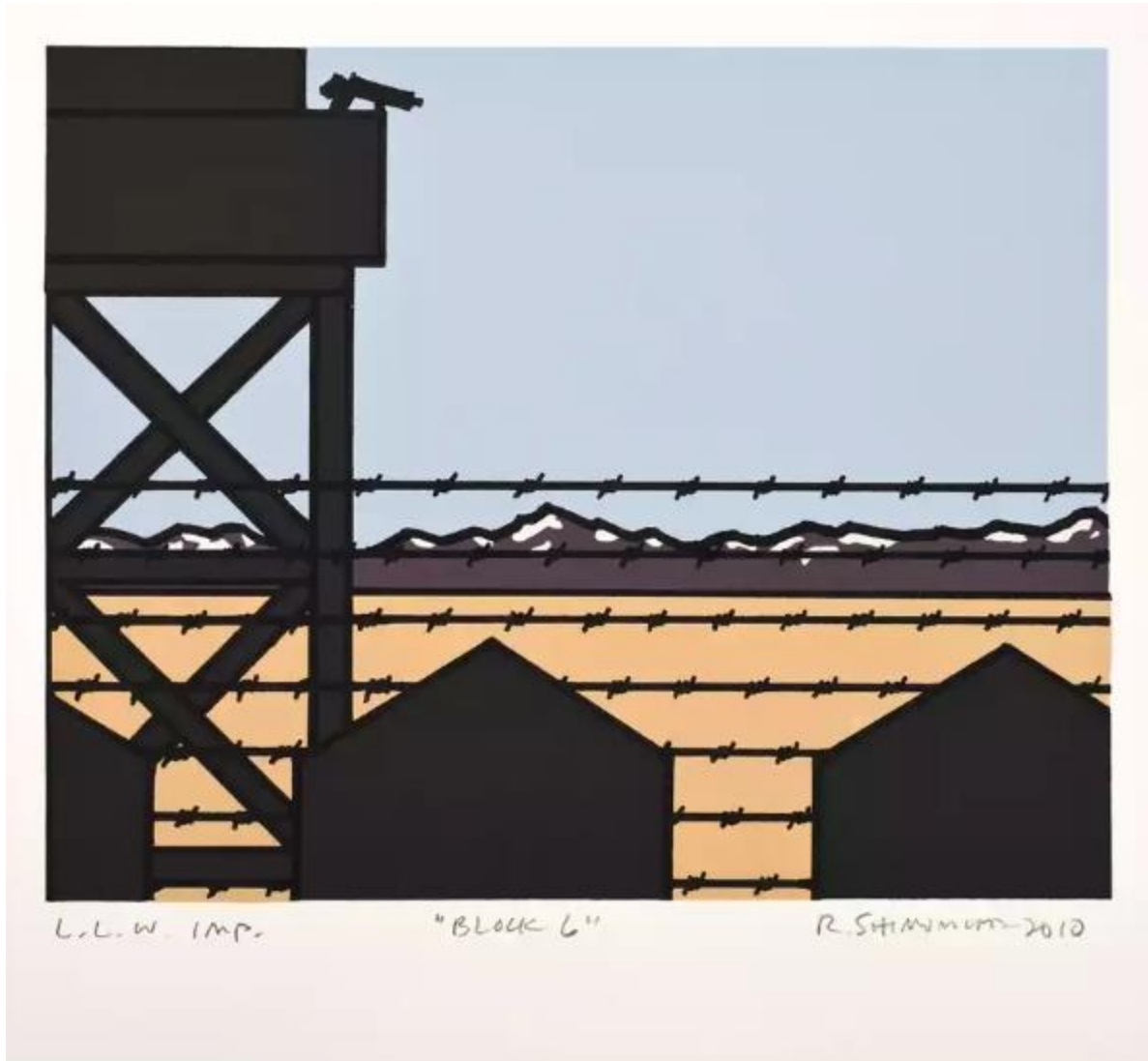


A Landscape of Isolation:

A Traditional Cultural Property Study of the Minidoka Concentration Camp and its Viewsheds in Jerome, Lincoln, Blaine, and Minidoka Counties, Idaho, with Recommendations as to their Eligibility for Listing in the National Register of Historic Places



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MINIDOKA

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Cover image: "Block 6" Roger Shimomora color lithograph depicting viewshed looking north to the Pioneer Mountain range through the barbed wire fencing at Minidoka.

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“Day break finally came and with it a strange new country. Instead of seeing beautiful mountains as we did the day before, the scenery had changed to the barren desert full of sagebrush” – Tom Fukuyama, survivor of the Minidoka Concentration Camp

1.0 Introduction

Algonquin Consultants, Inc. (Algonquin) is pleased to present the results of an ethnographic study of the Minidoka Concentration Camp (Minidoka), including its surrounding viewsheds. This report was prepared at the request of the Friends of Minidoka (Friends) to document the cultural significance of the property to the Japanese American community in language relevant to the National Register of Historic Places (NRHP). We conclude that Minidoka is eligible for the NRHP as a traditional cultural place/property (TCP)¹.

Algonquin completed several interrelated Study activities to document Minidoka (see Figure 1, Figure 2, Figure 3, and Figure 4) as a TCP of significance to the Japanese American descendant community. Algonquin reviewed historic records, testimonies, and accounts, engaged and consulted with Minidoka descendants to document the ongoing significance of the place, developed maps of the proposed TCP, and assessed the property’s eligibility for listing in the NRHP. These interrelated study activities are described in more detail below:

1) Literature Review

Algonquin reviewed and synthesized in-hand historical, ethnographic, and other source material (e.g., interviews, archival documents, oral histories, etc.), publications and unpublished diaries, texts, Japanese American community accounts and testimonies, and various other documents, as available, as well as any other additional materials provided by Friends to describe the historic significance and integrity of the Minidoka concentration camp and surrounding area.

2) ArcGIS Mapping

Algonquin used the collected information from the literature review to develop a map of the Minidoka TCP boundary using ArcGIS software. Information for the maps was provided by Friends. The TCP map created for the Study displays the boundary in part delineated using viewshed analysis; this viewshed analysis, along with other ethnographic source material helps to justify the full extent of the Minidoka Concentration Camp TCP.

¹ A portion of the Minidoka camp site is included in the NRHP as a “National Historic Site” (See Minidoka National Historic Site (U.S. National Park Service) (nps.gov)). But the NRHP status of the remainder, and of the viewsheds “outside the fence” remains undefined.

3) TCP Study Report

After completing the literature review, Algonquin synthesized all collected historical information to contextualize Minidoka as a TCP. The Friends of Minidoka assert that the Minidoka TCP includes the Minidoka Relocation Center's historic footprint, the Minidoka National Historic Site and the viewsheds stretching out from its boundaries, including the landscapes that dominated the internees' visual environment. Algonquin's documentation and reporting effort explored whether the area fits the definition of a TCP outlined in NRHP Bulletin 38², and whether it meets the National Park Service's criteria for inclusion in the NRHP.



Figure 1: Sites in the Western U.S. associated with the forcible relocation of Japanese Americans During World War II. The Minidoka Concentration Camp (indicated by the red arrow) resides in southern Idaho. Courtesy of Friends of Minidoka, <https://www.minidoka.org/relocation-center-map>.

Nomination of the Minidoka property for formal listing in the NRHP is outside the scope of this study. A nomination for listing in the NRHP would be a separate effort that specifically assesses the characteristics, significance, and integrity of the property, demarcates a clear property

² National Register Bulletin 38 (Parker and King 1998:1) provide the following definition of a TCP: a property that is "eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that (1) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community."

boundary, and presents this information on the National Park Service's *National Register of Historic Places 10-900* nomination form. It would be a substantial, costly undertaking.

This report is written to inform a nomination if such steps are taken. It is also written to facilitate coordination with the Idaho State Historic Preservation Office (SHPO) and Keeper of the NRHP in their determination of eligibility (DOE) for the NRHP. Listing in the NRHP can be complicated, time consuming, and expensive, and is not necessary to trigger the review of project effects because Section 106 of the NHPA applies equally to listed and non-listed eligible places. Eligibility is determined following Section 800.4(c)(2) of the ACHP's Section 106 regulations as well as 36 CFR 60.4, and is a responsibility of the lead federal agency, in this case, the BLM, often in coordination with the SHPO.

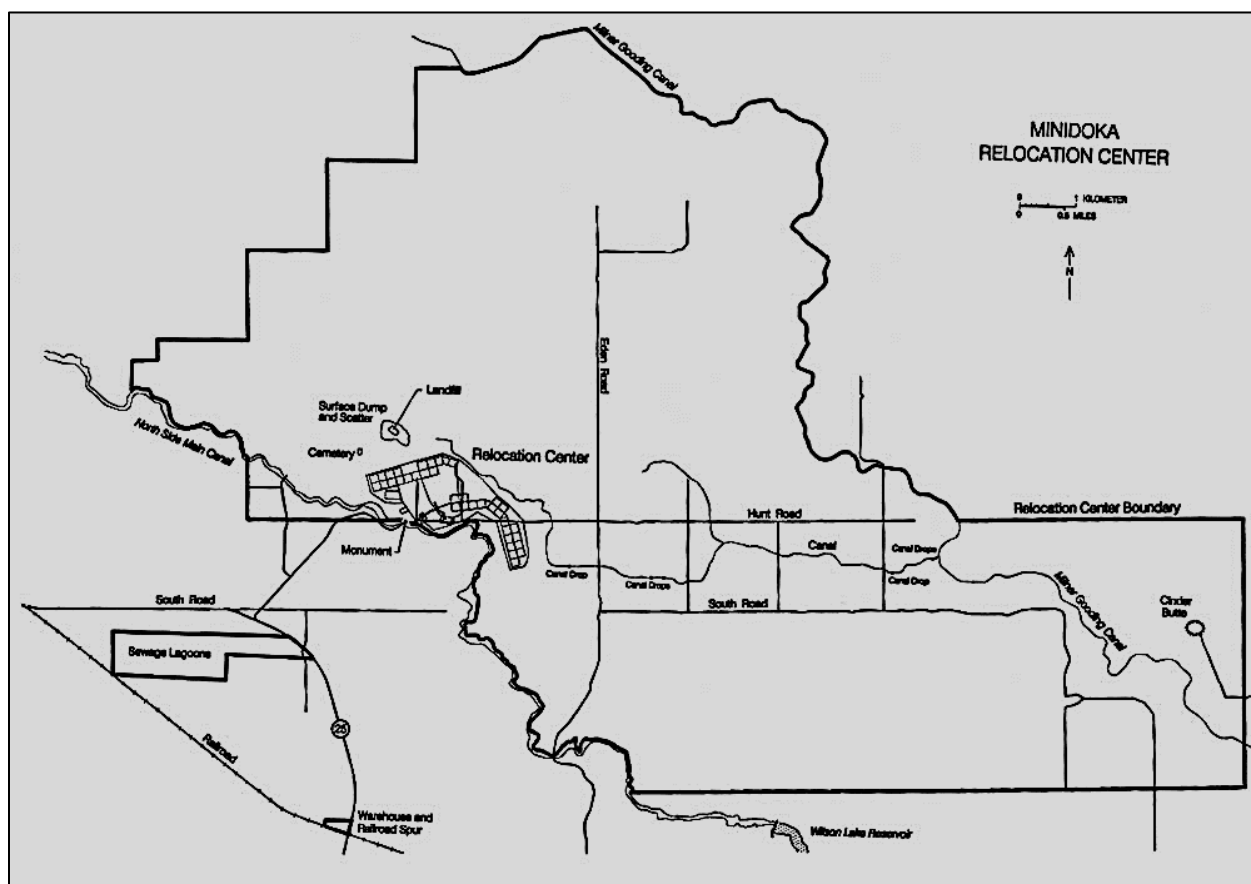


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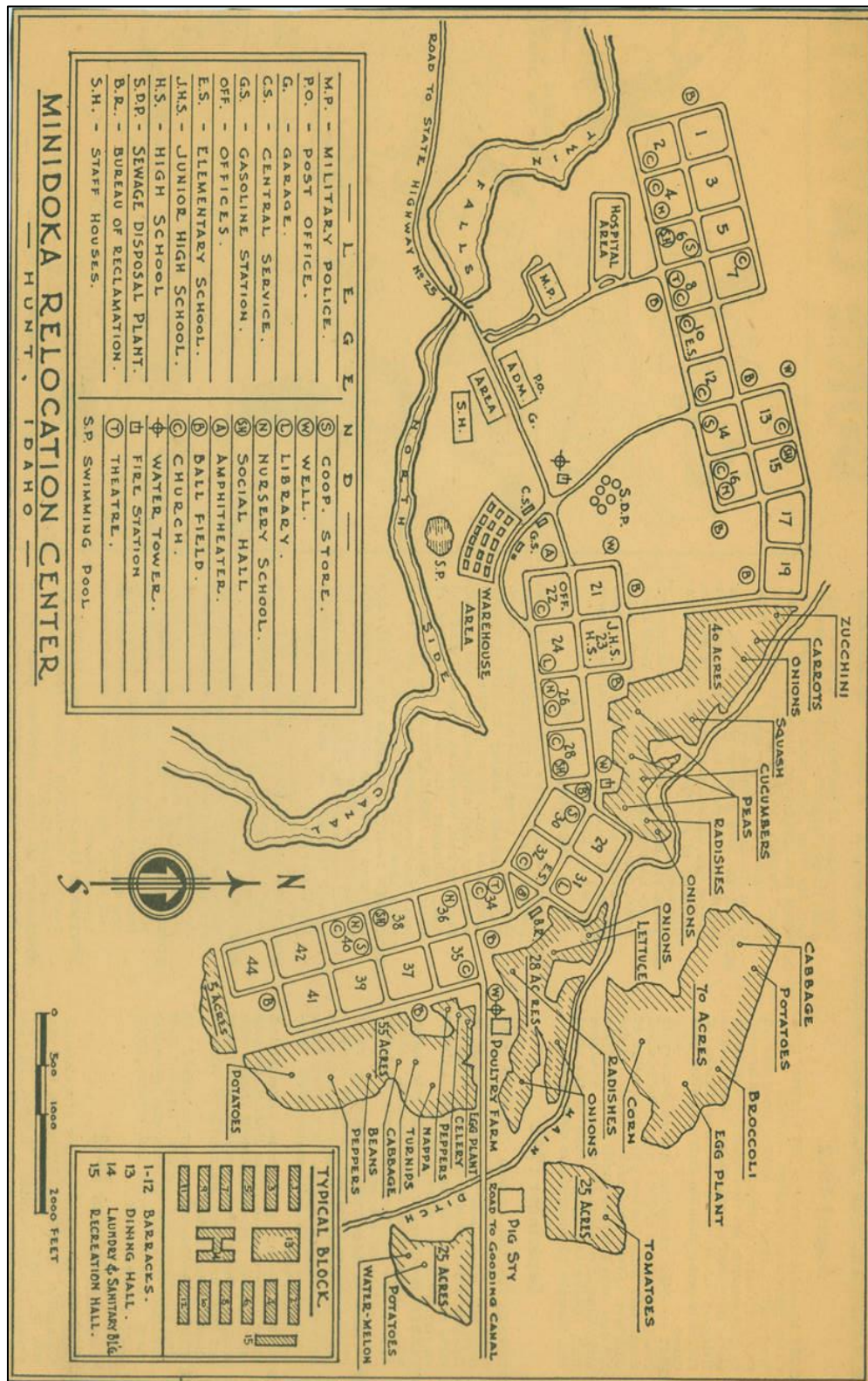


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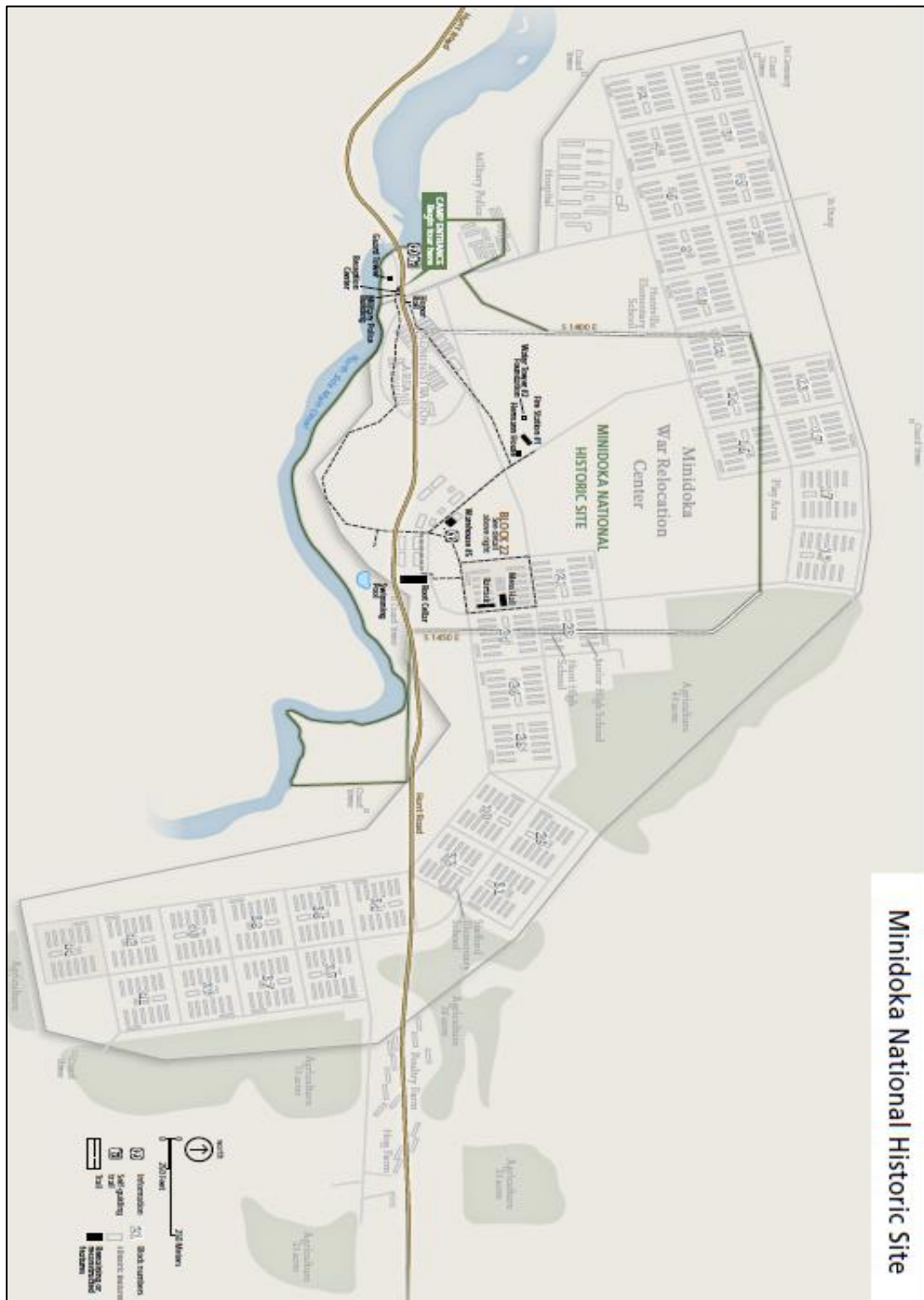


Figure 4: Minidoka Internment National Monument was established by Presidential Proclamation via President Clinton using his authority under the Antiquities Act on January 17, 2001. The map shown is the Park boundary as authorized by Act of Congress in 2008, and as modified by a minor boundary expansion.

