DEPARTMENT OF THE AIR FORCE
AIR FORCE CENTER FOR ENGINEERING AND THE ENVIRONMENT
LACKLAND AIR FORCE BASE, TEXAS

11 Sep 12

MEMORANDUM FOR MELVIN FAISAO, HISTORIC PRESERVATION OFFICER
DEPARTMENT OF COMMUNITY AND CULTURAL AFFAIRS
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS
P.O. BOX 500090, SAIPAN, MP96950

FROM: AFCEE/CMP

SUBJECT: Consultation Initiation per Section 106 of the National Historic Preservation Act

1. In support of USAF/s effort to conduct a National Environmental Policy Act (NEPA) Environmental Impact Statement (EIS) titled *Divert Activities and Exercises, Guam and the Commonwealth of the Northern Mariana Islands*, the Air Force Center for Engineering and the Environment (AFCEE) respectfully submits the attached distribution list (Attachment 1), along with the *Request for Consultation Initiation and Findings of Effect to Historic Properties* (Attachment 2).

2. The attached request for consultation also includes two enclosures containing both the figures showing direct and indirect Areas of Potential Effects (APE) for each alternative, and the Section 106 (NHPA) findings and determinations for Divert Activities and Exercises EIS.

3. We appreciate your attention to this Divert Activities and Exercises consultation initiation request. If you have any questions, please contact Mr. William Grannis by email at william.grannis@us.af.mil or by telephone at (808) 449-4049.

DAVID A. KAWECK, Colonel
Chief, AFCEE Pacific RMO

2 Attachments:
1. Distribution List
2. Request for Consultation

cc:
HQ PACAF/A7P
AFCEE/TDX

ATTACHMENT 1

Distribution List for Consultation Initiation per Section 106, NHPA

Ms. Barbara Alberti, National Park Service

Mr. Lance Laughmiller, NAVFAC Marianas

Ms. Michelle Cruz, Federal Aviation Administration, Western Service Center

Ms. Katry Harris, Advisory Council on Historic Preservation

Ms. Elaine Jackson-Retondo, National Park Service, Pacific West Regional Office

Ms. Mertie Kani, CNMI Dept. of Community & Cultural Affairs, Div. of Historic Preservation

Ms. Carmen Sanchez, Tinian, CNMI Department of Community and Cultural Affairs

Ms. MaryAnn Lizama, Commonwealth Ports Authority

ATTACHMENT 2

Request for Consultation Initiation and Findings of Effect to Historic Properties
Prepared in accordance with Section 106, National Historic Preservation Act (NHPA) of 1966
U.S. Air Force (USAF), Pacific Air Forces (PACAF), Divert Activities and Exercises,
Francisco C. Ada/Saipan International Airport, Saipan; and Tinian International Airport, Tinian,
Commonwealth of the Northern Mariana Islands

1. INTRODUCTION

On 1 February 2012, the Pacific Air Forces (PACAF), Director, Installations and Mission Support provided a notification letter to your office(s) to advise you that the USAF is preparing an Environmental Impact Statement (EIS) for Divert Activities and Exercises (the Undertaking) and requesting data related to determining the Area of Potential Effect (APE), as well as discussing cultural resource survey strategies to catalog historic properties within the APE. Alternatives being evaluated under Section 106 of the NHPA of 1966, in conjunction with the EIS, include use of the existing FAA-regulated airports on Saipan (GSN) and Tinian (TNI) and fuel storage facilities at their respective ports. USAF's determinations of the APE, identification of Historic Properties within the APE, and Finding of Effects are summarized in the attached APE maps (Enclosure 1) and Section 106 Findings and Determinations (Enclosure 2). These determinations were developed in accordance with Section 106 of the NHPA and its implementing regulations posted in 36 Code of Federal Regulations, Part 800 (36 CFR 800). The PACAF project planning team for the NEPA action is now seeking additional advice and comment regarding its obligation to consult, determine effects, and resolve any adverse effects, per the requirements of the NHPA and regulations.

2. DESCRIPTION OF THE UNDERTAKING

On 29 February 2012, Mr. Grannis, HQ PACAF/A7AV, provided a Conceptual Project Plan that describes the undertaking via email to the Saipan Historic Preservation Office (HPO) and National Park Service, Superintendent, War in the Pacific NHP, Guam, American Memorial Park, Saipan. This Plan was subsequently provided via email to the Tinian HPO on March 06, 2012. Additional description of the Undertaking may be found in the Draft Environmental Impact Statement at http://www.pacafdivertmarianaseis.com/docs.html and in Enclosure 2. To summarize, the Undertaking is to determine the location to improve an existing airport or airports and associated infrastructure in support of expanding mission requirements in the western Pacific. Under this action, the USAF proposes to construct facilities and infrastructure at an existing airport or airports and necessary fueling facilities at a port to support a combination of cargo, fighter, and tanker aircraft and associated support personnel for periodic divert landings, joint military exercises, and humanitarian assistance and disaster relief efforts.

3. DESCRIPTION OF AREA OF POTENTIAL EFFECT (APE)

As defined in 36 CFR 800.16(d), the APE "…means the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking." Because the Undertaking involves multiple alternative project areas and phases,

USAF has defined eight APEs reflecting potential effects on the selected location, project phase, and potential direct, or indirect effects. These APEs are illustrated and described in Enclosures 1-2 and include:

a. Saipan Construction Phase Area of Potential Effect – Direct
b. Saipan Construction Phase Area of Potential Effect – Indirect
c. Saipan Implementation Phase Area of Potential Effect – Direct
d. Saipan Implementation Phase Area of Potential Effect – Indirect
e. Tinian Construction Phase Area of Potential Effect – Direct
f. Tinian Construction Phase Area of Potential Effect – Indirect
g. Tinian Implementation Phase Area of Potential Effect – Direct
h. Tinian Implementation Phase Area of Potential Effect – Indirect

4. IDENTIFICATION OF HISTORIC PROPERTIES IN THE AREA(S) OF POTENTIAL EFFECT (APE)

Historic properties include "…any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion on the National Register (16 U.S.C. Section 470(w)(5))." As described in greater detail in Enclosure 2, the following historic properties have been identified on Saipan and Tinian, within the APE, that may be affected by construction and/or implementation, whether direct or indirect:

a. Saipan Construction Phase Area of Potential Effect - Direct
- Aslito/Isley Field National Historic District portion of the Landing Beaches, Aslito/lsley Field, and Marpi Point National Historic Landmark (NHL)
- Newly recorded eligible structures, sites, and features at Aslito/Isley Field that date to the period of significance for the NHL and *may* contribute to its significance
- Newly recorded pre-contact isolated occurrences that do not contribute to the NHL
- Additional undiscovered or unanticipated eligible resources

b. Saipan Construction Phase Area of Potential Effect – Indirect
- All of the above **plus** the Japanese hospital and Campaneyan Kristo Rai in Garapan

c. Saipan Implementation Phase Area of Potential Effect - Direct
- All of the above

d. Saipan Implementation Phase Area of Potential Effect - Indirect
- All of the above **plus** Saipan Landing Beaches portion of the Landing Beaches, Aslito/Isley Field and Marpi Point NHL and the Tinian Landing Beaches, Ushi Point Field, and North Field NHL

e. Tinian Construction and Implementation Phase Areas of Potential Effect - Direct and Indirect
- US anti-aircraft artillery site near TNI
- House of Taga (San Jose)
- Nanyo Kohatsu Kabushiki Kaisha Ice Storage Building (San Jose)

- Additional undiscovered or unanticipated resources

5. DETERMINATION OF POTENTIAL EFFECT

As discussed in Enclosure 2, the Undertaking could have adverse direct and indirect effects to historic properties. The extent of adverse effects will be determined by the actual facilities constructed and the actual operations conducted at either location. Since Congressional authorization is required for each facility, and military operational and readiness concerns determine the type and extent of military training required at the location, the resultant actual effects could be fewer and less adverse than those discussed here and in Enclosure 2.

