact, but people are excluded from the fragment "fall" area as a precaution."

We acknowledge that the construction of the range will impact both natural and cultural resources and we appreciate the opportunity to address these concerns below.

To lay foundation of trust and collaboration, the Navy committed to Four Pillars to take into account many of the concerns expressed by the people of Guam and provided a solid foundation for resolving many of the outstanding issues related to the buildup. These pillars helped guide the subsequent engineering and environmental planning efforts for the Marine Corps Relocation, and these pillars continue to guide DoD actions. The Undersecretary of the Navy committed these four pillars to the Governor of Guam in a letter dated February 7, 2011. The pillars are quoted below:

"First, through our "One Guam" initiative, the Department is committed to improving the quality of life for the people of Guam and the military personnel who will call Guam home. We have secured, and will continue to seek, funding for infrastructure upgrades directly and indirectly associated with the military buildup, and will continue to advocate for federal investment in Guam's other socio-economic needs."

"Second, through our "Green Guam" initiative, the Department is committed to developing the most energy efficient infrastructure possible and supporting Guam's efforts to develop sustainable and renewable energy projects. We will work hard to achieve "net zero" energy usage for our installations on Guam. Moreover, we will work closely with relevant

Guam utilities, Guam agencies, and federal agencies to secure necessary funding for "green" projects."

"Third, the Department is committed to providing 24 hours/seven days a week unimpeded access to the Pågat Village and Pågat Cave historical sites. We will adjust our proposed plans outlined in the final Environmental Impact Statement to continue unfettered access to these important historical and cultural locations."

"Fourth, we will pursue a "Net Negative" strategy for DoD-owned land on Guam. The Department is committed to having a smaller DoD footprint on Guam after the military build-up than we currently hold. We will better utilize the lands we currently have and return underutilized land to the Government of Guam."

"The DoD respects the land it manages, and as an expression of that respect, we manage the environmental impacts of our actions. Our environmental stewardship is well-resourced and is carried out with the support of the environmental industry, academia and our governmental partners. The vast framework of environmental laws we must abide by is in many ways more stringent on our actions compared to the Government of Guam or private development. This is apparent in the scope and breadth of mitigations that we have developed through consultation required under these environmental laws."

"Constructing a new base is a major and unique endeavor on Guam in modern times. Proportional to the scale of development are the unprecedented mitigation requirements that the Navy must follow, particularly as part of the relevant U.S. Fish and Wildlife Services-issued Biological Opinions in 2015 and in July 2017."

"At the forefront of our natural resource mitigation effort is the equivalent forest restoration required for each acre of habitat disturbed at a 1:1 mitigation ratio, and the durable protection of habitat at a 4:1 ratio per acre of disturbed vegetation. To put this set of requirements in real-world terms, if another developer had five (5) acres of property with vegetation on it, that developer would be limited to developing only one (1) acre of that property, and would also need to invest in actively restoring one (1) acre of vegetation within that same lot to a functional forest. On top of these offsets, that developer must also leave the remaining three (3) acres of vegetation undeveloped in perpetuity. Taking this example even further, if you are a residential developer of one (1) acre of property, you can only productively use one-fifth of your lot."

"Although the firing ranges at Northwest Field will remove 89 acres of limestone forest and 110 acres of disturbed limestone forest, DoD is committed to restoring 219 acres of limestone forest to compensate for the loss of vegetation. In addition, DoD will put mitigations in place toward the eradication of ungulates from over 300 acres of higher-quality limestone forest in Northwest Field within the safety buffer of the range. Overall, DoD plans to restore at least 1,000 acres of habitat at Finegayan to offset impacts along with preventing development in 5,234 acres of DoD footprint in Northern Guam. This conservation effort is in addition to supporting additional habitat restoration work at the Haputo Ecological Reserve Area."

Forest enhancement at Finegayan shall consist of construction of ungulate fences, removal of ungulates and invasive plant species, propagation and outplanting of native species, and translocation of endangered plant species from areas affected by construction into this area. We cannot restore forests to a primary native state, this is impossible from a biological and economic standpoint, but we can improve biodiversity and function to support recovery of Guam's rare wildlife such as the native *fanihi* (Mariana fruit bat), *sihek* (Guam kingfisher), *ko'ko'* (Guam rail) and *aga* (Mariana crow) and the *hayun lagu* tree (fire tree, *Serianthes nelsonii*).

