



October 20, 2021

Mr. Kasey Prestwich
Project Manager
BLM Shoshone Field Office
400 West F Street
Shoshone, ID 83352

COMMENTS SUBMITTED ELECTRONICALLY

Dear Mr. Prestwich:

On behalf of the Friends of Minidoka, I am writing to submit comments regarding LS Power's proposed Lava Ridge Wind Project and to ask that Bureau of Land Management suspend the development of a draft environmental impact statement and go back to square one to develop a revised proposal consistent with racial and environmental justice and our nation's commitment to National Parks.

LS Power's August 2021 proposal and BLM's process failed to follow Biden Administration policies to engage with environmental justice communities early in the planning process and runs counter to the Administration's goals for racial and environmental justice. By restarting the planning process and engaging with the Japanese American community from the beginning, the BLM will help the Administration achieve multiple goals relating to renewable energy, racial and environmental justice, and preserving our National Parks unimpaired for future generations.

The Friends of Minidoka is an Idaho-based non-profit organization. Our mission is to engage in and support education, research and historic preservation of the World War II incarceration experience at the Minidoka National Historic Site. We strive to pass on the history, legacy, and lessons of civil liberties through transforming and inspiring experiences for the general public and those with personal and familial ties to Minidoka. We work with the National Park Service (NPS) and other partners to accomplish these goals. Our members include Minidoka survivors, descendants, members of the Japanese American community, and individuals committed to telling Minidoka's stories.

For over 20 years, the National Park Service has managed Minidoka National Historic Site to tell the painful stories of the forced incarceration of Japanese Americans during World War II, along with how camp survivors overcame challenges in camp, as well as the military service of over 1,000 men from Minidoka, 73 of whom were killed in action.

Minidoka is a place to heal deep emotional trauma, educate the public about racial injustice, commemorate our ancestors, and celebrate our community through annual pilgrimages and visits to the park. Because of its location and lack of visual intrusions, Minidoka retains a sense of isolation and

remoteness and enables visitors to the park to better understand the lives of camp survivors. To many survivors and descendants from all of the incarceration sites, Minidoka is sacred ground.

We were surprised and shocked to see BLM's Notice of Intent in the Federal Register on August 20, 2021. Prior to this NOI, the only contact we had from BLM was a July 2021 invitation to attend a meeting. We were especially surprised by the lack of engagement prior to the NOI in light of LS Power's unsuccessful attempt in 2009 to locate the Southwest Intertie Project (SWIP) 500 KV power line over Minidoka National Historic Site.

We strongly oppose the Lava Ridge proposal. It is too close to the park and would dishonor our nation's commitment to acknowledging that the incarceration was wrong and preserving sites of incarceration unimpaired for future generations. LS Power's Lava Ridge proposal includes:

- 400 wind towers, 340 of which would be visible from the park's new visitor center.
- 14 towers located on the historic footprint, including within two miles of the park.
- Each tower could be as tall as 740 feet, which is taller than the Seattle Space Needle, with turbine blades exceeding the wingspan of a Boeing 747. These proposed towers would exceed the height of any existing towers in our country.
- Creating a visual wall of towers and spinning blades that would dominate 114 degrees, or approximately one third of the park's 360 degree viewshed.
- Noise, light and other significant impacts on the park and other resources.

If approved, LS Power's proposal will serve as an affront to the Japanese American and Asian American Pacific Islander (AAPI) communities and mark a step backward in the U.S. Government's commitment to acknowledging Japanese American and AAPI contributions to our nation's history.

1. LAVA RIDGE PROPOSAL VIOLATES BIDEN ADMINISTRATION PROCESS AND POLICY GOALS

In 2020, President Biden ran for President on four pillars: Fighting climate change; Advancing racial justice; Creating jobs; and Defeating the pandemic. As expressed through multiple Executive Orders and policy statements in early 2021, President Biden stated his goals for clean energy **and** racial and environmental justice, along with process requirements to engage stakeholders in the process to ensure that Administration achieves both goals.

The purpose of early engagement is to ensure that the renewable energy proposals are sited in locations that avoid harming environmental justice communities, natural, cultural, and historic resources and other important goals. By requiring early engagement in the planning process, the Administration can achieve **both** its renewable energy and environmental justice goals by using a "smart from the start" approach for siting renewable energy projects.

Unfortunately, LS Power and BLM did not follow this process. They did not engage with Friends of Minidoka or other members of the Japanese American community in a meaningful way.

Because the location and size of the current proposal will dishonor the Japanese American community, the Friends of Minidoka will use every legal means to block the current proposal at every step in the process. Rather than "smart from the start," this project is broken from the beginning.

By overreaching and failing to engage with stakeholders, the Lava Ridge proposal jeopardizes the Administration's goals by generating political controversy, project risk and uncertainty along with delays from possible litigation.

