



Visitor and Administrative Facilities Environmental Assessment



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U.S. Department of the Interior – National Park Service – Minidoka National Historic Site

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How to Comment on this Environmental Assessment

This EA is being made available to the public, federal, state and local agencies on the park's website (www.nps.gov/miin) for a 30-day public comment period. Press releases will be distributed to news media and the park's mailing list. For a list of libraries in Idaho, Alaska, Washington and Oregon where the document will also be available, please check the park's Management section of the website.

Copies of the document may be obtained from PEPC or Minidoka National Historic Site:
Internet: <http://parkplanning.nps.gov/miin> (PEPC Project Numbers 57644 and 57645)

In addition, written comments will be accepted at the above or following locations:
Email: miin_public_comments@nps.gov

Fax: (208) 837-4857

Mail:
Minidoka National Historic Site
P.O. Box 570
Hagerman, Idaho 83332

Phone: (208) 933-4110

Note to Reviewers: Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment – including your personal identifying information – may be made publicly available at any time. Although you can ask the NPS in your comment to withhold your personal identifying information from public review, the NPS cannot guarantee that it will be able to do so.

Responses to substantive comments on the 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).

Note: For more information about specific agency and staff consultation, see Chapter V: Consultation and Coordination, List of Persons and Agencies Consulted / Preparers.

How this Environmental Assessment (EA) is Organized

Table of Contents. This lists the chapters and primary sections and where they may be found within the document.

Chapter I: Purpose and Need. This chapter identifies the purpose and need for the proposed actions and the planning background for the project. Chapter I also highlights the purpose and scope of the EA and the purpose and significance of the park. *Impact Topics* describes the potentially affected resources and laws or policy related to their inclusion in this Environmental Assessment. It also identifies those resources that have been dismissed from further analysis due to no or negligible potential environmental consequences as a result of the proposed plan.

Chapter II: Alternatives. This chapter describes the alternative courses of action that may be taken, including the reasons for dismissing options that do not meet criteria for inclusion. It also identifies and provides analysis related to the selection of the Environmentally Preferable Alternative. The effects of the alternatives are compared in Table 4: *Impact Comparison Chart*. The NPS preferred alternative is Alternative 2 and the environmentally preferable alternative is Alternative 2.

Chapter III: Affected Environment. This chapter describes the existing environment by resource category. Included are resources that may be affected (changed) either beneficially or adversely by implementation of the proposed alternatives.

Chapter IV: Environmental Consequences. Existing conditions in Alternative 1: No Action (Continue Current Management), as described in Chapter III: Affected Environment, constitute the baseline for evaluating the effects or environmental consequences of the proposed actions.

Methodology identifies the means by which impacts to various resources are analyzed.

Environmental Consequences provides a comparison of the beneficial and adverse effects associated with the alternatives including cumulative impacts. A comparison table is provided – *Impact Comparison Chart* (Table 4) – to further assist in discerning the differences in projected impacts among the alternatives.

Chapter V: Consultation and Coordination. This chapter provides additional information about public participation, including internal, public and alternatives scoping as well as consultation with other agencies during preparation of the Environmental Assessment

Chapter VI: References. This section provides bibliographical information for sources cited in this Environmental Assessment.

Chapter I: Purpose and Need

A. Introduction

Minidoka National Historic Site encompasses 388 acres in south central Idaho. Established by presidential proclamation on January 17, 2001 as a national monument and then expanded in 2008 as a national historic site, the park preserves and interprets the historic features and history of the former Minidoka War Relocation Center. The camp held 13,000 Nikkei (Japanese American citizens and legal resident aliens of Japanese ancestry) from Washington, Oregon, California, and Alaska during World War II. The park comprises a small portion of the 34,063-acre historic camp. Peak population at the camp was 9,397 people, which made it Idaho's seventh largest city during World War II (NPS PWR 2006). Vast areas of the original camp have been lost forever—reduced to rubble, or converted to farmland (FFA 2015).

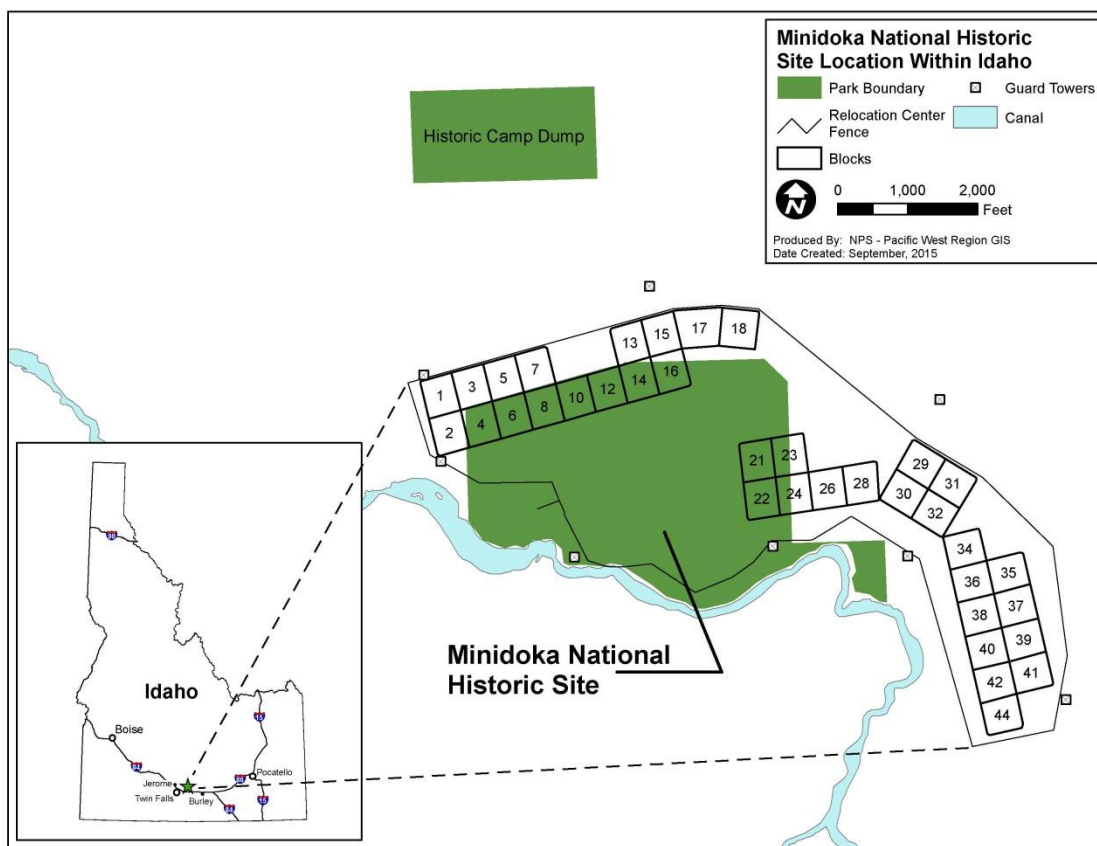


Figure 1: Location Map from Cultural Landscape Inventory (NPS 2007:10). The park, shown in green, has expanded since this was created, including a farm easement.

B. Decision to be Made

If reviewers do not identify significant environmental impacts, this Environmental Assessment (EA) will be used to prepare a Finding of No Significant Impact (FONSI) which will be sent to the National Park Service's Pacific West Regional Director for approval. The regional director will decide whether to rehabilitate the Herrmann House as an administrative facility and Warehouse #5 as the park's visitor contact station as described herein. Upon approval, the selected alternative could then be implemented.

C. Purpose of the Environmental Assessment

This EA has been prepared to satisfy the requirements of the National Environmental Policy Act (NEPA) of 1969 (Public Law 91-190, 42 U.S. C. 4321-4347, as amended), including the Council on Environmental Quality (CEQ) regulations found at 40 CFR 1500 -1508 and other applicable laws, *National Park Service Management Policies: The Guide for Managing the National Park System* (NPS 2006), the NPS NEPA handbook (Director's Order [DO]-12, *Conservation Planning, Environmental Impact Analysis* (2001), and *Decision-making*) and other management directives. This Environmental Assessment facilitates compliance with Section 106 of the National Historic Preservation Act, and Section 7 of the Endangered Species Act, and other applicable laws enacted for the protection of the environment.

D. Park Purpose and Significance

Purpose of Minidoka National Historic Site

The purpose of the Minidoka National Historic Site is to provide opportunities for public education and interpretation of the internment and incarceration of Nikkei (Japanese American citizens and legal resident aliens of Japanese ancestry) during World War II. The national historic site protects and manages resources related to the Minidoka War Relocation Center.

Significance of Minidoka National Historic Site

Civil and Constitutional Rights

- The national historic site is a compelling venue for engaging in a dialogue concerning the violation of civil and constitutional rights, the injustice of forced removal and incarceration, the history of racism and discrimination in the United States, and the fragility of democracy in times of crisis.
- The national historic site offers a unique setting to reflect on the internment and incarceration experience and the relationship of this experience to contemporary and future political and social events.
- The national historic site provides a forum for understanding how incarcerated expressed citizenship and patriotism through individual choices. Choices reflected a range of responses, including serving valiantly in the military and draft resistance. Both choices affected families and communities, as well as the individuals who made them.

People

- Minidoka War Relocation Center dramatically changed the lives of those incarcerated and had a dramatic and lasting impact on the Nikkei community.
- The establishment of the Minidoka War Relocation Center during WWII had a profound effect on the social and economic fabric of neighboring southern Idaho communities.

Place

- The setting and location of Minidoka, with its isolation, openness, and distance from the Pacific Coast, are characteristic of the War Relocation Authority's (WRA) site selection criteria. The camp was a hastily constructed, large-scale temporary facility that became densely populated with over 9,000 people at one time. Due to geologic constraints, the camp was laid-out in a crescent shape, atypical of WRA camps constructed during World War II.
- The national historic site contains unique historic and archeological resources, many of which are listed on the National Register of Historic Places.

World War II

- The Minidoka War Relocation Center represents a significant part of World War II and American history.

E. Project Goals

The following goals for the project were identified in the Project Management Information System (PMIS) funding proposal:

- Provide for onsite visitor contact services, information, and interpretive messages, comfort and safety.
- Provide onsite administrative support facilities.
- Rehabilitate historic fabric and recommend a sensitive, non-destructive adaptive use of the interior of the warehouse building.
- Repair damaged historic fabric where viable.
- Construct an addition to the warehouse (to reestablish the form of the original warehouse) to provide for basic programmed needs (restrooms, janitorial space, mechanical/electrical space, etc.) and other needs that cannot be provided within the existing warehouse space without an adverse effect on the interior.
- Provide safe and clear access roads, parking and pathways from the entrance to the warehouse, and throughout the immediate area, including universal access to all facilities.
- Reduce amount of staff travel time between parks to transport tools and materials, including wear and tear on vehicles and use of fuel/energy.
- Reduce threats to onsite archeological resources from improving onsite presence of NPS.
- Provide necessary and energy efficient mechanical systems.

As a result, the following purpose and need for the project were identified through subsequent planning.

Specific goals for the rehabilitation of Warehouse #5 include:

- Preserve intact character of Historic Warehouse #5;
- Provide for accessibility;
- Stabilize the existing structure;
- Restore weather tightness to exterior envelope;
- Provide a highly functioning flexible interior;
- Provide a model of historic preservation; and
- Achieve net zero energy use (FFA 2015).

F. Purpose and Need

Purpose

Proposed rehabilitation would implement the General Management Plan (GMP) direction and improve visitor understanding of the significance of the incarcerated experience during World War II, the relevance today of the loss of civil liberties, and their role in preservation, protection, and stewardship. Rehabilitation would also address documented human health and safety issues and improve visitor satisfaction.

- Implement GMP recommendations to create a visitor contact station that provides information and shelter for those visiting the park.
- Improve onsite visitor orientation, visitor experience and interpretation, including a better understanding of what comprised the historic landscape, including the complex

issues and history surrounding the incarceration of Japanese-American citizens during World War II.

- Provide onsite restrooms (with year-round access).
- Provide for key administrative functions onsite, such as site security and NPS presence.
- Address documented human health and safety issues, including rehabilitation of the historic structure, modification of extant site facilities, such as warehouse pads, site housekeeping, and shelter.
- Rehabilitate historic landscape features, including the warehouse building proposed to house the visitor contact station.
- Integrate the visitor contact station with historic and current onsite circulation patterns, including the recently developed trail system.
- Improve accessibility for visitors and employees.
- Provide onsite security and fire protection reservoir for remaining and relocated historic structures.
- Improve efficiency of onsite management, including staff, vehicles, and energy use.
- Use former locations of structures to minimize intrusion of new elements in the cultural landscape.

Need

The General Management Plan, which underwent public comment and was approved in 2006, calls for opening the historic 1942 original warehouse as a visitor contact station.

The interiors of historic buildings will be adaptively rehabilitated in the park development zone for visitor contact and orientation as well as education and interpretation. Restroom facilities will be provided to accommodate year-round visitation. The warehouse building will be restored as feasible. The NPS will incorporate the principles of sustainable and universal design into all facilities and operations (NPS 2006: 79).

This is also supported by the park's enabling legislation (NPS 2006: 212-213).

Providing a visitor contact station at Minidoka would rehabilitate and improve preservation of one of the most historically important structures at the site. The extant warehouse is the only one of its kind in War Relocation Centers in the national park system.

Establishing a visitor contact station would enable the National Park Service to have a safe facility within which to provide visitor orientation and education, administrative functions associated with a visitor contact station, and interpretive exhibits.

Administration space for park staff is critically needed at Minidoka. There are currently no buildings that can serve as permanent facilities to safely provide shelter for park staff. As a result, interpretive rangers and maintenance personnel use their vehicles as a type of office when at the site, which necessarily limits the amount and type of work that can be accomplished when onsite.

The Herrmann House and Warehouse #5 are in poor condition and are continuing to deteriorate from lack of use.

Because of the distance from the current Hagerman Fossil Beds/Minidoka combined headquarters and the lack of employee and visitor facilities, onsite NPS presence is limited to occasional special events and interpretive programming, as well as maintenance needs.

There is minimal onsite interpretation. Special interpretive programming includes the annual pilgrimage, summer programming, and by request, guided walking tours. At other times use of the site is generally limited to visitors exploring the recently constructed self-guided trail or wandering within the site. A wide range of wayside exhibits tell the story.

Except for returning former incarcerated, few visitors are able to grasp the significance of Minidoka and the events which occurred here without the orientation, information and interpretation the visitor contact station would provide. The proposed facility would be used to help visitors understand the magnitude of the remainder of the site during the historic period. (The park manages approximately 300 of the original 34,063 acres.)

Portable toilets, which are incompatible with the historic landscape, currently provide the only onsite restrooms.

Existing nonhistoric buildings near Warehouse #5 do not contribute to understanding the historic landscape.

