



February 10, 2023

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RE: Desecration of Tule Lake Concentration Camp

I write on behalf of the Tule Lake Committee, a non-profit organization composed of survivors and descendants of Japanese Americans incarcerated during WWII at the Tule Lake concentration camp and Segregation Center in Modoc County. Our mission has been the preservation of this site and its dark story of racism, failed political leadership and hysteria that caused the unjust incarceration of 125,000 innocent Japanese Americans.

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For more than a decade, the Tule Lake Committee has fought to stop the FAA and Modoc County from desecrating 359 acres of the former Tule Lake Segregation Center (TLSC). The barracks area where 27,000 Japanese Americans lived and 331 died while imprisoned continues to be used as an airfield for crop dusters, an inappropriate use that was approved in the era of Jim Crow racism that blessed the desecration and erasure of this concentration camp.

In February 2022, we were grateful to see President Biden's Day of Remembrance Proclamation that assured preservation of Japanese American incarceration sites was "proof of our nation's commitment to facing the wrongs of our past," and the goal of "healing the pain still felt by survivors and their descendants."

On October 20, 2022 we received the FAA's letter to California SHPO Julianne Polanco accompanied by the flawed Sikes & Arrington cultural resource study. This report brought more pain and injury, with a framing that appears directed toward preserving and expanding the airfield.

The attached document is the Tule Lake Committee's response. It was prepared by the Tule Lake Committee's pro bono consultant, Janet P. Eidsness, who served for 13 years as the THPO for Blue Lake Rancheria Tribe and has over 40 years of experience in the field of cultural resources management and historic preservation law, policies and best practices. She was an early proponent of the concept of Traditional Cultural Properties. In 1990, in consultation with Tom King who, with his spouse Pat Parker authored *National Register Bulletin 38* on Traditional Cultural Properties for the NPS, Eidsness prepared one of the first such nominations for Lava Beds National Monument (LBE) and the Modoc bands that share ancestral ties to the region's history and pre-history.

Curiously, despite its obvious significance and relevance, the Modoc LBE Archaeological District nomination (Eidsness and Smith 1990) to the National Register of Historic Places was not included in the Revised September 2022 Sikes and Arrington cultural resources study.

Eidsness cites potent evidence that the **identification of TLSC historic properties in the Direct Area of Potential Effects is incomplete.** Caitlin Bishop's (2022) ground-penetrating radar study across Block 81 in the eastern "Alaska" prisoner housing area revealed buried rooms dug below barracks by prisoners for various reasons, e.g., as places to hide from the police, have privacy, escape the heat, secret away possessions, or other reasons. Such rooms are reported at Manzanar NHL (Burton 2002) and other concentration camps, and contribute to the significance of the TLSC Traditional Cultural Property (TCP), National Historic Landmark (NHL) and Historic District under Criterion D. Eidsness also noted that Sikes and Arrington failed to identify, record, and assess effects on the road grid on the airfield property that outlines the layout of the former prisoner housing area. The grid is an important feature that identifies locations of the wards and blocks, enabling descendants find the areas where loved ones lived during incarceration.

In closing, we ask the FAA to consider their response to President Biden's Day of Remembrance Proclamation. We ask the FAA to help protect and preserve an important American civil rights site, not destroy it.

The FAA has the power to move the airfield. We ask the FAA to explore the only reasonable possibility -- to relocate the airfield -- because it is impossible to move a historic site.

Cordially,



Barbara Takei  
On behalf of the Tule Lake Committee

Attachments:

Comments by Janet P. Eidsness on behalf of the Tule Lake Committee, February 9, 2023 responding to "Supplemental Cultural Resources Report and Effects Assessment for the Airport Perimeter Fence Project, Tulelake Municipal Airport, Modoc County, CA," by Nancy Sikes and Cindy Arrington, for the County of Modoc and the Federal Aviation Administration. Revised September 2022.

Day of Remembrance Presidential Proclamation dated February 18, 2022.

Cc:

Mark McClardy Director, FAA Western-Pacific Region  
Julianne Polanco, State Historic Preservation Officer  
Tristan Tozer, Historian, California Office of Historic Preservation  
Stephanie Burkhart, NPS Assoc. Regional Director  
Elaine Jackson-Retondo, NPS History Programs  
Chris Mengel, Superintendent Tule Lake NM  
Jessica Reid, TULE/LABE Cultural Resources  
Phillip Miller, Caltrans  
Betsy Merritt, NTHP  
Rob Nieweg, NTHP  
Christopher Cody, NTHP  
Ron Sundergill, NPCA  
Michelle Magalong, APIIHP  
David Inoue, JAACL National Director  
Patty Wada, JAACL NCWNP Region

**Tule Lake Committee Comments Concerning  
SUPPLEMENTAL CULTURAL RESOURCES REPORT AND EFFECTS ASSESSMENT FOR  
THE AIRPORT PERIMETER FENCE PROJECT, TULELAKE MUNICIPAL AIRPORT,  
MODOC COUNTY, CALIFORNIA**

**By Nancy Sikes and Cindy Arrington, Natural Resources Investigations Company,  
Sacramento, for the County of Modoc and the Federal Aviation Administration  
Revised September 2022**

**By Janet P. Eidsness, M.A**

**February 9, 2023**



Tulelake Municipal Airport property overlaying WRA 1945 historic map of Tule Lake Segregation Center

The following comments are submitted to the Federal Aviation Administration (FAA) as the lead federal agency responsible for compliance for the 16,000-ft-long proposed Airfield perimeter fence project (undertaking) with Section 106 of the National Historic Preservation Act (NHPA), to the California State Historic Preservation Officer (SHPO), and to the County of Modoc Office of the Road Commissioner as the lead state agency for compliance with the California Environmental Quality Act (CEQA). The project is located on 359 acres of fee land in Newell, California, on the Tulelake Municipal Airport, and overlaying much of the former prisoner housing area of the proposed nationally recognized World War II era Tule Lake Segregation Center (TLSC). The FAA recognizes TLSC is eligible for the National Register of Historic Places (NRHP) as a Traditional Cultural Place (TCP) important to the Japanese American community.

## **PUBLIC SUPPORT RECOMMENDING AIRPORT BE MOVED**

More than 50,000 people have signed petitions opposing the proposed fence around the Tulelake Municipal Airport that occupies the former WWII Japanese American prisoner housing area at the Tule Lake Segregation Center. Petition #1 was authored by Satsuki Ina, a psychologist whose practice and writings and advocacy address the intergenerational trauma carried by the Japanese American community caused by the unjust WWII incarceration of more than 125,000 members. In addition to the many testimonials on the Petition.Org site, Ina's posting reads:

Having an airport, even a small and primitive airport, operating in the middle of the Tule Lake concentration camp site, is inappropriate and demeans the memory of more than 24,000 people who were incarcerated in Tule Lake. The proposed fence closes off remembrance of this civil and human rights tragedy and it will destroy the integrity of this unique historic site. The fence will eliminate opportunities for Japanese Americans and others to visit reflect and mourn. This exclusion will be a permanent legacy of Modoc County's and the Federal Aviation Administration's failure to comprehend the traumatic injustice created by the racism, fed by wartime greed and hysteria and failed political leadership that led to the mass incarceration.

