

April 1, 2024

Mitch Crosby Airport Commissioner Modoc County Road Department 202 W 4th Street Alturas. CA 96101

Camille Garibaldi
Environmental Protection Specialist
Federal Aviation Administration
Western-Pacific Region
Planning & Programming Branch
777 S Aviation Blvd, Ste 150
El Segundo, CA 90245

Dear Mr. Crosby and Ms. Garibaldi:

The Tule Lake Committee is an all-volunteer, non-profit organization that represents survivors and descendants of Japanese Americans who were incarcerated at Tule Lake. In our organization's mission to protect and preserve the Tule Lake site, we've spent the past 20 years fighting FAA and Modoc County efforts to destroy the Tule Lake concentration camp site and this has been our mantra: "Do not build a fence on the site of the Tule Lake concentration camp. An airfield can be moved but it is impossible to move a sacred historic site."

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Our community is once again filled with shock, pain and anger as FAA and Modoc County officials proceed with a plan that will desecrate the Tule Lake concentration camp with a massive security fence, arguably to protect the primitive airfield that operates within the boundaries of this American site of shame, a place of trauma and painful memory.

The offer to mitigate harm to this irreplaceable human and civil rights site with signage and an occasional prearranged group visit is a shamefully offensive gesture to survivors and descendants of Tule Lake. These are defective measures to mitigate harm, doing the exact opposite — telegraphing a complete lack of respect for the intent of the National Historic Preservation Act Section 106 consultation process and a deplorable insensitivity to the dehumanizing, traumatizing incarceration of 125,000 Japanese Americans whose persecution was based solely on race and ethnicity.

Such choices by the FAA and Modoc County arouse troubling reminders of the airfield's creation — of efforts to erase evidence of the concentration camp's existence in the Tulelake community — with homesteaders bulldozing the camp's Japanese American cemetery and using earth from the burial grounds to level the grid of ditches overlaying the airfield site.

The wartime mass removal stripped Japanese Americans of human and civil rights, an egregious violation of national ideals and principles that led to an unprecedented Presidential apology and monetary redress to victims of the injustice. But, despite acts of Congress and multiple U.S. Presidential actions to preserve this history, the current stewards of the Tule Lake concentration camp site, FAA and Modoc County, display an oblivious, shocking indifference to the site's significance, where our nation's rule of law was shredded, enabling the assault on the dignity and humanity of Japanese Americans.

Articulating the community's trauma, humiliation and outrage over the continuing threat of an airfield fence, at the age of 95 during the 2018 pilgrimage to Tule Lake, beloved and respected Tule Lake poet laureate and playwright Hiroshi Kashiwagi, a No-No and a renunciant had this to say:

It seems like we've lived with a fence all our lives, beginning at Arboga Prison and then at Tule Lake Concentration Camp. I mean a barbed-wire fence with guard towers and search lights at night and sentries with guns that could explode in our faces.

Then after we were released from Tule Lake, there was a symbolic fence, an imaginary one, to ward off the disdain and contempt of those in our own community toward us because we were confined at Tule Lake Segregation Center as "disloyals" and "troublemakers."

Now, yet another fence at Tule Lake. This time a real one to cut off access to the camp site, the source of our painful memory, a sacred place we return to again and again for remembrance, for solace, for healing.

We cannot let this happen. We cannot let them hang this fence around us forever and ever. We just cannot. We must stop it.

The Tule Lake Committee began preservation efforts for the Tule Lake concentration camp site at the 2000 pilgrimage, a time of growing concern over the future of the Tulelake airfield. The County pursued post 9-11 Homeland Security funding that would pay for security fencing to protect the airfield against terrorist attacks, an unlikely occurrence in isolated Modoc County.

The "terrorist" threat soon evolved into thieving "two-legged critters," then evolved again into concern over mammalian wildlife collisions, even though according to the FAA, 98% of aviation wildlife strikes are with birds, and a fence will not prevent bird strikes.

The proposed Tulelake airfield fence will do nothing to protect crop-dusters from avian wildlife. The massive fence would, however, unnecessarily and greatly expand the footprint of the Tulelake airfield. It would create a devastating adverse effect, destroying the fabric and the integrity of the historic site. Fence construction would promote reckless demolition of subsurface structures and cultural resources, and create a visual blight that will obscure the sheer size and magnitude of the Tule Lake concentration camp.

After a decade of disagreement, we were encouraged by the FAA's and Modoc County's revisions in three key areas. They have agreed that the Tule Lake concentration camp site is eligible for listing on the National Register of Historic Places, that Tule Lake is a Traditional Cultural Property with significance and meaning to the Japanese American community, and that the airfield fence would have an "adverse effect" on the historic site's view shed. However, we continue to challenge the FAA's and Modoc County's failure to conduct subsurface research and comprehensive field work on the Tulelake airfield site, to identify underground structures and buried cultural resources before considering any potentially harmful destructive activity, a matter that remains unresolved.

