



Tule Lake Segregation Center: Historic Jail Restoration Project Environmental Assessment



Figure 1: Tule Lake Jail surrounded by Chain-link Fence and Free-standing Shed

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Internet: <https://parkplanning.nps.gov/projectHome.cfm?projectID=52954>

Written comments will be accepted via PEPC (preferred), by email (tule_superintendent@nps.gov), or by mail.

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Responses to substantive comments on the Environmental Assessment (EA) will be addressed in the proposed Finding of No Significant Impact (FONSI) or will be used to prepare an Environmental Impact Statement (EIS) (if warranted).

Executive Summary

The need for the project is to prevent further deterioration of the historic Tule Lake jail in Newell, California. The purpose of the project is to provide a safe and usable structure for visitors and park employees; and to rehabilitate and protect the historic resources of the building. This EA examines the National Park Service (NPS) proposal to restore the building.

The Tule Lake Segregation Center National Historic Landmark (NHL) jail building restoration is Alternative B. The No action (Continue Current Management) option is Alternative A. Both alternatives are evaluated. The jail is a contributing building to the NHL. Alternative B, the NPS Proposed Action, would fully restore the exterior of the building, remove the freestanding shed and chain-link fence, and restore or rehabilitate the jail interior. Alternative B would also improve accessibility to and within the building.

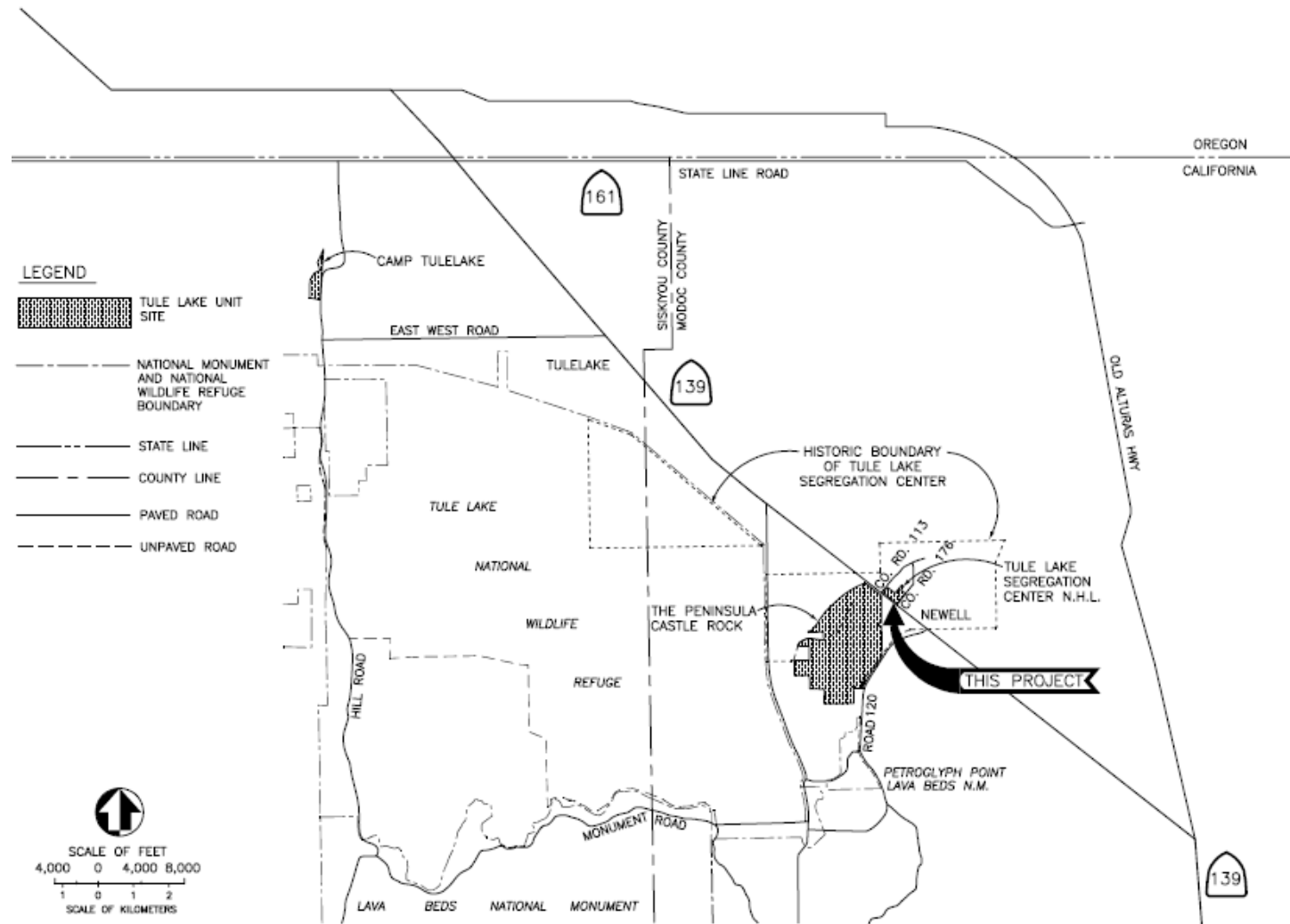
Alternative B includes structural improvements to the jail's outer envelope, filling voids where needed to protect the building and its contents from atmospheric elements, and reinstalling the jail doors, windows, window bars, cell doors, and cell door side panels to their historic positions. Missing site features such as plumbing and lighting fixtures would be acquired and installed in the jail to aid interpretation. Improvements also include the addition of a hydronic heating system to slow aging degradation, and restoration of the electric system for lighting, and to meet health and safety requirements (security and fire detection alarms). Protection for historically and culturally significant graffiti inscriptions on the jail cell walls, largely done in pencil and inscribed during the jail's period of significance (1944-1946), would also occur. Some interior changes would be made to provide access for persons with disabilities and a temporary accessible parking space and a temporary accessible pathway would be constructed to provide enhanced mobility for NPS staff and visitors.

The alternatives would have no or negligible impacts on Geology and Geologic Hazards, Air Quality, Biological Resources, Hydrology and Water Quality, Land Use, Socioeconomics, Environmental Justice, and Indian Trust Resources. Impact topics evaluated and carried forward include Historic Resources and Cultural Landscapes, Archaeological Resources, Human Health and Safety and Visitor Experience.

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Figure 2: Regional Location/Project Area



TULE LAKE UNIT WWII VALOR IN THE PACIFIC NATIONAL MONUMENT

Chapter 1: Purpose and Need

Purpose

The purpose of the project is to restore the jail building to its appearance during the period of significance (1944-1946) and to improve interpretive opportunities within the building, enabling enhanced visitor use and interpretation.

The jail would be available to the public as a physical reminder of the period of its use as an incarceration facility for those who were imprisoned at the Tule Lake Segregation Center.

Need

The Tule Lake Segregation Center jail building has deteriorated. The most recent condition assessment from the Historic Structures Report (2011) lists it in “fair-to-poor” condition (Wiss, Janney, Elstner Associates, Inc. 2011). Due to its condition, the building could be subject to extensive damage if an earthquake were to occur.

Although the building is currently protected from the elements by an exterior shed canopy (constructed over the building in 2004) and boarded-up, vented windows, permanent protection and restoration of the building are needed. Providing a weathertight, restored building would provide long-term protection for sensitive historic resources within the jail building (including the jail cells and the historic graffiti that covers some of the walls).

Restoring the building would prevent further decay of the building, reducing loss of historic elements and allowing improved use of the building for historic, cultural, and educational purposes.

Background

The Tule Lake Segregation Center and other nearby resources were included as a unit of the World War II Valor in the Pacific National Monument, which was established by Presidential Proclamation in December 2008. The Tule Lake Unit is intended to preserve the history of the Japanese American World War II incarceration. NPS lands protecting this unit comprise a small part of the original area encompassed by the Center.

As described in the National Register Nomination:

The Tule Lake Segregation Center National Historic Landmark encompasses the original segregation center’s Stockade, the War Relocation Authority (WRA) Motor Pool, the Post Engineer’s Yard and Motor Pool, and a small part of the Military Police Compound. These portions of the segregation center retain exceptional integrity and value for commemorating and conveying the history of the Japanese American relocation.

Project Location

The jail is situated within the boundary of the former Tule Lake Segregation Center, on federal land in the unincorporated town of Newell, in Modoc County, California (Figure 1: Regional Location/Project Area). The jail is located near the southwest boundary of the original property, in what was originally the administrative and maintenance area. The area is surrounded by chain-link fencing and is accessed through a gate on County Road 176 that leads to a gravel parking area north of the jail building. The jail building is set back and is approximately 530 feet northeast of Highway 139; County Road 176 is parallel to the southeast property line of the Segregation Center, about 150 feet from the jail.

General Management Plan/Interim Strategic Plan

The Tule Lake Unit General Management Plan (approved long-term development guidance) is complete and the decision document (Finding of No Significant Impact) is currently undergoing review. Until the GMP and FONSI are complete, guidance is based on a Strategic Plan developed to provide interim

direction for park management (National Park Service; Department of the Interior, 2013). The Strategic Plan provides goals, strategies, and proposed actions identified by the NPS staff and stakeholders for the site. The Strategic Plan includes maintaining the site interpretation and education programs. The Tule Lake Unit would provide historical information and data compiled through resource management, effectively increasing opportunities for visitors to experience the site at the site and through virtual sources.

Tule Lake is the largest of the ten War Relocation Areas (WRA), where people of Japanese descent from western Washington, Oregon and Northern California were forcibly incarcerated during World War II. Tule Lake was located in an open field on a drained, shallow lake bed. The site was selected due to its location east of the Cascade/Sierra Mountains, far from the coast and on public lands with links to rail and roadways. All of the prison camps, including Tule Lake, were in remote, largely uninhabited, and desolate areas.

The Tule Lake Segregation Center was originally constructed in 1942. In 1943, Tule Lake was converted to a high-security segregation center to imprison Nikkei deemed to be "disloyal" due to their answers to the infamous loyalty questionnaire. Those making a negative response or refusing to mark an answer to Questions 27 and 28 became known as the "No-Nos." The center was unique, using maximum security techniques not used in the other WRA camps. It had its own military stockade and jail to imprison elected leaders and dissidents. Additional guard towers were constructed and an eight-foot high double fence was constructed around the secure area.

At the peak population, the detention center housed over 18,700 persons. Mismanagement and repression at the Tule Lake Segregation Center led to widespread turmoil and disillusionment among the unjustly imprisoned. Tule Lake became the site of a government denaturalization and deportation program that led nearly 5,500 Japanese Americans at Tule Lake to give up their U.S. citizenship, leaving them vulnerable to deportation as "enemy aliens." The facility was guarded by over 2,000 U.S. soldiers, making it the largest population center in the region at the time.

Construction of the Tule Lake Jail was completed in 1944, approximately two and one half years after construction of the camp. The concrete jail structure was built to imprison these "enemy aliens" prior to removal to Department of Justice internment camps in Santa Fe, NM and Bismarck, ND, part of a deportation program that is unprecedented in our Nation's history. The jail is considered a key component to telling this story of racism and injustice. As described below, the jail, along with some of the surrounding property, miscellaneous structures and landscapes are now part of Tule Lake Unit of the World War II Valor in the Pacific National Monument managed by the National Park Service.

The jail was designed and constructed by those imprisoned at Tule Lake. Jail construction was supervised by a prisoner, Jimi Yamaichi, who said it was difficult to find other inmates willing to build a jail for their own people. A number of the inhabitants of Tule Lake had engineering degrees, and there were three or four of these engineers who designed the building and prepared the drawings. The drawings were apparently later destroyed. Material for construction, especially steel, was scarce during the war years, however, Tule Lake apparently had high priority through its association with the Army, so the reinforcing steel, cement, and aggregate necessary for the construction was made available.

Once the jail was completed, it was filled almost immediately. The jail was designed to hold 20, but reportedly held up to 100 inmates. In this jail, within a jail, prisoners were held by the Army and the WRA without charges or hearings. The inmates of the jail were incarcerated without notification and without any formal trial. Those incarcerated were victims of Inu, snitches who reported them to the Center Administration. No visitors were allowed in the jail. There was no kitchen facility, so the inmates ate in a segregated portion of the stockade, and food was partially prepared by the camp hospital. There were offices for the security staff located in the main room at the south, and the adjacent room to the east served as an activity room. The jail was heated by coal-burning heaters, similar to those used in the rest of the camp.

Public Participation

Public Scoping

In parallel with the start of the design effort public scoping comments were solicited to supplement the broader comments received about the area from scoping on the park's General Management Plan (GMP). On July 6, 2014 the park held a public meeting in Klamath Falls, which was attended by an approximately 30 people. This meeting was held in conjunction with a public meeting for the GMP and the Tule Lake Pilgrimage that year. A press release requesting comments was issued on July 16, with a due date of August 6, 2014.