In order to avoid a costly and time-consuming "train wreck" that will detract from the fight for racial justice and clean energy, we encourage BLM to "restart the clock" and follow Administration policy and the Secretary of the Interior's guidance relating to restoring integrity to the decision-making process. We ask that the BLM have meaningful engagement with the Friends of Minidoka and our partners to develop a new proposal that does not impair Minidoka's fundamental resources and values and other important natural, cultural, and historic resources. Meaningful stakeholder engagement involves providing the Japanese American community and other stakeholders with a seat at the table early in the planning process *before* scoping begins.

BLM manages 12 million acres of public land in Idaho and 48 million acres in Nevada. We are hopeful that BLM will be able to identify other sites in Idaho and in Nevada with fewer resource conflicts with stakeholders.

A. President Biden's Policies: Racial Justice and Climate Change Executive Orders

President Biden made his Administration's policies and priorities clear starting on day one. On January 20, 2021, President Biden signed Executive Order 13985 entitled "Advancing Racial Equity and Support for Underserved Communities through the Federal Government." In calling for a "whole-of-government equity agenda," President Biden stated an Administration goal to advance racial equity:

"...for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. Affirmatively advancing equity, civil rights, racial justice, and equal opportunity is the responsibility of the whole of our Government. Because advancing equity requires a systematic approach to embedding fairness in decision-making processes, executive departments and agencies (agencies) must recognize and work to redress inequities in their policies and programs that serve as barriers to equal opportunity."

The Racial Justice E.O. defines "equity" to include the Asian American Pacific Island (AAPI) community. Because the Japanese American community has received unequal treatment by the government and BLM is an agency in the federal government, this E.O. applies to BLM and its land management planning.

In carrying out the President's Racial Justice E.O., Secretary Haaland announced a Department of the Interior budget initiative in the President's Fiscal Year 2022 budget request.¹ Entitled "Promoting Racial Justice and Equity for Underserved Communities," the Department's FY 2022 discretionary request "...will embed environmental justice and racial equity goals into programs across the Department, with discrete investments in key areas. For example, the request includes an additional \$20 million to expand access to the over 70 national park units that preserve and tell the story of historically underrepresented and marginalized groups..."

¹ Statement by Secretary Haaland on the President's FY 22 Discretionary Funding Request: "Identifies Resources to Strengthen Tribal Nations, Promote Racial Justice and Equity, and Create Jobs in a Clean Energy Economy," dated 4/9/2021

The DOI's \$20 million racial justice initiative includes a proposed \$210,000 base budget funding increase for Minidoka to "... support operations and maintenance of the visitor center in order to provide quality visitor services ... The new visitor center, dedicated in 2020, is a significant part of the site's visitor experience."² We are grateful for the Secretary's support for additional staffing for Minidoka to ensure that the stories of people of color are told.

On January 27, 2021, President Biden issued Executive Order 14008, entitled "Tackling the Climate Crisis at Home and Abroad." The Climate Crisis E.O. states the goals of the Administration to reduce climate pollution and deliver environmental justice.³ The E.O. also states that: "[s]uccessfully meeting these challenges will require the Federal Government to pursue such a coordinated approach from planning to implementation, coupled with substantive engagement by stakeholders, including State, local, and Tribal governments." Emphases added.

To carry out this guidance from the President, Secretary Haaland issued Secretarial Order 3399, entitled a "Department-Wide Approach to the Climate Crisis and Restoring Transparency and Integrity to the Decision-Making Process." The Secretary's Order clearly requires BLM to engage with stakeholders early in the planning process, before a decision to prepare an environmental impact statement:

"Bureaus/Offices will proactively begin consultation with potentially impacted Tribes, both those currently in the proposed area and those with a historic presence, as well as engage potentially impacted environmental justice communities early in the project planning process. 'Early in the project planning process' includes when a Bureau/Office has enough information on a proposed action to determine that an environmental assessment or an environmental impact statement will be prepared." Section 5(C) Emphases added.

In addition to Executive and Secretarial Orders, the Biden Administration stated its goals through its American Jobs Plan released in March 2021. In the section entitled "Spur jobs modernizing power generation and delivering clean electricity," the Administration outlined several initiatives and stated: "[a]ll of this will be done while ensuring those facilities meet robust and rigorous standards for worker, public, and environmental safety as well as environmental justice – and all while moving toward 100 percent carbon-pollution free power by 2035." Emphases added.

B. Engaging with Impacted Environmental Justice Communities

With the exception of a July 2021 meeting relating to the National Historic Preservation Act (NHPA) Section 106 process, we are not aware of any direct outreach by BLM or LS Power to engage with Friends of Minidoka, our members, and the Japanese community at large. In response to LS Power's proposal, the BLM has an affirmative responsibility to reach out to stakeholders. BLM did not follow Administration policy or process guidance.