Issues

Among the problems or opportunities likely to be addressed by the proposed plan are the following:

- Less than half of one warehouse building remains at the site. The building was listed in poor condition in the Cultural Landscape Inventory (NPS PWR 2007) and in the category of “must be preserved and maintained.” The warehouse has also been altered by nonhistoric uses, such as by the Bureau of Reclamation use of the site for many years (1946-2008).
- Left unattended in current conditions, the warehouse building is subject to vandalism, wildland fires, and continued degradation. In fact, a wood burning potbelly stove original to the camp was stolen from the structure in 2009.
- No fire protection facilities exist for existing historic or relocated historic structures at the site.
- Minidoka War Relocation Center has an inhospitable climate during much of the year, including high winds, heat, and bitter cold. Because there is no shelter or welcoming visitor facility, the visitor experience at the site is usually limited to a very short stay.
- Accessibility is very limited at the site, with a 1.6 mile-long self-guided trail and accessible waysides near the entrance.
- There are no facilities for the many local and regional education groups that visit the site.
- Aside from onsite portable toilets and trash and recycling containers at the entrance, there are no facilities (no potable water, no emergency point of contact and no shelter).
- Although electricity is currently available at the Herrmann House and Warehouse #5, it has been disconnected and there are no other utilities (mechanical, plumbing, septic or telephones).
- The closest access to emergency services for visitors is the city of Jerome, Idaho, located approximately 21 miles away.
- Safety hazards that have been documented at the site include: isolation, remoteness, potential for Hantavirus, unchecked traffic on Hunt Road, no wayfinding support, and the tendency of visitors to wander through the site. Although a trail circulating through the site was completed in 2009, visitors who wander off trail may encounter a range of hazards, including historic debris from demolition of facilities when the camp was disbanded, and sharp rusted materials.
- The annual pilgrimage requires provision of shelter, water, and other accommodations each year. Because the current age of former incarcerated ranges from 75-90+ years old,

there is an urgency cited in the GMP, to quickly improve visitor experience to benefit pilgrims incarcerated at Minidoka during World War II.

- Without a structural upgrade, the warehouse building will continue to deteriorate, deflect, and eventually face localized and/or partial collapse.
- The existing historic warehouse does not meet current building code requirements for the life/safety of park visitors and staff. It has no formal lateral force resisting system. The exterior wall sheathing consists of a mix of both horizontally and vertically oriented straight wood planks, which has very little lateral capacity. The roof diaphragm and the connections of the diaphragm to the exterior walls are insufficient to resolve lateral loads. The wall connections to the existing foundations were never designed to resist overturning forces from large wind, or seismic events and have been further compromised by dry rot in the sill plate and at the base of the studs. The load bearing studs are deficient per current code to resist a combination of both axial and bending loads. The foundations appear to be satisfactory from a load bearing perspective; however, numerous large cracks that extend all the way through the stem wall have compromised the foundations in numerous locations.
- There is no fire detection or suppression system for facilities located at the site.
- The nearest NPS staff to the site is located 38 miles (1 hour) west at Hagerman Fossil Beds National Monument (where a shared headquarters for the two parks exists).
- Park staff and visitors must rely on cell phones for communication.
- Because there is no secure storage onsite, including no office space, there are risks from exposure, lack of medical supplies for first responders (to pedestrian or vehicle accidents), and the presence of unknown hazardous materials, etc.
- There have been incidents of vandalism to the buildings and littering of the site. Significant historic site features and artifacts have been stolen because of a lack of security and on-site presence.
- Because Minidoka is located in a high desert, a relatively arid area, high winds and very cold weather are common, especially during fall, winter, and spring. Even summer weather can be extreme, with hot, dry conditions.
- A Confined Animal Feeding Operation (CAFO) has been approved in Jerome County, just a few miles from the site. The permit would allow confinement of 800 animal units, approximately 13,000 livestock (heifers). As a result, it is likely that the proposed visitor contact station would also provide respite from the anticipated odors and predominance of flies emanating from the CAFO.

G. Relationship to Laws, Regulations, Executive Orders, Policies, and Park Planning Documents

Laws: National Park Service

National Park Service Organic Act (1916) (16 USC 1)

The Organic Act established the NPS and the purpose of national parks. Unless their enabling legislation states otherwise, the Organic Act applies to all units of the national park system, including Minidoka National Historic Site.

The National Park Service shall promote and regulate the use of the federal areas known as national parks, monuments, and reservations hereinafter specified . . . by such means and measures as conform to the fundamental purpose of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations (NPS Organic Act, 16 USC 1).

National Park Service General Authorities Act (1970 as amended) (Public Laws 91-368, 94-458, and 95-250— also known as “the Redwood Act”) (16 USC 1a et seq.)

This act prohibits the NPS from allowing any activities that would cause derogation of the values and purposes for which the parks have been established (except as directly and specifically provided for by Congress in the enabling legislation for the parks). Therefore, all units are to be managed as national parks, based on their enabling legislation and without regard for their individual titles. Parks also adhere to other applicable federal laws and regulations, such as the Endangered Species Act (ESA), the Clean Water Act (CWA), the NHPA, the Wilderness Act, and the Wild and Scenic Rivers Act. To articulate its responsibilities under these laws and regulations, the NPS has established management policies that apply to all units under its stewardship.

Minidoka Internment National Monument Establishment (Presidential Proclamation 7395, January 17, 2001)

This proclamation established the Minidoka Internment National Monument by transferring 72.75 acres of land from the Bureau of Reclamation to the National Park Service.

Public Law 110-229 (May 2008)

This law expanded and renamed Minidoka Internment National Monument to become Minidoka National Historic Site.

Other Federal Laws

National Environmental Policy Act (Public Law 91-190) (42 USC 4341 et seq.)

NEPA requires the identification, documentation, and public disclosure of the environmental consequences of federal actions. Section 102 of the act requires that “in every recommendation or report on proposals for legislation and other major federal actions significantly affecting the quality of the human environment, there be a detailed statement concerning the environmental impact of a proposed action.” Regulations implementing NEPA are set for by the President’s Council on Environmental Quality (CEQ) (40 CFR Parts 1500–1508). CEQ regulations establish the requirements and process for agencies to fulfill their obligations under the act.

NEPA sets up a procedural requirement for the preparation of environmental assessments. An EA includes public involvement throughout the decision-making process. In an EA, the impacts of the proposed action and the alternatives to the proposed action are clearly presented to enable a clear basis for choice from among the options by the decision-maker and the public. The NPS has adopted specific procedures for analyzing environmental impacts and complying with NEPA (*Director’s Order 12: Conservation Planning, Environmental Impact Analysis, and Decision-making* [NPS 2001]).

Clean Water Act (Public Laws 92-500 and 95-217) (33 USC 1241 et seq.)

Under the Clean Water Act, it is a national policy to restore and maintain the chemical, physical, and biological integrity of the nation’s waters, to enhance the quality of water resources, and to prevent, and control, and abate water pollution. Section 401 of the *Clean Water Act* as well as NPS policy requires analysis of impacts on water quality. *Management Policies* (NPS 2006) provide direction for the preservation, use, and quality of water in national parks.

Clean Air Act (as amended) (Public Law 88-206) (42 USC 7401 et seq.)

The Clean Air Act (CAA) states that park managers have an affirmative responsibility to protect park air quality and air quality-related values (including visibility, plants, animals, soils, water quality, cultural resources, and visitor health) from adverse air pollution impacts. Special visibility-protection provisions of the CAA also apply to class I areas, including new national rules to prevent and remedy regional haze affecting these areas. Under existing visibility-protection regulations, the NPS has identified “integral vistas” that are important to the visitor’s visual

experience in many NPS class I areas, and it is NPS policy to protect these scenic views. Class II areas allow only minimal degradation of air quality. No integral vistas are identified for class II sites. Minidoka is a class II area under the CAA.

Endangered Species Act (Public Law 93-205) (16 USC 1531 et seq.)

The Endangered Species Act (ESA) requires federal agencies, in consultation with the Secretary of the Interior, to use their authorities in the furtherance of the purposes of the act and to carry out programs for the conservation of listed endangered and threatened species (16 USC 1535 Section 7(a)(1)). The ESA also directs federal agencies, in consultation with the Secretary of the Interior, to ensure that any action authorized, funded, or carried out by an agency is not likely to jeopardize the continued existence of any endangered or threatened species or result in the destruction or adverse modification of designated critical habitat (16 USC 1535 Section 7(a)(2)). Consultation with the U.S. Fish and Wildlife Service (USFWS) is required if there is likely to be an effect.

National Historic Preservation Act (1966 as amended) (Public Laws 89-665 and 95-515) (16 USC 470)

The purpose of the NHPA is to preserve, conserve, and encourage the continuation of the diverse traditional prehistoric, historic, ethnic, and folk cultural traditions that underlie and are a living expression of American heritage. The act directs federal agencies to inventory historic properties (section 110) and to take into account the effect of any undertaking (a federally funded or assisted project) on historic properties (section 106). A “historic property” is any district, building, structure, site, or object that is eligible for listing in the National Register of Historic Places (NRHP) because the property is significant at the national, state, or local level in American history, architecture, archeology, engineering, or culture. Requirements for implementing section 106 are found in the Code of Federal Regulations (36 CFR 800).

Section 110 of the National Historic Preservation Act also gives federal agencies responsibility for preserving historic properties in their ownership or control. It calls for them to use such properties, where feasible and compatible with their preservation, in preference to acquiring, constructing, or leasing others.

Archaeological Resources Protection Act of 1979 (Public Law 96-95) (16 USC 470aa)

The ARPA provides a means for additional protection of archeological resources and for prosecuting the collecting of resources on federal lands. Its purpose is to secure, for the present and future benefit of the American people, the protection of archeological resources and sites that are on public lands and Indian lands (16 USC 470aa).

Architectural Barriers Act of 1968 (Public Law 90-480, 82, Stat. 718, 42 U.S.C. Section 4151 et seq.)

The ABA requires that facilities designed, built, altered, or leased with U.S. government funds be accessible to the public. The ABA, similar to the law associated with private development the Americans with Disabilities Act, was one of the first efforts to ensure that certain federally funded buildings and facilities are designed and constructed to be accessible to people with disabilities. Facilities that predate the law generally are not covered, but alterations undertaken after the law must also be accessible.

Executive Orders

The following executive orders must be considered in project planning.

Floodplain Management Executive Order 11988 (1977, 42 CFR 26951, PL 93-234 Section I) (as amended by Executive Order 12148, 1979, 44 FR 43239, 42 USC 4321)

See discussion of this executive order under *G. Impact Topics*.

Protection of Wetlands Executive Order 11990 (1977, 42 FR 26961) (as amended by Executive Order 12608, 1987, 52 FR 34617, 42 USC 4321)

See discussion of this executive order under *G. Impact Topics*.

Invasive Species Executive Order 13112 (1999, 64 FR 6183) (as amended by Executive Order 13286, 2003, 68 FR 10619, 42 USC 4321)

This executive order was crafted “to prevent the introduction of invasive species and provide for their control and to minimize the economic, ecological, and human health impacts that invasive species cause.” It requires federal agencies whose actions may affect invasive species to identify their actions, and to use relevant programs and authorities to

- prevent the introduction of invasive species;
- detect and respond rapidly to and control populations of such species in a cost-effective and environmentally sound manner;
- monitor invasive species populations accurately and reliably;
- provide for restoration of native species and habitat conditions in ecosystems that have been invaded;
- conduct research on invasive species and develop technologies to prevent introduction and provide for environmentally sound control . . . ; and
- promote public education on invasive species and the means to address them (64 FR 6183).

It also states that federal agencies may not authorize, fund, or carry out actions that will cause or promote the introduction and spread of species unless the agency believes that the benefits of such actions clearly outweigh the harm and has taken all feasible and prudent measures to minimize the risk of harm in conjunction with such actions.

Minidoka National Historic Site vegetation is currently comprised primarily of nonnative invasive species.

Facilitation of Cooperative Conservation Executive Order 13352 (2004, 69 FR 52989, 42 USC 4332)

This purpose of this executive order is “to ensure that the Departments of the Interior, Agriculture, Commerce, and Defense and the Environmental Protection Agency implement laws relating to the environment and natural resources in a manner that promotes cooperative conservation, with an emphasis on appropriate inclusion of local participation in federal decision making, in accordance with their respective agency missions, policies, and regulations.” In doing so, federal agencies are directed to “carry out the programs, projects, and activities of the agency that they respectively head that implement laws relating to the environment and natural resources in a manner that: facilitates cooperative conservation; takes appropriate account of and respects the interests of persons with ownership or other legally recognized interests in land and other natural resources; properly accommodates local participation in federal decision-making; and provides that the programs, projects, and activities are consistent with protecting public health and safety.”

Nearby federal land at Minidoka National Historic Site is managed by the Bureau of Reclamation (BOR) and the Bureau of Land Management (BLM).

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations (59 FR 7629, as amended by Executive Order 12948, 60 FR 6381, 42 USC 4321)

See discussion of this executive order under *G. Impact Topics*.

Executive Order 13007: Indian Sacred Sites (61 FR 26771, 42 USC 1996)

See discussion of this executive order under G. *Impact Topics*.

National Park Service Policies

Management Policies (NPS 2006)

Management Policies: The Guide to Managing the National Park System (NPS 2006) governs the way park managers make decisions on a wide range of issues that come before them. Excerpts from several sections applicable to this plan are highlighted below.

Section 9.3.1 Informational and Interpretive Facilities

Informational and interpretive facilities may be provided to assist park visitors in appreciating and enjoying the park and understanding its significance, provided that the facilities can be developed without impairing the park's natural or cultural resources.

Director's Order 12: Conservation Planning, Environmental Impact Analysis, and Decision-making

DO-12 (NPS 2001) identifies the standards to which NPS environmental analysis documents, including categorical exclusions, environmental assessments (EAs), and EISs, must comply. It also contains a list of applicable departmental (Interior) and agency (NPS) categorical exclusions.

Park Planning Documents

Minidoka Internment National Monument General Management Plan (GMP) (NPS 2006)

The following citations from the GMP goals are among those related to the visitor contact station proposal:

- The interiors of historic buildings will be adaptively rehabilitated in the park development zone for visitor contact and orientation as well as education and interpretation. Restroom facilities will be provided to accommodate year-round visitation. The warehouse building will be restored as feasible. The NPS will incorporate the principles of sustainable and universal design into all facilities and operations (p. 74).
- The warehouse will be adaptively rehabilitated as a visitor orientation facility with interpretive and educational media (p. 66).
- The NPS will provide visitor facilities and educational opportunities for year-round visitation (p. 77).
- Adequate parking will be developed to service the visitor contact orientation facility in the adaptively rehabilitated warehouse area (p. 77).
- The NPS will rehabilitate and use historic pathways and develop new interpretive trails to link key resource areas and viewpoints (p. 78).
- Provide facilities to orient visitor (p. 87).
- Provide rest-room facilities to accommodate year-round visitation (p. 88).
- Adaptively rehabilitate the interiors of the buildings in the historic warehouse for visitor orientation, interpretation and education (p. 88).
- Provide adequate parking for visitor interpretive facility (p. 89).

Boundary Expansion (P.L. 110-229) (May 2008)

This legislation expanded the boundary of the site from 72.75 acres to 300 acres by exchanging a Bureau of Reclamation property and allowing the acquisition of the Herrmann and Robison properties.

This is Minidoka: An Archeological Survey of Minidoka Internment National Monument, Idaho (Western Archeological and Conservation Center 2001)

This survey of the area within the original national historic site boundary (72.75 acres) also included brief analysis of some areas outside this area, including the fire station, landfill, sewage treatment plant, and the diversion from the Milner-Gooding Canal. It includes a brief

determination of eligibility for the National Register of Historic Places regarding the additional parts of the then existing historic site boundary (beyond the 6.0 acres originally included in the National Register listing), noting that all, or nearly all of the features associated with the Minidoka War Relocation Center as listed in its appendix (A) would likely be considered eligible.

General recommendations were provided, including 1) clean-up of modern trash, accumulated sediments, and vegetation, and protection from modern intrusions; 2) limited archeological testing to better define and expose critical features; 3) stabilization and reconstruction of significant structures; and 4) long-term protection of associated features outside the historic site boundaries through acquisition, special designation or cooperative agreements with the owners of adjacent land (Burton and Farrell 2001:111).

