environmental assessment

general management plan

WAR IN THE PACIFIC

NATIONAL HISTORICAL PARK
Guam

MARCH 1983
FINDING OF NO SIGNIFICANT IMPACT

In accordance with the provisions of the National Environmental Policy Act and the regulations of the Council on Environmental Quality (Federal Register, Volume 43, Number 230, November 29, 1978) an Environmental Assessment has been prepared for the General Management Plan for War in the Pacific National Historical Park on Guam.

The Draft Environmental Assessment and General Management Plan were distributed for public comment in 1980. A series of public meetings preceding this distribution assisted in preparation of the documents. Another series of public meetings, following distribution to the public and Government of Guam agencies, reviewed them. A final review, on Guam early in 1983, corrected and clarified some issues prior to final printing of these documents.

Proposals in the General Management Plan cover boundary revisions, concepts for historic preservation and management of natural and cultural resources, development of park facilities, management of visitor use, and unique concepts that respond to the concerns of Guam's territorial government and the Chamarro population on the island. Although great emphasis is placed on historic preservation and interpretation of the Pacific Theatre of World War II, provisions are also made for traditional local uses of park lands along the shoreline. This use is regarded as an integral part of cultural resources management, since these were part of the local culture long before the Pacific war.

Agreement has been reached with the Territorial Historic Preservation Officer and the Advisory Council on Historic Preservation, concerning the proposals and their effect on cultural resources. In addition, agreement has been reached with the Guam Department of planning on compliance with the Coastal Zone Management Plan. Overall responses have been in support of the plan and no recommendations for substantial revisions were made.

As a result of the review and comments received, it is concluded that no substantial controversy exists and that the plan does not have the potential to cause significant impacts on the quality of the human environment. Therefore, based on this conclusion, an Environmental Impact Statement will not be prepared.

The Environmental Assessment is on file and may be viewed at the following offices: Superintendent War in the Pacific National Historical Park on Guam; National Park Service, Pacific Area Office in Honolulu, Hawaii; and National Park Service, Western Regional Office, San Francisco, California.

Approved

Regional Director, Western Region

Date
ENVIRONMENTAL ASSESSMENT

GENERAL MANAGEMENT PLAN

WAR IN THE PACIFIC NATIONAL HISTORICAL PARK
GUAM

Prepared by
UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE
Western Regional Office

March 1983
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ENVIRONMENTAL ASSESSMENT

GENERAL MANAGEMENT PLAN

WAR IN THE PACIFIC NATIONAL HISTORICAL PARK
GUAM

AGENCY: National Park Service, Department of the Interior

ACTION: Inaugurate management and administrative programs for the entire historical park, alter park boundaries and construct interpretive, recreational, and administrative facilities.

ABSTRACT: War in the Pacific National Historical Park is a new unit of the National Park System and the first such area on Guam. The authorizing legislation of August 7, 1978, requires the preparation of a general management plan. Based on this plan, the National Park Service intends to:

1. Preserve the historical remains within the park and on lands proposed for addition;

2. Provide programs and facilities to interpret World War II in the Pacific for Guam residents and off-island visitors;

3. Conserve and interpret significant natural features within the park; and

4. Construct shoreline-oriented recreational facilities for local use in a manner that will help protect the park's historic features.

This environmental assessment evaluates feasible alternatives for boundaries, development, and management that were considered during development of the plan. Other alternatives for park boundaries and development are not considered feasible because of strong public reaction, the concern of local agencies, and the perceived need to preserve additional World War II remains in an appropriate setting.
ADDRESS: All comments should be sent to the Superintendent, War in the Pacific National Historical Park, Guam, with the following address:

Superintendent
War in the Pacific National Historical Park
P. O. Box FA
Agana Guam 96910

INFORMATION: For further information concerning the technical details of the project or its environmental consequences contact:

Superintendent
War in the Pacific National Historical Park
P. O. Box FA
Agana, Guam 96910
Telephone: (011 + 671) 477-8528/9362

OR

Western Regional Office
National Park Service
450 Golden Gate Avenue, Box 36063
San Francisco, California 94102
Telephone: (415) 556-6055
I. STATEMENT OF THE PROBLEM

Previous planning for War in the Pacific National Historical Park occurred before authorization by Congress on August 7, 1978, with the passage of Public Law 95-348, Section 6. In addition to authorizing administration by the National Park Service, the law also requires preparation of a general management plan within two years. The document covered by this environmental assessment is primarily a response to that legislative requirement.

There are, however, several other significant factors that contribute to the need for a general management plan. Since park authorization, considerable additional information has been collected on historic resources, natural features, special concerns of local residents, unique attitudes of the Japanese visitors, and significant management concerns. Such information directly affects recommendations on park boundary refinements, development of facilities, and on park administration.

The cost of construction of all facilities in the park is a major issue. Public Law 95-348 authorized only $500,000 for development. This is clearly inadequate for any development program that has been considered for the park. It was originally perceived as an authorization to construct preliminary facilities until such time as a general management plan and accompanying cost estimate were completed. This document and the accompanying general management plan then become crucial to congressional authorization for additional construction funds.

Planning prior to authorization included cooperation with governmental officials of Guam and through discussions with individual residents in the community. An important part of the preparation of the general management plan was necessarily the involvement of local residents, especially those in Asan, Piti, and Agat since parklands are immediately adjacent to these communities. As more specifically noted in the Consultation and Coordination section of this document, meetings were held in these especially affected communities as well as in Agana. To more adequately reflect the local social and cultural patterns, public meetings were set up through the individual village commissioners and the village planning councils. The information obtained at these meetings was invaluable in preparation of this document and resulted in a number of changes in the development proposals and in proposed changes in the park boundary.
The specific concerns voiced by these residents were very helpful, but it also should be recognized that the needs and desires for local recreational facilities on national historical parklands become a potential conflict with the stated purpose of the park. Primarily, the historical park was created for preservation and interpretation of historic sites and features.

All of these factors combine to require consideration of alternatives such as refinement of the boundary and various proposals for development, especially along the coast.
II. AFFECTED ENVIRONMENT

The following discussion relates to those elements of the historical park's environment that affect or are affected by the actions proposed in the general management plan. It is especially important to recognize the unique natural and cultural features that make up the environment of this small island in the western end of the world's largest ocean.

A. Guam and the Marianas Chain

Encompassing a land area of about 210 square miles, Guam is the largest and southernmost of the 15 islands of the Mariana Islands chain, which stretches for some 425 miles in an arc running generally north and south about 1,600 miles east of the Philippines. They start with Farallon de Pajaros, 335 miles southeast of Iwo Jima, and end with Guam, 250 miles north of the Carolines. The four largest islands, Saipan, Tinian, Rota, and Guam, are all at the southernmost end.

Guam is the natural focus of activity within the Mariana Islands chain and Micronesia. It is the largest and most populated island between Hawaii and the Philippines, having an excellent, well-equipped port and being a major communications center. A crossroads of major air routes, Guam is about three to four hours by jet from such major Asian cities as Tokyo, Seoul, Hong Kong, Manila, Shanghai, and Taipei. In effect, it is the "metropolitan" center of a vast western Pacific area.

1. Geography

Guam is 32 miles long and four to nine miles wide. The northern half of the island is a limestone plateau, ringed by cliffs 500 to 600 feet high. The island's southern half is a range of volcanic mountains and hills paralleling the west coast and rising steeply to more than 1,000 feet above sea level and sloping more gently toward the east.

Fringing reefs surround most of the island at a distance of less than 3,000 feet from the beach; beyond this, the ocean floor drops quickly to great depths, to more than 30,000 feet in the Marianas Trench 60 miles off the south and east coasts. The coastline varies with locale, from pitted, emerged coral limestone to low, swampy lands or sandy beaches.
Farallon de Pajeros
Maug Islands
Asuncion Island

Agrihan
Pagan

Mariana Islands
Alamagan
Guguan
Sarigan
Anatahan
Farallon de Medinilla

SAIPAN
Tinian
Aguijan
Rota

GUAM

War in the Pacific National Historical Park
United States Department of the Interior/National Park Service

*Information from Jan.'78 Pacific Planning and Design Consultant Map.
2. Climate

Guam is within the tropics, and thus has a mild, even climate. Temperatures average 81°F with extremes of 64°F and 95°F reported over the last 26 years. The yearly average rainfall of 90 inches can be divided into two seasons. About two thirds occurs from July to mid-November, when some rain falls during 20 to 25 days per month. January through April is the dry season, with 5 to 10 percent lower humidity and lower temperatures. Easterly tradewinds are very common at an average of 6 to 10 miles per hour.

The wet season is associated with tropical storms or typhoons which can cause considerable damage on Guam. In May 1976 super-typhoon Pamela caused millions of dollars of damage throughout Guam and clocked winds of up to 190 mph. Such storms are also accompanied by high seas and flooding from very heavy rainfall.

3. Population

The 1980 census shows Guam's resident population to be about 105,000. Based on earlier estimates, it can be divided into three distinct groups, consisting of about 50% persons of Chamorro ancestry, 20% military personnel and dependents, and about 30% from the U.S. Mainland, other Pacific Islands, and from the Asian nations of Japan, Korea, and Taiwan.

The population is also characterized as youthful. Close to half is under 18 years old and only about two percent is 65 or older. Population concentration is expected to remain as it is now in the central and north-central part of the island. By the end of this century, the population is expected to be more than 200,000.

4. Access and Circulation

Commercial airlines are the primary means of access to Guam, although a few visitors arrive by cruise ship. Airlines also provide frequent service from Guam to other Marianas Islands.

A network of good, paved roads offers convenient access to much of the island, including almost the entire coast of southern Guam and many points on the northern plateau.
All units of the national historical park are within the populous central section of Guam and all, except the Mt. Alifan and Mt. Chachao/Mt. Tenjo Units, are adjacent to a major traffic route. The Asan units are only three miles west of Agana and a 15-minute drive from the air terminal.

B. History

Guam's history involves the complex mixture of a unique, ancient immigrant culture, the overlay of a totally foreign culture, and the overwhelming changes precipitated by that overlay. Military operations during the past 30 years have also had a major effect, such as bringing Guam to its present strategic importance in the Pacific Basin.

Knowledge of Guam's historical background is an important element in formulating concepts for interpretation. Unique cultural characteristics are important in determining the types and scale of park facilities needed.

The island's earliest known settlers are believed to have migrated from Southeast Asia about 3,000 years ago. These settlers developed a complex civilization and an estimated population of up to 100,000 by the time of the first European contact. Locally, this contact is believed to have begun with the landing of Ferdinand Magellan on the island in 1521 during that historic circumnavigation of the world. In 1565, Miguel Lopez de Legaspi claimed Guam for Spain. The resulting clash of European and Chamorro cultures led to bloodshed and epidemic diseases which killed many of the original inhabitants of Guam and destroyed much of the original culture.

The Spanish then repopulated the island mostly with Filipino laborers and fortified it to protect and supply the silver-laden Manila galleons with food and water. These ships sailed annually from Acapulco to the Philippines until about 1815. The Spaniards converted the Chamorros to Catholicism, beginning in 1668 with the arrival of Father San Vitores, his assistants and a band of Spanish militia.

Following intermittent rebellious warfare and an eventual period of peace, the Spanish constructed roads and fortifications (the remains of which are still visible in many places). Guam became an American possession in 1898 as a result of the Spanish-American War.
It is important to note that the Chamorro language has survived the numerous changes in administration and cultural impacts. In fact, it is still commonly used by residents throughout Guam.

C. Guam Today

In 1950, The Organic Act of Guam granted U.S. citizenship to all Guam residents and replaced the naval government with an appointed civilian administration. At this time they also elected their first Territorial Legislature. In 1970, Guam's citizens for the first time, were allowed to elect their Governor and Territorial Legislature. Guam gained a nonvoting seat in the U.S. House of Representatives in 1973. A referendum early in 1982 indicated a strong interest in continuing status as a territory.

The requirement of security clearance for entry into Guam ended in 1962. This cleared the way for a boom in business and tourism. A referendum vote in 1982 confirmed a continued local interest in improving political ties with the United States. More recently, however, some concern has been expressed about what is seen as excessive Federal control. Federal laws are perceived as hampering the economic growth of Guam. Guam has no vote in Congress and residents cannot vote in national elections or on related issues concerning self-government. This has caused further resentment, which surfaces during public planning meetings.

Guam is also undergoing rapid economic changes, mostly due to removal of restrictions that were imposed by military requirements. The changes are most dramatic, in that they have permitted development of a tourist industry. This is a significant diversification of an economy which was previously almost solely dependent on military activities. It should be noted that although some U.S. Mainland tourists visit Guam most visitors are from Japan. This predominance of Japanese tourists has a decided effect on interpretation and on park facilities. Table I indicates points of origin for Guam's visitors (1982 figures).
In addition, tourist visitation has increased at a fantastic rate since its beginnings in 1963, when the island received about 1,500 visitors. Table II below indicates how rapidly visitation has increased since 1967 and shows that the overwhelming majority arrives by air.

**TABLE II**

**VISITOR ARRIVALS TO GUAM BY AIR**

<table>
<thead>
<tr>
<th>Year</th>
<th>Total</th>
<th>Japan</th>
<th>North America/Hawaii</th>
</tr>
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<tbody>
<tr>
<td>1967</td>
<td>6,600</td>
<td>(est)66%</td>
<td>not available</td>
</tr>
<tr>
<td>1968</td>
<td>18,000</td>
<td>35</td>
<td>38%</td>
</tr>
<tr>
<td>1969</td>
<td>58,265</td>
<td>50</td>
<td>32</td>
</tr>
<tr>
<td>1970</td>
<td>73,723</td>
<td>60</td>
<td>24</td>
</tr>
<tr>
<td>1971</td>
<td>119,124</td>
<td>71</td>
<td>17</td>
</tr>
<tr>
<td>1972</td>
<td>185,399</td>
<td>75</td>
<td>16</td>
</tr>
<tr>
<td>1973</td>
<td>240,344</td>
<td>70</td>
<td>15</td>
</tr>
<tr>
<td>1974</td>
<td>261,575</td>
<td>66</td>
<td>11</td>
</tr>
<tr>
<td>1975</td>
<td>260,692</td>
<td>67</td>
<td>9</td>
</tr>
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<td>1976</td>
<td>201,344</td>
<td>69</td>
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<td>1977</td>
<td>240,467</td>
<td>63</td>
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<td>1978</td>
<td>231,975</td>
<td>73</td>
<td>13</td>
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<td>1979</td>
<td>264,326</td>
<td>72</td>
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<td>1980</td>
<td>291,133</td>
<td>76</td>
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<tr>
<td>1981</td>
<td>312,862</td>
<td>81</td>
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</tr>
<tr>
<td>1982</td>
<td>316,746</td>
<td>84</td>
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**VISITOR ARRIVALS TO GUAM BY CRUISE SHIP**

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<thead>
<tr>
<th>Year</th>
<th>Total</th>
<th>Japan</th>
<th>Australia</th>
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<tbody>
<tr>
<td>1976</td>
<td>3,752</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1977</td>
<td>5,361</td>
<td>2,416</td>
<td>2,945</td>
</tr>
<tr>
<td>1978</td>
<td>6,571</td>
<td></td>
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</tr>
<tr>
<td>1979</td>
<td>8,355</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1980</td>
<td>8,603</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1981</td>
<td>8,904</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1982</td>
<td>9,595</td>
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The largest number of these visitors (close to 75%) remain in Guam for one to three days, about one-eighth remain for four days, and about one-eighth for five to nine days.
Construction of hotels has attempted to meet the increasing demand for accommodations, and by the end of 1982 there were approximately 2,400 hotel rooms available on the island. The major part of the construction occurred in the late 1960's and early 1970's.

Although military activities and the visitor industry are the major sources of Guam's income, international banking and perhaps fishing may develop into more important roles in the island's economic future. Moreover, Guam serves as the Pacific center for a number of U.S. firms.

D. The Park -- Physical Description and Cultural Resources

War in the Pacific National Historical Park, as now authorized, consists of six physically separate units lying generally in an arc between the west end of Agana and the south end of the village of Agat. A brief description of each unit follows.

Each unit of the park contains specific resources related to World War II. Some are significant because they were important in the battle for the recapture of Guam by the United States and others contain significant physical remains of structures or equipment. In the summer of 1979, Dr. Duane Denfeld was under contract to the National Park Service to locate, identify, and record all physical remains in the historical park and on immediately adjacent lands. Additional data on cultural resources was also provided by the Archeology Laboratory of Guam's Department of Parks and Recreation, and by individual residents of communities adjacent to the park. This information has been a very important element in determining locations for interpretive facilities, for suggesting boundary refinements, and for identifying areas that could be used for recreation by Guam residents.

The following description of cultural resources is by specific units, some of which include sites significant to Chamorro culture and history. A map of each unit indicates the location of specific sites and historic remains. Recent data indicate that it may be impossible to document exactly how the parklands looked before World War II, but local residents have contributed enough information to provide an accurate, general picture of the prewar setting.

1. Asan Beach Unit (109 land acres and 445 offshore acres)

Occupying mostly offshore area, this unit includes all lands on the ocean side of Marine Drive between Adelup
Point and Asan Point. Except for the limestone promontories of these two points, the land is a flat, coastal plain with a sandy beach, 15 to 30 feet wide, fronting the shoreline. The offshore area encompasses extensive reef formations, up to 1,000 feet wide, paralleling the shoreline. Water inside the reef varies from one to four feet deep and during the low tide many areas of the reef are exposed. There is one small islet, Camel Rock, near Asan Point.

Existing development consists primarily of privately owned homes and small businesses along the central shoreline. Adelup Point contains an elementary school adjacent to the park boundary. The Asan Point vicinity, or the old "Naval Hospital Annex," encompasses the largest landmass. It contains the remains of abandoned development including one building, extensive paved roads and parking, and concrete building foundations.

The historic features associated with World War II are mainly on the Piti side of Asan Point and around Adelup Point. They include gun emplacements, caves, a few foxholes, at least ten pillboxes, and miscellaneous foundations. All are associated with Japanese defenses. In addition, the remains of some pieces of American equipment lie underwater in the offshore area. There are also some significant Japanese defense structures immediately adjacent to the authorized park boundary on the east side of Adelup Point.

The large, flat, open area between Asan Point and Asan River has only two minor surface remains from World War II. Construction of the Naval Hospital Annex in the 1950's and the associated deposit of about two feet of coral limestone fill have obscured any features that might have remained.

Prewar use of the Asan Beach Unit was associated largely with use of the reef flat for food gathering. Prewar Asan village was a coconut-shaded community with rice paddies and other scattered agricultural activities. Part of the village destroyed during the American invasion was located where the postwar Naval Hospital Annex was built. The village was moved to its present location farther east after the war.

Camel Rock is important in Chamorro legends. A historical monument dedicated to Mabini, a Philippine patriot, is on the shoreline and the site of a detention camp for
World War I German internees is nearby. Toward the center of Asan Bay there is a small memorial to the American invasion forces. This is culturally important to the people of Asan village and memorial services for World War II dead are held there annually. The map on page 12 indicates the location of these sites and remains.

2. Asan Inland Unit (593 acres)

This largest land area in the park is also the least developed and contains the most rugged terrain. Lying generally between Asan village and the top of Nimitz Hill, elevations vary from sea level to about 500 feet. Several small streams drain the rugged volcanic hills of the western half and heavy vegetation covers much of the eastern limestone area.

Except for a few private residences and a short, low-standard road at the Asan Point end, there is no existing development.

This entire unit was a major battlefield during the 1944 battle for Guam. Most of the physical remains, however, are at either end of the unit, just above Adelup and Asan Points. These consist mostly of caves, a few pillboxes, foxholes, miscellaneous foundations, and a 75mm mountain gun. Perhaps the most important feature of this unit is its primitive state. Historic features lie under thick jungle growth or savannah grasses on terrain little changed since 1944.

There are no known significant features related to prewar times or Chamorro culture. Some portions of prewar Asan village are in the low-lying portions, but there was little use of the steep upland terrain.

3. Piti Guns Unit (24 acres)

This is the smallest unit in the park, lying in hilly terrain just above the village of Piti. There is no existing development except for the three historic Japanese coastal defense guns and one residence. This unit was included in the park to preserve and interpret three Japanese coastal defense guns in good condition. The immediately adjacent mahogany grove has historic significance because it was planted in the 1920's and 1930's. Prewar use of the land was mainly as a forest planting area by an agricultural experiment station.
4. Site of the Japanese Command Post at Fonte Plateau

Although not now included in the authorized park boundaries, this is a historically significant site located on Nimitz Hill near the headquarters for the Navy's operations in this part of the Pacific.

Here General Takashina, commander of the Japanese forces, had his command post during the initial hours of the battle for Guam. The U-shaped cave once used for the command post, and later as a typhoon shelter, is now abandoned. There are few, if any, additional physical remains on the site.

The area is comprised of steep terrain except for the bottom of the quarry. Nearby is a promontory with an outstanding view of northern Guam and a small depression that was one of the significant battle areas.

5. Mt. Tenjo-Mt. Chachao Unit (45 acres)

The land in this unit lies in a narrow strip along or near the top of a ridge between Mt. Tenjo and Mt. Chachao. It generally follows a primitive road with a larger land area at either end where there are excellent overlook points. There are a few historic remains including foxholes, the site of a prewar American gun emplacement, and some other minor sites and objects. Its major purpose is to provide overlooks that view the Agat and Apra Harbor vicinity. The American gun emplacement played a role in World War I. There is no known prewar or Chamorro cultural significance.

6. Mt. Alifan Unit (158 acres)

The villages of Santa Rita and Agat are immediately adjacent to this unit, which lies on the western slopes of Mt. Alifan and below its summit. The terrain is hilly, open grassland except for a small area of thick jungle growth on the upper slopes. There is no existing development except for an abandoned road that bisects the area.
HISTORIC BASE MAP
MT. CHACHAO / MT. TENJO UNIT
War In The Pacific National Historical Park

SCALE IN FEET
0 2000 4000 6000
NORTH
EXISTING PARK BOUNDARY
WORLD WAR II RELATED SITES
STRUCTURES AND OBJECTS
The Mt. Alifan Unit contains the largest concentration of sites and structures in the park. These thirty-odd sites include two pillboxes, 13 caves and tunnels, bomb and shell craters, and numerous foxholes and gun emplacements. Some of the remains, such as craters and foxholes, are somewhat fragile because of unstable soil conditions.

Prewar uses of the Mt. Alifan Unit were predominately for the cultivation of field and tree crops and for cattle pasturing. Apparently the animals were tethered rather than fenced. There are no known sites important to Chamorro culture except for one area where a scatter of prehistoric pottery is found.

7. Agat Unit (38 acres land, 557 acres water)

This is primarily an offshore area and the land is a series of small parcels a few hundred feet wide between the coastal road and the shoreline. Terrain is composed generally of coral outcroppings not more than 20 feet in elevation, interspersed with a low-lying shoreline. A coral reef parallels the shoreline and extends from 1,000 to 1,500 feet from the beach. Several small islets and two larger islands, Alutom and Bangi, are also included in the unit. Water inside the reef is one to four feet deep and during low tide some of the reef formation is exposed.

There are several existing developments. A few residences exist at Bangi Point and near Finile Creek. An abandoned sewage outfall and a roughly graded parking area are located near Gaan Point. There is an access road, parking area, and a substandard comfort station at Rizal Point. The National Park Service has recently opened a picnic area at Apaca Point. Local residents frequently use the beaches and offshore area for recreation, boat launchings, and food gathering.

Historic remains include caves, bunkers, latrine foundations, and more than 10 pillboxes, some in excellent condition. Even with their ease of access and their proximity to Agat's urban development, they retain a surprising amount of integrity and setting. The remains at Gaan Point, in the approximate center of the Agat invasion beach, provide a prominent view of both the beach and offshore area. Alutom and Bangi Islands
HISTORIC BASE MAP
AGAT AND MT. ALIFAN UNITS
War In The Pacific National Historical Park
also contain some historic remains, and there are remains of U.S. amphibious equipment underwater near the edge of the reef.

Hill 40, one of the more desperately contested sites in the battle for Guam, lies outside the park boundary inland from Bangi Point. Recent field surveys have not uncovered any remaining physical evidence of the intense struggle in 1944 and the area is greatly altered now.

The significance of prewar sites in the Agat area relates primarily to Chamorro legend. The two Pelagi islets, near Apaca Point, are said to have originally been a Chamorro canoe and the articles jettisoned from it when it began to leak. These two islets are also said to be a predictor of sea conditions, with differences in the sound of wave action indicating if the sea will intensify or slacken.

Prewar Agat population was small, fewer than 800 persons. The village was also located north of the existing development. Use of the shoreline area was for subsistence fishing and for frequent Sunday outings for picnicking and recreational fishing.

8. Other Significant World War II Sites on Guam

In accordance with Public Law 95-348, Section 6(d): "Other points on the island of Guam relevant to the park may be identified, established, and marked by the Secretary in agreement with the Governor of Guam." A beginning listing considered especially significant is given here. Their locations are shown on the map on page 20. Further research and discussion with local citizens will very likely reveal other important sites, which may be considered for marking.

a. Camp Manengon, near Ylig

The Japanese placed many Guamanians into camps around July 15, 1944; some died en route to the camp. Manengon was the largest (10,000-15,000). Heavy rain arrived with the marchers, and the result was a sea of mud, where people lived in the open on both sides of the Ylig River. Men lashed shelter frames from poles they cut; women wove coconut palms into mats for roofs, walls, and floors. Food ran out shortly after arrival and people lived off the land. Shortly after the American invasion, Manengon became a refugee camp. Healthier families left for their ranches or other refugee camps as soon as it was safe to do so.
Manengon represents the single move by the Japanese which insured the survival of Guamanians as a viable ethnic group. In such camps, they were removed from the American bombardment, invasion beaches, and the crossfire. Manengon also represents the needed assistance by the Americans to the Guamanians at the time of the invasion. The Manengon camp site now lies among peaceful ranches in a rural setting.

b. Tweed's "Cave," Pague Point

George R. Tweed, a U.S. Navy radioman, was one of six American sailors who hid from the Japanese on Guam and the only one who survived. The other five were caught and executed within a relatively short time. All were helped by Guamanians; in so doing, these Guamanians put their own bodies and lives and those of their friends and relatives in jeopardy. Tweed lived in the "cave," actually a crevice in a cliff, for his last 21 months on the island before he was picked up by a U.S. warship.

c. Father Duenas Execution Site, Tai

Father Jesus Baza Duenas, 30, was beheaded by the Japanese before dawn, July 12, 1944, only a few days before the American liberation of Guam. He was among those Guamanians accused of knowing the whereabouts of Tweed. His arrest came July 8; his death came after torture. Executed with him were his nephew, attorney Eduardo Duenas; Tun Juan (mili) Pangelinan, a retired Navy man; and a fourth man unidentified.

Father Duenas, one of three Catholic priests on the island at the time, was openly hostile to the Japanese but was prominent as a Guamanian leader. The Father Duenas Memorial High School stands on or near the site. The execution site has become a memorial for the numerous Guamanians who were tortured or died during Japanese occupation.
d. War Dog Cemetery, Yigo

War dogs were used by both the First Provisional Marine Brigade and the Third Marine Division. Their strong sense of smell and acute hearing made them particularly effective for night security -- men slept more restfully when not actually on watch if dogs were on duty nearby. Sixty members of the war dogs assisted the U.S. Marine Corps in the recapture of Guam. Dogs were also sent into caves; their safe detailed inspection into caves; their safe return permitted scouts to enter for a more detailed inspection. They also worked with the military police to guard installation and patrol trails. At least 23 war dogs who were killed in action, died of wounds, or otherwise lost their life on Guam are buried within an enclosure in the cemetery, each one having a white marker. The war dog cemetery commemorates the role dogs played in saving American lives in the recapture of Guam.

e. General Obata's Command Post, Yigo

Lt. General Hideyoshi Obata, commanding general of the Japanese 31st Army, was forced to stop at Guam when the American invasion of Saipan caught him returning to Saipan from an inspection of the Palau Islands. He left the defense of Guam to Lt. General Takeshi Takashina.

When General Takashina was killed at Fonte on July 28, 1944, General Obata took direct command of the remaining Japanese forces on Guam. He ordered a general withdrawal into northern Guam and set up his command post in a tunnel complex near Mt. Mataguac. On August 10, the day organized resistance on Guam was declared ended by the Americans, the army lost eight men and had 17 wounded in an attack on General Obata's strong point. The next day, the Americans used 400-pound blocks of explosives to seal the cave entrances. Opened four days later, 60 Japanese were found dead in the tunnels. General Obata died during the fighting, perhaps by suicide.

General Obata's command post of interconnected, man-made tunnels within a hill represents the bravery and sacrifice of the Japanese who defended Guam, as well as the expertise of the Japanese Army of preparing underground fortifications on Pacific islands.
f. Agana Tunnels, Agana

Near downtown Agana, in the limestone outcroppings, there is a large complex of interlaced caves with multiple openings. Although typical of many such excavations around Agana and other portions of the island, this particular complex is very easily accessible, contains a number of large rooms with high ceilings, and appears to be little changed since its construction.

9. Properties on the National Register of Historic Places

Prior to authorization of the national historical park, several sites in and near the park were placed on the National Register of Historic Places at the national level of significance. They are as follows:

- Agat Invasion Beach (within park in Agat Unit)
- Asan Invasion Beach (within park in Asan Unit)
- Asan Ridge Battle Park (within park in Asan Unit)
- Hill 40 (outside park near Agat Unit)
- Matgue River Valley Battlefield (within park in Asan Unit)
- Memorial Beach Park (within park in Asan Unit)
- Piti Coastal Defense Guns (within park in Piti Guns Unit)

Considerable additional information has been obtained for specific sites and structural remains as a result of the site survey during the summer of 1979 and data obtained from local residents. The National Park Service is currently reviewing the available data on historic resources and will suggest any necessary changes in the National Register sites.

E. The Park -- Natural Resources

The existence of World War II remains and their settings is the primary reason for the authorization of War in the Pacific National Historical Park. There are, however, important natural resources within the park, both marine and terrestrial, that in accordance with the authorizing legislation must be carefully managed to help ensure their continued protection and potential for interpretation.
1. Geology and Hydrology

Northern Guam is a limestone plateau some 600 feet above the sea. There are no streams but there are springs. The southern half of Guam has a different geological history. A few locations, such as Mt. Lamlam and Mt. Alifan, retain caps of resistant limestone. Most of the remaining topography, however, consists of uplifted volcanic formations that have been subjected to weathering and erosion. Soils are primarily laterite clays.

Southern Guam has many streams flowing from the complex interior topography to the sea and only a few of these are within the historical park. The Matgue and Asan Rivers lie almost entirely within the Asan Units of the park. The Matgue (or Nidual) River enters the sea at the Piti end of the Asan Beach Unit. The Asan River passes through the village of Asan and enters the sea at about the center of Asan Bay.

The Piti, Mt. Tenjo-Mt. Chachao, and Mt. Alifan Units have no perennial streams. The Agat Unit, however, has six streams that flow into the sea through the park's narrow shoreline area. The Namou River, near Apaca Point, has recently undergone channel relocation by the U.S. Army Corps of Engineers for flood control. Flow in all streams is quite low except during very heavy rains when there is potential for flooding.

2. Vegetation

Many areas of the park contain tangantangan (Leucaena), a tropical leguminous tree. It originated in Latin America and was spread through the tropics and sub-tropics as a browse legume for its protein-rich foliage. It is also a source for fuel, shade, charcoal, fences, and for poles. Tangantangan is famous for being pest-resistant and durable under grazing, cutting, fire, and drought.

Although it was present on Guam prior to World War II, tangantangan was selected by the Navy in 1947 for the revegetation of Guam. Guam's hillsides were not recovering from the American invasion of 1944; drought and brush fires had left the mountainsides black and erosion was removing soil. Seeds were collected and mass reseeding was performed from aircraft. There is some indication that after 35 years there are some limestone forest and coastal strand returning to areas almost completely dominated by tangantangan.
The savanna ecosystem, a dry land system dominated by grasses, low shrubs, and small trees, occurs on the western upper slopes of the Asan Inland Unit. It is the predominant vegetative cover on the Mt. Alifan and the Mt. Tenjo-Mt. Chachao Units, although these units do include small areas of ravines and forests. The Mt. Alifan Unit maintains an open grassland character due to frequent burning, which has also led to some erosion problems.

Much of the Piti Unit is covered with tangantangan. The plantation of mahogany, also within the Piti Unit, remains.