² See: NPS FY 22 "Greenbook" Budget Justification, p. Overview 12.

³ "It is the policy of my Administration to organize and deploy the full capacity of its agencies to combat the climate crisis to implement a Government-wide approach that reduces climate pollution in every sector of the economy; increases resilience to the impacts of climate change; protects public health; conserves our lands, waters, and biodiversity; delivers environmental justice; and spurs well-paying union jobs and economic growth, especially through innovation, commercialization, and deployment of clean energy technologies and infrastructure." Emphases added.

While the BLM and LS Power provided some public notice in the immediate project area in south central Idaho, we are not aware of any outreach to the Japanese American community located on the West Coast or nationwide before the August 2021 Federal Register Notice.⁴

Because of U.S. Government policy during World War II, which destroyed entire Japanese American communities on the West Coast and dispersed families across the country, Minidoka survivors and their descendants are located in communities across the United States. Densho, a Seattle-based non-profit organization, has chronicled this diaspora in its Sites of Shame website. The map below shows where people settled after Minidoka and sought to rebuild their lives against the backdrop of racial prejudice and hate. While many Japanese Americans resettled after WW II in Oregon, Washington State, Alaska and California, many Minidoka survivors and their families live throughout the United States.

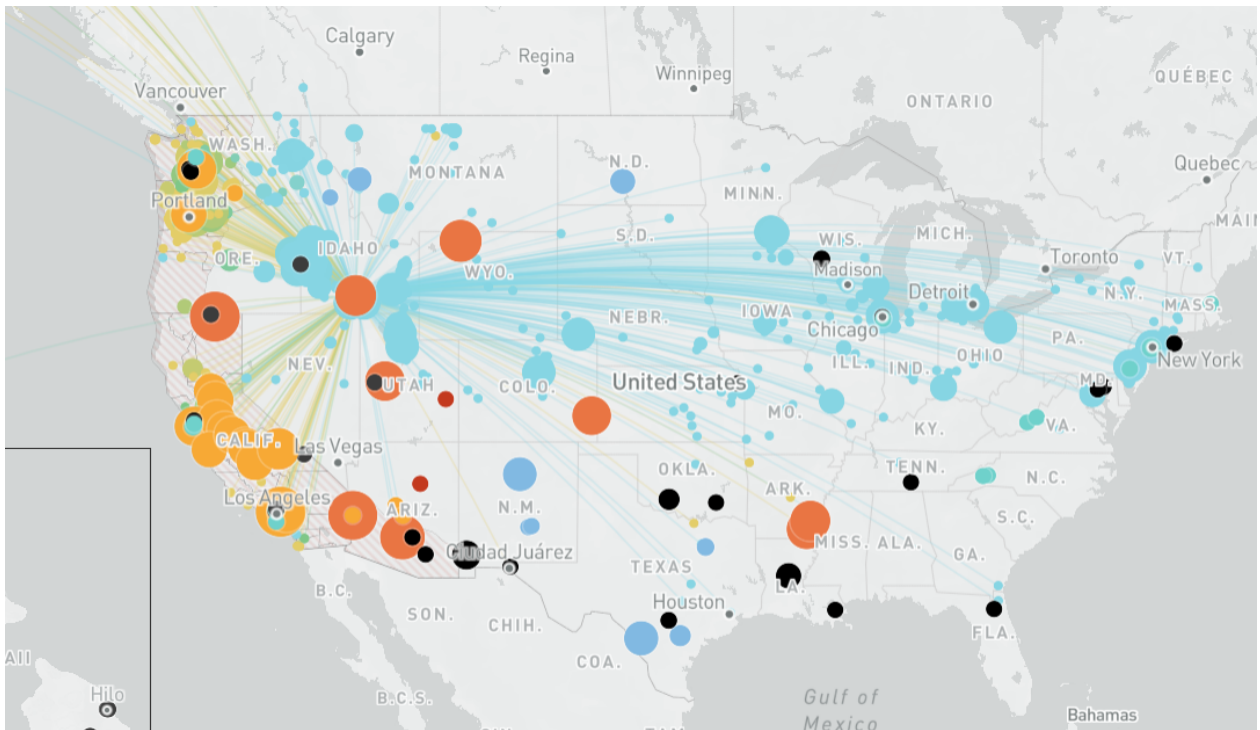
In order to engage the Japanese American community, we encourage BLM to consider the National Park Service's general management planning (GMP) process for Minidoka National Historic Site as a model for public outreach and future engagement on Lava Ridge.⁵ In light of COVID, we encourage BLM to consider virtual public engagement meetings with survivors of incarceration sites, their descendants and other stakeholders, along with in-person meetings in the following locations: Twin Falls, ID; Boise, ID; Idaho Falls/Pocatello area; Ontario, OR; Bainbridge Island, WA; Seattle, WA; Portland, OR; and Anchorage, AK; San Francisco, CA; Los Angeles, CA; and Washington, D.C. The NPS's GMP also includes a list of media outlets it reached out to engage the public in the Minidoka planning process.⁶ We encourage BLM to consider using this list. In terms of engaging with Minidoka and other camp survivors, please note that their ages range from the late 70s, to 80s and 90s.