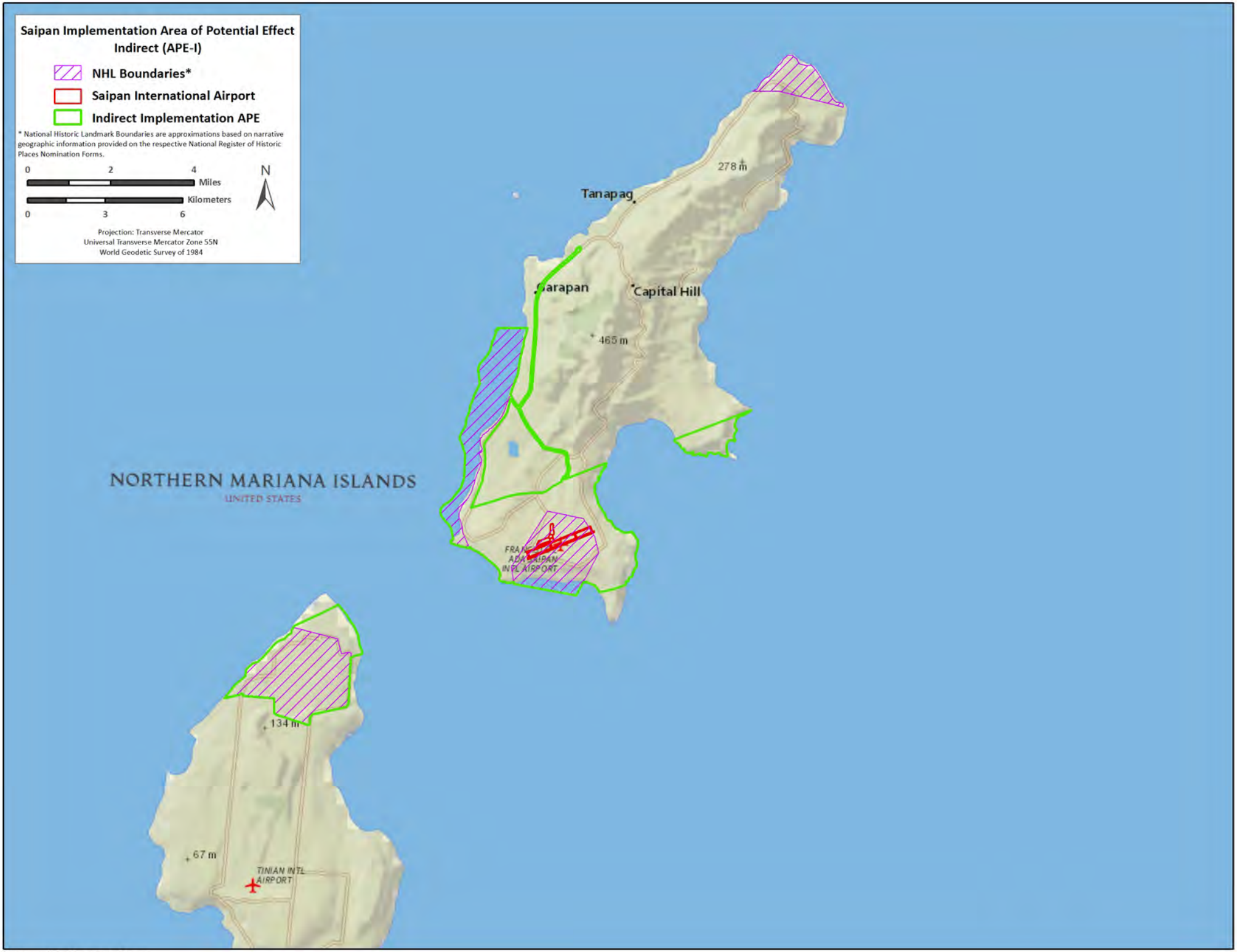
6. REQUEST FOR CONCURRENCE IN FINDINGS

We invite your comments on the definition of the APE, the adequacy of the efforts to identify historic properties potentially affected by the Undertaking, and the finding of effect. We are especially interested in identifying whether resources related to indigenous and/or traditional use or belief exist within the APE that qualify as traditional cultural properties (TCP) as outlined in 36 CFR 60.4. Based on our determination that the Undertaking may result in adverse effects to historic properties, we propose to resolve adverse effects to historic properties through development of an agreement, in consultation with your office and any other interested parties. Per 36 CFR 800.3(f), we are seeking to identify any other consulting parties. We welcome your recommendations on any parties to include in an invitation to consult on this project. Please indicate your concurrence with the above findings and proposal to develop an agreement within 30 days of receipt of this memo. If you have any questions or comments, or require any additional information, please contact Mr. William Grannis at (808) 449-4049, or by email at william.grannis@us.af.mil.

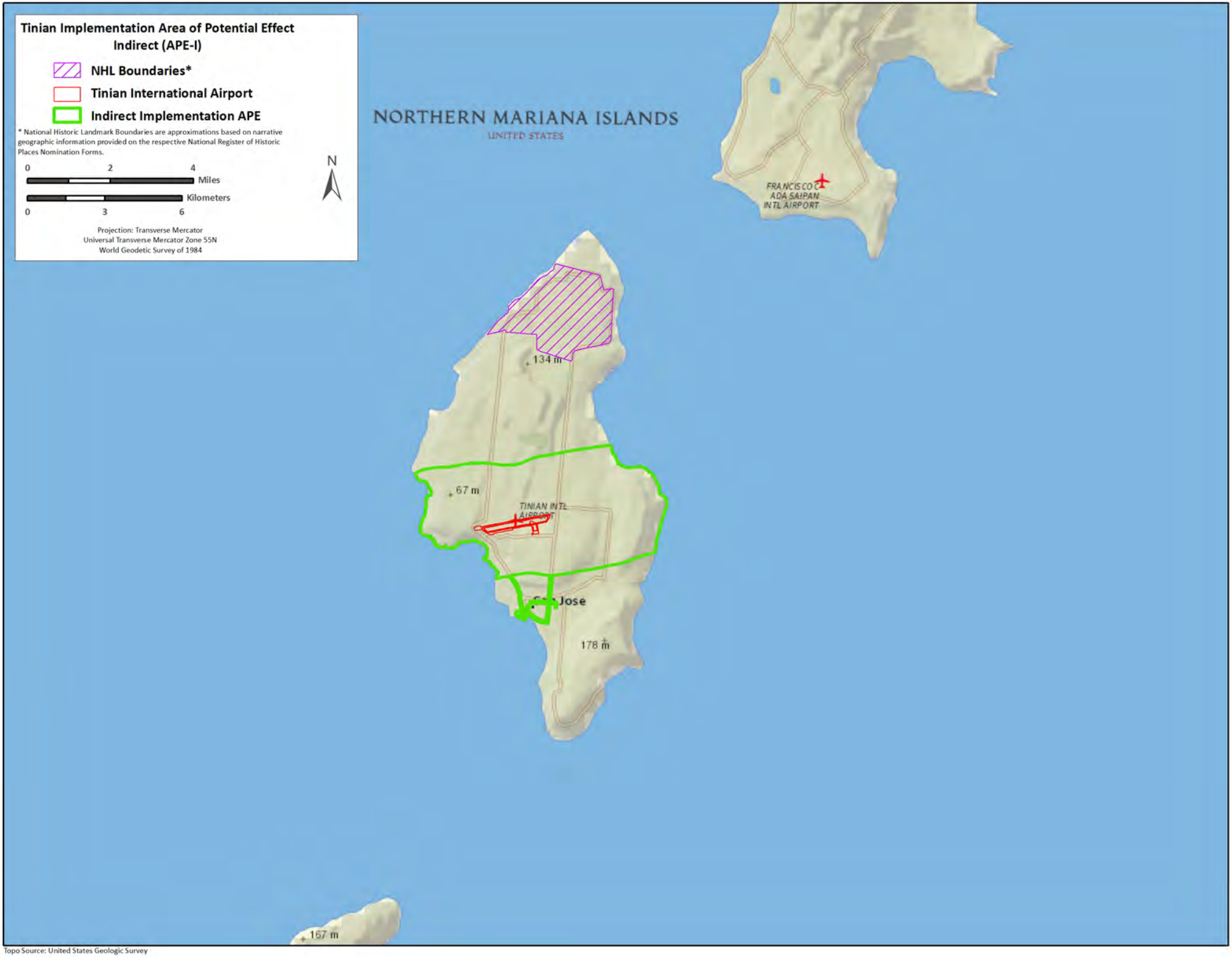
2 Enclosures:
1. Figures showing Direct and Indirect Areas of Potential Effects (APE) for Each Alternative
2. Section 106 (NHPA) Findings and Determinations for Divert Activities and Exercises