2.0 The National Historic Preservation Act, Section 106, and TCPs

Federal undertakings and other development projects can affect valued historic, cultural, and archaeological properties, collectively known as historic properties/places. Recognizing the impacts federal government actions may have upon such places, Congress enacted the National Historic Preservation Act (54 U.S.C. 300101 et seq.) in 1966. Section 106 requires federal agencies to take into account the effects their actions may have upon historic properties. The Advisory Council on Historic Preservation, established by the NHPA, issued regulations to implement and guide the historic property identification and evaluation process. In following these regulations, a federal agency – in consultation with Tribes, THPOs, State Historic Preservation Officers (SHPOs), and other interested parties – identifies historic properties that may be affected by its actions, evaluates them as needed, determines whether and how they will be affected, and seeks to resolve any effects that are adverse.

“Historic properties” under the National Historic Preservation Act and its implementing regulations are defined as “districts, sites, buildings, structures, and objects significant in American history, architecture, archaeology, engineering, and culture” (54 U.S.C. 302101). Any such property is eligible for listing in the NRHP; potential impacts on such places must be considered under Section 106. Moreover, Section 101(6)(d) of the National Historic Preservation Act makes clear that historic properties “of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization may be determined to be eligible for inclusion on the National Register” (54 U.S.C. 302706(a)).

Although TCPs have been found eligible for the NRHP since its inception, questions arising about them in the late 1980s resulted first in issuance of National Park Service guidance in 1990 (Parker and King 1998) and then in the 1992 addition of Section 101(d)(6) to the National Historic Preservation Act (54 U.S.C. 302706)³.

National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties (Parker and King 1998) outlines ways to identify and describe a TCP. Such a place is significant because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community (Parker and King 1998:1). TCPs draw upon a community's traditions, defined as the

...beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice. The traditional cultural significance of a historic property, then, is significance derived from the role the property plays in a community's historically rooted beliefs, customs, and practices (Parker and King 1998:2).

The boundaries of a TCP are often defined rather arbitrarily to satisfy what are taken to be administrative and recordkeeping requirements. As a result, places located outside a defined TCP

³ For a discussion of the history of both Bulletin 38 and the 1992 NHPA amendments, see King 2003:25–40.

boundary are often intrinsically connected to places located within it. Taken holistically, cultural elements found inside as well as outside of bounded TCPs are often viewed as parts of “traditional cultural landscapes”, (which themselves, may be eligible for the NRHP). The significance of a traditional place does not simply end once its defined boundary is crossed. Thus, creating a boundary around a TCP may not be helpful to understanding and evaluating the effects that an undertaking may have upon it, and may obscure effects on the cultural landscapes to which it contributes. While the delineation of a boundary for a TCP may be a necessary function of the formal rigidity of the NRHP nomination process, it is not necessarily required for determination of eligibility made within a Section 106 process (King 2002:117-118). Further discussion of boundaries as they pertain to the Minidoka property may be found in subsection 3.6.

Algonquin’s study sought to address two questions in sequence:

1. Does the Minidoka property appear to be a TCP as defined in National Register Bulletin 38; and
2. If so, does the Minidoka property appear to be eligible for listing in the National Register, with reference to any of the four criteria of eligibility as outlined in 36 CFR 60.4 (a, b, c, d)?

Note that a determination of NRHP-eligibility does not necessitate that any specific actions need to be taken to manage a place. A determination of eligibility does not give a site or area any particular or special protections, nor does it affect land ownership in any way. A determination of eligibility simply means that project’s effects on the place must be taken into account in accordance with the consultative procedures set forth in the Advisory Council on Historic Preservation’s Section 106 regulations (36 CFR 800.5).

3.0 The Minidoka Concentration Camp – Traditional Cultural Property Evaluation

This section presents the study’s overall findings regarding whether or not Minidoka meets the definition of a TCP as defined in National Register Bulletin 38. We then turn to defining any contributing and non-contributing elements that may be associated with the property, as reported by historical primary sources and descendants of those incarcerated at Minidoka. This section is then followed by an assessment as to whether Algonquin thinks the Minidoka property is eligible for listing in the NRHP, using the four-step process outlined in *National Register Bulletin 38* (Parker and King 1998).

3.1 Landscape Approach

To be considered a TCP, a place must be associated with the “cultural practices or beliefs of a living community that (a) are rooted in that community’s history and (b) are important in maintaining the continuing cultural identity of the community” (Parker and King 1998:1). To determine if Minidoka is reasonably viewed as a TCP, we reviewed published and unpublished documents, primary sources, and the contents of oral history interviews to assess both the historical significance of Minidoka and its ongoing importance among survivors and descendants.

We concluded that the Minidoka property would be best evaluated from a “traditional cultural landscape” standpoint, incorporating not only the concentration camp itself, but the important

surrounding viewsheds that are inseparably tied to the facility by the perceptions of inmates in the past and visitors today. Below, we offer some background information about the concepts of cultural landscapes, and provide a working definition of this term grounded in the current academic literature.

A “cultural landscape” can encompass a broad range of human activities and interactions. Cultural landscapes include, but are certainly not limited to: (1) holy landscapes, (2) storyscapes, (3) regional landscapes, (4) ecoscapes, and (5) landmarks (Stoffle et al. 1997:234). The National Park Service defines a cultural landscape as a “geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person, or that exhibit other cultural or aesthetic values” (Page et al. 1998:12). The National Park Service views cultural landscapes as places that can be eligible for inclusion in the NRHP (Evans et al. 2001:53).

In recent years, the National Park Service (NPS), in recognition of the importance of cultural landscapes, has published documents to help identify, record, and ultimately manage them. *A Guide to Cultural Landscape Reports: Contents, Process, and Techniques* (Page et al. 1998:53), for example, introduced the characteristics and features of a cultural landscape, which include: natural systems and features, spatial organization and land use, cultural traditions, cluster arrangement, buildings, views and vistas, topography, vegetation, circulation (trails, roads, canals, etc.), water features, and structures and other objects, small scale features, and archaeological sites. Although useful, their concept of a cultural landscape over-emphasizes the built environment, is temporally static, and fails to focus on the traditional belief systems, cultural practices, and intangible elements that give a place value in the eyes of a living community.

Ethnographic landscapes, a concept and term that has been challenged (see Hoffman and Mills 2020; King 2013), may simply be a more refined type of cultural landscape (Page et al. 1998:53), contain “a variety of natural and cultural resources that associated people define as heritage resources ... Small plant communities, animals, subsistence grounds, and ceremonial grounds are included” (Page et al. 1998:12). An ethnographic landscape is identified and defined via the cultural groups who ascribe value and meaning to it (Evans et al. 2001). Therefore, the idea of an “ethnographic landscape” focuses on an area’s past, present, and future value to a living community, its range of uses, and the overall human-nature interrelationship (Page et al. 1998:28–29; Stoffle et al. 1997:233).

Put plainly, such landscapes are areas “that have been given special and specific cultural and social meaning by people associated with them” (Evans et al. 2001:53). This concept recognizes that, as those uses change, the landscape alters accordingly; current uses will grow out of past relations between humans and “the land.” Predominantly, cultural landscapes reflect the relationship between culture and place, one that is never static; it is a relationship where culture is shaped by place, and place, in turn, is shaped by culture. As Darby and Burney defined it: “Cultural landscapes can be viewed as analogous with ecosystems: an inseparable single unit of an ecological community with its physical environment” (see also Horton 2004 and Sauer 2007 for parallel definitions of traditional cultural landscapes). In a presentation given in 2016, the Native American Rights Fund defines traditional cultural landscape as:

...an area, viewed from the Native perspective, that is part of their Indigenous use and occupancy areas, contemplates the relationship of the people to the land, and takes into consideration all of these other elements: the spiritual elements; the use and occupancy of the resources there; the reliance upon the fish. It is a much more holistic view [Native American Rights Fund, Indigenous Environmental Stewardship – NARF 45th Anniversary CLE at 32:12 to 32:52, YouTube.com, <https://www.youtube.com/watch?v=4XXEmZWPTk>].

TCPs and cultural/ethnographic landscapes can incorporate multiple elements of a community's history and culture into one distinctive "property." They can and often do include a variety of elements (e.g., plants, animals, minerals, ceremonial grounds, views, songs, stories, and histories) that all serve to highlight the significance of a place, explain the past, and inform present practices, worldviews, and beliefs. As Basso (1996:35) insightfully wrote "people's sense of place, their sense of their ... past, and their vibrant sense of themselves are inseparably intertwined."

3.2 The TCP Identification and Documentation Process

As noted above in subsection 3.1, TCPs are associated with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community (Parker and King 1998:1). Because of their strong connection to a living community, TCPs are best identified by consulting directly with the community that ascribes value to that particular geographic area. Members of the traditional and/or descendant community often have unique knowledge and experiences that directly relate to the significance of the property in question.

Although various publications, archival maps, art pieces and poems, archaeological reports, ethnographic materials, and other various forms of "gray literature" can contribute toward the identification and documentation of a TCP, it is frequently within the community itself that the greatest knowledge of a property resides. Oral traditions, historically-rooted beliefs and worldviews, traditional customs, cultural practices, pilgrimages and other commemorative events connected to a place are frequently identified and fully understood only by the community members who partake in such activities. In many cases, information about a place is not widely known or documented outside of the community, and if it is, such information may be limited and may not accurately capture the depth and dynamics of the place, resources, or relationships. In the case of Minidoka, much has been published and recorded. This report summarizes the results of our literature review, in coordination with Friends, and interweaves the documentation with interviews and testimonies. Using this perspective, the report then follows the TCP identification and evaluation process following National Register Bulletin 38.

3.3 The Historical and Cultural Significance of the Minidoka Concentration Camp

The Minidoka National Historic Site is located in Jerome County, covering 388.3 acres of the original 33,000-acre Minidoka War Relocation Center managed by the War Relocation Authority (WRA). Jerome County is located in south-central Idaho near the town of Twin Falls. The county is surrounded by Cassia County and Minidoka County to the east, Twin Falls County to the south, Gooding County to west, and Lincoln County to the north. Jerome County is on the north side of the Snake River and is within the Snake River Plain.

The Minidoka National Historic Site contains unique historic and archeological resources, many of which are listed on the National Register of Historic Places. The Minidoka Concentration Camp, including its viewshed and landscape, is intimately connected to Japanese American history and longstanding multigenerational trauma (see Nagata et al. 2015). It is a place with countless stories of loss, isolation, and hardship, yet it is also a place of survival, perseverance, and the overcoming of extreme adversity. In this context, Minidoka can best be classified as a site valuable for its ability to depict the darker sides of American history, a place of “negative heritage” – sites that may be interpreted by a group as commemorating conflict, trauma, and disaster (Rico 2008) – akin to places like the Trail of Tears that preserves a record of the forcible removal of Native Americans or sites that exhibit the brutal realities of slavery.

Overall, Minidoka, and the many contributing elements that compose and define the property, is a place that must be remembered and preserved not only for its educational value, but to ensure such atrocities are never repeated again:

The preservation and educational interpretation of incarceration sites such as Minidoka are vital to share the experience in a way that transforms and inspires. As a third generation Japanese American whose family was incarcerated during WWII, it is important to me to ensure that this history is not forgotten, nor ever repeated [Lynn Fuchigami Parks, Friends of Minidoka Board, Portland, OR].

Before it ever became one of the U.S.’s Japanese American concentration camps during World War II, the area now known as Minidoka was home to bands of the Northern Shoshone and Bannock people who have used and occupied the area since time immemorial. These peoples subsisted on the Snake River Plains and surrounding montane regions, establishing deep-time connections to specific resources and places associated with the area. These deep-time relationships still exist today, intentionally and actively cultivated by the tribal descendants of those first peoples. The proposed TCP is located on federal lands subject to off-reservation rights reserved by the Shoshone Bannock Tribes in the Fort Bridger Treaty.

Although outside the scope of this particular Study, it is likely that the Minidoka area is also historically and culturally significant to the Shoshone-Bannock Tribe (and potentially other Tribes and descendant communities with ties to the region). A separate TCP study, and/or a tribally-conducted traditional landscape study, should be conducted with these other communities to document the historic significance of this area.

3.3.1 The Early History of the Minidoka Concentration Camp

Due to the Chinese Exclusion Act, the need for unskilled workers led to a wave of Japanese immigration largely beginning in the 1880s. After political and social upheaval in Japan during the Meiji Restoration, Many Japanese immigrants known as Issei first came to Hawai’i as contract laborers to work on the sugar plantations. From there, primarily young male Japanese immigrants traveled to the U.S. mainland finding manual labor work on the railroads, in the fields of white homesteaders migrating West, at sawmills, and in clearing land for mines. Many of these Japanese immigrants started marrying Japanese “picture brides” through proxy. Soon the young couples began businesses and families in many places along the western seaboard (Friends of Minidoka n.d. and NPS 2020).

As immigration grew, some white Americans became suspicious of Japanese immigrants who looked different and came from a different culture. Agitation mounted on the West Coast, many seeking the U.S. “do something about the Japanese) (Stacy 2020:9). Several states passed anti-Asian Land laws, which prevented Japanese immigrants from owning land. Although the children of these immigrants born in the US automatically gained citizenship, their parents were barred by law from becoming naturalized citizens until the 1950s. Despite the hostile environment, Japanese immigrants and their American-born children settled down and built strong communities and institutions in many neighborhoods across the U.S. Over the next four decades, several thousand Japanese immigrated to the United States (NPS 2020).

The Pearl Harbor attack intensified existing hostility towards Japanese Americans. As wartime hysteria grew, President Roosevelt signed Executive Order 9066 which enabled the forced removal of over 120,000 persons of Japanese ancestry (Nikkei) into prison camps across the U.S. These actions removed the entire Japanese American population from the West Coast. One of the ten mass confinement sites – also called concentration camps – was named the “Minidoka Relocation Center” and held a largely urban population of Japanese Americans from Seattle, Washington, and Portland, Oregon, as well as elsewhere across Oregon and Washington (see Figure 5). The concentration camp also housed 100-200 or more incarcerated from Alaska, many of whom had Native Alaskan ancestry from multiple Native Alaskan villages that spanned much of the state (see Figure 6) (Friends of Minidoka n.d.; NPS 2020; Stacy 2020:23–24).

Seeking remote locations, the U.S. established Minidoka in south-central Idaho about twenty miles northeast of Twin Falls and 130 miles west of Boise. The route of forcible removal to Minidoka was often long and arduous, necessitating several staging areas like the Pullayup Assembly Center known as “Camp Harmony” in Washington. Beginning in 1942, the U.S. removed Japanese and Japanese Americans by train from the assembly centers to Hunt, Idaho, and then by bus the rest of the way to Minidoka. Waves of incarcerated continued to steadily be brought by train throughout August and September 1942 (Stacy 2020:16).



Figure 5: Incarcerated arrive at Minidoka in 1942. The WRA transported incarcerated from the railroad in Eden to Minidoka by bus. Many were shocked by their natural surroundings in the high desert of Idaho with sand and sagebrush stretching in all directions. Photo from the National Archives, ddr-densho-37-726.

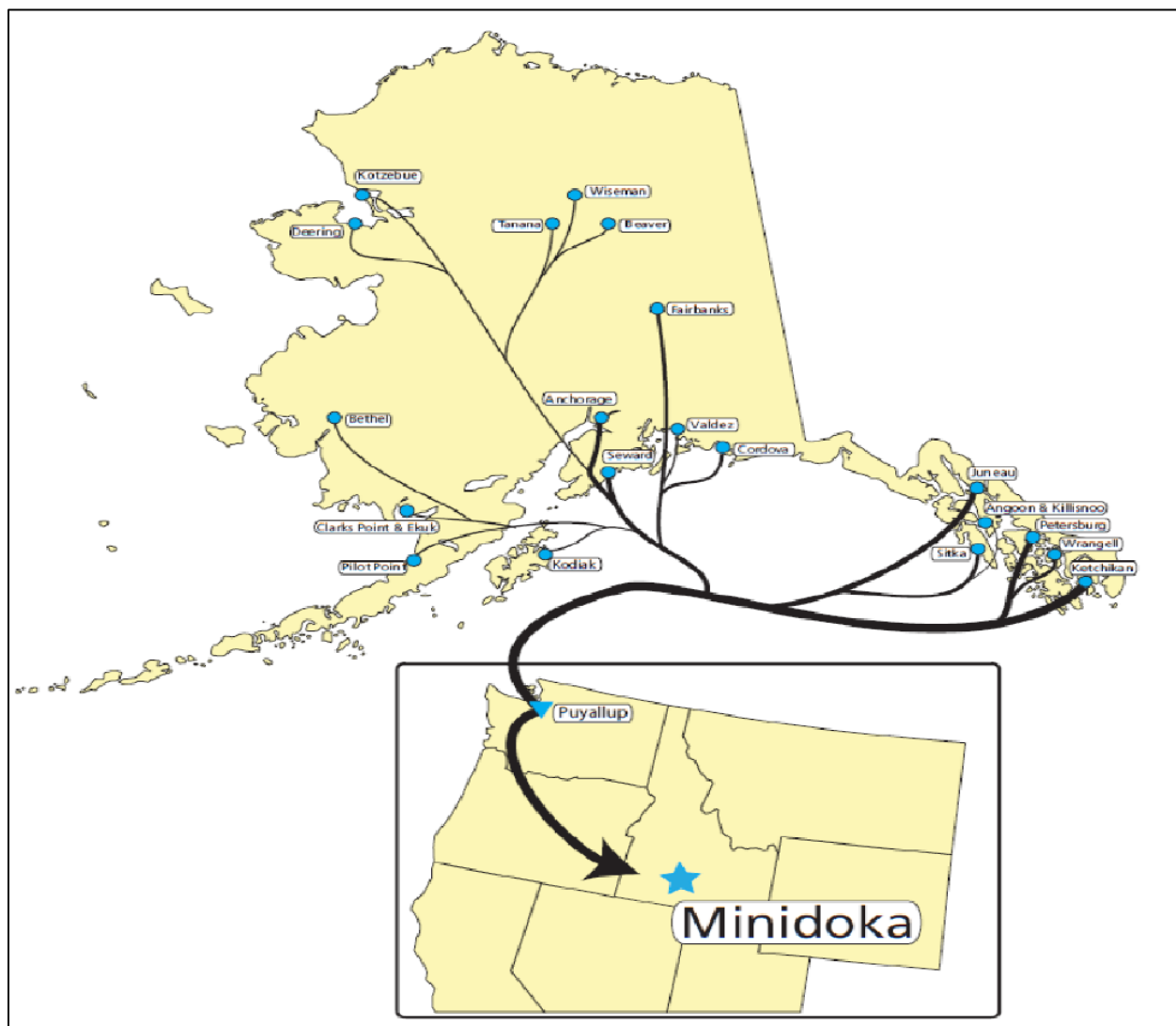


Figure 6: Map showing the forcible relocation of Japanese Americans and Alaskan Natives to the Minidoka Concentration Camp in south-central Idaho, courtesy of the National Park Service.