The Tule Lake site has not yet been comprehensively surveyed to document surface and subsurface historic WWII resources. Consequently, it is a priority to identify structures and artifacts before more damage to the site takes place. In July 2014, the Tule Lake Committee sought legally-mandated environmental review of the entire airport area, which occupies two-thirds of the former Tule Lake site. However, instead of conducting careful examination of the entire area WITHIN the fence project, including subsurface review, the County and the FAA have argued their environmental responsibility is confined to surveying only a narrow strip of land where the 3-mile long fence would directly lie...

Seeking a long-term solution to the problem of preserving an irreplaceable historic site, we raised the issue of moving the Tulelake airport to a less sensitive nearby location. It was clear to all interested parties that a small airport can be moved. **It is not possible to move a historic site.** (Ina 2013)

In 2018, The Tule Lake Committee (TLC) sent this record of more than 50,000 signatures on petitions to the FAA, County of Modoc, and State Historic Preservation Officer (SHPO), among others (Takei 2018). This is no small outcry, this matters to a lot of people.

The proposed measures to mitigate adverse effects of the proposed fence on this historic property (providing limited and controlled access for Japanese Americans and posting an interpretive sign at the Airport gate) are insufficient for an historic property of this magnitude and importance. The TLSC is a National Historic Landmark (NHL), Historic District, and Traditional Cultural Place (TCP) of special importance to Japanese Americans. *National Register of Historic Places* (NRHP) guidance (currently under revision), observes:

Traditional cultural values are central to the way a community of people defines itself, and maintaining these values is vital to maintaining a community's sense of identity. The

*places* to which traditional cultural value is attributed are “traditional cultural places [TCP].” Damage to or infringement upon these places may be deeply offensive to, and even destructive of a community that values them. It is important that TCPs be considered carefully in planning activities that might affect them, or affect how people access and use them. (NPS 10/27/22 revised draft text *National Register Bulletin* 38, page 12)

As historic preservation expert and co-author of NPS (1990) Guidance on identifying and documenting TCPs, Thomas F. King commented in 2017 to Modoc County’s Mitch Crosby:

You and the parties in this matter back up, take the long view, and seek alternatives that would (a) avoid new and continuing impacts on the TLSC landscape, (b) move toward undoing the impacts that have occurred in the past, and (c) explore ways to use the landscape for the educational and cultural benefit of Modoc County, the Japanese American community, and all Americans. (T.F. King comments 10/1/17 to [mitchcrosby@co.modoc.ca.us](mailto:mitchcrosby@co.modoc.ca.us)).

### **TLSC TRADITIONAL CULTURAL PLACE (TCP) SIGNIFICANCE (AMENDED)**

The TLSC is recognized by SHPO and FAA as a Traditional Cultural Place (TCP) important to Japanese Americans as first proposed in 2013 by the TLC’s historic preservation consultants, Janet Eidsness and Thomas F. King collaborating with Barbara Takei (2013). They stated it is eligible for the National Register under Criteria A (important events) and B (important persons) (Eidsness et al. 2013). For five years, the FAA discounted this proposal. In 2018, SHPO Polanco challenged the FAA, asking for its reasoning when SHPO staff found that the TLC consultants had “made a strong case for considering the TLSC a TCP” (Polanco 2018:2-3). In 2022, nine years after initially proposed, the FAA reversed its opinion and reported to the SHPO that the Airport is within the boundaries of a TLSC TCP... (and it) is eligible for the National Register” (Garibaldi 2022:2). Further, the FAA recognizes the TLC and the Japanese American Citizens League, among others, as legitimate consulting parties to this NHPA Section 106 action (Garibaldi 2022:3).

The present comments expand on the TLSC TCP eligibility by referring to new archaeological data from field investigations led by Caitlin Bishop (2019-2022) over a 6-acre area at TLSC Block 81 in the area commonly referred to as “Alaska.” This former prisoner housing area, a component of the TCP, Historic District and NHL, reveals significant archaeological research potential and the TCP (and possibly the other property types) is recommended eligible under NRHP Criterion D. It has and is likely to yield information important in history that is considered by the descendant community to be “...vital to understanding the reality of incarceration at Tule Lake Segregation Center... (because) such knowledge validates the Japanese American experience and acknowledges the true history of the United States” (Bishop 2022:12).

Bishop's recent research at TLSC, plus excavations at Manzanar National Historic Site (NHS) (Burton 2002) and reports from other WWII era Segregation Centers reveal that subterranean rooms were dug in prisoner housing areas below former Barracks for various reasons (e.g., places to hide, escape the heat, find privacy, or hide personal items). Takei's research found narrative evidence of an underground cellar at TLSC Block 18, adjacent to the Airport runway. Thus, there is potential for future archaeological research to reveal information about life at TLSC housing area, intended to be hidden away from camp authorities and others.

Oral histories from former prisoners describe how they secretly removed floor boards to dig below the barracks to erect sake stills and hide valuables and other personal items. At the 2016 Tule Lake pilgrimage, an elderly Japanese American man who was a prisoner at TLSC told Eidsness that he hid an item under his Barrack's entry stairs. Long after the building was demolished, he searched for and found the item, giving him a sense of closure.

Yoshito Wayne Osaki was 19 years old when his family was forced to leave their home in the Sacramento delta area and spent four traumatic years imprisoned at Tule Lake. Writing about his experience in *Making Home From War* (Osaki 2011), Wayne eloquently describes burying his painful memories in a most literal way.

Before leaving camp, I buried my diary, in which I had written about many bitter memories: the Loyalty Oath, the stockade, the renunciation of my citizenship, the segregation and separation from my friends. I even buried the good memories I had committed to paper: my first dance, the sweat and intensity of playing baseball and basketball games, the laughs and hopes I shared with the new friends I made from California, Oregon, and Washington. I wanted to bury my words in Tule Lake – my pages of frustrations, disappointments, anger, and fear of a life behind barbed wire. I put the diary in a metal box, put the box in a hole in the ground, filled the hole with dirt, and turned away. (Osaki 2011)

Such oral history accounts may be expanded upon through recovery of artifacts and examination of the hidden rooms below Barracks, whether constructed by prisoners to provide private space, hide from officials, store personal items, or other reasons that may reveal resiliency and means to survive with dignity in inhumanly crowded conditions.

### **IMPORTANCE OF TLSC TCP INTEGRITY OF LOCATION, FEELING AND ASSOCIATION FOR JAPANESE AMERICANS**

The NHL documentation implicitly acknowledges Tule Lake's traditional cultural significance to the former prisoners, their friends and families, who as pilgrims to the site since 1969 ... "have found the physical remains at Tule Lake spark memories, discussions, and even reconciliations" (Burton and Farrell 2005:34).