Minidoka Internment National Monument: Archeology at the Gate: Archeological Investigations at the Entrance of the Minidoka Relocation Center (Western Archeological and Conservation Center 2003)

In support of the then in-process General Management Plan, this survey uncovered and mapped the entrance garden, excavated an area east of the entrance building to determine the location of another building depicted on War Relocation Authority blueprints, and conducted limited testing to locate the foundations of the guard tower at the entrance.

An Archeological Survey of the John Herrmann “Farm-In-A-Day” Property, Jerome County, Idaho (Western Archeological and Conservation Center 2006)

This survey of the 128-acre Herrmann property was completed after acquisition by The Conservation Fund, in preparation for acquisition by the NPS. It includes a brief determination of eligibility for the National Register of Historic Places and finds that the area is likely eligible under three of the four and possibly all four of the criteria of significance (36 CFR, Section 60). The survey also notes that both the fire station and the root cellar are one of two known from the ten war relocation centers, with the other fire station at Tule Lake and the other root cellar at Heart Mountain.

Cultural Landscape Inventory (CLI) (2007)

Warehouse #5: Approximately one-third of an original warehouse remains in the warehouse area; it is located on eastern end of Warehouse #5. . . The warehouse . . . has been used by the American Falls Reservoir Irrigation District #2 for its operations. . . It is a contributing building (NPS PWR 2007:65) (Figure 2).



Figure 2: Warehouse #5 from Cultural Landscape Inventory (Photograph courtesy of Dick Lord, W.A.C.C. 2001) (NPS PWR 2007: 73)

Four other buildings exist in the warehouse area. A house is located on the slab of Warehouse #6. The house is a former WRA apartment that was moved to its current location (NPS PWR 2007:66) (Figure 3).



Figure 3: House on Warehouse Slab #6 (Photograph courtesy of Dick Lord, W.A.C.C. 2001) (NPS PWR 2007: 22)

A duplex apartment building is located on the slab of Warehouse #9. . . The duplex building was originally a WRA staff housing building that was moved from the staff housing area to the

warehouse area. A porch area, siding, and roofing have been added to the building. . . (NPS PWR 2007:66) (Figure 4).



Figure 4: Duplex on Slab of Warehouse #9 (Photograph PWRO-Seattle 2004) (NPS PWR 2007: 73).

The nonhistoric building moved from City of Rocks is located on the slab of Building #3. . . (NPS PWR 2007:66) (Figure 5).



Figure 5: City of Rocks Building on Warehouse Slab #3

The national historic site encompasses only twelve of the original warehouse locations, and of these, ten building slabs and associated artifacts still remain for Warehouses 2, 3, 4, 8, 14, 15, 16, 18, 19, and 20. In addition, the slab of the gas station and filling island also remain.

These building slabs are cracked and overgrown with vegetation. Additional remnant structures include sections and artifacts from the water, sewer, and electrical systems (NPS PWR 2007:66).

The CLI identified the following impacts:

- Both native and non-native vegetation have intruded on all historic building slabs in the warehouse area and at Building 35-Warehouse Office, obscuring these camp features. The roots of the vegetation, particularly larger shrubs and trees, have created and expanded cracks in the concrete foundations, accelerating their deterioration (NPS PWR 2007: 90).
- Over the past 60 years, native and non-native plants and noxious weeds have taken over the site. Non-native species were introduced during the WWII era and as a result of agricultural activities in and around the National Monument since WWII. Of the 12 documented non-native species on the site, 7 were determined to be noxious weeds by the NPS Exotic Plant Management Team. Many of these plants, including cheatgrass (*Bromus tectorum*), displace native vegetation that was present during the period of significance and obscure the vegetated open space areas at the site (NPS PWR 2007: 90).
- Deferred maintenance of the historic buildings and structures . . . has caused the condition of these features to deteriorate. These buildings and structures include the warehouse, two residential units (formerly a WRA staff housing building), and one structure (located at the site of Building 25 in the warehouse area). Neglect and adaptive re-use of these buildings over the past 60 years has contributed to their deterioration (NPS PWR 2007: 90-91)

The CLI identified the following stabilization measures:

- Stabilization of Historic Vegetation: Have an arborist study the historic vegetation and develop a historic vegetation management plan.
- Stabilization of Historic Wood Features: Have an historical architect or architectural conservator study the wood features and develop a preservation plan.
- Vegetation/Invasive Plants: Have a restoration ecologist develop a plan for invasive plant and noxious weed management.
- Removal of Vegetation that is Negatively Impacting Historic Concrete Slabs (approximately 2.5 acres) (NPS PWR 2007: 92).

H. Impact Topics

This section describes the issues developed during the planning process. It also includes the impact topics that will be carried forward in the analysis of the alternatives. Impact topics are the potentially affected resources. Laws or policy related to their inclusion in this EA are also noted. This section also identifies those resources that have been dismissed from further analysis due to negligible or no identified potential environmental consequences.

1. Introduction

NPS resource specialists and planning staff identified issues and concerns that may have an effect on or be affected by actions in the proposed alternatives.

Impact topics have been identified on the basis of the Management Policies (NPS 2006), federal laws, regulations, and orders, and NPS staff knowledge of resources at Minidoka. Additional issues and concerns were identified from internal scoping. Some of the main issues and concerns included the following: air quality, soils, water resources (water quality), vegetation, wildlife, archeological resources, historic structures and cultural landscapes, visitor experience and park operations.

NPS staff consolidated the issues and selected the impact topics described below to facilitate the analysis of environmental consequences. A brief rationale for the selection of each impact topic is given below. In addition, a discussion of impact topics dismissed from further consideration and the rationale for dismissing them is located in the following section.

2. Impact Topics Analyzed

Impacts of each action and alternative have been analyzed for the topics discussed below. These impact topics focus the discussion on comparing the environmental impacts among alternatives on affected resources.

PHYSICAL RESOURCES

Soils: Management Policies (NPS 2006) require the NPS to understand and preserve and to prevent, to the extent possible, the unnatural erosion, physical removal, or contamination of the soil. The action alternative includes ground-disturbing activities that may affect both previously disturbed and undisturbed soils. Therefore, soils impacts are included in this EA.

Water Resources:

Water Quantity: Because of the need to protect structures at the site from fire, there may be changes in the amount of water used and stored at the site. Therefore, this topic has been included for further analysis.

Water Quality: The 1972 Federal Water Pollution Control Act, as amended by the Clean Water Act (33 USC 1251 et seq., PL 92-500 and PL 95-217), is a national policy to restore and maintain the chemical, physical, and biological integrity of the nation's waters, to enhance the quality of water resources, and to prevent, control, and abate water pollution. Management Policies (NPS 2006) provides direction for the preservation, use, and quality of water in national parks. Section 401 of the CWA as well as NPS policy requires analysis of impacts on water quality. Because of the potential impacts from soil movement, including potential erosion during proposed project activities water quality is addressed.

Air Quality: The Clean Air Act of 1963 (42 USC 7401 et seq., PL 88-206) was established to promote the public health and welfare by protecting and enhancing the nation's air quality. The act establishes specific programs that provide special protection for air resources and air quality-related values associated with NPS units. Section 118 of the CAA requires park units to meet all federal, state, and local air quality pollution standards.

Minidoka National Historic Site is a class II area under the CAA (1977). Class II areas allow only moderate increases in certain air pollutants. The Act states that park managers have an affirmative responsibility to protect air quality related values (including visibility, plants, animals, soils, water quality, cultural resources, and visitor health) from adverse air pollution impacts (EPA 2000). Because project actions have the potential for effects on air quality, air quality has been included as an impact topic.

BIOLOGICAL RESOURCES

Vegetation: NEPA requires examination of the impacts on the components of affected ecosystems. Management Policies (NPS 2006) call for protecting the natural abundance and diversity of park native species and communities, including avoiding, minimizing, or mitigating potential impacts from proposed projects. Minimal effects on primarily nonnative vegetation are expected as a result of the implementation of the building rehabilitation and associated site work, however vegetation has been included as an impact topic.

Wildlife: NEPA calls for examination of the impacts on the components of affected ecosystems. NPS policy is to protect the natural abundance and diversity of park native species and

communities, including avoiding, minimizing, or mitigating potential impacts from proposed projects. Many wildlife species may reside in or near the project areas. Therefore, impacts to wildlife have been included as an impact topic.

CULTURAL RESOURCES

Prehistoric and Historic Archeological Resources / Historic Structures / Cultural Landscapes:

Consideration of the impacts to historic properties is required under provisions of section 106 of the NHPA, as amended, and the 2008 NPS programmatic agreement (NPS et al. 2008). It is also required under the Management Policies (NPS 2006). Conformance with the Archeological Resources Protection Act in protecting known or undiscovered archeological resources is necessary. Management Policies (NPS 2006) calls for ongoing inventory and analysis of the significance of archeological resources found within parks. Federal land managing agencies are required to consider the effects proposed actions may have on properties listed in, or eligible for inclusion in, the NRHP (i.e., Historic Properties), and to allow the Advisory Council a reasonable opportunity to comment. Agencies are required to consult with federal, state, local, and tribal government/organizations, identify historic properties, assess adverse effects to historic properties, and negate, minimize, or mitigate adverse effects to historic properties while engaged in any federal or federally assisted undertaking (36 CFR Part 800). Although the project area has been surveyed for archeological resources, there is additional potential to discover presently unidentified archeological resources; therefore this is included as an impact topic.

RECREATIONAL / SOCIAL RESOURCES

Visitor Experience: Providing for the enjoyment of national park resources is one of the foundations of the NPS Organic Act. The Organic Act directs the NPS to promote and regulate the use of national parks to conserve resources and to provide for their enjoyment by existing and future generations. In accordance with this act, Management Policies (NPS 2006) and DO-17 (Tourism) (NPS 1999) identify visitor use patterns and the desired visitor carrying capacity, and allow for appropriate recreational activities within park units. Depending on the selected alternative, a variety of impacts to visitor use may occur; therefore this is included as an impact topic.

Park Operations: Impacts to park operations are often considered in environmental documents to disclose the degree to which proposed actions would change park management strategies and methods and what additional costs (including staffing) are associated with the proposal. Because the alternatives would result in changes to park operations, this has been included as an impact topic.

Socioeconomics: Socioeconomic impact analysis is required, as appropriate, under NEPA and Management Policies (NPS 2006) pertaining to gateway communities. Because the alternatives could have small impacts to socioeconomics, it has been retained as an impact topic.

3. Impact Topics Dismissed From Further Analysis

The topics listed below either would not be affected by, or would be affected only negligibly by, the alternatives evaluated in this EA. Therefore, these topics have been dismissed from further analysis. Negligible effects are localized effects that would not be detectable as compared to existing conditions. Many of these effects would be short term and would occur only as a result of construction activities. The rationale for dismissing these and other impact topics is given below.

PHYSICAL RESOURCES

Land Use: Management Policies (NPS 2006) provides direction for protection of lands and resources within park units, acquisition of nonfederal lands that are within park units, and cooperation with agencies, tribes, and private property owners to provide appropriate protection

measures. Because land use would remain recreational as a result of the implementation of the action alternatives, it has been dismissed from consideration as an impact topic.

Geologic Hazards: Geologic hazards include earthquakes, rock falls, debris flows, and swift mountain streams. Because no changes in geologic hazards would result from the implementation of the alternatives, these have been dismissed as an impact topic.

Water Resources

Wetlands: Executive Order 11990 requires that impacts to wetlands be addressed. Executive Order 11990, Management Policies (NPS 2006), and *Director's Order #77-1: Wetland Protection* (NPS 2002a) direct that wetlands be protected and that wetlands and wetland functions and values be preserved. They further direct that direct or indirect impacts to wetlands be avoided whenever there are practicable alternatives. Because no actions associated with the alternatives would affect wetlands, this has been dismissed as an impact topic.

Floodplains: Executive Order 11988 (Floodplain Management) requires an examination of impacts to floodplains and potential risk involved in placing facilities within floodplains. Management Policies (NPS 2006), DO-2 (Planning Guidelines), and DO-12 (Conservation Planning, Environmental Impact Analysis, and Decision-making) (NPS 2001), and DO-77-2 (Floodplain Management Guideline) (NPS 2003b) provide guidelines for proposals that occur in floodplains. Executive Order 11988 requires that impacts to floodplains be addressed if relevant. Because no actions associated with the alternatives would affect floodplains, this has been dismissed as an impact topic.

BIOLOGICAL RESOURCES

Special-status Wildlife: The federal ESA requires an examination of impacts to all federally listed threatened or endangered species. Management Policies (NPS 2006) call for an analysis of impacts to state-listed threatened or endangered species and federal candidate species. Under the ESA, the NPS is mandated to promote the conservation of all federally listed threatened and endangered species and their critical habitats within the park. NPS policy also requires examination of the impacts on federal candidate species, as well as state-listed threatened, endangered, candidate, rare, declining, and sensitive species.

Based on consultation with the USFWS, four federal species of concern were identified (USFWS 2015) that could occur within the vicinity of the park. Two of the three – the Bliss Rapids snail (*Taylorconcha serpenticola*) and the Snake River physa snail (*Hatia [Physa] natricina*) are listed as endangered but do not occur at the site because there is no naturally-occurring surface water and because irrigation water diverted from the Snake River in the North Side Canal does not flow year-round. The formerly listed Utah valvata snail (*Valvata utahensis*) was delisted.

Greater Sage-grouse: The site is located within the historical range of the greater sage-grouse, a federal candidate species and BLM sensitive species. The USFWS has twice found that listing is not warranted. Concern for this species continues. Many populations have declined dramatically in the last few decades. Greater sage-grouse are dependent on large areas of mature sagebrush and sagebrush-grassland habitats that have a 15 to 25% sagebrush canopy cover and good grass and forb cover (flowering herbaceous plants) (Idaho Department of Fish and Game 1997 in NPS 2005). Because there is very little mature sagebrush habitat at the park, it does not provide suitable habitat for this species. Proposed actions would not affect sagebrush nor would they affect any listed or proposed species. Therefore, special status wildlife (rare, threatened and endangered species) has been dismissed as an impact topic.

Special-status Plants: The ESA requires an evaluation of impacts from federal projects on all federally listed rare, threatened, and endangered plant species. No potential special status plants have been identified in the project area. Therefore, this topic has been dismissed as an impact topic.

Traditional Cultural (Ethnographic) Resources: Management Policies (NPS 2006) and the NPS cultural resource management guideline (DO-28 and handbook) (NPS 1998a) direct parks to consider potential impacts of planned actions on cultural resources, including ethnographic resources. Minidoka and the surrounding area have a history of habitation and resource use by prehistoric and contemporary American Indians. Analysis of impacts to known resources is important under the NHPA and other laws, including the Native American Graves Repatriation Act (NAGPRA), American Indian Religious Freedom Act (AIRFA), and Executive Order 13007: Indian Sacred Sites. The NPS defines American Indian traditional cultural (ethnographic) resources as any “site, structure, object, landscape, or natural resource feature assigned traditional legendary, religious, subsistence, or other significance in the cultural system of a group traditionally associated with it” (NPS 2006). Traditional cultural properties are ethnographic resources listed on or eligible for the NRHP. No ethnographic resources have been identified at Minidoka. Therefore this topic has been dismissed.

American Indian Religious Freedom Act: To comply with AIRFA, federal agencies must consider the effects of their actions on American Indian traditional religious practices. Based on analysis in the APE, there are no known traditional or religious use areas within the proposed project area. In addition, there are no known Indian sacred sites that would require compliance with Executive Order 13007: Indian Sacred Sites (61 FR 26771, 42 USC 1996).