The following questions were asked during public scoping:

- 1) What issues or concerns do you have about the jail restoration Proposed Action?
- 2) What hopes, preferences, or expectations do you have for the visitor experience at the jail in the future?
- 3) While the current Proposed Action is focused just on the jail building itself, historically the jail was part of the larger stockade area. How do you think the jail restoration relates to the future interpretation or recreation of other parts of the stockade?
- 4) While visitor center functions are not intended for the jail building, exhibits may be part of future interpretation plans for the building. To what degree do you feel exhibits should be inside the building versus keeping the building more as it appeared when it was originally built?
- 5) Since not all interior pieces like bunks and plumbing fixtures currently exist, how important do you feel it is to restore these items through the entire interior versus, for example, fully restoring a representative cell?
- 6) Since photo documentation is limited for the jail and that now that there is a specific Proposed Action on the jail, we would like to solicit any recollections about how the building and site were used, furnished, etc. Do you have firsthand knowledge of how the jail looked like? Do you have photos that you would like to share?¹
- 7) Do you know what happened in each of the administration rooms?
- 8) Do you know what was the enclosed rear yard was used for? Since the rear yard is fenced, the assumption is that every inmate came and left through the front, is that correct?

There were seven public comments received in response to public scoping. The comments included two submitted via PEPC, two received via email, and others via U.S. mail, and in-person (handwritten responses to the questions) during the Pilgrimage. These responses included six from individuals and one from the non-profit National Parks Conservation Association (NPCA).

Some respondents answered the questions. The range of comments supported the initial design direction but some also encouraged full restoration if it could be accomplished, with one commenter also suggesting fabrication of missing elements, and one suggesting providing a media room where historical accounts could be presented through letters and photos.

Several comments included encouragement for restoration of other parts of the stockade, such as for a guard tower and the barbed wire perimeter fence (or portions). Some comments suggested interpreting specific incidents, such as the use of pup tents in the stockade yard for punishment; the use of Sherman tanks when the area was put under martial law; and the relationship of the jail to other detention centers, such as the Moab and Leupp Citizen Isolation Centers.

Comments particularly encouraged providing the in-depth personal stories that visitors understand what it was really like for prisoners (held without charges, denied counsel, and family visits), and for family,

¹ Some of the questions were aimed at trying to get more information about uses in different areas of the jail since documentation from when the building was occupied is very limited.

who attempted to communicate with them. There was support for both limited and complete interpretation via storytelling and exhibits in the jail, as well as for improving access and protection for the graffiti. One comment requested that exhibits be specific to the jail, depending on what would be installed elsewhere in the Center and specifically, in the stockade area. Another comment suggested full restoration of the interior, including placement of representative personal belongings, furnishings, and mannequins that demonstrated use for visitors touring the jail.

NPCA urged full funding for the restoration without the requirement for a matching grant. NPCA advocated restoration of a representative cell with low impact interpretation, funding for an outreach effort to learn the stories of the incarcerated before it is too late, and funding for additional research about the jail.

Some comments also included offers of help, such as to conduct additional research or additional funding.

Issues and Impact Topics from Internal and External Scoping

Impact topics were retained if they are directly related to the proposal; if analysis of environmental impacts is important to make a choice between the alternatives; if the environmental impacts were raised as a concern by the public and/or other agencies; or if there are potentially significant impacts associated with the issue.

Impact Topics Included in this Document

The following resource topics are considered in this Environmental Assessment (EA): historic resources and cultural landscapes, archaeological resources, human health and safety, and visitor experience.

Impact Topics Dismissed from Further Analysis

The following impact topics were dismissed from analysis in this EA because there would be no or minimal impacts:

Physical Resources

Geology and geologic hazards
Soils
Hydrology and Water Quality
Air Quality

Biological Resources

Vegetation
Wildlife
Threatened and Endangered Species

Cultural Resources

Ethnographic Resources
Indian Trust Resources

Social Resources

Socioeconomics
Environmental Justice

Physical Resources

Geology and Geologic Hazards

The Tule Lake Segregation Center is located in the Modoc Plateau geomorphic province, characterized by Quaternary igneous (volcanic) and sedimentary rock. The Modoc Plateau is a volcanic table (elevation 4,000-6,000 feet amsl) consisting of a thick accumulation of lava flows and tuff beds along with many small volcanic cones (California Department of Conservation; California Geologic Survey, 2002).

The jail site is not located within a liquefaction zone, an area of significant landslide potential, an Alquist-Priolo earthquake zone, an earthquake rupture zone or in a zone with a high seismic shaking potential (California Geologic Survey, 2008). Although fault rupture is unlikely in the jail area, very infrequent earthquakes could cause strong shaking at the site (California Geologic Survey; USGS, 2008); therefore, geology and geologic hazards are dismissed from further.

Soils

The site is nearly level, with an elevation range across the site of 3 feet (4,044 to 4,047 feet above mean sea level) (Architectural Resources Group, 2014). Site soils include Fordney loamy fine sand (90%), Roho loamy fine sand (4%), and Dehill loamy fine sand (4%), at no greater than a 2% slope (United States

Department of Agriculture; Natural Resources Conservation Department, 2015). Because the project would affect an existing building and the graded area surrounding it, there would be little excavation or other effects on area soils.

Hydrology and Water Quality

Due to the scope of the jail restoration, which would be limited to internal and external building improvements, removal of the bolt-together shed roof, and construction of a temporary accessible parking space on level ground that has been previously disturbed, implementation of the alternatives would not have the potential to alter site drainage patterns, or to contribute added nutrients or to affect high pH levels within nearby waterbodies listed on the 303(d) list of Impaired Waterbodies (Tule Lake, the Klamath River, and the Lost River). Because the project is subject to development and implementation of a Storm Water Pollution Prevention Plan (SWPPP) that must list the Best Management Practices (BMPs) that the discharger will use to protect storm water runoff, and describe the placement of those BMPs. (California Environmental Protection Agency; State Water Resources Control Board, 2014) the potential for discharge would be greatly reduced. Therefore, hydrology and water quality are dismissed from further analysis.

Air Quality

The Northeast Plateau Air Basin (NPAB), which includes Siskiyou, Modoc and Lassen Counties, has a climate distinct from all other air basins in California. The NPAB has distinctly defined seasons that follow a continental pattern, rather than a marine pattern. Winters are cold and snowy; summers are warm and dry. There is no transported air pollution from major urban areas. As in many rural areas of California, particulates from dust and wood smoke are sometimes a problem. The Modoc County portion of the NPAB is designated a state nonattainment area for PM10. All other criteria air pollutants are designated as unclassified or attainment for both federal and state ambient air quality standards. Only the city of Yreka experiences occasional ozone concentrations that approach “near exceedances” (Carle, 2006).

Construction activities associated with the Alternative B, including equipment operation from removal of the bolt-together shed roof and construction of a temporary accessible parking space and pathway could result in temporarily increased vehicle exhaust and emissions, as well as inhalable particulate matter. Construction dust associated with exposed soils would be controlled with the application of water or other approved dust palliatives. Also, dust-creating activities would be suspended when winds could create visible dust clouds that would affect sensitive receptors (homes, schools, etc.). Overall, there could be a local, short-term, negligible degradation of air quality during construction activities; however, no measurable effects outside the immediate construction site would be anticipated. Any construction-related, adverse effects to air quality would be temporary, lasting only as long as construction.

Section 176(c) of the Federal Clean Air Act (FCAA) prohibits federal entities from taking actions in nonattainment or maintenance areas that do not conform to State Implementation Plan (SIP) for the attainment and maintenance of the NAAQS. Therefore, the purpose of conformity is to (1) ensure federal activities do not interfere with the budgets in the SIPs; (2) ensure actions do not cause or contribute to new violations, and (3) ensure attainment and maintenance of the NAAQS. The proposed action would not violate any air quality standard or result in a net increase in any criteria pollutant for which the Modoc County portion of the NPAB is in nonattainment (PM10) under federal or state ambient air quality standards. Because there would be minimal effects on air quality; therefore, air quality is dismissed from further

Biological Resources

Vegetation

Vegetation surrounding the Tule Lake Segregation Center consists of mowed grasses adjacent to the building within a fenced area, surrounded by areas of sparse sagebrush scrub. Because the site is within the town of Newell, and was cleared in the past for construction of the Segregation Center, nearby sagebrush scrub has been heavily disturbed. There are no trees or wetland features on the site.

Wildlife

Although the temporary metal canopy covering the building may provide nesting areas for birds and small mammals and insects may be present, because the project area is located in a developed setting within the town and the land at the project site has been previously cleared, the area does not support suitable wildlife habitat. Therefore impacts to vegetation and wildlife have been dismissed from further consideration.

Threatened and Endangered Species and Species of Concern

Based on the list of species provided by the U.S. Fish and Wildlife Service (USFWS) for Modoc County (USFWS 2015), none of the species occurs at the project site because of lack of habitat and/or the disturbed nature of the area. Species on the list include fish found in Tule Lake, and plants and animals found in forest or wetland habitats, such as vernal pools, that are not present at or near the project site.

Although nearby sagebrush could provide habitat for the Greater sage grouse (*Centrocercus urophasianus*), a proposed threatened candidate species in California, it has been highly disturbed and no sage grouse are known from Newell or nearby (Nolan Banish, USFWS, Personal Communication). Sage grouse have been observed within 10 to 15 miles of the project site (CNDDDB 2015).

None of the migratory birds on the list provided by the USFWS are known to nest in building eaves, except for the oak titmouse, which does not have preferred habitat (open oak and pine forests with nearby dense woodlands) adjacent to the site. Although Brewer's sparrows and sage thrashers are found in sagebrush habitat, the quality of this habitat near the jail is poor and does not provide adequate nesting or foraging habitat.

The minimal effects from the alternatives on wildlife would be from disturbance during construction and maintenance activities, rather than from habitat loss. Although construction of an accessible pathway (Alternative 2) and removal of the canopy has the potential to disturb wildlife, including small mammals and birds that may nest in the eaves, no nesting has been observed near the building; none of the listed or candidate species or migratory birds are likely to be present; and effects from disturbance on species that are present would be small. Therefore effects on wildlife and vegetation have been dismissed from further consideration.

Cultural Resources

Indian Trust Resources

U.S. Department of the Interior (USDOI) policy requires either an analysis or specific dismissal of Indian trust resources (USDOI 1995). No Indian trust resources are part of the project area; therefore, Indian trust resources were dismissed as an impact topic in this EA.

Social Resources

Socioeconomics

Census data retrieved from the U.S. Census Bureau shows the most recent data available for Modoc County. Table 2, below, provides a comparison of the County with Newell, CA. Newell falls below the county average income level by nearly \$13,000 annually with a 16.4% higher percentage of population living below the poverty line.

Table 1: Regional Census Data

| | Modoc County | Newell |
|--|--------------|--------|
| Population, 2013 estimate | 9,147 | 449 |
| White alone, percent, 2013 | 77.6% | 44.3% |
| Hispanic or Latino, percent, 2013 | 14.7% | 60.4% |
| American Indian and Alaska Native alone, percent, 2013 | 5.1% | 5.1% |

| | | |
|---|----------|----------|
| Asian alone, percent, 2013 | 1.1% | - |
| Black or African American alone, percent, 2013 | 1.10% | 0.4% |
| Native Hawaiian and Other Pacific Islander alone, percent, 2013 | 0.3% | 1.1% |
| Two or More Races, percent, 2013 | 3.4% | 6% |
| Housing units, 2013 | 5,197 | - |
| Homeownership rate, 2009-2013 | 68.8% | - |
| Persons per household, 2009-2013 | 2.23 | - |
| Median household income, 2009-2013 | \$36,212 | \$23,403 |
| Persons below poverty level, percent, 2009-2013 | 21.0% | 37.4% |
| Source: United States Census Bureau; 2009-2013 Community Survey | | |

If implemented, Alternative 2 would employ as many as six construction workers at any given time for the duration of construction, providing a small economic opportunity for regional residents, including an equivalent economic boost to the community. There would be no economic hardships or other adverse effects affecting population or other socioeconomic indicators, from implementation. Therefore, socioeconomics has been dismissed from further.

Environmental Justice

USDOJ policy requires either an analysis or specific dismissal of environmental justice (USDOJ 1997) under Executive Order 12898: "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" (February 1994). Implementation of the proposed action would primarily affect a minority group, Japanese-Americans, to whom the jail may hold cultural, historic, personal or ancestral significance. It also would have the potential to impact visitors to the jail including those who attend the Tule Lake Pilgrimage. Implementation would have primarily beneficial aspects from preservation of the jail and its historic character which by extension would benefit both public understanding of the site and understanding of its effects on Japanese-Americans and others of Japanese ancestry. . As a result, environmental justice was dismissed as an impact topic for the following reasons:

- The impacts associated with implementation of the alternatives would not have disproportionate adverse effects on any minority or low-income population or community.
- Implementation of the alternatives would not result in any identified effects, including human health effects, specific to any minority or low-income community.