Importantly, Japanese Americans with historical ties to the former World War II segregation center and their descendants, return, seeking the emotional power of place, to stand on the grounds that represent so much destruction and pain. Many come to look for tangible evidence

of the place where they or their mothers, fathers, uncles and other family members were incarcerated – to look for evidence of their Barracks, now outlined by the checker-boarded gridlines in red cinder marked streets. The grids are reminders of dark years, home to family members yet a time and place permeated by fear and worry and suspicion. The outlines of the street network are important for visitors to decipher and find locations of former prisoner facilities and common areas including specific blocks, barracks, mess halls, recreation halls, laundries, latrines and bathhouses, and the small gardens and ponds erected by prisoners as memorials and shrines.



### ***Not Another Fence***

By **Hiroshi Kashiwagi**, playwright and poet, imprisoned at Tule Lake as a No-No and renunciator (Nov. 8 1922 to Oct. 29 2019).

*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.*

(Written 2017, performed 2018 in Klamath Falls, OR)

More than 27,000 Japanese Americans were incarcerated at Tule Lake from May 1942 through March 1946. During the years of incarceration, 331 men, women and children died on the site. Their deaths were hastened by inadequate medical care, substandard living conditions, and a community filled with misery, depression and despair.

For survivors of the WWII incarceration and their descendants, visiting the site and being able to walk the grounds where their families were imprisoned for as long as five years is a powerful emotional and spiritual experience. A Tule Lake descendant describes "feeling ghosts all around" when visiting the site. "During the hot summer months, you feel the burning sun and grit of dust and wind peppering your skin. In winter months, wind makes the cold bitterer, with



the chill of rain or snow reminding visitors of the misery of life in shoddy tarpaper barracks, contemplating an uncertain and impoverished future, stripped of possessions, assets and dignity.” Others report an overwhelming sadness and grief, experiencing the magnitude of loss endured for the “crime” of having a Japanese face. There is anger and pain when seeing the concentration camp’s Cemetery that local homesteaders bulldozed – desecrating that hallowed ground to fill the grid of ditches surrounding the barracks to prepare for construction of the Tulelake Airfield.

### **INCOMPLETE INVENTORY OF PRISONER HOUSING AREA (DIRECT AND INDIRECT APE)**

There is compelling evidence of other unidentified archaeological elements in the Direct (and Indirect) Area of Potential Effects (APE) that will contribute to the significance of the greater TLSC TCP (Eidsness et al. 2013), Historic District (Burton and Farrell 2004) and NHL (Burton and Farrell 2005). Namely, subterranean rooms and pits dug by prisoners beneath Barracks that are significant under NRHP criterion D, as they are likely to contribute tangible, significant undocumented historic archaeological information related to the personal experiences of Japanese American prisoners at TLSC (Bishop 2022). Such features would pre-date the closing of TLSC on March 20, 1946. In addition, the unrecorded TLSC road grid outlines prisoner housing blocks and includes the firebreaks and the red-cinder covered roads that are clearly visible across much of the Airport property as discussed below.<sup>1</sup>

In 2013, California SHPO Carol Roland-Nawi objected to the FAA’s NRHP eligibility determination there are no historic properties within the Direct APE. She recognized...

Tulelake Airport is sited on land that contained the original [TLSC prisoner] residential barracks. The barracks were an integral part of TLSC. While the buildings have been removed, physical evidence of the camp, in the form of foundation remnants, roadway outlines, and garden plots, are evident throughout the APE. This physical evidence shows the property to convey its significance, despite the loss of the buildings. (Roland-Nawi 2013:2-3)

Despite SHPO Roland-Nawi’s position in 2013, in 2017 the FAA again failed to adequately scope historic property identification efforts (36CFR8004(a)) in concert with its consultants’ (Sikes et al. 2017). At the request of the Tule Lake Committee, historic preservation consultant Janet Eidsness submitted comments (2012, 2017) to Modoc County, the FAA and others about the inadequacies of the 2010 Jensen and 2017 Sikes et al. cultural resource studies. Notably, Eidsness critiqued the failure of both studies to inventory and map surface evidence of the road grid laying out the former prisoner residential area on Airfield property, and insufficient use of

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<sup>1</sup> See Eidsness et al. 2013: Map #3: Satellite imagery of Newell, CA downloaded 6/9/13 from Google Earth - Internet Access to Map #3: URL: <https://maps.google.com/maps?client=safari&oe=UTF-8&q=newell,+ca&ie=UTF-8&hq=&hnear=0x54c94ce7530e7693:0x9e44fc6c183d2ee6,Newell,+CA&gl=us&ei=mXyxUa-DE4PRiwL9n4GQCg&ved=0CJQBELYD> Or GPS : N 41 53 08.18 W121 21 50.40).

techniques to identify buried features such as cellars, rooms, hiding spaces and artifacts caches below former Barracks dug by prisoners, both of which are overlapped by the Direct APE.

The Tule Lake Committee, as a Consulting Party, submitted comments relevant to 800.4(a)(2) “data concerning possible historic properties not yet identified”; to 800.4(a)(3) “knowledge of, or concerns with, historic properties in the area, and ... issues relating to the undertaking’s potential effects on historic properties.” The FAA agency official at that time (Pomeroy) failed to make a “reasonable and good faith effort to carry out appropriate identification efforts” per 800.4(b)(1).

In 2018 SHPO Polanco (2018:2) commented (presumably) on the Sikes et al. (2017) initial survey report that the current Sikes and Arrington (2022) report is a supplement to, asking for a suitable image showing where the proposed fence alignment is “in relation to all remnants, foundations, and other contributors to the” TLSC. That map and the updated versions from Sikes and Arrington (2022:Figures 6, 7A, 7B, 8C, 9D) all lack the road network across the former prisoner housing area on the present Airfield property that is clearly visible in aerial imagery as was pointed out by Eidsness in 2013 (see Footnote 1). Despite their brief mention of numerous undocumented TLSC road grid and fuel break traces, building pads and structure foundations, Sikes and Arrington’s pedestrian field survey only reports on and maps (Figure 6, 7A, 7B, 8C, 9D) two latrine foundations (at Blocks 71 and 73), a fence remnant, and guard tower foundations, all recommended as contributing to significance of the TLSC Historic District, NHL and TCP. They noted the three earlier surveys of the Airport property did not record any discrete historic features associated with the TLSC (ECORP 2002; Jensen 2010; Vann 2007) (Sikes and Arrington 2022:53, Footnote 15). These data fail to meet the request in 2018 of SHPO Polanco for a map showing the proposed fence alignment in relation to surface and potential buried features (e.g., road grid, outlines of blocks, subsurface rooms) that would contribute to the significance of the TLSC TCP, NHP and Historic District.

