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Preserving America's Heritage

October 9, 2015

Honorable Jonathan Jarvis
Director
National Park Service
1849 C Street, NW
Washington, DC 20240

Ref: *Request for Section 213 Report Regarding effects to the Tinian National Historic Landmark*

Dear Mr. Jarvis:

Pursuant to Section 213 of the National Historic Preservation Act (NHPA), the Advisory Council on Historic Preservation (ACHP) requests that the National Park Service (NPS) provide an assessment of how the United States Marine Corps Forces, Pacific (MARFORPAC) plan to establish ranges and training areas for Commonwealth of the Northern Mariana Islands Joint Military Training (known as CJMT), within the Tinian Landing Beaches, Ushi Point & North Fields, Tinian Island National Historic Landmark (collectively known as the Tinian NHL) could affect the integrity and physical interpretation of the Tinian NHL. Since 2013, the ACHP has been consulting with MARFORPAC, the Commonwealth of the Northern Mariana Islands (CNMI) Historic Preservation Office, the CNMI Governor's office, various park units within the Marianas and the Pacific West Region of the NPS, and numerous other parties concerned with the effects of the CJMT on the Tinian NHL.

The proposed action is to establish a series of live-fire ranges, training courses, and maneuver areas within the CNMI to reduce existing joint service training deficiencies and meet the U.S. Pacific Command Service Components' unfilled unit level and combined level training requirements in the Western Pacific. The proposed action includes range construction, range management, expanded training and operations (to include combined arms, livefire, and maneuver training), establishment of danger zones, and designation of Special Use Airspace, all to support simultaneous and integrated training. Many unresolved issues in Section 106 consultation for this proposed undertaking pertain to the compatibility of this development with the historic character of this NHL.

The Tinian NHL is a heritage tourism site for CNMI and there is concern that the construction and use of the firing range may severely impact the NHL and suitability limit future interpretation and heritage tourism. This includes the potential loss of access because given the absence of a predictable schedule for use of the range. Currently, while the land the Tinian NHL is on is under a military use lease, it is for all purposes open to the public. To better assess the unresolved issues regarding the project's potential effects to the NHL, we request the NPS' views on the impact to the integrity of the NHL posed by the proposed volume, design, and location of new construction.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

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We would also ask that you provide recommendations as to measures that could avoid, minimize, or mitigate adverse effects to the NHL should the CJMT go forward as currently proposed.

In order to inform our participation in this consultation, we request that you provide the Section 213 report within 60 days of your receipt of this request, in accordance with the developed guidance for requesting and coordinating Section 213 reports between the ACHP and NPS. At this time MARFORPAC is still identifying historic properties within the area of potential effects; this report will greatly assist the ACHP and all other parties to more comprehensively assess the effects to the significance and integrity of the historic properties, which is the next step in the Section 106 process. We understand that the Pacific West Regional Office may be asked to prepare the report. In anticipation of our request we have spoken with Ms. Elaine Jackson-Retondo, NHL Program Coordinator for that office, and understand that the Regional Office has adequate information on the undertaking to complete the report.

Ms. Katharine Kerr is representing the ACHP in this consultation and would be pleased to assist you or the Regional Office. She can be reached at (202) 517-0216 or by email at kkerr@achp.gov. We are grateful for your assistance and look forward to receiving the report.

Sincerely,

A handwritten signature in blue ink that reads "John M. Fowler". The signature is written in a cursive style with a large initial "J" and "F".

John M. Fowler
Executive Director