

November 8, 2010

Mr. Donald R. Schregardus
Deputy Assistant Secretary of the Navy/Environment
1000 Navy Pentagon
Washington, DC 20350-1000

**Re: Section 106 Programmatic Agreement for the Joint
Guam and CNMI Military Relocation and Buildup**

Dear Mr. Schregardus:

On behalf of the National Trust for Historic Preservation, we thank you for affording us another opportunity to submit additional comments on the September 15 draft of the Section 106 Programmatic Agreement (PA) Regarding the Military Relocation to Guam and the CNMI. As you know, the National Trust submitted extensive comments on the PA on October 4, which we have enclosed for your reference. Our October 4 letter was the fourth comment letter we have sent to the Navy on the PA in the past year.

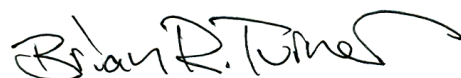
Throughout the consultation process, the National Trust has gone out of its way to be constructive (for example, offering solutions to the problems we have identified in the PA, which would resolve our concerns, rather than offering only criticism), and to be very specific (for example, suggesting detailed language for the PA that would provide an acceptable resolution). Unfortunately, none of these constructive comments seem to have altered the PA or the Navy's basic commitments. Two glaring deficiencies in the Section 106 review process stand out: (1) the refusal to consider alternative sites and configurations for the live-fire training ranges that would avoid or minimize harm to Pãgat Village and other cultural resources; and (2) the failure to address the cumulative effects of the Buildup on historic properties.

We remain deeply disappointed that, despite overwhelming opposition to the Navy's position on these issues, the Navy made no changes to the PA and no effort to respond to community concerns, between September 15 and the November 4 consultation meeting. We believe that the Navy can only achieve a successful outcome in this Section 106 consultation if it makes the effort to revisit its earlier assumptions on these issues and demonstrates a willingness to compromise and an interest in partnering to protect Guam's heritage. We urge the Navy to reconsider its lack of commitment to seeking consensus in this case. Please do not hesitate to contact us with any further questions.

Sincerely,



Elizabeth S. Merritt
Deputy General Counsel



Brian R. Turner
Regional Attorney, Western Office

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Enclosure:
National Trust PA comment letter, dated Oct. 4, 2010

cc: William R. Manley, NAVFAC-HQ Cultural Resources, U.S. Navy
Reid Nelson, ACHP
Caroline Hall, ACHP
Louise Brodnitz, ACHP
Linda B. Aguon, Guam Historic Preservation Officer
Joseph W. Duenas, Director, Guam Dep't of Parks & Recreation