Sikes and Arrington (2022) failed to consider and implement a research design to focus historic property identification efforts on the extant road grid marking the layout of the prisoner residential area. Described below are observations drawn from the revised Sikes and Arrington (2022) Supplemental Report about the former built environment in the Airfield vicinity, focusing on former structural features (e.g., cinder roads, building pads, concrete foundations, streets, firebreaks, and blocks) that contained barracks and other buildings (e.g., via use of historic maps, aerial photographs and surface exam). They also failed to employ appropriate archaeological survey sampling efforts (e.g., trenching in sensitive areas such as former Barracks locations, ground-penetrating radar [GPR]), to systematically determine presence-absence or identify associated prisoner residential area historic features and artifacts within the 3-ft-deep by 40-ft-wide direct APE now on Airport property.).

Described by Sikes and Arrington (2022:33-34) as part of the “layout of and life at Tule Lake,” the “inmate residential blocks” are:

...located on the northeast side of the central area, away from the highway, and separated from the rest of the developed central area by a 400-foot-wide firebreak. The prisoner residential blocks were divided into eight wards... [that were typically composed of 9

blocks, but ranged in size from 6 to 14 blocks]<sup>2</sup>], bounded on all sides by 200-foot-wide firebreaks. (Burton and Farrell 2004:5-6; NPS 2016:106, (WRA 1945 historic map of Tule Lake);

One building in each prisoner block was intended to be used for recreation, but most were converted to offices, stores, canteens, a beauty parlor, a barber shop, four judo halls, eight Buddhist churches (sic), a Catholic church, and three Christian churches. ...In the firebreaks, there were three fire stations, a fish store, an outdoor stage, a funeral parlor and cemetery, a high school, 31 baseball fields, and a sumo wrestling pit... (Burton and Farrell 2004:5-6) [emphasis added];

...[Initially] Nikkei were housed in more than 1,000 barracks served by latrines, mess halls, and other communal buildings...[and] designed to be a self-contained community... The camp was surrounded by a barbed wire fence and six guard towers... Tule Lake would become the largest of the ten WRA centers, with a peak population of 18,789 reached on Christmas Day 1944 (Burton and Farrell 2004, 2005; NPS 2016:4-5) [emphasis added];

After the camp was converted to a maximum-security segregation center in 1943, the number of guard towers increased from six to 28. (Sikes and Arrington 2022:36)

The population grew to over 18,000 people, giving Tule Lake the largest population of the ten WRA concentration camps. Ten more blocks were added to the existing 67 blocks to accommodate new inmates, making a total of 77 blocks. Each of the blocks typically had 14 barrack buildings, men's and women's latrines, bathhouses, a mess hall, recreation building, and laundry.<sup>3</sup> (Source: WRA 1945 historic map of Tule Lake). All together, **1,036 barracks** were served by 518 latrines, mess halls, and other communal buildings (Burton and Farrell 2004:5, 9-10, 30; Sikes and Arrington 2022:36) [emphasis added].

...Physically, the barbed wire fences and guard towers were constant reminders of the lack of freedom. ... The flimsy barracks and public latrines and shower houses provided no privacy and few conveniences... and provided little refuge from blowing winds, dust, cold and heat (Burton and Farrell 2004, 2005). (Sikes and Arrington 2022:32-34) [emphasis added];

Although prisoner barracks were removed soon after closure of the segregation center, traces of the physical outlines of red cinder covered streets and housing blocks and remnants of communal facility concrete foundations, such as latrines, bath houses and other buildings, remain in some of the residential blocks, particularly those west of and adjacent to County Road 176 and east of the "M" Canal (Sikes and Arrington 2022:50-51) [emphasis added];

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<sup>2</sup> Sikes and Arrington 2022 text corrected per careful inspection of 1945 WRA map of TLSC.

<sup>3</sup> The actual number of Barracks and other associated buildings based on careful review of the 1945 WRA map. Although the 1945 WRA map shows 84 numbered blocks, seven unnumbered blocks are missing, leaving 77 mapped blocks in the housing area.

[after expansion of the camp as a maximum-security facility in 1944] the eastern portion of the inmate residential area, beyond the “M” Canal [outside the Airport property, FN5, pg. 34], was so far away that it was nicknamed “Alaska” by the incarcerated (Burton and Farrell 2004:5-6).

What we know and what is missing from the Natural Investigations study are:

- (1) *The Barracks and most other structures were removed and the area leveled for the Airport after the TLSC closed in March 1946.* SHPO Roland-Nawi (2013:2-3) observed “While the buildings have been removed, physical evidence of the camp, in the form of foundation remnants, roadway outlines, and garden plots, are evident throughout the APE. ‘This physical evidence shows the property to convey its significance, despite the loss of the buildings’” (Roland-Nawi 2013:2-3)
- (2) It is reasonable to assume that the original ground surface (former lakebed) was fairly level. The grid of ditches surrounding the Barracks were filled in (reportedly with dirt and presumably, human remains, bulldozed from the Japanese American Cemetery) and the area was graded, a process that likely buried and preserved some subterranean structures dug by prisoners below former Barracks;
- (3) Bishop’s (2022) ground-penetrating radar (GPR) study in the eastern portion of the TLSC prisoner housing area indicates most buried pits and cellars are in the upper 1.5-m, or upper ca. 5-ft. Installing the proposed 16,000-ft-long chainlink fence will involve burying 1,600 fenceposts at 10-ft intervals to a depth of 3-ft, for a total of 107 cubic meters of ground disturbance for the Direct APE;
- (4) Needed is an overlay of the WRA 1945 Tule Lake Project Master Plot Plan over the Tulelake Municipal Airport property and proposed fenceline APE, to identify and analyze what unrecorded historic features (e.g., pits, rooms and caches below former Barracks, which totaled approximately 1036) potentially fall within the Direct APE, where fence posts will be buried 3-ft. deep.

### **RECENT GROUND-PENETRATING RADAR STUDY REVEALS BURIED ROOMS**

Most relevant to the Section 106 objectives of adequately identifying historic properties and assessing effects of the proposed undertaking are the 2019-2022 field investigations by Caitlin Bishop leading to discovery of more than 30 buried features, many believed to be cellars, below Barracks dug by prisoners in the “Alaska” residential area at TLSC, in the Indirect APE east of the Airport and “M” Canal, on Bureau of Reclamation land.

Bishop’s field study (2019-2021) focused on the 6-acre area at Block 81 located in the area historically called “Alaska” for its remoteness from the main administration area. Her initial pedestrian field survey in 2019 resulted in identification of multiple surface depressions at Block 81, hypothesized to represent subterranean rooms dug below the floors of Barracks. Based on the 2019 survey results, Block 81 became the target of the 2022 ground-penetrating radar (GPR) fieldwork. Before Bishop’s study, there were no confirmed basements or other underground spaces dug by prisoners at TLSC. Prior archaeological excavations by Jeff Burton (2002) at

Manzanar NHL, coupled with oral history testimony, confirmed that underground spaces (e.g., cellars, basements, underground storage areas) were surreptitiously constructed at World War II Japanese American incarceration centers for various reasons -- as storage places, to create private spaces, to escape the desert heat, or to hide prisoners evading the military police's brutal interrogations.