Enclosure 1: Figures showing Direct and Indirect Areas of Potential Effects (APE) for Each Alternative

Topo Source: United States Geologic Survey



Topo Source: United States Geologic Survey



Topo Source: United States Geologic Survey

1. Introduction

This document presents a detailed description of the Area of Potential Effect (APE), historic properties in the APE, and the effects to those resources from the proposed U.S. Air Force (USAF), Pacific Air Forces (PACAF), Divert Activities and Exercises (Divert). The Divert action would improve an existing airport or airports and associated infrastructure in support of expanding mission requirements in the western Pacific. Under the Divert action, the USAF proposes to construct facilities and infrastructure at an existing airport or airports and necessary fueling facilities at a port to support a combination of cargo, fighter, and tanker aircraft and associated support personnel for periodic divert landings, joint military exercises, and humanitarian assistance and disaster relief efforts. Two alternative project areas in the Commonwealth of the Northern Mariana Islands (CNMI) for the Divert action are under consideration. The project itself will involve two phases: construction and implementation. Pursuant to 36 CFR 800.4, this document details the Areas of Potential Effects (APE) for both the Saipan and Tinian locations during both phases of the project and identified historic properties within the APE. Having defined the APE an identified potentially affected historic properties, an analysis of the potential for adverse effects is presented pursuant to 36 CFR 800.5.

2. Determination of the Area of Potential Effects

As defined in 36 CFR 800.16 (d), the APE "…means the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking." Because the Divert action involves multiple alternative project areas and phases, PACAF has defined eight APE's reflecting potential effects on the selected location, project phase, and whether effects are expected to be direct or indirect and include:

1. Saipan Construction Phase Area of Potential Effect – Direct (APE-SC-D)
2. Saipan Construction Phase Area of Potential Effect – Indirect (APE-SC-I)
3. Saipan Implementation Phase Area of Potential Effect – Direct (APE-SI-D)
4. Saipan Implementation Phase Area of Potential Effect – Indirect (APE-SI-I)
5. Tinian Construction Phase Area of Potential Effect – Direct (APE-TC-D)
6. Tinian Construction Phase Area of Potential Effect – Indirect (APE-TC-I)
7. Tinian Implementation Phase Area of Potential Effect – Direct (APE-TC-D)
8. Tinian Implementation Phase Area of Potential Effect – Indirect (APE-TC-I)

These APE's are illustrated in the cover maps and are described below.

2.1 Saipan

The modern Francisco C. Ada/Saipan International Airport (GSN) is completely contained within the boundaries of the Isley Historic District portion of the Landing Beaches, Aslito/lsley Field, and Marpi Point National Historic Landmark (NHL). Because of this landmark status, the historic property merits special consideration under 36 CFR 800.10. This document considers that an effect on any *contiguous* part of the NHL, or National Historic Landmark District (NHLD), to be an effect to the entire NHLD, though not necessarily the entire NHL. For instance, in the current analysis, PACAF finds potential direct and indirect effects to the Aslito/Isley Field NHLD, potential indirect effects to the Saipan Landing Beaches, and no effect to Marpi Point.

2.1.1 Construction Phase – APE for Direct Effects

The APE for the Saipan alternative for the proposed Divert action includes a total construction footprint of approximately 2,748,947 square feet (63.1 acres). Nearly all of the proposed facilities and infrastructure would be constructed at GSN, with a small portion of the project to be built at the port of Saipan. The proposed construction is split into several discrete elements, which are detailed below (Figure 1).

[redacted]

Figure 1. Proposed Divert Construction, Saipan Alternative

Runway and Parking Apron

Three options are under consideration for modifications to the existing runway and parking apron. Under Option A, Runway 07 (the southern runway) would be extended by 1,375 feet. Of that total, a portion 725 feet long and 150 feet wide plus 50 feet of paved shoulders would be built on the west end of the runway. The remaining portion measuring 650 feet long and 150 feet wide plus 50 feet of paved shoulders would be built on the east end of the runway. Under Option B, the runway would be expanded only on the east end with the addition of an expansion measuring 650 feet long and 150 feet wide plus 50 feet of paved shoulder. Under Option C, the runway would not be expanded. The proposed action would also upgrade pavement markings, lighting, and navigational aids. The total footprint of the runway expansion, including turnarounds, under Option A would be approximately 388,952 square feet.

The proposed activity would also involve construction of new parking apron space. The project would build two separate parking aprons on the north side of the existing runway. The parking aprons would be constructed as two separate aprons instead of one area to avoid cultural resources, specifically, two Japanese air raid shelters. The total footprint of the proposed parking aprons would measure 963,744 square feet.

Temporary Munitions Storage Area

The proposed activity would also include the construction of a temporary munitions storage area approximately 1,750 feet south of the centerline of the runway at Saipan International Airport. The temporary munitions storage area would consist of an earth covered magazine (ECM) measuring approximately 3,264 square feet and an adjacent multi-cube magazine measuring 40,392 square feet, for a total footprint of approximately 43,656 square feet.

Hazardous Cargo and Arm/Disarm Pad

Construction of a hazardous cargo and arm/disarm pad would take place at the eastern portion of the taxiway and would measure approximately 194,534 square feet.

Aircraft Hangar

To store aircraft awaiting maintenance or repair, one aircraft hangar measuring approximately 180 by 195 feet would be constructed to the east of the eastern portion of the new parking ramp and apron. The hangar's total footprint would be approximately 35,100 square feet.

Maintenance Facility

The Divert action would also include construction of a new maintenance facility north of the new parking apron measuring approximately 6,000 square feet.

Fuel Receiving, Storage, and Distribution

To provide for jet fuel receiving, storage, and distribution needs, the Divert action would entail construction of a new aboveground storage tank at Saipan International Airport, as well as two aboveground storage tanks at the Port of Saipan next to the U.S. Army Reserve Center inland from the existing commercial fuel storage area. Between the airport and the port, the fuel system would occupy a total of approximately 582,653 square feet.

Because effects to specific properties that make up the entire Asltio/Isley Field NHLD are possible during the Construction Phase, the entire NHLD is included in the APE. It is important to note that there is a difference between the boundary presented for the Isley Field National Historic District in its nomination and the boundary for the Aslito/Isley Field portion of the NHL as presented in the landmark nomination. The landmark boundary cuts off some portions of the B-29 hardstand system that was included in the district boundary (Figure 2). Therefore, for the purposes of this consultation, PACAF considers the APE to include the maximum extent of the combined boundaries.

The construction of the two aboveground storage tanks at the Port of Saipan next to the U.S. Army Reserve Center is also included in the Construction Phase APE for Direct Effects.