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<https://www.federalregister.gov/documents/2021/08/20/2021-17920/notice-of-intent-to-prepare-an-environmental-impact-statement-for-the-proposed-lava-ridge-wind>

⁵ National Park Service, Minidoka Internment National Monument, General Management Plan, November 2006, "Chapter 4: Public Involvement and Consultation," pp. 91-133.

⁶ Minidoka GMP, pp. 130-133.



In order to ensure that the Administration achieves its goals, we ask that BLM take a "time out," suspend work on the draft environmental impact statement in order to "reset the clock," and engage the Japanese American community early in the planning process, as required by S.O. 3399. Consistent with DOI process, we respectfully request BLM's consideration of our request to work with LS Power and stakeholders to go back to "square one" on the Lava Ridge site and develop a proposal for scoping that does not impair Minidoka's fundamental resources and values. Once BLM has engaged with the Japanese American community, BLM can go back out to the public with a revised proposal for scoping.

2. LAVA RIDGE PROPOSAL VIOLATES CONGRESSIONAL INTENT

Through bipartisan legislation dating back 15 years, Congress has expressed its intent that the federal government manage Minidoka unimpaired as a nationally-significant site for learning, healing, and honoring the military service of Japanese Americans.

In 2001, President Clinton established the Minidoka Internment National Monument as a unit of the National Park System, using the authority provided by the Antiquities Act. As required by the National Monument proclamation, the NPS engaged with the Japanese American community both on the West Coast and with local stakeholders to develop the park's GMP. In 2006, the NPS released the GMP and finalized it via a record of decision.⁷

Park-Specific Authorizing Legislation. In 2008, Congress passed bipartisan legislation to implement the GMP's recommendations by expanding and redesignating Minidoka as a National Historic Site. The law

⁷ Minidoka Internment National Monument: General Management Plan, Final, November 2006.

required NPS to manage the Site consistent with the Organic Act, as amended.⁸ The Organic Act requires NPS to manage fundamental resources and values “unimpaired for the benefit of future generations.”

Through its management planning process, the NPS identified Minidoka’s fundamental resources and values through its General Management Plan (GMP) and Foundation Document. With regard to the park boundary and adjacent land, the GMP describes an interpretive theme to include: “[t]he vastness, isolation, and open character of site’s desert environment that existed during the historic period are maintained through collaborative partnerships and cooperative efforts with surrounding landowners and others.”⁹ The Final GMP identifies NPS’s goals for Scenic Resource Management: “The NPS will collaborate with neighboring landowners to assist in the protection of historically significant distant views to the surrounding areas.”¹⁰

During the GMP public comment period, the NPS found that “[m]any of the respondents wanted to see the rural character and prominent landscape features of the surrounding landscape protected, particularly within the historic camp limits. Protection could be encouraged through cooperative agreements, such as conservation easements, conservation plans, and scenic conservation easements.”

The NPS’s Record of Decision for the GMP states that “[o]n site education and interpretation will be accomplished through a wide range of visitor experiences, including immersion into the historic scene, interaction with a variety of educational and interpretive media and personal services, and participation in creative and self-directed activities.”¹¹ The ROD also states that NPS will develop on-site interpretive exhibits including the reconstruction of the honor roll, guard tower, flag-pole, and barbed-wire fence.

As part of its management planning process, the NPS also completed a Foundation Document, which states the park’s fundamental resources and values including:

- **Environmental Setting:** “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.”
- **Commemoration and Healing:** Minidoka provides a place “... for engagement, reflection, and healing. These sites provoke connections to individuals affected by the World War II exclusion, forced removal, and unjust incarceration, and serves to commemorate those who survived this difficult chapter of American history.”
- **Public Understanding, Education, and Involvement:** “Educating and engaging the public in understanding the history of the incarceration of Japanese Americans during World War II, the fragile nature of civil rights, and the need to protect civil and constitutional rights in the

⁸ P.L. 110-229, Section 313(c)(5)(A)(ii)(I).

⁹ Minidoka, Final GMP, p. 56.

¹⁰ Minidoka, Final GMP, p. 76.

¹¹ U.S. Department of the Interior, National Park Service, “Record of Decision,” General Management Plan, Final Environmental Impact Statement, Minidoka Internment National Monument,” Jonathan B. Jarvis, Regional Director, Pacific West Region, National Park Service, September 6, 2006.