For Bishop's study, TLSC building footprints (Barracks, Mess Hall, Recreation Building, Latrine, Laundry) at Block 81 were georeferenced using an aerial photo by GPR Specialist Scott Byram (2022), to project the location of former buildings on the modern landscape. Each of the nine GPR survey grids across Block 81 revealed anomalies with layered or non-layered fill and concentrations of buried objects. The majority were identified in the upper 1.5-m (4.92-ft) in Block 81. None were ground-truthed by her study, but remain intact for future investigation. She notes "utilizing GPR is the most accurate way of assessing the site without ground disturbance which could potentially disrupt the integrity of the site and cultural resources within" (Bishop 2022:7).

Bishop and her team successfully referenced historic maps and aerial photos, and applied intensive surface survey in 2019 and GPR technology in 2021 to identify dozens of subsurface anomalies across at TLSC Block 81, including:

- A 20-by-20-ft square Root Cellar beneath the historic location of the Mess Hall and a linear Walkway along the wall of the Mess Hall (both at a depth of 1-m), and cement piers in a line possibly in situ (in Grid 1, former location of Mess Hall and Barracks 1);
- A likely Garden Pond feature consisting of a surface depression and non-local smooth stone, between Barracks 1 and the near red Cinder Road;
- A possible Basement beneath Barracks 1;
- A feature between Barracks 1 and 2, and a rectilinear feature (Cellar?) beneath Barracks 2;
- Two pit features between Barracks 2 and 3;
- Possible Water or Sewerline associated with Latrine on Block 81 (Grid 3);
- Four filled pits beneath former Barracks 3, "likely small basements associated with apartments or individual rooms beneath the barrack itself";
- Possible Concrete Slab Structure in slab-rubble feature (Grid 4);
- Possible subsurface features beneath Barracks 9 (Grid 6);
- Concrete Pier Footings at footprint Barracks 7;
- Filled Pits adjacent to former Barracks 4 and 5, possibly related to its entrance or steps;
- Features were flagged and mapped as they conducted GPR including cement piers, terracotta (Garden features/steps), multiple depressions indicating possible basements or storage areas beneath Barracks 10 and 11, cement walkways, and larger circular garden or pond feature between Barracks 10 and 11 (Grid 5, Barracks 10 and 11; and at Block 81);
- Large Linear Pit feature between Barracks 12 and 13, and two feature Pits associated with Linear Pit under Barrack 13; plus, another 2.5-m squared Pit feature not associated with Linear Pit beneath Barracks 13; plus smaller feature outside but near Barracks 12 (Grid 7);
- Large planar feature likely remains of Recreation Hall (Grid 8);

- Concrete Stairway used to access Barracks 8 on surface, plus Pit feature of similar size as those seen outside Barrack's outline (Grid 9).
- A possible Victory Garden first identified by its blooming plants during prior surface survey conducted in May 2019 (earlier in season than November 2022 GPR fieldwork);
- An abalone shell identified on surface of Block 83 in May 2019 survey;
- Broken ceramics that included teacup with "MADE IN JAPAN" basemark found in looter's pile on red cinder road between Blocks 81 and 83;
- A looter's pit (1-by-1-by-1-ft) in NE corner of Block 82
- Utilities including sewer pipes, water lines, and buried copper wire in buried trenches;
- Pier Footings at Ironing Room located adjacent to former Laundry Room concrete Foundation, plus milled lumber at Block 81 (Bishop suspects most pier footings for former Barracks were removed or displaced when the center was closed, the area bulldozed and abandoned);
- Concrete Steps and Terracotta Bricks located throughout Block 82, inferring common material used to access Barracks and buildings.

Remarkably, the above findings represent only one block among 77 blocks housing 18,000 prisoners at its height, in addition to the Tule Lake Cemetery, Industrial Area, High School, Military Compound, Sewage Treatment Facility, Hospital, Motor Pool, and Administrative areas (Bishop 2022).

Caitlin Bishop is a descendant of Japanese Americans imprisoned at Tule Lake. She completed her Master's degree at California State University at Chico, and during her matriculation, received grant support from the National Park Service (NPS) Japanese American Confinement Sites (JACS) program to conduct this research. Importantly, Bishop had strong support from the greater Japanese American community, was inclusive of multiple agencies, involved former prisoners who were children when they were confined at TLSC, and has begun dissemination of her findings for wider audiences. Bishop had previously worked at the Manzanar NHL with Jeff Burton, who in 2002 led archaeological investigations at Block 8 that identified basements dug out below barracks by the prisoners "to provide privacy or places to hide incarcerated who were evading the military police's brutal interrogations..." and for storage or to escape the brutal heat according to oral history accounts (Bishop 2022:2).

Given the prisoner Barracks on the west side (present Airport property) were built and occupied beginning in May 1942, nearly two years before "Alaska" was constructed and occupied, Takei predicts it may have a higher concentration of underground cellars and storage areas that hid activity and inmates. She found a rare oral history of an inmate who describes avoiding detection during Army sweeps conducted during martial law, by hiding in such rooms. Underground rooms have been reported at other WRA camps, a remarkable example was at the Heart Mountain concentration camp in Wyoming, that had an underground photo studio and lab with running water and electricity. At other WRA camps, multiple underground food storage cellars and hiding spaces used for contraband were common. And as noted above, several such cellars have been excavated at the Manzanar NHS (Burton 2002). Bishop's fieldwork at TLSC has added ten or more possible cellar features identified by GPR at Block 81.

Historic features including subterranean cellars and secret hiding places, or caches dug below Barracks by inmates, plus historic artifacts associated with prisoners are likely to be among the significant unidentified historic archaeological resources that would contribute to the significance of the TLSC TCP, Historic District, and NHL. Such features and artifacts would be significant under NRHP Criterion A for their association with the TLSC, significant under Criterion B for their association with specific persons important in history (e.g., potentially revealed through archival and oral history research), and also Criterion D for their potential to reveal new, more personal information and undocumented trends and circumstances about life among the prisoners through their efforts to conceal activities and objects in underground structures dug underneath Barrack floors.