2.1.2 Construction Phase – APE for Indirect Effects

In addition to these specific construction projects, the USAF plans to ship Divert-related construction material between the Port of Saipan and these locations at the airport using existing roads. However, a study conducted by the California Department of Transportation (Caltrans) in 2002 found that earthborn

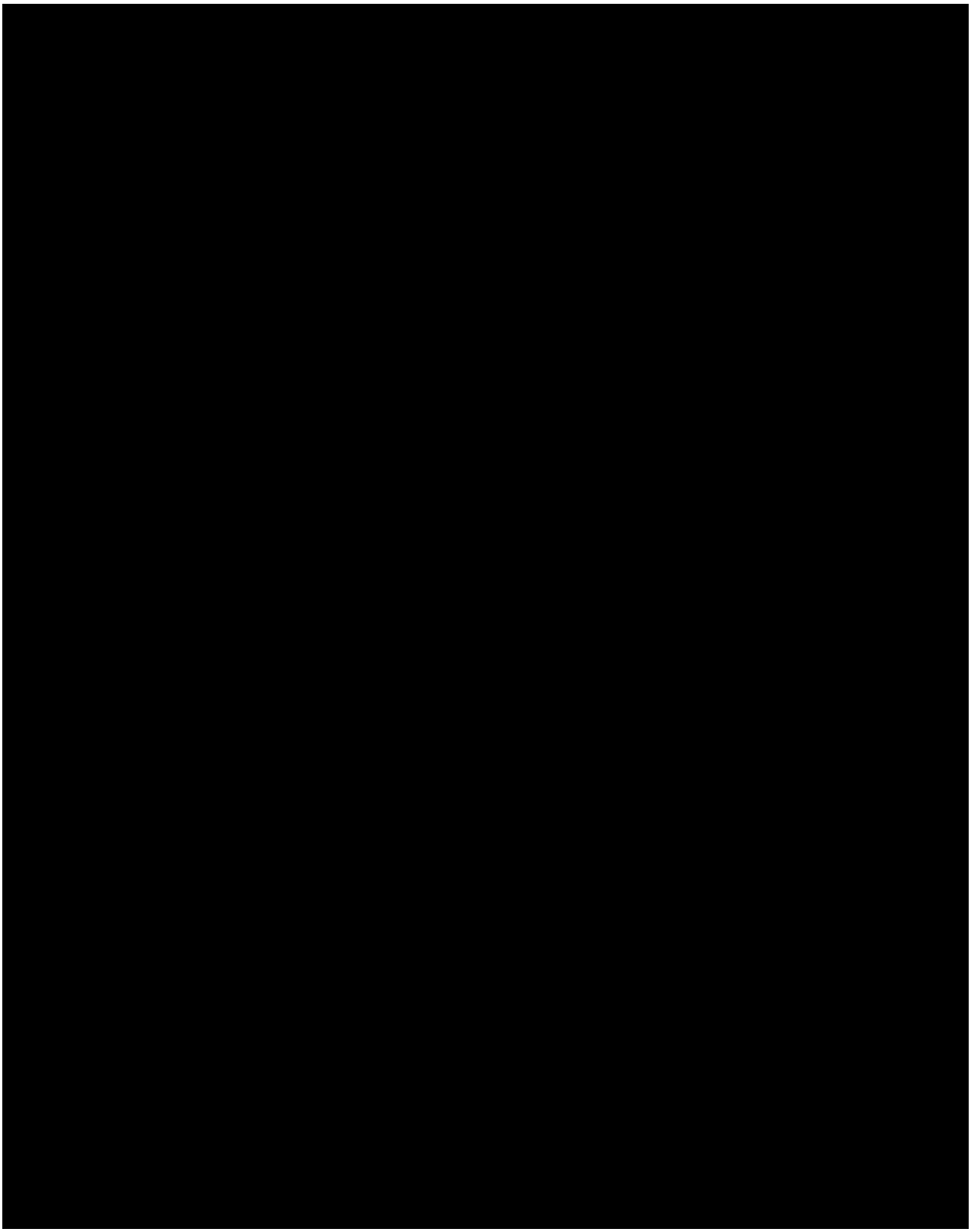


Figure 2. Aslito/Isley Field National Historic District portion of the Landing Beaches, Aslito/lsley Field, and Marpi Point NHLD.

vibration from transportation along existing paved roads has virtually no impact on historic buildings located more than 5 meters away and that, in fact, such vibrations drop below the perception threshold beyond 45 meters. The study was very conservative, considering heavy trucks as the vehicular source of vibration (similar to the construction trucks likely to be used during Divert construction) and assuming wood framed historic structures. As a result, Divert transportation routes during construction are only considered here for their potential to cause indirect adverse effects due to vibration within the 45-meter threshold of perception. Therefore, the Construction Phase APE for Indirect Effects includes the Aslito/Isley Field NHLD and the construction area for fuel tanks at the Port of Saipan plus a 45-meter buffer around the proposed routes for cement truck traffic during construction.

2.1.3 Implementation Phase – APE for Direct Effects

In addition to use of the new facilities built during the Construction Phase, temporary billeting of personnel will occur during Divert training exercises and missions. Normally this would involve the use of local commercial lodging. However, in some circumstances, a Basic Expeditionary Airfield Resources (BEAR) kit may be used. The BEAR kit would occupy approximately 12.3 acres (534,308 square feet) in a soccer field near the entrance to the airport. Infrastructure to the field would be improved to support the BEAR kit. Billeting for Divert-related personnel under the Saipan alternative would be temporary. Because this area is also within the boundaries of the Aslito/Isley Field NHLD, the Implementation APE for Direct Effects includes the Aslito/Isley Field NHLD and the construction area for fuel tanks at the Port of Saipan.

2.1.4 Implementation Phase – APE for Indirect Effects

Existing roads will also be used during implementation to ship fuel from the port to the airfield. However, as mentioned earlier, earthborn vibration from transportation along existing paved roads drops below perceptible levels at a distance 45 meters. As a result, Divert transportation routes during implementation are only considered here for their potential to cause indirect adverse effects due to vibration within the 45-meter threshold of perception.

The implementation phase of the Divert project could also have indirect adverse effects on historic properties in the form of increased aircraft noise. Under 36 CFR 800.5, effects include the introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features. On Saipan, increased aircraft noise would constitute an indirect adverse impact on the integrity of feeling of the Saipan Landing Beaches and Aslito/Isley Field portions of the Saipan Landing Beaches, Aslito/Isley Field, and Marpi Point NHL. Increased aircraft noise would also have an indirect adverse impact on the integrity of feeling of the Tinian Landing Beaches, Ushi Point Field, and North Field NHL on Tinian.

Therefore, the Implementation Phase APE for Indirect Effects includes all land areas under noise contour lines as they are currently drawn for the Divert exercises and missions. As mentioned above for the Aslito/Isley Field NHLD, where these effects contact historic districts, as with the Saipan Landing Beaches portion of the Landing Beaches, Aslito/lsley Field, and Marpi Point NHL and Tinian Landing Beaches, Ushi Point Field, and North Field NHL on Tinian, the entire district is included in the APE. The Implementation Phase APE for Indirect Effects on Saipan also includes a 45-meter buffer around the proposed routes for fuel trucks between GSN and the Port of Saipan during implementation as well as the port itself.

2.2 Tinian

2.2.1 Construction Phase – APE for Direct Effects

The APE for the Tinian alternative for the Divert action includes a total construction footprint of approximately 4,182,517 square feet (96.0 acres), all but approximately 41,300 square feet of which would be at the Tinian International Airport with the remainder at the port of Tinian (Figure 3). The proposed construction is split into several discrete elements, which are detailed below.

Figure 3. Proposed Divert construction, Tinian alternative.