United States is essential...At Minidoka, special events such as the pilgrimage and the civil liberties symposium connect the public to the history that occurred here and its significance today.”¹²

In addition to the Organic Act, Minidoka’s authorizing legislation directs the Secretary to interpret “the living conditions of the relocation centers.”¹³ As noted above, an important interpretive theme is to maintain “the vastness, isolation, and open character of the site’s desert environment that existed during the historic period.”¹⁴ Minidoka’s authorizing legislation also requires that Minidoka NHS shall be administered in accordance with the Historic Sites Act of 1935.¹⁵ The Historic Sites Act states that “it is a national policy to preserve for public use historic sites, buildings, and objects of national significance for the inspiration and benefit of the people of the United States.”

Japanese American Confinement Sites Act. In 2006, Congress passed bipartisan legislation “to provide for the preservation of the historic confinement sites where Japanese Americans were detained during World War II.” Known as the Japanese American Confinement Sites Act, the Act directed the Secretary of the Interior to:

... create a program within the National Park Service to encourage, support, recognize, and work in partnership with citizens, Federal agencies, State, local, and tribal governments, other public entities, educational institutions, and private nonprofit organizations for the purpose of identifying, researching, evaluating, interpreting, protecting, restoring, repairing, and acquiring historic confinement sites in order that present and future generations may learn and gain inspiration from these sites and that these sites will demonstrate the Nation’s commitment to equal justice under the law.”¹⁶

The law defines historic confinement sites to include Minidoka’s historic footprint, which includes approximately 33,000 acres as depicted in Figure 9.2 from the NPS’s Confinement and Ethnicity publication.¹⁷

Southwest Intertie Project – Legislative Realignment. In 2009, LS Power sought to build a 500 KV power line over the park entrance. Thanks to the leadership of then-Secretary Ken Salazar, the BLM worked with the NPS to relocate the line away from the park. In 2010, Congress passed legislation to approve the SWIP line relocation thereby showing its intent to protect the park from the negative visual impacts of a power line.¹⁸

National Historic Preservation Act of 1966. The NHPA states that it “is the policy of the Federal Government, in cooperation with other nations and in partnership with States, local governments, Indian tribes, Native Hawaiian organizations, and private organizations and individuals, to ... (3) administer federally owned, administered, or controlled historic property in a spirit of stewardship for the inspiration and benefit of present and future generations...”

¹² Foundation Document Overview: Minidoka National Historic Site Idaho and Washington

¹³ P.L. 110-229, Section 313(c)(5)(B)(i)(II)

¹⁴ Minidoka, Final GMP, p. 56

¹⁵ P.L. 110-229, Section 313(c)(5)(A)(ii)(II).

¹⁶ P.L. 109-441, Section 1(a) Emphases added.

¹⁷ P.L. 109-44, Section 2(1)

¹⁸ P.L. 111-212, Section 2003(a)(1)

Pursuant to the NHPA, the U.S. Bureau of Reclamation worked to add a portion of the former Minidoka Relocation Center to the National Register of Historic Places in 1979. The National Register nomination states that:

“The ruins of Camp Minidoka . . . are tangible reminders of one of the most serious and painful contradictions of our country's philosophy of freedom. Through a nefarious legal fiction, over 110,000 loyal Americans were wrenched from their homes and forcefully detained without due process of law, in bleak, barbed-wire enclosed camps scattered over isolated inland areas on desolate tracts of Federal land. The concrete slabs, dilapidated shacks, and scattered refuse surrounded by rich farmland—much of it reclaimed by the camp's inmates, is also a memorial to the suffering and remarkable courage of the Japanese-Americans of that time. Despite being less than 50-years old, this site represents an exceptional chapter in the history of the United States that should always be remembered. Commemoration of this event should take place before memories fade and the sharpness of the event is dulled by time.”

Bainbridge Island – Japanese American Memorial Study Act of 2002. In 2002, Congress passed legislation (P.L. 107-363) to authorize the National Park Service to study the Eagledale Ferry Dock site as a potential addition to the National Park System. After the NPS completed the study, Congress added Bainbridge Island to Minidoka through the 2008 legislation.

Committee Report to Accompany the Redwood Act of 1978. While not in statute, the Senate Energy Committee Report which accompanied the Senate Bill demonstrates the intent of Congress that the Secretary safeguard and protect units of the National Park System:

“The Secretary has an absolute duty, which is not to be compromised, to fulfill the mandate of the 1916 Act to take whatever action and seek whatever relief as will safeguard the units of the National Park System.”¹⁹

“The committee fully expects and intends that the executive branch will utilize every authority to protect and safeguard the property of the United States from adverse activities outside the park boundaries.”²⁰

3. LAVA RIDGE PROPOSAL CONTRAVENES OVER 45 YEARS OF U.S. GOVERNMENT POLICY

In addition to specific Acts of Congress, the Lava Ridge proposal contravenes over 45 years of official U.S. Government policy related to the incarceration as expressed by all three branches of our government including: Presidents of both parties; multiple Congresses; and the U.S. Supreme Court. We have included a camp preservation timeline at the end of this letter.