Museum Collections: Management Policies (NPS 2006) and other cultural resources laws identify the need to evaluate effects on NPS collections, if applicable. Requirements for proper management of museum objects are defined in 36 CFR 79. Collections at Minidoka would not be affected by the proposed project, except by the potential addition of material to the collections if any is found.

Lightscapes: Management Policies (NPS 2006) states that “the Service will preserve, to the greatest extent possible, the natural lightscapes of parks, which are natural resources and values that exist in the absence of human-caused light.” The stars, planets, and moon, visible during clear nights influence people and many other species of animals, such as birds, terrestrial predators and prey. Although the proposed actions under the alternatives would change artificial light sources in the environment, they would preserve the ability to see natural features visible on clear nights. Proposals for lighting associated with the visitor contact station facility have been minimized and would be consistent with NPS night sky protection measures. Therefore this has been dismissed as an impact topic.

Soundscapes: Park soundscape resources encompass all the natural sounds that occur in parks, including the physical capacity for transmitting those natural sounds and the interrelationship among natural sounds of different frequencies and volumes in the park (NPS 2006). NPS DO-47 (Sound Preservation and Noise Management) (NPS 2000) defines operational policies that will protect, maintain, or restore the natural soundscape. Natural sounds are part of the park environment and are vital to the functioning of ecosystems and may also be valuable indicators of their health. Soundscape is the total ambient acoustic environment associated with an area. It may be composed of both natural and human-made sounds. In a high noise environment, natural ambient sounds may be masked by other noise sources. Natural quiet is another term for characterizing the expected natural soundscape.

Construction activities associated with the alternatives under consideration, such as excavation, clearing and grading, earth hauling, gravel spreading, and operation of construction equipment and vehicles, would generate the primary sources of noise from the project. These construction noise impacts would be short term, localized, and negligible to minor. Although there is a potential for some impacts to visitors or wildlife, mitigation measures would be used to minimize these impacts. Mitigation measures that would be used include avoiding construction during the breeding and nesting period of threatened and endangered bird species, and the following general construction best management practices (BMPs):

- Construction would be limited to daylight hours.
- Equipment would not be left idling when not in use.
- Mufflers would be used on all equipment.
- Only well-maintained and properly functioning equipment would be used.

Since impacts would be short term, localized, and negligible to minor and mitigation would be used to further reduce or limit impacts, soundscape impacts have been dismissed as an impact topic.

Prime and Unique Farmlands: The Farmland Protection Policy Act was implemented to preserve and protect the dwindling supply of farmland in the nation. In 1980, the CEQ directed that federal agencies assess the effects of their actions on farmlands classified by the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service as prime or unique. The USDA defines these lands as having soils that are best suited for producing food, feed, forage, and fiber or oilseed crops. The alluvial river soils at Minidoka are classified as prime farmland soils, but not unique soils. Use of land for farming and the type of farmland soils are considered in determining prime and unique farmland. The alternatives would not affect the use of land for farming. Therefore, this impact topic was dismissed from further analysis.

Energy Consumption: Implementation of the proposed actions would not result in measureable increases in the overall consumption of electricity, propane, wood, fuel oil, gas, or diesel for park operations and maintenance. Although the proposed modifications have been designed to meet a LEED silver or greater standard as called for by Management Policies (NPS 2006). The NPS will self-certify this level. Nonetheless overall energy efficiency has been integrated into the design and construction to the degree possible. Therefore this topic has been dismissed.

Environmental Justice: Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations (59 FR 7629, as amended by Executive Order 12948, 60 FR 6381, 42 USC 4321), requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing disproportionately high and adverse levels of human health or environmental effects from their programs and policies on minorities and low-income populations and communities. This executive order does not apply to the subject of this document. The actions evaluated in this EA would not have an effect (either beneficial or adverse) on socially or economically disadvantaged populations.

Chapter II: Alternatives

A. Introduction

The alternatives were derived from the direction expressed in the General Management Plan (NPS PWR 2006) as well as from interdisciplinary analysis by the planning team, design consultants (Fletcher Farr Ayotte, Inc., KPFF Engineers, and others) combined with public and former incarcerated comments over time associated with the development of the GMP as well as those made during annual pilgrimages.

Whereas once there were hundreds of structures associated with the 34,000 acre Minidoka War Relocation Center, following closure, most were removed as vast areas of the camp were reduced to rubble and/or converted to farmland. Of the hundreds of structures associated with the camp, only three remain in their original places. Other structures that remained after the camp was closed have collapsed, been demolished, or have been relocated to other parts of Idaho. Associated with many of these are partial or complete concrete pads, foundations, rubble piles and other indications of their presence.

Although rehabilitation actions are planned, the three remaining structures (the warehouse, fire station, and root cellar) are in poor condition (FFA 2015).



Figure 6: Warehouse#5

It is the warehouse that is identified for rehabilitation as a visitor contact station in the GMP (Figure 6). The two buildings, moved to different foundations and a third building (moved to the site and set on blocks with no foundation), are proposed for removal either because the SHPO has agreed they have no historical integrity or historical link to the site now. (One building is a modified barrack, one is a modified administration building and the other has no connection to the camp period at all.)

In 2010, a barrack and a mess hall associated with the camp were moved to the site and placed in Block 22. Although these structures have integrity and significance associated with the historic period, they were not originally part of Block 22. Research is currently being undertaken to determine whether a stenciled “13” on the historic tar paper of the Mess Hall means that it came from Block 13. As shown in Figure 7, Block 22 was one of 36 barracks blocks identified for the camp, although several of these were not constructed. Each of the blocks was approximately 508 x 442 feet (224,536 square feet or just over five acres).

Five other structures were created after the camp closed, but are made from the remnants of camp buildings. One is the Farm-in-a-Day house, currently being renovated for administrative use. The small structure will house two offices. The others are the Robison house and barn and the Herrmann milk barn and storage shed). None of these have historical integrity.

The GMP estimated that 35 percent of park visitors were former incarcerated and their families and others of Japanese ancestry. Visitation is already higher than expected, increasingly yearly, and expected to improve significantly once a visitor contact station is available (FFA 2015). The

GMP anticipates an average visitation of 225 people per day (which is expected to be higher during peak periods) or approximately 80,000 visitors annually.

The following goals were identified for the action alternatives:

- Preserve intact character of Historic Warehouse #5;
- Provide for accessibility;
- Stabilize the existing structure;
- Restore weather tightness to exterior envelope;
- Provide a highly functioning flexible interior;
- Provide a model of historic preservation; and
- Achieve Net Zero Energy Use (FFA 2015).

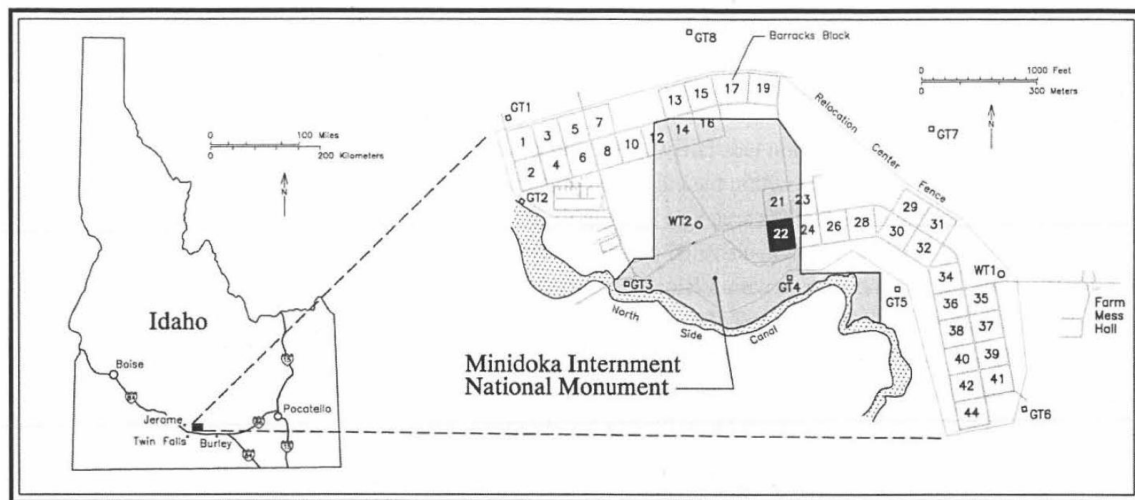


Figure 7: Location of Block 22 from Block 22 Archeological Report (with then park boundary shown) (Burton 2005)

B. Alternative 1: No Action (Continue Current Management)

Under Alternative 1, there would continue to be minimal directional signage leading visitors to Minidoka National Historic Site from Interstate 84 and State Route 25. Although a large entrance sign now welcomes visitors to the site, there are few

directional signs to assist visitors in exploring what remains of the relocation camp (Figure 8).



Figure 8: Park Entrance with Reconstructed Guard Tower (FFA photo)

Upon arriving at the relocation camp, visitors are naturally drawn to stop at the entrance near the newly reconstructed guard tower. After visiting this area, some visitors continue approximately 0.3 mile down Hunt Road from the guard tower to the camp warehouse area. This area currently contains a cluster of three nonhistoric buildings, two historic buildings (Warehouse #5 and the former camp lavatory), numerous concrete pads from former warehouses and the nearby historic root cellar.

Warehouse #5

Approximately one-third (2,300 square feet) of Warehouse #5 (which served as part of an auto or tire repair shop) remains (Figure 9). The building is currently a shell structure with no heat or lighting and is used for storage.

The historic portion of Warehouse #5 is comprised of three of an original seven 16 x 48 feet bays with an added west wall. It was modified, including placement of a small enclosed office in the northeast corner, adding new and filling in some doors and windows, during Bureau of Reclamation use of the area. The piston for a hydraulic lift sleeve or casing is believed to have been added by the BOR and is set into the floor slab, and there are some cast metal jigs attached to one of the center columns that are related to tire repair (FFA 2015).

Outside of the three enclosed bays, the remainder of the concrete pad is exposed. A raised curb indicates the placement of an unknown type of storage tank in the northwest corner. Most interior and some exterior finishes are historic; however the exterior of the building is covered with corrugated metal sheathing, which is not historic. There are currently no serviceable mechanical or plumbing systems present in the building. Electricity is available adjacent to the building. Telephone service is not operational but there is cell phone coverage at the site.

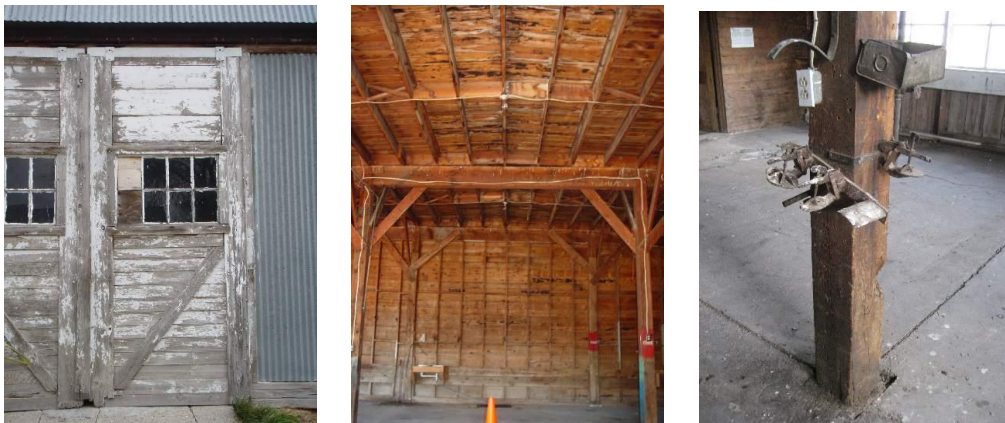


Figure 9: Exterior and Interior Views of Warehouse #5 (from left to right: existing historic sliding doors, single bay view, and historic post with remnant tire repair tools)

Without modification the warehouse would remain in the poor condition identified in the Scope and Cost Validation Report:

The existing historic warehouse does not meet current building code requirements for the life/safety of park visitors and staff. It has no formal lateral force resisting system. The exterior wall sheathing consists of a mix of both horizontally and vertically oriented straight wood planks, which has very little lateral capacity. The roof diaphragm and the connections of the diaphragm to the exterior walls are insufficient to resolve lateral loads. The wall connections to the existing foundations were never designed to resist overturning forces from large wind, or seismic events and have been further

compromised by dry rot in the sill plate and at the base of the studs. The load bearing studs are deficient per current code to resist a combination of both axial and bending loads. The foundations appear to be satisfactory from a load bearing perspective; however, numerous large cracks that extend all the way through the stem wall have compromised the foundations in numerous locations (FFA 2010: 6).



Figure 10: Herrmann House from South (FFA photo)

Without a structural upgrade, the warehouse building will continue to deteriorate, deflect, and eventually face localized and/or partial collapse. Left without intervention, this collapse will likely occur within 20 years. Based on current code, the existing building could not be occupied as a visitor contact station without performing a structural upgrade (FFA 2010c: 7).

Herrmann House

The historic Herrmann House (constructed in 1952) is in poor condition (Figure 10). The 1,042 square foot residence is no longer occupied due to health risks presented by a rodent infestation, mold, failing wastewater piping, plumbing fixtures, and the life safety issues presented by improper wiring, aged equipment, lack of a fire suppression system, smoke detection system, and an operational heating/cooling system (FFA 2014). Under Alternative 1, the building would remain in its existing condition and would continue to be unoccupied. As a result, it is likely that the building would continue to deteriorate.

Visitor Facilities

Restrooms: Under Alternative 1, there would continue to be a portable restroom near the guard tower and in the warehouse area.

Orientation and Interpretation: Visitors arriving at Minidoka National Historic Site have minimal interpretive opportunities. Approximately 23 wayside exhibits are located near the entrance and along a 1.6 mile accessible interpretive trail that winds through the site. There is also an orientation kiosk near the warehouse area. NPS ranger presence is limited to scheduled tours during the year and several hours a week during the summer.

Under Alternative 1, there would continue to be no indoor orientation, and no shelter or indoor exhibits for visitors to the site. NPS contact on site would continue to be limited to special programs, occasional maintenance staff and more regular programming in summer. Most visitors would continue to explore the site unaided by following the trail and by experiencing waysides along the trail, at the entry area (guard tower), at the warehouse area, and at Block 22. Because of

the unexplained nonhistoric structures also present at the site and lack of NPS presence, it is likely that visitors would continue to be confused about the facilities at the site and wonder which are from the historic period. Safety risks (due to extreme weather and no shelter) and theft risk (due to lack of site presence) would remain at current levels.

Additional interpretive information would also continue to be available at the co-managed Hagerman Fossil Beds National Monument (park headquarters), located 38 miles southwest of Minidoka NHS.

Employee Facilities

There would continue to be no place for employees to store personal or work-related gear while at the site except in vehicles used for transport to the site.

Parking and Circulation

Under Alternative 1, there would be no improvements in parking or circulation associated with visiting the relocation camp. Limited parking is available near the guard tower (approximately six spaces, including accessible parking). Approximately 12 undesignated parking spaces are also available in the warehouse area.

Access and circulation through the site would continue to consist of the 1.6 mile interpretive trail which links a range of site features, including wayside exhibits which show historic photos and explain how the relocation camp was used.

As with the guard tower area and the warehouse area, visitors who explore the site on their own would be likely to be attracted to the barrack and mess hall buildings in Block 22, where they would also find a portion of the interpretive trail through the site.