Runway and Parking Apron

Two options are under consideration for expansion of the runway at Tinian International Airport. Under Option A, the runway would be extended to a total of 10,000 feet long by adding a segment 1,400 feet long by 150 feet wide plus 50 feet of paved shoulders, plus a 1,000 foot long Runway Safety Area. The extension would be to the eastern end of the runway, and Broadway Road would therefore be rerouted to the east of its current position. The total footprint of Option A would be approximately 539,748 square feet. Under Option B, the runway would not be extended.

To accommodate Divert aircraft, a parking apron at Tinian International Airport would be constructed to approximately 1,660,000 square feet.

Temporary Munitions Storage Area

The Tinian alternative would also include the construction of a temporary munitions storage area north of the airport consisting of an earth covered magazine (ECM) and an adjacent multi-cube magazine have a total footprint of approximately 37,062 square feet.

Hazardous Cargo and Arm/Disarm Pad

A combination hazardous cargo pad and arm/disarm pad would be built at the southeastern side of the runway have a total footprint of approximately 454,719 square feet.

Aircraft Hangar

The project would also involve the construction of an aircraft hangar south of the runway measuring approximately 180 by 195 feet, for a total footprint of approximately 35,100 square feet.

Maintenance Facility

A maintenance facility measuring approximately 6,000 square feet would be built adjacent to the proposed hanger and south of the proposed parking apron.

Fuel Receiving, Storage, and Distribution

As part of the Tinian alternative for the Divert project, jet fuel receiving, storage, and distribution facilities would be constructed at the airport and at the Port of Tinian. In total, between the airport and the port, the fuel system would occupy approximately 679,808 square feet. Approximately 41,300 square feet of that total would be at the port of Tinian.

The Construction Phase APE for Direct Effects includes these construction footprints at TNI and the Port of Tinian.

2.2.2 Construction Phase – APE for Indirect Effects

In addition to these specific construction projects, the USAF plans to ship Divert-related construction material between the Port of Tinian and construction locations at the airport using existing roads. Therefore, the Construction Phase APE for Indirect Effects includes the construction areas at TNI and the Port of Tinian plus a 45-meter buffer around the proposed routes for cement truck traffic during construction (see previous discussion).

2.2.3 Implementation Phase – APE for Direct Effects

In addition to use of the new facilities built during the Construction Phase, temporary billeting of personnel will occur during Divert training exercises and missions. Because of the limited supply of commercial lodging on Tinian, all personnel would be housed at a BEAR kit that would occupy approximately 17.8 acres (approximately 773,303 square feet) south of TNI. Infrastructure to the parcel would be improved to support the BEAR kit. The Implementation APE for Direct Effects therefore includes the proposed facilities at TNI and the Port of Tinian plus the BEAR kit site near the airport.

2.2.4 Implementation Phase – APE for Indirect Effects

Existing roads will be used during implementation to ship fuel from the port to the airfield. Further, under the high-noise scenario for Divert activities and exercises at TNI, noise levels would increase near the airport but not in San Jose. As a result, the Implementation Phase APE for Indirect Effects includes all land areas under noise contour lines as they are currently drawn for the Divert exercises and missions, a 45-meter buffer around the proposed routes for fuel trucks between TNI and the Port of Tinian during implementation, and the port itself.

3. Identification of Historic Properties

Having identified the APE, PACAF conducted a review of existing information regarding historic properties within the APE and has sought, or is seeking, additional information from consulting parties pursuant to 36 CFR 800.4 (a)(2)&(3). Although no Federally recognized Indian tribes or Native Hawaiian organizations exist in the CNMI pursuant to 36 CFR 800.4(a)(4), PACAF is also reaching out to Chamorro and Carolinian representatives. PACAF also contracted a cultural resources consulting firm, HDR, to perform a Phase I cultural resources survey and inventory of the proposed construction sites near GSN. The following tables and discussion are based on findings from these efforts and represent PACAF's good faith effort to identify historic properties within the APE pursuant to 36 CFR 800.4 (b).

3.1 Historic Properties within the APE for the Saipan Alternative

Table 1. Known Historic Properties, Saipan Alternative

HISTORIC PROPERTIES* – SAIPAN ALTERNATIVE	POTENTIAL EFFECTS			
	CONSTRUCTION		IMPLEMENTATION	
	Direct	Indirect	Direct	Indirect
Saipan Landing Beaches, Aslito/Isley Field, and Marpi Point NHL, including:	P	P	P	P
Marpi Point	N	N	N	N
Saipan Landing Beaches	N	N	N	Y
Aslito/Isley Field NHLD, including:	P	Y	Y	Y
Isley Field NRHP Historic District, including:	P	Y	Y	Y
Japanese Barracks Complex[1]	N	Y	N	Y
Japanese Military Hospital[1]	N	Y	N	Y
Japanese Engineers Barracks[1]	N	Y	N	Y
Japanese Barracks Complex[1]	N	Y	N	Y
Japanese Staff Quarters[1]	N	Y	N	Y
Japanese Pyrotechnics Bldg.[1]	N	Y	N	Y
Japanese Garage[1]	N	Y	N	Y
Japanese Sentry Post[1]	N	Y	N	Y
Japanese Road[1]	N	Y	N	Y
Japanese Dispensary[1]	N	Y	N	Y
Japanese Administration Building[1]	N	Y	N	Y
Japanese Power Plant[1]	N	Y	N	Y

HISTORIC PROPERTIES* – SAIPAN ALTERNATIVE	POTENTIAL EFFECTS			
	CONSTRUCTION		IMPLEMENTATION	
	Direct	Indirect	Direct	Indirect
Japanese Oxygen Generating Building[1]	N	Y	N	Y
Japanese Repair and Maintenance Area #1[1]	N	Y	N	Y
Japanese Repair and Maintenance Area #2[1]	N	Y	N	Y
Japanese Semi Underground Bomb Storage[1]	N	Y	N	Y
Japanese Airplane Hangers[1]	N	Y	N	Y
Japanese Air Operations Building[1]	N	Y	N	Y
Japanese Gasoline Storage Bunkers[1]	N	Y	N	Y
Japanese Power Plant Building[1]	N	Y	N	Y
Japanese Unidentified Structure[1]	N	Y	N	Y
Japanese Water Supply Facility[1]	N	Y	N	Y
Japanese Gasoline Bunker[1]	N	Y	N	Y
Japanese Radio Station[1]	N	Y	N	Y
Okinawan Housing Area[1]	N	Y	N	Y
Japanese Service Apron[1]	N	Y	N	Y
U.S. North Service Apron[1]	N	Y	N	Y
U.S. Maintenance and Repair Complex[1]	N	Y	N	Y
U.S. B-29 Hardstands[1]	P	Y	P	Y
Japanese Air Raid Bunkers (11)[2]	N	Y	P	Y
Runways (2)[2]	N	Y	P	Y
Isley Field NRHP Historic District, newly recorded features,[3] recommended **contributing**:	N	Y	N	Y
Concrete foundations with drain (2)	N	Y	N	Y
Japanese bunker	N	Y	N	Y
Water catchment features (2)	N	Y	N	Y
Bottle dump	N	Y	N	Y
Isley Field NRHP Historic District, newly recorded features,[3] recommended **non-contributing**:	P	Y	N	Y
Concrete water tower	Y	Y	N	Y
Concrete foundation with drain	Y	Y	N	Y
Concrete slab	N	Y	N	Y
Concrete foundation	N	Y	N	Y
Concrete pad	Y	Y	N	Y
Latte phase isolated occurrences (3)	N	Y	N	Y
Japanese Hospital, Garapan	N	N	N	N
Camaneyan Kristo Rai (bell tower), Garapan	N	N	N	N
Japanese 20mm Cannon Blockhouse, Agingan	N	N	N	Y
Tinian Landing Beaches, Ushi Point Field, and North Field NHL	N	N	N	Y

*This list is based on current knowledge about the APE; it is possible that unrecorded or undiscovered historic properties, especially buried archaeological sites, exist in the area.