Near the site of the Japanese Command Post on Fonte Plateau, there is an excellent example of native limestone forest on the ledge comprising the viewpoint for northern Guam. Native vegetation also extends down the slope both toward the north and into the quarry.

Recent information from the Guam Coastal Management Program has designated a small area near Apaca Point in the Agat Unit as part of the Namo River floodplain and classified as wetlands.

The Guam Department of Agriculture has listed the plant species as endangered under the endangered species act of Guam (see Appendix F). They are also recommended to be on the Federal Endangered species list.

3. Animal Life

Primarily because of its long history of human habitation, its size, and its topography, there are few endemic vertebrates on Guam. Dominant terrestrial animal species consist of insects and small reptiles, although a number of native avian species and an indigenous species of gecko are known to exist.

A list of threatened and endangered animal species on Guam has also been prepared by the Department of Agriculture (see Appendix F). These have all been recommended by Guam for Federal status as rare and endangered.

Freshwater aquatic habitats are generally divided into two types. Lentic habitats are associated with slow-moving or stagnant water, such as ponds, lakes, swamps, and marshes. Lotic habitats are in flowing water, such as springs, streams, and rivers. Only lotic habitats are present in the historical park. The lower portions
of the two small rivers in the Asan Unit, Asan and Matgue, have been affected greatly by surrounding development and little of their resource integrity remains. The short sections of stream in the Agat Unit lie within or are adjacent to urban development and likewise retain little of their original character.

4. Marine Biology

Two units of the park, Asan Beach and Agat, have extensive water acreage. These offshore areas encompass large coral reef ecosystems and associated marine biological resources that will be a significant consideration in future management and use.

Two species of sea turtle, the Green and Hawksbill, are protected under both local and Federal endangered species acts. They are also found in the park's offshore areas.

The Asan Beach Unit includes the shore and reef flat from the seaward end of Adelup Point westward along the village of Asan, including Asan Bay to the west of Asan Point at the Matgue River, and seaward to Camel Rock (Gapan Islet). The shore from the area of the Asan River to Asan Point is mainly a man-altered, artificial coastline. Here, a coral boulder fill encloses a shallow area on the reef to the east of Asan Point.

The coral community dominates the Asan Unit waters. Seagrass (Enhalus acoroides) is found in widely scattered patches east of Adelup Point. Corals are widely scattered to abundant in the low-tide moat along the inner reef flat. The densest corals are found immediately west of Adelup Point and seaward of the raised coral headland. Abundant areas of soft corals are found west of Asan Point.

Although no systematic collecting has been carried out along the Asan Unit, a wide variety of invertebrates has been observed, especially sea cucumbers, sea urchins, and sea stars. Fiddler crabs (Uca) have been collected along the sandy beach at the Asan River mouth.

The Agat Unit, extending from north of Rizal Beach to the south of Bangi Island, and the intertidal beaches at Rizal Beach, Togcha Beach, and Salinas Beach to the south are composed primarily of bioclastic material. Some volcanic detrital debris is especially common near the mouths of the numerous streams which enter along the coast. Low limestone cliffs with sea-level coral
boulders border Apaca Point south of Rizal Beach. The sewer outfall peninsula at Gaan Point is the only artificial shoreline in the park. Sea walls and a slightly altered shoreline also occur at Rizal Beach.

Four offshore island groups (Pelagi Islets and Yona, Bangi, and Alutom Islands) are bordered by low limestone cliffs and sloping shores.

The major community throughout the entire Agat Unit is the seagrass (Enhalus acoroides) community. Rare at the north end near Rizal Beach, seagrass becomes more abundant in the low-tide moat which begins at Apaca Point. Southward the seagrass increases, especially seaward of the Togcha River and Bangi Point. Corals are widely scattered throughout the Agat Unit, being more abundant in the low-tide moat. Only a few corals are found on outer reef flats except for those in small holes and depressions. A wide assortment of invertebrates and fish is known to inhabit the unit.

The reef flat at Rizal Beach is composed mainly of coral rubble. The alga Padina tenuis is prominent and sponges (Cinachyra australiensis) are scattered. Many gastropods are present as is the sea urchin Enchinometra mathaei.

South of the Pelagi Islets, the reef flat pavement becomes substrate for animals such as the sea cucumber (Holothuria atra), sea urchin (Echinometra mathaei), and a few crustaceans. A number of gastropod species has been observed. Further south the shore is littered with domestic trash, and the ghost crab (Ocypode ceratophthalmus) is found. At the north side of the peninsula at Gaan Point, the snail (Cerithium moras) is found in great abundance.

F. Potential Recreation Use

Guam has very limited land and an increasingly large and more urbanized population. As a result, opportunities for outdoor recreation, especially along the shoreline, become more valuable and the demand for their use becomes greater. Lands within the national historical park contain considerable potential for satisfying local recreation needs. This potential is important when consideration is given to providing for such use within the context of the park's historical preservation and natural resource management objectives.
1. **Asan Units -- Beach and Inland**

The Asan Beach unit is immediately adjacent to the village of Asan and easily accessible from the island's major population center in the Agana vicinity. There is excellent potential for family-oriented beach activities, space for picnicking, and open space for community activities, such as large fiestas.

Asan Bay itself provides opportunities for fishing and food collection on the reef. Snorkeling in the bay, however, would be very limited because of the shallow water on the reef itself and the hazards of a steep dropoff and unpredictable currents at the outer edge of the reef.

The Asan Inland Unit has opportunities for hiking from the summit of Nimitz Hill to Marine Drive. Trails could follow stream beds, pass through a variety of plant communities containing native Guam plants, and could be a feature of the park's historical interpretation.

2. **Piti Guns Unit**

There is limited recreation use potential in this small area. Local residents climb the hill to see the historic guns and to stroll through the mahogany grove. This same pattern of use is seen as the primary use for the future.

3. **Mt. Tenjo-Mt. Chachao Unit**

This unit also would have very limited recreation potential; however, hikers could enjoy the spectacular views along the ridge between Mt. Tenjo and Mt. Chachao.

4. **Mt. Alifan Unit**

Here also, there is little, if any, potential recreation use except for informal walks.

5. **Agat Unit**

This is the other unit in the park with considerable recreation use potential. The level coastal area and beaches are immediately adjacent to the community of Agat so that picnicking, fishing, food gathering on the reef, and occasional boat launching are traditional uses. The outer reef is also an interesting area for snorkeling and scuba diving. The presence of World War
II equipment adds greatly to this potential. In addition, snorkeling in deeper parts of the reef flat and along the reef edges is quite good.
III. SPECIAL INFLUENCES ON MANAGEMENT

A variety of unique influences on administration and management of historic, natural, and recreation resources has been given careful consideration in preparation of a general management plan for War in the Pacific National Historical Park. Some involve legal restrictions and others relate to local attitudes and conditions.

A. Legislative

The authorizing legislation for the park, Public Law 95-348, includes several specific directions and requirements.

1. Parklands are set aside to "conserve and interpret outstanding natural, scenic and historic values and objects."

2. The Secretary of the Interior may make minor revisions in the park boundary.

3. Other historic sites on Guam, relevant to the park, may be identified and marked in cooperation with the Government of Guam.

4. To the extent possible, interpretation will be in English, Chamorro, and Japanese.

5. The Secretary is authorized to negotiate for berthing and interpretation of a World War II naval vessel.

6. It is required that the park employs and trains residents of Guam and the Northern Mariana Islands to the maximum extent feasible.

7. No fee may be charged for entrance or admission to the park.

8. The National Historic Preservation Act of 1966, as amended and as supplemented by Executive Order 11593, placed all National Park Service operations under the procedures of the Advisory Council on Historic Preservation. The entire War in the Pacific National Historical Park is on the National Register of Historic Places, and six specific sites are individually listed on the Register. It is expected that additional individual sites will be placed on the Register as a result of the recent survey on historic remains completed in 1979.
9. Title VIII of Public Law 95-625 authorizes the park to provide some sort of recognition of the contributions of the late Congressman William M. Ketchum of California toward the needs of people of insular areas.

10. Section 6(h)g P.L. 95-348 requires the Secretary to study additional sites in the Pacific associated with World War II. It is recognized that there may in the future be some additional sites administered by the National Park Service. That study is regarded as a separate issue, however, perhaps requiring additional Congressional action. As such, it will be a potential for the future, but not a part of this particular planning effort.

B. Tourism and Tour Patterns

The tourist industry on Guam is comparatively new, having started in the sixties. Two significant aspects of this important part of the island's economy have an effect on the park.

1. Many local residents see the tourist as a source of money and not as an intrusion into their way of life, although some may have more concern about the effects of tourism in recent years.

2. About three-quarters of the visitors are Japanese, and almost all of these are in tour groups traveling by bus.

In addition, many Japanese died in the battle for Guam and elsewhere in the Pacific. Recent discussions with representatives from Japan indicate that Japanese visitors are interested in some type of memorialization of their war dead.

C. Related Planning Efforts

For a number of years the Army Corps of Engineers has been studying alternative sites for a small boat harbor in the Agat vicinity and there has been considerable local support for such a facility. The Corps has conducted feasibility studies of several locations south of the Agat Unit of the park, after deciding not to pursue a location within the park because of the historic preservation laws and National Park Service policies. The current proposal is for a site adjacent to Nimitz Beach, south of the Agat Unit.
A project, studying alternatives for flood-proofing Asan Village, has also recently been completed by the Corps. Specific actions have been proposed, which have what was judged the least effect on the historic scene in the Asan Beach Unit. This project has gone through due process including environmental review.

The Territorial Department of Parks and Recreation provides facilities for some water-oriented shoreline recreation activities and many athletic programs. It is expected that there will be a concentration on provision of recreation use. The National Park Service will generally be more involved in preservation and interpretation, but it is expected that Territorial parks will also continue their efforts in historic preservation.

The Guam Housing and Urban Renewal Authority is in the process of rehabilitating the village of Asan under a grant from Housing and Urban Development. This urban renewal project is surrounded by the Asan Unit of the park and part of the proposal is to place all the land on the ocean side of Marine Drive in open space. This same shoreline area, also part of the historical park, has both residences and commercial development. Delays by the Federal Government in land acquisition in this area are creating problems with many landowners in the park, with local public relations, and in working with the Government of Guam.

The Bureau of Planning, an agency of the Government of Guam, completed an islandwide plan several years ago. The plan seeks to promote an orderly land use pattern for Guam and provide for increased development when appropriate. The historical park is recognized as an accepted part of the future planning for the island, and it has been assumed that park land would be owned in fee by the Federal government.

D. Special Conditions

Guam, being a tropical island and far removed from other land forms, possesses some climatic and physical characteristics that require special consideration in preparation of a general management plan. Design and location of structures, resource management, and visitor use should be planned with concern for the following factors:
1. Structures and facilities must be designed to withstand typhoon winds of up to 200 miles per hour, or be so constructed that they are inexpensive to replace.

2. Mildew in this warm, humid climate causes damage to supplies, equipment, records, etc. Air-conditioning is needed for protection in some areas, such as storage and some exhibits, and dehumidifying devices may be required in other instances.

3. Flooding of shore areas results from wind-generated waves during intense storms, and low valleys may be flooded following heavy rainfall. This suggests careful location and design of facilities.

4. Erosion of soft volcanic soils is widespread and results from torrential rainfall on land where vegetation has been removed. Careful planning and site preparation are required to avoid this.

5. Corrosion of metal equipment, World War II artifacts, and other objects is accelerated by warmth, humidity, and salt air. This suggests special curatorial precautions for maintenance.

6. The grassland savannas and tangantangan thickets are highly flammable during the dry season and many fires are man-caused. Unless checked, the resulting denuded land is susceptible to severe erosion. This is a particular problem in the upper part of the Asan Inland Unit and in the Mt. Alifan Unit.

7. Guam has some of the highest electrical costs in the world because of its small population and total dependence on oil-fired generators.

8. In planning for family-oriented recreation facilities, special consideration will be given to the unique social patterns and customs in Guam. Outings to beaches and picnic areas involve not just a single family of three to five persons but more often are large family gatherings of 10 to 20 or more persons.
IV. DESCRIPTION OF THE PROPOSAL

The General Management Plan for War in the Pacific National Historical Park essentially constitutes a series of proposals that will provide a national park unit similar to other historical areas on the United States Mainland. There are also some elements of the proposal, such as recreation facilities, that are designed to respond to local recreation and cultural needs. In addition, there are specific legal requirements included in the park's authorizing legislation as described in Section III of this document that must be satisfied.

The following description of individual elements of the proposal has been divided into three sections: (1) proposals for boundary changes; (2) proposals for interpretation and resource management, which includes historic preservation; and (3) proposals for development and use. All combine to satisfy the primary purpose of the park -- to commemorate the bravery and sacrifice of those participating in the Pacific Theatre of World War II and to conserve and interpret outstanding natural, scenic, and historic values and objects on the island of Guam for the benefit and enjoyment of present and future generations.

A. Land Needs and Boundary Changes

In order to adequately satisfy the requirements of the authorizing legislation and provide areas for development of the facilities, it is assumed that some lands within the authorized boundary will have to be acquired through purchase, donation, or exchange. In addition, it is proposed to alter the boundary in certain locations to include recently discovered historic remains, to exclude those lands considered unnecessary, and to refine the boundary where administration might otherwise be awkward.

The individual boundary changes are described by park unit and shown on accompanying maps. Acreages indicated are only approximate and it is only with a proposed boundary survey that the precise size of these areas can be determined. Such a survey, which should include all existing park boundaries and proposed changes, is considered a high priority project.
1. Asan Beach Unit

Several concrete bunkers lie just outside the existing park boundary along the coast on the east side of Adelup Point. It is proposed to adjust the boundary in this area by adding approximately nine acres to include these historic remains and to provide an area for development of visitor use facilities near Adelup School. (See Detail Map following page 35.)

2. Asan Inland Unit

Hiking in the upper elevations of this unit will be an important feature of the park's program for interpretation and use. In order to provide for public access, parking areas, and interpretive exhibits, it is proposed to add approximately 6.5 acres in the vicinity of the World War II field artillery piece found during the recent survey of historic remains. Additional space (about 2.5 acres) for parking and a viewpoint along Spruance Drive overlooking Asan Bay is also proposed. One other small addition of about one-half acre along the lower boundary is proposed to include the base of the slope near the Asan River to provide for a trail construction easement. Two small parcels along the lower park boundary are proposed for deletion. They total approximately two acres and will become part of the village of Asan.

3. Japanese Command Post at Fonte Plateau

This proposal would add one more unit to the park. An area of about 38 acres along Spruance Drive adjacent to Nimitz Hill includes the cave complex used by General Takashina, an overlook for interpretation of the battle for northern Guam, a historically important basin above the quarry, and an interesting, local plant community near the overlook and below the crest of Nimitz Hill. There is also space for parking and interpretation.

4. Piti Guns Unit

The major problem here is access and parking and no additional acreage should be needed for that purpose. However, a small addition of no more than one acre is proposed to provide a buffer between the guns and the village of Piti.
PROPOSED BOUNDARY CHANGES

ASAN, PITI GUNS AND FONTE PLATEAU UNITS

War In The Pacific National Historical Park
5. Mt. Tenjo-Mt. Chachao Unit

The boundaries on this 51-acre unit are proposed to be expanded to include the actual summit of Mt. Tenjo, the historic features adjacent to an existing primitive road, and a small parcel to include a portion of the road formerly excluded. They total about 30 acres.

6. Mt. Alifan Unit

The existing shape of this unit creates some administrative problems because of its complexity. Proposed boundary changes are designed to add lands for an access road from Agat and to exclude those lands not needed. Area added would total about three acres and 29 acres would be excluded from the boundary.

7. Agat Unit

Proposed refinements in the Gaan Point vicinity will consolidate open space on the shoreline side of Marine Drive, protect the setting of the invasion beaches, and help preserve the existing cemetery for the community of Agat. Specifically, proposed changes include deleting a small shoreline parcel behind the Agat community center, deleting the inland part of the parcel between the sewage plant and the cemetery, adding a narrow coastal strip between Finille Creek and Bangi Point, and adding the ridge of rocky land south of the existing cemetery. In addition a small area of public land in Old Agat would be added to provide public beach access. About 8.9 acres would be added to the park and 3.5 acres would be deleted.

B. Resource Management Proposals

It is proposed to concentrate on preservation and interpretation of historic resources. However, it is also proposed to manage each unit in a slightly different manner depending on the character and concentration of resources and their relation to each other. Management proposals are identified separately for each unit.

1. Asan Beach Unit

This unit is likely to receive the most visitation. Proposals include the following:
PROPOSED BOUNDARY CHANGES
MT. CHACHAO / MT. TENJO UNIT
War In The Pacific National Historical Park

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PROPOSED BOUNDARY CHANGES
AGAT AND MT. ALIFAN UNITS
War In The Pacific National Historical Park
a. Preserve, maintain, and interpret historic remains mainly at Asan and Adelup Points (see map on page 12 for location and type of resources).

b. Identify and protect historic remains in the offshore area. This will entail further research and onsite surveys.

c. Retain the large level area near Asan Point as open space. This lies behind the invasion beach, but there only two minor World War II historic sites extant.

d. Plant the shoreline with coconut palms and other plants previously found here to restore the historic scene and help screen park developments. Control or remove tangantangan at or near historic structures and use areas.

e. Restore the damaged reef area near Asan Point to resemble its natural state. This means removal or re-grading of the existing visually intrusive reef berm near the shoreline.

f. Remove all existing residences along the shoreline. This includes about 17 structures.

g. Further protect reefs and inshore waters by controlling or minimizing siltation from erosion and stream flow.

2. Asan Inland Unit

This largest and thickly vegetated unit is proposed to remain in its current primitive state except for one major overlook on the top of Nimitz Hill and a trail system (see map on page 12). Use is proposed to be very light. Historic features are proposed to be marked and stabilized. Native vegetation will be encouraged by controlling or removing plants such as tangantangan.

3. Piti Guns Unit

The primary resource is the Japanese coast defense guns, perhaps the best preserved remains in the park. It is proposed to continue to preserve these remains, control or remove tangantangan, and preserve the mahogany grove, a secondary resource.
4. **Mt. Tenjo-Mt. Chachao Unit**

This unit is proposed primarily as a platform for views of Apra Harbor, Orote Peninsula, and Agat Beachhead, all part of the story of the battle for Guam. It is proposed to stabilize historic features and maintain the open grassland environment.

5. **Mt. Alifan Unit**

Even though this has the greatest concentration of historic remains in the park, access is inconvenient and remains are fragile and easily damaged or removed (see map on page 17). Specific management proposals include identifying and removing historic remains that are either small enough to be carried away or potentially dangerous, and maintaining the open grassland character as much as is practical.

6. **Agat Unit**

There are numerous historic features in this unit but the land base is small and fragmented in small parcels (see map on page 17). The proposals for management recognize this by:

a. Retaining the historic character of the beach, offshore area, and the small islets, which will include restoration of the shoreline in the vicinity of Gaan Point to pre-invasion appearance;

b. Preserving individual remains and their immediate surroundings;

c. Removing introduced plants such as tangantangan and planting coconut trees and other historically appropriate plants, and restore the landscape to pre-invasion appearance in so far as it is feasible;

d. Identifying and preserving historic remains in the offshore area which entails further research and onsite surveys;

e. Preserve wetland habitat near Apaca Point.

7. **Fonte Plateau Unit**

This park unit is proposed to be managed for two purposes: (1) to preserve the tunnel used by General Takashina (see page 14 for description) and its physical setting (not including restoration of the landscape of
the adjacent post-World War II quarry), and (2) to preserve the native plant community on the slopes below the potential overlook (see page 14 for description).

C. Proposals for Additional Needed Data

Considerable data has been gathered as part of the preparation of the general management plan. However, more detailed information is to be obtained as part of the plan in order to provide a basis for more detailed planning and management of the park's resources later. These include:

1. Additional data on oral history that will add to general historical knowledge as well as provide information on restoring the historic scene.

2. Boundary surveys to determine and monument the park boundaries and to locate more precise boundaries for proposed additions and deletions.

3. Additional historical and attitudinal data from Japanese historians on the war and the battle for Guam.

4. Survey the park's underwater areas to date and identify World War II remains and natural features and potential for an underwater trail. Some information is already available, but more data will be needed for detailed management and interpretive programs.

5. Additional data on marine resources to determine whether or not there should be controls on fishing or food gathering to ensure the resources are not unduly depleted.

6. A park-wide Historic Resource study, including more detailed field surveys of parklands to identify additional historic sites or objects.

7. Archeological excavation of certain caves, tunnels, and other sites connected with the battle for Guam.

8. A study that will identify an appropriate scope of collections for World War II equipment for the park. This should also consider the cost of maintenance.

9. A more detailed interpretive plan for the park—one that reflects the most recent data on resources and use and considers the feasibility of including berthing a World War II vessel as authorized.
D. Proposals for Park Use and Development

War in the Pacific National Historical Park will attract visitation and use from two distinct groups of people. Each group has its unique needs and the plan proposes different types of facilities to satisfy those needs. The larger group will be the off-island visitors, predominantly Japanese, who are usually in organized tour groups. There will also be a much smaller number of "Stateside" visitors and those from other countries. Generally, this means a somewhat structured tour which retains its group character to a much greater degree than tour groups from the Mainland. It is expected there will be considerable interest in sites associated with Japanese military operations and those suitable for memorializing the war dead. Japanese visitors also usually show a high interest in nature and natural history.

The second, much smaller group of users will consist of local residents. Most of these will be persons residing in villages immediately adjacent to the individual units of the park, such as Asan, Piti, Agat, and Santa Rita. Residents from other communities and U.S. military personnel on active duty on Guam can also be expected to visit the park occasionally. Generally, they will be visiting the park as individuals, families, or other small groups. Their primary focus on most visits will be the park's natural resources and recreation opportunities. Activities such as picnicking, fishing, boating, and other informal recreational uses will predominate, especially among the local Chamorro population. It is felt that this second group of visitors is most likely to utilize trails in the park.

As is the case with management proposals, each unit in the park has its own unique character and potential for use and development. The following discusses each of these units, identifies proposed uses and facilities, and identifies who will probably be the predominant users. Facilities discussed in this section are shown on the maps depicting each unit.

1. Asan Beach Unit

It is proposed that this unit will be the major concentration of visitor use in the park. Uses for off-island visitors will include interpretation of the entire Pacific war and its background, and viewing the invasion beach and remains of bunkers, and other remnants of the
battle for Guam. It is proposed that local residents will utilize the large open space near Asan Point for picnicking, fishing, informal games, and for occasional large gatherings and special ceremonies. It is also proposed to continue Asan village’s traditional annual commemorative service for those who died in the invasion.

Proposed development will include the following facilities:

a. About one mile of road and parking for a maximum of 175 vehicles;

b. An interpretive structure at or near Asan Point and outdoor exhibits;

c. Landscaped open space in the large area previously occupied by the Naval Hospital Annex;

d. Picnic and beach recreation facilities, along parts of the shoreline to accommodate groups of about 25-30 persons;

e. About one mile of trails and walks leading from roads and parking areas to significant historic remains and overlooks at Asan and Adelup Points;

f. Water, sewer, and power connecting to available existing systems immediately adjacent to the inland park boundary;

g. Exhibit of World War II equipment at a site between Asan Point and Marine Drive, convenient to the interpretive facility.

h. A visual barrier, such as a berm and vegetation, along Marine Drive.

2. Asan Inland Unit

It is proposed that the primary use by off-island visitors be limited almost entirely to the overlook and interpretive exhibits along Spruance Drive; they can view much of the unit from this overlook and from the interpretive areas in the Asan Beach Unit. The opportunity for hiking will also be provided, and it is expected that this will be used primarily by local residents. There will also be interpretation of natural and historic features. A list of facilities to satisfy these needs and areas for park administration follows:
a. Trails totaling about three miles through the large roadless area;

b. An overlook and interpretive exhibit with associated parking for 30 vehicles;

c. A parkwide administrative and maintenance facility on the level area inland from Marine Drive and adjacent to the west end of Asan Village.

3. Fonte Plateau Unit

Major use of this unit will be by off-island visitors, who will stop at the proposed overlook and at the cave where General Takashina had his last command post. Local residents, particularly school groups, are expected to visit the botanical area on the slopes below the overlook. Proposed development includes three parking areas, each providing space for 15 vehicles and serving the cave vicinity, the overlook and the botanical area. Total length of access road to these facilities will be about a half mile. All three locations will have interpretive exhibits and walks or trails totaling about a mile in length.

4. Piti Guns Unit

Visitor use in this unit will consist almost entirely of off-island groups spending a short time at the historic guns and perhaps taking a short walk through the mahogany grove. Normal use by local residents, mostly from Piti, is expected to consist of an occasional visit to the guns and the grove. Proposed facilities include parking for about 15 vehicles and a graded trail to the guns through the mahogany grove. Interpretive exhibits are also proposed for this unit.

5. Mt. Tenjo-Mt. Chachao Unit

Very little use of this unit by off-island visitors is expected. Rather, it will appeal to those who have the time and inclination for hiking to take in the excellent views available. Local residents will probably be the primary hikers. Proposed facilities include an overlook and interpretive exhibit and parking for 10 cars. In addition, a 1.5-mile trail following the existing road route will terminate at Mt. Tenjo where there will be another interpretive exhibit.
PARK DEVELOPMENT
AGAT AND MT. ALIFAN UNITS
War In The Pacific National Historical Park
6. Mt. Alifan Unit

Light use, primarily by local residents, is expected in this unit and will consist of informal walks or hikes along constructed trails. Facilities proposed include a short access road (a third- to a half-mile), a parking area for a maximum of 50 vehicles, and a small interpretive exhibit. A trail about one and a half miles long leading to major historic remains is also proposed.

7. Agat Unit

Except for the Asan Beach Unit, Agat is proposed to be the major concentration for off-island visitors and the most prominent locations for interpretive facilities will be Gaan Point and Bangi Point. This unit also provides an excellent opportunity for beach- or shoreline-oriented recreation primarily by Agat residents.

Appropriate activities would be boating, fishing, beach recreation, scuba diving, snorkeling, and picnicking. Proposed facilities include the following:

a. Interpretive exhibits at Bangi Point, Gaan Point, Apaca Point, Rizal Point, and Finile Creek.

b. Parking areas for interpretive exhibits and for access to shoreline recreation providing for a total of around 150 vehicles.

c. Access roads to parking and overlooks totaling a maximum of one mile.

d. Trails and walks to historic remains at Bangi Point and Island, Gaan Point, Apaca Point, and Rizal Point totaling about one and a half miles. An underwater trail will be developed if considered feasible.

e. Expanding the existing picnic area and other existing facilities at Apaca Point (which is proposed to be a primary recreation area).

f. Coordinating NPS planning with the Guam Department of Parks and Recreation in its planning efforts on adjacent lands.

g. Removing the recent shoreline fill and the sewer outfall peninsula at Gaan Point to restore the original shoreline.
h. Picknicking, beach access, and use of the traditional boat launching area will be prohibited in Old Agat.

E. Proposals for Historic Preservation

In accordance with the park's authorizing legislation and National Park Service policy, it is proposed to preserve in place all historic structures in the park associated with World War II. This will be accomplished through preservation maintenance and very limited stabilization. This would include about 30 pillboxes and other concrete structures, four artillery pieces in place and 10 or more caves. It is also proposed to maintain as nearly as possible the historic character of the battle areas, primarily keeping them in open space with limited development and use.

Specific sites and structures will be preserved in accordance with the Secretary of the Interior's standards for historic preservation and rehabilitation of historic structures, the National Park Service's management policies on cultural preservation, and cultural resources management guidelines.

During future detailed planning, design, and formulation of park administrative policies, management will consult with the Territorial Historic Preservation Officer on compliance with the 1966 Historic Preservation Act and the 1980 revision of that Act.

F. Other Administrative Needs and Proposals

In addition to proposals for boundary changes, management, and development, the general management plan includes several special proposals that satisfy legal requirements or needs unique to Guam.

1. Legislation authorizing the historical park provides a maximum of only $500,000 for park development. The construction estimate for all park facilities is included in the appendix of the general management plan and should be used as a basis for introducing a change in the current authorized development ceiling.

2. The legislation also directs that the park employs and trains residents of Guam or the Northern Mariana Islands, insofar as feasible, and the practice already begun in hiring the local park staff will be continued. Offering special training programs for staff members of the other governments in Micronesia is also
proposed. The specific details of this program will be covered in more detailed documents and as a result of continued discussion with local governments.

3. Part of the Guam Housing and Urban Renewal Authority's project in Asan village is improvement of the domestic water system. A storage tank is proposed on parkland just above the village, located and designed to be as inconspicuous as possible. This can be accomplished by proper design, careful location to minimize intrusion on the historic and natural scene, and by the use of screen plantings.

4. The Asan redevelopment project also requires provisions for releasing floodwaters through the Asan Beach Unit. It is proposed that drainage structures and channels be designed in a manner that will have minimal impact on the historical setting and on recreational use of the Asan Beach Unit.

5. Except for one small, informal boat launching area, there is no public access to the shoreline between Apaca Point and Gaan Point. It is proposed to study and, if feasible, locate several public access points in this vicinity. Public land will be used when possible and private land will be purchased and added to the park only if absolutely necessary.

6. It is proposed to manage grassland savannas and tangantangan thickets throughout the park by removal and control of natural fire. This is important in that it proposes a change from the traditional use of man-induced fires.

7. Public Law 95-348 provides that additional historic sites on Guam may be identified and marked by the Secretary of the Interior. Page 19 of this document includes descriptions for six of these sites. Other sites can be marked as they are identified and analyzed in the future. These six sites -- Tweed's Cave, Father Duenas Execution Site, Camp Menengon, the War Dog Cemetery, General Obata's Command Post, and the Agana Caves -- are proposed to be marked and interpreted in cooperation with the Territorial Department of Parks and Recreation. Access trails and parking are planned to be in convenient locations for visitors and financed as part of the national historical park's construction program. Precise location, design, and length of roads and access walks or trails require more detailed planning. It is estimated that the total development will include the following:
a. Six interpretive exhibits;
b. Six access roads totaling not more than two miles;
c. Access trails to each of the six sites totaling not more than two miles;
d. Six parking areas providing for a total of 60 cars and 10 buses.

8. A memorial to the late Congressman William M. Ketcham will be installed at an appropriate location in the park.

9. Guam is isolated from the mainland states to such an extent that administration, development, and management in accordance with typical mainland historical parks may not always be appropriate. It is particularly important that all future planning and management programs be closely coordinated with local Government of Guam agencies and with affected communities, their commissioners and their citizens.

10. It is proposed that there be no hunting in the historical park. The primary reason for this is that the units are too small to accommodate hunting and other uses such as hiking and appreciation of historic features. Some are also within or very near urban developments. Moreover, it has long been the policy that there be no hunting in National Parks.
V. ENVIRONMENTAL CONSEQUENCES OF THE PROPOSAL

A. Historic Structures, Remains, and Historic Scene

Since one of the primary objections of the park is to preserve historic remains and the historic scene, that will be a primary consequence of the actions proposed in the general management plan. This impact entails preserving structures and artifacts. But it also includes the historic landscape that existed just prior to the American invasion. This does not mean literal "restoration" of the landscape but rather the removal of post war structures and a limitation on development to maintain an open character to the landscape along with replanting of specific species of plants that existed in those areas prior to the invasion.

A recognized negative impact on the historic scene will be the proposed visitor center parking and associated developments at Asan Point and in the vicinity of the Matgue River. To a lesser degree there will also be a negative impact on the historic scene at Mt. Alifan as a result of proposed developments at the trailhead. These negative effects will be minimized by building placement, design, and carefully selected plantings that will be in keeping with the historic character of the sites.

B. Vegetation and Soils

If all features of the proposal are implemented, approximately 200 acres of introduced vegetation, primarily tangantangan, will be removed to encourage the natural growth of native plants. A small part of this area, about 10 acres adjacent to facilities, will be planted with native species. In addition, a total of approximately three miles of shoreline will be intensively planted with coconut palms and other appropriate plant species.

Of the area disturbed by facilities, about 10 acres will be permanently occupied by structures, parking areas, roads, and other associated facilities. In addition to specific facilities, approximately 100 acres at the Asan Beach and Agat Units will be maintained as mowed grass areas. The entire Mt. Alifan Unit (132 acres) and the Mt. Tenjo/Mt. Chachao Unit (84 acres) will be managed as natural savannah except for the small areas devoted to facilities, historic preservation and interpretation (total area about 1-2 acres).