Starting in 1976 with President Gerald Ford, every U.S. President has taken official actions acknowledging that the incarceration was wrong. As a corollary, the executive branch and every President since President George H.W. Bush has taken action to preserve and interpret sites of incarceration. The U.S. Congress, through many different acts, such as the Civil Liberties Act of 1988, has passed legislation to

¹⁹ Senate Report No. 95-528, p. 9

²⁰ Senate Report No. 95-528, p. 13.

acknowledge the injustice and ensure that this story is not forgotten. In 2018, the U.S. Supreme Court ruled that its World War II-era Japanese American cases were wrongly decided.

Dr. Martin Luther King, Jr. has stated: “the arc of the moral universe is long but it bends toward justice.” The Japanese American community is grateful that our portion of this arc has bent towards justice for almost fifty years, without fail.

We appeal to Secretary Haaland to continue bending the arc towards justice; please do not allow LS Power to bend the arc towards profit of private equity!

4. LAVA RIDGE WOULD NEGATIVELY IMPACT THE EFFORT TO TELL THE FULL STORY OF AMERICA

Secretary Haaland has expressed her support for initiatives to tell the full story of America’s history. Unfortunately, our nation’s history includes examples, like at Minidoka, where our nation did not live up to its ideals expressed in the Declaration of Independence and the Constitution. Currently, the National Park Service interprets several sites of conscience (partial list) including:

- Japanese American incarceration sites (Manzanar, Tule Lake and Honouliuli);
- Massacres of Native people (Sand Creek Massacre NHS, in Colorado);
- The forced relocation of the Cherokee and other Native People via the Trail of Tears;
- Racial violence directed at African Americans fighting for their civil rights (Selma-to-Montgomery NHT, Birmingham Civil Rights, Freedom Riders National Monument);
- A vast network of sites associated with the trade in enslaved people (Forks of the Road).

By approving this giant wind project at Minidoka, our nation would take a step backward in this important effort to tell a more complete story of our history, particularly as we approach the 250th anniversary of the founding of our nation in 2026.

5. RECOMMENDATION THAT BLM STUDY MEASURES TO PERMANENTLY PROTECT MINIDOKA’S FUNDAMENTAL RESOURCES AND VALUES FROM LAVA RIDGE AND FUTURE THREATS

During the pre-planning process, we encourage BLM to consider affirmative protective measures to provide long-term protections for the park’s visual and other resources. These measures could include:

Land Use Plan Amendment. We encourage BLM to use its authority under FLPMA to consider protective measures on BLM lands located both within and outside the historic footprint of Minidoka. The Friends of Minidoka is prepared to work with BLM and other partners in BLM’s land use planning process.

Secretarial authority provided by the Japanese American Confinement Sites (JACS) Act of 2006. As noted above, Section 1(a) of Public Law 109-411 gives the Secretary of the Interiority authority to: “create a program within the National Park Service to encourage, support, recognize, and work in partnership with ... Federal agencies ... for the purpose of ... protecting ... historic confinement sites,” including the 33,000 acre historic footprint of Minidoka.

In addition to the existing JACS grant program, we encourage the Secretary to direct NPS to expand the JACS program to include working with BLM and other partners to protect Minidoka and other former

relocation centers, so “that present and future generations may learn and gain inspiration from these sites and that these sites will demonstrate the Nation’s commitment to equal justice under the law.”²¹

Minidoka National Register Nomination. As noted above, the U.S. Bureau of Reclamation, the former manager of the Minidoka site, prepared a National Register nomination to add a small portion of Minidoka to the National Register. Section 110 of the National Historic Preservation Act places an affirmative responsibility on federal agencies to manage and maintain historic properties under their jurisdiction or control. Furthermore, this section provides that historic properties not under agency jurisdiction or control but potentially affected by agency actions are to be fully considered in agency planning.

Since BLM owns and manages lands both within and outside the historic camp footprint, it has an affirmative responsibility under Section 110 to determine the lands’ eligibility for listing through its association with Minidoka. Furthermore, while private ownership of portions of the landscape is a complicating factor, mixed ownership is not automatically disqualifying for listing on the National Register. As part of the current planning and consultation process, we ask that BLM assess the eligibility of the original 33,000-acre Minidoka landscape for listing on the National Register, in conjunction with its land use planning process for lands located outside of the historic footprint.