The Center's administrative and residential facilities resided on approximately 950 acres, functioning as a self-sustaining community. Incarcerees were held in thirty-five residential blocks, each with twelve barracks and a total population of about 250 people. Each block also included a mess hall, an "H"-shaped building that housed the laundry and bathroom facilities, and a recreation barrack. As in the other WRA camps, the barracks were 20 x 120 feet and divided into varying numbers of individual units. Minidoka also had two elementary schools, a high school, a post office, a library, a 196-bed hospital, two fire stations, a warehouse area consisting of 22 buildings, a newspaper, bands, choirs, orchestras and sports teams. In all, Minidoka contained more than 600 buildings (Friends of Minidoka n.d. and NPS. n.d.).

Although no fence existed around the camp when incarcerated began to arrive in August 1942, by November 1942, a barbed wire fence—along with eight guard towers—was constructed around a portion of the camp. As one would imagine, this fence – challenging what fleeting feelings of

freedom were left – greatly upset incarcerated, especially after the fence was electrified. Only a day after being electrified, however, Minidoka’s administration chose to leave the fence unelectrified. By April 1943, just five months later, much of the fence came down (Friends of Minidoka n.d. and NPS 2020).

The Center's population peaked at 9,397, making the concentration camp Idaho's 7th largest “city.” Although the original plans of the camp focused on incarceration for the duration of the war, agricultural demands in the area created interest for utilization of the incarcerated as an inexpensive labor force (Stacy 2020:41). Minidoka’s administration utilized inmate labor to produce food for camp consumption both at Minidoka itself and at other WRA camps. In fact, 2,400 Minidoka residents worked in agriculture during the 1943 harvest (see Figure 7, Figure 8, and Figure 9). The Utah-Idaho Sugar Company actively sought Japanese incarcerated labor, putting a four-column advertisement in the *Minidoka Irrigator*, the newspaper at the camp (Friends of Minidoka n.d.; The *Minidoka Irrigator* 1942a; Stacy 2020:39–40).

One of the biggest crops in the area around Minidoka at the time, which remains an agricultural staple in the Magic Valley today, is sugar beets. Incarcerated at the Minidoka concentration camp helped farm the sugar beets in the agricultural townships outside of the confinement site; these beets became an important part of Idaho’s agricultural economy. In 1942, the incarcerated farm workers helped to save the sugar beet crop, although wages were unfair, hours long, and the work exhausting (Friends of Minidoka n.d.; The *Minidoka Irrigator* 1942a; Stacy 2020).



Figure 7: High school students from Minidoka pull onions on the project farm during “harvest vacation,” October 1943. Courtesy of the National Archives and Records Administration from the Densho Digital Repository, available at: <http://www.discovernikkei.org/en/journal/2019/9/2/minidoka/>.



Figure 8: Japanese Americans working on a farm surrounding the Minidoka concentration camp. Courtesy of the Densho Digital Repository with Description: Original museum description: Photograph, black and white glossy of a farm on the outskirts of the Minidoka internment camp. Workers are all women, five of whom are on the left side with one standing and two women squatting on the right. Other women are working in the back. (Info from original museum description) Japanese Americans raised livestock and grew produce such as potatoes, cabbages, and beans for camp consumption. Object ID: ddr-densho-39-12 (Legacy UID: denshoptd-i39-00012), Wing Luke Asian Museum Collection, <https://ddr.densho.org/ddr-densho-39-12/>



Figure 9: Japanese Americans doing farm work near Minidoka. Courtesy of the Densho Digital Repository with Description: Photograph, black and white glossy of Minidoka internees doing farm work along the canal. All of the workers are men with their backs to the camera and with either hoes, pitchforks, or shovels in their hands. Looks like they are clearing sagebrush. Two road graders are in the background. (Info from original museum description) The Japanese Americans at Minidoka raised livestock and grew produce such as cabbages, potatoes, and beans for camp consumption. Object ID: ddr-densho-39-27 (Legacy UID: denshoptd-i39-00027), Wing Luke Asian Museum Collection, <https://ddr.densho.org/ddr-densho-39-27/>.

In January 1945, the “Exclusion Order” was overturned through the landmark Supreme Court case, *ex parte Endo*, and the War Department permitted incarcerated to return to the West Coast. The Minidoka Center officially closed on October 23, 1945. After the camp was decommissioned, the Bureau of Reclamation offered the land and buildings for homesteading to veterans; Japanese American veterans were barred from entering this lottery for land. Some of the buildings from Minidoka were salvaged and removed. Many new and old farmhouses and irrigated fields now occupy much of the former site of southern Idaho’s WWII concentration camp (Friends of Minidoka n.d.; Stacy 2020:163). For many decades after its use, the prominent visible reminder of the Minidoka War Relocation Center was a lone lava rock chimney tower and portions of the military police station and check point. There were, of course, other buildings, some partially visible, including the remnants of a fire station and vehicle mechanic auto shop as well as a rock garden. Since then, various restoration and interpretive efforts have allowed for a return of the site to the greater public consciousness (Friends of Minidoka n.d. and NPS 2020).

By the 1970s, the general American public began awakening to the atrocities that occurred at Minidoka, and the importance of memorializing the location. This awakening was, in large part, due to the Japanese American community who published books like *Concentration Camps USA: Japanese Americans and WWII* in 1969 and *Farewell to Manzanar in 1973* (Stacy 2020:163–165). Minidoka was formally listed in the National Register of Historic Places on August 18, 1979. On January 17, 2001, President Bill Clinton designated the Minidoka Internment National Monument as the 385th unit of the National Park Service in one of his final acts before leaving office. The proclamation preserved and protected 72.75 acres of the original 33,000-acre Minidoka War Relocation Center. The U.S. Congress later passed Public Law 110-229 on May 8, 2008, expanding the national monument to 388 acres, and changing the name to Minidoka National Historic Site (Friends of Minidoka n.d. and NPS 2020).

3.3.2 Stories of the Japanese American Incarceration Experience at Minidoka

The stories associated with Minidoka are much too numerous to include in their totality here; these many stories can be found in various publications including *Minidoka: An American Concentration Camp* by Teresa Tamura (2013), *Minidoka National Historic Site* by Hanako Wakatsuki, Mia Russell, and Carol Ash (2018), *Looking After Minidoka: An American Memoir* by Neil Nakadate, Ben Percy, Dean Bakopoulos (2013), and *An Eye for Injustice: Robert C. Sims and Minidoka* edited by Susan M. Stacy (2020), among many other publications, diaries, and interviews.

The excerpts included below have been carefully selected to best characterize the incarcerated experience. The quotes, which help to better contextualize the experience through their eyes, also help to define and delineate the historic property. For example, Mae Hada, an incarcerated at Minidoka, recalled the shock and devastation both her and her mother immediately felt upon seeing the Minidoka concentration camp for the first time:

Well, it was devastating for my mother. We came all through by train and then bus. And when we drove up, there was a total cloud of dust. You couldn't see five feet. After that, it was all dust because they built this huge area for us to come to, barbed wire and all, and these residences were barracks ...

It's the first time I saw her cry hard. "What did they bring us to?" she said in Japanese. Anyway, they, of course, slowly, we were able to be registered coming in, assigned places to come to, and it was just my mother, my sister and

myself, I remember, and so we had an end apartment. I forgot how many units there were in each barrack. I would say maybe eight. It's just a guess. We had numbers on our place. And do you want a description of the room we were assigned? It was unfinished walls.

So, you see it was pretty, some dust would come in. And we had cots and one potbelly stove to burn coal for warmth and one recessed area for a closet. That was it. People wanted more had to build their own home up with shelves and so on. We weren't able to do that. We managed. And we were, of course, regimented according to time for breakfast, lunch, and supper. We were told where the main buildings were, where the lavatories were...

And what else do you want to know about the living situation? We had to dig up our own coal when the winter weather came. The first time I experienced such cold that when you breathed, we never had this in Oregon. You'd have icicles on your nostrils. It was scary. And we would have to dig up our own coals, so we can burn it in our, burn it in our stove in our cabin, if that's what you can call it ["Mae Hada Interview" by Masakuo Hinatsu. Densho Visual History Collection, Densho Digital Archive. Densho. June 18. 2003. <https://ddr.densho.org/media/ddr-one-7/ddr-one-7-20-transcript-091b5afb0d.htm>].

In another interview, Maru Hirata recalled her first impressions of Minidoka:

I couldn't believe that that's where we were going to be, but like I say, my folks never made a fuss about anything, so it was just part of our life, so... I used to think, "My God, the dust!" You couldn't see one barrack to another one, it blew. And then the wintertime, or when it rained, you lost your shoes if you weren't careful. At least the men were nice enough to make little walkways for, from barrack to barrack. I think about Mom having to scrub all our clothes on the washboard. And I think, oh I was so awful, I didn't ever help her and I feel... now I feel guilty [laughs]. But she never complained. And we lived in one room again.

It was a larger room. Mom used to come home from the bathroom with toilet paper, I could never figure out what it was for. And I'd see her making little wads and plugging up the holes, so she wouldn't have to clean all the time. You could see the little piles of dirt with each crack where the dust would come in...

Uh-huh, because there were no inside walls. They were just outside walls. So, like around the windows, there would be little holes, and the dirt would just kind of pile up in little piles there. And we had a pot belly stove. And I don't know how I did it, but I remember I got two dollars -- I don't know whether Mother gave it to me or what -- but I went to the canteen and I bought two bedspreads. Can you imagine? For a dollar apiece. And my brothers and I, we hung 'em up to make a little room for Mom and Dad. Because, if we stayed up late at night to play cards or whatever, then at least they could go to bed in peace ["Mary Hirata Interview" by Beth Kawahara and Alice Ito. Densho Visual History Collection, Densho Digital Archive. Densho. March 27, 1998.

<https://ddr.densho.org/media/ddr-densho-1000/ddr-densho-1000-22-transcript-ea0433fee0.htm>].

Another incarcerated, Victor Ikeda, recalled his experience traveling to Minidoka and his impressions when he arrived:

Well, it was kind of a secret, but we had heard that we were going into Idaho or someplace. We got in the train not knowing where we were going. It took us, I think, a couple of days to get out there. And I remember when we got there the train stopped at Eden, and that was the end of the line, it was kind of a transfer point. And then when you got out you looked around and wondered where in the devil we were [Laughs]. I remember we left in August so you can see it was pretty dusty and hot, and it was kind of like a God-forsaken place that we landed up in...

We got there, and, of course, we went through the gates and there were, the guards were there. And you looked down, and all of the sudden you could see the barracks. You could see some barracks in Block 1, 2, 3, 4. They were building other ones, but it almost looked like a prison camp because they were just tarpaper barracks. It was dusty, I remember.

When we got there you had a guard tower, and you had guards, and there was barbed wire right at that point there. There was an administration building there so you had to come through that to get into camp. And then they had barbed wire around part of the areas. The other part was a canal, so... ["Victor Ikeda Interview" by Richard Potashin. Available at the Densho Visual Archive Collection, Densho Digital Repository. Densho. November 6, 2007. <https://ddr.densho.org/media/ddr-manz-1/ddr-manz-1-23-transcript-8f69d5e15b.htm>].

Janet Keegan, a descendant of a Minidoka incarcerated, recalls the expansive sagebrush as you come into Minidoka:

When I visit MNHS [Minidoka National Historic Site], I usually approach from the southwest along Hwy 25. My Nisei friend said very quietly, "those are the railroad tracks that took us to camp". It is all sagebrush and lava rock in the area. The train stopped in the village of Eden and the incarcerated were put on buses to camp. The road from Eden to MNHS is very, very much like what is must have been in 1942 which is what the viewshed would have been. Sagebrush and basalt rock as far as the eye can see. No farm fields, no trees, no homes, just nothing in the eyes of someone from the Pacific northwest. I think about the fear going into the unknown, the not knowing for how long, the wondering how they were going to live [Janet Keegan, personal communication, 2022, emphasis added].

Tsuguo Ikeda, another individual interviewed about his experience at Minidoka, described a usual winter at the concentration camp:

So, I remember in Minidoka, especially in the wintertime, it was either raining all the time, it was just mud all over, sloshing through and sloshing into the classroom or the bitter cold, snow, 10 or 15 degrees below zero, and just walking through that to get to where you want to go. And felt a sense of pride of being tough, being a man. And with that kind of attitude, it helped adjustment, rather than just complain about it [“Ike.” “Tsuguo “Ike” Ikeda Interview” by Alice Ito. Densho Visual History Collection, Densho Digital Archive. Densho. Densho Visual History Collection, Densho Digital Archive. Densho. September 27, 2000. <https://ddr.densho.org/media/ddr-densho-1000/ddr-densho-1000-123-transcript-4e6063f739.htm>].

Louise Kashino, an incarcerated interviewed about her experience at Minidoka, recalled the near-constant sandstorms and windstorms that regularly overwhelmed the site:

But it was very hot and windy and sandy. I mean, sandstorms. So being out in the desert, it really kicked up the sand and that was something that was always with us, you know, throughout the winter or summer. They'd have windstorms and the sand would come through and... come through your windows. And your apartment would just be covered with sand and at that time I was working in the mess hall and we'd wipe up the tables after everybody got through with breakfast. Well, if there had been a windstorm, we'd come back and the whole place would be all full of dust and sand. Gritty sand so we'd have to wash all the tables again. But that was with us all the time [Louise Kashino Interview” by Alice Ito. Densho Visual History Collection, Densho Digital Repository. Densho. March 15, 1998. <https://ddr.densho.org/media/ddr-densho-1000/ddr-densho-1000-31-transcript-b537188758.htm>].

As noted previously, there are countless other stories of the incarcerated experience found in interviews, diaries, and multiple publications. These texts and archival sources all serve to shape, contextualize, and define Minidoka’s historical significance. Those included above serve simply to introduce the hardships, trauma, and pain experienced by those imprisoned at Minidoka.

3.3.3 Ongoing Historical and Cultural Significance Today

The ongoing significance of Minidoka is undeniably tied to the incarcerated experience at Minidoka; it is a place infused with the lives and stories of those who were imprisoned there:

The Minidoka Historical Site is more than a landscape to me and my family.

...It is a place that represents time and opportunities stolen from my dad in the prime of his young life (from 26-28 years old), and the last years of my great-uncle’s life in America.

... a place for which many committed activists have worked for untold hours, to obtain federal recognition, to reconstruct and preserve a permanent memorial of the injustices perpetrated against a small, disfavored minority during a time of national crisis.

... a place with special meaning for the Japanese American community which has since been dispersed throughout the nation and to other countries (I live in Mexico), but who want their families' experience to be preserved as a cautionary lesson that democracy is only as strong as those who defend it [Excerpt from a comment letter by Holly Yasui to the BLM Shoshone Field Office, dated Sunday, October 17, 2021].

The pain and trauma of those incarcerated continues today among the Japanese American descendant community. Inherent in both the incarcerated's experience and those visitors today is a poignant sense of loss, of lives uprooted and forcibly imprisoned in a land that only accentuated their isolation. Their stories – both of hardship and loss but also of perseverance, strength, and the overcoming of extreme adversity – live on in the hearts and minds of their descendants, and shapes the significance of Minidoka today. Speaking of this fact, Mari Shibuya, a Yonsei (4th generation Japanese American), stated:

The Minidoka National Historic Site is a place of immense significance to the story of the Japanese American (JA) community. It is a site that contains the trapped energy of decades of emotional repression that is still being integrated and healed in the JA community [Excerpt from a comment letter by Mari Shibuya to the BLM Shoshone Field Office dated Wednesday, October 20, 2021].

Similarly, as another descendant who visited Minidoka, Roland Ninomiya, related in a Friends of Minidoka blogpost:

I am a son of Calvin Ninomiya (June 9, 1926, Seattle - February 28, 2014, Bethesda, MD), who, together with his family – father (Kamesaku - August 1, 1878, Okayama Prefecture - August 21, 1945, Seattle); mother, Tetsu (Ueda) (September 1, 1891, Mie Prefecture - January 15, 1946, Seattle); and sister, Rose (October 11, 1921, Seattle - December 23, 2016, Seattle) and husband, Satoshi Masuda – was incarcerated at Minidoka during WWII.

The reason I am writing is that my brother Erik visited the Minidoka National Historic Site earlier today, and came across the plaque entitled "Creating Community," which describes the various efforts by those incarcerated to organize churches, operate stores and other needed businesses, and create a semblance of normality despite enduring conditions that were anything but normal.

Two of the photos in the "Creating Community" plaque are entitled "barbershop." One of those photos -- the one on the left -- is, I am quite sure, of my grandmother Tetsu, who operated a barber shop in Seattle before the family was shipped off to Minidoka. She is standing in a pair of boots, facing the man in the barber chair. Her face is half in shadow, but it is undoubtedly her.

I hope this provides a bit of additional context regarding the plaque's content. My grandmother died more than 76 years ago now, as well as years before I

was born. She had a short and hard life. I suspect she would be amazed that her image is preserved today in a photo on display in a bleak patch of Idaho more than 5,000 miles from her place of birth. I know that I am [Friends of Minidoka 2022a].

Roland Ninomiya's brother, Erik Ninomiya, expanded on his experience during the same visit, writing about the restoration efforts undertaken by the NPS that helped to convey a better sense of place, in part due to that feeling of bleakness, remoteness, and sense of isolation instilled by the surrounding viewshed:

Dad (Calvin Ninomiya) would have been so heartened! The last time he visited (well before he died in 2014), there was honestly not much to see -- the ruins of the stone entrance gate, a few sagging buildings, the dusty beginnings of an interpretive trail. Amid a sea of sugar beets, he struggled to recall the outlines of the camp that he and his family had once called home.

It means so much to now be able to see a barracks building, the reconstructed barbed wire fencing, a guard tower, the baseball field, the swimming hole off the irrigation canal. *You truly get a sense of the vastness of the camp and the "everydayness" of life in Minidoka -- as well as the heartache, bleakness, and waste of it all* [Friends of Minidoka 2022a, emphasis added].

Intrinsic to Minidoka's ongoing historical and cultural significance to the descendant community is the property's ability to convey this sense of isolation and bleakness, predominantly expressed through its remoteness and the expansiveness of its largely unobstructed, wide-open viewshed:

The remoteness of Minidoka (and other American concentration camps) is a fundamental part of its cultural history. Japanese Americans were rounded up and corralled into the most desolate, undeveloped parts of America [Excerpt from a comment letter by Holly Yasui to the BLM Shoshone Field Office, dated Sunday, October 17, 2021].

In a comment letter, another Japanese American descendant of the U.S. concentration camps recalled:

...my first pilgrimage was to Minidoka in 2016. The effect of being in the space, on the land, breathing in the dust of the site made my experience more powerful than if I had just gone to a museum. The vastness yet with a feeling of emptiness is a huge part of the feeling of isolation that the incarcerated must have felt while imprisoned there [Excerpt from a comment letter by Kimiko Marr to the BLM Shoshone Field Office].