All construction activity for roads, parking areas, buildings, and trails will be restricted to the smallest area possible, particularly in areas where native vegetation predominates (Asan Inland Unit, Fonte Plateau Unit, Mt.
Alifan Unit, and Mt. Tenjo/Mt. Chachao Unit). Where areas are disturbed, it is anticipated that with the wet tropical climate revegetation will begin within months of the completion of construction. The primary concern will be the control of introduced species such as tangantangan. This introduced plant will be controlled and/or removed in many areas of the park, particularly around public use areas and historic structures and sites. The result will be that much of the park acreage will be cleared of tangantangan. The amount of land cleared will be addressed in more detail in the resource management plan. In addition, information for the details on plant re-vegetation will be obtained from the Guam Department of Agriculture and the University of Guam.

There is no known impact on the species of plants identified in this document as potentially threatened.

C. Marine Resources

Implementation of the proposal will have no major impact on marine resources within the boundaries of the park. However, there will be some minor impacts:

1. The previously altered reef structure near Asan Point will be returned as nearly as possible to its natural state by re-grading the coral material near the shoreline where it is currently a visual intrusion.

2. Proposed construction of facilities and the resulting temporary clearing of vegetated areas may cause minor erosion of soils which could result in siltation deposits on the reef structure near stream mouths. The completion of construction, however, along with the proposed planting projects and control of fires, will eventually reduce the deposit of silt on reef structures. Thus, the overall effect of the proposal on inshore marine resources is expected to be positive since it will reduce erosion and siltation.

In order to mitigate the potential soil erosion as much as possible the Guam Erosion and Sediment Control regulations will be followed. These regulations are administered by the Guam Environmental Protection Agency.

3. Proposals to study impacts and possible controls of fishing and food collecting on the reef will help ensure the continuation of marine biotic communities for recreation use and as a continuing source of food.
4. The proposals for further historic surveys to search out underwater World War II remains will have negligible impact on marine resources. It is expected that the same will be true for any proposals for preservation or maintenance of underwater historic remains.

Although not specifically a marine resource, the potentially endangered reef egret, which inhabits shore and reef areas, is not affected by the proposed actions.

D. Water Resources

Construction of park facilities will have negligible impact on water resources. Much of the historical parklands are along the shoreline, where there would be little or no effect on water resources. Likewise, the Mt. Tenjo/Mt. Chachao Unit, although inland, is too small to have any appreciable effect on watershed areas or water resources.

Management proposals for the Asan Inland, Fonte Plateau and Mt. Alifan Units will have some positive impact on watershed areas in that nearly all parklands will remain in open space and the soils and plant communities will be maintained.

With its greater land area, changes in elevation and varied plant cover, the Asan Inland Unit is the most significant example of watershed protection.

The overall effect of the proposals on water resources is considered to be minor but positive, particularly with respect to preservation of watershed lands.

E. Social and Cultural

Most of the social and cultural impact resulting from the proposals relates to the Chamorros and the effects of the proposed actions on them, and the impact of proposed purchase of lands on the current owners and residents.

The use of the Chamorro language in interpretive programs, as required by the park's authorizing legislation, is considered to have a positive effect. It should promote greater pride in the Chamorro culture and help encourage the continued everyday use of the language.

Preservation of the complex of World War II remnants in their setting will also have a positive cultural or social impact on residents since Guam will be the only place where the U.S. will have preserved and interpreted such resources onsite.
Guam is somewhat isolated from the U.S. Mainland, and concepts that are commonly accepted by most Americans may be new to most residents of Guam. National parks and the policies of preservation of natural and historic features and their surroundings are excellent examples of such concepts. A national historical park that seeks to preserve and interpret historical and natural features will provide a model for Guam and other areas in Micronesia. The impact is considered positive in that eventual acceptance of preservation and conservation concepts could lead to greater interest in local issues involving the environment.

The proposals in the general management plan will encourage visitation to all seven units in the park. Much of this will be in the form of organized tour groups.

There will be some negative impact on adjacent communities as a result of increased traffic and the frequent presence of tourists within quiet local communities. This will be most pronounced at Agat and Piti, but some impact will also be felt in Asan. These negative impacts can be partially mitigated by location and design of facilities so that they are physically separated from the community as much as possible. However, even with these measures there will be some negative effects from continuing traffic and presence of park visitors.

It is proposed to acquire all private lands (about 55 tracts) within the authorized park boundary in fee. This will require the displacement or relocation of 12 persons in the Agat Unit, 68 persons in the Asan Beach Unit, and 31 persons in the Asan Inland Unit, as well as several business establishments in the Asan Beach Unit. Such relocations can result in considerable negative impact on individuals and families involved. This negative impact can be only partially mitigated by purchasing properties with willing sellers first.

A positive impact of the proposed plan relates to continuation of traditional offshore and shoreline uses such as fishing and picnicking. These uses will be further encouraged by provision of convenient facilities. This is expected to result in a positive social impact.

The overall impact of the proposal on local culture is considered to be positive as it will increase the awareness of history. Negative impact is caused by numerous visitors in the units adjacent to small communities and by relocation of several families. These can both be mitigated to some extent.
F. Economic

Since the proposal includes construction of facilities and interpretive programs for off-island visitors, there will be some impact on the island's economy.

It is expected that nearly all of the over 250,000 off-island visitors will visit at least one unit of the park during their stay on Guam. Such visits will extend the current average length of stay thereby increasing hotel occupancy periods and the amount of money introduced into the local economy. Interpretive programs will also broaden the visitor's experience and to a small degree stimulate more visitation to Guam. The amount of both increase in length of stay and in numbers of visitors, however, is nearly impossible to estimate at this time since the park is so new. Thus, the specific impact on tourism and the economy is at best a general estimate and must remain that way until more data is available.

Construction of new park facilities (buildings, roads, parking, picnic areas, and interpretive exhibits) primarily would be accomplished by local contractors, thereby producing a positive impact on the economy. This would be a one-time occurrence, but would likely stretch over a period of 5 to 10 years. As estimated in the General Management Plan the total cost for construction would be about 14 million dollars.

A continuing cost of resource management, control of exotic plants, such as tangantangan will provide a small but more permanent or continuing positive economic impact. The level of this impact, however, is not known at this time and will be assessed more accurately as the program proceeds.

An additional recurring cost will be for staffing and maintenance. This infusion of money will have a positive effect on the local economy, both direct and indirect.

One possible negative impact of the proposal could result from restriction of commercial fishing in the park's waters. This is, however, considered to be minor since a very small part of Guam's adjacent waters would be affected by this restriction.

There would be one other impact that could be considered negative, particularly by some local interests. Much of the parkland, specifically in the Asan and Agat Units, is adjacent to urban development. The fact that it is proposed to remain as open space and undeveloped prevents its being developed for residential or commercial uses. In addition, its public land status removes it from the tax rolls. It is
estimated that approximately five percent of the park or 120 acres is potentially developable.

The economic impact of the proposal is expected to be generally positive as it will stimulate and support the fast-growing tourist industry on Guam. It must be recognized, however, that this is based on very limited information related to a new park and an evolving visitor use pattern. Negative impact is associated with removing lands from the tax rolls and preventing development for commercial and residential uses within the park.

G. Summary of Impacts

The major environmental consequences resulting from the proposed actions relate to the development of park facilities, to proposed management practices, and to effects on the local economy. There will be a total of 50 acres of land disturbed by development; about 35 acres will remain as developed area and about 15 acres would be planted or returned to a natural state. An additional 35 acres will be planted and maintained in a natural state along Asan and Agat Invasion Beaches. Management practices will concentrate on maintenance of open space, prevention of fires, and restoration of prewar landscape, mostly along the shoreline. Economic impact involves positive effects on the local tourist economy and on the construction industry.

The primary negative impacts resulting from the proposed action involve construction of interpretive and administrative facilities. The most apparent is the interpretive facility at Asan Point.

In addition, the major purpose of the park will be realized -- preservation and interpretation of the World War II remains. This will include physical remains in-place, artifacts, and the appropriate settings for these resources.

Some negative impacts are related to displacement of residences on properties to be purchased within the park. Additional negative effects result from delays in purchasing from willing sellers.

The remaining impacts are considered to be relatively minor. These involve reduction of siltation and protection of the coral reef environment at Asan and Agat Bays.
VI. RELATIONSHIP OF THE PROPOSAL TO OTHER PROPOSALS, PLANS, AND APPLICABLE LEGISLATION

During preparation of the alternatives and the proposal as presented in this document, consideration was given to several applicable Federal laws and related planning efforts. The following discussion covers these and the consideration given them in preparing the proposal.

A. Historic Preservation Act and Executive Order 11593

Seven sites in and near the park are on the National Register of Historic Places and also under the procedures of the Advisory Council on Historic Preservation. Recent field surveys and proposed future research may identify additional sites. The General Management Plan recognizes the existing sites and potential additional sites in the resource management proposals. Moreover, it is recognized that future research may require reconsideration of some elements of management and use programs.

B. American Indian Religious Freedom, part of Public Law 95-341

This provides that American Indians and other cultural groups endemic to American lands shall not be denied access to religious sites or the freedom to worship through ceremonial and traditional rites. War in the Pacific National Historical Park includes several sites significant in Chamorro culture, but no known rites or ceremonies are associated with these sites.

The general management plan provides for traditional uses unique to Guam, such as fiestas and other large gatherings. In addition, the proposal includes a site to be used by Asan village for the traditional memorial service for those who died in World War II.

C. Rare and Endangered Species Act, Public Law 93-205

There are no known species of plants or animals in the park that are now listed on the Federal rare and endangered species list. As noted on pages 24 and 25, however, there are several species included in a list of potentially threatened plants and animals. The proposal as it is now written includes management practices designed to protect native biological communities and, where possible, encourage the growth of native plants to replace introduced species.
None of the actions proposed will have any adverse effect on the potentially threatened species of plants and animals.

D. Coastal Zone Management Plan

Guam's Final Coastal Zone Management Plan is dated July 1979 and was prepared by the Bureau of Planning in Agana. The plan includes, among other things, areas of particular concern throughout Guam and refers to the national historical park with boundaries essentially as authorized in Public Law 95-348.

Among the areas of particular concern, only the coral reef areas identified include lands or offshore areas within the park. Even here, none of the reef areas within the park are considered to be pristine marine communities.

It is determined that there are no conflicts between the general management plan and the coastal zone management plan nor are there any conflicts between the coastal zone management plan and any of the alternatives considered. Moreover, even though Federal lands are excluded from CZM regulations, Executive Order 78-20 directs that Federal actions must be consistent with local CZM regulations. Mechanisms and review procedures, including the Guam Bureau of Planning, are in effect that will ensure cooperation between the Federal government and the Territory of Guam on this issue.

E. Land Acquisition Plan

This is a document prepared by the National Park Service and reviewed by local communities on Guam. It identifies all land within the park to be acquired and proposes a system of priorities for acquisition. There is no conflict between the land acquisition plan and either the proposed action in this document or the alternatives to that action.

F. Redevelopment Plans For Asan Community

The Guam Housing and Urban Renewal Authority has prepared a redevelopment plan for the Asan community. This plan, to be financed by Federal funds and administered by Housing and Urban Development, was prepared in consultation with the National Park Service. All lands on the ocean side of Marine Drive in Asan are proposed as open space by both the National Park Service and the Guam Housing and Urban Renewal Authority. There are no known conflicts between the proposals of the National Park Service and the Government of Guam.
G. Proposals by the U.S. Army Corps of Engineers

Previous planning by the Corps of Engineers identified Gaan Point within the Agat Unit of the national historical park as the recommended site for a small boat harbor. Discussions among the National Park Service, the Corps, the local community, and the Government of Guam surfaced a number of concerns:

1. The Historic Preservation Act, Executive Order 11593, and the existence of a national historical park would not necessarily prevent construction of a small boat harbor at Gaan Point, but would require extensive review and consideration by the Advisory Council on Historic Preservation and other Federal agencies.

2. The local community and the Government of Guam were in favor of constructing a small boat harbor and were willing to accept the recommendations by the Corps of Engineers. The primary concern, however, was to satisfy the need for boat launching and harbor facilities in the Agat vicinity.

3. The National Park Service was strongly opposed to construction of a boat harbor within the historical park.

After further consideration and discussion with all concerned, the Corps of Engineers has been studying alternative sites for a boat harbor in the Agat vicinity, but outside the historical park boundaries.

H. Flood Hazard Areas

The U.S. Army Corps of Engineers has also identified flood hazard areas throughout Guam. All proposed permanent developments in the park are outside this hazard area except the proposed visitor center at Asan Point. Mitigation measures include possible minor relocation and design of the structure to minimize potential flood damage.
VII. ALTERNATIVES CONSIDERED AND THEIR ENVIRONMENTAL CONSEQUENCES

During preparation of the proposals in this general management plan, a number of alternatives was given consideration. They were discussed with the local communities, representatives of the Government of Guam, other Federal agencies, and within the National Park Service. The following discussion separates these alternatives into categories relating to park boundaries and to various concepts for park management, development, and use.

A. Alternatives for Park Boundaries

1. No Change in Park Boundaries

Public Law 95-348 authorized a national historical park with specific boundaries as indicated on the map on page of this document. A no-action alternative for park boundaries would entail accepting the park as it is in the authorizing legislation and preparing management and use plans on this basis.

The environmental consequences of this no-action alternative on park boundaries relate primarily to historic preservation and to development of facilities. There are no known proposals for alternative administration of any of the historic remains on lands adjacent to the park by the Territorial Government or others. Since each unit has different problems regarding boundaries, the environmental consequences of no action will be discussed for each individual unit.

a. Asan Beach Unit

With no change in the boundary, the recently discovered Japanese fortifications on the east side of Adelup Point would not be preserved or interpreted. In addition, the boundary on the west side of Adelup Point would be so close to the shoreline and the historic remains that there would be little or no buffer zone between the park and the schoolground and there would be very limited space for trails or walks and interpretive facilities.

b. Asan Inland Unit

With no change in boundary, it would be very difficult to provide public access to the recently discovered 75mm mountain gun near the upper park boundary at the east end of this unit.
Near the west end of Nimitz Hill along Spruance Drive, it would be almost impossible to provide parking for the historical park’s major overlook if the boundary remains as it is.

There are three minor problems with the boundary near the west end of Asan village and the east end of Piti:

(1) approximately one acre of level, potentially developable land lies within the existing park boundary adjacent to the village of Piti;

(2) the current boundary near the west end of Asan village does not permit access between two minor park areas because of steep terrain;

(3) there are about five homes on Government land just inside the park boundary on the upper side of Asan village and if the boundary remains as it is, the families occupying these homes would need to be relocated.

c. **Fonte Plateau Unit**

The current park boundary includes no land in this vicinity. No action here would mean that the site of the last Japanese command post on Fonte Plateau would not be preserved or interpreted. There would also be no location in the park from which the battle for the northern half of Guam could be visually interpreted. In addition, there would be no protection or interpretation provided for the nearby botanical area. There are no known alternative proposals for administration or interpretation of these resources.

d. **Piti Guns Unit**

The existing boundary comes very close to one of the historic Japanese guns. No action would result in little or no buffer between the historic resources and the adjacent residential development.

Two small areas in the park are adjacent to the existing residential development and near Spruance Drive. No action here would result in a minor management problem since these two half-acre parcels are not needed for park use and are potentially usable by local residents.
e. Mt. Chachao/Mt. Tenjo Unit

The existing boundary in this unit has several problems. Part of the summit of Mt. Tenjo is excluded. Part of the existing road (a potential trail location) is outside the boundary and most of the recently discovered historic remains are also outside the park boundary. No changes here would result in several management problems, as there would be no protection for historic resources and it would be more difficult to develop and interpret this unit.

f. Mt. Alifan Unit

No action on the park boundaries in this unit would produce a variety of results.

Deleting the proposed addition of a three-acre parcel near Agat Junior High would result in a park access problem. There are no known alternative access routes that would not require heavy construction scars and use of quiet residential streets.

Two additional parcels of land totaling about 24 acres contain no significant historic remains and do not physically relate to this unit. Their retention in the park would tend to complicate management since they are superfluous to any known park needs.

g. Agat Unit

All land in this unit is along the beach. The results of no action on boundaries relate almost entirely to complicating park management. The south bank of the Namo River would be excluded. A small parcel of land near the Agat community center, which is in reality part of the community center development, would be managed by the park.

The existing Catholic cemetery adjacent to the park has little room for expansion, but there is some suitable, flat land available between the existing graves and the sewage disposal plant. The property on the Bangi Point side of the cemetery is rocky and not suited for cemetery use. Thus, no action on the boundaries here would have the effect of leaving some church-owned land in open space, probably little used, and undeveloped for public use as well as leaving very little suitable land for expansion of the cemetery.
The narrow strip of beach front just north of Bangi Point is currently outside the park boundaries. No change in the boundary here would mean that the land would likely remain in open space since it is too narrow for residential or commercial use. It would also likely continue to be used as it is now -- informal beach recreation on private land, but with no development, no management, no clean-up of debris, and no planting or control of undesirable plants that have been introduced.

h. Summary

The overall effect of no change in the park boundaries is considered to be negative. Some historic sites related to World War II and significant natural features would remain outside the boundary and no alternative plan for their protection is known to exist. Two excellent overlooks important to historical interpretation would be difficult or impossible to develop. In addition, the park would continue to contain lands judged to be unnecessary to its purposes, thereby creating management problems.

2. No Action on Boundary Survey

The general development plan for the park currently includes a proposal for a boundary survey. The effect of no action on this part of the proposal is considered to be entirely negative. Numerous management problems would develop since the precise location of the boundary in many areas is not known or is not identified on the ground if it is known. Such indefinite boundaries also have the potential for disputes with adjacent landowners and local communities.

3. Alternative Park Additions and Deletions

During preparation of the proposals in this document, a number of alternative boundary changes were studied. The following discussion identifies these and their impact by unit:

a. Asan Beach and Inland Units

Alternative boundary changes in these units relate primarily to simplifying management.
(1) Piti Bay Deletion

Asan Point and the ridge leading to Marine Drive provide a logical physical boundary for the park. Thus, the shoreline and offshore area east of Asan Point are physically and visually part of the Piti village shoreline, none of which is in the park. An alternative proposal would be to exclude much of this offshore area and a section of the shoreline east of Asan Ridge from the park.

The impact of this alternative relates almost entirely to management. Much of the adjacent shoreline is administered by the Guam Department of Parks and Recreation and the shoreline excluded from the park could become part of this shoreline recreation area. The effect on management of the historical park would be negligible since there are no historic sites or structures in the area considered for deletion from the park. In addition, the land and water acreage is so small as to have little impact on management of the total park.

(2) Opop Deletion

This is a group of privately owned land parcels totaling about 25 acres. The owners of these parcels requested that their lands be deleted from the park in order that private residences might be constructed. There are currently no improvements on any of the property.

The impact resulting from this boundary change would affect three entities or organizations -- the community of Asan, the landowners themselves, and the national historical park. There would also be impact on the physical environment.
ALTERNATIVE BOUNDARY CHANGES
ASAN, PITI GUNS AND FONTE PLATEAU UNITS
War In The Pacific National Historical Park
The lands in the alternative proposal are adjacent to and above the community of Asan, which is currently undergoing urban renewal based on plans prepared by the Guam Housing and Urban Renewal Authority. Construction of previously unplanned residences at the edge of a carefully planned community would have a negative social impact because it would result in high-cost housing within a community comprised almost entirely of middle- and low-income families. It is proposed to limit residential development to that considered topographically suitable. Development of these parcels would require new access roads over very steep terrain and probable removal of at least one existing residence. The effect on the community from the added traffic as a result of new residential development is judged to be negligible.

The impact of this alternative on the owners of the parcels is considered to be largely positive in that they would be permitted to develop their land for residential use, assuming approval of local permits and adherence to the overall island plan.

The impact on the historical park is judged to be negative. Much of the land is part of a high, relatively flat area above the Asan community and in full view from the park's most important historic overlook on Nimitz Hill. The parcels in question would also form a visual intrusion into what is now the largest park unit. Moreover, the current boundary encompasses what is judged to be a logical area for administration and public use. The only known positive impact on the park is economical. Deletion of these lands would mean that less money would be required to purchase parklands.

(3) **Flag Circle Addition**

This is an area of approximately 40 acres lying between the upper boundary of the Asan Inland addition and the top of Nimitz Hill in the vicinity of the flag officer's residential area. The land is Federally owned and administered by the Department of the Navy. There are no known historic remains, but the area is part of the Asan beachhead battleground.
The impact of this alternative is related almost entirely to park management. The edge of the plateau adjacent to Flag Circle is an easily identifiable boundary. All the remaining open land in the Asan area is national historical park. Addition of this parcel would create no new management problems for the park. It is also significant that by not adding this land to the park, there would be little effect on management since it is unsuitable for development due to the steep topography, in addition to the fact that the Navy plans to continue to manage it as open space. As parkland, however, it may be managed more intensively to control introduced plants and encourage the regrowth of native species.

b. Piti Guns Unit

Two alternative boundary changes were considered for this unit. Both are associated with an alternative public access road to the Piti guns. One addition of about five acres would provide land for construction of an access road from Marine Drive; the nine-acre deletion would remove a parcel of land adjacent to Spruance Drive. If the access road from Marine Drive through the village were to be constructed, this land would no longer be needed in the park since its purpose is to provide land for the proposed access road.

The effect of this alternative would be that the access road could be built from Marine Drive. However, the access road would bisect the village, possibly creating a traffic problem, increasing noise levels, and presenting a roadway to be crossed by village children going to school. The village planning council was very much opposed to this alternative.

Effects on park management and interpretation are considered negligible, since there are no known historic features that would be affected.

c. Mt. Chachao/Mt. Tenjo Unit and Mt. Alifan Unit

There were no additional alternative boundary proposals for these units other than those mentioned in the previously described "no action" alternative.
d. Agat Unit

Near Rizal Point, one minor boundary deletion was considered as an alternative. This alternative would place about three acres of land under management by the Guam Department of Parks and Recreation.

The primary effect is on management. There are no historic sites on the property, but it is used for informal recreation similar to an adjacent unit of the Territorial Parks System. Management by either a Federal or Territorial Park agency would not create any major management problems.

e. An Alternative New Unit -- Hill 40

This alternative was part of several previous park proposals. The area encompasses about 15 acres of Hill 40 and some adjacent land. This site was important in the early days of the battle for Guam, but in accordance with the site survey of 1979, there are no historic remains.

The impact of this alternative has both positive and negative aspects. Inclusion of this significant historic site would broaden the park's resources base and would provide another site for interpretation; however, it should be noted that Hill 40 could also be interpreted offsite.

The impact on the Agat community would be entirely negative. About five tracts of private land would need to be purchased and a few families would be relocated. The impact on park management would also be primarily negative.

Hill 40 has been considerably altered and is now completely covered with tangantangan. To make it interpretable and useful for any anticipated public use, it could be cleared but would remain substantially altered from its World War II appearance.
ALTERNATIVE BOUNDARY CHANGES
AGAT AND MT. ALIFAN UNITS
War In The Pacific National Historical Park
B. Alternatives for Park Management, Development, and Use

1. No Action

This alternative represents the least action possible under the requirements of the park's authorizing legislation. It can be summarized under four areas of responsibility:

**Historic Preservation:** All sites and historic remains would be allowed to continue their present state of deterioration and no stabilization or restoration work would be done.

**Interpretation:** There would be no formal interpretative program or signs. All units, however, would be available for public use.

**Development:** Although the Park would be open to the public, there would be no development for interpretation, roads, trails or recreation facilities. The only development would be that needed for protection of historic sites and remains.

**Management:** Management and administration would be minimal -- only that needed to preserve and protect historic resources.

The impacts of this alternative affect many facets of land use, recreation, historic interpretation, and economics, as described below:

-- The cost of operating and maintaining the park would be a fraction of that needed for proposed actions -- probably one-fourth of that cost or less.

-- With regard to the appearance of the park, it would continue as undeveloped open space, with little or no control over the introduced plant species. Historic remains would be accessible, but most would become almost completely hidden among dense plant growth.

-- Since there would be no formal interpretative program, tour companies would likely provide their own publications and information about the Pacific Theatre of World War II and the related sites on Guam. It is expected that visitation would be lower, probably half of what the park would have if the proposals were implemented.
Local recreation use of the park’s beaches and shorelines would likely continue but at a much lower level than that expected with the proposal. More important, concerning this recreation use, is the probable impact on historic and natural resources. With no specific provisions for shoreline use, use that does occur may cause inadvertent damage to park resources because it will scatter along all parts of the shoreline including on and around historic and natural features. Perhaps most important is that the park shoreline has been used in the past for recreation. The fact that no facilities are provided will not only not prevent use but will result in more damage to park resources because of lack of control over where use occurs.

Historic resources, although preserved in their present state, would deteriorate more quickly since there would be no formal stabilization program. Also, since management would be minimal there would be more chance of vandalism.

In summary, it is considered that the overall effect of the "no action" alternative would be negative. The significant resources would receive inadequate protection, interpretation would not meet the standards set by the National Park Service, and the recreation potential of the park's shoreline would not be realized.

2. Alternative Development Proposals

During preparation of the general development plan, several alternative proposals were given consideration. The following discusses these alternatives by individual park unit.

a. Asan Beach Unit

The vicinity of Asan Point was considered for several alternative developments and levels of development.

The least amount of development considered was for an overlook, a small interpretive exhibit, and parking area. The primary impact of this alternative would be the small area disturbed by development (less than one acre). The remainder of Asan Point would be undeveloped open space. Visitation would be less and visitors would remain only a short time, probably 10 to 15 minutes. In addition, the visual impact from the development would be minimal when viewed from the high-elevation overlook along Spruance Drive.
Another alternative would be to add the park administration/maintenance facility to the Asan Point development. The major impact would be to about one acre of additional area which would be disturbed. There would be a greater visual impact both for visitors to Asan Point and for those viewing the Asan beachhead from the overlook along Spruance Drive. Park management would be simplified and slightly less expensive since nearly all operations would be administered from one area and facilities could be consolidated.

b. Asan Inland Unit

Two alternative development proposals were considered here.

The Matgue River administrative site would not be built in accordance with one alternative. The area would remain in open space. No development other than a trail head and a small parking area was considered.

The Asan Bay Overlook along Spruance Drive was given serious consideration as the park's major interpretive center. Development would include parking for about 30 cars and five buses, a major interpretive structure, park administrative facilities, and a trailhead. The most apparent effect would be the greater size of the development -- major structures at what is probably the park's finest overlook. Development of the facilities would require disturbance of not more than two acres. Park management would be substantially affected by this alternative since the facilities would be located some distance from major maintenance or patrolled areas. Visitor use patterns would change considerably. There would be much greater use of Spruance Drive for tour buses and visitors would remain longer.

c. Piti Guns Unit

An alternative access route and parking area was considered for this unit, leading from Marine Drive, near its junction with the road to Apra Harbor, through the village of Piti and up to a small, flat area just below the guns.
Physical impact would involve about two acres of land disturbed for the paved road and parking. The predominant effect, however, would be on the village itself. Traffic, buses, and cars would pass through a residential area and would cross the usual access to the local public school. It would not be necessary to relocate any residences, but the village planning council in 1980 felt strongly that this otherwise quiet neighborhood would be seriously disrupted.

The cost of construction is not considered to be greatly different from that in the preferred proposal.

d. **Fonte Plateau Unit**

No alternatives have been given serious consideration for this unit.

e. **Mt. Chachao/Mt. Tenjo Unit**

Early planning for this unit included a low-standard road leading from Mt. Chachao to Mt. Tenjo and two small parking areas for up to 10 cars each. This alternative, if implemented, would increase visitation to this small unit, since both overlooks would be accessible by car. It would also require disturbance of about six to eight acres for paved road and parking area construction; about half of this area could be returned to natural cover.

f. **Mt. Alifan Unit**

An alternative for visitor access and parking was considered for this unit. The road would lead from the village to Santa Rita near the grade school to the western boundary of the park. Parking for 10 to 15 cars and buses would be immediately inside the park boundary.

The total area disturbed by road and parking area construction would be about one acre, about half of which would be outside the park boundary. The major impact, however, would be on the community of Santa Rita. Access would be by a somewhat indirect route from Route 2 through the quiet, residential part of the village and there would be some chance of visitors getting lost. The flow of traffic through such a small village and near a school is considered to have a negative impact.
g. Agat Unit

Several alternatives for development were considered during preparation of plans for the Agat Unit. Among these were a major league ball diamond at Gaan Point, possible construction of a small boat harbor at Gaan Point by the U.S. Army Corps of Engineers, a satellite maintenance facility at Bangi Point, and a launching ramp somewhere between Bangi Point and Apaca Point. None of these were considered to be viable alternatives because of the limited space available and the conflict with the underlying purpose of the park and the Historic Preservation Act.
VIII. CONSULTATION AND COORDINATION DURING PREPARATION OF THE DRAFT ASSESSMENT

A. Coordination With Other Public Agencies

During all steps of the planning process, local and Federal agencies were consulted in order to obtain advice and comments on plans for management and use of the historical park. Generally, the issues discussed related to the unique interests of each specific agency.

1. Guam Housing and Urban Renewal Authority (GHURA)

Since this agency has prepared an urban renewal plan for Asan village, its interest in the general development plan was concerned with the Asan Inland and Asan Beach Units. Specific issues were as follows:

   a. Refinement of park boundaries, especially those on the upper side of the village. Coordination resulted in a common boundary between Asan village redevelopment and the historical park.

   b. Location of water storage reservoir for Asan village. Consultation with GHURA located a reservoir site within the park that would minimize visual impact.

   c. Design of floodwater drainage through parkland into Asan Bay. This was coordinated with the U.S. Army Corps of Engineers since the Corps designed several alternative drainage systems. Coordination resulted in a design for more than one outlet to Asan Bay thereby minimizing impact on the historic scene.

2. U.S. Army Corps of Engineers

The primary concern was the proposal for a small boat harbor at Gaan Point in the Agat Unit of the park. This was somewhat controversial at both the local and Federal levels, but resulted in the Corps studying alternative sites for a boat harbor outside the historical park.

The Corps was also involved in preparation of floodwater channels through the Asan Beach Unit, as discussed under coordination with GHURA.

3. Guam Department of Parks and Recreation

The agency administers all other public recreation lands on Guam as well as recreation programs. Frequent
discussions with the staff assisted in determining local recreation needs and desires. Some territorial park units lie immediately adjacent to or very near the historical park boundary and this coordination was an aid in developing park use concepts, particularly for shoreline areas.

Staff archeologists and their crews assisted in locating and identifying historic sites in and near the historical park.

4. Territorial Historic Preservation Officer

The planning team worked closely with the THPO during the entire planning process and territorial park staff assisted in gathering basic historic data. In addition, the THPO reviewed and commented on early drafts of the document to ensure compliance with historic preservation laws and regulations.

B. Coordination With Local Communities

Consultation and coordination with local residents included two types of contact. Informal discussions with village commissioners at Piti, Asan, and Agat helped identify and clarify issues regarding park management and use and the possible effects on local communities.

The second kind of contact was accomplished through two series of meetings, one in March 1979 during the early stages of planning and the second during June 1980 when the draft general development plan was being reviewed. The primary results of these series of meetings were changes in the plan to respond to specific local concerns. Major changes were as follows:

Asan: Opening up Asan Beach to local use and provision for a traditional local memorial service for World War II dead.

Piti: Change in the location of the proposed access road to the Piti guns to avoid going through the village.

Agat: The boundary was changed to accommodate cemetery expansion and community center recreational needs. Proposals for beach recreation facilities to accommodate unique local needs were incorporated.

A summary of all public meetings is included in the appendix of this document.
IX. CONSULTATION AND COORDINATION DURING PREPARATION OF FINAL ASSESSMENT

As discussed in Section VIII of this document coordination with other public agencies and with local communities was an important part of preparation of the draft plan. This coordination has continued as an essential part of the review, which has resulted in revisions and clarifications in the final General Management Plan and its Environmental Assessment.

Additional clarification of the final document resulted from a brief review period during which those who had commented on the plan had an additional opportunity to clarify their concerns and provide other comments. A discussion of this final review and a response to additional correspondence is included at the end of this section of the assessment.

A. Coordination with Other Public Agencies

Part of the review of the draft General Management Plan included review by Territorial and Federal agencies. The following is a point by point discussion of each letter received and indications of where changes were made in the document as a response to these comments. Copies of the letters are included in the appendix of this document.