Chapter 2: Alternatives, Including the Proposed Action

Introduction

The alternatives were generated based on NPS Management Policies (NPS 2006), analysis of the Tule Lake Jail Historic Structures Report (HSR) (WJE Associates, Inc. 2011), direction from development of the draft General Management Plan (NPS 2016) and Foundation Document (NPS 2015), interdisciplinary team analysis, public scoping, and consultation with contractors (Architectural Resources Group (ARG) and SOHA Engineers), and other experts.

Planning Background

The HSR for the Tule Lake Jail (WJE Associates, Inc. 2011) envisioned full restoration of the jail, including all surfaces and materials and all 24 cells (3 salvaged and 21 new). It also identified another option for restoring one cell with bunks (3 salvaged and one new). The recommended treatment approach under The Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) was restoration. Although the HSR made recommendations for the building exterior, there were no recommendations for the surrounding landscape or for exterior, or interior, accessible routes.

The interior wall surfaces of the jail have many areas of historic graffiti, mostly in pencil. The graffiti was assessed separately from the HSR by a conservator and recommendations were given in their report, Tule Lake Historic Graffiti, Assessment Report and Conservation Treatment Recommendations (Rosa Lowinger & Associates 2014). The recommended approach to graffiti conservation is consolidating the painted surface to stabilize the graffiti and substrate. Additional paint analysis and consolidant testing were recommended for identifying the final treatment approach.

Three preliminary alternatives were proposed for initial study including 1) stabilization, including restoring the exterior envelope of the building and returning available metal artifacts to the interior; partial restoration; and full restoration (see Alternatives Considered but Dismissed). Because of the significance of the building (the only remaining jail from the War Relocation Centers and the importance of the jail to the Tule Lake Segregation Center NHL as a jail within a jail, participants wanted to balance the desire to experience the jail as it was, while avoiding alterations that would make it look new. Initial conclusions were that leaving some damaged areas would be appropriate if stabilized, and that original metal items removed but that have been acquired (bunks, doors and frames, stove) should be reinstalled.

Alternative A: No Action – Continue Current Management

Under Alternative A, the freestanding shed that currently covers the building, protecting it from the intrusion of rain and snow, would be maintained, windows would continue to be boarded up, and the jail would be periodically cleaned of rodent droppings.

There would be no restoration of the building exterior or interior and the building would continue to deteriorate. Its poor condition combined with temperature fluctuations are thought to be contributing to deterioration. The displaced artifacts from the jail (i.e. cell doors, cell panels, bunks, etc.) which are currently being stored by the park would not be used, and would not be restored to their original state or placement in the jail.

Although use of the building would continue to occur on guided tours, no improvements would be made to enhance the accessibility of the jail. Under Alternative A, there would continue to be no lighting, fire detection/alarms, structural stabilization, conditions that could all continue to result in continued decay and the potential for long-term structural failure. Without restoration, the jail would not be available for expanded cultural and educational activities and the activities that do occur may eventually have to be reduced due to the building's advanced deterioration.

Alternative B: Restoration of the Historic Exterior and Partial Restoration of Historic Interior (Proposed Action)

Under Alternative B, the NPS would undertake full restoration on the building exterior and some full and some partial restoration of the interior.

Exterior restoration would consist of cleaning the exterior walls, repairing spalled concrete, replacing deteriorated concrete, reinforcing the bar and roof structure, and built-up roof membrane; replacing fascia trim; and rebuilding exterior entry doors, windows and screens. Interior restoration would include complete restoration of the East Cellblock and Cells 9 and 10. Other interior areas would receive structural repairs, reinstallation of metal doors and cell doors with side panels (NPS has the metal works that would be reinstalled in storage), and wood doors and frames where appropriate, but bunks and plumbing fixtures would not be replaced in other parts of the jail. Key to the interior improvements is the emphasis on graffiti preservation and in limiting overall improvements to health and safety conditions that structurally stabilize the building. Although plumbing fixtures from the jail are not available, the restored cells would have period appropriate fixtures installed. Similarly, while repainting would occur in the East Cellblock and Cells 9 and 10, repainting, except to paint areas of structural repairs, would not occur. Repainting of structural repairs would occur to blend these with the new concrete, but making the inside look new with fresh clean paint and new wall finishes could move the focus away from visitor understanding of the reality of the conditions that the incarcerated experienced.

Partial restoration of the interior would allow for accessibility improvements in accordance with the Architectural Barriers Act (ABA)². Partial restoration is also being undertaken because the NPS does not have all of the original historic fabric. For example, because there is one missing gate, instead of fabricating a new one, one cell will be left open and available for interior access. More information about proposed restoration activities is described below and shown in Figure 2: Exterior Elevations: Proposed Repairs and Figure 3: Floorplan.

Exterior Improvements

Alternative B would include use of the following kinds of equipment and tools: a power generator, a compressor to run pneumatic tools, power washing equipment (exterior), a concrete mixer, powered saws, a compressed air nail gun, drill/screwdriver, grinder, and a welder. The following specific elements comprise Alternative B:

Concrete Walls/Architectural: Clean the exterior walls using soap and a low-pressure power wash, remove the loose protective coating and deteriorated concrete, and reapply the protective coat to match the existing overall appearance.

Concrete Walls/Structural: Sandblast and treat the exposed rebar with a cement-like anticorrosion coating. Repair weathered areas with mortar patches, and an epoxy injection repair method to seal selected larger cracks.

Structural Repair of the Southern Window Support: Remove loose and deteriorated concrete around the window; realign the existing steel bars within the support boundaries; cut and splice rebar if necessary; provide new steel stirrups; form and pour new concrete support; install forms (to match the pattern of form boards at adjacent concrete surfaces where appropriate); and install additional mortar patches at the head and sill, as necessary.

Windows: Repair all wood frames. This would include actions to replace the missing large window sash at south and east elevations with new wood window sash; replace the missing small window

² The ABA is the law that applies to federal agencies, while the Americans with Disabilities Act (ADA) applies to state and local government.

sash with new, nine-light wood awning window sash; refurbish and re-glaze the transom window on the south side; and prime/paint all windows and frames.

Doors: Reinstall, prep, prime and paint the metal door on the north side and replace the missing door on the south side with a new, three-panel wood stile and rail door.

Roof Eave/Architectural: Install new wood fascia.

Roof Eave/Structural: Remove loose and deteriorated concrete from the roof eave; sandblast and treat the exposed rebar with a cement-like anticorrosion coating; repair damaged areas with mortar patches; design repairs to mimic board form lines in concrete where appropriate; and form and pour a new roof edge to match the existing form.

Roof Surface/Architectural: Refurbish the flashings at the roof penetration points, and install a new roof.

Roof Surface/Structural: Remove loose and deteriorated concrete from the slab surface, sandblast and treat all exposed rebar with a cement-like anticorrosion coating, and repair weathered areas with mortar patches.

Roof Separation at Southwest Corner/Structural Repair: Remove loose and deteriorated concrete, saw-cut through existing reinforcing steel in the gap between the roof slab and the top of the wall to install epoxy grout ports at the top of the wall (spaced at 18 inches on center on both sides of the wall); slowly load the roof edge with sand bags or water barrels until the slab contacts the top of wall seal the edges of the remaining gap; install dowels 18 inches apart on center in drilled, epoxy-filled holes; and keep the top of the dowel one inch below the surface and coat with a cement-like noncorrosive coating before covering the repair with mortar.

Exterior Sheet Metal and Plumbing Pipes: Remove all surface corrosion, replace two missing vent stacks that served administrative area toilet rooms in the east area of the Jail, and apply a corrosion-inhibitive paint.

Shed: Disassemble and salvage the shed and its foundations. The shed was originally installed as an alternative to structural restoration of the Jail and to provide shelter from precipitation. Because exterior improvements to the Jail would seal the structure and protect the artifacts installed within, the shed would no longer be needed.

Deconstruction of the shed would require a crane to support individual shed pieces as they are detached, using an impact driver to remove nuts/bolts, from the shed frame and lowered onto a truck. A small jackhammer would be used to break the cement shed foundations into smaller, transportable pieces.

Interior Improvements

The following interior improvements would occur in the jail:

Pencil Graffiti Conservation: Historic graffiti identified by *Rosa Lowinger and Associates* (RLA) (Lowinger & RLA, 2014) would be conserved. An inventory of graffiti included photographing, measuring, and determining the location of each element on its respective wall. Each area of graffiti was assigned a label based upon the wall on which it was located. Orientation references are based on the HSR and 3-dimensional terrestrial Light Imaging and Radar Detection (LiDAR) laser scans and orthographic photos of each building. After the structure was abandoned following the cessation of camp use and jail operations, it was and exposed to trespassers and it is possible that additional graffiti was inscribed after the period of significance. Because it is nearly impossible to date these additions, the Conservator opted to include all observed graffiti.

Additional conservation planning for the graffiti would include the following steps:

- Laboratory analysis of paint substrates to determine composition;
- Testing solubility of black paint and crayon so as not to damage graffiti with the application of a consolidant; and
- Testing additional consolidant products that are compatible with the identified paint type through on-site mock-ups.

Additional analyses and treatment recommendations by a concrete conservator will also be required to finalize the treatment plan. A second round of consolidant testing was performed by ARG in 2014. The contractor would be required to work with a conservator to determine a conservation plan and physical barrier protections during construction.

As described in the construction documents, the goal of graffiti conservation is to consolidate and stabilize friable paint surfaces behind graffiti, creating intact areas of paint and graffiti that cannot be wiped away (ARG:A5.1 2017).