Properties listed in **Bold** are individually listed on the NRHP.

[1] These individual structures or features were identified by Denfeld and Russell (1984); some of them are combined on the NRHP nomination form.

HISTORIC PROPERTIES* – SAIPAN ALTERNATIVE	POTENTIAL EFFECTS			
	CONSTRUCTION		IMPLEMENTATION	
	Direct	Indirect	Direct	Indirect

[2] These features are noted in the NRHP nomination form but were not evaluated individually by Denfeld and Russell (1984).

[3] These structures, features, and sites were recorded during a Phase I cultural resources survey of proposed construction areas within the Aslito/Isley Field NHLD and at the Saipan port in support of the Divert undertaking (HDR 2012).

POTENTIAL EFFECTS: Y = The property could be adversely affected
N = The property will not be adversely affected
P = Part of the property could be adversely affected

Numerous historic properties exist in or near the APE for the Saipan alternative (Table 1). With the exception of the aboveground storage tanks at the Port of Saipan and existing roads, all proposed Divert-related construction and implementation activities would take place within the boundaries of the Aslito/Isley Field portion of the Landing Beaches, Aslito/lsley Field, and Marpi Point NHL. Aslito/Isley Field was nominated to the National Register in 1980 as the Isley Field Historic District but was later included in a NHL recommendation for three of Saipan's World War II-era sites. The separate World War II-related properties were listed as the Saipan Landing Beaches, Aslito/Isley Field, and Marpi Point National Landmark on February 4, 1985 (National Historic Landmark System [NHLS] No.: 85001789). Because the Saipan Landing Beaches, Aslito/Isley Field, and Marpi Point NHL includes three discontinuous areas, they are considered separately in this analysis. We use the term National Historic Landmark District (NHLD) to distinguish between the NHL as a whole, and the spatially separate landing beaches, Marpi Point, and Aslito/Isley Field.

When Aslito/Isley Field was nominated as a historic district, the nomination listed the following 27 buildings and structures as contributing elements:

The operations center built and used by the Japanese and later used for similar purposes by the U.S. 73rd Bombardment Wing,
Four gas drum storage bunkers,
A power plant,
A building to house an electric generator,
A semi-subterranean bomb storage facility,
A defensive gun emplacement atop the bomb storage facility,
A semi-subterranean fuel storage facility,
Three associated fuel tanks,
A pump house,
A torpedo regulating shop,
A cold storage building,
Eleven air raid shelters,
Two runways, and
"(H)undreds of hardstands and foundations from the U.S. period."

When Aslito/Isley Field was included in the Saipan Landing Beaches, Aslito/Isley Field, and Marpi Point National Landmark on February 4, 1985, the nomination form listed the following structures as contributing elements at the airfield: the air operations building, two power plants, four gasoline storage buildings, fourteen air raid shelters (an increase of three shelters from the district nomination), an aerial bomb magazine, a partly underground structure for gasoline storage tanks, and "various structural ruins."

The nomination also lists the two runways and notes that "the nearly seven miles of B-29 taxiways and over 100 out of 181 hardstands (parking areas) around the runways may be traced in part." The nomination also lists the site of the 73rd Bombardment Wing's administrative area south of the runways. Finally, it lists the Japanese blockhouse on the beach at Unai Opyan. The nomination specifically excludes the site of Kobler Field southwest of Isley Field, which by 1985 had been converted into a large housing development and had therefore "lost the greater part of its integrity."

The Saipan Landing Beaches, Aslito/Isley Field, and Marpi Point NHL nomination form does not have a map of the landmark's boundaries, a map of the elements contributing to the landmark, or a comprehensive itemized list of those contributing elements.

The HDR survey of construction areas conducted in support of the Divert action resulted in the identification of three pre-contact (Latte phase) isolated artifact occurrences and 11 historic features. The features include a Japanese bunker, several water catchment features, concrete foundations and pads, and a bottle dump. These features and materials probably date between 1935 and 1945. The three pre-contact occurrences are comprised of light scatters of Latte period sand-tempered sherds in disturbed soils and contexts.

Several properties that are individually listed on the NRHP are located near the APE including the bell tower (Campaneyan Kristo Rai) and Japanese hospital in Garapan and a Japanese 20mm Cannon Blockhouse in Agingan.

3.2 Historic Properties within the APE for the Tinian Alternative

The vast majority of proposed Divert-related construction and ongoing activity would take place at the TNI. Previous research has recorded a large number of historic resources near the airport. The site of the pre-war Gurguan Airfield has been identified immediately west of the modern airport and appears as a long, narrow rectangle. This site has been recommended as eligible for listing on the NRHP. All of West Field, the Japanese-era airstrip as modified by U.S. forces during the Second World War and the basis of the modern airport, has also been recorded as a historic resource and has been recommended as eligible for listing on the NRHP. Pavement, hardstands, and other features associated with West Field are still visible on aerial photographs. However, background research did not find a boundary for the West Field site, and it is therefore unclear the degree to which the modern airport preserves intact Second World War-era features. The site of the WWII-era U.S. Naval Air Base HQ has been identified at the east end of the modern runway. This site has also been recommended as eligible for listing on the NRHP.

Table 2. Known Historic Properties, Tinian Alternative

HISTORIC PROPERTIES* – TNI ALTERNATIVE	POTENTIAL EFFECTS			
	CONSTRUCTION		IMPLEMENTATION	
	Direct	Indirect	Direct	Indirect
House of Taga	N	P	N	P
NKK Administration Building, San Jose	N	N	N	N
Ice building, San Jose	N	N	N	P
Laboratory, San Jose	N	N	N	N
Japanese building (probable store), San Jose	N	N	N	P
Archaeological sites related to pre-WWII Japanese occupation near TNI (3)	N	N	N	Y

HISTORIC PROPERTIES* – TNI ALTERNATIVE	POTENTIAL EFFECTS			
	CONSTRUCTION		IMPLEMENTATION	
	Direct	Indirect	Direct	Indirect
Gurguan Airfield	N	N	N	Y
West Field	N	N	N	Y
US Naval Air Base HQ	N	N	N	Y
US anti-aircraft artillery sites (2)	N	N	N	Y
Leposarium I & Leposarium II Latte phase sites (TN-594)	N	N	N	Y

*This list is based on current knowledge about the APE; it is possible that unrecorded or undiscovered historic properties, especially buried archaeological sites, exist in the area.

1. Properties listed in **Bold** are individually listed on the NRHP.
2. All other properties listed here have been recommended eligible listing on the NRHP.

POTENTIAL EFFECTS: Y = The property could be adversely affected
N = The property will not be adversely affected
P = Part of the property could be adversely affected

4. Assessment of Adverse Effects

According to 36 CFR 800.5(a)(1), "…(a)n adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association." The following discussion outlines PACAF's application of the criteria of adverse effect to cultural resources identified on Saipan and Tinian during both the implementation and construction phases of the project.

4.1 Potential Adverse Effects to Cultural Resources – Saipan Alternative

Divert-related construction, the shipment of Divert-related construction material, and ongoing Divert operations under the Saipan alternative would have potential direct and indirect adverse effects on cultural resources on Saipan.

4.1.1 Potential Direct Construction Phase Effects to Cultural Resources

Divert-related construction at GSN has the potential to have direct adverse effects on the Asltio/Isley Field NHLD by altering the integrity of the property's location, design, setting, materials, workmanship, feeling, or association, per 36 CFR 800.5.