C. Alternative 2: Adaptively Reuse and Rehabilitate Warehouse #5 for Visitor Contact Station (construct partial addition and separate restrooms) and Rehabilitate Herrmann House for Administrative Use (Preferred)

General Description

Under Alternative 2 a new visitor contact station would be constructed using five bays of a former warehouse (three original and two reconstructed). Three existing bays would become the exhibit and education space, minimizing contemporary changes. One bay would be added to serve as the visitor contact station, allowing for contemporary amenities. Two bays would be used as a pass through area. Although there would be no roof, continuous beams and side framing, along with reconstructed pillars in the breezeway (pass-through area) would convey the total mass of the warehouse structure (Figure 13). Another bay would be added to the end to create the comfort station. This would be a separate structure with walls in the same line as the visitor contact station but interrupted by the pass-through area. This would result in two separate structures on the same warehouse pad separated by the unenclosed breezeway (no roof, no walls).

The GMP (NPS 2006) and project management information system (PMIS) #159776 project proposal description call for “re-establishing the form of the original warehouse.” Since there would be two separate buildings on the warehouse pad, this alternative would result in replicating part of the mass and form of the original warehouse structure.



Figure 11: c. 1943 Aerial view of Minidoka War Relocation Center (NPS 2007: 44). (Note warehouse area in center right)

This alternative would also include rehabilitation of the Herrmann House to serve administrative functions, including employee offices. Part of the building (the living room) would also be rehabilitated as a temporary exhibit depicting the Farm-In-A-Day story and used as a temporary visitor contact station until the rehabilitation of Warehouse #5 occurred. Then, the living room would be converted to office and work space.

Warehouse Rehabilitation

Proposed spaces within the visitor contact station in the rehabilitated warehouse would be used as follows:

- 1,536 square feet for changeable interpretive exhibits and education space;
- 356 square feet for bookstore/sales;
- 412 square feet for information counter, staff offices/restroom, a public information desk and media space (including an area where staff would have a secure space for a workroom, storage, phone, money handling, etc.);
- 1,536 square feet for circulation; and
- 768 square feet for public year-round accessible restrooms (including accommodation of men's, women's, and family restrooms) and a mechanical room.

Rehabilitation of the warehouse would include replicating the foundation, retaining and repairing existing support beams, recreating the 16-foot column grid pattern of the historic warehouse within the building and on the concrete pad between the visitor contact station and the restrooms.

Outside garage doors, person-doors on the northeast and southwest corners of the building, and high windows that existed during the time the building was used would be recreated. Truck doors

that formerly existed on either gable end of the building would also be replicated in the rehabilitation through a wide relatively unobstructed path through the structure. This would both retain and replicate the historic focus of the structure.

New facilities, such as the visitor information desk and employee office, would be concentrated in the addition to the restored portion of the warehouse, while the existing three bays would generally be used as an interpretive exhibit. Northeast corner modifications of the building by the Bureau of Reclamation would be removed to allow for a viewing glass at the rear of the building to look out over Block 22 with an interpretive overlay of how the crescent-shaped camp appeared during the historic period. To minimize replacement costs that would be needed because of sandblasting by high winds at the site, the glass could be covered with a polycarbonate film that could be replaced inexpensively.

The building would be finished on the exterior to look like the historic finishes of buildings constructed at the camp. These had black asphalt saturated felt lapped horizontally with 3/8" x 1 1/2" vertical wood battens at 24" on-center over 3/4" x 12" channel lap wood sheathing on wood studs (FFA 2015).

Among the characteristics of the new structure would include:

- Distinguishing the historic fabric finishes from new finishes both indoors and outdoors;
- Retaining as much historic fabric as possible, including exposed framing;
- Creating an exposed interior with clean, simple detailing;
- Restoration of historic openings, including windows and doors;
- Differentiation between old and new (interior and exterior);
- Reestablishing some of the volume and form of the historic warehouse;
- Locating exhibit space in the historic portion of the building;
- Locating the entrance and an audiovisual area in the new portion of the building; and
- Providing year-round accessible restrooms, including a family restroom on the west end.

This alternative would meet the NPS Development Advisory Board recommendation regarding the number of square feet needed in a facility to accommodate intended visitation to the park (an estimated 88,200 annual visitors). This resulted in a need for approximately 4,200 square feet, which includes 1,400 feet of circulation (35 percent for internal and 15 percent for corridors) and an 800-square foot visitor contact station.

Mechanical and Utility Systems

The rehabilitated warehouse would be furnished with new utility systems, including for mechanical (heating and cooling), plumbing, electrical and fire protection. Each of these would be selected to support high energy efficiency and water conservation targets. The building entry would have an airlock vestibule to better retain the heated air in the building. Changes in the energy code between 2009 (when the visitor contact station concept was identified) and present have resulted in this new requirement. The building would also meet or exceed a Leadership in Energy and Environmental Design (LEED) standard of silver or greater as required by Management Policies (NPS 2006). Because the certification is expensive, self-certification analysis would occur.

Water would be provided by an existing well and would be piped to a 30,000 gallon water storage tank, where it would be treated. Park permitted well water usage has been converted from residential to commercial use.

Photovoltaic panels are proposed to be located on the new portion of the visitor contact station. Designing a high performing building envelope could greatly reduce the need for renewable

energy generation. Thermal solar water heating would also be considered for hot water and space heating. Additional power will come from electric utilities. Transmission lines are located adjacent to the visitor contact station. To supplement this, there would be a new underground power line, with a new pole located near the intersection of the access driveway to Hunt Road.

As currently proposed, the heating system would consist of radiant floors combined with a heat pump distribution system. Fans could be located in the nonhistoric new area near the visitor contact station desk/office. Compared to other systems considered, this would reduce lifecycle costs for heating and fuels and would more efficiently heat the interior space with its high ceilings and open frame structure. Under the current proposal, the breezeway area would remain unconditioned space with no heating and no cooling.

The existing structure is historic, therefore the roofline would not be affected. Instead, a small photovoltaic solar array would be attached to the non-historic portion of the roofline to offset energy costs. Above the office, there would likely be a lower ceiling than in the historic portion of the warehouse that could accommodate needed duct work, fans and/or storage needs.

Exterior lighting would be minimal and would be used only for security at entrances and exits when needed. It would be directed inward and downward and shielded where necessary to comply with NPS night sky guidelines.

Data and telecommunications lines will be provided in the rehabilitation. The visitor contact station would have space for an IT switch. Fiber optic lines, including conduit and junction boxes would be installed.

Septic System

A septic tank (approximately 4,000 gallons) and drainfield (approximately 6,900 square feet) would be located in an area southwest or east of the visitor contact station and would accommodate expected use of 1,380 gallons per day for approximately 276 visitors per day. Construction of these would be concurrent with modifications to Warehouse #5. In addition, as required by the State of Idaho, a nearby location would be identified for a second (future) drainfield. Lines for the septic tank and drainfield would extend from the proposed visitor contact and exhibit facility approximately 466 linear feet to the tank and drainfield.

Fire Suppression System

As required by code, a fire sprinkler system would be installed in the visitor contact station. Under the current proposal, an on-demand fire protection system (30,000 gallon storage tank and pump) would be used for the visitor contact station and root cellar and would be housed on a rehabilitated warehouse pad with a fence around it that would mimic the size and mass of another of the warehouses. This reservoir water system would eventually serve future fire protection needs for all other occupied buildings within the park, including the Herrmann Residence, Fire Station, Barrack and Mess Hall. No action is to be taken for protection of the Root Cellar beyond provision of a domestic water line capped near the north end of the Root Cellar (FFA 2015). Occupied public buildings (including the visitor contact station, barracks and mess hall are required by code to have sprinkler systems.

From one to three tanks were considered, however, evaluation found that:

- Initial costs are lowest with one tank, compared to two or three.
- Operations and maintenance needs are lowest with a single tank, pumps, and appurtenances.
- A tank enclosed on one of the warehouse pads by a fence would have the least impact on the cultural landscape.

- An aboveground vs. belowground tank would avoid the risk of needing to excavate additional shallow subsurface rock.

The tank would be located southeast of the Visitor Contact Station on the former site of Warehouse #9. It would be screened by a fence constructed to look similar to the historic warehouse siding. Only equipment requiring weather/thermal protection would be enclosed in an insulated/secured structure. This small structure could also be located on a reinforced warehouse pad inside the fence.

The pumphouse for both the fire protection system and for a well could be in small enclosed buildings also co-located on the same warehouse pad. The most likely warehouse pad that would be used to accommodate these structures would be Warehouse #9, which was used for refrigerated (cold storage) during the historic period. This warehouse pad is located east of the proposed visitor contact station. Underground fire service lines (likely 4-6 inches) would be installed and would extend over approximately 1,736 linear feet and would follow other utilities and roadways where possible. These would be dug approximately three feet deep and two feet wide.

Later work (not part of the current plan) would include providing fire water service and electrical lines to Block 22. These would extend approximately 755 linear feet and would likely follow the existing trail to the site.

Visitor Facilities

Restrooms: As in Alternative 1, there would continue to be a portable restroom near the guard tower. Unlike Alternative 1, there would be a new restroom building (678 square feet) constructed on the warehouse pad, containing men's, women's and family restrooms, and a mechanical/storage room. It would be open to the outside so that it could be used even when the visitor contact station was closed.

Orientation/Information: Compared to Alternative 1, there would be a new visitor contact station facility that would provide information/orientation, interpretation and shelter for visitors to the site. An orientation/interpretive plaza would provide gathering and staging space, orientation information, a memorial, interpretive panels, a 3-dimensional site model and a place for visitors to rest, including shade, seating, and water bottle filling station. Later, tables could be added.

The model of the site and orientation panels would likely be constructed as outdoor exhibits. In addition, there could be a rock garden.

Indoors, there would be interpretive exhibits, a film viewing area and an information desk. As much of the historic interior look of the warehouse as possible would be retained. A digital signboard could provide weather and daily activities information as well as park alerts.

In selected areas throughout the historic portion, building exhibits also would focus on comparing and contrasting former incarcerated's experiences at the site, including from the perspective of first generation Issei (Japanese emigrants), Nikkei (first generation born in the U.S.) and children. The stories would highlight people who experienced the site relating their personal stories.

The physical space within the interior of the building would be designed to accommodate telling the story of the site through exhibits that would include a wide variety of media, oral histories and mementos from the occupation. Although the building can be thermally improved, it cannot be as tightly sealed and environmentally controlled as would be needed for the long-term display of artifacts. As a result, it would likely house passive, conservation grade display cases that would be

able to protect original objects for a short period. Active conservation grade display cases (with temperature and humidity control) would likely also be used (FFA 2015). Small artifacts could be housed in museum quality (protected) cases, while accommodation of larger pieces could be designed into the structure.

Shelter: The proposed visitor contact station would offer shade and shelter from weather conditions.

Employee Facilities

As noted above, approximately 64 square feet would be provided in the visitor contact station for staff offices, restrooms and secure storage. This space would be in the newly constructed addition to the building. Storage could include park brochures, assistive listening devices, first-aid supplies, and sales items.

Herrmann House Rehabilitation

Rehabilitation of the historic Herrmann House to provide administrative functions for Minidoka National Historic Site would consist of upgrading the building interior and exterior to meet public building occupation code requirements by:

- Repairing/replacing foundation and installing foundation and crawl space insulation/vapor barriers.
- Upgrading structure to meet seismic requirements.
- Providing a fire protection system for the building.
- Removing deteriorated exterior sheathing (tongue and groove siding and wood shingles), salvaging pieces in good condition to the extent possible and adding new material where needed with materials similar in size, texture and color.
- Removing flammable interior wallboard (Celotex) in the living room and replacing it with materials similar in characteristics (size and texture).
- Replacing ceiling finishes where needed with materials similar in characteristics.
- Addressing rodent infestation by removing one side of wall covering, cleaning out spaces between the walls and replacing insulation and installing new heating and cooling system ductwork.
- Reconstructing front and back entrances to the house (including providing an accessible ramp).
- Replacing deteriorated window coverings, while retaining original glass and adding double glazed (storm) windows.
- Replacing, repairing and/or adding plumbing, electrical and other utility fixtures and lines.



Figure 12: View of Block 22 from Proposed Visitor Contact Station (FFA photo)

- Replacing light fixtures with historically compatible energy efficient office lighting.
- Refinishing wood flooring in bedrooms and living room and replacing linoleum flooring in kitchen/laundry room.
- Remove and replace roofing with architectural shingles.
- Remove and replace gutters, downspouts and other drainage features (splash block).

Changing the functions of the house would include:

- Remodeling bedrooms to serve as employee offices
- Remodeling the kitchen as an employee break room (retain historic cabinetry, remove under-sink cabinet for accessibility, replace appliances).
- Remodeling the bathroom for accessibility (widen doorway, remove tub, install new toilet, sink, flooring and fixtures)
- Remodeling living room to serve as a temporary visitor contact station and Farm-in-a-Day exhibit and conference room, and upon visitor contact station completion, using it as office and work space.
- Installing a communications, data and security systems.

There would be room for approximately four employee workspaces in the newly remodeled Herrmann House. The facility would be designed to accommodate the smallest number of staff needed to conduct a seven-day a week operation at the relocation camp. To minimize the amount of office space needed, the existing bedroom configuration would be designed to allow staff, interns and volunteers to share flexible spaces. Anticipated staff needs would include current interpretive operations (on-call tours), a ranger and volunteers on weekends during the summer and being open at least one evening (6:00 p.m. – 8:30 p.m.) each week in summer with a roving presence.

Well

The existing well (approximately 12 gallons per minute), storage tank and treatment system would be improved to supply potable water to the site. The well is located approximately 65 feet from the northeast corner of the house.

Mechanical and Utility Systems

Mechanical (heating and cooling) system needs would be met outside the house on a concrete pad.

As noted above, data and telecommunications lines will be provided in the rehabilitation. A server room will be located in the Herrmann House and fiber optic lines (including conduit and junction boxes) would be installed.

Accessibility Improvements

In addition to improving accessibility within the house (as described above), an accessible entrance, including a concrete ramp with handrail and accessible gravel path from the parking area, would be constructed on the north side of the house and would provide access to the house via the former laundry room. Although a front entrance would also be provided, it is likely that this entrance would be the primary entrance (because of the location of parking).

Septic System

A septic tank would be installed and a drainfield would be constructed. The septic tank would be placed adjacent to the west of the house, while the drainfield would be located south of the house between the front of the house and the access road in an area that has been found to meet percolation test requirements and which would not affect historic archeological resources. The 1,000 gallon septic tank would be approximately 4 feet wide x 8 feet long x 6 feet in diameter feet

and the drainfield would comprise another 400 square feet. Both would be designed for the anticipated use of the site (80 gallons per day).

Fire Suppression System

An onsite fire suppression system would be constructed, including a 30,000 gallon tank and piping to feed both the Herrmann House and the historic fire station. It would be located on the Warehouse #9 slab. Although the Herrmann House is not required by code to have a sprinkler system, since it is not a public building, one would be installed to increase protection for it.

Other Site Improvements

Parking/Circulation

Access to the parking area would be off of Hunt Road and would be an unpaved gravel driveway leading to the parking. Exterior circulation for the proposed visitor contact station would be accommodated through a designated vehicle and bus drop-off area, standard, accessible and bus/large vehicle parking, and walkways toward the building that also connect with the existing trail circulation system at the site. The unpaved parking area would accommodate approximately 15 visitor parking spaces, two accessible parking spaces (including one for a van), two staff parking spaces and three bus/large recreational vehicle spaces (Figure 16 [left]). The parking area would be landscaped with non-irrigated areas comprised of native grasses and shrubs.

Accessible and employee parking would also be provided for the Herrmann House. Approximately three spaces would be constructed.