Densho Digital Archive, 2008

Figure 3: Historic Photograph Showing Jail under Construction c. 1940s

Figure 4: Exterior Elevations: Proposed Repairs

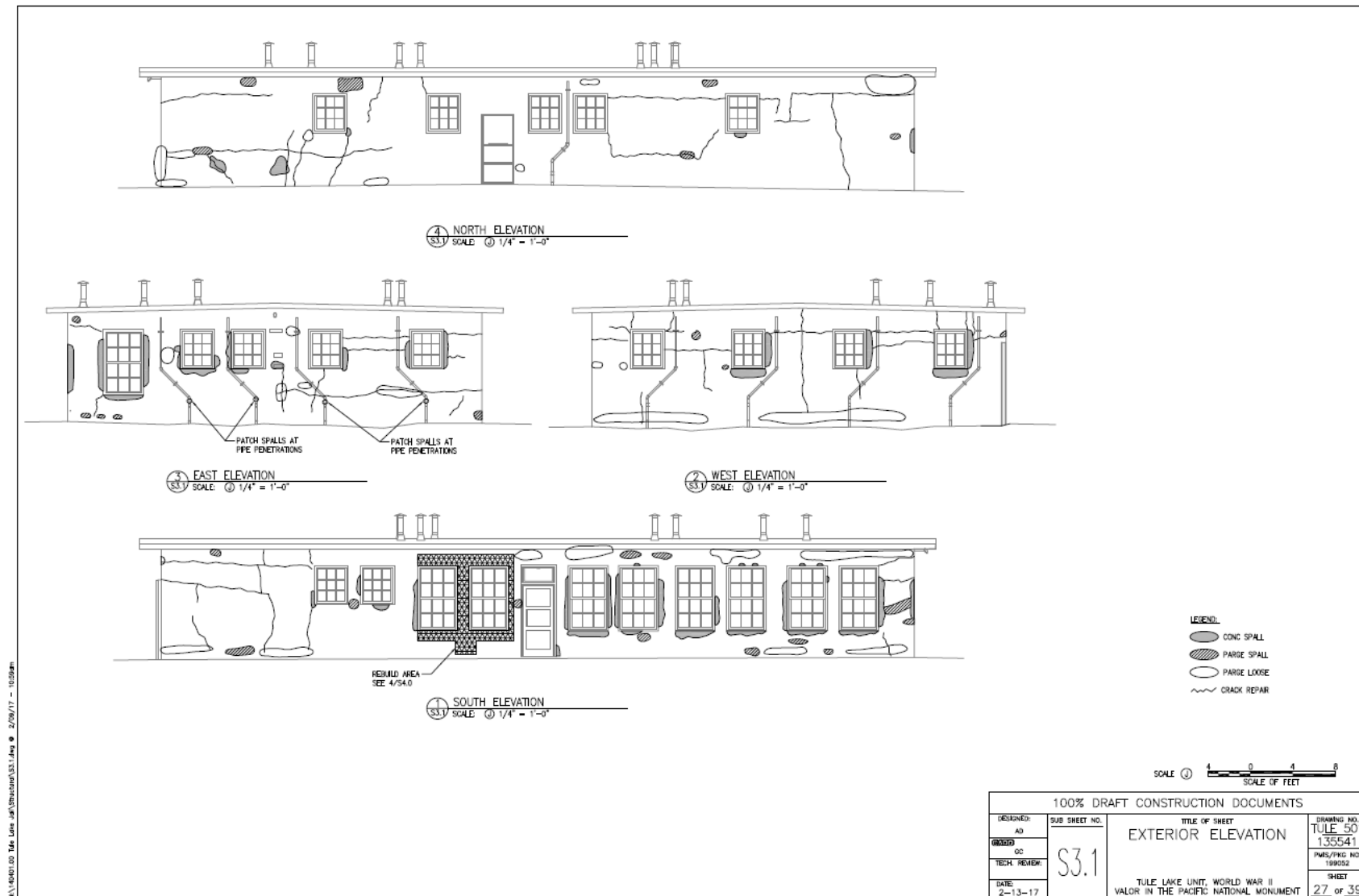
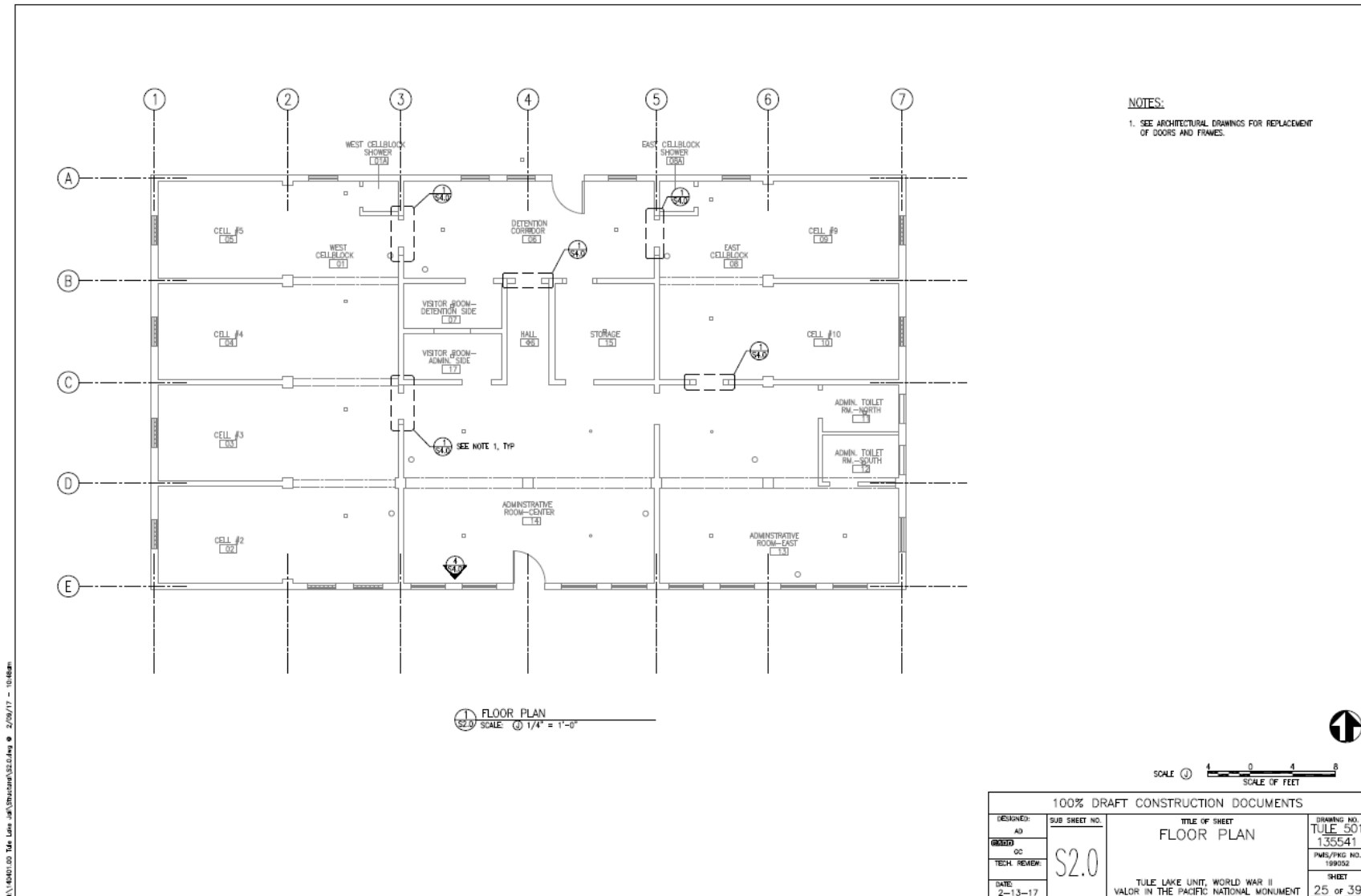


Figure 5: Floor Plan



Wall and Ceiling Surfaces/Architectural: Clean the interior wall and ceiling surfaces as recommended by the Conservator, consistent with the preservation of the historic pencil graffiti. Remove loose concrete and paint and repaint patched wall areas adjacent to the door openings and at cracks to blend with the existing paint to reduce the visual contrast of repairs. Repaint Cells 9 and 10 and the area around the window of Cell 8 where pencil inscriptions are not present.

Wall and Ceiling Surfaces/Structural: Sandblast and treat the exposed rebar with a cement-like anticorrosion coating; repair the weathered areas with mortar patching; form and pour concrete patches through any wall penetrations and damaged walls around the door openings; provide board forms to match the Jail's rustic concrete surfaces; and to inject epoxy to repair select larger cracks on the interior surfaces of exterior walls.

Cell Window Security Bars: The protective stops used to secure the remnants of the original bars and those remnants would be removed and a new wood stop with new bars to replicate the original appearance would be installed.

Interior Wood Doors: Repair the wood framing around doors 7, 8, 10, and 11. Missing doors in these locations would be replaced with new, primed and painted, 3-panel wood stile and rail doors.

Exterior Metal Door: Remove the corrosion on the door and the frame, and would apply a corrosion inhibitive paint. Install a solid metal security door and frame on the north side of the Jail.

Security Doors: Remove corrosion on all doors and frames, replace sheet metal door panels, and paint doors with corrosion inhibitive paint where needed. Reinstall the doors and frames at locations 4, 9, and 12 to their original configuration. The doors at locations 3, 13, and 14 would have wider frames installed with wider doors to provide ADA/wheelchair accessibility.

Cell Doors: Remove all corrosion on six of the existing cell doors and ten side panels (the non-swinging portion of bars on each cell), and coat the doors and side panels with a corrosion inhibitive paint. One new side panel would be constructed to the specifications of the original panels to enhance the authenticity. The cell doors and side panels (minus one to allow access into the north portion of Cell 9) would be reinstalled. To protect existing historic inscriptions, an analysis and treatment recommendations by a conservator would occur prior to installation.

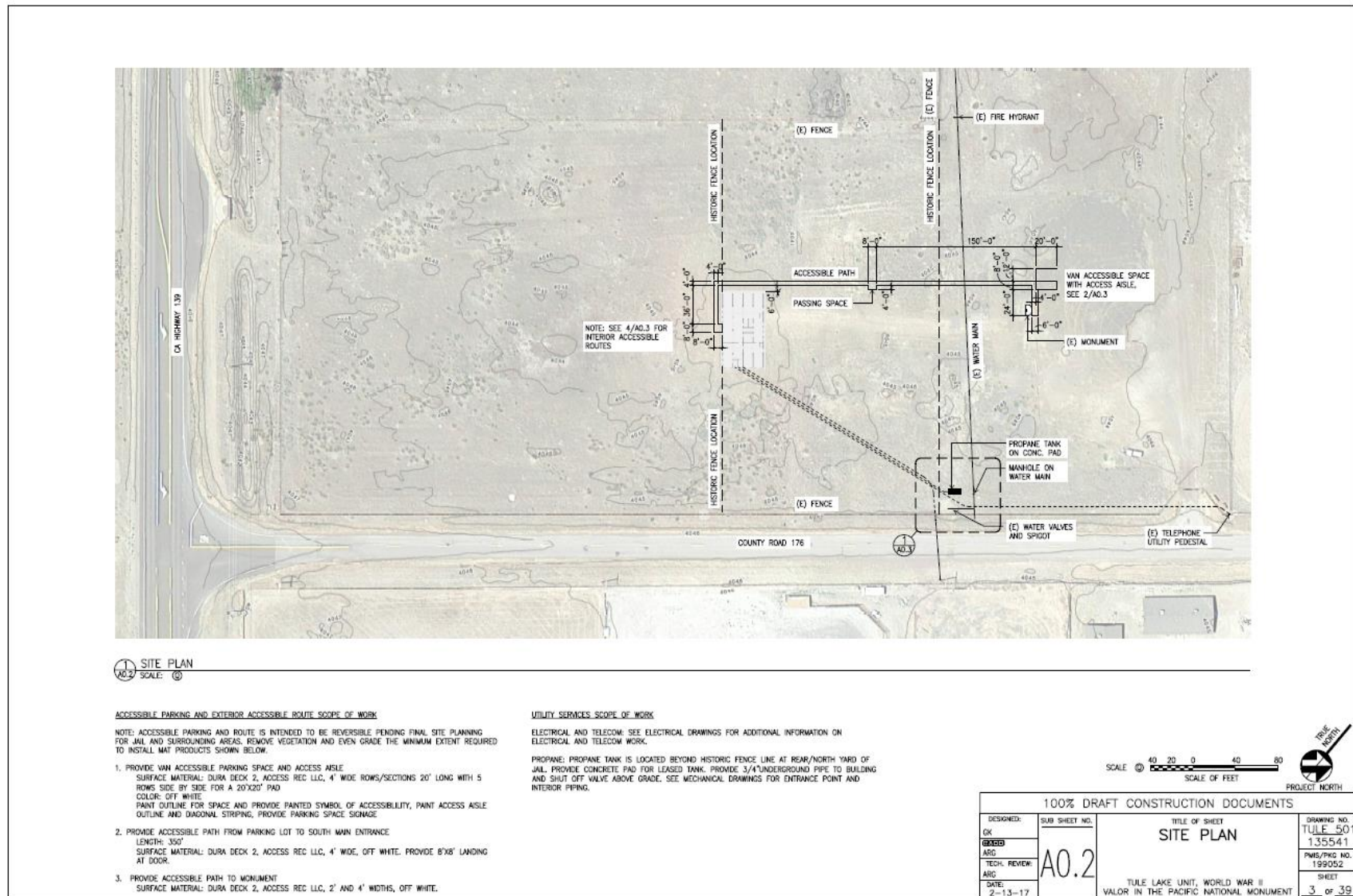
Bunk Beds: Repair and reinstall three existing bunks and one new bunk in Cell 10, and install two new bunks in the north portion of Cell 9 to complete the east cellblock, while leaving space for wheelchair accessibility (that conforms to Architectural Barriers Act requirements).

Plumbing: Research WWII era fixtures to find appropriate antique toilets and sinks. These items would be installed in Cells 9 and 10 in conjunction with the bunks. Although the plumbing would be non-functional, it would replicate the original appearance of the cells.

Electrical and Telecom Systems:

Existing conduit runs would be used to rewire the lighting fixtures and outlets. Lighting fixtures would be replicated in their existing locations. A new main panel would be installed in the original panel location near the storage room and center administrative room.

Figure 6: Landscape Modifications Site Plan



Landscape Modifications

Removal of Freestanding Shed and Chain-link Fence

The freestanding bolt-together shed now providing weather-proofing for the jail would be deconstructed and removed using a crane and other equipment. This would include excavating the 10 footings and filling excavated areas. It would also include removal of a chain-link fence, including its posts and footings, that currently surrounds the structure. Chain-link fence footings would also be filled to match the adjacent grade. The shed would be returned to the California Department of Transportation (CalTrans), the owner.

Accessible Parking and Access

One van-accessible parking space, and an adjacent access aisle and a 4-foot wide path (210 feet long) to the main building entrance on the south side would be constructed. To avoid ground disturbance, both the aisle and the path would be made of interconnected mat material and laid on top of the ground surface. A small tractor (Bobcat) would be used to fill the excavation and to perform minor grading for the proposed temporary accessible parking space and pathway.

Utilities

A backhoe would be used to dig a trench from near County Road 126 for the conduits that would supply power, telecommunications and future security to the jail. Alternative B restoration would include reestablishing power to original jail building to provide for lighting and to run a self-contained heating system. The underground power wires would use an existing conduit run and would be spliced into an existing port alongside County Road 176, a distance of approximately 210 feet (approximately 3.5-foot-deep x 4-foot wide) (about 840 square feet/2,940 cubic feet) (Figure 4: Landscape Modifications Site Plan).

Construction Timing

The construction/restoration period would last approximately eight months. Due to regional climate conditions, construction would occur from April through November. A rotation of various workers would be required to complete construction. Approximately six workers would be onsite, at any given time, during the construction period..

Alternatives Considered but Dismissed

Three schematic design options were reviewed in November 2014. These alternatives were compared and revisions to the scope were made based on design studies and options developed for various components. Although the alternatives included variations for the building interior restoration, eventually the exterior restoration became common to each because the building structure is all-concrete construction. Exterior doors and windows at least partially exist and/or can be repaired. Similarly reinstallation of the existing cell doors and side panels, and the electrical work became common to all.