6. ACTION ALTERNATIVES SHOULD NOT IMPAIR MINIDOKA’S FUNDAMENTAL RESOURCES AND VALUES

In developing future action alternatives for consideration in the NEPA process, we request that all action alternatives preserve Minidoka’s fundamental resources and values unimpaired.

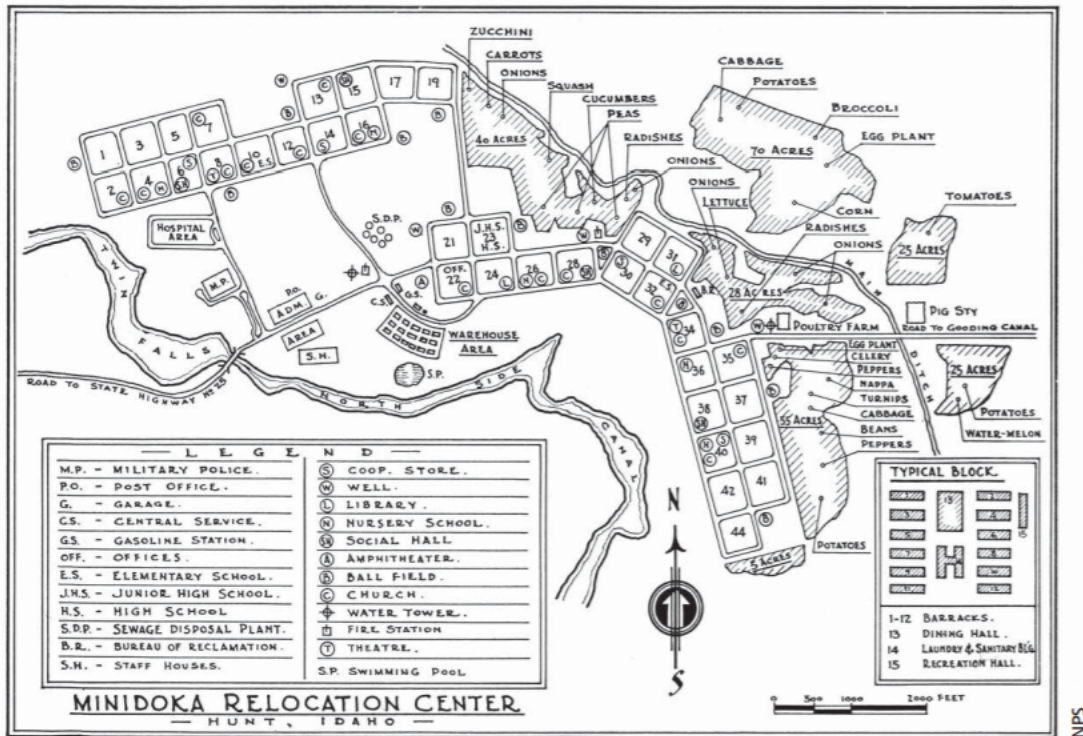
We request that the Draft EIS includes a preferred alternative to help focus public comment.

7. DEPICT MINIDOKA ON MAPS AND GRAPHS

Many of the maps prepared by BLM and LS Power for scoping failed to include Minidoka NHS or were at such a large scale that it was difficult to understand the relationship of the project to the park. In future maps of the project, please include the following:

- Current park boundaries and land.
- Historic outline of the camp barracks blocks, administrative facilities and associated agricultural areas as shown on the Arai map included below.
- Historic camp footprint. Exhibit 9.2 from Confinement and Ethnicity.
- Original alignment of LS Power SWIP Line/Idaho Power ROW over the former Robeson property at the entrance to the park.
- Revised right-of-way of the SWIP line based on the Congressional approval of the relocation.

²¹ P.L. 111-411, Section 1(a).



The Nikkei converted over 700 acres of sagebrush land into productive agricultural land.

Please include maps at several different scales that show the Lava Ridge project in relation to the park, barracks blocks and associated lands, and historic footprint.

8. VISUAL AND AUDITORY SIMULATION AND MODELING

We request that the NPS be assigned the lead with regard to preparing the analysis of impacts to the visitor experience at Minidoka, given that NPS has “special expertise” regarding visitor experience, visual resources, natural quiet and night skies along with the history, and resources and values of the park. This approach is consistent with the Council on Environmental Quality’s NEPA implementing regulations at 40 CFR 1501.8(b)(3) which provides that “[e]ach cooperating agency shall: On request of the lead agency, assume responsibility for developing information and preparing environmental analyses, including portions of the environmental impact statement or environmental assessment concerning which the cooperating agency has special expertise.”

In addition, we request that the future NEPA documents include high quality visual simulation and modeling, including three-dimensional modeling of the proposed project.