The Tule Lake concentration camp site is a significant social justice site where more than 27,000 innocent Japanese Americans were imprisoned, and where 331 men, women and children died, the result of inadequate medical care, harsh living conditions, and hopelessness and despair. It is recognized as an International Site of Conscience, a historically significant site eligible for inclusion on the National Register of Historic Places, and a Traditional Cultural Property where Japanese Americans return, seeking spiritual and emotional solace and healing.

To mitigate harm to the site, the FAA and Modoc County must recognize that an airfield on a concentration camp site is an inherently inappropriate, incompatible use. The proposed fence is destructive to the view shed, and moreover, to the entire fabric of the site.

The only reasonable mitigation measure is to avoid building the fence. Moving the airfield to a less historically important site is an obvious strategy to address safety concerns. A feasibility study would address the need for a less-sensitive site for a new airfield and outline a process for decommissioning the Tulelake airfield, a path toward undoing the harm caused by flawed decision-making from an era when Jim Crow policies were the institutional norm.

Tule Lake Committee April 1, 2024

Tule Lake was a place of racial terrorism that created generations of anger, pain and grief in the hearts and minds of Japanese Americans.

The FAA's and Modoc County's insistence on actions that vandalize rather than help to preserve an important part of American history, amplify the pain, trauma, anger and sadness our families and communities endure.

We urge you to consider alternatives to such destructive efforts and to recognize the opportunity we have to work together constructively to begin healing the intergenerational wounds created by racism, fear and failed political leadership.

Sincerely,

Tule Lake Board of Directors

Hiroshi Shimizu, Chair Barbara Takei, CFO Ken Nomiyama, Secretary Harriet Fukushima Satsuki Ina Tamiko Nimura Stan Shikuma

## Attachments:

- March 2024 excerpts of public comment on mitigation measures
- 2013 through 2017 comments on the proposed Tule Lake fence project

## Sampling of Japanese American Responses to FAA and Modoc County Proposal to Mitigate Harm of Tulelake Airfield Fence, March 18-31, 2024

From 2013 through 2017 in letters, emails and petitions on <a href="www.change.org/tulelake">www.change.org/tulelake</a> and <a href="www.18millionrising.org">www.18millionrising.org</a>, over 50,000 Japanese Americans responded to the FAA and Modoc County's request for public comment in a concurrent environmental review and National Historic Preservation Act processes concerning the fence project. The unanimous response was a resounding "NO" to the fence. Along with this document, we attached the earlier 200-page database containing thousands of relevant comments.

We ask why FAA and Modoc County (population 8,700), once again ignored the message sent by more than 50,000 Japanese American voices and others who unanimously declared, DO NOT BUILD A FENCE on the site of the Tule Lake concentration camp?

Echoing the sentiments of the previous decade, in the past two weeks over 300 Japanese American survivors and descendants submitted emails in the Section 106 public comment period that ends today. The messages are essentially this: Do not build a fence. Move the airfield. Conduct a feasibility study to move the airfield. Promote healing by preserving the site.

Below is a sampling of comments sent to Modoc County, cc:ed to the Tule Lake Committee in the final two-weeks of March:

- My family was virtually ripped apart during their incarceration there, separating my mother and sister from my father not knowing his fate until his release after the war. Both my parents were U.S. citizens and never fully recovered from the suffering they experienced. The Tule Lake concentration camp site represents the suffering that they and others went through. The Tule Lake site that should always be remembered as part of the history of the United States and should never happen again. I urge you to find another location for the airport.
- It is not possible to erase the well-documented story of the Tule Lake concentration camp. It is not possible to erase the memories of those who were incarcerated there and the memories of their descendants. It is not possible to erase growing public and political support for the preservation of important historic sites like Tule Lake. What is possible is giving serious consideration to relocating the airport to another area and working with various parties, including Japanese Americans, to make this a reality. My sincere hope is that you can summon the will to do this.
- My father's family was assigned to Barrack 5, which borders the airfield. I
  would be devastated if all that remained to honor my grandparents and
  relatives was a commercial airfield. Please reconsider the appropriateness of
  an airfield on a historical site, as well as, the addition of fencing.

- The fence that Modoc County wants to build would vandalize the historical site. It would defile the healing process that many of us are still going through. There are many others who share these same feelings, who want the site preserved, not desecrated with a massive security fence that says we are unwelcome.
- Why are you ignoring the sentiments of so many descendants and survivors of the Tule Lake concentration camp?
- The FAA should conduct a feasibility study to examine moving the Tulelake airfield from the concentration camp site away from our National Historic Landmark and National Monument. Failing to consider other options continues our government's history of acting in haste and without ethical political leadership. Erecting the fence literally cuts off access to this crucial historical lesson.
- Tule Lake was unique among the 10 American concentration camps, becoming a maximum security Segregation Center used to punish over 12,000 Japanese Americans who dared to speak out against the U.S. government's abuse. Segregation to Tule Lake divided the community, it divided families, and falsely framed the imprisoned dissenters as disloyal to America, a stigma that persists even today. Rather than continuing to pour salt into the wounds created by the government's racism, help us heal. Move the airfield.
- The fence that Modoc County wants to build would vandalize the historical site. It would defile the healing process that many of us are still going through. There are many others who share these same feelings, who want the site preserved, not desecrated with a massive security fence that says we are unwelcome.
- This airfield would erase a monumental, painful part of Japanese-American history, and American history in general. This erasure is the government's legacy: one that continues to perpetuate rather than repair the violence it inflicted. Do you really want this to be part of your personal legacy as well? Do you want to contribute to this intergenerational pain?
- Undertake an appropriate and comprehensive survey of the Tule Lake site; surface and subsurface historic WWII resources must be documented and understood before further damage transpires.
- I join the chorus asking you to please recognize the cultural significance of Tule Lake to all Americans. It is a small price to pay to relocate an airport; a historical site cannot be moved. I ask that you, and the FAA not be complicit in the erasure of this singular chapter of American history, which presents a most powerful lesson about the capacity of xenophobia and racism to result in the egregious concentration and deaths of groups of people based on ethnic identity, even despite citizenship.