Exterior design alternatives also included the location of accessible parking and the related length of accessible path to the building. Eventually, the exterior accessible routes and parking improvements were planned as temporary modifications and are fully removable. Interior alternatives included reinstallation and/or modification of doors and related accessible routes, installation of bunk beds, installation of plumbing fixtures, and extent of interior painting.

Among these alternatives were two other alternatives, one of which would have included a full interior and exterior restoration treatment that met The Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) and another which offered minimal restoration of some features.

- **Minimal Restoration**

Based on additional analysis, the minimal restoration alternative did not meet the purpose and need for the project and was therefore dismissed from additional consideration.

- **Full Restoration**

Although full restoration would fully meet the purpose and need for the project, because it would have far greater impacts on the integrity of the structure and would have offered only incremental benefits for much greater cost compared to Alternative B, it was dismissed from additional consideration.

Table 2: Alternatives Comparison Matrix

| Characteristic | Alternative A | Alternative B | Notes |
|---|---|---|--|
| <i>Exterior Modifications</i> | | | |
| Freestanding Shed | Retained | Removed | |
| Chain-link Fence | Retained | Removed | |
| Rodent proofing | Partial | Full | Routine removal of droppings and patching of observed holes would continue to occur. |
| Concrete wall patching | N/A | Yes | |
| Window repair and replacement | N/A | Yes | |
| Roof stabilization and repair | N/A | Yes | |
| <i>Interior Modifications</i> | | | |
| Accessible route through Jail | N/A | Available | |
| Restoration of East Cellblock | N/A | Full | |
| Restoration of Cells 9 and 10 | N/A | Full | |
| Preservation treatment of Historic Graffiti | N/A | Yes | Alternative A: Would eventually be undertaken, but not part of this project. |
| <i>Landscape Modifications</i> | | | |
| Accessible path and parking | N/A | Constructed | |
| Visitor Experience | <ul style="list-style-type: none"> • Weekly tours and tours by appointment • Poor accessibility • Dark, unheated structure, not weathertight | <ul style="list-style-type: none"> • Weekly tours and tours by appointment • Lighted, heated, weathertight structure in good condition • Improved accessibility, including parking and pathway | |

Chapter 3: Affected Environment

Historic Resources and Cultural Landscapes

The Tule Lake Segregation Center is registered as a State Historic Landmark (850-2, 1975) and a National Historic Landmark (NHL) (2006). The Tule Lake Jail is considered to be the most significant contributing resource in the Tule Lake Segregation Center National Historic Landmark (WJE Associates Inc. 2011).

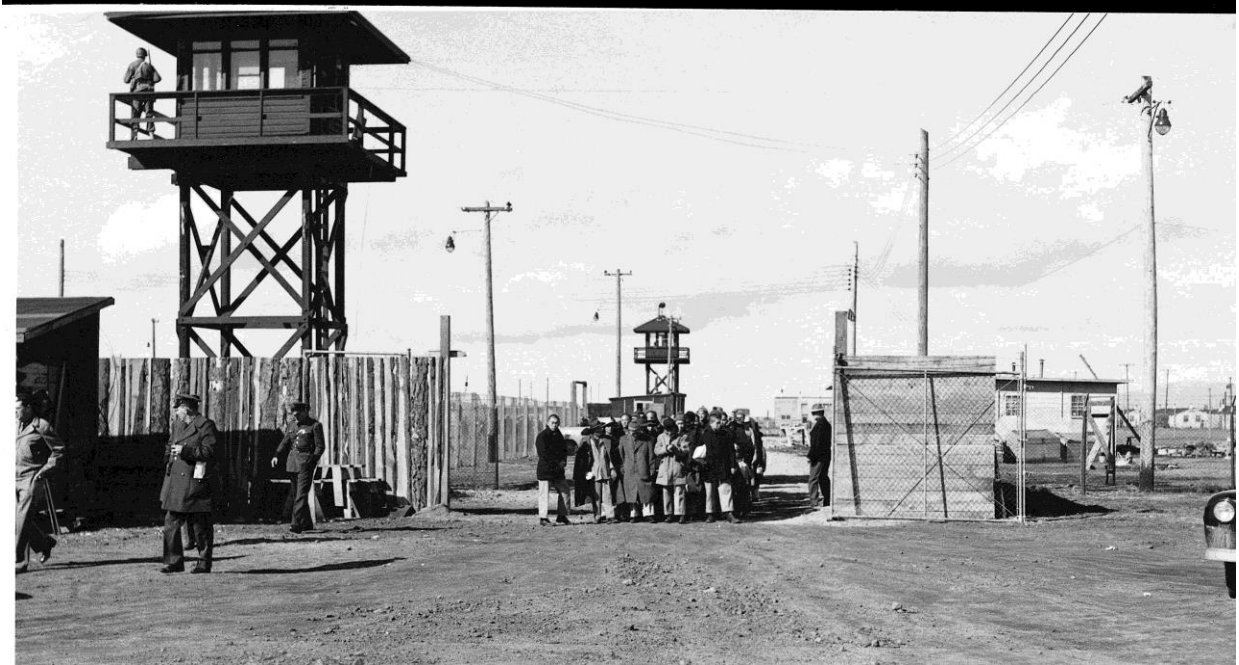


Figure 7: Historic Photograph Showing Stockade with People, Guard Towers, and Jail in Background

Existing Historic Resources and Designations at the Jail Site

Note: The following information was summarized from the *Tule Lake Jail Historic Structure Report, Tule Lake Segregation Center, Newell, CA* (October 19, 2011) (WJE Associates, Inc. et al.).

The Tule Lake Jail is an important physical reminder of the loss of freedom experienced by Japanese Americans during World War II. The jail was constructed by labor crews from the Tule Lake incarcerated; some of whom would later be confined to the jail with or without knowledge of their alleged transgression.

The Tule Lake Segregation Center NHL is comprised of portions of the Center that once were used as the Stockade, the WRA Motor Pool, the Post Engineer's Yard and Motor Pool, and part of the Military Police Compound. The site contains thirty-two resources, of which twenty-five are considered contributing. The jail is part of the Stockade area. In addition to the setting, among the features that contribute to the NHL are elements of the cultural landscape, such as culverts, ditches, and trees.

Of all the buildings at Tule Lake, no building better exemplifies the unlawful incarceration of Japanese Americans than the jail. The primary historical significance of the jail building is related to the development of Tule Lake as the sole segregation center used to separate "troublemakers" from the prisoner population of Japanese incarcerated during World War II, and the role of this structure as the jail within a jail. The integrity of the exterior facades, the interior layout of rooms, the relationship of the jail

to the adjacent stockade area and its place within Tule Lake are the most important physical aspects that convey this significance (WJE Associates Inc. 2011).

The Historic Structure Report describes the jail as a:

Single-story reinforced concrete building, rectangular in plan approximately 39 feet wide by 71 feet long. The shallow pitched gable roof is constructed of a reinforced concrete slab that extends two feet from the face of the outside walls. Windows and doors were originally constructed in simple, untrimmed punched openings. No original doors or windows remain on site; all window and door openings are currently covered with protective plywood panels. The entire structure is covered by a prefabricated light metal canopy structure, and surrounded by a chain link fence within the site security fencing. The protective roof structure and plywood window and door shutters were added by Caltrans in 2004.

The following aspects of integrity were considered as they relate to the Tule Lake Jail:

1. *Integrity of Location:* The jail retains a high degree of integrity of location in relationship to its site because its location is unchanged since its construction in 1944.
2. *Integrity of Design:* The jail retains a high degree of integrity of design. The building retains its original organization, and the exterior facades and primary interior spaces reflect their original design intent. There have been no additions to the structure.
3. *Integrity of Setting:* The jail retains a high degree of integrity of setting. The area surrounding the building, once a shallow lake that was drained by the Bureau of Reclamation, has retained its rural and agricultural uses. The isolated setting of Tule Lake remains unimpaired from the period of significance, and views of Abalone Mountain and Castle Rock, two of the most prominent geologic features visible to the incarcerated, remain unchanged.
4. *Integrity of Materials and Workmanship:* The jail is one of the most permanently constructed buildings at Tule Lake, partially because it was constructed of reinforced concrete and partially as a result of its function. It retains a moderate degree of integrity of materials and workmanship.
5. *Integrity of Feeling:* The jail retains a high degree of integrity of feeling. The building conveys the historic and aesthetic feeling of a jail constructed during the period of significance.
6. *Integrity of Association:* The jail retains a moderate degree of integrity of association. The building is significant primarily for its association with the history of the World War II imprisonment of Japanese American citizens, and the special role of the Tule Lake Segregation Center. The majority of elements and buildings of the Tule Lake Segregation Center are no longer extant, and the jail currently stands alone, within the original *land* and area.

Table 3: Character-defining Features of the Jail

| | |
|--|---|
| Exterior Walls <ul style="list-style-type: none"> • Unadorned parge-coated reinforced concrete exterior walls • Exposed plumbing vent piping mounted to exterior walls • Multi-pane double hung and awning wood windows* • Stile and rail exterior wood door* | Ceilings <ul style="list-style-type: none"> • Exposed concrete ceiling slab • Painted concrete ceiling finish • Vents for coal fired heaters • Locations of light fixtures |
| Roof <ul style="list-style-type: none"> • Exposed overhanging soffit | Interior Doors <ul style="list-style-type: none"> • Stile and rail wood doors and jambs • Metal Security doors and frames** • Cell doors and side panels ** |
| Interior Floors <ul style="list-style-type: none"> • Unpainted concrete floors | Other Features <ul style="list-style-type: none"> • Grille dividing administration and inmate visitation areas • Metal window bars** • Metal bunks** • Electrical conduit embedded in concrete walls and roof slab |

| | |
|---|--|
| | <ul style="list-style-type: none"> Multiple coal-fired heating stoves |
| Walls <ul style="list-style-type: none"> Graffiti of jail inmates on interior walls Board-formed concrete rustication pattern of reinforced concrete walls Painted concrete interior finishes | |

* These features are currently missing, but their presence in the structure as originally constructed can be inferred by existing evidence.

** These features are currently missing, but some were salvaged and have been acquired by NPS for restoration and reinstallation.

Archaeological Resources

Archaeological research determined that Native American Indians have used the Modoc Plateau for approximately the last 10,000 years, with increased activity dating from 6,500 to 4,500 years ago. The analysis of both artifacts and other materials recovered from archaeological sites suggests that prehistoric land-use and settlement patterns appear to have changed over time. The Early Pattern [10,000-3,500 before present (BP)] is characterized by small groups of highly mobile gather-hunters foraging over large areas. This pattern shifts to a strategy characterized by the occupation of seasonal winter villages relying on stored resources during the Middle Period (3,500-2,000 BP) with relatively high residential mobility during the rest of the year. The Late Period strategy (2,500 BP to Euro-American contact) focused on temporary settlements but includes development of more complex and semi-sedentary settlements dependent on stored resources and the repeated use of the same winter areas and villages. Archaeological sites have been found along Highway 139, the site of the historically significant California Trail, Applegate Lassen Emigrant Segment. Highway 139 runs parallel to the southwest property boundary, approximately 500 feet from the jail and 90 feet from the property fence (U.S. Department of the Interior; BLM, 2013).

In 2007, the California Department of Transportation (Caltrans) prepared an archaeological survey and evaluation of most of the subject property, prior to transferring fifteen acres of excess property to the BLM, including the area within the boundary of the Segregation Center and state historic site. One pre-European contact archaeological site was identified that had not been observed during previous studies, but the site was determined by Caltrans to not meet the criteria for inclusion in the National Register of Historic Places or the criteria for listing on the California Register of Historical Resources and that it is not a historical resource for the purposes of the California Environmental Quality Act (CEQA) (CalTrans, 2014).

Human Health and Safety

Hazardous Materials: Lead-Based Paints and Asbestos

SCA Environmental, Inc. (SCA) conducted a pre-renovation hazardous materials survey for lead-based paints (LBP), asbestos-containing construction materials (ACM), and associated environmental hazards at the jail building (June 2014). Sampling by SCA Environmental found ACM in transite wallboard and debris at the inmate and guard toilet areas and debris on exterior grounds outside various windows. Sampling by SCA Environmental also found LBP on the former window bars and the former bed frames.

Other Health Risks: Hantavirus Pulmonary Syndrome (HPS)

According to NPS staff, rodent feces are regularly cleaned from the jail to avoid the potential presence of Hantavirus. Infection with Hantavirus can progress to HPS, which can be fatal. People become infected through contact with hantavirus-infected rodents or their urine and droppings. Rodent control remains the primary strategy for preventing Hantavirus infection.

Cases of HPS occur sporadically, usually in rural areas where forests, fields, and farms offer suitable habitat for the virus's rodent hosts. Barns, outbuildings, and sheds are potential sites where people may be exposed to the virus. When fresh rodent urine, droppings, or nesting materials are stirred up, tiny droplets containing the virus get into the air. This process is known as "airborne transmission." The virus is mainly transmitted to people when they breathe air contaminated with the virus. Construction, utility and pest

control workers can be exposed when they work in crawl spaces, under houses, or in vacant buildings that may have a rodent population.