Where appropriate in the habitat restoration areas, we will be outplanting a wide range of native limestone forest species, including *Serianthes nelsonii* saplings and other threatened and endangered plants. Under the 2015 Biological Opinion, the Navy has committed to outplanting at least 30 *Serianthes nelsonii* saplings and maintaining these saplings until maturity. The saplings currently growing under the *Serianthes nelsonii* are being protected from pests and ungulates until maturity. Ungulate control for the protection of the *Serianthes nelsonii* includes fencing and then removing ungulates from the entire surrounding plateau area including the nearby planned ranges.

There is planned DNA research that the Navy supports for the *Serianthes nelsonii* that intends to determine if the *Serianthes nelsonii* trees in Rota are an identical species that might be helpful in expanding and strengthening the population on Guam. Regardless of the research findings, the *Serianthes nelsonii* on Guam are fully protected under the Endangered Species Act and the nearest planned firing range was located sufficiently away for its protection. The protective distance between the *Serianthes nelsonii* and the nearest planned range was approved by the U.S. Fish and Wildlife Service. The protective and outplanting actions for the *Serianthes nelsonii* are two of numerous examples of the military's forest restoration and enhancement programs. The Department of the Navy (DON) understands that restoration and enhancement of a forest are long-term programs, requiring a sustained effort for 30 or more years. Continuing collaboration with federal and Guam agencies and the CHamoru community are essential to help ensure the success of this and other endeavors.

The military's commitment to conservation will also have a direct, beneficial impact on the preservation of bat and bird recovery habitat on Guam. Without active forest enhancement, the existing limestone forest on northern Guam, including those at the firing range plateau area, will continue to naturally degrade mostly by ungulates and invasive species to a point where these habitats may no longer be suitable for the recovery of Guam's threatened and endangered species. The lack of birds to disperse seeds, and harmful impacts by invasive animals such as deer, feral pig, brown tree snake and invasive plants such as the ubiquitous *Vitex parviflora* are significantly affecting forests throughout Guam. The Marine Corps relocation brings in short- and long-term resources that will help contribute to existing DoD mission funds for conservation that would reverse this devastating trend of forest degradation.

"The Navy's analysis of impacts for cultural resources was just as complex, if not more so, compared to natural resources. The Navy takes very seriously our responsibility to be

responsible stewards of historic properties. The history of the island is preserved in these cultural resources that provide a connection to the past and forms an enduring part of the indigenous CHamoru people's heritage."

The Navy and the 2011 PA Parties (in accord with the National Historic Preservation Act [NHPA]) entered into a two-step process of first consulting with the public on the impacts of five range alternatives to ensure that each were analyzed sufficiently (in accord with the National Environmental Policy Act [NEPA]), followed by consultation among PA Parties only on the selected alternative after the 2015 Record of Decision (under NEPA) to determine the process of resolving impacts to historic properties. As a result, the Range Mitigation Plan (RMP) under NHPA was signed into effect on October 2015 by DoD and the Government of Guam, with concurrence by the Guam Preservation Trust. The RMP ensures that archaeological sites that will be adversely affected by the LFTRC at Northwest Field will be properly managed in consultation with the Guam State Historic Preservation Officer (SHPO).

It is disingenuous to say that the Northwest Field is the most impactful alternative with regards to impacts to cultural resources. The proposed range alternative with the most impacts to intact latte period resources was the Naval Magazine location, which had numerous standing latte and similar resources. The proposed location with the least amount of cultural impacts was the Route 15 or Pågat alternative, but it also had the highest levels of sociocultural impact due to potential restrictions to access for traditional and modern land uses given that Pågat area is generally open to the public. Northwest Field had the most eligible properties affected in terms of numbers. These affected resources are primarily composed of pottery/artifact scatters around seasonal agricultural resource procurement locations, and post-War earth or concrete structures and we have hired and contracted qualified archeologists to oversee any ground disturbing activities at all sites related to the buildup.