- This site is sacred to us, and is at risk of desecration. The airfield was made from digging up gravel in the camp cemetery. Hasn't enough harm been done to our community? We implore you to stop the destruction of this historic site.
- The FAA's proposed mitigation measures are woefully inadequate to address the protection of our nation's history. The FAA should conduct a feasibility study to examine moving the Tulelake airfield from the concentration camp site away from our National Historic Landmark and National Monument. Failing to consider other options continues our government's history of acting in haste and without ethical political leadership. Erecting the fence literally cuts off access to this crucial historical lesson. We remind you that with the determination that there is an adverse effect to a historic property, the negotiations must include ways to avoid, not just minimize, adverse effects.
- If the U.S. government could find a place for 27,000 Japanese Americans in Modoc County one of the most sparsely populated counties in the United States it can certainly find space for a crop duster's airfield to safely operate.
- Putting up the ridiculously tall fence to keep future generations of all peoples from seeing this shameful past in American history is a "slap in the face" to the many, many thousands of Americans of Japanese descent who suffered so much during those years behind the barbed wire fences. Please, please, please do not let this fence go up. An airfield can be moved; an historic site of over a thousand acres cannot.
- The remains of the camps are monuments to injustice, to a government swayed by racism, politics, money and power. They are living memorials to a community that was destroyed by government lies and manipulation. Disfiguring the Tule Lake camp site further is yet another slap in the face of the Japanese American community.
- While the land at Tule Lake may not have any personal meaning to your Commission, it represents an important part of American history that must be preserved. It is considered hallowed ground by those families whose loved ones were imprisoned there. To walk the land is to remember their memories, feel their emotions, and honor their presence. Please do not construct the fence forever blocking access to this hallowed ground.
- The proposed fence is "an unacceptable choice and seriously appears to be an effort at erasing evidence of the the terrible consequences of unbridled nationalism poisoned with racism and irrational fear.
- We have suffered enough! Please consider the lives and histories of us as you make your decision. You can help to right the wrongs of the past.
- My father was beaten, starved, and held in a military stockade without charges. I cannot erase that memory. We must stop the fence that adds further disregard for suffering that occurred on the land. Crop dusting can be accomplished in the remaining vast area outside of the sacred site.

- At a time when our country is so divided over what "patriotism," "civil rights," and "citizenship" means, it is more important than ever to preserve national historic monuments like Tule Lake that light the way for respectful and informed dialogue on these issues. Please respect the historical, spiritual and national meaning of this unique site in our country's History.
- If it's so important to you to have a fence, you must move the airfield somewhere else so as to leave the Tule Lake site intact.
- Instead of building a perimeter fence in preparation for covering this sacred site with asphalt and an airport, Modoc County should work with the National Park Service to preserve this site and open it to the public as a proper memorial. It is time our nation end the racism and the cover-up of our racist past. Education through memorials and museums is key to this effort. Please do the right thing.
- Preserving sites of momentous historic events be it good or bad are
  necessary for remembering. I am a survivor of the camps. Their existence
  must not be forgotten and what better way of not forgetting than keeping their
  remains visibly intact. Just as Auschwitz has been kept intact.
- My father was reluctant to speak of his incarceration at Tule Lake, but visiting this site has given me some understanding of his personal struggles and this chapter of American history. As I reflect, it speaks volumes to me that my father had placed a framed photo of Abraham Lincoln by our front door and encouraged me to study the Gettysburg Address. Coincidentally, Executive Order 9066 was passed some "fourscore" years ago, and the resounding words of Lincoln apply thusly so today as they did during the Civil War: that those who "struggle here, have consecrated it (this land), far above our poor power to add or detract. The world will little note, nor long remember what we say here, but it can never forget what they did here. It is for us the living. rather to be dedicated here to the unfinished work which they who fought here have thus far so nobly advanced." From the time EO 9066 was passed to the time my father finally emerged from behind barbed wire was nearly as long as the entire Civil War. We would no more think of placing a fence through the battlefields of Gettysburg and should never consider such a desecration at Tule Lake concentration camp.

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