Recent research results show that many people who became ill with HPS developed the disease after having been in frequent contact with rodents and/or their droppings around a home or a workplace. On the other hand, many people who became ill reported that they had not seen rodents or rodent droppings at all. Therefore, sites where rodents can occur should be kept clean to inhibit contraction of Hantavirus (Centers for Disease Control and Prevention, 2014). All cases of Hantavirus infection are required to be reported to the CDC.

Security, Emergency Services and Visitor Protection

The entire Tule Lake Segregation Center property is enclosed with a six-foot tall chain-link fence topped with three strands of barbed wire. Access points to the property, the jail area and building are gated and locked.

Similar to the unincorporated town of Newell, law enforcement for the site is provided by the dispatches from the Modoc County Sheriff's Department and/or the California Highway Patrol (CHP). NPS rangers also may respond to law enforcement needs at the site.

The Tulelake Fire Department provides fire protection services to the town of Newell, CA and would continue to provide services for the Segregation Center.

Visitor Experience

The Tule Lake Segregation Center is on federal land that is not publicly accessible without NPS staff. The jail is not open to the public except with a guided tour. Guided tours are available on Saturdays from Memorial Day weekend through Labor Day weekend. The jail capacity has been set at 20 visitors including NPS staff; however, tour groups are typically limited to 10 guests. The exterior of the jail also can be viewed from off-property locations along Highway 139 and County Road 176.

The jail is a gray single-level, flat roofed, cement structure in the eastern portion of the property. White painted boards cover the windows. A freestanding A-frame steel shed currently protects the entire building from adverse weather conditions.

Tours begin at the jointly operated visitor center at the Tulelake-Butte Valley Fairgrounds Museum and last approximately two hours. Depending on staffing and availability, groups larger than 20 or those unable to attend a Saturday tour can make other arrangements.

The Tule Lake Segregation Center Visitor Center is located approximately 7 miles north of the jail on the fairgrounds in Tulelake. The jointly run visitor center is open to the public from Memorial Day weekend through Labor Day weekend, and is staffed. From October through Memorial Day, the visitor center is not staffed, but the public may view the exhibits and pick up maps and brochures Monday through Friday during business hours. The visitor center offers visitors opportunities to see half of a barrack and additional exhibits and artifacts from the incarceration during WWII.

Every two years the Tule Lake Segregation Center hosts an event that honors the memory of Japanese Americans incarcerated in the maximum-security Tule Lake Segregation Center during World War II. The Tule Lake Committee organizes these biennial pilgrimages to the Tule Lake site. Its mission is to educate the public and to preserve the history of the WWII incarceration of Japanese Americans, and specifically, that of the Tule Lake site, a maximum-security segregation center that imprisoned Japanese Americans who resisted their incarceration. Attendance at the Pilgrimage varies. In 2012, 400 people participated.

Motorists on Highway 139 and County Road 176, residents and visitors of Newell, CA, users of the Tulalake Airport, and visitors to the east portion of the Tule Lake Wildlife Refuge can all see the jail. The California State Highways monument on State Highway 139, which is directly in front of the jail, was once part of the stockade. Another wayside about the Tule Lake Unit of WWII Valor in the Pacific NM is located on Count Road 176.

Chapter 4: Environmental Consequences

Introduction

Cumulative Effects

Cumulative effects/impacts on the environment result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (federal or nonfederal) or person undertakes such action. Cumulative effects can result from individually minor, but collectively significant, actions taking place over a period of time. Therefore, it is necessary to identify other past, present, and reasonably foreseeable future projects that could result in cumulative impacts. The geographic scope of the analysis includes actions throughout the park, as well as on surrounding lands where overlapping resource impacts are possible within the next 10 years. Several past and ongoing projects could contribute to cumulative effects.

In addition to restoration of the jail, the analysis includes cumulative effects related to implementation of the:

- Tule Lake Unit of World War II Valor in the Pacific Proposed General Management Plan (2016), which would be implemented upon approval, over time, as funding and resources permit. Included in the GMP is restoration of other areas within the NPS-owned portion of the Tule Lake Unit, including other parts of the stockade.
- Tule Lake Strategic Plan (2013), which preceded planning for the GMP and provided interim direction for managing the park unit.

The primary focus of the GMP is to emphasize raising national awareness about the Tule Lake Unit's unique incarceration, segregation, and renunciation history and its resources. The key components of the selected alternative are as follows:

- Historic resources would be protected through stabilization and historic preservation treatments, and select features in the stockade area would be delineated or reconstructed.
- Visitors would have year-round opportunities to learn about Tule Lake through immersion in the historic scene, interaction with NPS interpretive staff, and self-guided opportunities.
- Interpretive and educational programs would emphasize engaging youth and providing in-depth historical information.
- Technology and digital media would be used extensively to introduce Tule Lake to new audiences on the web and to entice them to visit, and would be a key component to telling Tule Lake's story onsite.
- The Unit would seek out, cultivate, and sustain partnerships with a variety of local and national organizations to both protect the site and communicate the history, significance, and relevance of the Tule Lake story.

Historic Resources and Cultural Landscapes

Impacts from Alternative A

Under Alternative A, there would continue to be a range of adverse effects on historic resources, including the jail and its contribution to the cultural landscape associated with the Tule Lake Segregation Center NHL. The jail exterior would not be restored and although available historic artifacts would be retained and preserved, they would not be restored to the building. Proposed conservation treatments for the preservation of the historically and culturally significant graffiti would not be undertaken as part of the proposed action. In addition the existing steel exterior shed structure would remain for an indeterminate time.

According to the HSR, the building is in “fair-to-poor” condition with parts of the building missing or damaged:

There is extensive cracking of the parge-coated concrete exterior; windows and doors are all missing and the remaining exposed wood elements at the window sills have some significant localized deterioration; the roof edge has deteriorated significantly exposing the reinforcing bar; the roofing is completely missing. On the interior, all window bars have been removed, and all wood doors are missing. Steel security doors, cell bars, and bunk beds are missing, but some were salvaged and are available for reinstallation. At one point, it appears as though demolition of the structure with heavy equipment was begun, but discontinued. The damage from this event was confined to a small area at the northwest corner and a window pilaster at the south façade (WJE, Inc. 2011:73).

Because these conditions would continue without a plan for stabilization, rehabilitation or restoration that meets the Secretary of the Interior’s Standards for the Treatment of Historic Properties (Standards), there would continue to be adverse effects on the building and its contents as an historic resource, as well as on its contribution to the Tule Lake Segregation Center NHL.

Impacts from Alternative B

The jail building would undergo complete exterior restoration and some partial and some complete interior restoration. Both restoration and rehabilitation would be undertaken, and would be consistent with the Standards. Conducting these activities in accordance with the Standards would ensure that the building retains, as much as possible, its distinctive materials, features, spaces, and spatial relationships. Restoration of the exterior and of the East Cellblock and Cells 9 and 10 would be undertaken, while rehabilitation instead of restoration would allow for improved interpretive use of the building, including improvements to increase accessibility and to accommodate visitor use. This would include some modifications to the interior, such as widening doorways to accommodate wheelchairs and not reinstalling one of the cell doors.

Interior repair, preservation, acquisition and installation of interior features such as bunks, cell doors, cell panels, and various nonfunctioning plumbing fixtures would be undertaken. In conformance with the Standards, replacement of missing features would be substantiated by documentary, physical, or photographic evidence.

Construction of an accessible path, sidewalk and parking would use temporary prefabricated materials that would be installed on the surface and would be fully removable pending additional investigation of cultural landscape character-defining features and additional archeological survey in the area. Because all work associated with the restoration, including conservation treatments for the graffiti, would be conducted under the Standards, there would be no adverse effect on historic resources or cultural landscapes.

Measures to Avoid, Minimize or Mitigate Impacts

- There would be ongoing consultation with subject matter experts, who would review restoration plans to ensure that all restoration activities adhere to the Secretary of the Interior’s Standards for the Treatment of Historic Properties. Rehabilitation would also adhere to the list of proposed actions presented to and concurred with by the State Historic Preservation Office (SHPO) (NPS_2014_0721_002, February 26, 2018). If modifications are needed, additional SHPO consultation would occur.
- The park would continue to consult with the NPS regional historical architect as plans are finalized and during construction for review of the preservation plan the contractor is required to provide and to review any changes as needed
- Placement of the accessible walkway and parking would be temporary until additional analysis is undertaken to determine whether these would interfere with character-defining features of the cultural landscape.

- Documentation of rehabilitation would occur through Historic American Buildings Survey (HABS) recordkeeping.
- Conservation planning for historic graffiti would include the following steps: laboratory analysis of paint substrates to determine composition, testing solubility of black paint and crayon so as not to damage graffiti with the application of a consolidant, and testing additional consolidant products that are compatible with the identified paint type through on-site mock-ups. Additional analyses and treatment recommendations by a concrete conservator would also be undertaken to finalize the conservation plan.
- Selection of accessible trail material and associated color would blend with the surrounding landscape and be compatible with the historic character of the NHL.
- A barrier would be provided during construction to protect the graffiti areas.
- The contractor would develop a Conservation Plan that would be submitted to the NPS prior to starting work.

Cumulative Impacts

Historic structures and cultural landscapes suffered damage or loss during delayed preservation maintenance as a result of neglect or damage for more than 60 years following the historic period. Prior to and since the park's establishment, a small number of actions have been undertaken to stabilize historic structures and buildings, including the placement of the steel shed over the jail by CalTrans. Although there has been no cultural landscape inventory to date, it is likely that the overall condition of would be identified as "poor" because of the loss of historic resources and because remaining structures show clear evidence of major disturbance and rapid deterioration by natural and/or human forces.

There would continue to be cumulative adverse effects on historic resources, including deterioration and loss of historic fabric from implementation of Alternative A due to ongoing deterioration of the historic jail building. Although the exterior steel shed has protected the building from some deterioration, its long-term use under Alternative A would continue to contribute to adverse effects on the cultural landscape from the use of this modern superstructure and its relationship to other extant features from the period of significance. For instance, the flat roof of the jail is somewhat obscured by the gabled roof of the freestanding shed. Planned rehabilitation and restoration under the Standards in Alternative B would have no adverse effect on historic resources or cultural landscapes. Actions undertaken in Alternative B would arrest longstanding deterioration currently occurring in Alternative A, contributing to cumulative beneficial effects on historic resources and the cultural landscape.

Conclusion

There would continue to be adverse effects on historic resources and cultural landscapes from implementation of Alternative A. Alternative B would have no adverse effect on historic resources or cultural landscapes.

Archaeological Resources

Alternative A

There would be no additional impacts to known archaeological resources from the implementation of Alternative A. Documentation of archaeological resources from surveys to date has not found artifacts in the vicinity of the jail. Because, however, subsurface surveys have not been undertaken, it is possible that buried resources related to the historic or prehistoric period are present. Because continued maintenance of the site would avoid ground disturbance, it would not result in impacts to known archaeological resources and would therefore continue to have *no effect* on archaeological resources.

Alternative B

Proposed ground disturbance associated with Alternative B would include trenching for utility lines (approximately 210-feet long x 4-feet wide x 3.5-feet deep) (about 840 square feet/2,940 cubic feet) and surface grading of previously disturbed areas for the parking lot and driveway, which would disturb approximately 600 square feet. Ground disturbance would also include excavation to remove the

freestanding shed footings (16 cubic feet) for each of ten footings and compaction of the area near the jail building during removal of the shed structure and during restoration operations. It would also require ground disturbance for the removal of the footings associated with the chain-link fence.

Although the area has been surveyed, previously undocumented historic or prehistoric archaeological resources could be present (including artifacts related to the building's construction) and could be discovered during any earth work. Previously undiscovered historic archaeological resources would also likely contribute to the cultural landscape. Because there would be ground disturbance and because that ground disturbance could affect presently unidentified historic and/or prehistoric archaeological resources that would subsequently be subject to additional evaluation and mitigation measures (see below), there would be no adverse effect on archaeological resources.

Measures to Avoid, Minimize or Mitigate Impacts

Based on the NPS Programmatic Memorandum of Agreement with the Association of State Historic Preservation Officers and the Advisory Council (NPS et al. 2008), the following measures would be included in the proposed project (as appropriate to the alternative actions) to minimize impacts to archaeological resources:

- Ground disturbance during construction would be monitored by an archaeologist, qualified under the Secretary of the Interior's Standards for Professional Qualifications.
- If archaeological resources are uncovered during construction, work would be halted in the discovery area, and the find evaluated according to National Register of Historic Places eligibility.
- Work would cease until the find is evaluated and action taken to avoid or mitigate the impact (as directed by the onsite archeologist).
- Work outside the area of the find could continue with appropriate archaeological monitoring.
- If archaeological resources are found, project implementation would be modified to avoid further impacts. If this is not possible, as much information as possible would be collected about the site in accordance with applicable laws and regulations and additional consultation with applicable agencies and tribes would occur as specified in the implementing regulations for Section 106 of the NHPA.
- Procedures outlined in the Native American Graves Protection and Repatriation Act (NAGPRA) would be followed in the unlikely event that human remains or any objects protected under NAGPRA are exposed. This would include the potential need to stop work in the area for a minimum of 30 calendar days. As with other potential discoveries, work could proceed in unaffected areas (as determined by the monitoring archeologist).