The pilgrimages and other events that occur with regularity at Minidoka underscore the ongoing significance of the site to the descendant community (see Figure 10). These pilgrimages demonstrate the desire and need for continued reflection and introspection, for continued processing of the multigenerational trauma and loss, for ongoing commemoration of those who suffered at the site, and eventually, steps toward healing:

As an adult, I have gone on two prior pilgrimages to Minidoka. I went on the first pilgrimage to gain an understanding of what the last years of my mother's life at Minidoka had been like, hoping to meet someone who actually knew her. The isolation and desolation of the Minidoka landscape and viewshed was a bit shocking. It was also heartbreaking to think that this was the bleak prison that my mother had to endure as her life was coming to an end. It seemed as if the country had intentionally buried my family in an isolated place where we would conveniently become invisible. Not surprisingly, I came away from that pilgrimage still emotionally unsettled about the premature death of my mother.

My second pilgrimage to Minidoka in 2017 was different. The most important thing that I learned during that pilgrimage was that a large number of babies had died during their first year at Minidoka. This hit me like a sledgehammer and told me that my mother must have really loved me if she was able to keep me alive as a baby without running water in our barrack and months of blistering heat and arctic cold.

It also allowed me to transform my prior negative reaction to the isolation of Minidoka. Instead of it being a source of anger, I now found its isolation and lack of distractions as connecting me to the love I had received from my parents while in Minidoka. Its very isolation now allowed me to view the camp differently as a place of hallowed ground. And from this, after 70 years, I finally found closure with the death of my mother [Comments by Teiko Saito, available at <https://docs.google.com/document/d/1RSOKMj3aFT-gor6NSFMuKMD3hxRv-KQLC6oxl0ptCIQ/edit?usp=sharing>].



Figure 10: 2016 Minidoka Pilgrimage, attended by some of the original incarcerated and descendants, photo courtesy of the Minidoka Pilgrimage Planning Committee.

3.3.4 Summary of the Traditional Cultural and Historic Significance

The above statements testify to the historical weight and ongoing importance of the stories of those who were imprisoned at Minidoka. The Minidoka property is the physical manifestation of those stories, a place where the experiences can be remembered and memorialized not only by the Japanese American descendant community, but by all Americans who share in common the history of this Nation.

There are multiple aspects to the historic significance that characterize the Minidoka National Historic Site both in terms of its resources and historic values. These elements still continue on today and include, as stated by the NPS:

Fragility of democracy in times of crisis: Minidoka National Historic Site is a compelling venue for engaging in a dialogue concerning the violation of civil and constitutional rights, the injustice of exclusion, forced removal and incarceration of the Nikkei community, the history of racism and discrimination in the United States, and the fragility of democracy in times of crisis.

Relevancy: Minidoka National Historic Site encompasses sites in both rural Idaho and near Seattle, Washington, that offer a unique setting to reflect on the exclusion, forced removal, and incarceration experience of the Nikkei community and its relationship to contemporary and future political and social events.

Patriotism, citizenship, and choices: Minidoka National Historic Site provides a forum for understanding how Nikkei demonstrated citizenship and patriotism through individual choices, which affected families and communities. Choices reflected a range of responses including serving valiantly in the military, supporting the war effort on the home front, and protesting the civil injustice [NPS n.d.].

Minidoka's remote location in the high desert of Idaho provides an immersive setting that is fundamental to visitors' experience of Minidoka's sense of place. Views of open fields and distant mountains create a sense of isolation on a vast landscape where Minidoka once stood. The smell of high desert sagebrush contributes to this environmental setting. Extreme changes in temperature, the arid environment, and high winds that incarcerated at Minidoka experienced are part of the environmental setting that are felt today. Experiencing this environmental setting allows visitors to better understand and connect to the daily lives at Minidoka.

Nikkei cultural traditions, values, and attitudes are essential to understanding how Nikkei experienced and reacted to incarceration and life within the camp. These include concepts of *gaman* (perseverance), *shikata ga nai* (it cannot be helped), *giri* (duty), honor, family, loyalty, and nationalism, among other deeply importance cultural values.

Ultimately, the Minidoka property provides a place for education, engagement, reflection, and healing. This opportunity and ability for the site to provide some bit of catharsis and begin healing the wounds of loss and multigenerational trauma is perhaps the site's most important feature:

For many of the survivors, attending our pilgrimage [Minidoka Pilgrimage] is the first time they've been back to Minidoka since they were incarcerated behind the barbed wire. This annual pilgrimage helps to bring healing and some closure to a painful and traumatic time period that has remained open for them [Excerpt from a comment letter by Ryan Kozu to the BLM Shoshone Field Office, dated Tuesday, October 19, 2021].

3.4 Contributing Elements of the Minidoka Concentration Camp

Minidoka contains several historic structures and features, cultural landscapes and viewsheds, and archeological resources. These fundamental resources are associated with the period of incarceration (1942–1945) and include many buildings, structures, objects, and sites altogether forming a traditional cultural district. Algonquin’s research included reviewing the many elements that contribute to Minidoka’s historical significance, examining information found in archival maps, published and unpublished reference materials, interview transcripts, and in-person discussions with the Friends of Minidoka Board of Directors and the Japanese American descendant community.

As noted in the preceding subsection, a cultural landscape is defined by the National Park Service as “a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values” (*Preservation Brief 36*; found at <https://www.nps.gov/tps/how-to-preserve/briefs/36-cultural-landscapes.htm>). Similarly, as also noted above, Page et al (1998:12) discuss the fact that cultural landscapes often contain “small⁴ plant communities, animals, subsistence grounds, and ceremonial grounds.” These elements not only contribute to a landscape’s NRHP eligibility, but may comprise “cultural resources” in their own right under the National Environmental Policy Act (see 40 CFR 1508.8 and also Section 5.0 of this report).

Taking a cultural landscape approach, this ethnographic overview study identified multiple contributing elements that are important to the Japanese American descendant community and contribute to the overall significance of the Minidoka property. These various traditional places and contributing elements of the landscape are briefly presented below.

3.4.1 Expansive, Unobstructed Viewsheds Depicting a “Landscape of Isolation”

Much like with the other concentration camps in the U.S. and Europe, Minidoka was selected for its remoteness from development. This, in fact, was one of the key selection criteria for the WRA and contributed to the “landscape of isolation”:

In order to avoid displacing large numbers of people, the site selection crews had to center their attention on lands which were underdeveloped or sparsely settled. And since the Army cannot afford in a time of war to disperse its manpower for protection of numerous small communities, the Authority had to locate areas capable of supporting a population of at least 5,000 evacuees.

In order to satisfy all of these rigid and sometimes conflicting requirements, the Authority tended to move more or less in the direction of “wilderness areas-

⁴ What "small" means is unclear.

among others, to the desert-type terrain of western Arizona, to the intermountain country of Wyoming not far from Yellowstone National Park, to the delta section of Arkansas only recently reclaimed from periodic floods [War Relocation Authority. "Relocation Communities for Wartime Evacuees"; September 1942. James Y. Sakamoto Collection, Box 10, Folder 38. <https://digitalcollections.lib.washington.edu/digital/collection/pioneerlife/id/16135/rec/1>].

Minidoka's remote setting is characterized by low rolling hills covered by seemingly endless bushes of sagebrush. In the distance are the pristine, unobstructed views of the Albion Mountains to the south. This landscape, depicted in historic photos (see Figure 11, Figure 12, and Figure 13), in Japanese American artwork from the time period (see Figure 14 and Figure 15), and in more recent photographs of the site (see Figure 16, Figure 17, Figure 18, and Figure 19) all convey this pervasive sense of remoteness; the views from the Minidoka Concentration Camp are vast, unobstructed, and truly eye-opening. The viewshed is central to the incarcerated experience, a vastness and emptiness that immediately instills a poignant sense of isolation.



Figure 11: View of the Minidoka concentration camp with expansive surroundings, photo courtesy of Boise State Public Radio article entitled "Minidoka National Historic Site makes annual list of nation's most endangered historic places", <https://www.boisestatepublicradio.org/news/2022-05-04/minidoka-national-historic-site-endangered-historic-places>.



Figure 12: Panoramic view of Minidoka concentration camp, Idaho. Courtesy of the Tazuma Family Collection. Image available and found at the Densho Digital Repository, Object ID ddr-densho-23-27 (Legacy UID: denshopd-p23-00027), <https://ddr.densho.org/ddr-densho-23-27/>.



Figure 13: Panoramic view of the Minidoka camp. Available at: Densho Digital Repository, Object ID: ddr-densho-37-746 (Legacy UID: denshopd-i37-00748), parent collection: National Archives and Records Administration Collection. Description: "Original WRA caption: A panorama view of the Minidoka War Relocation Authority center. This view, taken from the top of the water tower at the east end of the center, shows partially completed barracks." <https://ddr.densho.org/ddr-densho-37-746/>.

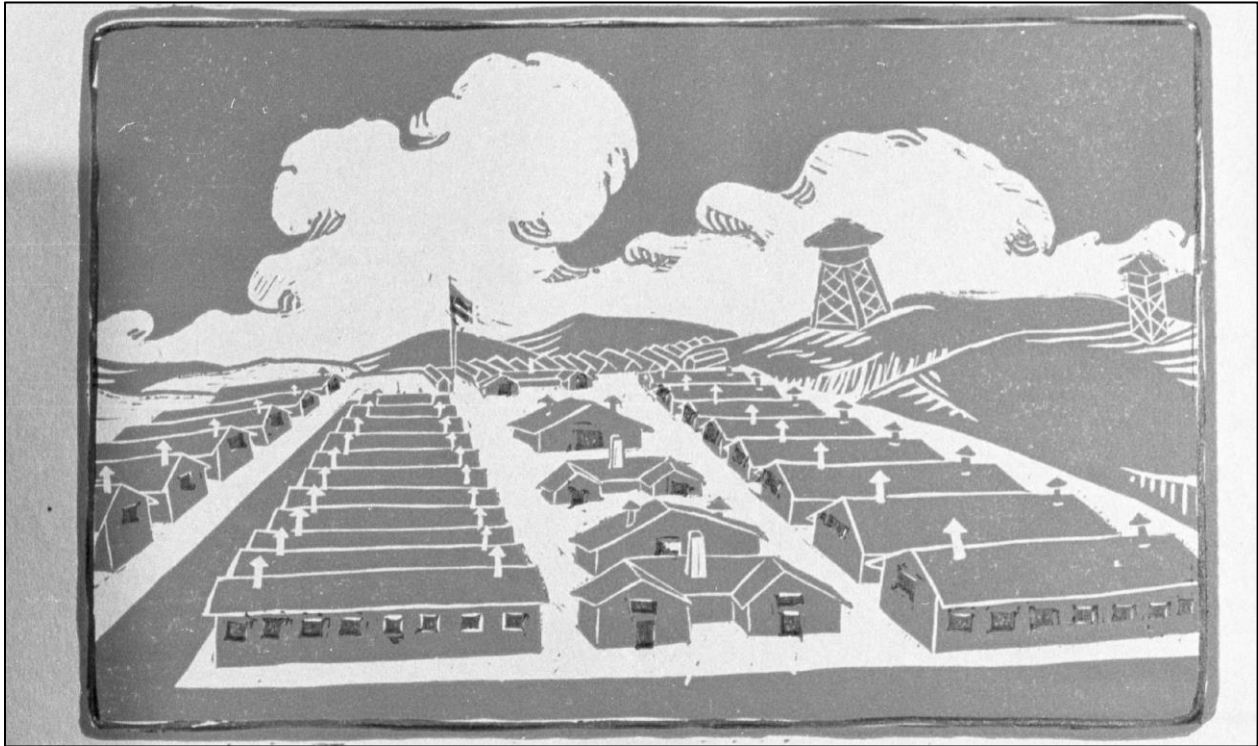


Figure 14: “Camp Christmas Card” of Minidoka. OBJECT ID ddr-densho-13-23 (Legacy UID: denshopd-p13-00023), Mamiya Collection in the Densho Digital Repository, a multi-partner initiative of Densho: The Japanese American Legacy Project, containing oral history interviews, photographs, documents, and other materials relating to the Japanese American experience. Additional information on the project is available at www.densho.org.



Figure 15: Roger Shimomura. Minidoka on My Mind: American Infamy #3, acrylic on canvas. Retrieved from: <https://taimodern.com/exhibit/roger-shimomura-minidoka-on-my-mind/>.



Figure 16: Expansive view from an interpretive sign at Minidoka, courtesy of Erik And Roland Ninomiya, Minidoka Descendants, Friends of Minidoka blog: https://www.minidoka.org/blog/2022/10/31/descendant-reflections-by-erik-and-roland-ninomiya?blm_aid=27237.



Figure 17: Expansive view from the replica fence line at Minidoka, courtesy of Erik And Roland Ninomiya, Minidoka Descendants, Friends of Minidoka blog: https://www.minidoka.org/blog/2022/10/31/descendant-reflections-by-erik-and-roland-ninomiya?blm_aid=27237.



Figure 18: Recent photo (circa 2022) taken from Minidoka looking out on the expansive viewshed, photo provided by Robyn Achilles, Friends of Minidoka, personal communication, 2022.



Figure 19: Photo of the sun rising from the Minidoka Concentration Camp demonstrating the expansive, unobstructed, pristine view from the historic site, photo provided by Robyn Achilles, Friends of Minidoka, personal communication, 2022.

In 1942, an editorial entitled “Eyes on Tomorrow” within the first publication of *The Minidoka Irrigator*, a weekly newspaper published at the Minidoka Relocation Center, spoke of the incarcerated first impressions about the remote region:

Minidoka, as we know it, is a vast stretch of sagebrush stubble and shifting, swirling sand—a dreary, forbidding, flat expanse of arid wilderness. Minidoka, in September of 1942, is the sort of place people would normally traverse only to get through to another destination [The Minidoka Irrigator 1942b:2].

For the Japanese American community, the historic characteristics of the viewshed remain:

The historic elements of the viewshed that remains important to me are the mountains, hills, farmland and just the wide-open space to the horizon. There are a few trees on the neighbor’s property but not many. It’s very far away, but I can see the desert (the BLM land) from the visitor’s center. The view from the root cellar which is southeast of the VC is very spectacular ... [Janet Keegan, personal communication, 2022].

The nighttime skyscape and viewshed of the stars across the open expanse is as important as the daytime views for many in the descendant community. The NPS’ dark sky initiative features the importance of minimizing light pollution. The NPS “recognizes a naturally dark night sky as more than a scenic canvas; it is part of a complex ecosystem that supports both natural and cultural resources” (NPS 2022).

At Minidoka, the nighttime dark sky is yet another character defining element of this important place that allows for deep reflection, contemplation, and introspection, especially of the many stories of loss and trauma that occurred at this site; in many cases, these stories are still being understood and processed today. The importance of the dark sky around Minidoka is highlighted by many in the descendant community, but can also be found in stories, interviews, and even art, as this historic Christmas card below demonstrates (see Figure 20).

As time has passed and farmlands have multiplied in the area, the present-day setting includes a surrounding of rural farms and irrigated fields, a labyrinth of irrigation canals and ditches, and a railroad line that traverses Jerome County from east to west. Fields of alfalfa, corn, barley, rye, and potatoes extend beyond the camp with intermittent farmhouses, outbuildings, and cattle pastures. Farmers, in fact, still use Minidoka’s original irrigation canals, as well as some of the wells and roads, and many of the original barracks and outbuildings.

Although certainly more modern intrusions and recent constructions have altered the landscape, the environmental setting still includes the expansive unobstructed views that serve to convey the sense of isolation, a critical component of the site and intrinsically tied to the historical integrity of Minidoka. Those feelings of isolation and loss were deeply felt by incarcerated who were forcibly removed to this area and had nothing to look at but the wide-open expanse. As Arthur Klienkopf, Superintendent of Education at the Minidoka Relocation Center, noted in his diary:

... these people are living in the midst of a desert where they see nothing except tar paper covered barracks, sagebrush, and rocks. No flowers, no trees, no shrubs, no grass. The impact of emotional disturbance as a result of the

evacuation . . . plus this dull, dreary existence in a desert region surely must give these people a feeling of helplessness, hopelessness, and despair which we on the outside do not and will never fully understand [Friends of Minidoka n.d., emphasis added].



Figure 20: Minidoka Night Sky on a historic Christmas card. Courtesy of <https://ddr.densho.org/ddr-densho-13-28/>. OBJECT ID: ddr-densho-13-28 (Legacy UID: denschapd-p13-00028). Description: This card was designed by a camp inmate. Densho Digital Repository, a multi-partner initiative of Densho: The Japanese American Legacy Project, containing oral history interviews, photographs, documents, and other materials relating to the Japanese American experience. Additional information on the project is available at www.densho.org

The experiences and testimonies of those incarcerated at Minidoka, especially their initial reactions, focused heavily on the remoteness of the area, its undeveloped and expansive desolate nature, and the overwhelming sense of isolation caused by this remoteness. One incarcerated, Art Abe, described his initial reaction to the desolate landscape and dry climate:

Gee, I looked out and I saw that desolate, desolate place on the side tracks of Eden, I couldn't believe what, where we were at [Abe, Art. "Art Abe Interview," by Tom Ikeda. Densho Visual History Collection, Densho Digital Archive. Densho January 24, 2008. <https://ddr.densho.org/media/ddr-densho-1000/ddr-densho-1000-206-transcript-ca077fc2db.htm>]

In another interview, Jim Akutsu, an incarcerated of Minidoka, discussed the expansive, unobstructed “openness” of the desert:

Number one, there is, you know, below the barracks, wide open and I want to close that, use the local people to close that. Here we had all the plumbing sitting out in the desert. Why can't we put it in? And I, as a civil engineer, I know exactly what to do and why can't we use people of camp? And the camp will say, "Hey, we have contracts out with such-and-such, such-and-such, we can't do anything." And I'm cold, I'm not feeling good and I have to go out to the john out between the blocks and here it is 20 below zero. Hey, let's get with it. And, you know, all of that is starting to come back, all of the things that we could do and we're the ones suffering [Akutsu, Jim. "Jim Akutsu Interview." By Art Hansen. Denso Visual History Collection, Denso Digital Archive. Denso. June 9 and 12, 1997. <https://ddr.denso.org/media/ddr-denso-1000/ddr-denso-1000-2-transcript-b1c658930f.htm>].

Multiple other incarcerated have underscored the remoteness and isolation of Minidoka describing the concentration camp as having expansive views of the rolling hills of sagebrush. They also describe the endless dust and desolation of the area, and the ever-present sense of isolation and remoteness. Several statements from interviews and testimonies describing these character defining elements of the site are provided below:

"My impression was all that sagebrush. That's all we saw. Nothing" (Fukui, Mitsu. "Mitsu Fukui Interview" by Alice Ito. Denso Visual History Collection, Denso Digital Archive. Denso. Interview archived and located at: <https://ddr.denso.org/media/ddr-denso-1000/ddr-denso-1000-140-transcript-d1da26ddf8.htm>. December 18 and 19, 2002).