Removal of Nonhistoric Structures

The project would also consist of the removal of the three nonhistoric structures located in the warehouse area. These include the old Bureau of Reclamation residence (1,612 square foot), old BOR duplex residence (2,912 square feet), and City of Rocks Building (1,116 square feet) (see photos in Chapter I: Purpose and Need). The park would seek to have the buildings removed in whole or part through sales of the structures. If the structures could not be sold in whole or part, the park would commence salvage of serviceable portions and would demolish the remainder. The park is in the process of completing the required disposition of government property forms.

D. Alternative 3: Adaptively Reuse and Rehabilitate Warehouse #5 (construct full addition) and Rehabilitate Herrmann House for Administrative Use

Warehouse Rehabilitation

Modifications to the warehouse in Alternative 3 would be the same as Alternative 2 except that in addition to enclosing the restrooms and existing structure bays, the central two bays that comprise the breezeway in Alternative 2 would also be enclosed with a roof and columns that replicate the bay supports. Although no walls would be constructed, removable or transparent glass or similar walls could be added later. Compared to Alternative 2, this alternative would more fully replicate the mass and form of the original warehouse, as called for by the GMP. Enclosing the breezeway would provide protection from the wind and sun, and improve visitor comfort from harsh year-round climatic conditions.

The breezeway would provide an interior, flexible multipurpose space (Figure 15) and the new roof sections enclosing the four nonhistoric bays would be used to support photovoltaic solar panels. The most likely use of this area would be to conduct educational programs so that

participants could be out of the elements (wind and rain). Except during summer, however, it is likely that participants would need an additional source of warmth.

Because of the roof over the breezeway, this 5,535 square foot building alternative would exceed the NPS Development Advisory Board recommendation for 4,200 square feet of visitor contact station space to meet a targeted visitor population of 100,000 or fewer annual visitors by approximately 1,335 square feet.

Herrmann House Rehabilitation

Rehabilitation of the Herrmann House would be the same as in Alternative 2.

Other Site Modifications

Parking and Circulation

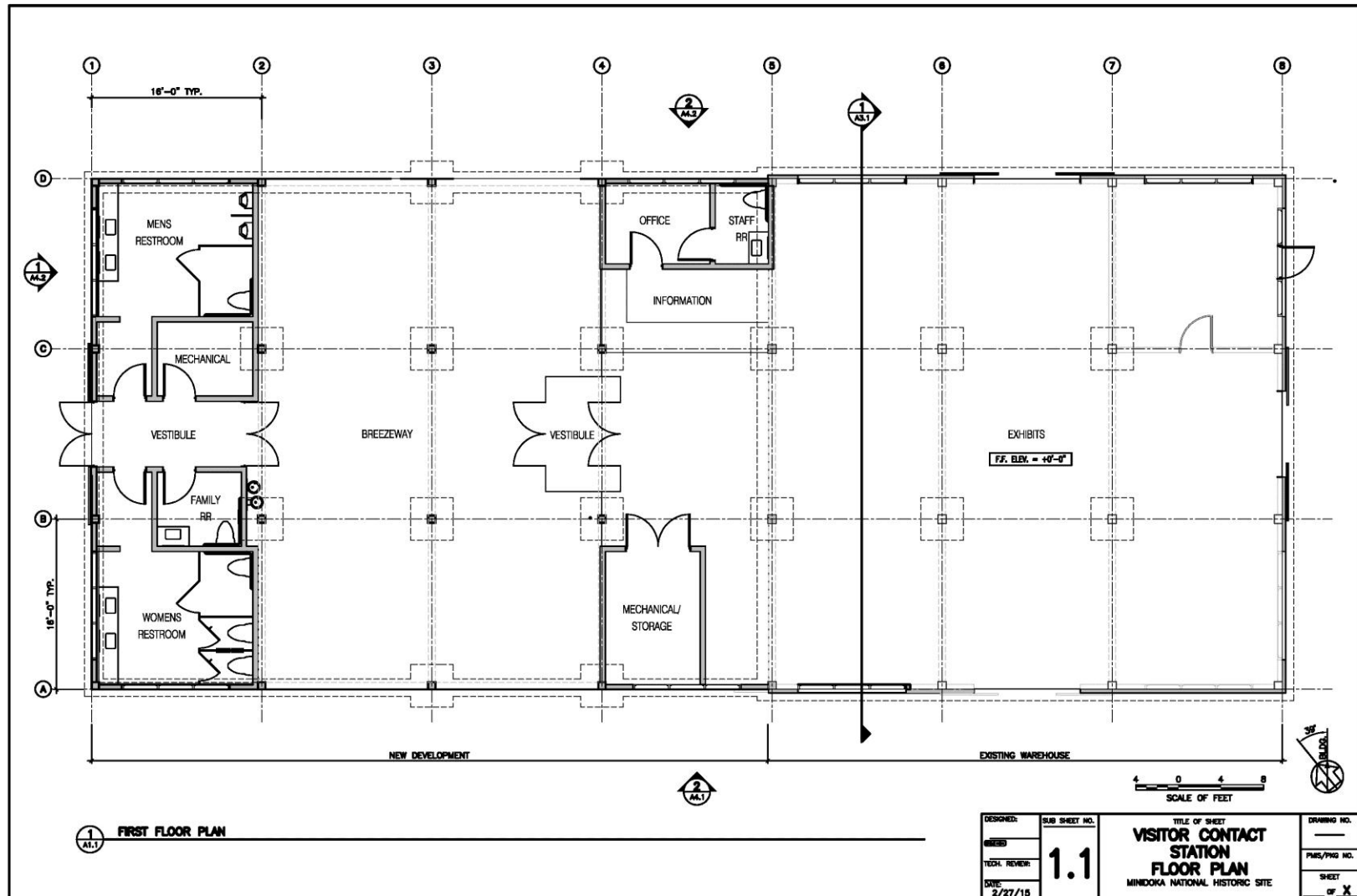
Parking associated with the Herrmann House would be the same as in Alternative 2.

For the proposed visitor contact station, instead of using the current circulation pattern of entering the site via the existing alignment of Hunt Road and traveling directly to the warehouse area, the entrance road called for in the GMP would be constructed.

This road would begin near the Japanese garden across Hunt Road from the reconstructed guard tower and would continue through the site on the former (historic) alignment of Hunt Road. Although this historic alignment of Hunt Road currently exists, it has not been used as a public roadway for many years. As a result, new road base and surfacing would need to be added. The road would also add traffic adjacent to the newly constructed trail before veering off near the Herrmann House/Fire Station and then ascending the hill up to the warehouse (new visitor contact station).

The one-way road would be approximately 1,800 feet (0.34 mile) long and 25 feet wide and would pass through the site by conforming to existing roadways used during the historic period. It would begin near the historic entrance, at the intersection with Hunt Road and S1400E, and it would pass through a former administration area, before veering toward the site of the former water tower, (Herrmann House), and fire station and then toward the Warehouse Area. One-foot shoulders would be constructed of crushed rock. It would require approximately 45,000 square feet (1.03 acres) of asphalt concrete pavement over a crushed rock base, including pre-work to level and grade the area.

The new road would not only offer motor vehicle access to the site but would also provide a route for bicycles to tour the site.



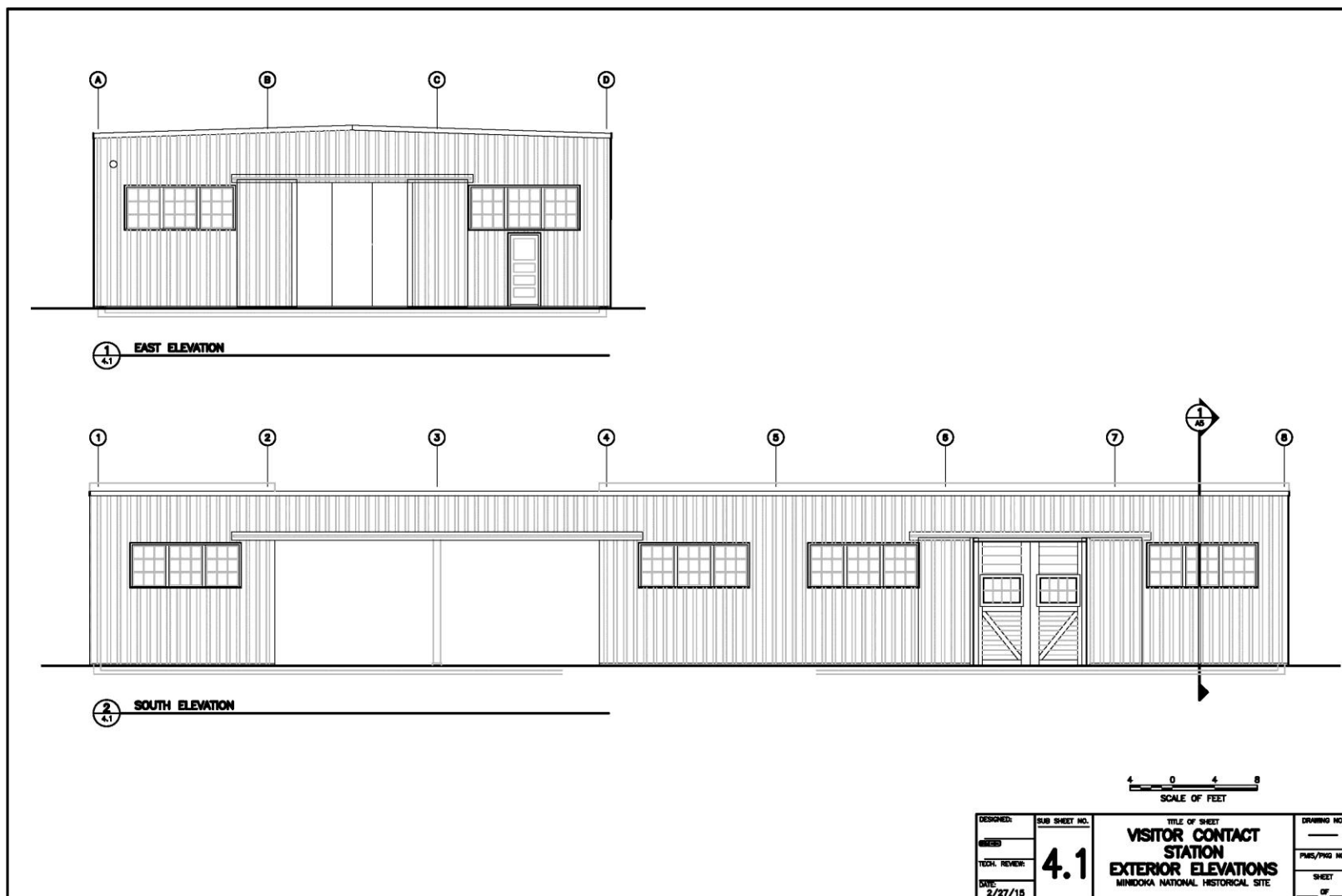


Figure 14: Proposed Visitor Contact Station from South (Alternative 2)

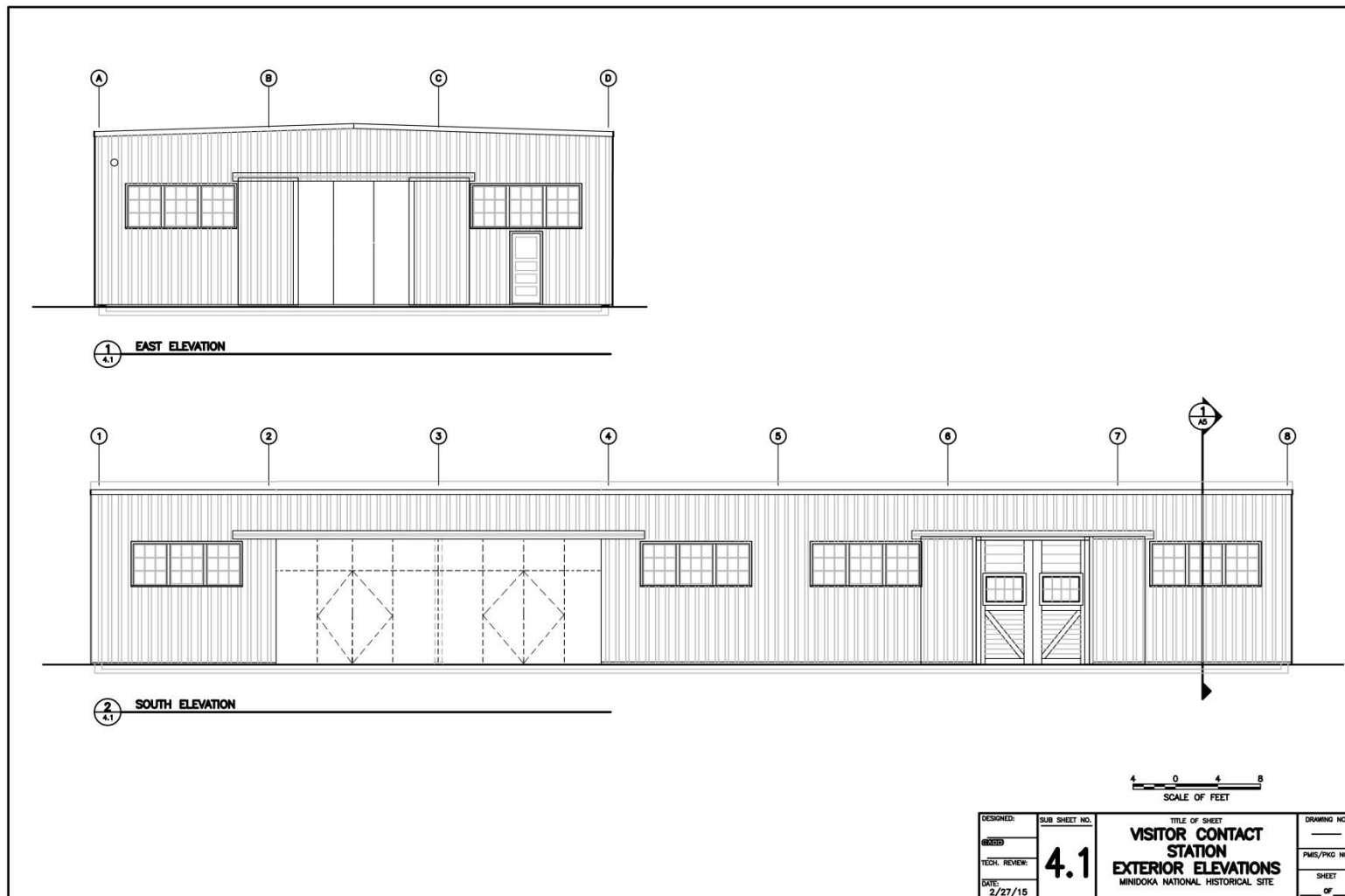


Figure 15: Alternative 3 Warehouse #5 Rehabilitation (includes covered breezeway; dashed lines showing doorway)



PREFERRED ALTERNATIVE



Minidoka National Historical Site

17 Nov 2014

A-149

FFA
Architecture
+ Interiors

Figure 16: Alternative 2 and 3 Parking Options

Interpretive Trail Modifications: The newly constructed trail requires rerouting between the Herrmann House and Warehouse #5 because, instead of constructing the trail near the former gas station (which would have required fill placement), the trail is now within the one-way road corridor. The new trail was installed by the park to meet the ABAAS Federal accessibility standards. Crushed gravel trail material requires yearly compaction to maintain accessible surface.

Because the road would be reused in this alternative, that portion of the trail in the roadway would need to be moved if the road was reused. Therefore a small portion (approximately 792 feet or 0.15 mile) of the trail would be reconstructed as originally planned east of the roadway, where a small bridge or fill area would also be needed to allow the trail to pass over uneven terrain.