1. Government of Guam, Department of Parks and Recreation, Historic Preservation Officer

Comment: Not all cultural resources have been identified, for example, submerged features.

Response: The comment is correct. For the purposes of the General Management Plan, it was considered that sufficient historical data was available. It is recognized, however, that more surveys are needed to properly manage and interpret the park. In the plan under "Additional Data Needed" there is a listing of the studies proposed. The item on underwater surveys has also been clarified.

Comment: The plan does not adequately discuss restoration and preservation of historic features.

Response: Some clarification of National Park Service policy on historic preservation has been added to the resources management section of the plan. In addition, however, the General Management Plan does not treat this subject in great detail.
Rather a separate Resources Management plan will discuss these issues in greater detail and like the GMP will be reviewed in similar manner.

Comment: The proposed interpretive facility at Asan Point, the administrative facility at Matgue Valley, and the facility at Mt. Alifan appear to have an adverse effect on the park.

Response: We agree. These adverse effects were recognized during the planning process but perhaps not adequately discussed in the assessment. A statement concerning those adverse effects has been added to the document under "Environmental Consequences of the Proposal." In addition, discussion of alternative sites for developments is included in the document under "Alternatives Considered and Their Environmental Consequences."

Comment: The plan and environmental statement do not discuss the alternative of restoring the historic scene.

Response: Some clarification on the subject of "restoration of the historic scene" has been added in several places in the plan. In essence the plan proposes to restore the shoreline of the park to its pre-1945 condition insofar as this is feasible. Moreover, as further noted, much of the remainder of the park will remain primarily as open space with minimal development, a condition in most cases similar to its pre-battle condition. Some additional planting of appropriate plant species behind the shoreline is also part of the plan. This is considered to satisfy the preservation goal of a national historical park.

2. Government of Guam Department of Parks and Recreation (Second letter dated October 19)

A general response to this letter would be appropriate because it includes a number of excellent suggestions that will be of great assistance in administering a national historical park on Guam. This is particularly important to recognize since some of the specific suggestions are not related to issues usually covered in a GMP. Thus, the general nature of the following responses attempts to work within the general planning concepts. The suggestions in the letter are greatly appreciated.
Comment: There is concern about the role of the State Historic Preservation Officer (SHPO). He should have an active role in planning, be introduced to visiting National Park Service (NPS) officials and be in frequent communication with NPS.

Response: We agree. Even though it is recognized that it is not an issue that can be completely settled in the GMP. It is, rather, an important element in continuing management of the historical park.

Comment: The park's authorizing legislation stipulates that residents must be considered for park staff positions, and that the NPS assist in training individuals for these positions. No cooperation from the general public on Guam can be expected if this law is not implemented.

Response: We agree. The specifics, however, as noted in the GMP, will be part of more detailed management plans which are actually underway and will require continued liaison with local citizens and government agencies.

Comment: There are errors in the sites stated and in some dates in the GMP. Specific comments are provided by the Department of Planning and by the Marianas Recreation and Park Society.

Response: The specific errors pointed out in other responses have been corrected. (See the comment and response sections for Department of Planning, MRPS and others.)

Comment: Interpretation should be realistic, with emphasis placed on depicting war scenes rather than a display of individual artifacts.

Response: These kinds of details are more appropriately part of the park's interpretive prospectus which is now in the early stages of preparation. The information and suggestions will be made available to those preparing the prospectus.
Comment: Measures should be taken to protect underwater resources and the NPS should coordinate with Government of Guam agencies.

Response: We agree and this is the intent of the GMP. To further emphasize this a statement has been added to the document under "Special Administrative and Management Proposals."

3. Lt. Governor Joseph F. Ada (Chairman, Guam Clearing House)

This letter recommends conditional approval of the GMP pending reconsideration of the matter of lands as indicated by the comment below.

Comment: It is strongly felt that the lands for the park should be purchased outright with Federal funds, and not exchanged for Federal surplus properties on Guam.

Response: This concern on the part of the Government of Guam relative to the manner of acquiring park land will be considered as part of the Land Protection Plan. This is a separate plan document required by the Secretary of the Interior (April 1982). The plan will deal with (1) the identification of methods available for assuring that historic, cultural, recreational, scenic, natural, or other significant resources are protected and (2) the providing of adequate visitor use. This plan will be prepared with public participation. The method of acquiring interest in lands is not usually considered a part of the GMP. Information on the Government of Guam's position on this matter, however, will be an important part of the more detailed planning involved in the preparation of the Land Protection Plan.

4. Director, Bureau of Planning, Government of Guam

Comment: A greater concentration of effort should be expended in portraying the one short battle as a part of the Pacific War, even with the geographical discontinuity of the park's units.

Response: The intent of the plan is to do use the battle for Guam as an example of the type of warfare fought throughout the Pacific. Moreover, the primary concentration of interpretive efforts will be in the portraying of that short battle on the sites where it occurred and placing it in the total context of the Pacific War. Some changes made in the text of the report should clarify this issue.
Comment: Even though the park's legislation directs the Secretary of the Interior to train residents of Guam for positions on the park staff, the only residents hired now are groundskeepers. There should be more efforts to employ residents in more positions.

Response: The GMP addresses this issue under "Special Administrative and Management Proposals." In addition, some clarification has been added. As noted, this is a proposal for training more local residents and an important part of this program will be continuing liaison with the local government. A record of persons hired for the park is also included as Appendix C of the GMP.

Comment: Several statements made in the documents indicate lack of intimate knowledge about the Chamorro people and their customs. Specific errors are noted.

Response: The following changes have been made in the document in response to this comment:

- The fact that the Chamorro language includes elements of English and Spanish has been noted.

- A clarification on the use of the term "fiesta" has been made.

- The issue of shoreline picnicking by local residents has been important in the planning for park use and in providing facilities. This has been further clarified in the text and the reasons for the concern for this activity explained. It is assumed that this will satisfy the comment referring to page 40 of the GMP.

Comment: The Environmental Assessment is insufficient for analysis of environmental impact.

Response: Although this comment is not specific as to how the assessment is insufficient, it is assumed that the changes and clarifications made in the document will satisfy the concern expressed.
Comment: The emphasis on the relatively short battle for Guam does not appear to be in keeping with P.L. 95-348 which is to commemorate the campaigns of the Pacific War.

Response: Since the park is situated on Guam there will necessarily be considerable emphasis placed on the battle to retake the island. As noted in the GMP under "Interpretive Concepts," however, the primary themes are intended to relate to and satisfy the legislative requirements. Whether or not this is actually accomplished will depend to some extent on the interpretive prospectus which is now being prepared and a document that will include more detail on interpretative methods and emphasis. This document will also be available for review.

Comment: Since there is already a memorial to Japanese war dead, the park should provide a memorial to all war dead, not just Japanese.

Response: A change has been made in the GMP to reflect this comment.

Comment: Care should be taken to ensure that the contributions, sacrifices, and suffering of the Guamanians during the war is given appropriate emphasis in park interpretation.

Response: We agree and this is the intent of the plan. Review of more detailed interpretive plans by local citizens will ensure that this is accomplished.

5. Director, Bureau of Budget and Management Research, Government of Guam

Comment: There is a need to address Federal land management practices and proposals for land transfer, acquisition and other transactions in a manner that will be of benefit to Guam.

Response: Much of the concern expressed here is not so much a GMP matter but one that will be considered in the development of the Land Protection Plan for the park, scheduled to get under way within the next few months. The intent of the GMP,
however, is to benefit Guam both socially and economically as is noted in the Environmental Assessment. It is important to continue the liaison between Territorial and Federal agencies to ensure that later more detailed decisions satisfy the stated intent in the GMP.

6. Department of Agriculture, Government of Guam

Comment: Find it a thorough and well written document except for seven spelling errors on plant names.

Response: Spelling errors corrected both in the GMP and the assessment.

7. Guam Environmental Protection Agencies

Comment: Restoration of reef areas at Asan Point and Gaan Point may need special measures to minimize situation.

Response: Statements have been added in the GMP under Resource Management concepts to this effect. Specific measures would be spelled out in the resources management plan.

Comment: The Environmental Assessment indicates that erosion will result from construction of facilities. Assurances are needed that adequate measures will be taken at the time of construction to control and minimize erosion.

Response: A change has been made in the text of the assessment to respond to this comment and commit the NPS to take all necessary mitigating measures in accordance with GEPA regulations.

Comment: Removal of tangentangen must be done carefully in order to minimize erosion. There is some concern since the plan does not spell out specifically how this clearing will be done.

Response: Previous removal of tangentangen in the park has involved only small areas at one time and was done by hand removal with no heavy equipment. This approach is intended in future removal projects. The text of the GMP has been revised to clarify this issue.
Comment: The impact of relocating residents at Asan, Piti and Agat seems to be glossed over. It should be at least summarized in the document and the number of families to be relocated should be included along with the number of parcels to be purchased.

Response: The environmental assessment includes the number of residents to be relocated in Agat and Asan under Social and Cultural Impacts. No residents would be relocated in the Piti or in other units of the park. The number of parcels or tracts has been added and a further reference made in the text of the Environmental Assessment to clarify this issue.

Comment: The statement on Guam's water supply being a problem in the near future is somewhat misleading as Guam is currently using less than half the available supply.

Response: The statements concerning water supply on Guam have been deleted since for the foreseeable future it does not appear to be a problem that the GMP needs to address.

B. Private Organizations

Two interested private organizations have also submitted comments. Individual comments and responses follow.

1. National Parks and Conservation Association

Comment: P.L. 95-348 requires the Secretary to study additional World War II sites in the Pacific. The Draft GMP does not refer to this requirement.

Response: The introduction to the GMP (last paragraph) does discuss the fact that the additional sites study will be a separate project and that this document will deal only with the historical park on Guam as currently authorized. For further clarification, however, an addition has been made to the section entitled "Special Influences on Management."
Comment: There should be some ranking of private properties to be acquired by priority in order to ensure that areas needed for the interpretive program are available as soon as it is feasible.

Response: We agree that important historic sites and areas proposed for primary visitor use facilities should be acquired as soon as it is feasible. It is important to note, however, that nearly all major historic resources are already in Federal ownership or Territorial lands to be deeded to the park. In addition, local desires related to land acquisition necessitates some re-structuring of priorities to accommodate specific needs. Finally, there is a more detailed document on land acquisition being prepared. It is entitled "Land Protection Plan" and will undergo reviews similar to the GMP. To further clarify this issue for the GMP itself, a short section on land acquisition has been added and accompanying maps showing the park's ownership pattern inserted as well.

Comment: The NPS interpretive program should determine the tour route for bus tours, not the tour operators.

Response: The intent of the language in the GMP was to indicate that very structured tours would have needs that should be recognized in planning. It was not intended that they dictatethe specific tour route. We do agree, however, that as stated, the document is misleading. The second paragraph under Use and Development Concepts has been revised to reflect this.

Comment: The GMP recognizes special problems in caring for historic objects but does not indicate how the park will cope with (1) a protected site for a museum, (2) climate-controlled facilities to store and display historic objects, (3) preparing a scope of collections and collection preservation guide, and (4) protecting and maintaining historic structures.

Response: These are issues not necessarily discussed in the GMP, but are covered in more detailed planning which has been underway during the GMP review process. Since more information is now available than when the draft plan was completed, we are adding a brief discussion of
these and related issues. In addition, there is an interim museum now established in the park with appropriate climate controls, and a scope of collections and collection preservation guide is being prepared.

Comment: NPS should avoid including high-potential recreation lands in the park and work with the Guam Department of Parks and Recreation to provide for compatible recreation use and development on adjacent lands.

Response: We agree, and this is the intent of the plan. It should be recognized, however, that the very qualities that provide an outstanding recreation beach also are the very beaches used by the invasion forces. Thus some of the prime recreation areas do, in fact, fall within the prime historic areas in the park. A section has been added to the plan explaining in more detail the general concept of recreation development in the park. It is under Use and Development concepts, the fourth paragraph. In addition, the NPS has, for some time, been working with the Department of Parks and Recreation in coordinating development of adjacent shoreline areas for local operation use.

Comment: The NPS should pursue the proposal for a Guam National Seashore to provide protection for some of Guam's beautiful beaches.

Response: The Guam Seashore study has been completed in cooperation with local agencies and review is underway. It is regarded as a separate project from this GMP.

Comment: Sports and other organized recreation have no place in a historical park.

Response: We agree. The type of recreation use proposed for the park is informal picnicking, beach activities and occasional larger group activities, where appropriate.

Comment: Park developments should be designed and located to protect the historic scene and prevent loss of archeological remains.
Response: This also has been the specific intent of the plan. To further emphasize these points, some additions have been made to the GMP and the assessment.

Comment: The NPS and the local residents must cooperate fully if the park is to be successful. The NPS should comply totally with the provision in the legislation that directs the Secretary to employ and train Guam residents for park operation and administration.

Response: The intent to satisfy this legislative requirement is stated in the GMP and some clarification has been added. It should be noted, however, that, as stated in the document, this issue will not be settled in the GMP but must be an integral part of continuing liaison between the NPS and local government agencies and citizens.

2. Marianas Recreation and Park Society

This is a very complex letter of comment with a great deal of attention to detail. There is also some repetition between the text of the letter and specific page by page detailed comments. In order to most adequately and efficiently respond to the entire contents, the following discussion will be organized into several sections related to subject matter and type of comments and suggestions.

General comments in the text of the letter will be responded to specifically when they, in fact, apply to the GMP and a notation will be made if they are not considered applicable.

Suggested corrections of historical fact in the text related to World War II events, will generally not be changed in this document. Additional historic research by NPS historians is currently underway and comments provided in this letter will be helpful to them. This is not to say that historic accuracy is not important. Rather, it is a recognition that changing or correcting some details where more research is underway does not usually have any effect on the actions or management concepts proposed in the GMP.
In the section relating to specific page numbers and paragraphs, there are notes on the copy of the letter in the appendix responding to each individual comment or suggestion. This might be correction of an error, or it may be considered a minor editorial suggestion which may or may not need a change. Where there is a specific suggested change in a proposed section, a response specific to that suggestion will be provided.

Appendix K, which accompanies the letter, lists six recommendations. Recommendations 1, 2, 6, and parts of 4 are all part of standard policy or are clear legal requirements in the park's authorizing legislation. Thus no individual response to these is necessary. The remainder of number 4 will be responded to in the context of other related comments. Concerning number 3, a request for an immediate underwater survey, it is not considered that this is a requirement for completion for the GMP. It will, in fact, be part of the follow-up research as will other management-related research projects. Recommendation number 5 is currently being considered to provide additional opportunity for all those who commented on the plan to assist in its completion. Further information on this will be provided when a definite schedule is established.

Response to Text of Letter

Comment: The legislation establishing important management requirements should be addressed in the beginning of the plan rather than "hidden" under Special Influences on Management.

Response: The sequence of material currently in the GMP is common to many similar documents produced by the National Park Service and other land management agencies. Since there appears to be some concern about the placement of legislation, however, Section 6 of P.L. 95-348 has been placed near the front of the document. The discussion of how this law affects management and planning will remain as part of what is considered by the NPS to be a logical sequence of a planning process.

Comment: The plan does not fully meet the requirements to commemorate the campaigns of the Pacific Theater of World War II.
Response: No specifics are provided on how these requirements are not met. It is, however, thought to be more a function of the Interpretive Prospectus, which is a more detailed document now underway and one that will receive local review.

Comment: This park is the sole NPS unit commemorating the Pacific War.

Response: Reference is made to two other NPS units related to the Pacific War - the Arizona Memorial in Hawaii and American Memorial Park on Saipan. In addition there are numerous remains of World War II fortifications within Golden Gate National Recreation Area in the San Francisco Bay Area.

Comment: The park should commemorate not only battles of the Marianas but other battles in the Pacific, the causes and terrible costs of the war.

Response: We agree and the authorizing legislation authorizes this approach.

Comment: There is concern that there is no background given, nor is there a detailed plan to exhibit a naval ship as required by law.

Response: Four points are important to mention with regard to this comment. (1) The GMP is not considered to be the document to include a detailed study on a subject that appears to be a more logical part of a scope of collections study and interpretive prospectus. (2) A study of available World War II ships appropriate to the park is now underway. This includes among other subjects, the type of ship suitable for interpretation, cost of acquisition (if any), cost of transportation to Guam, cost of restoration, cost of staffing and maintenance, analysis of berthing locations and access, particularly of sites not within the park boundaries. (3) If there is a selection of a specific vessel, the U.S. standard for Historical Nautical Vessels must be followed. A copy of these standards have been added to the appendix of this assessment. (4) The use of the word "required by law" as noted in the comment is in fact incorrect. P.L. 95-348 states that the Secretary "is authorized to enter into negotiations with the Secretary of Defense for the berthing and
interpretation of a naval vessel of World War II vintage which shall be accessible to the public on the Island of Guam."

The GMP does discuss this matter under special administrative and management proposals and some clarification has been added to the text.

Comment: Interpretation is not sufficiently addressed in the plan. Additional information should be given related to more details on how information is provided, types of displays, volunteers in the parks, etc.

Response: Some clarification on this subject has been added to the plan under interpretive concepts. However, the details listed in the letter of comment are regarded as a part of the interpretive prospectus which is now being prepared. The GMP gives only general direction and a framework for more detailed planning and programming.

Comment: Inappropriate interpretation and specific interpretive elements should not be attempted until an interpretive prospectus is completed.

Response: We agree. Current use of interpretive materials is needed to cope with the reality of continuing visitation to the park.

Comment: Concern is noted about the use of the series "Blood and Sands of Guam" for interpretive reference because there seems to be some inconsistency in the series.

Response: This is information that will be very useful to those preparing the interpretive prospectus. The information and the related appendix items are being provided to the appropriate staff members.

Comment: An underwater trail should be included in the GMP with emphasis on submerged artifacts.

Response: Whether or not there should be an underwater trail can be determined as part of further study and planning. The GMP does not preclude such an activity. A brief addition has
been made to the document under "Additional Data Needed" to clarify this.

Comment: Suggest a listing of references, scholar participants and experts consulted for the park be included.

Response: The consultants and participants listed in Appendix A are those directly involved in preparation of these documents. This is the usual method used in preparation of such planning documents. A record of consultation and coordination in this assessment also gives further information on those consulted. In addition, a paragraph on acknowledgments has been added to GMP next to the Introduction.

Comment: No rationale is given for restoration of pillboxes or guns. The Piti guns should be restored as should the coastline near Gaan Point.

Response: There has been some clarification added to the document related to NPS policy and the definition of terms on historic preservation. See the section of the GMP on Resource Management concepts.

Comment: Recommend that the park compose 2 listings of World War II military equipment available for acquisition, including intact Japanese planes in various locations and the Japanese submarine at the Naval Station.

Response: We agree concerning the listing of equipment, and this is being done now as a part of the scope of collections study, not actually a part of the GMP. During the course of this study, decisions may also be made regarding specific available items such as planes and the submarine at the naval base.

Comment: The listing of other significant sites to be marked on Guam is inadequate. Other specific known sites should be included and access studied.
Response: The language in the GMP has been clarified to further emphasize the fact that more sites can be marked in the future as they are identified, verified, and discussed with landowners and local communities. We agree that accessibility should be studied along with feasibility for interpretation.

Comment: There is increasing concern about the legal requirement to hire and train residents of Guam and the Northern Mariana Islands to develop, maintain and administer the park.

Response: This concern is recognized and some of the language has been clarified in the documents to indicate the intent of management. It should also be recognized, however, that the GMP cannot, in itself, satisfy this concern. In addition, a record of hiring for the park has been included as appendix D of the assessment.

Comment: Three sections of the plan (pages 3, 42, and 48) which address the hiring requirement are inconsistent with each other.

Response: These sections have been reviewed and no inconsistency discovered.

Comment: There is concern about the lack of prompt action to purchase land for the park. Exchange is an excellent method for acquisition. Also, the Government of Guam has not acted to transfer its land to the park.

Response: We sympathize with this concern and agree with that exchange is an excellent method of acquisition. Again, however, the GMP is not considered to be the instrument for action but a clarification of intent which would be followed by specific actions. A discussion of land acquisition and land ownership maps has been added to more adequately spell out the acquisition issue.

Comment: Recommend that the Navy owned western slope of Mount Alifan to the top be added to the park.
Response: This was considered early in the study of park boundaries. Since the matter of minor boundary changes can still be an open issue, this information will be provided to NPS historians engaged in the Historic Resource Study as noted in the GMP under Additional Data Needed.

Comment: There is a question on the applicability of the "isolation factor." It seems to imply that off-island contractors would be used for contracts.

Response: The "isolation factor" is a standard consideration in estimating costs for construction and varies depending on location and cost and availability of materials. It has no connection with choosing a contractor. In the case of Guam, local firms would be used whenever possible, since it would be of benefit to both the NPS and the local communities.

Comment: There should be a design motif adopted for the park and development prioritized or phased.

Response: A design motif may be a very good suggestion and has been noted by management and planning as part of more detailed work than can be covered in the GMP.

Comment: A survey of submerged areas should be completed prior to completion of the GMP.

Response: This has been covered in response to general recommendations.

Comment: There is concern that the GMP was not completed within given congressional deadline.

Response: We agree. It is being completed as soon as possible and with an attempt to respond to local concerns.

Comment: Sections on legislative authority should be quoted verbatim to avoid changing the meaning, then expanded on in discussion of implementation.
Response: We agree and this is the intent of the document. Several changes have been made in the document to clarify this. It is, however, common and considered necessary to indicate how legislative language affects planning and management.

Comment: The plan does not mention the proposed drainage ditch at Asan Village which would radically alter the historic scene at Asan Beach.

Response: This decision on the proposed flood-proofing was made in cooperation with the Army Corps of Engineers. It went through due process including environmental review. In addition it was considered to be the least damaging of the alternative flood-proofing measures considered feasible. A reference to this project has been added to the GMP under Related Planning Efforts.

Comment: There is concern that there are no compliance documents relative to Historic Preservation and that the Natural and Cultural Resources Management Plan be subject to historic preservation compliance.

Response: Consultation with the Territorial Historic Preservation Officer on Guam and the Advisory Council on Historic Preservation has been underway for some time. The final documentation on compliance will be printed, as required in the final Environmental Assessment. The Natural and Cultural Resources Management Plan is a more detailed document than the GMP which lays out the general guidelines for resources management. Compliance requirements generally apply to the GMP and then, if any changes are necessary in later documents, these too, are subject to compliance regulations.

Comment: Page one states that the usual public involvement program was not used. There is concern that there should be public involvement in the park.

Response: The statement noted has apparently caused some confusion and has been revised to accurately state what was meant. There was and continues to be considerable public involvement in park planning and management. The unique structure
of Guam's communities and the manner of responding to citizen concerns suggested a different approach in order to ensure that public comment could be heard in a context comfortable to the residents in communities affected by the park.

Comment: The plan does not address staffing and operation costs, memorials or concessions. These should be included.

Response: Staffing and operational costs are not usually in a GMP but the information is available on request. More detail on both these issues is developed after approval of the GMP. There would be no "memorials" except the ones already mentioned in the plan and there would be no concession in the park. Bus tour operations would be handled by commercial use license. Clarification of this is included under Use and Development Concepts.

Comment: There is insufficient discussion relative to recreation in relation to preservation. Recreation use should be allowed but not encouraged to the point of large fiestas requiring large developments.

Response: We agree, particularly, regarding the approach to recreation, and this is the intent of the GMP. This issue has been further clarified in the document under Use and Development Concepts.

Comment: Hunting should be addressed in the plan.

Response: A brief discussion on hunting has been added to the GMP under Special Administrative and Management Proposals.

Comment: Additional study and research should be given visitor use, types of visitors, bus tours and individual tours.

Response: We agree. This is an important part of the Interpretive prospectus and also the resources management plan. The whole issue of interpretation and even management is a matter of evolvement as new information becomes available.
Comment: Many cultures were engaged in World War II in the Pacific. Presentation of events should not be altered to accommodate perceptions of any one culture or society.

Response: We agree.

Comment: NPS should acknowledge more persons that have assisted in this plan and give a listing of study participants.

Response: A comment very similar to this was answered earlier. An acknowledgements section has been added to the plan.

Comment: The plan should address how others will be attracted to the park and develop a program to attract diverse off-island visitors.

Response: The philosophy behind planning for national parks is generally to provide for the visitors who come to the park. "Selling" or "promoting" visitation is not part of such a planning approach. This is more the function of visitor bureaus, chambers of commerce and other community organizations. There is, however, a definite need for providing adequate information on the park for those promoting visitation. This again is part of the function of the interpretive prospectus.

C. Local Citizens on Guam

During the review of the GMP and its Environmental Assessment, four public meetings were held at local communities on Guam:

August 17, 1982 - Agat Village
August 18, 1982 - Piti Village
August 19, 1982 - Asan Village
August 20, 1982 - Agana

The following is a discussion of each of these meetings, individual comments made, and a response to those comments.

1. Agat Meeting (13 persons attending)

Comment: There is particular concern related to the park failing to speedily acquire specific
private properties that are hardship cases. Monies should be spent for these as soon as possible for the land in such areas as parcels at Agat.

Response: The NPS is very concerned about this particular situation. It is not specifically a GMP matter, but it may be helpful to know that the complicated matter of title is now being worked on in preparation for an appraisal of hardship parcels and negotiation with owners, should they be willing to sell.

Comment: An additional tank is needed at the sewage disposal plant adjacent to Gaan Point. The GMP should permit this.

Response: Since the sewage disposal plant is actually outside the park boundaries, there would be no problem with adding the extra tank, from the NPS point of view.

Comment: The Agat-Santa Rita High School, adjacent to the Mt. Alifan Unit needs land for new playing fields but is hemmed in by the park.

Response: The proposed boundary changes in the GMP would delete lands suitable for this use. Land, however, would need to be obtained through GSA when it is excessed.

Comment: The northwest section of Agat cemetery should be deleted from the park.

Response: This should be no problem since it would be accomplished in a major part by proposed boundary changes in the GMP.

Comment: A restroom is needed at Gaan Point because of increasing visitation.

Response: The GMP permits this and detailed planning now underway includes it. (Note the estimate in the appendix of the GMP)

Comment: Fisherman, divers and other boaters need a launching ramp in the Gaan Point area.
Response: This is not currently included in the GMP and may be a problem since it would be both a physical intrusion and could create congestion in this limited area. An alternative may be to provide launching at another site between Gaan Point and the Namo River.

Comment: A road should be opened to a gravel source for Agat Village.

Response: It appears that there may be a potential alignment outside the park and with little or no physical impact on the park. This can be investigated independent of the GMP.

Comment: The utility poles on the beach side of the highway at Agat should be moved to the inland side to restore the historic view of the reef, beach and ocean.

Response: This is an excellent idea and the GMP has been revised to propose it as a possibility.

Comment: A water line should be constructed across the upper end of the Mt. Alifan Unit to provide needed water near Nimitz Beach.

Response: The GMP has been revised to indicate the need for the water line, but also pointing potential problems of visual intrusion and resulting scars. In addition it should be noted that Federal requirements on rights of way on park lands are quite strict as are the regulations in the Historic Preservation Act.

Comment: There is support for providing public beach access at some point between Gaan Point and the Namo River. Public use is fairly heavy and maintenance is difficult.

Response: The idea is good and may solve other problems in the park and the community. A proposal has been added to the GMP for both the addition of a small parcel of land to the park and for appropriate facilities.
2. **Piti Meeting** (13 persons attending)

**Comment:** The park should not adversely affect the people of Piti.

**Response:** The proposals in the GMP are designed to minimize adverse effects on Piti. The NPS agrees with the stated concern.

**Comment:** Existing access to the guns does not have enough parking and the route leads across land owned by the Bishop.

**Response:** The GMP proposes another route completely within park boundaries and outside the village. The proposed addition of land is as a scenic easement, involves only hillside area, and to date there have been on objections.

**Comment:** The environment along the proposed trail is beautiful and people will want to see it.

**Response:** We agree, and this is the intent of the GMP.

**Comment:** The estimate of 25-50 people, per day, visiting the guns may be too low.

**Response:** This is a good point. However, proposed development and use would require a 10-15 minute walk each way for visitors. This could rule out large numbers of people including most bus visitation.

**Comment:** The bridge across the gully should be built of bamboo because it is non traditional.

**Response:** This can be considered in detailed planning, not part of the GMP. It needs to be recognized, however, that local bamboo loses strength, rots quickly, and thus may not be a safe material.

**Comment:** Develop the Pita guns as soon as possible and it is suggested that a concessionaire be allowed to sell beer or other things on site to help pay for maintenance and development.
Response: It would probably not be feasible to combine a concession operation with financing development and maintenance of the park. If, however, someone wished to sell beer or other items outside the park there would be no objection since it would be an independent operation.

3. Asan Meeting (7 persons attending)

Comment: A memorial should be put at the Asan Village memorial area like the Iwo Jima monument in Washington, D.C. Perhaps it could be at the tip of Asan Point as part of primary visitor area.

Response: The text of the GMP has been clarified somewhat on the subject of memorials. Essentially large statues as memorials are not considered appropriate in historical parks. Memorialization is proposed as part of the primary visitor use area at Asan Point, as suggested.

Comment: The oral history program should be done as soon as possible in order to obtain information from older residents.

Response: We agree and the GMP has been revised to reflect this need.

Comment: Asan Village memorial area should be set aside for use by Asan Village because of its tradition.

Response: We agree and this is the intent of the GMP.

Comment: Slowness in land acquisition program is causing problems for Asan residents.

Response: This concern is shared by the NPS, and attempts are being made to solve the problem even within the context of limited funds.
4. **Agana Meeting** (12 persons attending)

Four persons give testimony, two of which were written and detailed. These have been responded to separately in detail. Several additional comments are important and need response.

**Comment:** A large naval vessel should be acquired as soon as possible.

**Response:** The GMP has been revised to respond to this concern in more detail and to recognize the inherent problems of berthing access and cost of maintenance.

**Comment:** The additional sites to be marked on Guam are inadequate and others should be included, especially those concerned with atrocities against the Guamanian people. Park seems to deal only with war action itself and does not mention some of the specific incidents involving tragedy for local residents.

**Response:** We agree that other sites can be identified and marked in the future as they are suggested and researched.

**Comment:** The GMP seems to regard the park as a museum and not as an active park. This can be the cause of resentment by local residents.

**Response:** The GMP has undergone some revision and hopefully will partially correct or satisfy this concern. The intent is for an active or living park, not a cold museum. These concerns will be considered in preparation of more detailed plans and in park management.

**Comment:** There is concern that the plan does not place enough emphasis on hiring local residents for the park staff.

**Response:** Some additions have been made to the GMP text. In addition, specific actions on these concerns are part of a follow-up to the GMP and cannot be satisfied by the plan itself.
Comment: There is not enough emphasis on the need for obtaining oral history from local citizens. Only ones mentioned are Japanese historians.

Response: We agree and the GMP has been revised to reflect this.
X. FINAL REVIEW OF GENERAL MANAGEMENT PLAN AND ASSESSMENT DOCUMENTS

During February 1983, just prior to approval of the General Management Plan and final printing of the documents, an additional opportunity was provided for comment. Essentially it was designed to give those who commented on the original draft GMP an opportunity to clarify any points of special concern. It also gave the Government of Guam agencies another chance for written comments on the GMP and its assessment. Copies of the Guam agencies' letters are included at the end of Appendix B in this document.

A. Public Meeting held at Park Headquarters in Asan on February 15, 1983

This was the opportunity for those who commented on the draft plan to discuss and clarify specific points or provide additional comments. The general feeling of those who attended was that the plan should be completed and approved as soon as possible so that detailed planning and specific park programs could be begun.

Specific comments on various parts of the text of the document have been responded to by clarification of issues such as possible confusing terminology; what is a GMP, what does it include, and what other plans will supplement it; and the importance of the role of the Chamorro residents, both during the war and now as an excellent source of historical data.

One of the primary concerns expressed related to the marking of additional World War II sites on Guam. Two specific points were made: (1) more sites should be marked, and (2) more attention should be given to sites that related to Chamorro experiences in the war. The text of the GMP and assessment have been clarified on this subject and the following list of sites made available to NPS historians.

- Merizo massacre site
- Yokoi's cave
- Other possible site of concentration camps
- Sea plane ramp as site of the Tokai Maru
- Gun remains at Dungcas and Gun Beaches
- Caves near Alupat Cove
- Mass burials of Japanese soldiers in Barrigada

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B. Meeting with Mariannas Recreation and Park Society on February 16, 1983

The primary purpose of this meeting was to further clarify the comments made by the Society on the GMP and the NPS response to these comments. Most concerns were discussed to be more appropriate to day-to-day park operation or to plans subsequent to the GMP.