"Sagebrush and dust and dust and sagebrush, a lot" (Uyeda, Fumiko Groves. "Fumiko Uyeda Groves Interview" by Larry Hashima. Denso Visual History Collection, Denso Digital Archive. Denso. June 16, 1998. Interview archived and located at: <https://ddr.denso.org/media/ddr-denso-1000/ddr-denso-1000-10-transcript-b07a40123b.htm>).

"Oh, [remember] thinking what a desolate place. I have never seen a desert type terrain before. I thought, "Where in the heck is this?" (Inahara, Hiro Heidi. "Hiro Heidi Inahara Interview" by Betty Jean Harry. Denso Visual History Collection, Denso Digital Repository. Denso. July 2, 2014. Interview archived and located at: <https://ddr.denso.org/media/ddr-one-7/ddr-one-7-75-transcript-fa47c1ce53.htm>).

"I do kind of remember finally arriving at, seeing the barracks. And I thought it was bleak, there were no trees, I thought, my goodness, where are we?" (Kajiwara, Lily. "Lily Kajiwara Interview" by Richard Potashin. Interview archived and located at Denso Visual History Collection, Denso Digital Repository. Denso. July 24, 2010).

"Day break finally came and with it a strange new country. Instead of seeing beautiful mountains as we did the day before, the scenery had changed to the barren desert full of sagebrush" (Tom Fukuyama, "December 7 On," December 1942. Interview archived and located at Bigelow Collection, Denso Digital Repository, <https://ddr.denso.org/ddr-denso-156-83/?format=doc>).

“When I first arrived here [Minidoka] we almost cried and thought this was land God had forgotten. The vast expanse of nothing but sagebrush and dust, a landscape so alien in our eyes, and a desolate, woebegone feeling of being so far removed from home and fireside bogged use down mentally, as well as physically” (Stacy 2020:16–17).

These testimonies of their experience underscore how the surrounding landscape itself – barren, foreign, arid, and unending – served as a prison, perhaps more so than the barbed wire fencing ever could:

The painful and traumatic experience and the lessons and legacy of this gross injustice for these American citizens is deeply intertwined and held in the environment of South-Central Idaho today. The forced exclusion and removal of Japanese Americans from the fertile land and productive businesses they had built along the West Coast to incarceration in the desolate interior was a means to break the cultural, emotional, political, and economic power of an entire community of color. Families were removed from the familiarity of their homes and communities to an unfamiliar and desolate landscape, which in itself became a prison [Robyn Achilles, personal communication, 2022, emphasis added].

Finally, the poem entitled “Minidoka”, written by Mitsuye May Yamada, an incarcerated, poignantly captures the trauma, loss, and sense of isolation of the remote, expansive, undeveloped area:

“The train stops at
the end of the tracks
literally.

The tracks simply sink into
the Idaho desert sand
disappear.

1942, a sunny April day
several hundred young and
old men, women, and children
from Seattle transported
by train from the temporary
Assembly Center
at the Puyallup Fairgrounds.
We are rickety bussed farther
into the desert.

All of us carry
an assortment of bags, sacks,
bundles and babies, in our arms.

After twelve hours we arrive
at a gate in a fenced-in area
What we see below the shades
of the bus window:
rows of tar-papered barracks

surrounded by barbed-wire fences.

We enter the gated compound
I suck in my breath
The air is dry
I look back
*Outside the fences are blankets
of low round sagebrush
stretched out wide for miles and miles.*

Minidoka
my home”

[Emphasis added, © 2019 Mitsuye May Yamada, from Full Circle New and Selected Poems, UCSB Department of Asian American Studies].

Following extensive outreach to the Japanese American community in the early 2000s, the National Park Service issued its General Management Plan which highlighted the importance of the scenery and viewshed to survivors and descendants. The GMP includes the sketch image below (see Figure 21) depicts part of Minidoka’s surrounding viewshed. The following image (see Figure 22) also shows the expansive viewshed from the barbed wire fencing with the camp and guard tower in the background. In reference to the importance of this viewshed, the NPS Minidoka Management Plan stated:

Minidoka’s remote location ... provides an immersive setting that is fundamental to the visitor experience. Views of open fields and distant mountains create a sense of isolation on a vast landscape ... Experiencing this environmental setting allows visitors to better understand and connect to the daily lives of Minidoka [NPS 2006:65].

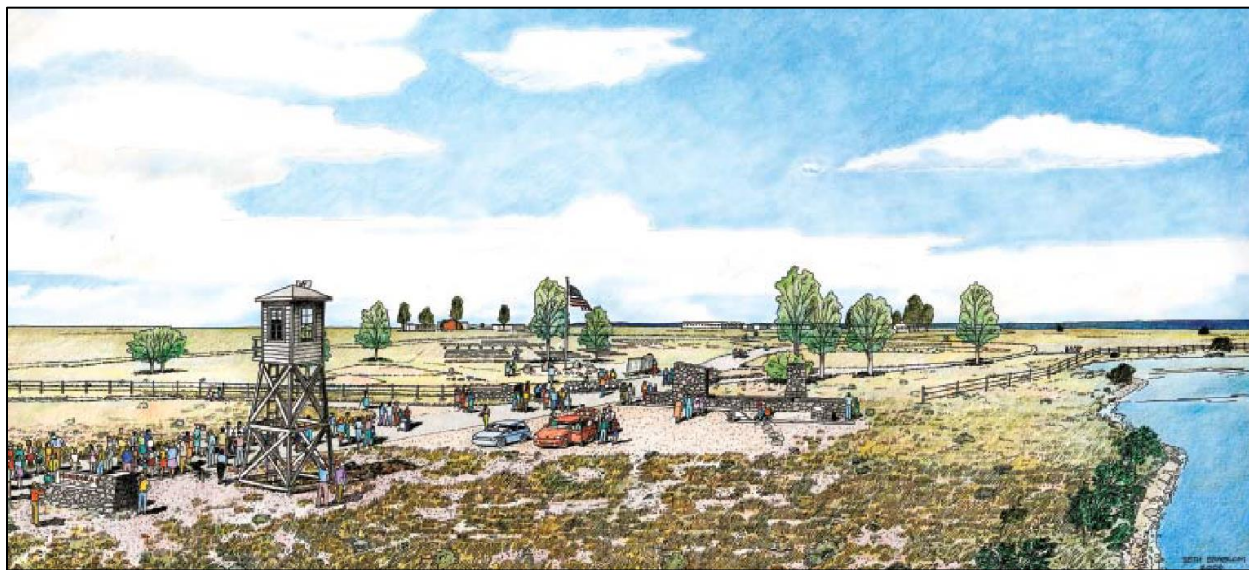


Figure 21: Conceptual sketch by Seth Seablom depicting “a special commemorative event, that might be held in the future, after park development, and following yet to be determined management actions designed to address conflicts between park visitors and vehicular through traffic”, found in the Minidoka General Management Plan (NPS 2006:65).



Figure 22:The fence line at Minidoka Relocation Center, circa 1943. Painting by Kenjiro Nomura. Courtesy of George and Betty Nomura, NPS Minidoka Management Plan (NPS 2006:5).

The NPS Minidoka Management Plan goes on to discuss the importance of the scenic views from the national monument:

Historic views to the North Side Canal from within the national monument will be preserved and restored, as feasible. Scenic viewing areas and interpretive overlooks along the northern boundary of the site and within the east end site will be developed to provide panoramic views of the physical extent of the historic residential areas [NPS 2006:76].

Finally, outlining and describing the NPS management zones for the Minidoka site, the management plan noted that for Management Zone 3: “Special Use – Park Development Zone”:

This zone will provide a place for intensive visitor contact and on-site interpretation. Additionally, the NPS can provide a place to *observe and interpret the full viewshed of the camp, including the extents of the historic residential housing blocks and the outlying open and expansive high desert environment* [NPS 2006:61, emphasis added].

In a comment letter dated October 20th, 2021, and addressed to Mr. Prestwich of the BLM Shoshone Field Office, Marie Matsuno, an individual of Alaskan Native and Japanese descent who was born at Minidoka, spoke about the viewshed and the remote, expansive, undeveloped setting, stating:

Minidoka's remote location in the high desert of Idaho provides an immersive setting that is fundamental to the visitor experience. Views of open fields and distant mountains create a sense of isolation on a vast landscape where Minidoka once stood...Extreme changes in temperature, the arid environment, and high winds that the people at Minidoka experienced are part of the environmental setting that are felt today. Experiencing this environmental setting allows visitors to better understand and connect to the daily lives at Minidoka [Marie Matsuno 2021].

The power of the intact, largely unobstructed viewshed to invoke this sense of the past cannot be understated:

On my first arrival to Minidoka, with no one else on site, I was standing alone; softly gazing in the distance In the quiet, undisturbed moment I felt reverential and a connection. I could 'see' my Nisei mom and her brother strolling not far away as they might done seventy years before. The silence and the 'pure' surroundings were important in invoking that state of mind; an impactful and emotional experience for me. All my family stories and their memories of Minidoka became real to me in that moment. I walked away with a deeper felt meaning of the family and community history [Excerpt from a comment letter by Shawn (Itoi/Nagashima) Brinsfield to the BLM Shoshone Field Office, dated Monday, October 18, 2021].

It is without question that the viewshed at Minidoka must be protected and preserved for later generations, something that is regularly underscored by the descendant community:

We need to preserve the Minidoka National Historic Site and its viewshed so that others can ask questions and learn about the Japanese experience during WWII ... so many fellow Idahoans do not know the history of Japanese Incarceration during WWII and how they impacted Idaho ... There is power in these stories. The words are sacred, and the stories must be told to preserve the past and protect the future [Lisa Shiosaki Olsen comments, https://docs.google.com/document/d/1izFB86lafn-nlv1nyviJXINF_Exv8JKuC1pudPUYIXc/edit?usp=sharing].

To protect the viewshed, Minidoka descendant, Dan Sakura tried to secure passage of legislation to expand the boundary of the Minidoka National Historic Site and increase the authority of the National Park System to acquire historic lands in the Fiscal Year 2010 Interior and Related Agencies Appropriations bill.

3.4.2 Soundscape

The soundscape at Minidoka is an important element to the Japanese American community. During its historic use, Minidoka was obviously full of the noises of prison camp life. Now,

however, it is the natural silence and stillness of the environment that instills a reflective state of mind. It helps those visiting the site gaze inward and reflect upon the memories, stories, and emotions of those who were imprisoned there:

It is very quiet at MNHS [Minidoka National Historic Site], especially if you wander away from any others who might be around. The VC [Visitors Center] is located on higher ground than that to the north, east and west so the vista is amazing. There are mountains to the north and southeast – actually really beautiful. MNHS doesn't seem far because it's only a 25-minute drive from my house, but the approach is a windy, narrow road and first I see the North Side Canal looming, then around a curve the guard tower replica comes into view. It's hard to explain the feeling I get seeing it. A type of dread almost. But a sense of isolation, remoteness, loneliness, fear, hopelessness, and helplessness all come to mind [Janet Keegan, personal communication, 2022].

3.4.3 Historically Significant Buildings and Structures

Barracks (the incarcerated living quarters) are significant physical features that accurately depict the internees' experiences at Minidoka. The lack of barracks and their original locations is certainly a significant concern (NPS 2006:7). There are some original structures from the concentration camp period, most in the agricultural fields surrounding the living quarters and other related buildings. The integrity of these buildings and structures remains unknown at this time.

3.4.4 Historic Cemetery

There was a cemetery at the Minidoka incarceration camp, located outside the barbed wire fence. During the use of the camp between 1942 and 1945, a recorded 193 people died and were buried at this cemetery. Service members who passed while serving in the U.S Armed forces were also provided funerals at Minidoka. As far as is presently known, all have been reburied elsewhere although there is certainly a chance other unrecorded burials exist.

3.4.5 Archaeological Resources

The archeological resources that have been identified at the national monument are comprised primarily of features and artifacts associated with the period of camp operation from 1942 to 1945. While objects that postdate the camp's closure were noted during the archeology survey at the historic site, no artifacts predating the camp were identified (Burton 2001). Regardless of the presence or absence of archaeological resources predating the historic use in the 1940s, the area is known to be significant to the Shoshone-Bannock Tribe (and potentially other Tribal communities); it therefore is also likely a traditional cultural landscape for the Tribe.

3.4.6 Other Contributing Features and Elements

Beyond the expansive viewshed, the buildings and structures, the historic cemetery, and the archaeological resources, Minidoka also has several other elements contributing to the site's historic and contemporary significance. These include the canal and irrigation system built by the Japanese American incarcerated and still in use today (see Figure 23 and Figure 24). Built in 1909, the North Side Canal was constructed as a main irrigation canal from the Snake River, bringing water for agricultural production to the region and influencing the layout of Minidoka. This vast irrigation system and the farmlands that depend on it contribute to the historic character and setting surrounding Minidoka.

Other components of the built environment – roadways, footpaths, farmlands, and other visible signatures of the concentration camp – are also contributing features. These serve to accentuate the expansiveness of Minidoka. Its very remoteness also underscores the immediate need to have the incarcerated develop the area in order for the concentration camp to function. Clearing the surrounding land for farms began this process to become more self-sufficient. One of the more significant and prominent features of the built environment at Minidoka is the camp's water towers (see Figure 23). Historic photographs provide important context for the geography and viewshed at the time of its historic use. The photographs will often show the water towers (or, at times, the imposing guard towers) rising above the other buildings and structures found at the concentration camp.



Figure 23: Field Irrigation outside Minidoka. Original WRA caption: Irrigation of a new field adjacent to the Minidoka Relocation Center is started within a short time after the area was cleared of sagebrush. Image available at the Densho Digital Repository, Object ID: ddr-densho-37-701 (Legacy UID: denshopd-i37-00701), Parent Collection: National Archives and Records Administration Collection, <https://ddr.densho.org/ddr-densho-37-701/>. Courtesy of the National Archives and Records Administration.



Figure 24: Irrigation ditch construction near the Minidoka concentration camp. Image available at the Densho Digital Repository, Object ID: ddr-fom-1-805 (NARA ID: 210-CMA-IC-6), Parent Collection: War Relocation Authority, Minidoka Collection, <https://ddr.densho.org/ddr-fom-1-805/>. Courtesy of the National Archives.

3.4.7 Previous National Register Nomination and Other Recognitions

A small portion of Minidoka concentration camp was listed on the National Register of Historic Places on July 10, 1979, which demonstrates historic integrity remained intact enough for listing. On January 17, 2001, President Bill Clinton designated the Minidoka Internment National Monument, spanning 73 acres. The site was renamed and expanded, through Congressional action, as the Minidoka National Historic Site in July 2008 and later expanded by the National Park Service via a minor boundary expansion. The viewsheds and other contributing elements included in the TCP build on this initial nomination and recognition of integrity.

3.5 Non-contributing Elements

Not everything within the area considered to be the Minidoka TCP contributes to the historic distinctiveness and ongoing traditional cultural significance for the Japanese American descendant community. It is beyond the scope of this study to list all non-contributing elements. However, they likely include modern buildings and structures, such as the “Farm-in-a-Day,” signage, pathways, and/or roads, some of which, of course, are or may be historically important individually.

Several more recent developments have also occurred within Minidoka that, although they do provide some semblance of the concentration camp’s historic footprint and feel, are likely not eligible. In 2012, for example, a 1.6-mile interpretive trail with twenty-three exhibit panels was completed. In collaboration with the Boise State University Department of Construction Management and funded by a Japanese American Confinement Sites Grant, a guard tower was

reconstructed. In honor of those who served in the U.S. armed forces, Minidoka National Historic Site also reconstructed the site's historic Honor Roll. The site also includes a historic barracks building and mess hall placed at Block 22 (Densho 2022). Friends of Minidoka built the replica Military Honor Roll, originally erected by incarcerated for their family members serving in the military during WWII and the replica baseball field, which was important to survivors who viewed baseball as a way to cope with incarceration. In 2020, the National Park Service opened its interpretive Visitors Center, located in a historic warehouse where vehicles were serviced.

3.6 Suggested Property Boundary

The TCP boundary includes more than the original barbed wire fenced area of the Minidoka Concentration Camp. In addition to the viewshed stretching across the surrounding landscape of the camp, as discussed above, the surrounding area was used not only as agricultural farmland to support the concentration camp, but also as hunting grounds and gathering areas to collect food and resources important to the daily lives of the incarcerated. Altogether, the viewshed, the areas used for agricultural farming, the areas where people hunted rattlesnakes and other small game, and the areas used for gathering sagebrush wood and other resources extend and help define the boundary of the TCP. Kay Endo, an incarcerated at Minidoka, discussed the larger boundary of the camp, describing that there was a "natural boundary" that extended far across the agricultural fields and canal to the edge of the viewshed; in essence, the extent of the views from Minidoka encapsulated their world:

KE: Well, for all purposes Minidoka was not wired [fenced] as such, it was... they may have in the beginning but later on there was no wire 'cause that's the site itself with 33,000 acres but originally portions of the camp were wired and then the canal side, there was no reason to have a fence.

RP: That was your boundary?

KE: That was a natural boundary. And then since they developed a lot of the lands for agriculture, what was the reason for a fence? And, so, we didn't see that much fencing, there probably was fencing but I can't really recollect it. And if there were we would have crawled through it or something. And you know, you couldn't go, where could you go? Just like being in Death Valley, right? [Endo, Kay. "Kay Endo Interview" by Richard Potashin. Courtesy of the Manzanar National Historic Site Collection, Densho Digital Repository, July 24 2019, https://ddr.densho.org/media/ddr-manz-1/ddr-manz-1-104-transcript-8c2b16ee_cc.htm].

Evidenced in the passage above is that the boundary, for all intents and purposes, extended beyond the fence – a natural boundary that included both the agricultural fields and public lands beyond those fields. As Victor Ikeda – another incarcerated at Minidoka – noted, individuals would frequently go out into the sagebrush surrounding Minidoka to hunt rattlesnakes and collect sagebrush wood:

Yeah, that's right, that's right. So, you know, it's not like the assembly center where you had barbed wires and guards. You just came to the main gate, and that was about it. In fact, after you got a little established, a lot of, like my dad and stuff will go out to sagebrush to get the sagebrush wood. Some would go

after rattlesnakes and bring it back so they could eat the rattlesnakes. So, it was pretty wide open, so I don't think anybody thought of like the illegal coming over, crossing a desert or anything, 'cause there's no place to go [Ikeda, Victor. "Victor Ikeda Interview" by Richard Potashin. Courtesy of the Densho Digital Repository, November 6, 2007. <https://ddr.densho.org/media/ddr-manz-1/ddr-manz-1-23-transcript-8f69d5e15b.htm>].

Based on the identification of the various contributing elements presented above, the Minidoka property is a unique place that minimally includes the camp facilities, as well as the surrounding agricultural fields cleared and farmed by the incarcerated and the expansive viewshed beyond the boundary of the Minidoka War Relocation Center. Figure 25 displays the proposed boundary of the TCP based, in part, on Algonquin's viewshed analysis combined with other ethnographic sources informing the suggested demarcation.