## **ADVERSE EFFECTS ON TLSC TCP, DISCUSSION AND RECOMMENDATIONS**

“Effect” means alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register 36CFR800.16(i). The Criteria of Adverse Effect at 36 CFR.800.5(a)(1) are:

An 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. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property’s eligibility for the National Register. Adverse effects may include reasonable foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

**DIRECT IMPACTS TO SETTING, FEELING AND ASSOCIATION OF PRISONER HOUSING AREA.** Construction of the proposed 8-ft-tall by 16,000-linear-ft chainlink fence surrounding the Airfield property will have a direct adverse effect on the integrity of setting, feeling and association of the historic TLSC housing area within the TCP, NHL and Historic District from the perspective of the Japanese Americans who view this area as sacred ground, a place where they or their family and friends lived in confinement during the war years. This place plays a significant role in defining who they are as Americans, not only then but now. It is a place for meditation and hopefully, reconciliation with a painful past that most Americans cannot imagine, losing their individual freedoms because of the shape of their face in a time of mass hysteria.

The proposed fence imposes a new barrier reminiscent of, and on the northern edge near the same location as, the original fence that confined the prisoners to the TLSC. Currently, the former TLSC housing area on the Airfield property has relatively unrestricted views of the landscape when standing on the Airport’s surrounding access roads (Modoc 176, -113, -113A, and Sixth Avenue), close to where the proposed fence will be located, and looking across the

former prisoner housing area from the north, east, south and west sides, The road grid outlining camp features is still discernable (in red cinders) in some places (unrecorded historical resources), and it is not too difficult to imagine row upon row, in orderly military style, of residential Blocks with their assigned Barracks, Mess Halls, Recreation Buildings and Laundries.

Important landmarks rising above the low-lying landscape, covered in desert sage and rabbit brush, are Abalone Mountain to the east and the Peninsula to the south, Their views from the Airport and former housing area are nearly pristine and unfettered. The new fence would define ‘inside’ (restricted) and ‘outside’ (free or open) space, these important landmarks to be outside the fence.

Installing “an informational sign at the entrance to the Airport,” to include “general factual information regarding the TLSC” to “further resolve the adverse effect... on the surviving 2,640-ft segment of the original TLSC security fence,” fails to make the connection between the historical resources on the airport property and the audience (Japanese Americans and others) who want to better comprehend this tragic history and connection to place. Putting an informational sign about the TLSC at the proposed Airport entrance, where the new fence is proposed, could be confused that the new fence is the original, and is rather like history repeating itself, but this time keeping people out.

## **RESTRICTION ON ACCESS.**

Today, thousands of visitors spanning from wartime incarceration survivors, Japanese American descendants, international tourists, and fellow Americans visit Japanese American Incarceration sites. While at Manzanar, I had the incredible opportunity to accompany several families to the barrack sites where their grandparents, or parents once lived. Having open access to these sites is imperative to healing and conveying to the public why these places are so meaningful. An airport fence would not only hinder access to these areas and create logistical hinderances during pilgrimage but their physical presence, keeping those in or out is a jarring reminder of the fences that historically stood.

At Tule Lake Segregation Center site, much of the original acreage was divided amongst private landowners, federal agencies, and industry since the end of the war. This fractioning has created barriers to access for members of the descendant community to visit, reflect, and grieve. And yet, years of pilgrimages that host religious ceremonies, site tours, and community discussions with elders have persisted, further proving what a detrimental loss it would be to lose the intangible heritage one feels when on the landscape.

(Caitlin Bishop, 2/9/23)



Japanese Americans and others visiting this nationally significant civil rights site want the freedom to access this area (as they have at Manzanar NHL), to find specific Blocks still outlined on the ground, to connect with family and ghosts of the past. Survivors of incarceration and their descendants, as well as members of the public, are restricted from accessing the site because two-thirds of the housing area where over 24,000 were imprisoned is now used as an airfield, making visitor access unwelcome.

It is not sufficient to propose that Modoc County (airport sponsor) will arrange for group visits or tours on the Airport property by organized groups or organizations (Sikes and Arrington 2022:65), as it is the personal or extended family experience on the ground that matters most.

**DIRECT IMPACTS TO UNIDENTIFIED ARCHAEOLOGICAL RESOURCES.** It is highly likely the proposed fence will directly impact untold buried archaeological features and artifacts in the former housing area like those revealed through careful surface survey and GPR by Caitlin Bishop (2022) in the “Alaska” area east of the Airport, at Manzanar (Burton 2002) and elsewhere. Rooms dug beneath Barracks were used to secret away personal items, create privacy where there was none, hide from police or other reasons. These historic properties were not adequately considered and identified by Sikes and Arrington (2022), or by previous researchers (Jensen 2010; Sikes et al. 2017), and the fence project’s proposed excavation of 1,600 fenceposts to a depth of 3-ft, for a total amount of ground-disturbance of 107-cu-m, is expected to directly impact the integrity of untold features potentially significant under NRHP Criterion D. These unidentified archaeological features are likely contributing to the significance of not only the TLSC TCP, but the NHL and Historic District.

It is NOT appropriate to suggest that archaeological monitoring of construction will adequately mitigate related impacts by treating inadvertent (post-review) discoveries. Sikes and Arrington’s (2022:65) proposed “Cultural Resources Monitoring Program” offers a canned boilerplate approach that fails to consider the opinions of the descendent communit(ies) when evaluating the significance of and carrying out data recovery excavations if avoidance is infeasible. It does not identify what types of historic properties may be encountered and how the plan will avoid such resources. An Historic Properties Treatment Plan (HPTP) may be the type of document to provide sufficient detail, but is not included by Sikes and Arrington (2022).

**POSSIBILITY OF FINDING DISINTERRED HUMAN REMAINS FROM TLSC CEMETERY.** There is a possibility that disinterred remains of Japanese Americans buried in the TLSC Cemetery may be present on Airport property, having been dug up for use to fill ditches by local homesteaders. The TLSC Cemetery established by Japanese Americans during the War years is located at the southeast corner of the Indirect APE and accessed by 6<sup>th</sup> Avenue, across the road from the Modoc County’s public dump site. At a November 2007 onsite teacher’s workshop, a Japanese American survivor spoke to the group wondering aloud why there was a great hole where the Cemetery site was formerly located. A local homesteader on the tour bus

volunteered his experience, describing himself and other homesteaders bulldozing the site, using the cemetery earth to fill the grid of drainage ditches *surrounding the blocks and barracks*. “We liked the gravelly texture of the dirt,” he explained (Barbara Takei, pers. comm.). The legal process for handling such an inadvertent discovery would not be the same as the laws governing Native American remains on fee lands in California, which is what Sikes and Arrington (2022:65) cite.

**LONG-TERM CUMULATIVE IMPACTS TO TLSC TCP.** The proposed 16,000-ft-long fence around the Airfield is proposed as an “improvement” to provide security to the property and to prevent wildlife such as deer from interfering with plane traffic on the runway. It is reasonable to expect that with this improvement there may be expansion of services provided by this small, rural airport, used mostly for “crop dusting,” or application of fungicidal or insecticidal chemicals sprayed from a small plane. Given the environmental trends banning such products, alternate ways to treat crops with fertilizers and pesticides may be on the horizon<sup>4</sup> and the Airfield would no longer have a viable purpose. It is not used for passenger traffic.