All of the Divert-related construction footprints at GSN, with the exception of the extensions to the runway, would be constructed in the general vicinity of the locations of B-29 hardstands built by U.S. forces during the Second World War. Construction could therefore potentially directly affect the integrity of WWII-era hardstands that represent a contributing element to the National Historic Landmark.

Note that the Phase I Cultural Resources survey conducted in support of the project did not observe intact hardstand pavement within the proposed construction footprints of individual elements of the Divert project. The report also observed that WWII-era pavements could be very deeply buried or could have been destroyed by vegetation growth, post-war land clearance, or other forces.

The Phase I survey also found that the construction footprints of the proposed Divert-related structures at GSN would not directly impact any of the standing historic structures (listed above) that constitute contributing elements to the NHLD.

The construction of Divert-related facilities would have no direct effects to the Landing Beaches portion of the NHL, which would see no modifications as part of the proposed Divert project. Divert-related construction would also have no adverse effects (direct or indirect) to the Marpi Point portion of the NHL, which is far to the north of all proposed actions.

Divert-related construction of aboveground fuel storage tanks at the Port of Saipan would have no direct adverse effects to cultural resources at the port. Although the area of the modern port was the site of Navy Seabee activity during the war, no evidence of this remains and the project construction footprint is well inland from where these activities are thought to have taken place. The port is not part of the NHL, nor is the construction footprint on or near an NRHP-listed or NRHP-eligible archaeological or historic resource.

During construction of Divert-related facilities, construction materials would be transported by truck along existing roads from the port to the airport. Construction traffic would pass close to (within .1 miles) the NRHP-listed Japanese hospital and Campaneyan Kristo Rai in Garapan.

4.1.2 Potential Indirect Construction Phase Effects to Cultural Resources

With the exception of the aboveground storage tanks at the port of Saipan, all proposed Divert-related construction would take place within the boundaries of the Aslito/Isley Field NHLD. Specifically, the construction of new Divert-related facilities around existing historic structures at the airport would potentially alter the feeling of those historic structures that contribute to the NHLD.

4.1.3 Potential Implementation Phase Direct and Indirect Effects to Cultural Resources

The proposed BEAR kit location at GSN is immediately adjacent to two historic structures (bunkers) that are contributing elements to the Aslito/Isley Field NHLD. The billeting of personnel at the BEAR kit location during Divert activity would occur when adequate commercial billeting is limited for some reason. This temporary billeting of personnel could have potential adverse effects. However, this area has been used in the past for temporary military billeting during exercises, military personnel are briefed and educated on preservation and protection of historic structures.

Billeting of Divert personnel at the BEAR kit within the Aslito/Isley Field NHLD could have indirect adverse effects on the integrity of feeling and setting of the landmark by altering the number of visitors to the landmark and by increasing traffic at the landmark. In addition, fuel supply trucks operating as part of Divert activities could potentially have direct and indirect adverse effects to the landmark by increasing vibration effects to standing structures and by increasing traffic volumes within the landmark boundaries, although, as mentioned above, a 2002 study conducted by the Caltrans found that earthborn vibration from transportation along existing paved roads has virtually no impact on historic buildings, especially concrete buildings that withstood WWII.

The implementation phase of the Divert project would also have an indirect adverse effect on historic properties in the form of increased aircraft noise under the high-noise scenario for Divert activities and exercises, which involves F-16 and F-22 fighter aircraft use of Saipan International Airport. Under 36 CFR 800.5, effects include the introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features. On Saipan, increased aircraft noise would constitute an indirect adverse impact on the integrity of feeling of the Saipan Landing Beaches and

Aslito/Isley Field portions of the Saipan Landing Beaches, Aslito/Isley Field, and Marpi Point NHL as well as the Japanese 20mm Cannon Blockhouse on the south coast of Saipan. Increased aircraft noise would also have an indirect adverse impact on the integrity of feeling of the Tinian Landing Beaches, Ushi Point Field, and North Field NHL on Tinian.

4.2 Potential Adverse Effects to Cultural Resources – Tinian Alternative

Previous cultural resources research on Tinian suggests that Divert-related construction and ongoing Divert-related activity could potentially have direct and indirect adverse effects on historic properties. San Jose contains several NRHP-listed properties, and many historic sites have been recorded close to TNI (Figure 4).

Note that although Tinian is home to the Tinian Landing Beaches, Ushi Point Field, and North Field NHL, the landmark is well to the north of the Divert action APE and the resource is unlikely to experience any direct or indirect adverse effects as a result of the action except under the Saipan Alternative (see above).

4.2.1 Potential Direct Construction Phase Effects to Cultural Resources

Construction of fuel storage and distribution facilities at the Port of Tinian would have no known direct effects to historic resources. The port does not contain known NRHP-listed or NRHP-eligible properties.

During construction of Divert-related facilities on Tinian, construction materials would be transported by truck from the port to the airport. Construction traffic would pass close to (within .1 miles) the NRHP-listed House of Taga and the Nanyo Kohatsu Kabushiki Kaisha Ice Storage Building in San Jose (Figure 5). Construction traffic has no potential to cause adverse effects to these structures, since, as noted above for transportation routes on Saipan, earthborn vibration from transportation along existing paved roads has virtually no potential to effect historic buildings (Caltrans 2002).

4.2.2 Potential Indirect Construction Phase Effects to Cultural Resources

There are no Construction Phase, indirect effects to known historic properties for the Tinian Alternative. However, effects to unrecorded or previously undiscovered cultural resources are possible.

4.2.3 Potential Implementation Phase Direct and Indirect Effects to Cultural Resources

Because of the limited precision of the boundaries of the historic sites recorded near Tinian International Airport, it is not possible to evaluate whether use of the proposed BEAR kit location for temporary living quarters would cause adverse effects to these resources.

Divert-related fuel truck traffic from the port to the airport could also have indirect adverse effects to the NRHP-listed House of Taga, Nanyo Kohatsu Kabushiki Kaisha Ice Storage Building, and a Japanese-era structure of unknown function in San Jose. However, any effects would be short-lived and would only occur during Divert activities and exercises.

The implementation phase of the Divert project would also have an indirect adverse effect on historic properties in the form of increased aircraft noise under the high-noise scenario for Divert activities and exercises, which involves F-16 and F-22 fighter aircraft use of TNI. On Tinian, increased aircraft noise could constitute an indirect adverse impact on historic properties located near the airport including the Gurguan Airfield site and the Naval Air Base HQ site.

5. Summary

In summary, the following historic properties have been identified on Saipan and Tinian, within the APE, that may be affected by construction and/or implementation, whether direct or indirect:

1. Saipan Construction Phase Area of Potential Effect - Direct
    - Aslito/Isley Field National Historic District portion of the Landing Beaches, Aslito/lsley Field, and Marpi Point National Historic Landmark (NHL)
    - Newly recorded, potentially eligible structures, sites, and features at Aslito/Isley Field that date to the period of significance for the NHL and may contribute to its significance
    - Newly recorded pre-contact isolated occurrences that do not contribute to the NHL
    - Additional undiscovered or unanticipated recourses
2. Saipan Construction Phase Area of Potential Effect – Indirect
    - All of the above **plus** the Japanese hospital and Campaneyan Kristo Rai in Garapan
3. Saipan Implementation Phase Area of Potential Effect - Direct
    - All of the above
4. Saipan Implementation Phase Area of Potential Effect - Indirect
    - All of the above **plus** Saipan Landing Beaches portion of the Landing Beaches, Aslito/Isley Field and Marpi Point NHL and the Tinian Landing Beaches, Ushi Point Field, and North Field NHL
5. Tinian Construction and Implementation Phase Areas of Potential Effect - Direct and Indirect
    - US anti-aircraft artillery site near TNI
    - House of Taga (San Jose)
    - Nanyo Kohatsu Kabushiki Kaisha Ice Storage Building (San Jose)
    - Additional undiscovered or unanticipated recourses