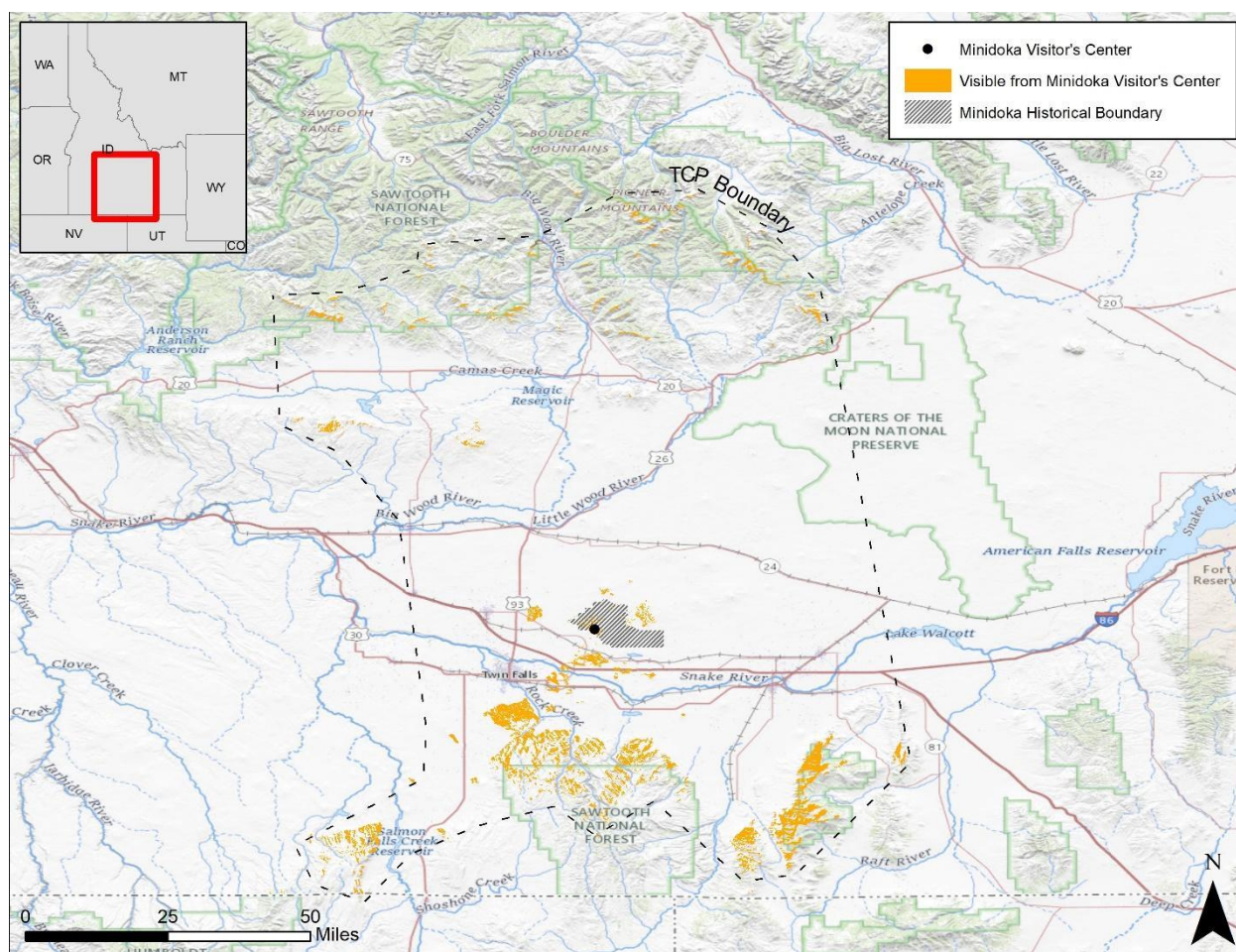


Figure 25: Viewshed from the Minidoka National Historic Site Visitors Center that informs, at least in part, the proposed boundary of the Minidoka TCP.

To establish the extent of the viewshed from the National Historic Site itself, Algonquin conducted a viewshed analysis in ArcMap 10.8 using the Viewshed tool in the Spatial Analyst extension. ArcMap's Viewshed tool uses a raster elevation surface and input "observer" points to determine

the area visible from the observer point at a given height above the ground (ESRI 2022). The state of Idaho's Digital Elevation Model (University of Idaho NKN 2019) was clipped to an approximately 150 x 120-mile rectangle in the vicinity of Minidoka. In consultation with the Friends of Minidoka, Algonquin selected the Visitor's Center for the historic site as the observation point from which to conduct the analysis, with an eye height of 2 meters (approximately 6 feet) and a refractivity coefficient of 0.13 (default). The tool was also set to account for earth's curvature.

4.0 Establishing Eligibility for Listing in the National Register of Historic Places

Bulletin 38 outlines four steps to establish whether a TCP is eligible for listing in the NRHP. These steps are listed and discussed below:

4.1 STEP 1: Ensure that the Entity Under Consideration is a Property

National Register Bulletin 38 specifies that "the entity evaluated must be a tangible property—that is, a district, site, building, structure, or object" (Parker and King 1998:11). It should be briefly noted that these requirements—that a historic property be a specific property type, have integrity, and meet the NRHP criteria—are not required by Bulletin 38, but by the NRHP regulations at 36 CFR 60.4. Bulletin 38 simply restates these requirements; it is not the source of authority for them. As we established in the preceding section, the Minidoka property is easily regarded as a traditional cultural landscape, and as such, is a distinctive physical, tangible *property*. It is a place with contributing physical and non-physical elements that, altogether, comprise the TCP. Roughly, this property extends from...

Among the property types listed in the NHPA, the Minidoka property would be best characterized as a district. The National Park Service defines a district as:

... a geographically definable area, urban or rural, possessing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by a plan or physical development. A district may also comprise individual elements separated geographically by linked by association or history (36 C.F.R. 60.3(d)).

Following this definition, Minidoka is a geographically definable area that encompasses and is largely defined by the concentration of interrelated and linked buildings, sites, and viewshed surrounding the national monument.

4.2 STEP 2: Consider the Property's Integrity

National Register Bulletin 38 notes that "in order to be eligible for inclusion in the Register, a property must have 'integrity of location, design, setting, materials, workmanship, feeling, and association'" (36 CFR 60.4). In the case of the Minidoka property, integrity of relationship (which can encompass aspects of integrity of association and integrity of feeling) and integrity of condition (which can encompass aspects of integrity of setting, location, and design, materials, and workmanship) are both present. It should be stressed that a property is not required to meet every type of integrity. In the case of TCPs specifically, the two main things to ask are "first, does the property have an integral relationship to traditional cultural practices or beliefs; and second, is the condition of the property such that the relevant relationships survived?" (Parker and King 1998:11). These questions regarding integrity, along with the NR listed integrity types, are discussed further below.

4.2.1 Integrity of Relationship (Feeling and Association)

Bulletin 38 clarifies that if a “property is known or likely to be regarded by a traditional cultural group as important in the retention or transmittal of a belief, or to the performance of a practice, the property can be taken to have an integral relationship with the belief of practice, or vice-versa” (Parker and King 1998:11). On this point, Minidoka continues to be an actively used place that is and will continue to be a long-remembered, memorialized, and commemorated historic place by the descendant community, many of whom regularly visit. Some, in fact, make the annual trip to Minidoka to pay respect to those who were imprisoned there.

The existence of multiple organizations also underscores the strength of the descendant community’s relationship with the site. For example, the Friends of Minidoka, a non-profit based in Twin Falls, Idaho, and founded in 2003, is an organization that helps to organize and give a voice to this descendant community. The Japanese American Memorial Pilgrimages provide a centralized resource for promoting pilgrimages and educating people about the World War II Japanese American incarceration camps. The Minidoka Pilgrimage offers former incarcerated, their family members, friends, and allies opportunities to visit the site. Many other similar organizations continue to tell this important story, serving to demonstrate that Minidoka remains an important and historically significant place today, one that greatly informs the descendant community’s history, heritage, and identity. As Lauren Waudé, a descendant of an incarcerated and acting Secretary of the Friends of Minidoka, noted:

Friends of Minidoka’s work and mission are so important to me personally and play a critical role in preserving the history of Japanese American Incarceration. I never learned about JA incarceration in school, and my family didn’t always openly discuss their painful experience at “camp” and the emotional, social and financial toll it took on them. As a yonsei, fourth generation Japanese American, I feel it is vitally important to understand how the history and generational trauma of incarceration continues to impact me, my family, and the Japanese American community and how we can lift up this history to advocate for racial justice [Friends of Minidoka n.d.].

Speaking of how Minidoka also informs her identity, history, and heritage, Vice-Chair of Friends of Minidoka, Julianne Abe, stated:

It wasn’t until after my grandparents passed that I learned the extent of their trauma from being imprisoned at Minidoka for over 3 years but also the perseverance it took to rebuild after the war. This led me to Friends of Minidoka. I serve on FoM’s [Friends of Minidoka’s] board to preserve the history and legacy of my grandparents and the thousands who endured the WWII incarceration. FoM [Friends of Minidoka] has given me the opportunity to connect and learn from survivors and families who have been impacted, deepening my knowledge and allowing me to educate others about this forgotten part of our history. It’s important to me to spread awareness about the WWII incarceration experience to make sure it doesn’t get lost or overlooked. [Friends of Minidoka n.d.].

For survivors and their descendants on pilgrimage back to the site, being transported back to Minidoka and the significance of returning to the physical place where so much trauma occurred

can be an emotional rollercoaster. This internal turmoil underscores the historical weight of the property and its ability to continue to convey the historical past: “*I remember getting on that bus and just layers of feelings and how important it was*” (Neil King, survivor of Minidoka, The Origin Story of the Minidoka National Historic Site: <https://www.youtube.com/watch?v=rwFKmOwvyXM>). Another survivor, Anna Tamura, noted:

For many people, for many people who are on that bus and who came out on the pilgrimages it was their first time going back to the site that they had been incarcerated at. So, you know almost 70 years later, and you know, it's so emotional and healing. And for their descendants to learn about their-their parents or their grandparent's histories, its um, uh that's why I think emotions are so strong [Anna Tamura, The Origin Story of the Minidoka National Historic Site: <https://www.youtube.com/watch?v=rwFKmOwvyXM>].

These testimonies from the Japanese American descendant community showcase an actively maintained relationship to place. The excerpts above, along with a wealth of other ethnographic source material, indicates that there remains a strong relationship between the Minidoka property and the community's core values, history, and heritage. Although some development has occurred in the area, and some of the land within the TCP has now been privatized, the Japanese American descendant community's connections to Minidoka remain strong. The property continues to be a deeply meaningful and important historical place returned to each year by descendants. Accordingly, an integrity of relationship appears to be present.

There are generally two aspects of integrity that fall under the National Register Bulletin 38 umbrella term “integrity of relationship.” These two aspects of integrity – integrity of feeling and integrity of association – are discussed in more detail below.

Integrity of Feeling is one best expressed by testimonies from incarcerated and their descendants, although many can likely experience some of what Minidoka may have felt like. This sense of feeling “is evoked by the presence of physical characteristics that reflect the historical scene” (McClelland et al. 1999:23). Integrity of feeling naturally dovetails with other elements of integrity, in that they all work together to convey a sense of time or place (McClelland et al. 1999:23). The concept of “feeling”, then, is a place's expression of the aesthetic or historic sense of a particular period of time. The Minidoka property embodies and evokes this sense of the historic era both through the historic barracks and other buildings as well as through the expansive viewshed, serving to evoke feelings of isolation and remoteness that are a major part of the property as one descendant of a Minidoka incarcerated, Paul Hiroyoshi Tomita, described:

On June 5, 2022, for the first time, I was able to walk on the actual location/ground where our family was imprisoned during the war...some 80 years ago. As I have expressed several times through the years, I did not like being in the Minidoka/Hunt Camp. The dust was unbearable; the wind was relentless and the imprisonment was inhumane [Friends of Minidoka 2022b]

Speaking of the property and its ability to instill this feeling of remoteness and isolation, Clarke Kido, a third generation Japanese American and descendant of an incarcerated, stated: “*The remoteness, weather, unmitigated wind, high desert terrain, limited traffic and even the lack of*

improvements added to my visitor experience" [Excerpt from a comment letter by Clarke Kido to the BLM Shoshone Field Office, dated Tuesday, October 19, 2021]. Because Minidoka, in large part through its impressive, unobstructed viewshed, continues to evoke this sense of isolation, integrity of feeling remains intact.

Integrity of Association is present when a property has the ability to reflect or in some way convey the historic events and activities that shaped it (McClelland et al. 1999:23). For example, "continued use and occupation help maintain a property's historic integrity if traditional practices are carried on" (McClelland et al. 1999:23). In the case of the Minidoka property specifically, there is a clear continuation of association with the property evidenced through the annual return of Minidoka incarcerated descendants to commemorate and memorialize those imprisoned there, to the various events held at Minidoka like the recently held *80 Years of Reckoning: The Lessons and Legacy of Minidoka* with multiple guest speakers, to the regular publications and testimonies about the descendant community's visitor experience (e.g., see Friends of Minidoka blog).

4.2.2 Integrity of Condition (Location, Design, Setting, Materials, and Workmanship)

In terms of *Integrity of Condition*, Bulletin 38 warns that "a property that once had traditional cultural significance can lose such significance through physical alteration of its location, setting, design, or materials," adding that "in some cases, a traditional cultural property can also lose significance through alteration of its setting or environment" but a property may still "retain its traditional cultural significance even though it has been substantially modified (Parker and King 1998:12). This is because cultural values, belief systems, and other traditional practices are dynamic, and can adapt to change. Critically, it should be underscored, just because beliefs and practices may accommodate change doesn't necessarily mean they are any less integral to a group's ongoing relationship to a place. Addressing this, National Register Bulletin 38 specifies that "the integrity of a possible traditional cultural property must be considered with reference to the views of traditional practitioners; if its integrity has not been lost in their eyes, it probably has sufficient integrity to justify further evaluation." And, even more critically, "some kinds of traditional cultural significance also may be retained regardless of how the surroundings of a property may be changed" (Parker and King 1998:12).

Minidoka has certainly been impacted by the slow march of time. Although some restoration efforts have been undertaken, largely for interpretive purposes, many of the original buildings and structures are no longer present in their entirety or at all. In fact, some Park staff were unaware of certain locations, as Emery Brooks Andrews discovered during a visit:

Yes, after that we drove out to an area where the bridge goes across the Snake River. And there was a visitor's center there. And, so, I went in there and talked to an elderly gentleman there and told him I was... talking about the camp at Minidoka and where that was and wanted to know if he could help me find it.

And he asked somebody else there and he really said, "Well, it's across the river there somewhere and you, one of those roads you go down, you'll probably find it out there somewhere." And I'm not, and I categorized him maybe unfairly, but I thought, here's a World War II veteran and he's not gonna be real helpful to me.

'Cause I would think that he would know where the camp site was. Anyway, he gave me some general area where it would be, so drove across the bridge and went, took two or three roads to go down for a while before we found it. But we found it. And at that time, it was before the National Park Service made it a historical site, so there wasn't much there. There's a large, there was a large wooden sign on the road giving a brief history of the camp site and so I turned off the road and went up the road that led into the camp. And it was like everything came back to me. Just, even though it was flat, there was nothing there except the stone foundation for the guardhouse and the waiting room. And the irrigation canal is still the same, same little bridge you go, drive across it to get across the canal into the gate there.

And also, there beside the existing foundation there is a, there is a, three memorial plaques in bronze. One tells a brief history of the camp, one is a map of the camp, and the third one is a list of some of the people that died in the camp there, not 442, but residents in the camp. And I could see, what I know now is, I think, is the root cellar that was at the camp there. There's a broken-down wooden building there in the ground. But now it's farmland. And I could close my eyes and see everything at the camp there because I've been there. And it was, it was an exhilarating experience for me to do that [Andrew, Emery Brooks. "Emery Brooks Andrew Interview." by Tom Ikeda. Denso Visual History Collection, Denso Digital Archive. Denso. March 24, 2004. <https://ddr.densho.org/media/ddr-densho-1000/ddr-densho-1000-155-transcript-978189efdc.htm>].

Additionally, it is without question that the Minidoka TCP contains some more recent impacts, developments, and modern intrusions. The proliferation of farms since the days of Minidoka has certainly impacted the historic character of remoteness and desolation, as one Minidoka incarcerated noted during an interview:

Very hot and dusty but that's the thing, I kept telling my kids and grandkids how we're sitting in the middle of all this sage country and dusty and then a couple years ago my daughter and a couple grandkids went to the pilgrimage from Seattle tracing by bus back to Minidoka, and that took a full day. We got on the bus early in the morning and we didn't get there until late evening. And then we went to the camp site and here it's all farmed by Caucasian farmers now and all fields, it was nothing like when we were there. And, so, it was hard... I was telling them how arid and all and it wasn't nearly – we had a big, they called it a main canal, irrigation, more like a river than a canal, and it ran right alongside – that's how the main, you had to go over a bridge to get into camp and so they had the barbed wires so you had to cross the canal to really get away from there [Maeda, Don. "Don Maeda Interview" by Carolyn Nayematsu. Twin Cities JACL Collection, Denso Digital Repository. Denso. October 13, 2013. <https://ddr.densho.org/media/ddr-densho-1014/ddr-densho-1014-15-transcript-9947c55625.htm>].

However, even with these changes, the Minidoka area continues to convey its historical significance to the Japanese American descendant community; the integrity of condition remains

strong enough and intact enough to convey its historical narrative and the experience of the incarcerated. Even though there are now nearby farmlands, the expansive, unobstructed viewshed still conveys this sense of isolation and remoteness, an important aspect to the historic integrity of Minidoka.

There are generally several aspects of integrity that fall under the National Register Bulletin 38 umbrella term “integrity of condition.” These aspects of integrity – integrity of location, integrity of design, and integrity of setting – are discussed in more detail below. In some cases, as applicable, TCP and National Register assessments may also include discussions of an integrity of materials and integrity of workmanship; for this TCP report, these two aspects are briefly included.

The Integrity of Location refers to “the place where the significant activities that shaped a property took place” (McClelland et al. 1999:22). In other words, the location is the place where the historic property was built and/or where the historic event(s) occurred. The setting and location of Minidoka, with its isolation, openness, and distance from the Pacific Coast, are characteristic of the WRA’s site selection criteria. The camp was a hastily constructed, large-scale temporary facility that became densely populated with over 9,000 people at one time. It was typical of WRA camps constructed during World War II (NPS 2006:51–52).

The Minidoka TCP, which encompasses the full area of the Minidoka concentration camp infrastructure, agricultural fields, canal, and viewsheds, is where the camp was built and where incarcerated experience the trials and tribulations of life at Minidoka. It therefore retains a strong integrity of location as the original place of incarceration; it is the location where stories are told of the trauma, the sense of isolation, and heart-wrenching despair, but it is also home to the stories of perseverance, hope, strength, and the overcoming of great adversity.