There is, however, an addition made to the documented response to a suggestion to add the upper slopes and summit of Mt. Alifan to the park—essentially to recognize the desirability of adding this area or at least maintain it as open space.

C. Meeting in Governor Bordallo's Office on February 17, 1983

This was primarily to provide the Guam government agencies another opportunity to comment before the final documents were printed. Most comments from the agencies represented were written, and thus responses are provided in the following comment and response sections for each letter. Several concerns expressed at the meeting, however, deserve a specific response.

Comment: What is the role of the Territorial Historic Preservation Officer during implementation of the GMP.

Response: The Territorial Historic Preservation Officer will continue to be involved in plan implementation. All actions must be in accordance with the GMP as reviewed and approved. In case of any new proposals not covered in the GMP or proposed revisions to the GMP, the Territorial Historic Preservation Officer must be consulted as part of the decision making process.

Comment: The NPS should look at less than fee acquisition of lands in the park to avoid a decrease in the tax base.

Response: We agree that this should be investigated. It will be part of the Land Protection Plan, a project following the GMP, and one which examines alternative methods of obtaining interest in park lands. Such methods could include less than fee acquisition if appropriate to the park objectives.
Comment: The GMP does not pay enough attention to the feelings of the Chamorros, to their part in the war, nor to the suffering they endured.

Response: Additions to the GMP and the assessment have been made to respond to this concern and to place more emphasis on the experiences of local residents during the war.

Comment: There are two species of endangered sea turtles found off the coast of the Asan and Agat units of the park.

Response: Information on sea turtles has been added to the GMP and assessment.

D. Response to Letters from Government of Guam Agencies

1. Letter from Acting Governor Edward D. Reyes

Comment: More attention needs to be given to the effects of the war on Pacific Islanders. For example, Manengon Concentration Camp site should be marked and interpreted.

Response: The GMP has been revised and clarified to reflect this concern.

Comment: Other sites related to the persistence and faith of the Guamanian people should also be marked.

Response: We agree and this is the intent of the plan. The GMP and assessment have been revised to emphasize this point.

2. February 7 Letter from Paul Souder, Director, Bureau of Planning

The letter finds the plan consistent with the Coastal Management Plan with the following stipulations:

Comment: Reef restoration must be coordinated with Guam Environmental Protection Agency in order to ensure mitigation of adverse impact.

Response: We agree and this will be part of any such projects.
Comment: Park management should ensure that the scene along Marine Drive in Asan will not be degraded.

Response: We agree and this is an important aspect of the intent of the GMP.

3. February 9 Letter from Paul Souder, Director, Bureau of Planning

Comment: The park as outlined in the GMP and assessments would not seem to be as mandated in P.L. 95-348.

Response: The precise intent or suggestion inherent in the comment is unclear. However, the NPS has carefully reviewed the legislation and considers that the GMP does satisfy the intent of Congress.

Comment: The was was primarily a Naval war, and the apparent inability to obtain historic naval vessels and aircraft for the park may question its ability to interpret the Pacific War.

Response: Some clarification on the issue of the naval vessels has been added to the GMP. The management objectives and the discussion of interpretive concepts both give direction to the park to emphasize the island to island pattern of the Pacific War. It would be difficult to interpret these military actions without major emphasis on the naval battles. In addition, most of the proposed interpretive facilities have a dominant physical orientation toward the sea.

Comment: The plan seems to avoid hurting the feelings of Japanese tourists and may belittle the sufferings of the Pacific Islanders.

Response: The intent of the plan is specifically to avoid hurting the feelings or belittling the sufferings of any of those involved in World War II. The interpretive plan for the park will go into this subject in greater detail. The concerns expressed will be helpful in ensuring that the park does consider the feelings of all involved in the war.
Comments Related to Coastal Zone Management Plan:
These comments were in the Bureau of Planning February 7 letter and responses have been provided.

Comment: The plan indicates a general lack of knowledge and concern about Chamorro history and culture. Specific comments follow.

Response: Two suggested changes have been made in the text of the reports.

4. Letter from Bertha L. Duenas, Director, Bureau of Budget and Management Research

Comment: While the plan's general concepts have considerable merit, the sacrifices and efforts of the local resistance movements are not adequately addressed.

Response: This concern has been expressed by others and some changes and clarification in the documents will hopefully be an adequate response. Specifically, more emphasis is placed on marking and interpreting sites outside the park that recognize the local resistance movement.

5. Letter from Paul Callaghan, Director of Commerce

Comment: There is a possible future impact of the park on commercial fishing and related water activities. There should be a clearer statement on the kinds of activities permitted.

Response: Additions have been made in the GMP and the assessment to clarify this issue.

6. Letter from Gordon W. Tydingco, General Manager, Guam Visitors Bureau

Comment: The plan is fully supported as it exists, but NPS should be sure that any boundary changes proposed in the future consider local citizens' opinions.

Response: We agree and this will be the intent of any future boundary proposals.
7. **Letter from Herman D. Sablau, Administrator, Guam Environmental Protection Agency**

All comments have previously been incorporated in the document.

8. **Letter from Antonio Charfauros, Director of Land Management**

Reviewed without comment. The plan adequately addresses management of historic sites.

9. **Letter from Peter R. Nelson, Director of Agriculture**

Comment: While in agreement with the plan's concepts the attached corrections should be made to the GMP and the assessment.

Response: Corrections and additions made to both documents.

10. **Letter from Joe E. Paulino, Director, Department of Parks and Recreation**

Comment: There are no comments or objections to the plan, however, it is recommended that the Guam Historic Preservation Office and the NPS work closer together.

Response: We agree and this is the intent of the plan and of NPS management.

Comment: It is recommended that more attention be given to sites outside the park that exemplify the role of the Chamorro people. Example: Manengon Concentration Camp and massacre sites.

Response: We agree and the documents have been revised to clarify these issues.
APPENDIX A

SUMMARIES OF PUBLIC MEETINGS
ON
WAR IN THE PACIFIC NATIONAL HISTORICAL PARK
GENERAL MANAGEMENT
SUMMARY OF COMMENTS FROM ASAN COMMISSIONER AND THE VILLAGE PLANNING COUNCIL'S WORKSHOP ON WAR IN THE PACIFIC NATIONAL HISTORICAL PARK, GUAM

Held at the Asan Village Commissioner's Office, March 22, 1979. Asan Commissioner Jose S. Quitugua arranged for the meeting, and National Park Service representatives present included:

T. Stell Newman - Superintendent, War in the Pacific NHP
Ron Mortimore - Park Planner, National Park Service, San Francisco Office
Tom Fake - Landscape Architect, National Park Service, Honolulu Office

There were about 15 persons at the meeting.

SUMMARY OF MEETING:

Superintendent Newman introduced himself and other National Park Service representatives. He briefly described the National Park Service, the new national park on Guam, and what lands the park includes.

Park Planner Ron Mortimore then discussed some of the park's background, the requirements of the authorizing legislation, the specific requirement for preparation of a general management plan for the park within the next two years, and the need for public involvement in the preparation of that plan.

The remainder of the workshop was an informal discussion among planning council members, National Park Service representatives, and local citizens. The following discussion serves as a report back to the community of Asan on "what we think you told us at the meeting."

One of the major subjects discussed at the meeting concerned lands which might be acquired by the National Park Service and possible park boundary changes:

-- The NPS should take a look at lands above Asan Village to determine whether or not the park could exclude some parcels of private land that are outside the GHURA urban renewal project.
Local landowners are concerned about possible exchange of lands and need to know answers to specific questions such as when and how is it done, what are the limitations on exchange, and can only other Federal land be exchanged.

The relationship between the NPS and GHURA is not clear-specially, regarding funding for purchase of lands along the coastal side of Marine Drive and relocation of residents and businesses.

There is a problem for the local landowner if he wishes to obtain a second appraisal. It was suggested that the appraisals be done by an off-island firm. Then the landowner could more easily use a local appraiser for the second appraisal.

It was asked what the NPS does if a landowner within the authorized park boundary does not wish to sell. It was explained that the NPS does have the power of condemnation within the park.

It was further asked, if there is a land exchange, does the landowner get the exact amount of land he had or does he get more. The response was that the exchange would be based more on value than size.

What if an owner has ten mango trees on his land? Will he get ten mango trees the same age on exchange land?

It took eleven years for this park to get this far. Assuming that there is further delay before lands are purchased, can the property owner build a structure even though land is within park boundary? And, does residential use of land necessarily mean it is not suitable as part of the historic scene? The concern here appears to be two-fold—land acquisition delays concern the owners, since they feel they may not be able to improve property that is to be bought by the park. It was asked why it is necessary for the NPS to preserve the "historic scene" by purchasing land which would be used for residences. It appears that individuals in the community have some questions about whether or not this type of acquisition is justified.

There was a question about the site for a proposed new Asan school, and the group that asked the question was informed that this site is outside the national park boundary.

The other major area of concern expressed at the meeting was how the lands at the Asan annex, that is, land on the ocean side of Marine Drive, would be used or developed:
-- The community feels the need for sports facilities and would like the NPS to consider providing those facilities.

-- A baseball field is one of the most discussed community needs. Further, the field could be used by young and old alike and should be lighted for night games. The nearest baseball field is at Adelup Point, and it is used by other communities also.

-- There has been some confusion about who is now using the lands at Asan annex. It was explained that the NPS now owns and manages the land. The existing facilities and uses will remain for awhile, but will eventually be discontinued.

-- The Asan community would like permission to use the Asan annex lands and is somewhat upset because the entire area is currently locked after 4:00 p.m. and surrounded by a high fence. It is felt that it should be clear to the Asan residents what the NPS is going to do about opening the land to public use (specifically to Asan residents) and when it will actually be open.

-- There was a specific request that the NPS consider fencing an entire baseball field, if possible, a major league field, like the one at Adelup school. The Department of Parks and Recreation could provide details on exact size and type of field. The community also would like to assist in administering and programming the use of recreation facilities.

The community also discussed traditional uses of the Asan annex and would like these to be given consideration in the park's plan:

-- Traditional uses by local residents include salt gathering, residential use, and some agriculture. The land character has changed considerably, however, and may no longer be suitable for agriculture.

-- Some sites are also associated with Chamorro legends, and there is local concern about preservation of Chamorro culture. These sites should be given consideration in planning.

-- It was suggested that there be a memorial at Asan dedicated to the military men and civilians who died there.

-- In addition, there was a special Mass said at Asan on an annual basis. It might be desirable to permit and provide for this type of traditional use.
This is a summary of the points we think were made at the Asan workshop. If there are additions, questions, or if you feel we left out important points or have not been accurate, please contact Superintendent Stell Newman at War in the Pacific NHP, P.O. Box FA, Agana, Guam 96910. Telephone: (011+671) 477-8525
SUMMARY OF COMMENTS FROM PITI COMMISSIONER'S PUBLIC WORKSHOP ON WAR IN THE PACIFIC NATIONAL HISTORICAL PARK, GUAM

Held at the Village of Piti, March 23, 1979. Piti Commissioner David B. Salas arranged for the meeting, and the National Park Service representatives present included:

- T. Stell Newman - Superintendent, War in the Pacific NHP
- Ron Mortimore - Park Planner, National Park Service, San Francisco Office
- Tom Fake - Landscape Architect, National Park Service, Honolulu Office

There were about 5 persons at the meeting.

SUMMARY OF MEETING:

Superintendent Newman introduced himself and other National Park Service representatives. He briefly described the new national park and what lands it included.

Park Planner Ron Mortimore then discussed some of the park's background, the requirements of the authorizing legislation, the specific requirement for preparation of a general management plan for the park within the next two years, and the need for local public involvement in the preparation of that plan.

The remainder of the workshop was an informal exchange between local citizens and the representatives of the National Park Service. The following discussion serves as a report back to the community of Piti on "what we think you told us at the meeting."

Concerning the possibility of park visitors, buses, and cars entering and passing through the village, several points were brought up:

-- The park is seen as an opportunity to sell local crafts to tourists.

-- There was no objection to routing traffic into or through the village.

-- Likewise, there was no objection to building a road adjacent to the village to give visitors access to the Piti guns. It was also expressed that craft sales could be handled within the village at the guns themselves, or in the immediate vicinity of the village and the guns.
There were also suggestions on how the NPS should conduct future meetings, provide information, and thereby receive the help of local citizens.

-- People on Guam don't know much about national parks. A movie on mainland parks or a movie or slides on parks and facilities in Hawaii would provide a basis for ideas and suggestions by local people.

-- Send out flyers with information and ideas on the park. Then the community could comment on these.

-- Have a local citizen, the commissioner perhaps, be available to translate into Chamorro when necessary.

General comments on the park included the following points:

-- Piti citizens would very likely use the Asan Unit, depending on what facilities there were. Suggestions included picnicking and camping. The NPS should consider a concession within the park for selling crafts and such.

-- Build a trail through the mahogany grove near the Piti Guns.

There were several who suggested this. It was also considered important to preserve the mahogany grove.

-- Every park should have a restroom.

-- The NPS should look at other lands such as lands with reservoirs and particularly other Federal lands to consider adding them to the park to provide for local recreation use.

-- Local citizens are concerned that the Federal Government, particularly the military, may take over land on the island and not use it for anything.

-- Piti citizens are also concerned about the park boundary. The park now includes units at Asan and Piti, but what about the future? Will the NPS want more? There still may be some confusion about boundaries. Some people think that the park includes a lot of land between Asan and Piti. For clarification it was explained at the meeting that there was a previous proposal which did include much of the inland area between Asan and Piti. The park, as authorized, however, includes only a small parcel of Government of Guam land around the Piti guns and a completely separate larger unit in the Asan area.
-- In discussing boundaries, there should be someone from the village to explain to local citizens where the lines are in terms of traditional landforms and ownership lines.

-- The possibility for exchange with other Federal properties outside the park rather than straight purchase of private property should be emphasized.

-- The best advice to the NPS is to present a clear picture of the park to local people and to be open and honest to the community.

This a description of the points we think were made at the Piti workshop. If you have any additions, questions, or if you feel we have left out important points or have not been accurate, please contact Superintendent Stell Newman. The address is: War in the Pacific National Historical Park, P.O. Box FA, Agana, Guam 96910. Telephone: (011-671) 477-8525.
SUMMARY OF COMMENTS FROM AGAT COMMISSIONER'S WORKSHOP
ON WAR IN THE PACIFIC NATIONAL HISTORICAL PARK, GUAM

Held at the Agat Elementary School, March 26, 1979. Agat Commissioner Antonio R. Terlaje arranged for the meeting and National Park Service representatives present included:

- T. Stell Newman - Superintendent, War in the Pacific NHP
- Ron Mortimore - Park Planner, National Park Service,
  San Francisco Office
- Tom Fake - Landscape Architect,
  National Park Service,
  Honolulu Office

There were about thirty persons at the meeting.

SUMMARY OF MEETING:

Superintendent Newman introduced himself and other National Park Service representatives. He then briefly described the National Park Service, the new national park on Guam, and what lands the park includes. The group was then shown a movie entitled, "Our National Heritage," showing the types of areas administered by the National Park Service. Following this, Park Planner Ron Mortimore discussed some of the historical park's background, the requirements of the authorizing legislation, the specific requirement for preparation of a general management plan to be prepared within the next two years, and the need for public involvement in the preparation of that plan.

The remainder of the workshop was an informal discussion between the local community and National Park Service representatives. The following serves as a report back to the community of Agat on "what we think you told us at the meeting."

The beginning of the discussion dealt with several general community concerns:

-- There is some confusion and, therefore, some concern regarding the exact park boundary, particularly on the lower part of the Mount Alifan Unit. It is not clear, for instance, whether or not Lot 211 is included in the boundary. The National Park Service officials stated that, as far as they know, there are no parcels of private land in the Mount Alifan Unit. It will, however, be necessary to confirm that by a detailed boundary survey.
The stretch of beach between Gaan Point and Rizal Point and the adjacent offshore area are part of the historical park, but there is no public access to the beach along this stretch of shoreline. The local concern is that there may be increased demand for shoreline and beach access when the historical park is developed. It is suggested that the National Park Service consider acquiring lands for public access to the beach to handle the potential increased pressure for use.

It was asked why there is a sewage disposal plant in the national historical park and if it is really necessary that it be there. It appears to the local community that the NPS got the plant by accident.

The NPS needs to clarify what use will be permitted in water areas adjacent to Agat. Are these areas available for public use, and what restrictions, if any, will there be?

Local citizens mentioned that there are World War II remains offshore in Agat Bay. NPS officials commented that these remains are important and will be examined as part of the basic historic research project to be accomplished soon.

There are people in Agat who worked on some of the bunkers for the Japanese. They should be contacted by the historians since they have valuable information.

The community is interested in what kinds of facilities or war relics would be provided at Gaan Point and Bangi Island. Suggestions include reconstruction of an observation tower and some of the Japanese guns at Bangi Island.

The community is concerned about the future of the Agat cemetery. It is felt that this cemetery is unique on the island and should be protected.

There is also some concern that Asan is getting all the attention in the park plan. Agat is just as important, and it has been getting the short end of things in the past. Agat should also be able to share in the tourist dollars. NPS should go ahead and interpret the war, but place more emphasis on Agat. One suggestion is to provide a movie of the invasion.

There was some question about whether or not the NPS would have power to control land outside the boundary. It was explained that there would be no such control except within the park boundary.
The major interest expressed at the meeting is related to the boat harbor proposed by the Corps of Engineers at Gaan Point and the relationship of that proposal to the national historical park. The following is a summary of the ideas and opinions expressed:

-- It would be preferable if both the park and the boat harbor were developed, but if it comes to one or the other (but not both), then build the boat harbor.

-- Agat citizens are not opposed to the park and feel that the boat harbor would not detract from the park. Both should be provided.

-- The people in Agat need to know how the decision on the boat harbor will be made, who will make the decision, and how Guam citizens can have some effect on that decision.

-- There is some concern that the NPS may be an obstacle in getting facilities for boats in Agat.

-- Originally in the 1950's Agat wanted only a launching ramp, but now a boat basin also is proposed. The people want the boat basin built, but the launching ramp is still needed as well.

-- Local citizens are getting impatient, because for years they have been fighting for boating facilities and they are needed. If a launching ramp were all that was needed, Agat would have had that long ago. Also, they need more than just a launching ramp. The NPS could assist in solving this problem.

-- The NPS should listen to what people in Agat say, not what they say off-island.

-- With a boat harbor, Agat could get a share of the tourist dollar, provide a good recreation facility for the community, and provide a facility for tourists.

-- The boat harbor could provide a way for tourists to see the park. The NPS could have boat trips along the Agat shoreline. Also, why not provide an LCM or similar boat along the shoreline to use for a hot dog stand or something similar as part of the park development. The community is also concerned about the Government of Guam's role in providing a boat harbor. The Corps of Engineers has provided a basic plan for marine facilities so we should build these facilities while we can. Guam should provide shoreline facilities such as parking, restrooms, etc.
The primary message to the Federal Government is—the Corps of Engineers should get their act together, decide what they recommend, and let the citizens of Guam know what is going on.

The basic problem at Agat and the boat harbor is economical. Local residents drive some distance to work now, and the local community needs a basis for providing local jobs. Gaan Point development could be a major stopping point for many visitors and would provide some jobs for local residents.

Any planning decision should include the economic aspects of the park and its development—boat harbor, tourism, fishing, or other.

The boat harbor idea has been in the planning stages for 15 years. Now we are at the point of making a decision, but it is felt that there is still time to make changes in the plan before anything is built.

The community feels that if Agat Beach is to be restored to its World War II appearance, much more work would be needed than is now proposed. Why not face reality and accept one more development in the park like the boat harbor?

There was also some discussion concerning the use of lands at Gaan Point for local recreation:

The community feels there is a need for a baseball field and some associated facilities. Suggestion: Why not remove some of the lands from the park so that they can be developed locally, or have the park develop a full-sized major league ballfield with dugouts and fence? There is particular concern about this because the Agat community feels that there are few, if any, flat areas in the vicinity large enough for such a development. Also, Gaan Point is convenient to the center of the village.

If Agat were to develop a ballfield, it would probably be necessary to obtain title to the land. Also, the community needs assistance from the Territory or the Federal Government to build the facility.

Two significant views regarding National Park Service planning were brought out near the end of the meeting: —Agat citizens are worried that the NPS may have already decided its position, and it was requested that the opinions of the community be made known to decisionmakers.
The greatest fear of the community is that in the final analysis they will have no say about the decisions being made.

This is a description of the points we think were made at the Agat workshop. If you have any additions or questions, or if you feel we have left out important points or have not been accurate, please contact Superintendent Stell Newman. The address is: War in the Pacific National Historical Park, P.O. Box FA, Agana, Guam 96910. Telephone: 477-8525.
SUMMARY OF PUBLIC INFORMATION MEETINGS DURING PREPARATION OF DRAFT GENERAL MANAGEMENT PLAN, GUAM

Six meetings were held on the draft General Management for the War in the Pacific National Historical Park. The first was in Piti on June 4 with the Piti Municipal Planning Council; Agana on June 6; Agat on June 9; Asan on June 10; Piti on June 13; and Agat on July 1.

Each of the meetings generally started off by the Superintendent showing the existing park boundaries set by Congress and then showing the proposed minor boundary changes in each of the areas.

Agat Unit: Change the boundary to take the sewage disposal plant out of the park; take out the parkland between the sewage disposal plant and the cemetery and add church land on the other side of the cemetery to make a continuous stretch of parkland between the cemetery and Bangi Point.

Asan Beach Unit: Add the area on the right side of Adelup Point to the park because some significant historic structures have been discovered in that area and add some land for an access road to Adelup Point.

Inland Asan Unit: Add the area where the last command post of the Japanese was located. Also add an area on Nimitz Hill to be used for an overlook.

Mt. Alifan: Some areas within this unit do not contain any significant historical features and it is proposed to exclude these from the park so they can be used for other purposes. There is a problem on how to get people into this unit of the park. The easiest way seems to be by sharing the road with the Agat Junior High School, and then adding some additional land off it for an access road into the park.

Mt. Chachao/Mt. Tenjo: Propose adding a small strip of land which contains some archeological sites, and correcting the original boundary by including the summit of Mt. Tenjo and parts of the existing four-wheel drive road.
Piti: The original idea was to build a road leading from the road to Nimitz Hill above the school and coming over to the guns. This route has been examined and it appears that it will be expensive to construct. Although changed after the Piti meeting, the National Park Service recommended a public access road coming up on the right side of the Piti church near the powerlines and then having a loop that goes up to the small flat area near the Piti guns, then continuing down the other side to connect with the entrance road near the church.

The Superintendent then introduced Ron Mortimore, Park Planner from the Western Regional Office in San Francisco, who explained the proposed development plans for each unit. They include:

Agat Unit: A major interpretive facility will be at Gaan Point. Interpretive signs and/or exhibits will also be located at Rizal Point, Apaca Point, Bangi Point, and Bangi Island. Some recreational picnic facilities have already been installed at Apaca Point. The area between Gaan Point and Bangi Point will be developed for beach recreation use.

Asan Beach Unit: The major interpretive facility will be at Asan Point, along with World War II military equipment. Beach recreational facilities were proposed along the strip of land from Asan Point to Adelup Point. The large open space previously occupied by the Naval Hospital annex will be suitable for large gatherings such as fiestas or special celebrations. The area which has traditionally been used by Asan Village for memorial services on Liberation Day would be preserved for that purpose.

Inland Asan Unit: Most of this area will be left open with trails through the area and a major overlook will be provided at the summit of Nimitz Hill.

Mt. Alifan Unit: Trails will be provided through the area to historic sites from a parking facility near Agat Junior High School.

Mt. Chachao/Mt. Tenjo: A trail would be built through the area with two overlooks.

Piti: Develop and interpret the Piti guns by interpretive signs and construct a nature trail through the mahogany grove.
PUBLIC COMMENTS AND QUESTIONS:

Piti Meeting, June 4, 1980:

The primary interest expressed at this meeting related to the Piti Unit and proposed access to the guns. The following is a summary of the concerns of the Council and the responses by NPS representatives.

1. There is an existing government road that goes up to the top of the hill to the water tank--left side of the church--why not use that for the access? Response: There is no known parking space on the hill in that vicinity.

2. The comment was made that people could park near the water tank. Response: This area is steep and could be difficult to reach.

3. A suggestion was made that NPS come down from above by using the road to the new cemetery near Nimitz Hill Estates. This should involve coordination with the Veterans Administration since there is a proposal for a national cemetery in that area.

4. A question was asked whether a road under the powerline would be permitted. Response: It would be, but there would be some restrictions on development.

5. One member expressed his dislike for the plan for the new road being proposed by NPS through the village of Piti. Response: NPS representative told the members that NPS had a meeting about a year ago in Piti; the question was asked about coming through the village, and the message NPS got then was that it was alright. But he also explained that what NPS is trying to do is find the least expensive way to get access to the guns, and a route that would have the least impact on the village.

6. The general consensus of those present was that the road should not go through the village because:
   a. The unsafe intersection on Marine Drive would be made more unsafe;
   b. It would be dangerous for school children;
   c. The buses would affect residences with noise and fumes; and
   d. The road would create more traffic.
7. Several suggestions were made then on alternative road routes and parking areas and there was discussion on relative cost of construction, possible relocation of power-lines, and the importance of avoiding going through the village.

8. At this point Ron Mortimore told the members that another planner, Art Dreyer, would be coming out to Guam and that Dreyer would look more closely at other alternatives.

9. The question was asked about what advantages to the village would result if the road were built as proposed in the draft plan. The response was that the only real advantage is that it would keep bus traffic from some village streets.

10. One of the members suggested that the Planning Council study the draft master plan more carefully and get its recommendations to NPS.

11. Concern was expressed that, since the NPS will be going to the different villages with the proposed plans, each village might have some ideas and changes that would delay the process and it would take a long time for development. Response: Don't think it would. NPS can work out problems like this one without too much difficulty.

12. One person asked if you have to drive right to the gun site or could you drive near it and walk to it. Response: The problem is that flat parking areas are available below the guns and a long way away, but nowhere in between.

13. The question was asked about which is more expensive, to build a road to the guns or move the guns down to a lower level, like near the school or by the USO park? Response: It's a reasonable idea--we could do it. But the guns are where they used to be and probably should remain there.

General feelings of the group seemed to be that because of historic significance, the guns shouldn't be moved.

14. One suggestion was to build the parking lot and have a trolley or cable car take people up and back down to parking lot. Response: This is an excellent idea in many cases, but it would be expensive and would require a lot of visitors to make it financially feasible.

15. At this point the Superintendent asked the members of the Council if they saw any problem with adding the remainder of the hillside (oceanside) in front of the guns to the park. Some members mentioned that some of that property belonged to the church. One asked what it is used for, and
one mentioned that he used the hillside for farming and raising pigs.

16. It was then suggested that a day be set for a few of the Council members to go with NPS officials to walk the area and look into alternative sites for the road. Monday, 9:00 a.m., was set and every one would meet at the Commissioner's office. (The trip was held as scheduled and the result was a consensus that the NPS should develop several alternative access and parking proposals.)

17. Other comments:

   a. Part of the meeting was taken up with concern about landowners within the boundaries of the park. Everyone seemed satisfied after hearing the Superintendent explain the land acquisition process.

   b. One member asked whether any other area besides the gun site was to be utilized by the park in Piti. Response: There was not.

   c. One member asked whether NPS would have any restrictions on fishing along the reef within the park boundaries. Response: There are no problems with any traditional reef use.

   d. One member asked if there was going to be a park ranger assigned to the park area. Response: There will probably not be a ranger assigned just to Piti but there will be rangers going through the park areas, meeting with tour buses and taking visitors on guided tours around the park area.

   e. Concern was expressed as to who would maintain the road and restroom facilities. Response: NPS would do the maintenance.

At the end of the meeting there seemed to be satisfaction with the proposed plans and several members expressed that they were glad that NPS was taking village feelings into consideration.

Agana Meeting - June 6, 1980

This meeting was very informal because there were few people in attendance.

1. A landowner from Asan asked whether NPS planned to retain any of the buildings presently on the oceanside of Marine Drive in Asan. Response: No buildings would be retained except the Haloda building as a temporary visitor center for a few years.
2. A question was asked whether NPS would build a large structure at Asan Point similar to the one at Ipao Beach which could be used for concerts. Response: No plans to build a large structure of that kind.

Agat Meeting - June 9, 1980

About five major subjects dominated the question-and-answer portion of this meeting. They include:

1. Access into the Mt. Alifan Unit:

It was explained to the group that the best access into this unit would be by constructing a short access road off the road to Agat Junior High School. Some people felt that it might not be a good idea since people could not get into the park when the school closed and the gates were locked. The Superintendent explained that this might be worked out with the school or the Department of Education. Another suggestion was to build a new road close to the existing school road just for access into the park. These and other alternatives will be looked into further.

2. Availability of Funds for Land Acquisition Program:

People expressed concern that there was only $500,000 available for land acquisition this year and no money in the budget for next year. Their main concern was what would happen to the landowners. They were assured that there was probably enough money available in this year's appropriation to purchase the Bangi Island property and that although there was no money in next year's budget, eventually money would be available for purchase of all remaining private properties.

One person wanted to know if a survey had been made to find out how much land had to be purchased and how much it was going to cost. The response to this was that when a park is first proposed a gross estimate is done because Congress needs to know the approximate land cost. If after the program is well underway NPS finds that the gross estimate is not enough to purchase all the land it needs for the park, then NPS can ask for additional funds for the acquisition program. In the case of the War in the Pacific National Historical Park on Guam, the land costs were estimated at about $16 million.

3. Bangi Point Acquisition:

The Superintendent met with Mrs. Grace, the owner of the property, and her brother in December 1979. At that time he was told that if Mrs. Grace was going to have to sell her
property to the park sometime, she would prefer to do it immediately. Because of her personal situation, NPS determined it was a hardship case and her property was scheduled to be the first one purchased.

However, there may be a misunderstanding in this situation because according to a relative and neighbor at the meeting, Mrs. Grace does not want to sell immediately. She told them that she was approached by an Interior official and told that she had to move off her land soon. Because of these comments the Superintendent will talk with Mrs. Grace to find out if she still wants to sell now and to be sure she is aware of all the options that are open to her under the land acquisition program. (This was done and she preferred to sell as soon as possible.)

4. Apaca Point:

A suggestion was made about possibly tying in the adjacent triangular-shaped land parcel with the Apaca Point Picnic Area. This belongs to the Navy and the Government of Guam would like to acquire the parcel for a baseball field. This will be kept in mind as a design possibility when preparing the detailed design for Apaca Point and Rizal Point.

5. Access to Beach Area:

The people were asked how they felt about additional access to the beach area between Namo River and the Community Center. The consensus at the meeting was that additional access is desired, but that NPS should first look at using public land and not private land for this purpose. If public land is not available then look at private land, but not anywhere people are residing. It was also determined that this was not something that necessarily needs to be done right away but can be kept in mind as a possibility later on.

6. Other Questions and Comments:

a. How did the park get started -- did the request come from this end? Response: It started in the 1950's with Guam asking the Department of the Interior to come out and see if there were any historically significant lands that should be incorporated into a park. It was determined then that there were such significant historical lands but nothing further happened. In the 1960's the request was again made, this time a War in the Pacific National Park proposal was introduced in Congress. But nothing further came of this proposal either. Then in the 1970's further studies were conducted and in 1978 the War in the Pacific National Historical Park was established by Congress.
b. How long for the completion of the whole project? Response: It would probably take about three years to get started on development and the development would probably take about five to eight years to complete.

c. How much do you anticipate it will cost to purchase Bangi Island which belongs to a relative of Congressman Won Pat? Response: NPS proposes to do all purchases or exchanges on a friendly basis and pay a fair market price. In the case of Bangi Island, however, the land must be condemned and the acquisition handled by the U.S. Department of Justice since the land belongs to a relative of a Congressman. This will assure that everything is done above-board.

d. One person said he owns land near Finile Creek and it was explained that if that portion was added to the park then the property will be purchased.

e. How soon will NPS begin to start purchasing property -- next year, or two years from now? Response: NPS is in the process now of purchasing the Bangi Point property. NPS has a contract with GHURA for GHURA to handle the acquisition of lands -- title searches, appraisals, etc. Right now there is a contract for the title searches, but the contract for the appraiser is still being worked on. As soon as that contract is completed then the acquisition process will begin.

f. Who owns the land involved in the boundary changes near the cemetery? Response: There is a discrepancy in the land records. The church maintains it owns the parcel of land between the sewage disposal plant and the cemetery, but NPS records show it to be Government of Guam land. If it is church land then it would not be purchased if it is removed from within the park boundaries.

g. What happens to the sewage disposal plant? Response: It would continue to operate as long as needed. It might be excluded from the park by a boundary change.

h. Will all the houses at Bangi Point be dismantled? Response: One house will probably be retained to be used as a satellite office for a while; the others will be removed after purchase.

i. What will the NPS do with the sewer outfall peninsula? Response: The outfall was not present during the war and if at all possible it will be removed. NPS will have to be careful not to disturb the sewer line itself. An engineer would be needed to check if it could be removed. But the priorities right now are purchasing of land and park
development and this is something that is probably years down the road.

