

Aug 30, 2010

Lynda, here are DCA's comments on the Programmatic Agreement:

Programmatic Agreement Reference:

IV. IDENTIFICATION AND EVALUATION OF HISTORIC PROPERTIES (page 7)

DCA Comment:

In order to comprehensively report on the cultural significance of all impacted areas, DCA is in need of appropriate staffing to comply with requests. DCA thus requests a funding source in the PA to address this concern. In addition, a timeframe of 90 days is more appropriate to conduct and complete such reports for every request of DCA's determination of a project site's cultural significance.

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Programmatic Agreement Reference:

V. ASSESSMENT OF EFFECTS (page 9)

DCA Comment:

DCA needs more time to review and concur with Appendix D findings. As noted in DCA's DEIS comments, the cultural name of the project areas would be beneficial in determining their cultural significance. Project numbers make it difficult to ascertain the exact location. A detailed map would be helpful of all project areas, noting village names, sub-villages (e.g., Ipan, Sasayan, Oka, etc). At least 6 months of review time is needed to provide a thorough report.

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Programmatic Agreement Reference:

VII. PROJECT OR AREA-SPECIFIC MITIGATION FOR GUAM (page 16)

DCA Comment:

DCA recommends a speedier timeframe for NRHP nomination than the PA's 20-year lifespan. It would be best to complete all NRHP nominations in a 5-year period as DOD lands already contain many identified NRHP-eligible sites, such as the NMS with 146 latte sites.

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Programmatic Agreement Reference:

Part IX CURATION, Section C, Subsection 2a, i and ii (pages 21-22)

DCA Comment:

The Guam Museum is the official depository for all Guam collections. It is incumbent upon the Guam Museum, as mandated by local law, to meet the standards outlined in 36 CFR Part 79. The Guam Museum will have a facility that will meet these standards. With proper funding and support to the Guam Museum it will not be necessary to visit the contingency clauses outlined in Part IX CURATION, Section C, Subsection 2a, i and ii.

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Programmatic Agreement Reference:

20 August 2010 Revision

DCA Comment:

DCA recommends that "Access Plans" be completed before signing of PA.

cc: Sylvia Flores, Tony Ramirez

Si Yu'os Ma'åse',

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