Integrity of Design can be defined as “the composition of natural and cultural elements comprising the form, plan, and spatial organization of a property” (McClelland et al. 1999:22). In the case of TCPs and other such cultural properties, design can encompass the broad spectrum of spatial relationships among landscape or geological/geomorphological elements (McClelland et al. 1999:22). With this perspective, a property may have an integrity of “natural” design if these elements still convey the properties historic significance. Although fundamental changes in land use can affect this element of integrity, this is not always the case, particularly if historic use patterns continue (McClelland et al. 1999:22). In the case of the Minidoka area, although there has undoubtedly been development, the relationship between the Japanese American descendant community and the physical environment and natural landscape elements are intact – those remaining buildings, structures, and expansive, unobstructed viewsheds – are all present. The natural design of the site remains strong for Japanese American descendant community members who ascribe value to it. As one descendant stated, the “echoes of the past” are still present at Minidoka:

...[The] pilgrimages to these sites united me with my ancestors and culture. Stepping onto the land, I can better understand what my father and his family experienced. The intentional desolation and isolation comes through. I feel the echoes of the past [Excerpt from a comment letter by Michael Tanaka to the BLM Shoshone Field Office, dated Friday, October 22, 2021].

Similarly, the Integrity of Setting is defined as the ability for the physical environment surrounding and including a property to convey the character in which it played its historic role (Andrus and Shrimpton 2002). The “setting”, then, is the multivalent and multilayered context of the historic place, including its surrounding physical, visual, auditory, and/or olfactory environment. Although development and modern intrusions undoubtedly impact the site, the Minidoka property continues to convey much of its historic setting. The setting for the incarcerated was expressed as dry, dusty, windy, and far away from the modern world; a remote and desolate place that an expansive, unobstructed viewshed which instilled this strong sense of isolation: “...I looked out and I saw that desolate, desolate place ... I couldn't believe what, where we were at ...” (“Art Abe Interview,” by Tom Ikeda. Densho Visual History Collection, Densho Digital Archive. Densho January 24, 2008. <https://ddr.densho.org/media/ddr-densho-1000/ddr-densho-1000-206-transcript-ca077fc2db.htm>).

Recalling his time at Minidoka, George Takigawa, a Minidoka inmate, stated:

I think that all of our hearts fell when we saw Minidoka. It was a desert in the middle of a God forsaken country. My first reaction was 'who in the hell ever conceived the idea' to build a camp in such a desolated place like this? It was a very discouraging way to start out our relocation life but people become adjusted to anything and they set to work to make improvements right away [George Takigawa, interview by Charles Kikuchi, October 1943, 65–66, JAERDA BANC MSS 67/14 c, folder T1.94, available at https://encyclopedia.densho.org/Minidoka#cite_note-57].

In an interview, another of the first incarcerated exclaimed: “...everything was flat and dry and hot ... Wow, what a place. It's a dust storm” (Dan Hinatsu Interview” by Betty Jean Harry. Oregon Nikkei Endowment Collection, Densho Digital Archive. Densho. March 7, 2014. <https://ddr.densho.org/media/ddr-one-7/ddr-one-7-60-transcript-27751b15aa.htm>).

Yet another incarcerated stated: “...it was pretty dusty and hot, and it was kind of like a God-forsaken place that we landed up in” (Victor Ikeda Interview” by Richard Potashin. Densho Visual Archive Collection, Densho Digital Repository. Densho. November 6, 2007. <https://ddr.densho.org/media/ddr-manz-1/ddr-manz-1-23-transcript-8f69d5e15b.htm>).

In large part, this arid, remote setting still remains intact today, instilling this same sense of isolation first expressed by the incarcerated. Speaking to the importance of the expansive, unobstructed viewshed, Robyn Achilles, descendant of the WWII-era concentration camps, expressed:

Survivors and descendants of those incarcerated at Minidoka also tell stories of the land and environment both of challenges faced as well as how they sought strength from the surrounding land and nature. Many are familiar with the stories of inordinate amounts of dust, the frigid winters and extreme summer heat, the mud around camp, layered on top of the emotional and physical toll of the poor living conditions of mass incarceration. There are also reflections about the beauty of butterflies they saw and their symbolic freedom to fly beyond the barbed wire fences unlike the incarcerated, the local snake used to replace eel for the Japanese unagi dish, or the perseverance of incarcerated to farm

Japanese vegetables and provide some comfort to those in the concentration camp ... this unconstitutional mass forced removal and incarceration extends beyond the footprint of the concentration camp. There lies a deep significance of how the environment and land was a multifaceted part of this story of a violation of civil liberties in our country [Robyn Achilles, personal communication, 2022, emphasis added].

Another descendant spoke directly of the environmental setting's ability to still convey that sense of isolation and remoteness critical to the historic character of the Minidoka TCP:

Both my maternal grandparents were incarcerated during World War II as small children. My grandmother was incarcerated with her mother and siblings at Minidoka and my grandfather was incarcerated at Tule Lake with his parents. I have had the privilege of attending the Minidoka pilgrimage hosted at the Minidoka National Historical Site twice. Both times I was deeply affected by visiting the actual site where my grandmother and her family were forcibly incarcerated. The isolation and remoteness of the site drove home that deep injustice that occurred there and gave me space to reflect. It was only possible to truly imagine my great-grandmother arriving to the high desert of Idaho from rainy Alaska with a baby and three children and no idea what the future holds was only possible by being at the site.

The environmental setting of Minidoka creates a space of solemnity and allows survivors of the concentration camps and descendents [sic] of survivors, such as myself, to reflect on the past and find healing. It is essential to maintain this solemnity to commemorate the survivors of the forced removal and unjust incarceration during World War II...

It is a dark chapter in our history, and has had lasting effects beyond the War. Maintaining the site of Minidoka in its current state of solemnity and isolation allows visitors to contextualize the history in the place it occurred [Excerpt from a comment letter by Maya Abo Dominguez to the BLM Shoshone Field Office dated Wednesday, October 20, 2021].

Another descendant, Eleanor Nakayama, a Gosei (5th Generation) Japanese American, stated:

I was able to visit Mindoka in 2019 and saw what my great grandparents, Kiyoko and Katsumi Nakayama and great aunt, Joni Kimoto, who were brought on trains with blacked out windows so they couldn't see where they were going, first saw this unknown place. They were met with barbed wire, and the vast Idaho desert, flat and barren with dust storms and frigid nights. This landscape is an integral part of how this history is told, for the visitors to be able to step into the conditions that were forcibly put upon Japanese Americans [excerpt from a comment letter by Eleanor Nakayama to the BLM Shoshone Field Office, dated Wednesday, October 20, 2021].

Although the setting now includes more visible farmland, this, too, is a characteristic of Minidoka. As Robyn Achilles expressed:

Incarcerees cleared the land, created lateral irrigation canals, and raised and harvested crops. When the war ended, returning veterans were allowed to enter a lottery for homesteads on the land that the incarcerated cleared and farmed, but Japanese American soldiers were barred from the lottery, an additional act of discrimination for those who fought for their country while their families were in concentration camps.

The farmland setting – the legacy of those incarcerated at Minidoka – interspersed and encircled by the surrounding high desert environment continues to convey the historic character to visitors, and especially the Japanese American descendant community.

The Integrity of Materials can also apply to TCPs and traditional landscapes. Within this aspect of integrity, “materials” are usually defined as the physical elements that were used, combined, or deposited during a particular period of time and in a particular pattern or configuration to form the historic place. Integrity of materials generally means that the place should be made or constructed using whatever was normally and traditionally used. In the case of a landscape, for example, this would be the soil and plants; in the case of the built environment, this is often wood, stone, or other building materials. Because much of Minidoka fell into disrepair and many of the original buildings no longer exist, this aspect of integrity is unquestionably impacted. There are still some original structures associated with the concentration camp – the lone lava rock chimney tower and portions of a building wall that remained standing, for example, as well as some of the building foundations, a rock garden, fire station, and other constructions. Additionally, some standing structures remain in the agricultural fields first cleared and planted by the incarcerated.

Although many of the buildings and structures may no longer have integrity, the landscape itself – the soil, surrounding agricultural fields first developed by the incarcerated, and the plant life characteristic of the sagebrush steppe – are still present. These “materials” of the landscape – both the natural landscape characteristic of the high desert sagebrush steppe region and the overlying cultural landscape of agricultural fields – retain historic integrity to those Japanese American descendants:

The location beyond the footprint of the concentration camp served as a prison for the Japanese Americans. Many oral histories of survivors comment on how the barbed wire was intended to keep them from escaping, but it was the location in remote Idaho that prevented anyone from escaping. There are editorials, visual art, and poetry describing the viewscape and the environment, both of which are vital for people today to understand the experience of incarcerated.

People argue that there are farms that did not exist when incarcerated arrived, thus the landscape has already been altered. However, these farms and the valley’s agricultural might are an important legacy of the work of Japanese Americans while confined at Minidoka. Hanako Wakatsuki-Chong, former Director of Interpretation and Education at Minidoka National Historic Site, once told me, “By turning the arid land into productive agricultural lands through laterals from the canal, Japanese Americans helped make the Magic Valley ‘magical’, and we see the legacy of their work today [Robyn Achilles, personal communication, 2022].

Indeed, many of the surrounding agricultural lands remain fields of sugar beets, a staple and ongoing legacy of the Minidoka incarcerated in the Magic Valley. As was noted previously, the sugar beet was in fact saved in no small part by the efforts of the Minidoka incarcerated who farmed the sugar beets beginning in 1942 (Friend of Minidoka n.d.; The Minidoka Irrigator 1942a). Given that these agricultural fields and the sagebrush steppe landscape retain many of the same characteristics, an integrity of materials is still present. Notably, the presence of these materials – the sagebrush steppe and agricultural fields – are a character defining component of the viewshed.

Finally, Integrity of Workmanship can be defined as the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. In other words, it refers to places that have been built or modified by intentional human action. Again, much of Minidoka's buildings and structures, some of which were even built by incarcerated, fell into disrepair for decades after WWII. Although some outlying structures remain associated with the agricultural fields, much of the original buildings and associated structures are no longer present. This aspect of integrity, defined as places where modification through intentional human action has occurred, again can be applied to the agricultural fields, many of which were first cleared, plowed, irrigated, and developed by incarcerated. Although land ownership, specific crops, and other natural changes associated with farmland management has undoubtedly occurred, these agricultural fields *are still* agricultural fields. The workmanship associated with creating the agricultural landscape continues and is still very much present.

4.3 STEP 3: Evaluate the Property with Reference to the National Register Criteria

Having established that the Minidoka property qualifies as a TCP and that this deeply important historical place retains both integrity of relationship and integrity of condition, it is our opinion that the Minidoka TCP is eligible for the NRHP under 36 CFR 60.4. There are four criteria of eligibility to the NRHP. A property needs to meet at least one of the four criteria to be eligible for listing. This study recommends that the Minidoka property is likely eligible under the following criteria:

Criterion A: Association with events that have made a significant contribution to the broad patterns of our history.

As a WWII Japanese American concentration camp, the Minidoka TCP is directly associated with events that have had a major impact within American history. The forcible relocation and imprisonment of thousands of first and second-generation Japanese Americans at Minidoka (and the other WWII concentration camps) impacted the lives of countless Japanese Americans, and continues to impact their lives today. Their story, one that continues to be told and further contextualized today, is a significant contribution to the broad patterns of American history.

Although a Nation should undoubtedly celebrate its accomplishments, it should also learn from its failures. The story of Minidoka is one such failure, the failure of a Nation to treat its citizens and populace with respect and dignity, and the failure to uphold civil and human rights. These lessons and the stories of trauma, loss, and devastation that accompany this failure, are just as applicable today as they were 80 years ago. Their stories are a powerful and poignant reminder that a much darker side exists within American history, one that should never be forgotten so that it will never again be repeated:

I am a third-generation Japanese American (sansei). My father and his entire family were incarcerated at Minidoka. The incarceration of American citizens solely because of their race is one of the low points of American history. Historic sites, like Minidoka, help ensure that this history is not repeated [Excerpt from a comment letter by Michael Tanaka to the BLM Shoshone Field Office, dated Friday, October 22, 2021].

Criterion B: Association with the lives of persons significant in our past.

The Minidoka TCP is associated with the lives of multiple historically significant people, many of whom were heavily influenced by their experiences at the Minidoka concentration camp. Although not a comprehensive list, some of the individuals significant to the Japanese American community and the wider American populace include:

- Paul Chihara (born 1938), an American composer;
- Ken Eto (1919–2004), a Japanese American mobster with the Chicago Outfit and eventually an FBI informant;
- Fumiko Hayashida (1911–2014), an American activist who was also incarcerated at Manzanar;
- Shizue Iwatsuki (1897–1984), a Japanese American poet. Also incarcerated at Tule Lake;
- Taky Kimura (1924–2021), a martial arts practitioner and instructor. Also interned at Tule Lake;
- Joseph Kitagawa (1915–1992), professor at the University of Chicago;
- Fujitaro Kubota (1879–1973), an American gardener and philanthropist;
- Frank Kunishige (1878–1960), a well-known pictorialist photographer and a founder of the Seattle Camera Club. Also detained at Camp Harmony;
- Aki Kurose (1925–1998), a Seattle teacher and civil rights activist;
- Dr Kyo Koike (1878–1947), a respected surgeon and poet, who also was a noted photographer and a founder of the Seattle Camera Club;
- John Matsudaira (1922–2007), an American painter;
- Mich Matsudaira (1937–2019), an American businessman and civil rights activist;
- Shig Murao (1926–1999), a San Francisco clerk who played a prominent role in the San Francisco Beat scene;
- William K. Nakamura (1922–1944), U.S. Army soldier who received the Medal of Honor;
- George Nakashima (1905–1990), a Japanese American woodworker and architect;
- Mira Nakashima (1942), an architect and furniture maker;
- Kenjiro Nomura (1896–1956), a Japanese American painter;
- Frank Okada (1931–2000), an American Abstract Expressionist painter;

- John Okada (1923–1971), a Japanese American writer;
- James Sakamoto (1903–1955), a journalist, boxer and community organizer;
- Bell M. Shimada (1922–1958), an American fisheries scientist;
- Roger Shimomura (born 1939), an American artist and Professor of Art;
- Monica Sone (1919–2011), a Japanese American novelist;
- Gary A. Tanaka (born 1943), a Japanese American businessman;
- Kamekichi Tokita (1897–1948), a Japanese American painter and diarist;
- Herbert T. Ueda (1929–2020), an American ice drilling engineer;
- Newton K. Wesley (1917–2011), an optometrist and early pioneer of the contact lens;
- Kenji Yamada (1924-2014), a two-time U.S. National Judo champion;
- Mitsuye Yamada (born 1923), a Japanese American writer;
- Takuji Yamashita (1874–1959), an early 20th-century civil rights pioneer. Also interned at Tule Lake and Manzanar; and
- Minoru Yasui (1916–1986), a Japanese American lawyer who challenged the constitutionality of curfews used during World War II in *Yasui v. United States*.

These listed individuals, all of whom have had an impact upon the history of the United States, are highly esteemed and/or noteworthy individuals within the Japanese American community and the wider U.S. populace. Their accomplishments, in some cases inspired and colored by their experiences at Minidoka, hold special significance within the history of the United States.

Criterion C: Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

A place may be regarded as representing a significant and distinguishable entity, even if many of its parts appear to lack individual distinction to the casual observer. These parts, when considered holistically, may represent a larger entity of traditional cultural importance—in other words, a traditional cultural *district*. A TCP may be a district if it possesses a significant collection of buildings, structures, sites, or objects united historically by intentional plan, physical development, or traditional beliefs, customs, and practices. Many TCPs are landscapes with many components—hills, springs, rock outcrops, plant communities, former habitation sites—and may be considered districts under Criterion C, although they are usually eligible under Criterion A as well, and they may be classified as sites rather than districts, particularly if they are comprised mostly of natural resources.

In this case, the Minidoka TCP is a district with multiple important, character-defining components: the Minidoka national monument itself, but also the surrounding viewsheds defined by the rolling hills of sagebrush, the many rock outcrops, the peaks, and other elements that compose and characterize the sagebrush steppe landscape.

Criterion D: Has yielded, or may be likely to yield, information important in prehistory or history.

Ethnographic and archaeological studies have yielded information important to the history of the area. Future studies of the area will likely yield more information about the significance of both the Minidoka National Historic Site specifically, and the surrounding area generally.

- Previous archaeological investigations have yielded historic-era material associated with the concentration camp that can serve as an important interpretive tool to understanding the history of this historic site. There is also a strong likelihood that additional archaeological investigations would have the potential to yield further information important to the history of the site. Visitors, like Lisa Shiosaki Olsen, for example, have testified to the discovery of surface artifacts, and remembers seeing many scattered along the ground when visiting the Minidoka concentration camp:

My Minidoka story started as a child playing in the consecrated dust of Minidoka while my father, Jun Shiosaki, and Uncle Hero Shiosaki met with members of the legislature to recognize Minidoka on the National Registry. I would dig through the dirt and remember finding rusted salt and pepper shaker lids along with rattle snake skins. The landscape was bleak and desolate... [comments submitted by Lisa Shiosaki Olsen, https://docs.google.com/document/d/1izFB86lafn-nlv1nyviJXINf_Exv8 JKuC1pudPUYIXc /edit?usp=sharing].

- Ethnographic and oral history studies about Minidoka are numerous, showcasing the depth and wealth of information tied to this important historical site. More than likely, additional ethnographic studies would yield new and important information about the cultural and historic significance of the area.

4.4 STEP 4: Determine Whether any of the National Register Criteria Considerations Make the Property Ineligible

The NHPA federal regulation 36 CFR 60.4 “Criteria for Evaluation” further stipulate that:

Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible for the National Register.

The Minidoka TCP does not fall under any of these criteria considerations, and is therefore recommended to be eligible under criteria (a), (b), (c), and (d) as listed above. However, even though none of the criteria considerations apply, they are still discussed further below:

Consideration A: A religious property deriving primary significance from architectural or artistic distinction or historical importance.

- The property is not used for religious purposes.
-

Consideration B: A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event.

- There are no known contributing properties that have been relocated to be within the TCP.

Consideration C: A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his productive life.

- Because it was a concentration camp, it is both a birthplace and a grave site, however this is not the property's sole or main significance.

Consideration D: A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events.

- As a property associated with the Japanese American incarceration experience where death did occur, the property does have a cemetery. However, the property does not derive its primary significance from these graves, many, if not all, of which were relocated.

Consideration E: A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived.

- Not Applicable.

Consideration F: A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance.

- Not Applicable.

Consideration G: A property achieving significance within the past 50 years if it is of exceptional importance.

- Minidoka is a property that has been significant to the Japanese American descendant community since its use as an incarceration site during the forced removal that occurred in the 1940s during the onset of WWII. Therefore, the property holds historic significance to the Japanese American descendants for much longer than 50 years. Additionally, although outside of this report, the area likely holds layers of historical and cultural significance to the Shoshone-Bannock Tribe and other tribal communities.