It was the consensus of the group that another public meeting be scheduled so that the officials (who were not present because of another meeting set for the same time and date) and more people from the village could attend and hear the plans. Meeting has been set for July 1, 1980.

Asan Meeting, June 10, 1980

1. There are additional sites of historic significance relating to World War II in other parts of Guam -- are there any plans to include these areas within the War in the Pacific National Historical Park? Response: The law establishing the park made a provision for the identification of other historic sites by putting up interpretive signs or other markers. Some of the sites identified at the meeting include:

   a. In the Mt. Chacho area right behind the fire station on Nimitz Hill there once was a Navy hospital annex which was used by the Japanese during the battle for Guam for soldiers who needed amputations.

   b. In the area behind the University of Guam there is a high cliff where a lot of Japanese soldiers took their own lives.

   c. At the location where the dental clinic is, on Naval Station, about 2,000 Japanese soldiers committed suicide and were buried there.

   d. The Japanese invaded Guam by coming in on the beach at East Agana.

   e. There are also some areas up in the northern part of Guam.

2. Would it be possible for a landowner who has a house on his property to be compensated by getting an exchange of land equal to the value of his land and then to get cash for the value of the house rather than to get land for the value of the house and raw land he owns? Response: Not sure if it is possible, but will check on it.

3. Does NPS plan to put a big structure in the Asan Point area? Response: There will be some kind of structure at Asan Point, but it will not be a big one.

4. Are there any plans to develop the open space at Asan Point where the Navy Hospital Annex once stood? Response:
That area will be open space with no development so it can be used by the people of Guam for big ceremonies such as fiestas, liberation day festivities, etc.

5. The NPS representatives asked the group what kind of development they felt would be good along the shoreline between Camp Asan and Adelup Point. The consensus seemed to be that the area was too small and too near the main highway traffic to have any kind of recreational facilities other than picnic tables and BBQ's.

6. What kind of security will provided for the park units? Response: There will be rangers going through the park areas and there would be some kind of cooperative agreement with the Department of Public Safety to enforce the law within the park areas.

7. Does NPS plan to hire local residents to work for the park? Response: Since NPS is a federal agency, the hiring will have to be done by Civil Service laws. People from Asan would be considered along with people from other villages.

8. What happens if there is already a park on the land where a national park is going to be established -- would NPS's responsibility end at the line where the Government of Guam park lies? Response: If the existing park is within the NPS park boundaries, eventually it would be turned over to the NPS which will assume the responsibility and maintenance of that park area.

9. What happens if funds stop coming in for maintenance equipment -- will maintenance activities just stop? Response: Something would have to be worked out, possibly with the help of the Government of Guam.

10. When the development of the park begins, will local people be used for construction? Response: The local NPS office staff will probably do the small-scale construction of things like picnic shelters, tables, etc.; also the Young Adult Conservation Corps will assist NPS in the small-scale construction and maintenance of the park, as they have already been doing, and these are all local young adults. The big construction will be done by the lowest bidder and most likely the company selected will be one from Guam.

11. After the plan is finalized, when do you expect to start the development program? Response: After the final plan has been done, it will have to be approved by the Regional Director and then will have to be approved by Congress. Once Congress approves the plan then we can begin programming and budgeting.
Piti Meeting, June 13, 1980

This meeting was attended by the residents of Piti. Comments and questions were generally the same as the previous meeting held in Piti on June 4.

Agat Meeting, July 1, 1980

Meeting was held; however, no one attended.
APPENDIX B

COPIES OF LETTERS OF COMMENT
Mr. Douglas L. Griffin,
Assistant Regional Director
Cultural Resources
National Park Service
Western Region
450 Golden Gate Avenue
San Francisco, CA 94102

Dear Mr. Griffin:

I am responding to your letter of May 7, 1982 (Ref. H4217 WR-RCH) regarding historic preservation as related to the General Management Plan and Draft Environmental Assessment for the War in the Pacific National Historical Park.

I am concerned about several items in the Plan relative to historic preservation. During a preliminary review of the Plan by our department, I have noted first, that not all cultural resources have been identified, for example, the submerged features. Second, the Plan gives no evaluation or discussion toward historic preservation treatment, such as restoration or preservation of historic features within the park. Third, I feel that the proposed major interpretive facility at Asan Point, the Matgue Valley administration and maintenance facility and Mount Alifan Trailhead among others, appear to have an adverse effect upon the park. Fourth, the plan and environmental statement does not discuss the alternative of restoring the historic scene, which should be the goal of a national historical park.

Therefore, at this time I am not in concurrence with the recommendations of the Plan since they fail to adequately address historic preservation concerns. Our Department will be submitting comments regarding the General Management Plan and Draft Environmental Assessment for the War in the Pacific National Historical Park to T. Stell Newman, Superintendent of the Park by the end of this month.

Sincerely yours,

JOSEPH F. SORIANO
Historic Preservation Officer
Mr. T. Stell Newman  
Park Superintendent  
War In The Pacific National Historical Park  
Post Office Box FA  
Agana, Guam 96910  

Dear Mr. Newman:

The Guam Historic Preservation Office of the Department of Parks and Recreation is pleased to submit its comments on the Draft General Management Plan and Environmental Assessment Study of the Guam National Park. We take this opportunity to comment on these plans in order to provide and assist your office with the interpretation and administration of the Park. As in the past, it is of utmost importance that your office and the Guam Historic Preservation Office work together to plan the National Park in the Western Pacific. We have had considerable communication on the Park Plans since its inception, and it is more vital that we cooperate and communicate further for the mutual benefit of all. With this working relationship, we can develop a Park that is of National significance and integrated to the history of the Pacific People who were a part of the Pacific WWII Campaign.

Although the Park is in its infancy, established in 1978, the draft plans must be carefully reviewed comprehensively in all areas pertaining to the administration, interpretation, presentation, environmental, and personnel concerns. These concerns must be addressed to insure the future objective of the Park.

After considerable review of the draft plans, the Guam Historic Preservation Office staff provide the following recommendations:

ADMINISTRATION

There has been concern recently in the Preservation Office that the State Historic Preservation Officer (SHPO) should take an active role in the preparation of the Park Plans. Communication is a must to prevent any future misunderstandings of the general plans of the Park. Although the Park is on the National Register, it is also on the Guam Register of Historic Places. The SHPO is the responsible government official pertaining to any historical site in any state or territory. It is also recommended that visiting officials from the National Park Service (NPS) be introduced officially to the SHPO. This concern is relevant in coordinating local cooperation. The SHPO have been receiving letters from the NPS for information and assistance. It would reflect on our part if there
is no communication between the Guam offices. This would prevent any duplication of effort or correspondences from both offices.

Perhaps the greatest concern of the general public of the Park is the initiative of the local NPS Office to train and provide management positions. The law authorizing the creation of the Park stipulates that residents be considered for these positions. No cooperation from the general public can be generated if this law is not implemented. On the dedication of the Visitor's Information Center, Guam's delegate to U.S. Congress, commented on the poor attendance of the Guam residents at the ceremony. This indication is also related to the lack of public information on the Park.

The administrative policies also reflect that participants on the local level have never been encouraged. The U.S. Navy, during the summer of 1982, offered their volunteer services to beautify the Asan Park Unit. Perhaps many of the various communities can also take an active role if there is a request to seek their assistance.

INTERPRETATION

The interpretation of the Park must be responsive to the experiences and history of the Pacific People, Americans, and Japanese. No matter how extensive the research of the War is conducted, it lacks authenticity if oral history is not relied upon. It is commendable on the NPS that an oral history research was conducted through the assistance of the Micronesian Area Research Center (MARC) of the University of Guam. It is difficult to interpret the war, since each side has its own interpretation. It is advisable through the interpretation of the Park to consider all sides in the preparation of Park brochures, audio visual programs, and display exhibits. On the Draft General Management Plan, there are errors in the sites stated and numbers enumerated. Dates are also indicated incorrectly. These should be reviewed and comments have been provided by the Marianas Recreation and Park Society (MRPS). Comments have also been submitted by the Bureau of Planning. The primary concern here though is not with dates or numbers, but the emotions and experiences of the people. The Park can provide all the statistics of the war, but it would be futile if reflection of the Park is merely to indicate sites and historical dates. At the dedication of the Visitor's Information Center, all the guests speaker emphasized that the intent of the Park is to instill among each visitor the horrors and consequences of war.

As Lieutenant Governor Joseph F. Ada so aptly stated, "There are no winners in any war, only losers." The interpretation of the Park should also be realistic. An example of the Japanese and Marine mannequins should be sold. The display depicts the mannequins as models, typical of any department store display. The other displays should also be reviewed. There are many pictorial collections of the war that perhaps could more adequately interpret the war. Emphasis must be focused on the Guam Collection Pictorial Reviews. The Park area should incorporate within its plans a realistic war scene. The artifact should not be displayed in some area uniformly.
PRESENTATION

It is commendable on the NPS to present the interpretation of the Park in several languages. The future development of the Park is dependent upon its human resources. For this reason, the training of personnel should be a priority. The interpreters must be educated and knowledgeable. The assistance of the Guam Historic Preservation Office, the Guam Territorial Library Guam Collection, The Guam Museum, and the MARC must be sought.

The proposed hiking trails should reflect the actual invasion plans from the landing sites to inland movements. Interpretive markers must be accurate. In reference to accuracy of markers, the labels on some of the displays at the Center must be corrected. Another commendable project of the NPS is to develop underwater trail for scuba divers. This should be pursuit and measures should be taken to protect these underwater cultural resources. The NPS could coordinate their plans with several Government of Guam agencies such as the Marine Laboratory at the University of Guam.

ENVIRONMENTAL

Measures should be taken to protect the environment of the Park. As in the case of Asan, the Park nearly surrounds the village proper and would insure no other development other than the Park objectives. Since half of the sites are located along the coast, the water environment should be protected. Other proposed government projects should take into consideration the status of the NPS Park. Exceptions should be granted so that no projects that might affect the integrity of the Park is hindered.

PERSONNEL

This has always been a sensitive issue, and the NPS personnel are no exception to this sentiment. The recruitment of personnel from outside of Guam is understandable if there are no local persons qualified to fulfill the job specification as required. This attitude here typifies the impression that no one locally is capable of occupying that position. It is simply a matter of ethics more than ethnic consideration. This should not imply that prejudism is involved. As in any case, the recruitment of personnel should first be sought locally than elsewhere. The Park administration should initiate a tentative program for the training of personnel. This was discussed earlier and the emphasis here is to plan a program.

These recommendations are meant to assist the NPS Staff with the development of the Park. We have been fortunate to have worked with your office in the past, and we hope that mutual relationship of working together is continued into the future. With these comments, I send my full cooperation and that of the Guam Historic Preservation staff.

Sincerely yours,

JOSEPH F. SORIANO
State Historic Preservation Officer
Memorandum

To: The Governor

From: Chairman, Guam State Clearinghouse

Subject: War In the Pacific: General Management Plan and its Environmental Assessment

The Clearinghouse Review Committee has completed its review of the National Park Services' (NPS), U.S. Department of Interior, project plan on the above subject and recommends conditional approval.

Resulting from U.S. Public Law 95-348, NPS was mandated to prepare a general management plan for the approved national park on Guam, called the War in the Pacific National Historical Park.

The portion of the plan which I feel merits serious reconsideration on the part of NPS deals with the proposal to exchange federal surplus properties for the park land. I strongly feel that the Government of Guam's position on this matter should be that lands for the park be purchased outright with funds provided through U.S. Congressional appropriation.

Therefore, U.S. Department of Interior should launch a strong lobbying effort in the U.S. Congress for an appropriation so that funds to buy lands for the park will be available.

The Guam State Clearinghouse wholeheartedly supports the concept of a National Historical Park on Guam, however recommends conditional approval of the general management plan, pending reconsideration of the park land matter.

JOSEPH F. ADA
Lt. Governor

Attachment

cc: BBMR
NPS
OFFICE OF THE LT. GOVERNOR
GUAM STATE CLEARINGHOUSE
AGANA, GUAM

PROJECT NOTIFICATION AND REVIEW SIGNOFF

DATE RECEIVED: 8/26/82
REVIEW TERMINATED: 8/30/82

CLEARINGHOUSE ID: NPS82682WPGMPEA
APPLICANT PROJECT TITLE: War in the Pacific: General Management Plan and Its Environmental Assessment
APPLICANT AGENCY: United States Department of Interior
National Park Service War in the Pacific
ADDRESS: P.O. Box FA
Agana, Guam 96910

FEDERAL PROGRAM TITLE AND CATALOG NUMBER: War in the Pacific: General Management Plan and Its Environmental Assessment

FEDERAL AGENCY: 

AMOUNT OF FUNDS REQUESTED: LOCAL FEDERAL

PROJECT DESCRIPTION: 

The State Clearinghouse makes the following disposition concerning this application:

☐ reviewed and approved by Guam State Clearinghouse Procedures
☐ disapproved with the enclosed comments
☐ approved with the enclosed comments

Signature of Analyst attesting Compliance to State Clearinghouse 

APPROVED
DISAPPROVED

PAUL M. CALVO
GOVERNOR OF GUAM

DATE: SEP 9 1982

JOSEPH F. ADA
LIEUTENANT GOVERNOR
Memorandum

To: The Governor

From: Director, Bureau of Planning

Subject: War in the Pacific Management Plan and Environmental Assessment

After careful review of the draft General Management Plan (GMP) and Environmental Assessment for the War in the Pacific National Park, the following comments are submitted:

1. The park area discussed for development and management totals 967 land acres and 1002 water acres, with additional land acreage proposed for inclusion. Given the extremely narrow scope of War in the Pacific interpretation proposed (the July 21-30, 1944 battle to retake Guam), and the geographical discontinuity of the park segments, it is felt that greater concentration of efforts should be expended in those areas that would be of major significance in portraying that one, short battle.

2. Public Law 95-348 passed August 18, 1978 directs the Secretary of Interior to employ and train residents of Guam or of the Northern Mariana Islands to develop, maintain and administer the Park. Nearly four years after passage of the law, the only residents hired by the Park are groundskeepers. Efforts should be instituted immediately to employ residents to develop, maintain and administer the park.
3. Statements made throughout the two documents indicate a general lack of knowledge about the Chamorro people and their customs. This is an indication of the problem presented by the lack of utilization of residents in developing the park plan. Specific errors are:

A. Page 20, Paragraph 5 of the General Management Plan (GMP) states: "...The Chamorro language has survived the numerous changes in administration and cultural impacts and is still commonly used by residents throughout Guam."

The Chamorro language, like all cultural aspects has changed over the years and now includes elements of Spanish and English.

B. The term "Fiesta" is misused on Page 45, Paragraph 8 of the GMP. A wake is not a fiesta, but rather the final day of a wake is called "Finagpo Lisayo". A "fiesta" is traditionally a feast day celebrating the patron saint of the village.

C. Page 40, Paragraph 2 of the GMP; "Shoreline picnicking is an established traditional cultural activity for the local Chamorro population. ... It is important to recognize this as an activity unique to Guam ... ."

This statement is beyond comment.

4. While we recognize the fact that Japanese tourists will comprise a large portion of the park visitors and past brutality need not be over-emphasized, care should be taken not to white wash the facts of the occupation period. Page 9, Paragraph 5 of the GMP states: "Japanese language schools were started and Guamanians were taught to bow." This statement would lead one to believe the Guamanians attended a finishing school. If statements such as this are to be made, they should indicate the extreme cruelty and brutality inflicted on the population as a part of the teaching process.

5. Page 21, Paragraph 1 of the GCMP states: "In 1971, Guam's Citizens elected their first Governor and Territorial Legislature."

In 1970 Guam's citizens, for the first time, elected their Governor. The first election of the Territorial Legislature took place in 1950. Since the proposed park is supposed to interpret history, it is hoped that greater care will be taken in presenting facts than is shown here.
6. Page 52, Paragraph 1 of the Environmental Assessment states: "The previously altered reef structure near Asan Point will be returned as nearly as possibly to its natural state."

The Bureau of Planning's Guam Coastal Management Program must be informed as to how they propose to accomplish this project.

7. The Environmental Assessment is insufficient for analysis of environmental impact.

8. The plan indicates that the overwhelming emphasis will be focused on the relatively short battle to retake Guam. This is not in keeping with the intent of Public Law 95-348, which is to commemorate the... campaigns of the Pacific Theater of World War II.

9. Page 43, last paragraph of the GMP states: "Since many Japanese died in the battle for Guam and elsewhere in the Pacific, Japanese visitors are interested in some type of memorialization of their war dead."

There is already a Japanese memorial to their war dead on Guam. This section suggests another memorial to the Japanese war dead which is unnecessary. Rather the park should provide a memorial to the American, allied, and Pacific Islanders war dead.

It is hoped that when interpretation is complete and presented to the public, major emphasis will be placed on showing the contributions and sacrifices of that group who suffered most, displayed the greatest amount of courage and were most affected by the battle for Guam, the Guamanians.

Thank you for the opportunity to review these documents.

BETTY S. GUERRERO
Memorandum

To: Executive Assistant

From: Director, Bureau of Budget and Management Research

Subject: Comments on DOI/National Park Services' War In The Pacific Park Plan

Pursuant to your request to provide comments on the subject plan, the Bureau submits its findings. The document before review is the culmination of 4 years of work required under U.S. Public Law 95-348. The act under Section 6 provided for the designation of several sites on Guam to be a part of the National Park system. The plan reflects the general concepts of management and use of the park, as well as, a general inventory of areas of particular concern. The plan is limited to six units on Guam now authorized for Federal acquisition, as well as adjacent lands studied for possible addition to those units. In total the park will affect 957 land acres and 1,002 water acres.

While the Bureau is cognizant of the benefits that will be enjoyed from the development of the park, some issues as they relate to existing Federal land uses and policies are important items to be discussed. The Bureau understands that the Federal Government now controls 1/3 or 44,500 acres of land resources on Guam, of which, approximately 96% is under the direct control of the Department of Defense. There are current efforts being made to negotiate the release of roughly 5,000 acres determined by the Department of the Navy as no longer within the framework of its land use plan. The Government of Guam, thru the Bureau of Planning's pursuit of these lands, have been met with tighter requirements and may ultimately affect Guam's ability to pursue economic growth programs.

Again, the Bureau certainly agrees that there are benefits that comes with the establishment of the Park especially with respect to the tourist industry, however, the tightening of administrative requirements governing the releaseable Federal lands will adversely affect Guam's ability to become more self-sufficient. It is therefore important that the Government stress the need to address the Federal land use practices and to negotiate beneficial land transactions for all on Guam. In the framework of the plan in questions, the Bureau does not file an adverse response. Approval of the plan with noted concerns is recommended.

ALFRED B. PANGELINAN
October 22, 1982

Mr. T.S. Newman, Superintendent  
National Park Service, Guam  
P.O. Box FA  
Agana, Guam 96910

Dear Stell:

I reviewed the Draft General Management Plan for War in the Pacific National Historical Park and found it to be a thorough and well written document. No where could I find any statements that would have an adverse impact on Guam's environmental, cultural, and economic resources. The manner in which the plan addresses each aspect from introduction through the appendices makes it highly readable and easily understandable.

My only criticism is with seven plant names that were misspelled. On page 16, "jojo" should be joga, "lismas" should be lianas and "acicennia" should be avicennia. On page 17, "Nanasco" should be Nanaso while on page 37 "Alyxia forresiana" should be Alyxia tortresiana and "latifolia" should be latifolia. These minor spelling errors, however do not detract from the plan's overall usefulness. You and your staff are to be commended for the preparation and development of this plan.

Let us hope that the objectives can be implemented to assure that the park's purpose will be fully attained. You do have a good plan with which to work.

Sincerely yours,

WILLIAM S. NULL  
Territorial Forester
Superintendent Stell Newman
War in the Pacific National
Historical Park
Post Office Box FA
Agana, Guam 96910

Dear Mr. Newman:

The Guam Environmental Protection Agency has reviewed the Draft General Management Plan and Environmental Assessment for the War in the Pacific National Historic Park, and overall we feel that the Park will have a positive impact on Guam's environment.

However we also feel that there are several issues which are inadequately addressed in the Environmental Assessment. We realize that some impacts cannot be discussed in detail at this time. However the Assessment should include potential impacts as well as identify general measures for mitigating these impacts.

1. Restoration of reef areas at Asan Point and Gaan Point could have a serious impact if siltation is not controlled. The use of silt screens and/or conducting the work only during low tides may be necessary to prevent disturbed fill materials from becoming suspended in water and affecting nearby reefs.

2. Page 52, #2 of the Environmental Assessment indicates that erosion will result from construction of park facilities. The Guam Erosion and Sediment Control Regulations, administered by GEPA, require that all measures be taken to control erosion during most types of construction. We trust you will implement such measures, and therefore no erosion will result.

3. Likewise removal of tangenagen will increase erosion potential and should therefore be done carefully. It is unclear how the removal will be done. We would be most concerned about use of herbicides or the use of heavy equipment. Is it possible at this time to be more specific about how removal will take place? Regardless of how the plants are removed, we suggest that only small areas be cleared and be replanted or allowed to revegetate before adjacent areas are cleared. This should reduce the erosion potential.

4. The impact of relocating residents of Asan, Piti and Agat seems to be somewhat glossed over. If this information is available in another document, we suggest that it at least be summarized in the Environmental Assessment. It would be valuable to include an estimate of the total number of families to be relocated and the total number of parcels, inhabited or not, to be purchased.

"ALL LIVING THINGS OF THE EARTH ARE ONE"
Finally we are concerned about the statement on water supply which appears on page 45 of the General Management Plan and Page 32 (#8) of the Environmental Assessment. It is true that Guam's water supply is finite, from the standpoint of the amount of water that can be safely pumped out of the northern groundwater lenses. However it is somewhat misleading to state that the water supply "will become a problem soon ..." First, the Northern Guam Lens Study has shown that there is more freshwater available that was previously estimated. Secondly, Guam presently uses less than half of the estimated amount available. Finally, the rate of population growth has showed (the 1980 census figure was less than had been estimated during the 1970's). Therefore we suggest you modify the water supply statement.

Thank you for the opportunity to comment on the Management Plan and Environmental Assessment. Should you have any questions regarding our comments, please call us.

Sincerely yours,

RICARDO C. DUENAS
Administrator
September 9, 1982

Mr. Stell Newman, Superintendent
War in the Pacific National Historical Park
P.O. Box FA
Agana, Guam 96910

Dear Superintendent Newman:

The National Parks & Conservation Association (NPCA) appreciates this opportunity to comment on the Draft General Management Plan and the Environmental Assessment for the War in the Pacific National Historical Park.

We would like to comment on several areas, including: the scope of the park; historical research and interpretation; preservation of historic structures and artifacts; development and recreation; and, local hiring.

Scope of the Park

Section 6(h) of the establishing Act, P.L. 95-348, requires the Secretary, through the Director of the National Park Service to conduct "a study of additional areas and sites associated with the Pacific campaign of World War II," This study was to include other geographical locations within the Trust Territory of the Pacific Islands. The Draft GMP does not refer to this requirement nor to whether additional sites were actually considered outside of Guam. If the study was done, the Draft should indicate what sites were considered and why no recommendations were made. Since this park is to represent the entire Pacific conflict, other locations in the Pacific should be considered, either now, or in the future. This action would necessarily require the cooperation of other governments in the "Pacific Theater."

While this is an important aspect of the future scope of the park, the present task of completing research on identified sites in Guam and the Northern Mariana Islands as required by P.L. 95-348, should take precedence. NPCA supports such research since completion of these studies and surveys on land and offshore areas will help determine which areas should be included in the park. Efforts to locate and identify significant sites will minimize the need for continual legislative boundary adjustments in the future, and their possible loss through development.

During the preparation of the GMP, we should not lose sight of the current budget restraints. Unless there is some ranking of sites by priority, acquisition will be spotty at best. If possible, acquisition priorities should closely parallel the sites identified as essential to the interpretive program so that visitors can get a good sense of the events of the war before the park is fully acquired.
Historical Research and Interpretation

Academic research on the war in the Pacific drawn from NPS park historians as well as historians from Guam and Japan will ensure that inaccuracies are corrected prior to the preparation of the interpretive program. Every effort should be made to seek the advise of as many qualified historians on this subject as possible, as provided by Section 6(f) of the Act.

The location of the park and the large percentage of Japanese visitors offers the NPS an interesting challenge in interpreting the events of the war. As the Draft suggests, explanations of the conflict in an unbiased a manner as possible should provide a good experience for all of the park's visitors.

The first responsibility for interpretation, though, is the events of the war in the Pacific. Other important areas for interpretation include the natural history of the Island, the cultural changes of its inhabitants, and the outstanding natural and scenic values on the Island of Guam, including offshore areas.

Our major argument with the Draft is the NPS reliance on the tour operators to decide which routes would be used to take visitors through the park (p. 61). The NPS interpretation program should determine which routes are used, and not the preference of tour operators.

Preservation of Historic Structures and Artifacts

The results of a recent survey entitled "Cultural Resource Threats" done by the NPS at the request of the House Interior and Insular Affairs Committee, indicates a greater need in caring for the objects and artifacts within the Park System. The major deficiencies include inadequate storage facilities with little or no climate-controlled equipment. These have been the major cause of the loss or damage to many items under the care of the NPS.

These facts are important to note in this discussion since Guam's climate requires special consideration in caring for the metal objects associated with the park. The special conditions listed in the Draft indicate an awareness of the problems encountered Servicewide. However, no suggestions were given as to how this park will cope with (1) locating a reasonably protected area to serve the visitor as a museum; (2) providing climate-controlled facilities necessary to store and display park-related materials; (3) preparing a scope of collections and collection preservation guide for the park; or (4) protecting historic structures through a preservation maintenance program.

The extreme climatic conditions of Guam requires careful consideration for preserving and protecting sites and objects. But the Draft states that such considerations will be handled in the future by the Territorial HPO and the NPS. Unfortunately,
this process eliminates the opportunity for the public to respond to recommendations in the Draft that could have a significant impact on objects that are of major importance to the park.

Further, until decisions are made as to how and where objects will be stored/displayed, efforts to obtain additional war-related items should be a low priority.

Development and Recreation

These subjects are being considered together because of the inherent conflicts of each on the park. From the outset, NPCA does not support the use of any historical park unit as a local recreation area. Pressure to provide needed recreation for local citizens is a growing problem in many historical parks.

The ongoing process on Guam of streamlining park unit boundaries to protect only nationally significant resources should also consider the limited recreational opportunities on the island. The NPS should be working closely with the Guam Department of Parks and Recreation to avoid inclusion of high-potential recreational lands within the War in the Pacific NHP. Cooperation with the Department could allow the development of recreational lands adjacent to the park in such a manner as to prevent their intrusion upon the park visitor and the historic scene. In order to accommodate the obvious need for places for public outdoor recreation, and more importantly, in order to provide needed protection for some of the beautiful beaches of Guam, the NPS should again pursue the proposal for a Guam National Seashore.

It is not the responsibility of the NPS to provide and maintain local recreation. Interpretative trails to points of interest, underwater trails to WWII artifacts or outstanding underwater scenes, and picnic areas are the extend of "recreational" developments that should be provided by the NPS.

The financial commitment by the NPS has a number of other priorities such as land acquisition, protection and preservation of the resource, and interpretation. Sports and other such organized recreation have no place in an historical park.

Any developments in the park should be very carefully designed and located in order to protect the historic scene and to prevent the loss of archeological remains (completion of archeological surveys also help protect those sites).

In the history of park development, many mistakes have been made regarding placement of a facility over, or too near an historic or archeological site. The historic scene is a vital component of many military parks because of the role that the particular geographical layout played in the success or failure of a military encounter. For this reason, every effort should be made to coordinate and cooperate with other governmental entities to prevent an action that could destroy the integrity of this scene.
By the same token, the NPS should take care to prevent internal developments that would become intrusions on the historic scene.

**Park Employees**

As past experience demonstrates, the good will of a nearby community is directly related to how far that community will go to protect the lands adjacent to a national park. Local involvement in park activities in the past has meant the difference between compatible and incompatible development on adjacent lands.

Local involvement at the War in the Pacific NHP, however, is even more important because of the requirement of the law "... to employ and train residents of Guam or of the Northern Mariana Islands to develop, maintain, and administer the park."

This requirement should be enforced to the greatest extent possible. If the residents of the 210-square-mile island develop a strong resentment to the NPS and the park, it will become very difficult for the residents and the park to coexist. The future success of the park depends upon the quality of this relationship. NPCA strongly supports the provision of law that states: "The Secretary is authorized and directed to the maximum extent feasible to employ and train residents of Guam or of the Northern Mariana Islands to develop, maintain, and administer the park."

We urge total compliance with this provision by the NPS.

We are proud of our association with the Marianas Recreation and Parks Society and give our general support to the more detailed comments submitted by them.

Thank you for the opportunity to submit these comments.

Sincerely,

Laura L. Beaty
Administrative Assistant
Historic Heritage
MARIANAS RECREATION AND PARKS SOCIETY

August 3, 1982

Mr. Stell Newman, Superintendent
War in the Pacific National Historical Park
P. O. Box FA
Agana, Guam 96910

Dear Mr. Newman:

The members of the Marianas Recreation and Parks Society enthusiastically support and endorse the concept of a National Historical Park commemorating the bravery of the soldiers of the War in the Pacific. In fact, several of our members were instrumental in developing the basic groundwork for the park and its legislation.

Furthermore, Guam would seem to be the ideal location for such a park. The Guamanians, through their loyalty, suffered as an occupied territory during the War and the island reflects a true picture of much of the Second World War in the Pacific.

The committee members of the MRPS reviewing the General Management Plan for the War in the Pacific National Historical Park bring together many years of professional experience in park and related matters. They are concerned both about the accurate historical account of the Pacific theater of the War, as well as the future of Guam and its population.

It is with this combined experience and professional interest in Parks and Recreation on Guam that we present our comments and conclusions highlighting our important concerns and including technical items in an appendix.

We ask that the National Park Service and others who read this letter realize that these are offered as constructive criticisms made in hopes that the best possible National Historical Park will result due to the joint efforts of those reviewing and rewriting the General Management Plan.

First, we wish to address several items in relation to the Park's enabling legislation, Section 6 of P.L. 95-348. We feel that the legislation established important management requirements that should be addressed in the beginning of the plan concurrent with the management objectives, rather than being hidden under a statement of "Special Influences on Management". (p. 42)

We are concerned that the Plan does not fully meet the requirements to commemorate the campaigns of the Pacific theater of World War II, which is probably the most important event of this century and resulted in the United States being thrust into world leadership. In addition, it is important to remember that this Park is the sole National Park Service unit commemorating the Pacific War.
Thus, the Park should commemorate and interpret not only the battles of the Marianas, but also such battles as, but not limited to, Pearl Harbor, Midway, Guadalcanal, the Aleutians, island hopping, the Philippines, submarine operations, strategic bombing, the atomic bombs, causes of the war, the results, and the terrible cost of the War and other nationalities involved.

Since the war in the Pacific was basically a naval war, we are concerned that the Plan gives no background, analysis, or detailed plan to exhibit a naval warship as required by the law. We feel it is important to berth and display a naval ship as an integral component of the Park. We feel that with the limited number of World War II ships left in the U.S. Navy, that action should be taken immediately. (See Appendix C.)