The 2011 PA has also resulted in mutually beneficial outcomes for the military and the local community true to the One Guam pillar. The DoD and Government of Guam succeeded in seeking funds (approximately $12M in federal funds to Guam) for the Guam Cultural Repository, which is a landmark mitigation. There is no other PA in the DON history with a comparable level of offsets for cumulative cultural resource effects that has the potential to be as broad in its benefits to an affected community.

The facility is planned to secure all of Guam's artifact collections, including those in the military inventory, and is intended to treat Guam's cultural record with the dignity and respect it deserves, in compliance with federal curatorial standards.

In addition to the repository, the 2011 PA provides for Semi-Annual Reports on activities related to historic properties, with these reports being posted for the public on the Cultural Resources Information (CRI) website.
[https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/cultural_resources/semi-annual-reports.html]

The 2011 PA also provides the PA Parties an annual opportunity to question and discuss the DoD activities at the Annual Workshops. Just this year these have initiated tours of historic properties for the PA Parties, which have been very well attended and appreciated.

The assessment of potential historic sites is a process which begins with a Navy archaeologist (DoD employee or independent archaeological contractor) evaluating the integrity of the site and eligibility in accordance with historic preservation criteria established by the Secretary of Interior. Following that, the Guam SHPO is notified and afforded the opportunity for the Territorial Archaeologist to perform their assessment. Next, a contracted Secretary of the Interior-qualified archaeologist will assess the site and evaluate its eligibility as a historic property. A plan for resolving adverse effects is then presented to the Guam SHPO for consultation.

Based on initial literature research, local interviews, cultural resource surveys, archeological transect investigations and reconnaissance, over 90 archaeological and historic properties were identified in the vicinity of the live-fire training range complex and it was expected that more archaeological surface scatter historic property would become exposed as inadvertent discoveries prior to construction grading; however, it was anticipated that the expected findings would best be managed through data recovery. There is significant community value in data recovery where evidence suggests similar surface scatters are fairly common; however, the assessment process leaves open the possibility that preserving in place might be recommended. Data recovery provides knowledge of the past, and provides the potential for educational writings, programs, and outreach to future generations.

Without the cultural and archaeological surveys, protection, and especially the wealth of knowledge from data recovery, the CHamoru and other Guam residents would not have learned about the agricultural and horticultural uses of this dry northern limestone plateau. The information gleaned from these requisite preservation actions has been of inestimable value for the future generations on Guam, as well as scientists and historians around the world, to learn of the prehistoric culture and practices in the Marianas. The information is also made available through online publications in English and CHamoru such as at https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/cultural_resources/public-education-and-interpretation-series-booklets.html.

A key preservation component is ensuring a methodical monitoring process prior to and during construction grading. The federal historic preservation process, PA, and consultations with the SHPO and the Advisory Council on Historic Preservation ensured a rigorous archaeological search of historic and prehistoric sites prior to and during construction grading. Recognizing that no pre-construction survey can be 100% definitive in its identification of archaeological sites, our archaeological monitoring process was designed to provide further assurance that before vegetation clearing, during vegetation clearing, stump removal, and again during construction grading, that any previously unknown sites would be detected, analyzed, reported, and appropriately addressed.

The Navy confirms nine discoveries of potential historic value have been made during the vegetation clearing and site preparation activities of the main cantonment and the LFTRC. For every discovery of this nature, per the NHPA Section 106, PA process, and in consultation with the SHPO, the contractor, guided by an archaeologist, establishes a high-visibility fence around the area, including a 30-meter (approximately 98 feet) buffer around each site. Further construction that may affect the potential historic property is suspended until an archaeological investigation is completed. One site completed data recovery and the others are still in the contracting for archaeological assessment stage. Overall project construction continues away from new discoveries in accordance with the agreed historic preservation process.

Here are more details on the process for determination of the appropriate preservation for each discovery. The process includes first evaluating the option for preserving in place, and if not feasible then determining if direct and indirect effects can be mitigated or if data recovery of the historic property for safe curation, research and public display opportunities is the best preservation of the information and artifacts. The outcome of this process resulted in over 76 archaeological and historical sites being preserved in place and only 14 were determined to require data recovery for safe curation, research and public information and display opportunities. Also, findings prior to final design of a range road in Northwest Field resulted in four archaeological sites being preserved in place by relocating the road. These decisions are not made unilaterally; rather, they are made after consultations with subject matter experts from federal and Guam agencies.