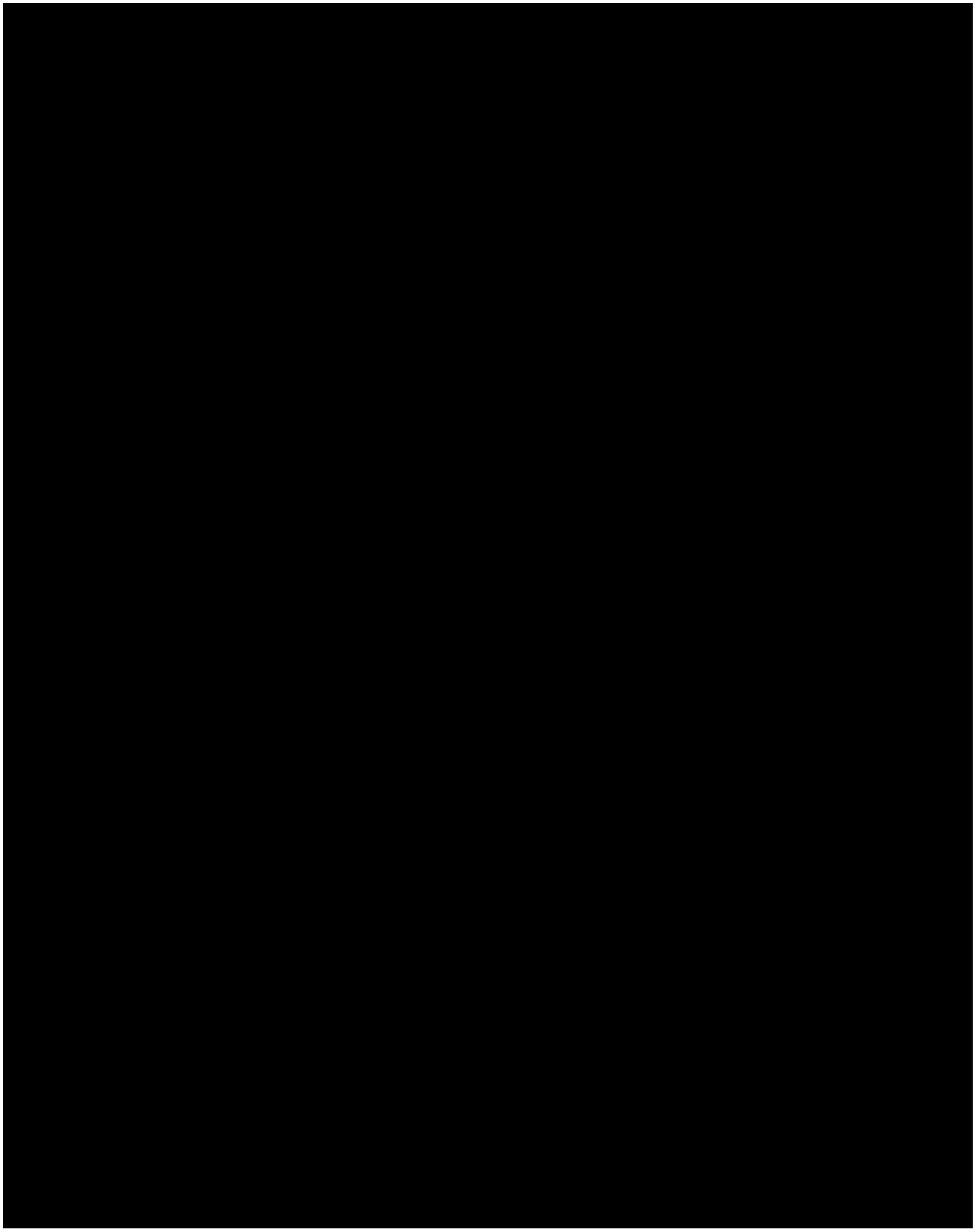


Figure 4. Cultural resources on Tinian.

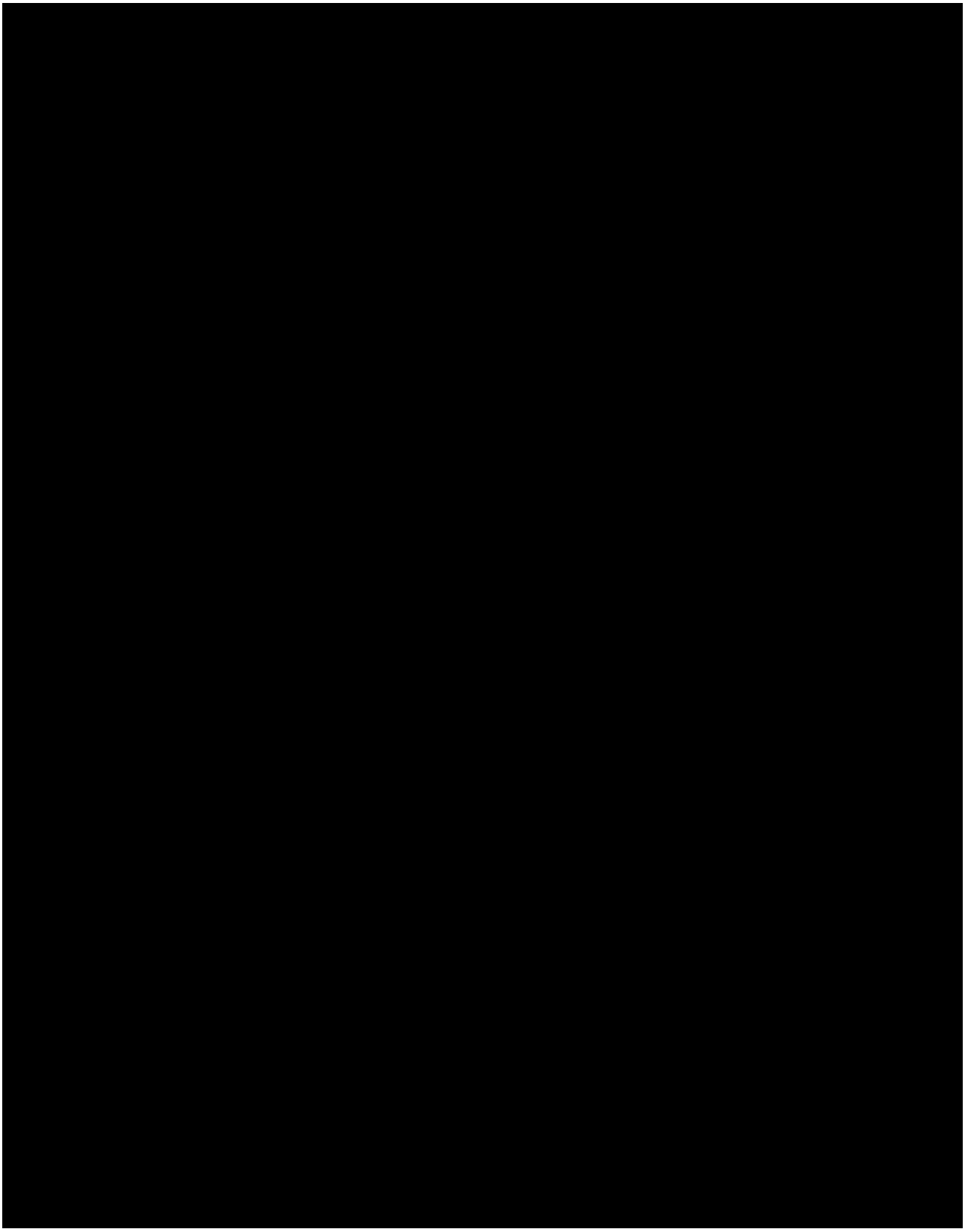


Figure 5. Divert truck routes, Tinian.