The law gives considerable emphasis toward proper interpretation of the War in the Pacific. We concur, that interpretation will be the key component of the Park to provide visitors with an understanding and appreciation of the important events of the war. While we commend the opening of the Museum in the Park, we still feel that as presently stated in the Plan, interpretation is not sufficiently addressed to illustrate how visitors will be related to the tangible remains of the historic scene, features, objects, and events. Additional planning should be given relative to information, orientation, interpretive activities, presentations, displays, environmental education, volunteers in parks, and cooperative associations and how they tell the story of the Pacific War and the Guam Liberation as an example of amphibious warfare.

Inappropriate interpretation and specific interpretive elements should not be attempted until adequately planned and an interpretative prospectus is completed. We understand work has started on a prospectus in May 1982. For example, we are concerned about the use of the series "Blood and Sands of Guam" whose translation was funded by the National Parks Service because we have noted some inconsistency within the series. (Note Appendix E.) We also suggest a review of similar literature available in Japan or the Pacific Region if not already accomplished.

With the limited financial resources of the Park at present, the interpretive prospectus would give priorities for interpretation. For example, an underwater trail is an excellent idea if relating to the War and traveling to a submerged artifact. However, such a trail just along the reef is questionable in light of limited funds and the legal requirement to interpret "outstanding values". The underwater trail should be included in the revised General Management Plan with emphasis on submerged artifacts. We are including a listing of interpretive techniques in Appendix D for your use. Also, we would suggest that the Plan include a complete bibliography including a listing of references, scholars, participants, and experts consulted for the Park.

Related to interpretation is the acquisition of artifacts and the restoration of the artifacts and other historic features. No rational or plan is given for restoring features such as pillboxes or guns. We believe that the Piti guns should be restored. In addition, a section of the coastline, such as the area immediately south of Gaan Point should be restored as much as possible to the appearance of the morning of July 21, 1944.
We also recommend that the park compose a comprehensive listing of military equipment from the War to acquire. It should include among other items planes, tanks, and the Japanese submarine at Naval Station. Also, there are intact Japanese planes on Taroa in the Marshalls to be acquired. (For a partial listing of aircraft see Appendix H.) Study should be given to an aircraft exhibit at the airport.

We feel that the listing of other significant sites to be marked on Guam is inadequate. Omitted are the following that were important in World War II: Plaza de Espana; Merizo and other massacre and internment sites; airfields and related areas; Orote Peninsula battle sites; other Japanese fortifications including those in Tumon, Dungcas Beach and along the east cost; and submerged features including the ships and airplanes in Apra Harbor. Accessibility to the sites should also be studied.

Our Society is increasingly concerned about the legal requirement to hire and train residents of Guam and the Northern Mariana Islands to develop, maintain and administer the park. No residents have ever been allowed to apply for, let alone be hired to positions, to develop or administer the park, only to maintain. Our option indicates that every position in the park should be occupied by a resident. (Appendix F)

Instead we witness three sections of the Plan (pp. 3, 42 & 68) that address this hiring requirement. Each of these sections is inconsistent with the other sections.

The present de facto hiring policy simply gives the attitude that residents are not qualified for the positions. However, an objective evaluation would conclude that hiring residents would produce highly qualified employees, and the historical inaccuracies of the "Blood and Sands" series and the obvious health problems of the once proposed Gaan Point underwater trail would have been avoided from the start. Related is the policy to bring off-island officials to Guam when better qualified professionals could and should be consulted. A good example of the value of locally hired employees is the contribution of the Young Adult Conservation Corps made to the Park. The youth were familiar with the terrain and how to work in a particular social and natural environment. This example applies to both administration and maintenance. This program, employing local residents under local leadership, has given the park the only visible components for public use.

We are also concerned about the lack of prompt action to purchase land for the Park. $576,555 was appropriated by Congress in FY 79 for this purpose with less than an acre being purchased to date. We feel that the idea to exchange land for the park is excellent since it would acquire the park land promptly, reduce costs, and insure continued land ownership by the present land owners. We do recommend the addition of the Navy owned western slope of Mount Alifan to the top to protect the critical objective of the Agat landing.

We have also noted little action to transfer Government of Guam land to the park. We do feel that a summary of the land acquisition plan should be included within this Plan. We also recommend that the Park Service acquire fee title to the lands that were acquired by quit claim deed from the Government of Guam which in most cases did not have clear title.
We do concur with the Plan's analysis concerning the unrealistic authorization figures for development. However, we question the applicability of the "isolation factor". Its conclusion implies that off-island contractors will be used for the projects, as indicated by the hiring of a firm from New Jersey to do the Museum displays. We feel that firms on Guam should be given the opportunity for such work. Related, we feel there should be a design motif adopted for the park and that development be prioritized or phased.

We feel it is important to complete a survey of the submerged areas for historic features prior to completing the general management plan. We are also concerned that the plan was not completed within the given congressional deadline.

Finally, we feel that sections based upon legislative authority should quote the law verbatim to avoid changing the meaning. Then the section should expand upon how the individual legislative directive will be implemented.

Our next series of comments relates to planning, management, policies and other legal requirements.

One of the policies of the park service is to "perpetuate the historic scene in a manner appropriate to each historic place". We have noted little concern about the placement of the second proposed drainage ditch from Asan Village which would radically alter the historic scene of Asan Beach which should be planned to restore the historic scene. We also feel the proposed Interpretive Facility of Asan Point will intrude upon the historic scene.

We are also concerned that the Plan contains no compliance documents relative to 36 CFR 800 since the plan is a Federal action on site(s) listed on the National Register of Historic Places. We are even further concerned that the Natural and Cultural Resource Management Plan An Addendum to the General Management Plan dated February 1982 describes proposed actions on National Register sites and has been fully approved internally by the National Park Service. This document should be integrated with the plan, reviewed concurrently, and is legally subject to historic preservation compliance.

We are further concerned that the Environmental Assessment states on page 1 that the usual public involvement program was not used. We see no reason to not use the public involvement program for the Park.

We have noted that the Plan does not address specific staffing, operation costs on an annual basis, memorials and concessions. We feel that these are important points to be included within the Plan.

We feel that insufficient discussion, rationale, and conclusions are given relative to recreation in relation to preservation. For example, shoreline picnicking is viewed as a Chamorro cultural activity in the Plan, when in fact it is an activity of all residents and visitors to Guam. We feel that such activities should be allowed, but not encouraged, to the point of large fiestas in the Park. Other activities previously allowed in the Park but not requiring large developments, such as fishing, snorkeling, scuba diving, hiking, food gathering, and photography should be allowed. Hunting in the Park should also be addressed.
It is also felt that the additional research and study be given to a visitors use section including patterns of use whether by residents, veterans, military, school groups, bus tours, individual tours, or by other population components. Each of these should be presented an orderly pattern to see the Park and learn about World War II. For example, an orientation to visitors at the Visitors Center to the War in the Pacific followed by a logical visit to the other park units to tell the story of the War.

Many different cultures and societies engaged in the War in the Pacific. The factual presentation of the events of the War should not be altered to accommodate the perception of the events by any one culture or society.

We feel the NPS should acknowledge the individuals or agencies that have assisted in this Plan and as a professional organization, we feel that proper and complete credit should be given in the listing of study participants.

The Plan needs to address how other groups will be attracted to the Park. We suggest that the National Park Service, working with the Government of Guam and the community, develop a responsible program to attract a diverse group of off-island visitors to the Park. This program should be addressed by the Plan.

In conclusion, we feel that the Park offers exciting opportunities. Our comments have indicated what we believe are the Plan's limitations. Also, we have shown our concern for what we believe has been slow progress on the land acquisition, planning, and development of the Park. We hope our comments will be received in the same spirit in which they have been prepared. That spirit is one of support and enthusiasm for the War in the Pacific National Historical Park. As a group, we are prepared to continue to assist the National Park Service in what we believe will be an internationally recognized Park.

Attached to this testimony are the previously stated appendices plus detailed comments on each of the documents.

Thank you for allowing our organization to offer these comments.

Sincerely,

Peter R. Meylan
President

David T. Lotz
Chairman Review Committee

Attachment(s)
THE FOLLOWING APPENDIXES "A", "B", and "K" ARE ATTACHMENTS TO THE LETTER FROM MARIANAS RECREATION AND PARK SOCIETY.

APPENDIXES "C" THROUGH "J" ARE NOT INCLUDED SINCE THEY REQUIRED NO RESPONSE.
APPENDIX A

TECHNICAL CORRECTIONS ON THE DRAFT GENERAL MANAGEMENT PLAN, WAR IN THE PACIFIC NATIONAL HISTORICAL PARK


<table>
<thead>
<tr>
<th>Page</th>
<th>Paragraph</th>
<th>Suggested Correction</th>
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<tbody>
<tr>
<td>3</td>
<td>4</td>
<td>The scope of acquiring artifacts should be greatly expanded. Thus this statement of management objectives should simply state that preferred artifacts will be acquired through a program.</td>
</tr>
<tr>
<td>3</td>
<td>6</td>
<td>While we feel that interpretive programs should be in the three languages, we feel that involvement in developing the programs is too limited and should be greatly expanded to include Americans and others involved in the War.</td>
</tr>
<tr>
<td>3</td>
<td>7</td>
<td>We feel that the existing tour pattern will change based upon the facilities offered by the Park and this change should be reflected in the management objectives.</td>
</tr>
<tr>
<td>3</td>
<td>9</td>
<td>The management objective to hire residents should quote the law to avoid any alterations in the law's meaning. We would suggest that the NPS establish specific yearly goals for the positions listed to be filled by residents. In some cases training programs are not needed. Rather, simply announcing the positions will result in fully qualified applicants.</td>
</tr>
<tr>
<td>3</td>
<td>10</td>
<td>We believe that training should be reciprocal between NPS employees and professionals on Guam. We feel that Guam professionals have much to offer the Park in valuable skills.</td>
</tr>
<tr>
<td>4</td>
<td>12</td>
<td>Our comments for Page 3, Paragraph 10 applies here.</td>
</tr>
<tr>
<td>5</td>
<td>2</td>
<td>Many other nationalities were involved in the Pacific War and should be included here such as Filipinos, Chinese, Micronesians, English, Dutch, Australian, New Zealanders, etc.</td>
</tr>
<tr>
<td>8</td>
<td>6</td>
<td>This statement should be verified. It does not agree with Complete History of Guam by Carano and Sanchez.</td>
</tr>
<tr>
<td>9</td>
<td>5</td>
<td>This statement should be verified. It does not agree with Carano and Sanchez.</td>
</tr>
<tr>
<td>11</td>
<td></td>
<td>Guam map Only one base is shown. The Navy bases should be shown.</td>
</tr>
<tr>
<td>12</td>
<td></td>
<td>Battle maps The incorrect park boundary is shown on the maps. And, the coastline has changed since the invasion.</td>
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<td>Page</td>
<td>Paragraph</td>
<td>Response</td>
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<tr>
<td>3</td>
<td>4</td>
<td>Objective considered adequate. No change.</td>
</tr>
<tr>
<td>3</td>
<td>6</td>
<td>Objective unique to Guam Park and required by legislation. No change.</td>
</tr>
<tr>
<td>3</td>
<td>7</td>
<td>Text changed to reflect suggestion.</td>
</tr>
<tr>
<td>3</td>
<td>9</td>
<td>Text changed to refer to legislation as well as state NPS objective.</td>
</tr>
<tr>
<td>3</td>
<td>10</td>
<td>Text changed to reflect suggestion.</td>
</tr>
<tr>
<td>4</td>
<td>12</td>
<td>Same as previous.</td>
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<tr>
<td>5</td>
<td>2</td>
<td>Considered editorial. No change necessary.</td>
</tr>
<tr>
<td>8</td>
<td>6</td>
<td>No change. Will be checked by historians.</td>
</tr>
<tr>
<td>9</td>
<td>5</td>
<td>No change, will be checked by historians.</td>
</tr>
<tr>
<td>11</td>
<td>Guam map</td>
<td>Map corrected.</td>
</tr>
<tr>
<td>12</td>
<td>Battle maps</td>
<td>Map corrected.</td>
</tr>
</tbody>
</table>
12 1 The date for securing the beachhead does not agree with Carano and Sanchez. It should be verified.

16 4 At present 90% of northern Guam is not covered by the climax limestone forest. A considerable amount is developed and covered by a shrub community on disturbed areas.

16 7 The Barringtonia swamp is not at the mouth of the Talofofo River, but is a short distance upstream.

17 2 Tangantangan grows only on limestone or limestone soils.

17 3-5 Many animals are not mentioned including, but not limited to, coconut crabs and many bird species.

18 6 Northwest Orient and South Pacific Island Airways serve Guam.

20 5 The Chamorro language has evolved over the years and presently includes many Spanish words.

21 1 The Guam Legislature was established in 1951 not 1971. This section should be updated to reflect the political status referendum held on Guam in early 1982.

22 Table II Table II should be updated to show visitor arrivals for 1981 and 1980. Likewise, the arrivals by cruise ships should include 1980 and 1981.

25 1 The existing road to Mt. Tenjo is more appropriate to describe as four wheel drive rather than impassible.

25 5 There is no longer a baseball field in the Agat Unit. Additional recreation activities within the unit should include scuba diving, snorkeling and fishing. Food gathering should be defined.

26 3 Adelup Point contains the remains of the Atkins-Kroll House at the high point of the point.

26 4 This section should specify that Asan Village moved from the old Asan Annex site to the present location further east.

26 5 Nearby to the Mabini Monument was the Asan Presidio where Filipino revolutionaries were kept during both the Spanish and American rule of the Philippines.

27 6 There were no American guns on Mt. Tenjo and Mt. Chachao which played a role in World War I.
<table>
<thead>
<tr>
<th>Page</th>
<th>Paragraph</th>
<th>Notes</th>
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<tbody>
<tr>
<td>12</td>
<td>1</td>
<td>No change. Will be checked by historians.</td>
</tr>
<tr>
<td>16</td>
<td>4</td>
<td>Minor editorial change made.</td>
</tr>
<tr>
<td>16</td>
<td>7</td>
<td>Minor correction made.</td>
</tr>
<tr>
<td>17</td>
<td>2</td>
<td>No change.</td>
</tr>
<tr>
<td>17</td>
<td>3-5</td>
<td>Considered editorial. No change made.</td>
</tr>
<tr>
<td>18</td>
<td>6</td>
<td>Minor editorial. Correction made.</td>
</tr>
<tr>
<td>20</td>
<td>5</td>
<td>Text changed to reflect comment.</td>
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<tr>
<td>21</td>
<td>1</td>
<td>Corrected.</td>
</tr>
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<td>22</td>
<td>Table II</td>
<td>Will be added in final document.</td>
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<td>25</td>
<td>1</td>
<td>Editorial. Sentence removed.</td>
</tr>
<tr>
<td>25</td>
<td>5</td>
<td>Correction made on baseball field, others editorial. No change.</td>
</tr>
<tr>
<td>26</td>
<td>3</td>
<td>Data provided to historians.</td>
</tr>
<tr>
<td>26</td>
<td>4</td>
<td>Correction made. Details will be checked by historians.</td>
</tr>
<tr>
<td>26</td>
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<td>Data provided to historians.</td>
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</tr>
<tr>
<td>28</td>
<td>1</td>
<td>The pre-War dam on the Asan River for water supply still exists.</td>
</tr>
<tr>
<td>28</td>
<td>4</td>
<td>The quarry, although possibly smaller, did exist during the War.</td>
</tr>
<tr>
<td>29</td>
<td>6</td>
<td>It should be noted that Agat Village has been moved south after the War.</td>
</tr>
<tr>
<td>32</td>
<td>4</td>
<td>There were two Guamanian Catholic priests on the island during the War, Father Duenas and Father Calvo. One Baptist minister was also on the island, Reverend Sablan.</td>
</tr>
<tr>
<td>34</td>
<td></td>
<td>Numerous additional significant sites need to be included. Please note the text of the testimony.</td>
</tr>
<tr>
<td>35</td>
<td>3</td>
<td>Asan Inland Unit contains a limestone forest on the northern half and a savanna grassland on the south. This indicates limestone rock on the north and volcanic rock on the south.</td>
</tr>
<tr>
<td>36</td>
<td>1</td>
<td>It should be noted that tangantangan grows only on alkaline soils which are generally limestone soils.</td>
</tr>
<tr>
<td>36</td>
<td>3</td>
<td>Fort Apugal is Fort Santa Agueda and there are no Navy housing at the fort. They are adjacent at Naval Regional Medical Center. The fort is at Apugan.</td>
</tr>
<tr>
<td>37</td>
<td>2 &amp; 6</td>
<td>These sections should be revised to reflect the official listing of rare and endangered species.</td>
</tr>
<tr>
<td>37</td>
<td>4</td>
<td>Additional species such as the Guam deer and the wild pig should be included. We seriously doubt if the Spanish brought the monitor lizard to Guam. The same holds for the toad as a food source.</td>
</tr>
<tr>
<td>40</td>
<td></td>
<td>Recreation should be viewed from the overall Guam perspective and then focus on the appropriate segment that the Park will serve. We feel that the survey conducted by the Department of Parks and Recreation and presented in the 1980 Guam Comprehensive Outdoor Recreation Plan is an excellent starting point. Then we feel that a comprehensive policy should be outlined for low density recreation that requires minimal development and does not infringe upon the historic scene. As such we believe that Asan Beach Unit is inappropriate for large fiestas which generally take place near the church and at residences. However, we do believe that Asan Point should be opened up immediately especially since a scenic vista sign has been installed. Also swimming should be allowed at the swimming hole inside the reef.</td>
</tr>
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<td>28</td>
<td>1</td>
<td>Data to be checked by historians.</td>
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<tr>
<td>28</td>
<td>4</td>
<td>Detail to be checked by historians.</td>
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<tr>
<td>29</td>
<td>6</td>
<td>Correction made.</td>
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<tr>
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<td>4</td>
<td>Detail to be checked by historians.</td>
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<tr>
<td>34</td>
<td></td>
<td>Notation made in text at beginning of this section.</td>
</tr>
<tr>
<td>35</td>
<td>3</td>
<td>Editorial; reference is to island, not Asan. No change.</td>
</tr>
<tr>
<td>36</td>
<td>1</td>
<td>Editorial; this is explained elsewhere. Minor change made.</td>
</tr>
<tr>
<td>36</td>
<td>3</td>
<td>Minor change made.</td>
</tr>
<tr>
<td>37</td>
<td>2 &amp; 6</td>
<td>Document updated with most recent information.</td>
</tr>
<tr>
<td>37</td>
<td>4</td>
<td>Additions made. Data provided for NPS naturalists.</td>
</tr>
<tr>
<td>40</td>
<td></td>
<td>Agree, except for use of Asan Point for large gatherings. No change necessary.</td>
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</tbody>
</table>
While dangerous during certain sea conditions, scuba diving is done in Asan Bay. There is an LVT offshore to dive to.

When considering recreation, the NPS should also address such problems as safety, concessions and restrooms.

Please note the text of the testimony here regarding legislative mandates.

The assumption of a legal requirement to acquire all land in fee simple is incorrect. It is a management decision, not a legal decision.

We disagree that there is limited local knowledge about national parks and that preservation of the historic scene is not locally accepted.

Tourism started in the late 1960s. We disagree with the first statement. We do feel that a segment of the resident population of Guam feels that tourism is an intrusion into their way of life. This problem should be objectively addressed.

While we believe that interpretation and development programs should be responsive to cultural and attitudinal differences, we do not agree that the programs should be labeled as sensitive. Rather they should be addressed as being objective and accurate.

This section suggests another memorial to the Japanese war dead which is unnecessary. Rather the Park should provide a memorial to all the war dead.

The site for a proposed Agat small boat harbor is now adjacent to Nimitz Beach.

This paragraph gives false concepts about the Government of Guam Department of Parks and Recreation. The first sentence uses the word "some" regarding water-oriented shoreline recreation facilities. This usage implies incomplete or limited facilities and is inappropriate without rationale to justify the statement. The second sentence gives the impression that the Department is not involved with historic preservation and interpretation. This is not correct since the Department has been the Guam agency for historic preservation since 1972 and has preserved such features as the Plaza de Espana, Agat Spanish Bridge, Fort San Jose, Merizo Bell Tower, Inarajan Historic District and many others. The Department has greatly assisted the NPS in implementing the Park. In addition, the Department recently installed the first series of interpretive signs on Guam at the Plaza de Espana with the cooperation of the Marianas Recreation and Park Society and Duty Free Shops.
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<td>40</td>
<td>5</td>
<td>Minor change made.</td>
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<td>40</td>
<td></td>
<td>Included in GMP and in more detailed planning. No concession proposed.</td>
</tr>
<tr>
<td>42</td>
<td></td>
<td>Noted.</td>
</tr>
<tr>
<td>43</td>
<td>1</td>
<td>Minor clarification made. Comment here misreads text.</td>
</tr>
<tr>
<td>43</td>
<td>2</td>
<td>Disagree with comment. No change.</td>
</tr>
<tr>
<td>43</td>
<td>3</td>
<td>Editorial comment. Minor clarification made.</td>
</tr>
<tr>
<td>43</td>
<td>4</td>
<td>Editorial comment. No change.</td>
</tr>
<tr>
<td>43</td>
<td>5</td>
<td>Section clarified.</td>
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<td>1</td>
<td>GMP updated.</td>
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<td>44</td>
<td>2</td>
<td>GMP clarified.</td>
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</table>
The plan should properly cite the islandwide plan by title, date, and exact status of the plan.

Additional information on historic vegetation patterns and fires should be obtained from the Government of Guam Department of Agriculture.

The water supply problems of Guam is being solved. This statement should reflect the current development.

We disagree about the lack of skilled craftsmen on Guam. For example, numerous organizations such as the University of Guam, RCA, Pacific Data and the military have expert professionals in computer science.

While fiestas are important, most beach or picnic outings are not fiestas. Also, the Asan memorial service is not a fiesta, it is a religious service.

We suggest that this section include information on local craft skills held by personnel such as the knowledge held by a former village redevelopment employee at the 4-H, Mrs. Alvarez.

This section should also include special conditions relative to dry rot and termites in wood, storm surge effects and siltation and coral growth rates.

This introductory paragraph should emphasize that this Park is the one and only park to commemorate World War II in the Pacific.

The significance of the botanical area should be explained in light of the legislative requirement to "conserve and interpret outstanding natural" features and such an explanation should be in relation to other natural areas on Guam.

An addition should be made to the Mt. Alifan Unit to include the peak of the mountain and the area between the peak and the existing Park unit in order to preserve a primary objective of the military attack. Access will be as high as possible in elevation to allow visitors an excellent panorama.

The section on interpretative concepts is too limited and incomplete. It should be a summary of the Interpretive Prospectus', once completed. We base this upon the following inadequacies noted in this section:

1. This is a national Park not a local park. The interpretive program should also address the international significance of the War.
<table>
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<th>Page</th>
<th>Paragraph</th>
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<tr>
<td>44</td>
<td>4</td>
<td>No change.</td>
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<tr>
<td>45</td>
<td>4</td>
<td>Agree. No change necessary in GMP.</td>
</tr>
<tr>
<td>44</td>
<td>6</td>
<td>GMP updated.</td>
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<tr>
<td>45</td>
<td>7</td>
<td>Statement deleted.</td>
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<tr>
<td>45</td>
<td>7</td>
<td>GMP clarified where appropriate.</td>
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<tr>
<td>45</td>
<td></td>
<td>Detail not necessary in GMP.</td>
</tr>
<tr>
<td>45</td>
<td></td>
<td>GMP clarified.</td>
</tr>
<tr>
<td>46</td>
<td>1</td>
<td>Comment incorrect. See previous discussion.</td>
</tr>
<tr>
<td>48</td>
<td>1</td>
<td>Minor change made in description.</td>
</tr>
<tr>
<td>48</td>
<td>4</td>
<td>Information provided to historians. See Assess-</td>
</tr>
<tr>
<td></td>
<td></td>
<td>ment for discussion of alternative access point.</td>
</tr>
<tr>
<td>55</td>
<td>1</td>
<td>No change except for addition of possible</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Interpretive Technique. More detail inappropriate for GMP.</td>
</tr>
</tbody>
</table>
2. Guam was a loyal American outpost occupied by the enemy.

3. The role of others in the War should be included here and not limited to Americans, Japanese and Pacific Islanders. For example, the Filipinos contribution to the War.

4. Asan Beach was the primary invasion beach.

5. An interpretive facility at Asan Point is appropriate to interpret the entire War. Attention should be given to the exhibit of a naval warship and aircraft. However, to interpret the entire War from Mt. Tenjo is inappropriate since they simply do not relate. Mt. Tenjo should be interpreted as the site of joining up the two invasion forces.

6. Each unit of the Park preserves a key component of the invasion battlefield and should be treated by interpretation as such.

7. There should be a direct relationship between the Park area, interpretive message, Park visitors', and interpretive technique in order to properly determine the most appropriate interpretive technique to use.

How will the reef at Asan Beach be restored? There is one damaged pillbox at the Asan Beach Unit. Any facility or outdoor exhibit space at Asan Point should be separated from the beach by landscape material so that the integrity of the historic scene of the invasion beach is achieved.

Mt. Alifan should receive significantly more use since a viewpoint at a high elevation in the unit yields a perspective of the entire Agat coastline including Orote Peninsula.

A historic artifacts survey of the underwater areas should be completed prior to completion of this Plan.

Visitors to the Park will not be from just two groups, but from a variety of nations and cultures although the predominant visitors will be American and Japanese.

While concepts should consider the Japanese attitudes, nevertheless, development programs should be objective and accurate.

This discussion omits that a considerable amount of the Park's visitors will be active duty U.S. military, their dependents, and other statesiders. Chamorros, not Chamorron.

We note a statement concerning an equipment display, but no listing. Please note the comments concerning this in the testimony text.
<table>
<thead>
<tr>
<th>Page</th>
<th>Paragraph</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>55</td>
<td>Cont.</td>
<td>2. No change. Editorial only.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3. Concept considered clear. No change.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>4. No change.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>5. No change in GMP, which includes overall concepts. Details will be provided in interpretive prospectus.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>6. No change in GMP, which includes overall concepts. Details will be provided in interpretive prospectus.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>7. No change in GMP, which includes overall concepts. Details will be provided in interpretive prospectus.</td>
</tr>
<tr>
<td>57</td>
<td>2</td>
<td>Text clarified.</td>
</tr>
<tr>
<td>58</td>
<td>4</td>
<td>No change--see discussion of Alternatives in Assessment.</td>
</tr>
<tr>
<td>59</td>
<td>2</td>
<td>See previous response. No change.</td>
</tr>
<tr>
<td>61</td>
<td>1</td>
<td>Agree. No change necessary.</td>
</tr>
<tr>
<td>61</td>
<td>2</td>
<td>No change. Point is emphasized in several places.</td>
</tr>
<tr>
<td>61</td>
<td>3</td>
<td>Text clarified and corrected.</td>
</tr>
<tr>
<td>61</td>
<td>1</td>
<td>Listing underway not appropriate to be included in GMP.</td>
</tr>
<tr>
<td>Page</td>
<td>Paragraph</td>
<td></td>
</tr>
<tr>
<td>------</td>
<td>-----------</td>
<td></td>
</tr>
<tr>
<td>62</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td></td>
<td>The memorial at Asan Point should be to all who died in the War. The statement that &quot;The only memorials or monuments in the Park related to World War II will be this proposed memorial, the small, existing marine monument, and Asan villager existing memorial along the Asan Invasion Beach&quot; conflicts with the recently implemented Living Memorial Project. It further raises the issue of management following the Plan, although in draft stage. We are also concerned that the Living Memorial Project authorizes memorialization of virtually anyone upon a donation of $100 with no connection of the person memorialized to the Liberation of Guam or the War in the Pacific. Also, in view of severe budget constraints, we desire to know what funds have been committed to this Living Memorial Project.</td>
<td></td>
</tr>
<tr>
<td>62</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td></td>
<td>As indicated in this paragraph and elsewhere, there is too much emphasis toward local recreation use of a National Historical Park.</td>
<td></td>
</tr>
<tr>
<td>62</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td></td>
<td>We concur that the Asan memorial service should be continued as a traditional religious use of the Park. However, since no community fiestas or ceremonies presently take place at the old Naval Hospital Annex we see no need to introduce a new use for the Park.</td>
<td></td>
</tr>
<tr>
<td>62</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td></td>
<td>The facilities must be properly placed and landscaped so that they will not intrude upon the historic landscape of the Asan Beach.</td>
<td></td>
</tr>
<tr>
<td>64</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td></td>
<td>We feel there is no need to interpret this botanical area unless it has been determined to be outstanding.</td>
<td></td>
</tr>
<tr>
<td>64</td>
<td>7</td>
<td></td>
</tr>
<tr>
<td></td>
<td>We see no need to turn the current road to Mt. Tenjo into a trail since it will not receive any large vehicles, such as buses, use should be preserved in its present state as historical.</td>
<td></td>
</tr>
<tr>
<td>66</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td></td>
<td>The trailhead and trail at Mt. Alifan should be as high in elevation as possible in order to offer an overlook interpretation of the Agat invasion beach.</td>
<td></td>
</tr>
<tr>
<td>66</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td></td>
<td>The old pipeline should also be removed at Gaan Point.</td>
<td></td>
</tr>
<tr>
<td>69</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td></td>
<td>The hiring practice already begun should not be continued since it is clearly not in compliance with the law. The training programs should be explained. We feel that the stateside employees of the NPS have and will gain much knowledge from residents of Guam, the Northern Marianas and Micronesia.</td>
<td></td>
</tr>
<tr>
<td>69</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td></td>
<td>The drainage ditch is a definite intrusion upon the historic scene, that the Park should be preserving. Is there not an alternative that omits the channel?</td>
<td></td>
</tr>
</tbody>
</table>
Appendix A - 7

<table>
<thead>
<tr>
<th>Page</th>
<th>Paragraph</th>
<th>Text</th>
</tr>
</thead>
<tbody>
<tr>
<td>62</td>
<td>2</td>
<td>Comment unclear as to meaning. Text has been refined slightly for additional clarification.</td>
</tr>
<tr>
<td>62</td>
<td>3</td>
<td>No change here. Clarification has been provided under Resource Management concepts.</td>
</tr>
<tr>
<td>62</td>
<td>4</td>
<td>Traditional site already in park. GMP moves it to more usable site--not a new use.</td>
</tr>
<tr>
<td>62</td>
<td>5</td>
<td>We agree.</td>
</tr>
<tr>
<td>64</td>
<td>1</td>
<td>No change. Considered as an extra opportunity for varied use.</td>
</tr>
<tr>
<td>64</td>
<td>7</td>
<td>Agree in part. Text changed to clarify intent.</td>
</tr>
<tr>
<td>66</td>
<td>1</td>
<td>See Alternatives discussion in Assessment for Rationale on proposal.</td>
</tr>
<tr>
<td>66</td>
<td>6</td>
<td>Agree--that is the intent.</td>
</tr>
<tr>
<td>69</td>
<td>2</td>
<td>The park's hiring practices must conform to Office of Personnel Management laws. Within those laws, Public Law 95-348 authorizes and directs the NPS to hire local residents whenever possible.</td>
</tr>
<tr>
<td>69</td>
<td>4</td>
<td>Response provided previously.</td>
</tr>
<tr>
<td>Page</td>
<td>Paragraph</td>
<td>Text</td>
</tr>
<tr>
<td>------</td>
<td>-----------</td>
<td>------</td>
</tr>
<tr>
<td>70</td>
<td>1</td>
<td>The intent of the legislation was for a warship, not landing craft.</td>
</tr>
<tr>
<td>71</td>
<td>1-2</td>
<td>As previously stated, numerous significant sites are omitted.</td>
</tr>
<tr>
<td>84</td>
<td>Appendix B</td>
<td>To be fair to all professionals, consistency of credits should be given by name and title. Not simply Staff of Guam Department of Parks and Recreation. What about former employees who have contributed since they terminated that specific employment?</td>
</tr>
<tr>
<td>85-89</td>
<td>App. C</td>
<td>We see no need for an isolation cost factor for mobilization unless the NPS is intending to omit Guam contractors from bidding on the project. In addition, priorities should be given for construction.</td>
</tr>
<tr>
<td>87</td>
<td></td>
<td>For what purpose is a building at Bangi Point going to be rehabilitated? We see no need for a building at this point since it would be contrary to the principle of preserving the historic scene. We further believe that it would be unnecessary for maintenance purposes.</td>
</tr>
<tr>
<td>Page</td>
<td>Paragraph</td>
<td>Notes</td>
</tr>
<tr>
<td>------</td>
<td>-----------</td>
<td>-------</td>
</tr>
<tr>
<td>70</td>
<td>1</td>
<td>Comment inaccurate; legislation states &quot;naval vessel of World War II vintage.&quot;</td>
</tr>
<tr>
<td>71</td>
<td>1-2</td>
<td>Response provided previously.</td>
</tr>
<tr>
<td>84</td>
<td>Appendix B</td>
<td>Section added on Acknowledgments.</td>
</tr>
<tr>
<td>85-89</td>
<td>Appendix C</td>
<td>Response provided previously.</td>
</tr>
<tr>
<td>87</td>
<td></td>
<td>Document corrected. Item inadvertently left from early draft.</td>
</tr>
</tbody>
</table>
# APPENDIX B