9. VORTEX BLADELESS WIND POWER GENERATION

To reduce the visual impacts of the project, please consider replacing the wind turbines with vortex bladeless and other wind power technologies which would have less visual and other impacts on the park and nearby resources.

10. IMPACT OF WIND PROJECT ON PIVOT-IRRIGATION AND AGRICULTURAL PRODUCERS

Please include an analysis of the impact of the wind project on the delivery of water to crops. By creating updrafts, wind turbines can increase evaporation of water needed for agriculture and are associated with increased ground surface temperatures, which could accelerate evaporations. Please include an analysis of cumulative effects of the wind project along with climate change on local farmers.

11. IMPACT OF “SECOND BETRAYAL” ON THE JAPANESE AMERICAN COMMUNITY

During the 1940s, our government betrayed the Japanese American community by taking away our freedom, property, and livelihoods. If approved, the Lava Ridge Wind Project would mark a second betrayal by our own government by dishonoring our past and damaging our future. Please consider the impacts of this second betrayal on our community’s faith in our nation to live up to its full promise.

During her confirmation hearing, Secretary Haaland said that she “will work my heart out for everyone,” including “[p]eople of color whose stories deserve to be heard.” We are people of color. Our stories deserve to be told through Minidoka National Historic Site, without 400 spinning wind turbines as tall as 74 story buildings, dishonoring our sacred ground and violating environmental justice.

Thank you for considering our views on this important matter. We look forward to working with the BLM to develop a proposal that meets the Administration’s multiple goals.

Sincerely,



Robyn Achilles
Executive Director
Friends of Minidoka

cc: Wade Vagias, Superintendent
Shawn Bengé, Acting NPS Director
The Honorable Shannon Estenoz, Assistant Secretary for Fish, Wildlife and Parks
Minidoka Pilgrimage Committee
Japanese American Confinement Sites Consortium
Japanese American Citizens League

Acknowledgement and Preservation Timeline

- 1976 – President Gerald Ford signs a proclamation formally terminating Executive Order 9066 and apologizes for the incarceration.
- 1979 – Minidoka listed on the National Register of Historic Places.
- 1988 – President Ronald Reagan signs the Civil Liberties Act.

- 1990 – The Japanese American Citizens League and local partners commemorate Minidoka as part of Idaho’s Centennial.
- 1990 – President George H.W. Bush apologizes to camp survivors, who receive \$20,000 in reparations.
- 1992 -- Congress passes bipartisan legislation to establish Manzanar NHS in California.
- 2000 – Official groundbreaking of the Japanese American Memorial to Patriotism in Washington, DC.
- 2001-- President Clinton designates Minidoka as a National Monument.
- 2003 -- The Minidoka Pilgrimage Committee organizes the first pilgrimage.
- 2006 -- President George W. Bush signs the Japanese American Confinement Sites Act into law.
- 2008 -- Congress passes bipartisan legislation to expand and redesignate Minidoka as a National Historic Site and include the Eagledale Ferry Dock site on Bainbridge Island, Washington, in the park.
- 2008 -- President George W. Bush protects the Tule Lake Center as part of a National Monument.
- 2009 -- LS Power seeks to build the Southwest Intertie Project (SWIP) Line over the entrance to Minidoka. At the direction of Secretary Ken Salazar, BLM relocates the SWIP Line away from the park.
- 2010 -- Congress passes legislation to approve the SWIP Line relocation (Sec. 2003, P.L. 111-212).
- 2015 -- President Obama establishes the Honouliuli National Monument in Hawaii.
- 2018 – In *Trump v. Hawaii*, Chief Justice John Roberts wrote for the majority: “The forcible relocation of U.S. citizens to concentration camps, solely and explicitly on the basis of race, is objectively unlawful ...”
- 2019 – Congress redesignates Tule Lake & Honouliuli as National Historic Sites.
- 2020 – NPS opens the new visitor center at Minidoka.
- January 2021 -- Minidoka marks its 20th anniversary as a place for healing, learning and celebrating.
- January 2021 – President Biden signs Executive Order 13985 to advance racial equity “for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality.”
- February 2021 – President Biden reaffirms the formal apology to Japanese Americans.

- April 2021 – Sec. Haaland announces a DOI budget initiative, including funds for Minidoka (EO 13985).
- May 2021 – In signing the COVID-19 Hate Crimes Act, President Biden acknowledges centuries of AAPI and Native Hawaiian leadership to help build our nation, “only to be stepped over, forgotten, or ignored...considered, by some, the ‘other’... it’s wrong.”
- July 2021 – The U.S. House passes bipartisan legislation (416-2) to create Amache National Historic Site.
- August 2021 -- The Bureau of Land Management (BLM) announces its Notice of Intent for Lava Ridge.
- October 2021 – Brenda Mallory, Chair, CEQ states: “When we protect a place as a National Monument, it is protected for all time, for all people.”