"The DoD applied rigorous processes for reviewing other unique resources. One such resource is the Northern Guam Lens Aquifer (NGLA), which is Guam's sole source of freshwater for the northern part of our island."

"As part of environmental review, the DoD presented to the public very comprehensive mitigation measures to protect the NGLA from increased water use due to the relocation of Marines and also potential contamination due to LFTRC operations since the range is above the aquifer."

"U.S. Environmental Protection Agency (USEPA), during their preliminary review period for the draft SEIS, expressed their concerns regarding potential aquifer contamination from munitions use at the LFTRC. DoD updated the draft SEIS taking into account USEPA's concerns, to which USEPA commented: 'We are pleased that the DSEIS states that, prior to the construction of the range, a site survey would be conducted, including installation of four wells; groundwater sampling would occur to provide actual data on the depth, flow direction(s) and quality of water present; and this information would be provided to the [Range Environmental Vulnerability Assessment] program.' In consideration of the importance of the NGLA, DoD in the Final SEIS/Record of Decision committed to a site-specific implementation of proactive, Guam LFTRC-specific (not generic) environmental actions that are more stringent than required under existing policy."

"DoD concluded in the Final SEIS that, considering the implementation of these site-specific environmental actions, the LFTRC operations would result in less than significant impacts to the aquifer. The LFTRC would be located down-gradient from and approximately 2 miles (3 km) from the nearest active groundwater well (AF-5). The Marine Corps commissioned a study on the effects of pumping and drought on the NGLA (USGS Scientific Investigations Report 2013-5216: The Effects of Withdrawals and Drought on Groundwater Availability in the Northern Guam Lens Aquifer, Guam). Information from this report will be used to adjust pumping rates in order to avoid increased salinization and reversal of groundwater flow patterns. Hence, the overall flow of groundwater in this area would not be altered by proposed future pumping rates, and groundwater from the LFTRC area would not flow towards drinking water production wells."

Following through on its commitments to mitigate potential impacts to the NGLA, DoD awarded Guam Waterworks Authority (GWA) a $3.7-million grant for the expansion and rehabilitation of the NGLA monitoring system. The One-Guam Well Installation and Rehabilitation Project is a collaboration amongst Joint Region Marianas, GWA, the University of Guam Water and Environmental Research Institute (WERI) and the United States Geological Service (USGS), and completion of this project enables the NGLA Monitoring Program, and provides the long-term hydrologic data and information needed for effective, sustainable management of the NGLA. An initial $55.6M dollar grant was also awarded to GWA to fix parts of the sewer collection system and the Northern District Wastewater Treatment Plant.

"The Navy will implement specific measures to reduce the likelihood of contamination from construction and operation of the ranges. A few examples of these Best Management Practices (BMPs) to minimize impacts to soil from erosion and potential metals contamination associated with range operations, thereby reducing the potential for soil or sediments to enter nearshore waters include:

- Employing engineering controls and maintain grassy vegetation on berms
- Managing storm water at ranges
- Implementing quarterly inspections of the range Best Management Practices
- Collecting monitoring information (lab sampling and analyses) and range clearance at a minimum of every 5 years."

"Range clearance is the removal and disposal of military munitions (i.e., unexploded ordnance and munitions debris) and other range-related debris. Range managers will ensure all ordnance expended at the LFTRC is tracked. By knowing the expenditures and having the ability to measure the recoverable materials within a defined area, range clearance can be forecasted and scheduled."

"To determine whether there exists a substantial threat of a release of constituents of concern (such as lead) from the LFTRC, groundwater wells shall be constructed at the range, and a baseline groundwater assessment at the LFTRC conducted prior to its operation, and future groundwater quality during range operation shall be compared to this baseline condition."