Hunt Road Modifications: The park would also work with Jerome County to provide traffic calming along Hunt Road. This could include speed reduction and rumble strips and/or safe pedestrian crossings (two locations). In addition, the park would work with the Jerome Highway District to develop the intersection of Hunt Road and County Road 1450E to improve access to Block 22.

Visitor Contact Station Parking: Provision of parking near the new visitor contact station would be similar to Alternative 2, however, in this alternative, it would be configured differently to accommodate the entrance road modifications (Figure 16 [right]). Although the parking would be configured differently, it would include the same number and type of parking spaces described in Alternative 2 (15 visitor parking spaces, two accessible parking spaces, two staff parking spaces and three bus/large recreational vehicle spaces).

Removal of Nonhistoric Structures

Removal of nonhistoric structures would be the same as in Alternative 2.

E. Alternatives and Actions Considered But Dismissed

Under the National Environmental Policy Act (NEPA) alternatives may be eliminated from detailed study based on the following reasons [40 CFR 1504.14 (a)]:

- *Technical or economic infeasibility;*
- *Inability to meet project objectives or resolve need for the project;*
- *Duplication of other less environmentally damaging alternatives;*
- *Conflicts with an up-to-date valid plan, statement of purpose and significance, or other policy; and therefore, would require a major change in that plan or policy to implement; and*
- *Environmental impacts too great.*

The following alternatives or variations were considered during the design phase of the project, but because they met one of the above criteria, they were rejected.

- Establish a Visitor Center in the Herrmann House or Fire Station.

Various alternatives were considered through the GMP public process however no other alternatives were identified as acceptable (NPS PWR 2006: 8, 215). Based on the GMP there were no advantages to constructing an offsite visitor center since visitors would continue on to the relocation site and would continue to be exposed to unsafe conditions and deterioration of historic structures. The Hagerman Fossil Beds National Monument visitor center is currently inadequate even for that site, containing approximately half of the needed space.

- Use only Existing Section of Warehouse for New Visitor Contact Station

This alternative was considered but dismissed because adding restrooms and a small office to the existing structure would adversely affect the historic integrity of the warehouse.

- Construct New Visitor Contact Station

This alternative was considered but dismissed because maintaining the historic structure through adaptive reuse would result in beneficial effects that would have fewer impacts than both constructing a new facility and maintaining the historic structure.

- Demolish Remaining Warehouse Section and Construct a New Visitor Contact Station on the Same Site

This alternative was dismissed because it would result in an adverse effect on this historic structure, necessitating a Memorandum of Understanding with the Idaho State Historic Preservation Office.

- Construct 180,000 gallon Above- or Below-ground Fire Water Tank

One large tank would require much more disturbance to pipe water to each of the structures that would be protected (Herrmann House, warehouse, Block 22 barracks and mess hall, root cellar, and fire station). It would also require a much larger tank that would be more difficult to conceal in the Minidoka landscape (to avoid adverse effects). Although tanks can be buried, much of the area undeveloped by the camp is underlain by volcanic rock, including outcrops and is unsuitable for excavation without extensive blasting.

- Use Other Types of Structural Systems, Heating Systems, Roof Coverings, and Siding

During the design phase of the project, various other alternatives were considered for the above components of the visitor contact station. These were considered and dismissed for various reasons, including impacts to historic structure, energy efficiency, effectiveness, and cost.

F. Environmentally Preferable Alternative

In accordance with Director's Order-12, *Conservation Planning, Environmental Impact Analysis, and Decision-making* (2001) preferable alternative" in all environmental documents, including Environmental Assessments. The environmentally preferable alternative is determined by applying the criteria suggested in the National Environmental Policy Act (NEPA) of 1969, which is guided by the CEQ. The CEQ (46 FR 18026 - 46 FR 18038) provides direction that the "environmentally preferable alternative is the alternative that would promote the national environmental policy as expressed in NEPA's Section 101," including:

1. Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
2. Assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
3. Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
4. Preserve important historic, cultural and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
5. Achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and
6. Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources (NEPA Section 101(b)).

Section 101(b) Analysis

Generally, these criteria mean the environmentally preferred alternative is the alternative that causes the least damage to the biological and physical environment and that best protects, preserves, and enhances historic, cultural, and natural resources (46 FR 18026 – 46 FR 18038).

1. *Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations.*

Although Alternative 1 would not improve the aesthetic, natural or cultural environment of the park, it would continue to result in the long-term protection of the site where Japanese Americans were incarcerated in Idaho. Unlike Alternative 1, Alternatives 2 and 3 would have long-term beneficial effects on the natural and cultural environment of the park and would improve visitor understanding of its purpose for future generations. Alternatives 2 and 3 would best meet this criterion.

2. *Assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings.*

Without rehabilitation of the Herrmann House and Warehouse #5, including removal of rodent infestation in the Herrmann House and stabilization of Warehouse #5, Alternative 1 would continue to have some unhealthful components and the future potential for safety problems to continue if Warehouse #5 became more unstable or collapse occurred. There would also be no shelter for employees or visitors provided in Alternative 1. The lack of shelter could continue to result in potential unsafe conditions for both employees and visitors using the site. In contrast, Alternatives 2 and 3 would alleviate all known safety issues and health risks associated with the Herrmann House and Warehouse #5 and would also provide shelter for visitors using the site. Because Alternative 2 would not provide a fully rehabilitated structure, resulting in some potential for continued exposure of visitors to inclement weather because of the breezeway, Alternative 3 would best meet this criterion.

3. *Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences.*

As articulated above in criterion 2, Alternatives 2 and 3 would alleviate known health and safety risks associated with two historic structures in the park. Additional risks not mentioned above that would be minimized include the risk of loss from fire, which would be addressed by placement of a fire water storage tank in the former location of Warehouse #9 and alarm systems in both structures. Alternative 1 would not confer any of these benefits and would not meet this criterion.

4. *Preserve important historic, cultural and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice.*

Alternatives 2 and 3 would best meet this criterion because of the rehabilitation of two historic buildings and the compatible modification of a historic structure (Warehouse #9 slab) to mimic the building that once occupied it. Although parking would be constructed in the vicinity of Warehouse #5, it would not affect the slab where the building once stood. Instead, former circulation routes between and around the buildings would be compatibly restored and used to enhance visitor use of the site. Retaining a large portion of the original fabric in Warehouse #5 and the Herrmann House would also occur in Alternatives 2 and 3. Although Alternative 1 would continue to follow actions derived from the GMP and would be intended to preserve historic, cultural and natural aspects of the site, without immediate action, both historic buildings could continue to deteriorate. As a result Alternative 1 would not meet this criterion.

5. *Achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities. [Considered with #6 below.]*

6. *Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.*

Because proposed modifications in Alternatives 2 and 3 have been designed to retain historic fabric and have been designed to minimize resource use by using green building materials and supplies to the degree possible, they are moderate in scope. In addition, as required by NPS Management Policies (NPS 2006), they would meet Leadership in Energy and Design (LEED) silver or better design standards. Therefore proposed modifications, although they would not be LEED certified would be intended to result in rehabilitation that achieves a balance between resource use and visitor accommodation that would not otherwise be present. In contrast, Alternative 1 would not result in rehabilitation and visitors would continue to have a less expansive experience at the site, therefore Alternative 1 would not meet these criteria.

Environmentally Preferable Alternative

Because Alternatives 2 and 3 would meet all six criteria and Alternative 1 does not meet four of the six criteria, either Alternative 2 or 3 could be designated environmentally preferable. Because, however, Alternative 3 would use more resources in both the rehabilitation of Warehouse #5 and to reconstruct the historic alignment of Hunt Road to meet standards for a public use one-way road into the site, Alternative 2 is environmentally preferable.

Chapter III: Affected Environment

1. Introduction

Location and Setting

Minidoka National Historic Site is located in Jerome County on the Snake River Plain, in south-central Idaho. It is situated between three municipalities in Idaho – 17 miles northeast of Twin Falls, 21 miles east of Jerome, and 6 miles northwest of Eden. Of the original 33,000-acre Minidoka WRA Center, only 388 acres are currently part of the park. Jerome County is on the north side of the Snake River and is surrounded by Cassia County and Minidoka County to the east, Twin Falls County to the south, Gooding County to the west, and Lincoln County to the north. The majority of the county has prominent basalt outcrops, but is a moderately flat landscape, with gentle slopes toward the south and the Snake River Canyon.

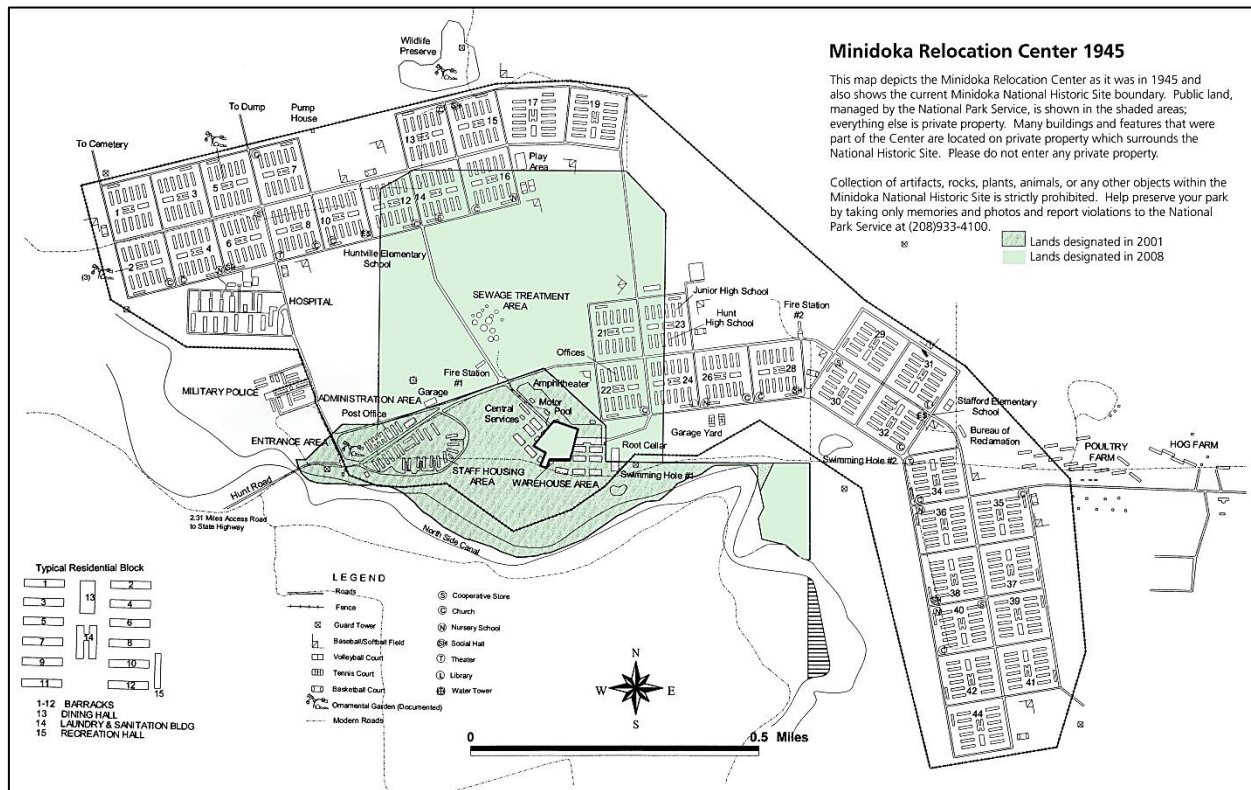


Figure 17: Minidoka War Relocation Center (1945)

Traveling to the site along highways and county roads, the setting is characterized by rolling hills of sagebrush, rural and irrigated farm fields, and a labyrinth of irrigation canals and ditches. A railroad line traverses Jerome County from east to west, and distant views of the Albion Mountains to the south can be seen on clear days. Today, the majority of the historic 33,000-acre camp is covered with fields of alfalfa, corn, barley, rye, and potatoes. There are intermittent farmhouses, outbuildings, and cattle pastures surrounded by trees and agricultural fields. Farmsteads average approximately 100-200 acres in size. Nearby farmers still use the camp's original irrigation canals, some of the wells and roads, and many of the original barracks and

outbuildings moved from the site to nearby locations have been modified to support modern farming operations.

When the camp was created, acres of land were scraped bare of native vegetation and used to construct the more than 600 structures that formerly were spread out through the site. The buildings included barracks, mess halls, schools, and warehouses. The camp was established, in part, to expand farming in this area of Idaho. To this day, the area is a rural farming community, and is reminiscent of the historic landscape, which included crops established by the camp incarcerated. In the early 1940s and 1950s, there were land lotteries to ensure farming remained in the area. These lotteries were also the mechanism used by the BOR to dispose of lands used in the camp. To mimic the historic farmed landscape, part of the park is being farmed under a special use permit and the NPS is focused on creating a competitive lease to continue the farming.

Climate

The park has a moderately harsh climate, with extreme winter and summer temperatures (Table 1).

Table 1: Climate Data for Twin Falls, Idaho

| | Jan | Feb | Mar | Apr | May | June | July | Aug | Sept | Oct | Nov | Dec |
|-------------|------|------|------|------|------|------|------|------|------|------|-----|------|
| Avg. High | 37 | 43 | 52 | 61 | 70 | 79 | 88 | 87 | 77 | 65 | 48 | 38 |
| Avg. Low | 20 | 23 | 29 | 35 | 43 | 51 | 56 | 54 | 45 | 35 | 27 | 20 |
| Avg. Precip | 1.06 | 0.75 | 1.02 | 0.83 | 1.02 | 0.79 | 0.24 | 0.31 | 0.43 | 0.75 | 1.1 | 1.06 |
| | | | | | | | | | | | | |

<http://www.usclimatedata.com/climate/twin-falls/idaho/united-states/usid0263>

The Pacific Ocean is generally the source of moisture for precipitation in Idaho. Occasionally, moisture-laden air comes from the south (the Gulf of Mexico and Caribbean). Average precipitation varies considerably due to topographic variation in the state. South central Idaho has a summer dry, winter wet climate, with frequent winter snowfall and summer thunderstorms. Although much of the Upper Snake River Plain, including the park, receives less than ten inches of precipitation annually, areas elsewhere in the state may receive 40-60 inches. Twin Falls precipitation averages 9.36 inches annually. The Snake River Plain is typical of high desert extreme weather patterns. Extreme weather is common in the area.

2. Geology and Soils

Geology

Minidoka NHS is located on the Snake River Plain in an area dominated geologically by basaltic lava flows, called the Snake River Basalts. This area is characterized by nearly horizontal sheets of basalt laid down in the Snake River drainage to form a plain. Lava flows range from less than 100 feet thick to several thousand feet thick. The basalts are primarily from two periods: the older flows are of the Miocene and Pliocene epoch (2 to 25 million years old); the younger lavas are Pliocene (less than 10 million years old) through recent times. The Snake River Basalts are about 60 miles wide and essentially flat; however, the eastern portions are much higher in elevation. The surface is a youthful lava plateau with a thin wind-blown and stream deposited soil layer covering it. In the vicinity of Minidoka, the most prominent surface features of this volcanism are squeezed-up lava ridges (USFS 1994 in NPS 2006: 179).