5.0 Connections to Areas of Critical Environmental Concern

Through the Federal Land Policy and Management Act (FLPMA), Congress declared that it is the official policy of the U.S. Government to manage all public lands "in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; [and] that, where appropriate, will preserve and protect certain public lands in their natural condition" (43 U.S.C. § 1701(8)).

To carry out this policy, FLPMA requires BLM to “give priority to the designation and protection of areas of critical environmental concern,” or ACECs, in the development and revision of land-use plans (43 U.S.C. § 1712(c)). The statute defines an Area of Critical Environmental Concern (ACEC) as follows:

Areas within the public lands where special management attention is required (when such areas are developed or used or where no development is required) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards [43 U.S.C. § 1702(a)].

BLM’s ACEC Manual, a guidance document which helps direct and explain the ACEC nomination process, sets out more specific requirements for the designation and management of ACECs. It specifically requires that each area recommended for consideration as an ACEC, including those externally nominated, be considered thoroughly by BLM through collection of data on “relevance” and “importance.” The BLM manual and ACEC guidance documents define “relevance” as the presence of “a significant historic, cultural, or scenic value; a fish or wildlife resource or other natural system or process; or natural hazard”. Additionally, “importance” requires “substantial significance and values” (43 C.F.R. § 1610.7-2(a)). Within the ACEC framework, importance generally requires qualities of more than local significance and special worth, consequence, meaning, distinctiveness, or cause for concern. Each area that meets the relevance and importance criteria must be identified as a potential ACEC and “fully considered” for designation and protection in resource management planning (BLM 1988).

The proposed boundary of the ACEC includes all BLM land within the historical boundary of Minidoka Concentration Camp, the Star Lake Grazing Allotment, the Sid Butte sage grouse setback, a portion of the Snake River Plain, and Wilson Butte/Wilson Butte Cave. While the environmental concerns which define this boundary exist across the entire area, adjacent areas of private land were excluded from the ACEC, except for owners who provided permission for the boundary to include their land (Algonquin Consultants, Inc. 2022) (see Figure 26). This boundary was drawn to protect that portion of the Minidoka viewshed that lies in closest proximity to the historical boundary and current National Historic Site boundary. However, Minidoka’s viewshed extends much further in all directions and it is this viewshed that informs the ACEC boundary. The sage-grouse setback is included in the larger ACEC boundary in recognition of the need to preserve this critical natural resource. Wilson Butte is also included in order to preserve the important site of Wilson Butte Cave. In addition to the natural resources, this boundary preserves the other archaeological sites and locations of cultural importance in the Snake River Plains area.

Algonquin also completed an ACEC Study report and nomination⁵ concurrent with this TCP Study that was submitted to the BLM, Twin Falls District Office. The ACEC nomination found that the BLM should establish the approximately 237,000-acre area surrounding the Minidoka Relocation Center as an Area of Critical Environmental Concern (ACEC). Minidoka and its vicinity represent a sensitive and culturally important site for the Minidoka descendant community. The landscape surrounding and incorporating Minidoka is also of significant national and historic importance, commemorating the experiences of incarcerated Japanese Americans during WWII.

⁵ Minidoka Area of Critical Environmental Concern, submitted by the Friends of Minidoka and Algonquin Consultants, Inc., to the BLM, Twin Falls District Office, in December 2022.

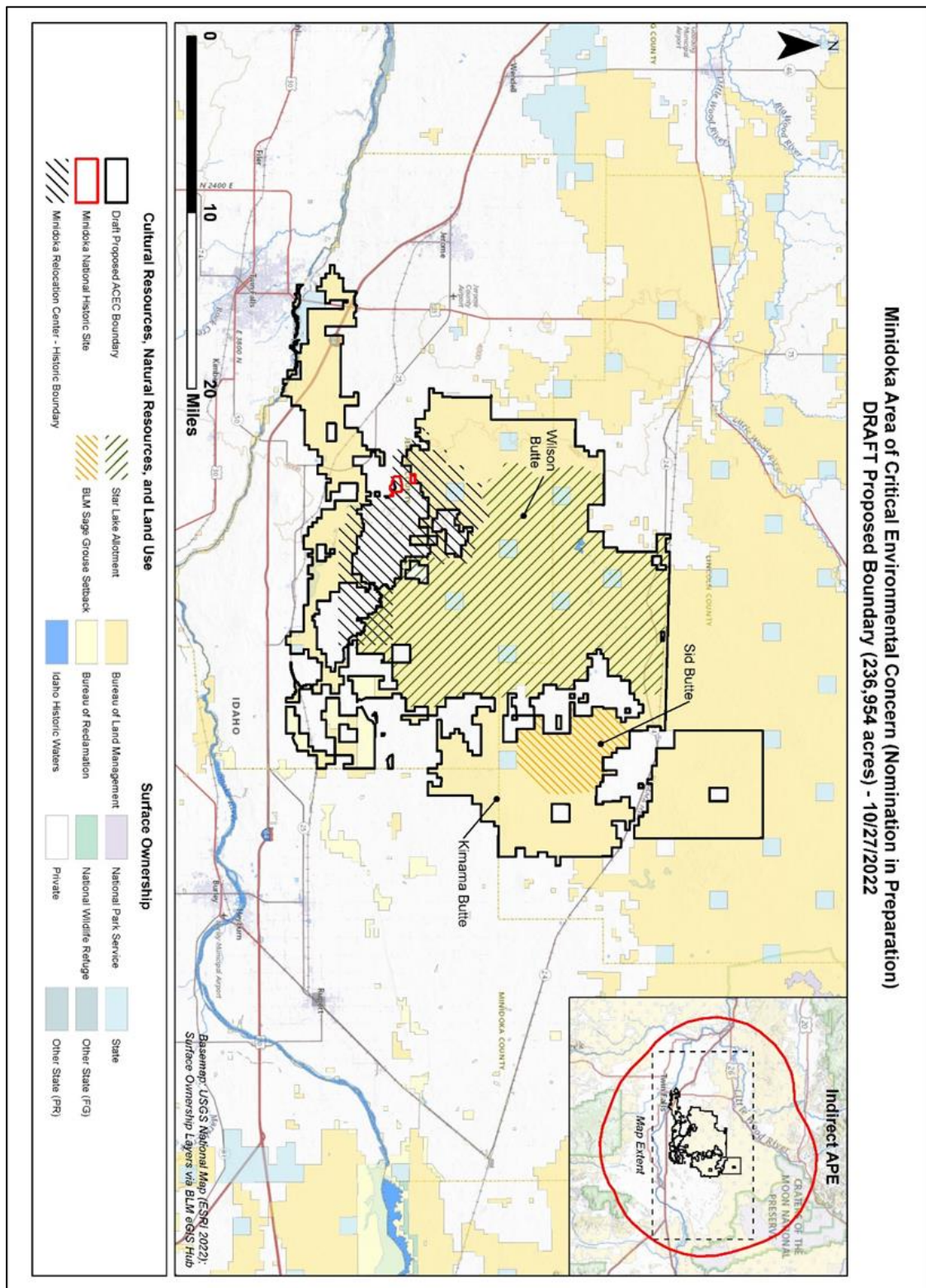


Figure 26: Proposed ACEC boundary as presented in the Nomination: Minidoka Area of Critical Environmental Concern (Algonquin Consultants, Inc. 2022).

Minidoka faces a severe threat from the proposed Lava Ridge wind project, which would negatively impact the qualities that make the site important to the descendant community. Further, the proposed ACEC includes Indigenous ancestral sites and essential habitats for endangered and migrating species. Overall, the proposed ACEC fits the criteria of relevance, importance, significance, and need for special management required by the BLM to establish an Area of Critical Environmental Concern.⁶

6.0 Connections to the National Environmental Policy Act

Although the discussion in this report has focused predominately on the NHPA and the framework established by its Section 106, NEPA has obvious connections to this TCP study. The discussion of “cultural resources” above is found within the NEPA regulations at 40 CFR 1508.27(b)(3) and (b)(8). Cultural resources include those historic features that are a part of the Minidoka National Monument itself, along with the many identified contributing elements detailed earlier in the report (i.e., the viewshed). Additionally, the Shoshone-Bannock Tribe has stated this area is highly significant and contains various gathered and regularly used resources. These many cultural resources are among the many factors that should be evaluated during an environmental impact statement (EIS) under NEPA.

7.0 Lava Ridge Wind Farm Project

The focus of this Study is to determine whether Minidoka, as defined and delineated in this report, qualifies as a TCP, and once determined, assess the property’s eligibility for listing in the National Register. With the case being made above that Minidoka is a TCP that retains enough of its historic integrity to be eligible for listing in the National Register, federal undertakings should consider project effects on this eligible traditional cultural district.

One such project is the Lava Ridge Wind Farm Project. Currently, Magic Valley Energy, LLC (MVE), is seeking authorization to use federal lands to construct, operate, maintain, and eventually decommission the Lava Ridge Wind Project. The project would comprise a wind energy generating facility and ancillary facilities located primarily on public lands administered by the BLM Shoshone Field Office (SFO) in Jerome, Lincoln, and Minidoka Counties. According to the BLM’s scoping document for the proposed Project, the wind farm “would consist of up to 400 wind turbines and associated infrastructure and a 500 kilovolt (kV) generation intertie transmission line that would interconnect at Idaho Power’s existing Midpoint Substation or at a new substation along the permitted northern portion of the Southwest Intertie Project (SWIP) 500-kV transmission line (SWIP-North)”, MVE proposes to locate all Project components within a series of siting corridors covering approximately 76,000 acres (BLM 2021:1).

The proposed Project runs through the Minidoka TCP’s expansive viewshed critical to maintaining the historic character of the site. The viewshed instills this sense of isolation and remoteness largely conveyed through the still undeveloped region. Many of the locations for the proposed wind turbines would be readily visible from many points within the heart of Minidoka TCP (see Figure 27), especially at the national monument itself which is already listed in the

⁶ U.S. Department of Interior Bureau of Land Management. Manual 1613. 29 September 1988. https://www.ntc.blm.gov/krc/uploads/360/5_1613_ACEC_Manual%201988.pdf

National Register. The proposed turbines would, in fact, be some of the largest ever constructed on land thus far, sitting at a height of 740 feet (see Figure 28).

Because the viewshed is such an important character defining feature of the Minidoka TCP, ensuring its preservation as an unobstructed viewshed is critical to the Japanese American descendant community, and indeed, all Americans who wish to understand the stories of this historic property. For many, the viewshed is an integral part of the visitor experience. Therefore, significant changes to this expansive, largely unobstructed viewshed would have negative consequences and adverse impacts to the integrity of the TCP. Speaking to this, Clarke Kido, a third generation Japanese American and descendant of an incarcerated, stated:

The physical presence of wind towers, roadways, operations and maintenance facilities, increased traffic, and transmission lines would have a negative psychological effect on the visitors and would totally dominate the landscape.” In his letter, he later added: “The mandatory warning lights for the Lava Ridge wind towers and infrastructure facilities would contribute substantial light pollution and ruin the dark sky experience ... it would drastically alter the visitor cultural experience and remoteness of the Minidoka National Historic Site [Excerpt from a comment letter by Clarke Kido to the BLM Shoshone Field Office, dated Tuesday, October 19, 2021].

Another descendant of an incarcerated, Holly Yasui, expressed in her comment letter to the BLM Shoshone Field Office:

A wind farm project of the scale proposed by the Lava Ridge investors, with towers higher than the Space Needle in Seattle and turbine blades the width of a 747 airplane, would destroy the sense of isolation, cut off from “civilization;” that characterized Minidoka then and today. That is an important part of visitors’ experience, to understand and perceive first-hand what it was like to be expelled to a lonely, primitive place like the Minidoka concentration camp [Excerpt from a comment letter by Holly Yasui to the BLM Shoshone Field Office, dated Sunday, October 17, 2021].

Janet Matsuoka Keegan, a descendant whose grandparents, aunts, uncles, and cousins were all incarcerated at the Minidoka Relocation Center, expressed these concerns about the project’s impact not only to the historic character of the site, but to its ongoing ability to provide healing, introspection, and catharsis:

If the wind farm were to be built as proposed, that feeling of reconciliation and resolve I experience at Minidoka would be transformed to more hurt and anger because it would forever disfigure the landscape, the view, the pastoral quality of the site. It would transform a sacred place, a place of healing into an unsightly field of enormous towers of steel, rotors, blades, maintenance roads, transmission lines, scar and forever damage the historical footprint of Minidoka ... And, the United States government would have, again, with the stroke of a pen, allowed this egregious act to be inflicted on my people [Excerpt from a comment letter by Janet Matsuoka Keegan to BLM Shoshone Field Office, dated October 18, 2021].

Undoubtedly, not only would the proposed Project pose potential threats to the viewshed and the historic character of the site, it would decrease the site's ability to convey important insights and lessons to the general public:

An important part of the educational experience of the Minidoka National Historic Site is the recreation of the sense of desolation and hopelessness that residents were forced to live with while in the camps. My concern is that construction of the wind farm so close to the site will seriously detract from that experience, and lessen the impact of the lessons to be learned from the illegal forcible relocation of American citizens [Excerpt from a comment letter by Rob Hikido to the BLM Shoshone Field Office, dated October 18, 2021].



Figure 27: The Lava Ridge Wind Farm Project wind turbine corridors (black shapes) encircled by the Indirect Effects APE (solid red line).

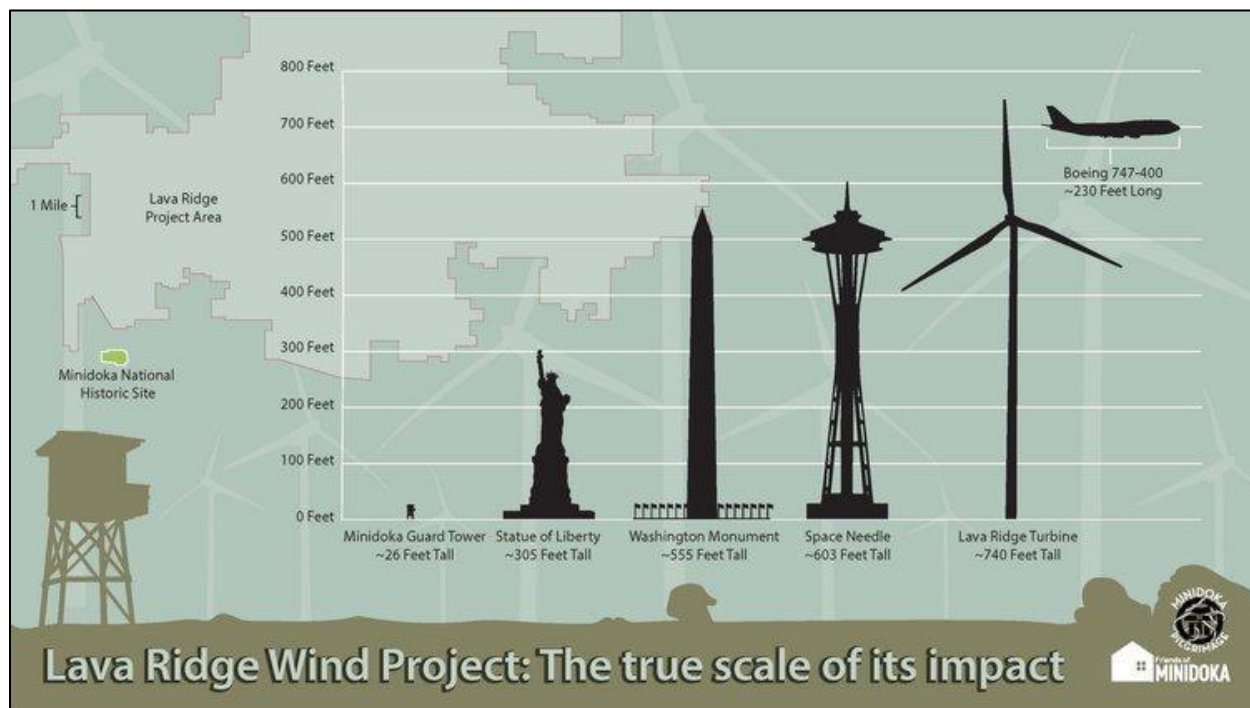


Figure 28: Lava Ridge Wind Farm scale of impact, courtesy of the Friends of Minidoka website: <https://www.minidoka.org/lava-ridge>.

Given all this, it is clear that the proposed Lava Ridge Wind Farm Project will have severe adverse effects on the character, significance and integrity of the TCP. The wind turbines, specifically, would obstruct the expansive viewshed that are an essential part of Minidoka’s historic character, conveying this sense of remoteness and isolation. It would also likely impact other cultural resources present within the area associated with the Shoshone-Bannock Tribe and possibly other Native American communities. The high potential for the wind farm project to continue a history of oppression should be avoided, as one WWII-era concentration camp descendant strongly articulated:

Kindly honor and respect the fact that this area is home for many Native Americans/American Indians and former “home” to thousands of persons of Japanese ancestry who were incarcerated at nearby Minidoka War Relocation Authority Camp (concentration camp). The Lava Ridge Wind Project needs to be situated in an appropriate location that will not harm, hurt, or oppress the population [Excerpt from a comment letter by Rita Takahashi to the BLM Shoshone Office, dated October 17, 2021].

8.0 Conclusions and Recommendations

This ethnographic study concludes that the Minidoka property qualifies as a TCP and is a historic property eligible for listing in the NRHP. The Minidoka TCP can best be described as a historic traditional cultural *district* that both retains integrity and is eligible for inclusion on the NRHP under criteria (a), (b), (c), and (d). Drawing from the historical and ethnographic research, this report suggested that the Japanese American descendant community’s history, heritage, and identity

are all intimately tied to the Minidoka TCP. Indeed, Minidoka remains a deeply important place to the descendant community, one that continues to define who they are today:

I was inspired by my parents to break the silence of the story of the incarceration. For many years, our friends and family did not talk about “camp” and if they did the focus was not on the emotional and physical difficulties they experienced. Many years ago, my parents were invited to talk to a Valley High School class taught by a friend of mine and I accompanied them. I realized then how important it is for us to learn the history of incarceration and the lessons we must learn from it [Janet Matsuoka Keegan, Friends of Minidoka, Treasurer, Twin Falls, ID].

The testimonies included in this report, and the countless others available in archives, documentaries, and publications, showcase the loss, devastation, and hardship experienced by those incarcerated. The testimonies also demonstrate that this trauma is still poignantly felt today by descendants and the wider Japanese American community. It is for this very reason, among others, that Minidoka’s preservation – particularly those elements that contribute to its historic character – is so critical. Even though Minidoka, as a WWII-era concentration camp, may be a dark stain upon American history, it is also a place of historical interpretation and healing. It is a place where descendants, and all Americans, visit to learn, commemorate, and hear the stories of those who were imprisoned there. For many descendants, this creates an opportunity to begin healing their long-held multigenerational trauma. Without question, Minidoka qualifies as a place of negative heritage, but it is for that very reason the story of Minidoka must be told and the historic character of Minidoka preserved; doing so will help ensure that such events will never, ever happen again.

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