Cumulative Impacts

Historic archaeological resources at the Tule Lake Segregation Center NHL have primarily been adversely affected by major changes to the site since closure of the site when the period of significance ended in 1946. Among these changes include demolition of most buildings and structures and conversion of the area to homesteading and farming as part of the Newell townsite. Portions of the site owned by other federal agencies (USFWS, BLM, and CalTrans) have also been adversely affected from removal and alteration of buildings, structures and artifacts not considered of historic value until protection was effected for a small part of the site in 2008 with its designation as part of World War II Valor in the Pacific National Monument. Providentially, placement of the freestanding shed by CalTrans a few years before that (2004) contributed to saving the jail from a great deal of additional deterioration.

Resources in the area have continued to be affected by lack of preservation maintenance and funding for structural rehabilitation. Even now, most of the former site has lost the characteristics associated with its use and many of these have been obscured by new development. This has likely resulted in long-term cumulative adverse effects on both historic and prehistoric archaeological resources (before the advent of preservation laws). Because the alternatives would preserve future finds of prehistoric and historic archaeological resources, cumulative beneficial effects from future actions are anticipated. Compared to

the loss of archaeological resources from past action, future actions would have no effect or no adverse effect on archaeological resources.

Conclusion

There would be no additional impacts on archaeological resources under Alternative A. Alternative B actions would avoid known archaeological resources, but would have the potential to disturb previously unidentified archaeological resources during ground disturbance. Because monitoring of ground disturbance would occur and work stopped and evaluated/moved to a non-sensitive site if resources were found, anticipated actions would be unlikely to affect (have no adverse effect on) archaeological resources.

Human Health and Safety

Alternative A

There would be no additional contributions to and no release of hazardous materials known to contain asbestos (ACM) and lead based paints (LBP) because these would be retained in place where they occur within and near the jail. Without rehabilitation, these materials would continue to deteriorate. In place, they do not currently pose imminent hazards to visitors or employees because they would not be breathed (ACM) or inhaled/ingested (LBP).

There would continue to be risks to employees and others who enter unoccupied parts of the jail when rodent droppings accumulate from the potential for HPS. Because droppings are routinely removed and areas cleaned according to established safety plans, (Strategic Plan/draft GMP), this hazard would continue to be small.

Alternative B

Asbestos: Removing materials from the jail that contain asbestos, including from the transite wall board at the inmate shower stalls and guard toilet rooms, and debris on exterior grounds outside various windows would reduce opportunities for ACM to be released and for employees and contractors to inhale the dangerous fibers.

Removal of ACM would be conducted in accordance with existing laws, including packaging and disposing of ACM in leak-proof containers or wrapping and disposing of waste at an approved/licensed disposal site. Human health and safety practices for removing regulated ACM would also be followed, including adherence to the zero visible air emissions standard for asbestos removal. Non-regulated ACM could be disposed of in landfills that accept ordinary demolition waste (Environmental Protection Agency, 2004).

Lead Based Paints: Construction and demolition workers would be exposed to LBP contamination by cutting, scraping, sanding, heating, burning, or blasting LBP from building components, metal bridges and metal storage tanks. In addition to exposing workers, lead-based paint debris or dust can also make its way into soil, potentially contaminating nearby surface waters.

Lead poisoning is a serious health threat for adults and is especially damaging to young children. It can cause anemia, reproductive disorders, and damage to the kidney, liver, and brain. As a result, specific requirements that prevent the release of LBP would be adhered to its removal from surfaces in and near the jail. As with ACM, lead-based paint waste from removal or remediation activities, such as debris, paint chips, dust, and sludge that exhibit the toxicity characteristic must be managed and disposed of as a regulated Resource Conservation and Recovery Act (RCRA) hazardous waste. Controlling hazardous waste from the "cradle-to-grave" has resulted in requirements regarding the generation, transportation, treatment, storage, and disposal of LBP materials. Adhering to these measures would reduce the likelihood of exposing employees, contractors and the environment to LBP.

Rodent Droppings (Hantavirus Pulmonary Syndrome): Employees and contractors present during project work could be exposed to Hantavirus. Airborne dust and debris during construction and demolition would subject these individuals to a higher risk for contracting Hantavirus. As in Alternative A, the park and its contractors would continue to adhere to safety requirements for the treatment and disposal of rodent droppings to prevent the transmission of HPS (Centers for Disease Control and Prevention, 2014), however additional measures to systematically clean areas in the jail would be undertaken prior to beginning other project work. As a result, exposure to this risk would further diminish.

Measures to Avoid, Minimize or Mitigate Impacts

- To reduce or avoid impacts from the removal of LBP and ACM, the removal, collection, and disposal of hazardous materials would conform to the standards and practices outlined in the RCRA [42 U.S.C. §6901 et seq. (1976)].
- Specific measures would be taken to ensure that lead-based paint debris or dust does not make its way into the soil, potentially contaminating surface waters or becoming fugitive dust.
- The Modoc County Air Pollution Control District would be notified of the presence of ACM in the jail and the park and its contractors would adhere to specific work practices to prevent the release of ACM.
- Work requirements would specify appropriate removal, handling, clean-up procedures, and time schedules, as well as the appropriate storage, disposal, and landfill requirements for asbestos-containing waste materials. All contractors would be required to maintain records, including waste shipment records, and would be required to use appropriate warning labels, signs, and markings.
- Prior to work to restore the interior of the jail, cleaning of all rodent droppings to reduce the risk of the spread of Hantavirus would occur.
- Pest management, including cleaning the interior of the building would continue to occur on a case-by-case basis (Alternative A). When pest infestations are recognized, they are cleaned per monument protocol, taking care not to clean any part/portion of the interior walls.
- The park would continue to follow its Integrated Pest Management Plans to reduce the potential for pests to transmit Hantavirus.

Cumulative Impacts

The potential for cumulative adverse effects would continue under Alternative A from the LBP outside the jail facility in deteriorated painted surfaces, which could continue to, under the right conditions, leach into nearby soil and be transported during water runoff. Without disturbance, there would be no current contribution to the potential for cumulative impacts from ACM or rodent droppings. Implementation of Alternative B would result in cumulative beneficial impacts from the proper containment, storage and disposal of ACM and LBP and from lowering the risk of HPS.

Conclusion

The potential for additional deterioration and transport of LBP would continue under Alternative A. Similarly, because the building would not be made rodent proof in Alternative A, the potential for transmission of Hantavirus would continue and would continue to be mitigated by routine cleaning of droppings based on current IPM plans. Under Alternative B, the risks of exposure to ACM and LBP would increase during construction activities but would be mitigated by project actions in conformance with existing laws. Long-term risk of HPS would end with rodent-proofing of the structure. Similarly long-term exposure to ACM and LBP would end with restoration.

Visitor Experience

Alternative A

The protective shed roof covering the jail would remain. This freestanding shed would continue to obstruct views of the building and the cultural landscape from Highway 139, which is eligible for California Scenic Highway designation (California Department of Transportation, 2013). Although

weekly and other occasional guided tours of the Segregation Center would continue, the deteriorated building condition, including lack of representative furnishings (doors, bunks, bars, toilets, etc.) would also continue to hamper visitor understanding of the site.

Because accessibility improvements would not be made, the building and its environs would continue to present problems for people with mobility access problems, resulting in long-term adverse effects on the experience on these visitors and their families.

Alternative B

Under Alternative B, the jail building would undergo restoration to seal the structure from the elements (wind, rain, snow, etc.). The protective shed would be removed and the jail would be restored to its original appearance using the same materials and finishes. Structural repairs would be visibly seamless and would not alter the aesthetic qualities of the jail. Views of the jail from nearby areas, including Highway 139, Newell and Tule Lake NWR, would be improved by restoration of windows to the building and removal of the shed roof, resulting in long-term beneficial effects on visitor experience, including aesthetics.

During construction, the jail and its environs would be closed to visitor access, resulting in short-term reduced visitor access (approximately eight months), an adverse effect on visitor experience. Afterwards, visitors would visit a structure with a fully restored exterior and partially restored/rehabilitated interior, leading to improved understanding and enjoyment.

There would also be long-term beneficial effects on the visitor experience from reinstallation of both historic and historically accurate replica windows, doors, cell bars, and plumbing fixtures. The presence of these items and restored areas inside the jail would increase learning and interpretation opportunities consistent with protecting the historical significance of the building. Conservation treatments for the graffiti would allow visitors to observe this area more closely well into the future. Similarly, accessibility improvements to the building, including construction of adjacent parking and pathways and access within the building, would offer improved options for visitors with mobility and other physical conditions. Although visitors would still be required to be part of ranger-guided tours, the comfort of visitors on those tours would improve, with the restoration and rehabilitation of the building. It would be a weather-tight lighted and minimally heated structure.

With the restoration of the jail and improved accessibility, visitation would be expected to increase slightly. As a result, there would be both short-term adverse and long-term beneficial effects on visitor experience, while some aspects of the visitor experience (the need to visit the building on a guided tour) would remain unchanged.

Measures to Avoid, Minimize or Mitigate Impacts

- As noted under historic structures and cultural landscapes, conservation treatments for the graffiti and building restoration/rehabilitation would be undertaken in conformance with the Secretary of the Interior's Standards.
- Under Alternative A, to protect the sensitive and fragile pencil inscriptions/graffiti inside the jail building, prior to entry, visitors and staff are alerted that under no circumstances should any part or portion of the walls be touched or altered. Measures would continue to be undertaken to limit the ability of visitors and staff to come into close proximity or contact with the walls. These measures could include, but would not be limited to, hanging or installing physical barriers or limiting visitor use to one discreet area.

Cumulative Impacts

Despite the conversion of much of the former Tule Lake Segregation Center to other land uses and intentional removal of buildings and facilities upon closure of the Center, there are now opportunities to experience the area and to understand its significance. More than 70 years following its abandonment, the

Tule Lake Unit of War in the Pacific NHP offers visitors glimpses of incarcerated life and the incarcerated's resilience in adjusting to the harsh area they found themselves in. Though there have been many changes to the site over time, the opportunity for the NPS to provide and visitors to experience the site through additional visitor services, including rehabilitation of structures is possible. Combined these would continue to be cumulative beneficial effects on visitor experience. Alternative A would not contribute to enhancing the visitor experience at the site, and except for the small degree of visitor services now available it would continue to have some adverse effects on visitor use opportunities, including the ability to experience portions of the site as it once was. With the restoration of the jail and improvements to accessibility, Alternative B would have a range of cumulative beneficial effects on visitor experience at the Tule Lake Segregation Center.

Conclusion

There would be no additional impacts under Alternative A. Adverse effects on visitor experience would continue to occur from ongoing deterioration of the jail and evidence of this by retention of the shed over the building, including from its visual effects from surrounding viewpoints. The poor condition of the building interior would also continue to adversely affect visitor experience. With restoration in Alternative B of the exterior of the building and a combination of restoration and rehabilitation, including accessibility improvements on the interior, there would be long-term beneficial effects on visitor experience, including on visitor use opportunities and aesthetics.

Table 4: Impact Comparison Chart

| Resource | Alternative A | Alternative B |
|--|--|---|
| Historic Structures and Cultural Landscapes | <i>Adverse effect</i> from continued deterioration of jail building and from deterioration of graffiti and lack of conservation of other original site furnishings from the jail. | <i>No Adverse Effect</i> from restoration of the exterior of the building and restoration and rehabilitation of the interior and placement of temporary accessibility structures according to the Secretary of the Interior's Standards. Long-term beneficial effects from improving the condition of the building and removing the freestanding shed. |
| Archaeological Resources | <i>No effect</i> from no ground disturbance based on current management of the site. | <i>No adverse effect</i> from monitoring ground disturbance and avoiding potential sites if found and from adherence to Secretary's Standards and other laws that would protect potentially undiscovered archaeological resources. |
| Human Health and Safety | Potential for adverse effects from asbestos-containing materials (ACM) present but undisturbed. Adverse effects from lead-based paint (LBP) deteriorating and leaching into soil around structure. Potential for contracting Hantavirus from the routine need to remove rodent droppings common in building. | Long-term beneficial effects from removing ACM and LBP using required employee and contractor safety precautions. Similar beneficial effects from treatment of these materials in accordance with regulations regarding their removal, storage and disposal. Long-term beneficial effects from Hantavirus risk removed due to rodent-proof, weather-tight building. |
| Visitor Experience | Continued long-term beneficial effects from ranger-guided tours of Segregation Site and Jail building. Ongoing adverse effects from poor condition of building under freestanding shed roof visible from nearby eligible scenic Highway 139 and used on tours. Limited accessibility to site and building. | Long-term beneficial effects from continued ranger-guided tours of Segregation Site and Jail building in restored (exterior) and restored and rehabilitated (interior) condition. Shed roof removed and flat roof and overhang of building evident Building repaired with suitable historic materials and historic or replica furnishings in some areas. Opportunities for accessibility of building and access to it improved. |

Chapter 5: Consultation and Coordination

Agency Consultation

California State Historic Preservation Office

Letters to begin SHPO consultation on the project were sent in May 2014 and July 2015. Comments from the SHPO guided proposed rehabilitation design development. The SHPO concurred with the Area of Potential Effects on April 11, 2016. The SHPO was provided with at least two iterations of design development drawings for the building (October 2016, February 2017). A formal request for concurrence with the determination of *no adverse effect* on the characteristics that allowed the Tule Lake Segregation Center site to be listed as a National Historic Landmark on the National Register of Historic Places was sent on January 19, 2018. Concurrence with this determination of effect for the proposed rehabilitation of the jail was received on February 26, 2018 (NPS_2014_0721_002).