Future Airfield developments across the former TLSC prisoner housing area, such as roads, runways, buildings, hangars, warehouses and the like will continue to diminish the integrity of setting, feeling and association of the former housing area, and also directly impact the extant WWII road grid and subsurface historic features. These are reasonably foreseeable cumulative impacts from future developments if the Airfield is improved with a security fence and continues to operate at this location. Better to relocate the Airport and begin the process with a Feasibility Study now.

## **MEASURES TO RESOLVE ADVERSE EFFECTS ON TLSC TCP**

**NO FENCE, FEASIBILITY STUDY TO RELOCATE AIRPORT.** These comments opened with reporting on the more than 50,000 persons who signed petitions urging the lead agencies (FAA and Modoc County) not build the fence, and to move the Airport to a less sensitive location and stop the desecration of this American civil rights site, a place that tells the story of Japanese American protest to the unjust WWII incarceration.

Preservation efforts for the Tulelake Airfield should begin with the FAA conducting a feasibility study, to identify other more appropriate sites for the airfield’s operation. Such a study can examine the regulatory burden and financial costs to remedy the unconscionable decision to put an airfield in the middle of an historic concentration camp site. Such a heinous decision -- made

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<sup>4</sup> See <https://beyondpesticides.org/dailynewsblog/2022/06/california-court-bans-state-run-pesticide-spraying-for-failure-to-consider-adverse-impacts/>.

during an era when white supremacy and Jim Crow racism were the law of the land -- need not be perpetuated.

**CONSERVATION EASEMENT FOR CEMETERY.** While the Cemetery is outside the Direct APE of the proposed Airfield fence, it would be a show of good faith for the landowner(s) to convey the property in a conservation easement to a Japanese American organization for purposes of long-term protection and management. Capping the site may be prudent to avoid or minimize further disturbance. Closing and relocating the nearby Modoc County Dump would be a respectful gesture.

**MEASURES TO AVOID OR MINIMIZE VANDALISM.** Mod-113, -113A connect to the current Modoc County dump and the former TLSC dump and sewage treatment plant. Evidence of illicit digging and collecting of artifacts associated with the TLSC prisoners, plus modern dumping of large appliances and rubbish along Mod-113, has been reported and noted by locals (Bishop 2022:4, 7; Nick Macy, pers. Comm. to Bishop 11/5/21). There are no gates to restrict access along these rural agricultural roads.

Modoc County manages the dump and roads around the Airport. Periodic monitoring by law enforcement and others affiliated with Modoc County and Federal agencies (NPS, BOR) and local organizations (TLC, historical societies) might be organized to discourage looting. Installing gates may also be considered.

## **OTHER COMMENTS**

### **MODOC TULE LAKE TRADITIONAL CULTURAL PROPERTY (TCP)**

The discussion of (no) adverse effects on the proposed Modoc Tule Lake TCP is difficult to digest since as 36CFR800.5(a)(1) instructs: “the characteristics that qualify this place as a historic property... and may diminish the integrity of its location, setting, materials, workmanship, feeling, or association,” have not been adequately articulated in this Supplemental Report (Sikes and Arrington 2022:25-31, 61, 64). The authors fail to identify what type of property this TCP is, i.e., a district, site, building, structure or object (NPS 2022:10).

The present authors sincerely recognize and respect the historical and cultural connection of Modoc descendants to “the larger character of the landscape in the Tule Lake Basin” that retains views of prominent sacred places and geologic features, as Sikes and Arrington (2022:26) characterize the proposed general area of the proposed TCP. However, there is insufficient detail about those characteristics and examples of specific archaeological sites, viewsheds and other features, that arguably have adequate integrity of location, design, materials, setting, feeling and association, many of which most certainly do, but the TCP proposal is too broad and ill-defined.

Their reliance on Douglas Deur's (2008) ethnographic study, *In the Footprints of Gmukams* for the NPS, is important in that he consulted with living Modoc descendants about their relationship and connections to their ancestral homeland.

Deur (2008) was apparently unfamiliar with the fact that the whole of Lava Beds National Monument (LBNM, or LABE) was officially listed on the NRHP on March 21, 1991, by the NPS.<sup>5</sup>

Some of the Modoc elders interviewed for that [Deur's 2008) study 'expressed an interest in seeing all or part of the Monument [LBNM] designated as a TCP, but there 'was no clear consensus of the exact configuration of a TCP' (Deur 2008:254)... Further investigation of the boundaries of a TCP at LBNM was tabled at that time, and has apparently not been revisited. (Sikes and Arrington 2022:29)

Most importantly, Eidsness and Smith (1991) highlighted the entire LABE Archaeological District,

... holds traditional cultural significance for contemporary Modoc, who are now primarily affiliated with the Klamath Tribe of Oregon and the Modoc Tribe of Oklahoma. Because of its integrity of location, setting, feeling and association, Modoc War history and public accessibility, the District presently serves the Modoc as the most tangible link with their ethnic heritage. With the significant population decline and cultural disruption after historic contact, followed by their dispersal after the war of 1872-73, the Modoc had lost much knowledge about their heritage. Today there is a revitalized interest among the Modoc about their traditional culture, and the Modoc Lava Beds District serves as one of the foci of this interest. Certain archeological sites within the District are identified by contemporary Modoc consultants as having traditional cultural significance. Presently, a Modoc religious leader affiliated with the Klamath Tribe regularly prepares himself for traditional ceremonies by visiting Captain Jack's Stronghold (Patty Hunt 1989:PC). In August 1990, a "return to the Stronghold" ceremony is planned by local Modoc descendants. During the Modoc War of 1872-73, the Modoc religious leader Curley Headed Doctor performed a number of ceremonies at the Stronghold in preparation for battle (Murray 1959:117-118). In 1988 when a reburial location for Native American skeletal remains held in the Lava Beds National Monument collections was being decided upon, Modoc representatives from Oklahoma and Oregon preferred that the reinterment occur near Captain Jack's Stronghold. In addition, the National Park Service has been approached informally by the Klamath Tribe about future reburial within the Monument of Native American remains from Modoc territory sites. (Eidsness and Smith 1990:Section 8, Page 2)

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<sup>5</sup> Historic properties listed on the National Register of Historic Places are automatically included on the California Register of Historical Resources.

TCP values of the Lava Beds Archaeological District to contemporary Modoc are highlighted, in conformance with Guidance written by Parker and King (1990, revised 1992, 1998; 2022) and first released by the NPS in 1990, in the same year as this nomination was penned by Eidsness and Smith (1990). The NRHP nomination for LABE is a highly relevant reference that was apparently overlooked by Deur (2008), by Sikes and Arrington (2022) and by the NPS (2018) in their management plan. The nomination should have been revealed in a formal record search at the Northeast Information Center (NEIC) of the California Historical Resources Information System (CHRIS), or California Office of Historic Preservation (COHP), or the NPS at LABE. Such research is a common required element of such studies as Sikes and Arrington's, and it would have been important that their search area was broad enough beyond the Newell area to include LABE, especially since it is often referenced in their report.