**TECHNICAL CORRECTIONS WITH THE DRAFT ENVIRONMENTAL IMPACT STATEMENT**

<table>
<thead>
<tr>
<th>Page</th>
<th>Paragraph</th>
<th>Correction</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>4</td>
<td>The statement is made that the usual public involvement program was not used. We are concerned as to why this was not done and we request that it be done.</td>
</tr>
<tr>
<td>6</td>
<td></td>
<td>Include other military facilities (i.e. NAS, NAVCAMS, Naval Station, Naval Magazine) and Japanese tunnels in Agana.</td>
</tr>
<tr>
<td>9</td>
<td>2</td>
<td>Should start &quot;most remain for 1-3 days, 1/3 for 4 days and 1/4 for 5-9 days.&quot;</td>
</tr>
<tr>
<td>10</td>
<td>4</td>
<td>Considerable assistance was also done by the Government of Guam Department of Parks and Recreation.</td>
</tr>
<tr>
<td>11</td>
<td>3</td>
<td>The ruins of a historic house also exists at Adelup Point.</td>
</tr>
<tr>
<td>13</td>
<td>1</td>
<td>Asan Village was relocated at the end of the War.</td>
</tr>
<tr>
<td>14</td>
<td>4</td>
<td>There is a reported World War II airplane on Mt. Tenjo. No American guns were placed nor involved in World War I.</td>
</tr>
<tr>
<td>16</td>
<td>4</td>
<td>&quot;Sewage field&quot; is probably sewage outfall.</td>
</tr>
<tr>
<td>17</td>
<td>2</td>
<td>Include Japanese fortification of Rizal beach.</td>
</tr>
<tr>
<td>18</td>
<td>4</td>
<td>Agat Village was also relocated.</td>
</tr>
<tr>
<td>19</td>
<td>2</td>
<td>We do not believe that the execution site has been developed or used as a memorial.</td>
</tr>
<tr>
<td>22</td>
<td></td>
<td>Numerous equally important World War II Guam historic sites are not listed and should be.</td>
</tr>
<tr>
<td>24-25</td>
<td></td>
<td>The listing of the official rare and threatened species should be updated. Certain species are omitted such as the Guam deer and monitor lizard.</td>
</tr>
<tr>
<td>28</td>
<td>1</td>
<td>Hunting occurs in the Mt. Alifan Unit.</td>
</tr>
<tr>
<td>29</td>
<td>2</td>
<td>Legislation should be viewed for what it is, a legal requirement, not just an influence on management. Further, this document should quote the appropriate sections of the law to avoid any possible change in meaning.</td>
</tr>
<tr>
<td>29</td>
<td>2</td>
<td>The discussion of the National Register of Historic Places is confusing. We note no current listing of the War in the Pacific National Historical Park on the National Register. This should be clarified.</td>
</tr>
<tr>
<td>Page</td>
<td>Paragraph</td>
<td>Response</td>
</tr>
<tr>
<td>------</td>
<td>-----------</td>
<td>----------</td>
</tr>
<tr>
<td>1</td>
<td>4</td>
<td>Response provided previously.</td>
</tr>
<tr>
<td>6</td>
<td></td>
<td>Maps being revised and updated to be appropriate to needs of GMP.</td>
</tr>
<tr>
<td>9</td>
<td>2</td>
<td>Text clarified and updated.</td>
</tr>
<tr>
<td>10</td>
<td>4</td>
<td>Text revised.</td>
</tr>
<tr>
<td>11</td>
<td>3</td>
<td>Material noted for historians' use.</td>
</tr>
<tr>
<td>13</td>
<td>1</td>
<td>Clarification made in GMP.</td>
</tr>
<tr>
<td>14</td>
<td>4</td>
<td>Material noted for historians' use.</td>
</tr>
<tr>
<td>16</td>
<td>4</td>
<td>Text corrected</td>
</tr>
<tr>
<td>17</td>
<td>2</td>
<td>Material provided for historians.</td>
</tr>
<tr>
<td>18</td>
<td>4</td>
<td>Text corrected.</td>
</tr>
<tr>
<td>19</td>
<td>2</td>
<td>Data being checked.</td>
</tr>
<tr>
<td>22</td>
<td></td>
<td>Text clarified to indicate other site potential.</td>
</tr>
<tr>
<td>24-25</td>
<td></td>
<td>Material checked. No change necessary.</td>
</tr>
<tr>
<td>28</td>
<td>1</td>
<td>No change necessary.</td>
</tr>
<tr>
<td>29</td>
<td></td>
<td>Agree on use of legislation. Entire language included in GMP.</td>
</tr>
<tr>
<td>29</td>
<td>2</td>
<td>Information checked. Is correct as stated in text.</td>
</tr>
<tr>
<td>Page</td>
<td>Paragraph</td>
<td>Text</td>
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<tr>
<td>------</td>
<td>-----------</td>
<td>------</td>
</tr>
<tr>
<td>31</td>
<td>3</td>
<td>The listing of special conditions should be updated with the items given in Appendix A.</td>
</tr>
<tr>
<td>32</td>
<td>7</td>
<td>Delete the paragraph since the recreation stated is not unique to Guam as stated here.</td>
</tr>
<tr>
<td>33</td>
<td></td>
<td>A proposal should be included to restore the historic scene.</td>
</tr>
<tr>
<td>39</td>
<td>3</td>
<td>The Piti Guns should be studies with restoration as an alternative.</td>
</tr>
<tr>
<td>39</td>
<td>5</td>
<td>Save the existing swimming hole.</td>
</tr>
<tr>
<td>40</td>
<td>2</td>
<td>An additional section should be included to preserve the wetland habitat at Apaca Point.</td>
</tr>
<tr>
<td>48</td>
<td>1</td>
<td>The existing abandoned above ground sewer line should be removed. However, the mole upon which it rests should be used as a trail for visitors to use in order to gain a view of the shoreline as the Marines saw it as they came in during the invasion.</td>
</tr>
<tr>
<td>48</td>
<td>2</td>
<td>Several of the proposed developments such as the Asan Point Major Interpretive Facility, World War II Equipment Display, and Memorial to Ward Dead; Matgue River Park Administration and Maintenance; and Mt. Alifan Trailhead should be considered to have an adverse effect on the National Register properties and should be treated legally as such.</td>
</tr>
<tr>
<td>51</td>
<td>3</td>
<td>Additional information on plant revegetation should be obtained from the Department of Agriculture and the University of Guam.</td>
</tr>
<tr>
<td>52</td>
<td>1</td>
<td>How will the reef be restored to its natural state?</td>
</tr>
<tr>
<td>52</td>
<td>3</td>
<td>Improper management or development of the Mt. Tenjo/Mr. Chachao Unit could cause severe erosion with resultant deterioration of the downstream water quality.</td>
</tr>
<tr>
<td>53</td>
<td>4</td>
<td>This statement of positive cultural or social impact from preservation needs demonstrated linkages as to the reasons the impacts are positive.</td>
</tr>
<tr>
<td>53</td>
<td>7</td>
<td>This paragraph needs expansion and justifications for the conclusions. The park could have severe negative social impacts simply from relocation of families.</td>
</tr>
<tr>
<td>54</td>
<td>4</td>
<td>The impact upon tourism should be more specific. Contact with the tourist industry could give information as to how group tours will visit the Park, time allowed, and desired interpretive programs. Then, a qualified impact upon the tourism economy can be given.</td>
</tr>
<tr>
<td>Page</td>
<td>Paragraph</td>
<td>Description</td>
</tr>
<tr>
<td>------</td>
<td>-----------</td>
<td>-------------</td>
</tr>
<tr>
<td>31</td>
<td>3</td>
<td>Text corrected where appropriate.</td>
</tr>
<tr>
<td>32</td>
<td>7</td>
<td>No change. Considered an important item.</td>
</tr>
<tr>
<td>33</td>
<td></td>
<td>Text clarified.</td>
</tr>
<tr>
<td>39</td>
<td>3</td>
<td>Refer to NPS Policy on &quot;Historic Preservation.&quot;</td>
</tr>
<tr>
<td>39</td>
<td>5</td>
<td>No effect on shallow area adjacent.</td>
</tr>
<tr>
<td>40</td>
<td>2</td>
<td>Text updated here and in GMP.</td>
</tr>
<tr>
<td>48</td>
<td>1</td>
<td>Intent of GMP to restore historic shoreline to remain as stated. Some clarification made in document.</td>
</tr>
<tr>
<td>48</td>
<td>2</td>
<td>Section added to document on this subject.</td>
</tr>
<tr>
<td>51</td>
<td>3</td>
<td>Section added to text.</td>
</tr>
<tr>
<td>52</td>
<td>1</td>
<td>Text clarified.</td>
</tr>
<tr>
<td>52</td>
<td>3</td>
<td>Agree. No change necessary in text.</td>
</tr>
<tr>
<td>53</td>
<td>4</td>
<td>Text considered adequate. No change made.</td>
</tr>
<tr>
<td>53</td>
<td>7</td>
<td>Comment unclear. Text clarified and impacts emphasized.</td>
</tr>
<tr>
<td>54</td>
<td>4</td>
<td>Some additions made to text.</td>
</tr>
</tbody>
</table>
Other impacts should be objective and quantified such as the impact of construction, loss of real estate tax, and wages impact upon others. Real estate tax is comparatively low and thus not a major factor.

Property tax is comparatively low.

We believe that the historic preservation process legally required should be a component of this document, not just referencing the procedures.

By the definition given within this paragraph, the Asan memorial religious service qualifies under this law.

Fiestas are a celebration of a village's patron saint.

After consultation with the Government of Guam Department of Agriculture, this section should be rewritten.

This Plan should be reviewed under the Federal consistency requirements of CZM prior to a determination of no conflicts.

We recommend the addition to the Mt. Alifan Unit of the area east of the unit's boundary up to and including the summit of Mt. Alifan. At present, the unit's designation is improper as it does not include Mt. Alifan itself. Rationale for including this addition is given in Appendix A.

Many items not listed in this appendix are covered in Appendix A, but are definitely applicable to this appendix.
<table>
<thead>
<tr>
<th>Page</th>
<th>Paragraph</th>
<th>Content</th>
</tr>
</thead>
<tbody>
<tr>
<td>54</td>
<td></td>
<td>Some additional detail added to text.</td>
</tr>
<tr>
<td>55</td>
<td>1</td>
<td>No change needed.</td>
</tr>
<tr>
<td>56</td>
<td>2</td>
<td>Necessary documents will be part of final reports.</td>
</tr>
<tr>
<td>56</td>
<td>3</td>
<td>Agree. Plan provides for this.</td>
</tr>
<tr>
<td>56</td>
<td>4</td>
<td>Text corrected.</td>
</tr>
<tr>
<td>56</td>
<td>5</td>
<td>Text updated where needed.</td>
</tr>
<tr>
<td>57</td>
<td>3</td>
<td>Review and consistency requirements met.</td>
</tr>
<tr>
<td>61</td>
<td>3</td>
<td>Response provided previously.</td>
</tr>
</tbody>
</table>
APPENDIX K

LETTER FROM MARIANAS RECREATION AND PARK SOCIETY

RECOMMENDATIONS

The Committee members of the Marianas Recreation and Parks Society reviewing the War in the Pacific National Historical Park's General Management Plan, Draft Environmental Assessment, and Addendum recommend that:

1. Every point in our Committee's review should be considered carefully.

2. That legal requirements be adhered to in completing the Plan and future park management decisions.

3. That required studies such as the underwater survey be completed and incorporated into the Plan.

4. That in view of the great task of completing the Plan, implementing it, and coordinating that effort with the seashore study, site planning, planning for the American Memorial Park on Saipan, investigating the obtaining of a naval vessel(s) for exhibit purposes, and research the present management staff should be increased and future hiring should follow the legal requirements.

5. The Plan, Assessment, and Addendum should be reviewed by a resident committee before finalization of the documents.

6. The Plan be followed in future Park management.
Mr. James E. Miculka  
Acting Superintendent, War in the  
Pacific National Historical Park  
Post Office Box FA  
Agana, Guam  96910  

Dear Mr. Miculka:

I am responding to your letter of January 26, 1983, requesting a final version review of the General Management Plan and Environmental Assessment for the War in the Pacific National Historical Park. I am pleased to view the completion of these planning documents as meaningful progress towards the Park's management, development, and interpretation of World War II in the Pacific and the war's effects on Guam. From this viewpoint, I have several observations.

First, while the broad scope of the Park is to truly represent the Pacific theater of World War II, nevertheless a significant theme should be the effects on the Pacific Islanders. This could properly be initially implemented by interpretation and marking of the Manengon Concentration Camp site. In addition, future similar efforts such as living history research will have the support and cooperation of this administration.

This relates to an additional element in the park regarding the identification and marking of other sites on Guam relevant to the Park. This should stress additional sites on Guam regarding the persistence of the Guamanian people and their faith in the United States. I would suggest that other sites be identified and marked including the shipwrecks in Apra Harbor and elsewhere around Guam, the airfields used during the war, and remains of fortifications found around the island. I would suggest that by working with the Department of Parks and Recreation, a complete listing of sites can be promptly compiled.

I am also interested in the future interpretive program of the park since through interpretation, the historic events and sites will be related to park visitors. Therefore, I look forward to reviewing the forthcoming Interpretive Prospectus that the National Park Service has indicated would be available for comment.

I am enclosing the comments of the respective agencies of the Government of Guam that have reviewed the plan and assessment for your use. I am thus looking forward to working closely with the Park since cooperation can be mutually beneficial. In this regard, my office is interested in the plans and timing of land acquisition and development.

Sincerely yours,

EDWARD D. REYES  
Acting Governor
Memorandum

To: The Governor

From: Director, Bureau of Planning

Subject: Review of General Management Plan and Environmental Assessment for War In the Pacific National Historical Park

On July 6, 1982, the Bureau of Planning submitted comments on the Draft General Management Plan for the War In The Pacific National Park. This, the most recent Plan and Environmental Assessment reflects only minor changes from the previous documents and the Bureau's comments are still relevant. Our concerns fall into three categories, as follows:

1) The scope of the Park, as outlined in these documents, would not seem to be that as mandated by P.L. 95-348. The Plans indicate a commemoration of the battle to retake Guam, not the "War In the Pacific." Further, there is no mention of interpreting the "Banzai" attack, which was both historically startling, and was used on Guam, as a military maneuver, for the first time in World War II.

The War In The Pacific was also unique in that it was primarily a Naval war. This aspect is not dealt with in the Plan. The inability to obtain naval vessels and World War II aircraft for park display, may bring into question the ability of this park to interpret the "Pacific War" in depth.

The main focus of the plan seems to be to avoid hurting the feelings of the Japanese tourists. In doing so, the Park will be belittling the sufferings and sacrifices of the Pacific Islanders, for whose lands and lives the war was fought.

2) Environmentally, the Bureau of Planning is satisfied with the plan. The Bureau of Planning has completed a federal consistency review of the GMP and Environmental Assessment and has approved the plan for consistency with the Guam Coastal Management Program, with the following stipulations, which were agreed to by the War-In-The-Pacific National Historical Park:

a) Reef recovery methods and vegetation removal methods must be approved by Guam Environmental Protection Agency; and

b) Park improvements will not be allowed to degrade the visual aesthetics along Marine Drive in Asan.
3) The plan indicates a general lack of knowledge and concern in regard to Chamorro history, culture and sensitivities.

a) Page 8, Paragraph 2 of the E.A. retains the sentence, "In 1970, Guam's citizens elected their first Governor and Territorial Legislature." To be accurate this should read, "In 1970 Guam's citizens, for the first time, were allowed to elect their Governor."

b) Page 32, Paragraph 8 would indicate that village fiestas are held on the beaches. Other functions may be held on the beaches, but not village fiestas. This same paragraph indicates that the annual memorial service at Asan is a fiesta. This is not true.

c) Page 10, Paragraph 5 of the GMP States, "Japanese language schools were started and Guamanians were taught to bow." In truth, Guamanians were taught to bow through beatings by fist, sticks and rifle butts, not in schools. The interpretation as stated in the GMP does poor service to the memory of those Guamanians that suffered greatly at the hands of the Japanese Occupation Forces, and may question the ability or willingness of the Park historians to accurately interpret the "War In The Pacific."

I am available for any questions you may have in regard to this review.

/5/

PAUL B. SOUDER

MLHAM:epb

cc: Chrono

Subject
Memorandum

To: The Governor

From: Director of Commerce

Attn: Special Assistant for Federal Programs

Subject: General Management Plan for the War in the Pacific National Historical Park

The Department of Commerce has reviewed the Management Plan for the War in the Pacific National Historical Park and has no major objections to the overall outline and development scheme of the Park. There is, however, one area that we feel should also be addressed in the Plan. That is, the possible future impact of the Park's boundaries, which encompass a large area of water, on commercial fishing and other related water activities. In the section on "Potential Recreation Use," the statement appears vague relating to the use of the waters within the Park's boundaries (Asan and Agat location) for fishing and other water sport activities. This should be more clearly stated permitting these kinds of activities. We are particularly concerned about this because of the magnitude of development options being projected for the south.

Thank you for the opportunity to submit these comments.

PAUL CALLAGHAN
Acting
Mr. John Adams  
Western Regional Office  
National Park Service  
450 Golden Gate Avenue  
Box 36063  
San Francisco, CA 94102

Dear Mr. Adams:

After reviewing the draft General Management Plan for The War In The Pacific National Historical Park and consultation with the Park's Acting Superintendent and a representative of the National Park Service, the Bureau of Planning finds the Plan consistent with the Guam Coastal Management Program with the following stipulations:

1. Reef restoration and vegetation removal must be coordinated with the Guam EPA in order to ensure proper mitigation of adverse environmental impact; and

2. The Park management ensure that visual aesthetics along Marine Drive at Asan Point be protected or not degraded.

These stipulations have been agreed upon by all parties as being in the best interest of both Guam and the National Historical Park.

Completion of this review was delayed due to the death of the Park Superintendent in December, 1982.

The Acting Superintendent of the Park and the Office of Coastal Zone Management have, as of this date, been notified of our findings of consistency. If you have any questions in regard to this review or the agreed-upon stipulations, please do not hesitate to contact me.

Sincerely,

Paul B. Souder  
Director, Bureau of Planning
Memorandum

To: Special Assistant, Federal Programs

From: Director, Bureau of Budget and Management Research

Subject: Comments on the War in the Pacific Memorial Park Plan

In a meeting held at the Governor's office February 17, 1983, various concerns were addressed by government representatives on the War in the Pacific Memorial Park management plan. Since each representative is expected to transmit their official comments on the plan, the Bureau will address the concerns raised by its representative.

It is noted in the plan that much of the discussion about how the battle of Guam was fought centered mostly around the United States version of the battle. However, discussion of the extreme sacrifices and efforts by local resistance movements are not adequately addressed in the plan. For many of those people who in some way or another contributed to the resistance movement, the memorial will be a way that their actions could be recognized. For some, the park's reality has come too late as they have long since died. However, it behooves those involved in memorializing this tragic period to ensure that the sacrifices of all those who had contributed to the success of the invasion are recognized. The park being situated on Guam will be meaningless to those brave and gallant individuals whose efforts were not properly recognized. It is felt that the plan's general concepts is with considerable merit. The Park services should also be commended for providing the opportunity to critique the present plan as well as subsequent plans regarding this park. Such cooperative activities serve to further an understanding of territorial goals.

BERTHA L. DUENAS
Acting
February 23, 1983

The Hon. Ricardo J. Bordallo
Governor of Guam
Government of Guam
Agana, GU 96910

Dear Governor Bordallo:

I am writing in response to your memorandum dated February 1, 1983, requesting comments on the General Management Plan for the War in the Pacific National Historical Park.

After carefully reviewing the Plan, I would like to offer our support in favor of its implementation as soon as is feasibly possible. The authors of this Plan exhibit genuine concern in their objectives to provide a sensitive, accurate and unbiased interpretation of the Pacific Theatre of WWII for both our local people and our Japanese neighbors.

On a more practical footing, the Park will generate employment and training opportunities for our people in the relatively new fields, to Guam, of Federal Park Management. In line with our own tourism-related interests, the Park will add a very significant historical attraction for our visitors to Guam while at the same time conserving the natural attributes and scenic value of the areas to be included in the Park's system.

The only area of concern within the Plan that I feel should be addressed is the future boundary changes that are being proposed. Our only comment is that any acquisition of additional land for the Park go through the Public Hearing process to insure that any and all considerations that our local people may have will be addressed.

Again, Guam Visitors Bureau fully support the Plan as it exists in its current form and look forward to working with those persons who will be administering the Park in the future.

Sincerely,

GORDON W. TYDINGCO
General Manager
INTER-AGENCY MEMORANDUM

TO : The Governor
VIA : Special Assistant for Federal Programs
FROM : Administrator
SUBJECT : War in the Pacific National Historical Park General Management Plan and Environmental Assessment.

The Guam Environmental Protection Agency has reviewed the pre-final draft of the General Management Plan and Environmental Assessment for the War in the Pacific National Historical Park. All of our comments on the previous draft have been incorporated, and we have no further comments.

Thank you for the opportunity to review the documents once again.

HERMAN D. SABLAN
February 9, 1983

Memorandum

To: The Governor

From: Director of Land Management

Subject: General Management Plan for the War in the Pacific National Park

We have reviewed the final version of the General Management Plan and the environmental Assessment for the War in the Pacific National Historical Park without any comment. The plan adequately addresses the various historical sites on Guam relating to World War II, and the general concepts of their management and uses.

Best regards,

ANTONIO R. CHARFAROS
February 17, 1983

Memorandum

To: The Governor
From: Director of Agriculture

Subject: War in the Pacific National Historical Park

The Department of Agriculture has reviewed the General Management Plan and Environmental Assessment for the War in the Pacific National Historical Park. While we are in agreement with the concept of the park and are supportive of its goals, we believe that the attached corrections should be made to the General Management Plan and Environmental Assessment.

Attachment
General Management Plan

P.22 Animal Life. Should mention that 2 species of sea turtle, the Green and Hawksbill, are found in area and are protected under both local and federal Endangered Species Acts.

Also, the Guam Gallinule, listed as endangered under local law and proposed for federal listing, is found on Fena Lake and other wetland areas in southern Guam. See attached Guam Endangered Species List.

P.41 Vegetation. Should mention the 3 species of native plants on Guam Endangered Species List (protected under local Endangered Species Act, copy attached).

P.41 Animal Life. Reference to Endangered Species is not up-to-date. Should mention Guam's local Endangered Species List and point out that these 18 species (12 birds, 3 mammals, 3 plants) have been recommended for federal protection.

P.42/43 Marine Biology. No mention of presence in area of sea turtles (Green & Hawksbill), both of which are on Endangered Species List.

Environmental Assessment

P.24 Vegetation. See above comments regarding updating of this section to include the existing Guam Endangered Species List and plants thereon.

P.25 Animal Life. See above comments regarding Guam Endangered Species List.

P.25/26 Marine Biology. See above comments regarding sea turtles.

P.54 Marine Resources. The reef egret is not "potentially endangered". See above comments regarding Guam Endangered Species List. Also, should mention sea turtles as stated above.

P.59 C. Endangered Species Act. This section should be clarified to reflect existence of Guam Endangered Species Act and List and official proposals to place 18 species of plant and animal on Federal Endangered Species List.
Endangered Species Regulation No.1

Endangered Species List

Pursuant to the authority vested in the Director of Agriculture by Section 12325.4 of P.L. 15-36, "The Endangered Species Act of Guam", the following list of endangered species is hereby approved:

Guam Endangered Species List

<table>
<thead>
<tr>
<th>Chamorro Name</th>
<th>Common Name</th>
<th>Scientific Name</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Koko</td>
<td>Guam Rail</td>
<td>Rallus owstoni</td>
<td>Endangered</td>
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<tr>
<td>Pulattat</td>
<td>Marianas Gallinule</td>
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<td>Endangered</td>
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<td>Sihek</td>
<td>Micronesian Kingfisher</td>
<td>Halcyon c. cinnamomina</td>
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<td>Aga</td>
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<td>Guam Broadbill</td>
<td>Nigra freycineti</td>
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<td>Chichirika</td>
<td>Rufous-fronted Fantail</td>
<td>Rhipidura rufifrons uraniae</td>
<td>Endangered</td>
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<td>Sali</td>
<td>Micronesian Starling</td>
<td>Aplonis opaca guami</td>
<td>Threatened</td>
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<tr>
<td>Egigi</td>
<td>Cardinal Honeyeater</td>
<td>Myzomela cardinals saffordi</td>
<td>Endangered</td>
</tr>
<tr>
<td>Nossa</td>
<td>Bridled White-Eye</td>
<td>Zosterops c. conspicillata</td>
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Mammals

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<td>Payesyes</td>
<td>Sheath-tailed Bat</td>
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Plants

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<th>Common Name</th>
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<tr>
<td>Ufa-halomtano</td>
<td>Heritiera longipetiolata</td>
<td>Endangered</td>
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</tbody>
</table>
Memorandum

To: The Governor

From: Director, Department of Parks and Recreation

Subject: General Management Plan for the War in the Pacific National Historical Park

This memorandum is in response to your request regarding any assessment or evaluation of the final draft of the General Management Plan and Environmental Assessment for the War in the Pacific National Historical Park.

Before commencing with our comments it is essential to realize that the Department of Parks and Recreation has been involved with the National Park Service Office on Guam since 1978. Under the Historic Preservation Office, our staff have worked and cooperated with the National Park Service staff on Guam and also visiting officials from their offices in San Francisco and Washington. The communication between both offices have been cordial and effective. In addition to the working relationship that has been established, the State Historic Preservation Officer for the Territory of Guam also occupies the position of the directorship of the Department of Parks and Recreation. The official capacity of the SHPO is to insure the preservation of historical sites and provide whatever measures necessary to execute this responsibility. This cooperative and mutual effort between the Guam Historic Preservation Office and the Guam National Park Service will definitely develop a National Park on Guam to reflect the events associated to World War II as interpreted by the Americans, Japanese and most importantly the people of the Pacific.

After careful review of the final version, we do not have that many comments or objections. Again, the explanation for this is related to our past working relationship. We have continually submitted comments and recommendations to the Guam National Park Service. We are no more less an integral part of the development of the War in the Pacific National Historical Park today than we were yesterday.
The final draft certainly incorporated the comments that we submitted last year in October. The only comments that we can state for the present are: (1) It is recommended that the Guam Historic Preservation Office and the Guam National Park Service Office work closer together to enable the continual and beneficial participation of the GHPO. (2) It is highly recommended that other war sites, especially localities which played a major role in the history of the Chamorro people relating to their war experiences be included in the interpretation of the War in the Pacific National Historical Park. To illustrate the significance of this recommendation, the present day Chamorro population, especially those who lived through the war, have expressed concerns over the deletion of war sites such as the Manengun Concentration Camp or the Massacre Sites that involved their participation in the war. They also must be equally accounted for and must not be neglected in the interpretation of the World War II events. The Chamorro people, therefore, not only represent their war experiences, but that also of the other islanders of the Pacific.

A major development such as the War in the Pacific Historical Park will continually need the support and input of the citizens of Guam. Our history has been tied in with the many young American soldiers, who defended and died for our freedom thirty-seven years ago. We, the Chamorro people, have certainly learned from this experience, that sacrifice is a must to protect those inalienable rights that are inscribed in the constitution of the United States. For the generation that lived through the war, they fully are aware of the words of the late President John F. Kennedy. "Do not ask what your country can do for you, but what you can do for your country". Indeed, our Chamorro people who experienced the war events were asked to give more. Let us therefore of the present not remember or forsake their sacrifice. Let us also learn, that if we of the present do not remember the past, we are apt and condemn to commit the same event.

This is the significance of the War in the Pacific National Historical Park: to relate consequences of the unjust death of those who participated in this tragic event.

JOE E. PAULINO
APPENDIX C

Excerpt from Cultural Resources Management Guidelines NPS-28, December 81

STANDARDS FOR HISTORICAL NAUTICAL VESSELS

All preceding and general historic structure standards apply, plus the following additional standards are to be met:

CULTURAL RESOURCES MANAGEMENT
NPS-28 Standards

Each vessel needs a designation statement showing ownership and authority for expenditure of funds for operation and maintenance. The statement must show any associated legislative authorities. If a vessel has been acquired or operated without specific legislative authority, the statement must recount the planning process calling for acquisition of the vessel, including long-term program requirements and the director's specific authorization for its acquisition, operation, and maintenance.

Preservation and emergency treatment of the hull, superstructure, rigging, and fixed or movable machinery and of fixtures and equipment associated with the operation of the vessel will be carried out at properly equipped yards and docks.

A mooring plan that defines action for normal usage and storm conditions must be prepared. Moorage and docking facilities should be designed and located to prevent sudden damage or long-term deterioration of the vessel or historic berth structures through abrasion, electrolysis, impacts, strain, or storm forces.

Each vessel is to be inspected on a cycle sufficient to assure its floating integrity; each time a ship is in drydock, a marine board of survey report is to be made to document the vessel's current condition. An emergency plan shall be written, describing how to keep a vessel afloat or remove it from the water; it should include the preferred actions and describe the necessary equipment and personnel. Where park personnel and equipment are not adequate for carrying out the emergency actions, standard contracts to perform the emergency necessary work are to be in force.

All operating vessels are to have an annual US Coast Guard inspection; correction of any deficiencies must be made prior to further use.

Vessels removed from the water for permanent or temporary periods are to be blocked and secured in such a manner to prevent any long or short term damage to the fabric or the structure of the vessel.
# APPENDIX D

<table>
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<tr>
<th>NAME</th>
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<td>10/82</td>
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<td>Chamorro</td>
<td>Guam</td>
</tr>
</tbody>
</table>

**NOTE:** Staff includes one handicapped person.

*Presidential hiring freeze in effect at that time so local hire was not an option available to the park.

**Employment ended.
Mr. John Adams  
Western Regional Office  
National Park Service  
450 Golden Gate Avenue  
Box 36063  
San Francisco, CA 94102

Dear Mr. Adams:

After reviewing the draft General Management Plan for The War In The Pacific National Historical Park and consultation with the Park's Acting Superintendent and a representative of the National Park Service, the Bureau of Planning finds the Plan consistent with the Guam Coastal Management Program with the following stipulations:

1. Reef restoration and vegetation removal must be coordinated with the Guam EPA in order to ensure proper mitigation of adverse environmental impact; and

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These stipulations have been agreed upon by all parties as being in the best interest of both Guam and the National Historical Park.

Completion of this review was delayed due to the death of the Park Superintendent in December, 1982.

The Acting Superintendent of the Park and the Office of Coastal Zone Management have, as of this date, been notified of our findings of consistency. If you have any questions in regard to this review or the agreed-upon stipulations, please do not hesitate to contact me.

Sincerely,

[Signature]

PAUL B. SOUDER  
Director, Bureau of Planning
# APPENDIX F

## Endangered Plants, Birds, Mammal Species

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<tr>
<th>Chamorro Name</th>
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<td><strong>Plants</strong></td>
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<td>Egigi</td>
<td>Cardinal Honeyeater</td>
<td>Myzomela cardinalis saffordi</td>
<td>Endangered</td>
</tr>
<tr>
<td>Nossa</td>
<td>Bridled White-Eye</td>
<td>Zosterops c.conspicillata</td>
<td>Endangered</td>
</tr>
<tr>
<td><strong>Mammals</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fanihi</td>
<td>Marianas Fruit Bat</td>
<td>Pteropus m. mariannus</td>
<td>Endangered</td>
</tr>
<tr>
<td>Fanihi</td>
<td>Little Marianas Fruit Bat</td>
<td>Pteropus tokudae</td>
<td>Endangered</td>
</tr>
<tr>
<td>Payesyes</td>
<td>Sheath-tailed Bat</td>
<td>Embvallonura semicaudata</td>
<td>Endangered</td>
</tr>
</tbody>
</table>