Native American Indian Tribe Consultation

The NPS conducted tribal consultation with The Klamath Tribes and the Modoc Tribe of Oklahoma. Meetings with the Modoc Tribe of Oklahoma were held in May 2015, April 2016, and most recently in person in Oklahoma on May 6, 2017. Meetings with The Klamath Tribes included a series of phone calls between 2015 and 2017 and a formal meeting in February 2017. Neither tribal consultation resulted in expressed concerns; however, the tribes did request that a monitor be present during ground disturbing activities to prevent damage to any previously undocumented prehistoric cultural material.

U.S. Fish and Wildlife Service

There would be no effect on any species listed or proposed as threatened or endangered, therefore no further consultation is necessary under Section 7 of the Endangered Species Act.

Accessibility Evaluation and Consultation

The park conducted an Accessibility Self-Evaluation and Transition Plan (SETP) to evaluate how to improve accessibility parkwide in 2014-15 in accordance with implementation of the Architectural Barriers Act of 1968 (ABA), which requires that any building or facility designed, constructed, altered, or leased with federal funds be accessible and usable by any individuals with disabilities. Because planning for the rehabilitation of the jail was underway during this assessment, accessibility issues were incorporated into the restoration of the Tule Lake jail from the beginning. This included evaluation by the regional accessibility coordinator and an accessibility analysis for the jail prepared by the architectural and engineering firm preparing the draft design documents. During the public review period, additional consultation will occur to ensure that proposed modifications to the jail and access to it to accommodate accessibility are incorporated and meet ABA standards (the Architectural Barriers Act Accessibility Standards [ABAAS]), while ensuring no adverse effect to the character-defining features

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Acronyms and Abbreviations

| | |
|--------|--|
| ACHP | Advisory Council on Historic Preservation |
| ACM | Asbestos Containing Materials |
| ADA | Americans with Disabilities Act |
| APE | Area of Potential Effect |
| BMP | Best Management Practice(s) |
| CDC | Centers for Disease Control |
| CHP | California Highway Patrol |
| EA | Environmental Assessment |
| ESA | Endangered Species Act |
| FCAA | Federal Clean Air Act |
| FONSI | Findings of No Significant Impact |
| GEPA | Golden Eagle Protection Act |
| HPS | Hantavirus Pulmonary Syndrome |
| HSR | Historical Significance Report |
| LBP | Lead-Based Paints |
| MBTA | Migratory Bird Treaty Act |
| MCAPCD | Modoc County Air Pollution Control District |
| NEPA | National Environmental Policy Act |
| NHL | National Historic Landmark |
| NHPA | National Historic Preservation Act |
| NPAB | Northeast Plateau Air Basin |
| NPS | National Park Service |
| NRHP | National Register of Historic Places |
| RCRA | Resource Conservation and Recovery Act |
| SCAPCD | Siskiyou County Air Pollution Control District |
| SUP | Special Use Permit |
| SWPPP | Stormwater Pollution Prevention Plan |
| USFWS | U.S. Fish and Wildlife Service |
| USGS | United States Geological Survey |

Chapter 6: References

- Architectural Resources Group. (2014). Tule Lake Segregation Center Historic Jail Restoration; Schematic Design Preferred Alternative; Site Plan. San Francisco, CA.
- California Department of Conservation. (2010). *2010 Geologic Map of California*. Retrieved from [quake.ca.gov: http://www.quake.ca.gov/gmaps/GMC/stategeologicmap.html](http://www.quake.ca.gov/gmaps/GMC/stategeologicmap.html)
- California Department of Conservation; California Geologic Survey. (2002, December). *California Geomorphic Provinces - Note 36*. Retrieved from [Conservation.CA.gov: http://www.conservation.ca.gov/cgs/information/publications/cgs_notes/note_36/Documents/note_36.pdf](http://www.conservation.ca.gov/cgs/information/publications/cgs_notes/note_36/Documents/note_36.pdf)
- California Department of Transportation. (2013). *2013 Traffic Volumes on California State Highways*. Retrieved from <http://traffic-counts.dot.ca.gov/>: http://traffic-counts.dot.ca.gov/docs/2013_aadt_volumes.pdf
- California Department of Transportation. (2014, May). *Draft State Route Transportation Concept Report*. Retrieved from [dot.ca.gov: http://www.dot.ca.gov/dist2/planning/pdf/sr139tcr.pdf](http://www.dot.ca.gov/dist2/planning/pdf/sr139tcr.pdf)
- California Department of Transportation. (2013, December 19). *Eligible (E) And Officially Designated (OD) Routes*. Retrieved from [CA.gov: http://www.dot.ca.gov/hq/LandArch/scenic/cahisys.htm](http://www.dot.ca.gov/hq/LandArch/scenic/cahisys.htm)
- California Environmental Protection Agency; North Coast Regional Water Quality Control Board. (2011, November 23). Retrieved from [waterboards.ca.gov: http://www.waterboards.ca.gov/northcoast/water_issues/programs/tmdls/lost_river_lower/](http://www.waterboards.ca.gov/northcoast/water_issues/programs/tmdls/lost_river_lower/)
- California Environmental Protection Agency; State Water Resources Control Board. (2013, August 5). *Impaired Water Bodies; 2010 Integrated Report (Clean Water Act Section 303(d) List / 305(b) Report) - Statewide*. Retrieved from [waterboards.ca.gov: http://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2010.shtml?wbid=CAR1059101019990217163525](http://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2010.shtml?wbid=CAR1059101019990217163525)
- California Environmental Protection Agency; State Water Resources Control Board. (2014, September 26). *Stormwater Program; Construction Stormwater Program*. Retrieved from [swrcb.ca.gov: http://www.swrcb.ca.gov/water_issues/programs/stormwater/construction.shtml](http://www.swrcb.ca.gov/water_issues/programs/stormwater/construction.shtml)
- California Geologic Survey. (2008). *Earthquake Shaking Potential for California- 2008*. Retrieved from [conservation.ca.gov: http://www.conservation.ca.gov/cgs/information/publications/ms/Documents/MS48_revised.pdf](http://www.conservation.ca.gov/cgs/information/publications/ms/Documents/MS48_revised.pdf)
- California Geologic Survey; USGS. (2008). *Earthquake Shaking Potential for California*. Retrieved from [conservation.ca.gov: http://www.conservation.ca.gov/cgs/information/publications/ms/documents/ms48_revised.pdf](http://www.conservation.ca.gov/cgs/information/publications/ms/documents/ms48_revised.pdf)
- Centers for Disease Control and Prevention. (2014, February 20). *Hantavirus*. Retrieved from [cdc.gov: http://www.cdc.gov/hantavirus/](http://www.cdc.gov/hantavirus/)
- Environmental Protection Agency. (2004, September). *RCRA In Focus; Construction, Demolition and Renovation; Solid Waste and Emergency Response*. Retrieved from [epa.gov: http://www.epa.gov/wastes/inforesources/pubs/infocus/rif-cd.pdf](http://www.epa.gov/wastes/inforesources/pubs/infocus/rif-cd.pdf)
- Federal Aviation Administration. (2015, March 5). *Tulelake Municipal Airport Tule Lake, CA*. Retrieved from [AirNav.com: http://www.airnav.com/airport/O81](http://www.airnav.com/airport/O81)
- Lowinger, R., & RLA. (2014). Tule Lake Historic Graffiti Assessment Report and Treatment Recommendations.
- Modoc County. (1988). Modoc County General Plan.
- Modoc County. (1988). Modoc County General Plan; Goals, Policies and Action Program. Modoc County.
- Modoc County. (1988, September 19). *Modoc County General Plan; Goals, Policies and Action Program*. Retrieved from [County of Modoc: http://www.co.modoc.ca.us/departments/planning/general-plan](http://www.co.modoc.ca.us/departments/planning/general-plan)
- Modoc County. (1991). Modoc County Zoning Code Title 18.
- National Park Service. (2015). Director's Order 12; Conservation Planning, Environmental Impact Analysis and Decision Making; 2.9 Overview of the NEPA Process — Impacts. Retrieved from [NPS.gov: http://www.nature.nps.gov/protectingrestoring/DO12site/02_Ovrvu/029_impacts.htm](http://www.nature.nps.gov/protectingrestoring/DO12site/02_Ovrvu/029_impacts.htm)

National Park Service; Department of the Interior. (2013). *Five Year Strategic Plan 2013-2017*.
Personius, & USGS. (2012, July 23). *geohazards.usgs.gov*. Retrieved from Earthquake Hazards Program:
http://geohazards.usgs.gov/cfusion/qfault/show_report_AB.cfm?fault_id=843§ion_id=c
Transportation, C. D. (2007). Archeological Survey and Evaluation Report for Property Transfer and
Hazardous Waste Testing. Caltrans.
U.S. Bureau of Reclamation; NPS. (2014). *5 Year Strategic Plan Update*.
U.S. Department of the Interior; BLM. (2013, April 4). *Applegate Lassen Emigrant Trail*. Retrieved from
blm.gov: <http://www.blm.gov/ca/st/en/fo/alturas/lass.html>
U.S. Department of the Interior; National Park Service. (2015). *IX. Summary of the National Historic
Landmarks Criteria for Evaluation*. Retrieved from NPS.gov:
http://www.nps.gov/nr/publications/bulletins/nrb15/nrb15_9.htm
U.S. Department of the Interior; USGS. (2013, February 12). *Volcano Hazards Program Glossary*.
Retrieved from Volcanoes.USGS.gov: <http://volcanoes.usgs.gov/vsc/glossary.html#glnk-66>
U.S. Environmental Protection Agency. (2013, July 30). *Environmental Justice Considerations In The NEPA
Process*. Retrieved from epa.gov: <http://www.epa.gov/Compliance/nepa/nepaej/index.html>
U.S. Fish and Wildlife Service. (2014, July 16). *Endangered Species; Glossary*. Retrieved from FWS.gov:
<http://www.fws.gov/Midwest/endangered/glossary/index.html>
United States Bureau of Reclamation. (2015). *Summary of Related Environmental and Cultural Resources
Laws, Rules, Regulations, and Instructions*. Retrieved from usbr.gov:
<http://www.usbr.gov/nepa/docs/Attachment%204.pdf>
United States Department of Agriculture Forest Service. (2015). *Modoc National Forest; About the Forest*.
Retrieved from USDA.gov: <http://www.fs.usda.gov/main/modoc/about-forest>
United States Department of Agriculture; Natural Resources Conservation Department. (2015). *Web Soil
Survey*. Retrieved from nrcs.usda.gov: <http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>
United States Environmental Protection Agency. (2014, July 15). *water.epa.gov*. Retrieved from
Authorization Status for EPA's Stormwater Construction and Industrial Programs; States, Indian Country
and Territories Where EPA's Construction General Permit (CGP) and Multi-Sector General Permit
(MSGP) Apply: <http://water.epa.gov/polwaste/npdes/stormwater/Authorization-Status-for-EPAs-Stormwater-Construction-and-Industrial-Programs.cfm>
United States National Park Service. (2015). *Summary of Archeological and Historic Preservation Act of
1974*. Retrieved from www.nps.gov: <http://www.nps.gov/Archeology/tools/Laws/ahpa.htm>
USGS. (2015). *earthquake.USGS.gov*. Retrieved from Earthquakes Hazards Program; Search Earthquake
Archives: <http://earthquake.usgs.gov/earthquakes/search/>
USGS. (2009, December 29). *Volcano Hazards Program*. Retrieved from USGS.com:
<http://volcanoes.usgs.gov/images/pglossary/volcano.php>
USGS; Bryant. (2000). *Earthquake Hazards Program Database*. Retrieved from Geohazards.USGS.gov:
<http://earthquakes.usgs.gov/hazards/qfaults>
Wiss; Janney; Elstner Associates Inc. (2011, October 19). Tule Lake Jail Historic Structure Report. 5.
Emeryville, CA, USA.