"Another point of concern is noise from the operational range. The Pågat range alternative had the greatest noise impacts to civilian activities, including residential areas. The Northwest Field alternative does not have noise impacts to residential properties due to its remote location. The Navy modeled potential noise from the firing range and provides this information in its analysis. The modeled noise contours are considered conservative as it does not factor in reduction of noise levels from vegetation as well as the steep elevation change at the Ritidian cliff line."

"Considering the aforementioned, the Navy does not anticipate levels of noise that would damage cultural artifacts within the safety buffer of the range and expects most noise for those outside of the safety buffer during range operation to hear noise no louder than a normal conversation. The actual levels of noise will be verified during operations and a noise study will be completed to adjust modeled noise contours for range management purposes. Cultural sites within the Refuge will be monitored by the Navy for any unlikely impacts from operation of the range. Baseline surveys prior to range implementation will be used to assess any changes, through regular inspection surveys once the range becomes active. Any necessary alterations in usage can be considered at the time any inspections indicate negative impacts to cultural properties."

To address the concern of fishing within the federal and military owned submerged lands outside of Northwest Field's long established near shore conservation area, approximately 65% of recorded fishing trips occurred during weekends and the majority of LFTRC use is expected to occur on weekdays. Training schedules are to be provided to the U.S. Coast Guard to ensure fishers are aware of range operational hours to allow transit of the Surface Danger Zone (SDZ) when ranges are temporarily inactive.

"I also want to take this opportunity to inform your office that a mutually-beneficial aspect of the awarded MILCON P-715 Known Distance Ranges project includes the rehabilitation of existing Route 3A, which is dilapidated and in need of repair. This upgrade enhances access to recreational areas of Ritidian by making vehicular trips to this remote part of our island more safe and efficient."

In closing, we appreciate the sentiments expressed by those who testified at a 2017 hearing Resolution 228-34 and for this Resolution 164-35 and hope the information shared today is beneficial. Throughout its history, the DoD has made it a priority to ensure as much accessibility as possible in its environmental and cultural management practices. This has only increased with the advancement of environmental and cultural management principles and technology, allowing the DoD's conservation and preservation experts better methods and tools that provide a much higher level of accessibility of information and transparency than ever before.

Joint Region Marianas (JRM) strives to sustain connections with leaders and members of the local community and to disseminate information on the progress of the Marine Corps Relocation and our environmental stewardship mission. I was moved by the sincerity and genuine emotion of many of speakers at previous meetings and I was reminded of the military's resolve to defend

my fellow American's freedoms and way of life. These freedoms include the right of Guamanians to speak freely on sensitive topics such as land disputes, cultural identity, and self-governance. These topics are outside the military's jurisdiction and we cannot have positions on such matters, but JRM seeks to understand the sentiments and sensitivities of our community.

Your United States military respects the indigenous CHamoru people, as well as the rich culture and traditions that make Guam a special place. We recognize the deep and abiding affinity of Guam's people to ancient villages and the importance of such sites to island culture. The locally-revered remnants of the ancient village at the Ritidian Unit of the National Wildlife Refuge and Haputo will remain symbols of permanence, cultural integrity and strength; the ancient habitation strewn with latte on those areas will be unaffected by construction of the LFTRC at the Northwest Field plateau and the main cantonment at North Finegayan plateau.

The DON has been inclusive in reviewing the operational impacts of the LFTRC with the public and other stakeholders. The 2015 decision selecting Northwest Field as the site for the LFTRC took into account that it is entirely on federal footprint, does not require significant road construction in undeveloped areas, is within close proximity to the Marine Corps base and avoids significant noise impacts to residential areas. Overwhelming public feedback at the time of the decision demanded no land acquisition, avoidance of Pågat, and minimizing noise and traffic impacts to the broader community.

I believe that we met our goals to provide information in an open and respectful manner and delivered facts in a responsive way. It is our hope that your forum encouraged independent thought and consideration from those who participated and watched.

Members of the military assigned to Guam consider themselves part of the Guam family and as such we are committed to collaborative and open communication with the community as we accomplish our national defense mission.

Sincerely,

S. S. CHATFIELD
Rear Admiral, U.S. Navy
Commander

Note: Passages in quotations throughout this document were previously submitted in testimony to 34th legislature dated September 25, 2017 and remain true today.