### **COMMENTS ON ABSTRACT**

To be a fair and balanced introduction, where mention of importance of Tule Lake Area to Modoc people, we believe it is important to add a brief statement about the significance of TLSC to Japanese American communities as a TCP.

Substantively, the Abstract needs to be rewritten based on addressing the inadequacies of the report detailed herein.

### **COMMENTS ON DEFINING THE DIRECT AREA OF POTENTIAL EFFECTS (APE)**

The Direct APE for the undertaking is described as the route of the proposed Airport perimeter fence line, that is 16,000-ft-long (perimeter fence length) by 3-ft-deep (maximum depth ground disturbance for fence postholes) by 40-ft-wide (centered on the new fence line), for a total area of 13.9 acres (question if this figure conflicts with Figure 3 notation of 15-acres?). With fence posts set 10-ft-apart, a total of 1,600 postholes will be dug using a truck-mounted posthole digger to 3-ft maximum depth by 1-ft-wide (circular hole). The total amount of ground disturbance associated directly with fence construction was not calculated by Sikes and Arrington, but totals a whopping **107 cubic meters (3768 cubic feet)**.

This substantial amount of ground disturbance is relevant to discussion about the potential for proposed fence construction to adversely impact the data potentials of as-yet unidentified archaeological features dug by prisoners below their Barrack's floors for storage, personal space, to escape the heat, or hiding places.

Construction and equipment access to the Direct APE, plus any staging and equipment storage areas (e.g., for 1,600 fence posts, 16,000-ft of chain link fence) have not been addressed, mapped and the areas and depths of anticipated ground disturbance reported as part of the Direct APE.

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## DAY OF REMEMBRANCE OF JAPANESE AMERICAN INCARCERATION DURING WORLD WAR II

BY THE PRESIDENT OF THE UNITED STATES OF AMERICA

### A PROCLAMATION

Eighty years ago, on February 19, 1942, President Franklin D. Roosevelt signed Executive Order 9066, stripping people of Japanese descent of their civil rights. That order and the subsequent actions carried out by the Federal Government represent one of the most shameful chapters in our Nation's history. On this Day of Remembrance of Japanese American Incarceration During World War II, we acknowledge the unjust incarceration of some 120,000 Japanese Americans, approximately two-thirds of whom were born in the United States.

Despite never being charged with a crime, and without due process, Japanese Americans were forcibly removed from their homes and communities and incarcerated, simply because of their heritage. For years, many Japanese Americans lived in harsh, overcrowded conditions, surrounded by barbed wire fences and armed guards. Not only did they lose their homes, businesses, property, and savings—they also lost their liberty, security, and the fundamental freedoms that belong to all Americans in equal measure.

I have always believed that great nations do not ignore their most painful moments—they confront them with honesty and, in doing so, learn from them and grow stronger as a result. The incarceration of Japanese Americans 80 years ago is a reminder to us today of the tragic consequences we invite when we allow racism, fear, and xenophobia to fester.

Today, we reaffirm the Federal Government's formal apology to Japanese Americans whose lives were irreparably harmed during this dark period of our history, and we solemnly reflect on our collective moral responsibility to ensure that our Nation never again engages in such un-American acts. We acknowledge the intergenerational trauma and loss that the incarceration of Japanese Americans has caused. We also uplift the courage and resilience of brave Japanese Americans who, despite being unjustly incarcerated, formed powerful communities and marshalled incredible dignity and strength.

Many of those whose families were incarcerated volunteered or were drafted to serve in combat—courageously serving in the 100th Infantry Battalion, Military Intelligence Service, Women's Army Auxiliary Corps, Army Nurse Corps, and the 442nd Regimental Combat Team with unwavering patriotism. The all-Japanese American 100th Infantry Battalion and the 442nd Regimental Combat Team became two of the most decorated and distinguished military units in our Nation's history. Countless Japanese Americans carry forward this legacy of extraordinary service today, and their work to preserve the history of this period strengthens our Nation and our democracy.

We reflect on the bravery of civil rights leaders like Fred Korematsu, Minoru Yasui, Gordon Hirabayashi, and Mitsuye Endo, and that of every Japanese American who organized and sought redress. Their efforts helped bring about the first Day of Remembrance, led President Jimmy Carter to sign the law creating the Commission on Wartime Relocation and Internment of Civilians, and spurred President Ronald Reagan to sign the Civil Liberties Act of 1988, which provided monetary reparations to living survivors and an official apology to the Japanese American community. At the same time, we also acknowledge the painful reality that Japanese Latin Americans, who were taken from their Central and South American homes and incarcerated by the United States Government during World War II, were excluded from the Civil Liberties Act of 1988.

Today, the National Park Service helps preserve several Japanese American incarceration camps. These tangible reminders of our history provide important spaces for reflection and learning about the injustices born of prejudice. Preserving incarceration sites as national parks and historic landmarks is proof of our Nation's commitment to facing the wrongs of our past, to healing the pain still felt by survivors

and their descendants, and to ensuring that we always remember why it matters that we never stop fighting for equality and justice for all. My Administration is committed to maintaining these national parks and landmarks for future generations and to combating xenophobia, hate, and intolerance—including through the reestablished White House Initiative on Asian Americans, Native Hawaiians, and Pacific Islanders. In the words of Dr. Frank Kitamoto, who was incarcerated as a child, “This is not just a Japanese American story but an American story with implications for the world.”

The words we use to describe the historical and present treatment of communities of color and other underserved communities have profound meaning. Today, we recognize that euphemistic terms that we have collectively used in the past—such as “assembly centers,” “relocation,” or “internment”—do not adequately describe the injustice experienced by some 120,000 people; we recognize the forced removal and mass incarceration of Japanese Americans and others during World War II; and we reaffirm our commitment to *Nidoto Nai Yoni*, which translates to “Let It Not Happen Again.”

NOW, THEREFORE, I, JOSEPH R. BIDEN JR., President of the United States of America, by virtue of the authority vested in me by the Constitution and the laws of the United States, do hereby proclaim February 19, 2022, as a Day of Remembrance of Japanese American Incarceration During World War II. I call upon the people of the United States to commemorate this injustice against civil liberties and civil rights during World War II; to honor the sacrifice of those who defended the democratic ideals of this Nation; and to commit together to eradicate systemic racism to heal generational trauma in our communities.

IN WITNESS WHEREOF, I have hereunto set my hand this eighteenth day of February, in the year of our Lord two thousand twenty-two, and of the Independence of the United States of America the two hundred and forty-sixth.

A handwritten signature in black ink, appearing to read "J. R. Biden Jr.", is written in a cursive style. The signature is positioned in the lower center of the page, below the text of the proclamation.