Soils

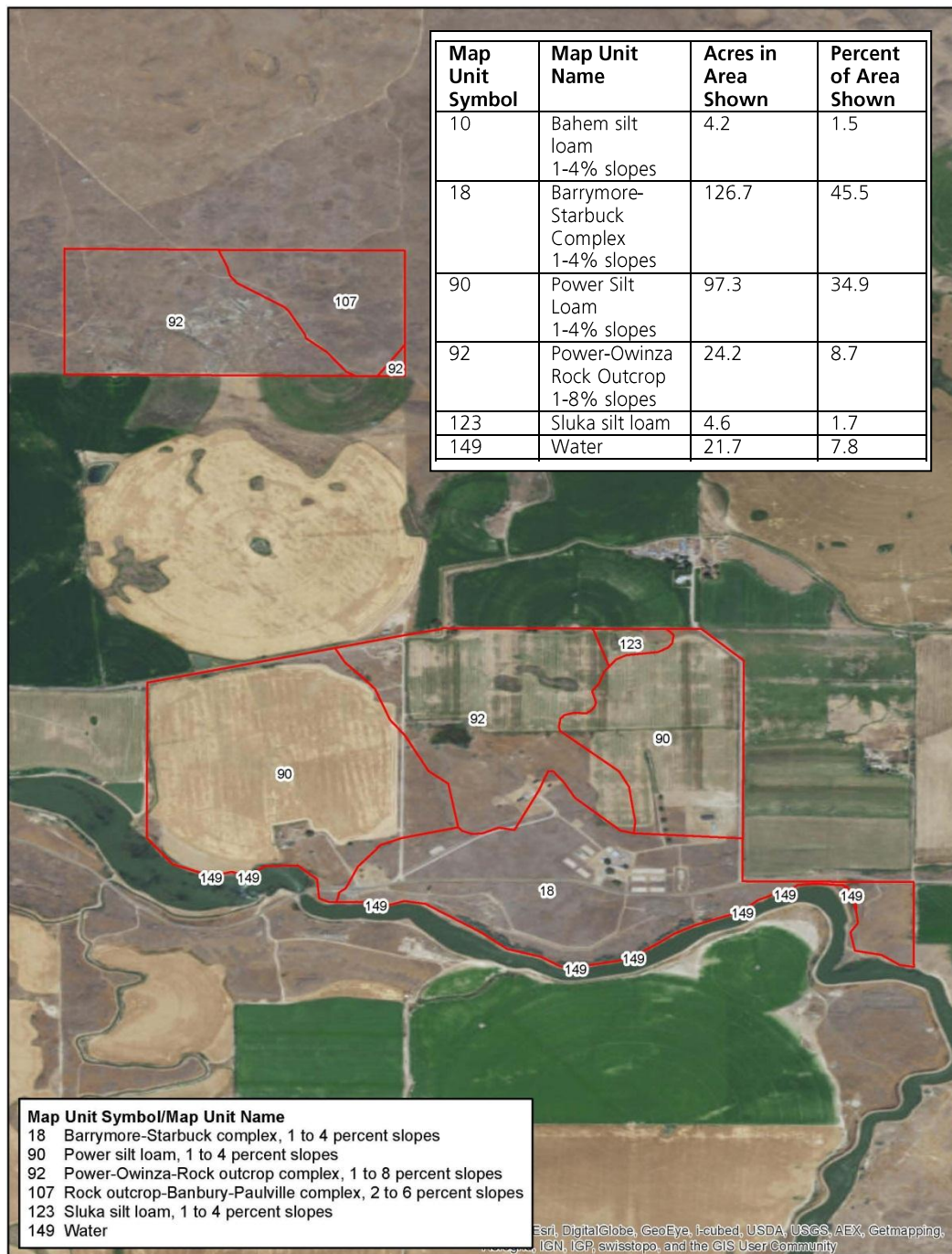


Figure 18: Generalized Soils Map of Minidoka NHS

Soils within Jerome County have been mapped and classified by the Natural Resources Conservation Service (NRCS) (1998). As were shown in this survey, the vast majority of Minidoka is composed of the Barrymore–Starbuck soils complex on slopes of 1 to 4 percent.

Source: <http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>

The project area is located within the Barrymore-Starbuck complex mapping unit shown in Figure 18. The Barrymore-Starbuck complex is noted for slopes of from 1 to 4 percent. The typical soil profile is:

- A horizon – 0-5 inches: silt loam;
- Bw horizon – 5 to 18 inches: silt loam;
- R horizon – 18-28 inches: bedrock.

The depth to bedrock is generally 12 to 20 inches. There is no documentation of flooding (NRCS 2015). The Barrymore-Starbuck complex soil type has a somewhat limited rating for recreational trail and pathway development, meaning that the soil has features that are moderately favorable for this use and that limitations can be overcome or minimized by special planning, design, or installation. Fair performance and moderate maintenance can be expected (NRCS 2015).

The NRCS soil rating for septic tank absorption fields in this mapping unit is “very limited,” with a numeric rating of 1.00, which means that there are difficult impacts to overcome (in this case, it is likely the depth to bedrock). Stones and boulders, ice, and bedrock or a cemented pan are likely to interfere with installation. And, in fact, during surveys to locate the septic tank for the Herrmann House rehabilitation, it was difficult to find a site not affected by surficial bedrock outcrops.

3. Water Resources

Precipitation: As noted in the introduction, the area has a high desert climate, generally receiving less than 10 inches of precipitation annually. Areas surrounding the park (the Jerome region) receive an average of 10.8 inches of precipitation each year, with 4.9 inches falling between the months of November and February. The average high and low temperatures during these months range from 49-19 degrees respectively.

Hydrology: Due to the high desert environment, available and usable water in the form of streams and lakes was nearly absent preceding the development of canals in the area. Rainwater quickly seeped into the ground and filtered through a surface soil layer of decomposed igneous material and a thick vesicular porous basalt layer to the water table. Underground water made its way to major river corridors, such as the Snake River, and flowed out of underground springs along the river’s cliffs (NPS 2007).

There is no naturally occurring surface water within the park. Water for the former Bureau of Reclamation (BOR) maintenance and employee housing area formerly used by the American Falls Reservoir District No. 2 staff was supplied by an on-site domestic well. In addition to domestic use, this water was used to irrigate the lawn and trees on a portion of the parcel. Wastewater was disposed of in a septic tank/drainfield. Another well is located near the Herrmann House and was used by both the Herrmann homestead as well as during the use of the site for the Minidoka War Relocation Center.

Recently the well pump, piping and storage tank for the Herrmann House well were replaced and the well is now fully operable. A fire hydrant near the well was also replaced. Although intended for use for the proposed visitor contact station, the well closest to Warehouse #5 has not yet been improved. Because it previously performed well, it is likely that it will adequately meet the needs of the proposed visitor contact station.

In summer 2014, just south of the Hunt Road and the Idaho Highway 25 intersection (approximately two miles west of the park), a flash flood damaged a portion of Highway 25 and caused its closure for several weeks (Geniac pers. comm. 2015). Extreme precipitation events, including those causing flash flooding, have become more frequent in recent years and are generally common in south central Idaho.

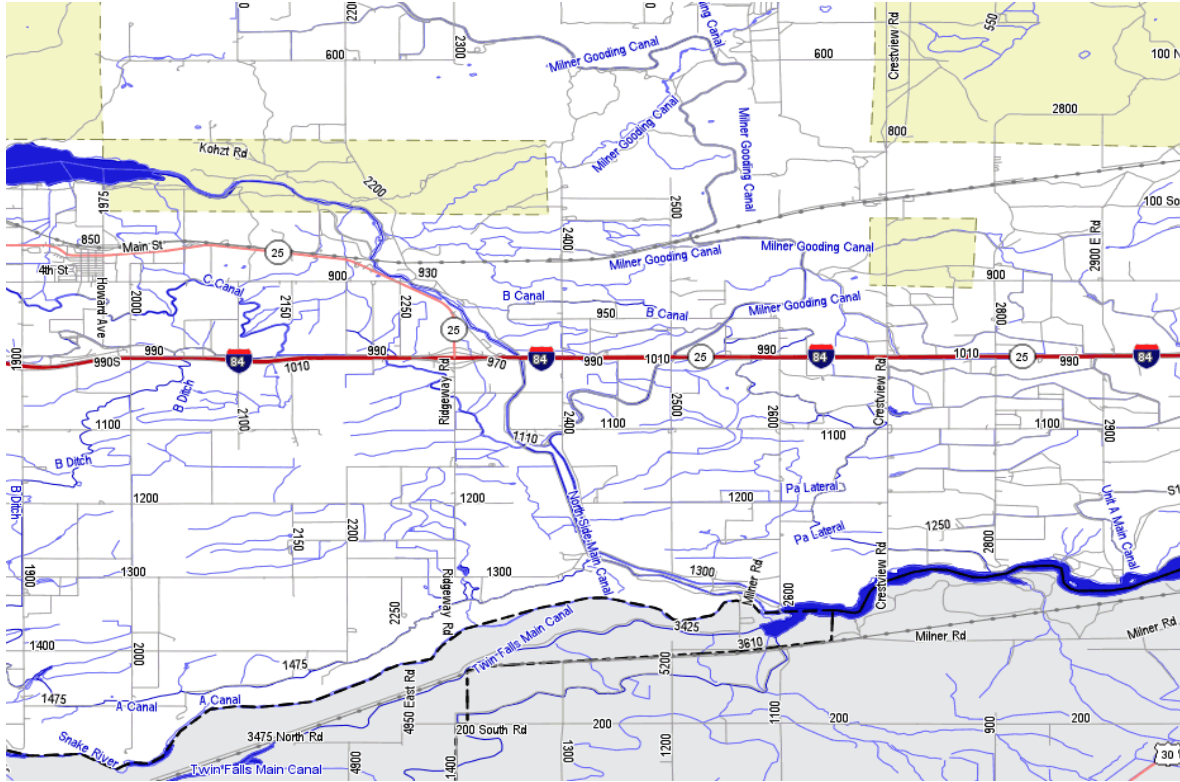


Figure 19: Jerome County Canals (partial)

Note: North Side Main Canal and Milner Gooding Canal in center of map image.

<http://bridgehunter.com/id/jerome/big-map/>

Water Supply: The North Side Main Canal, the primary surface water feature in the area, is immediately adjacent to the southern boundary of the park. During the growing season, typically from April through October, water is diverted from the Snake River and flows through the canal to provide irrigation to approximately 170,000 acres in the vicinity. From late October through the winter, the canal is generally dry, but may contain a few shallow pools of water lingering after the irrigation season or that appear briefly following heavy precipitation. The canal is at a lower elevation than the camp, which obtained its irrigation water from the Milner Gooding Canal. This is the canal that continues to supply irrigation water to the farmers, west, north and east of the park and it is used in conjunction with groundwater by the farming in and near the park.

Groundwater and Groundwater Quality: Groundwater management areas were established in the vicinity in the mid-1980s (1984 for Twin Falls, Idaho) following concern over potential effects of groundwater pumping https://www.idwr.idaho.gov/WaterInformation/Publications/ofr/ofr-gwma_rpt.pdf. Data for groundwater in the vicinity of the park show a decline in levels. USGS data regarding groundwater near Jerome, Idaho show a fluctuation of approximately 41 feet between the lowest and highest measurements measured over the past 24-26 years <http://groundwaterwatch.usgs.gov/AWLSites.asp?S=423159113570302&ncd>. According to a 2001

state staff report that primarily addressed western Jerome County, groundwater in Jerome County is threatened by drought, rapid population growth, and expanded agricultural development (Gillerman and Schiappa 2001). According to the report abstract, “the recent increase in the number of dairy farms and their confined animal feeding operations (CAFOs) are threatening the unconfined basalt aquifer. This study of the geology of western Jerome County constitutes part of an analysis of groundwater vulnerability to contamination from septic tanks, dairy feedlots, surface farming and other sources.” Groundwater recharge in northern Twin Falls County takes place through precipitation in higher elevation areas, through surface water, and canal leakage (Neeley 2001).

Water Quality: Because there is no naturally occurring surface water at the site and there has been little use of the site since the BOR service area stopped being used in 2008, there are no known ongoing effects on surface water quality. It is likely that water seasonally flowing past the site in the North Side Canal continues to be affected by area agricultural and ranching operations, including from particulates during plowing operations and from agricultural runoff, which likely includes contamination from pesticide use.



Figure 20: Minidoka Farm Landscape (FFA Photo)

4. Air Quality

Minidoka is designated as a class II area under the Clean Air Act. Although the Clean Air Act gives the highest level of air quality protection to Class I areas, it provides many opportunities for the National Park Service to participate in the development of pollution control programs to preserve, protect, and enhance the air quality of all units of the national park system (NPS 2006: 4.7.1).

According to NPS Management Policies:

External programs needed to remedy existing and prevent future impacts on park resources and values from human caused air pollution will be aggressively pursued by NPS participation in the development of federal, state, and local air pollution control plans and regulations (NPS 2006: 4.7.1).

Near the park, local sources of air pollutants include automobile exhaust, wind-blown dust, emissions generated by agricultural activities, smoke from seasonal agricultural burning and periodic wildland fires, as well as scattered point sources principally associated with the food processing industry. County zoning also allows for development of industrial agriculture, such as feedlots, on private lands.

5. Vegetation and Fire

Vegetation

The Snake River Plain is a high desert that naturally supports sagebrush steppe vegetation: a mosaic of dominant shrubs interspersed with open areas occupied by perennial grasses. Where water exists, there are riparian areas. Above the Snake River Plain or at higher elevations, there are forests dominated by trees, such as limber pine (*Pinus flexilis*) and Douglas-fir (*Pseudotsuga menziesii*).

The predominant potential natural vegetation at the site includes big sagebrush (*Artemisia tridentata*) and wheatgrass (*Agropyron* spp.) (Kuchler 1964). Few large blocks of this natural vegetation remain at the site. These species have largely been replaced by agriculture; depleted by livestock overgrazing altered by an increase in fire frequency and intensity; and invaded by nonnative, annual grasses and forbs both prior to and following the removal of relocation camp facilities.

The present-day vegetation of the area is comprised predominantly of nonnative invasive plants, with a mosaic of remnant native plants, scattered trees and shrubs planted by incarcerated during World War II. A preliminary vegetation inventory was completed associated with the trail and fence construction project (NPS MIIN 2011).

Remnant sagebrush steppe, remnant landscape plantings and widespread nonnative invasive plant communities are evident at the site. Overall, the site is highly disturbed. Virtually every part of it has been altered by human activity at least once and often repeatedly in the past. Among the most significant disturbance to the natural vegetation of the site was the development and operation of Minidoka War Relocation Center in the early to mid-1940s. Other disturbance occurred associated with use of the site as a homestead and farm.

Native vegetation remaining on the site is comprised of sagebrush, including both basin big sagebrush (*Artemisia tridentata* ssp. *tridentata*) and Wyoming big sagebrush (*Artemisia tridentata* ssp. *wyomingensis*), which can be found scattered throughout the site, especially in the historic open space south of Hunt Road. Rubber and green rabbitbrush (*Chrysothamnus nauseosus* and *C. viscidiflorus*), native shrubs that are quick to occupy disturbed sites, can also be found. Grasses and forbs characteristic of the native sagebrush steppe vegetation are also still found on the site in varying degrees. These include bluebunch wheatgrass, Thurber needlegrass, Sandberg bluegrass, bottlebrush squirreltail, Indian ricegrass, phlox, arrowleaf balsamroot, penstemon and others.

A few live trees and shrubs planted during the historic period of the Minidoka War Relocation Center are still found on the site. Scattered historic black locust (*Robinia pseudoacacia*) trees exist in the entrance area, administration area, and staff housing area. In addition, a few ornamental

shrubs, including garden lilac and a rosebush, still survive in the administration and staff housing area.

Most of the vegetation is not native to the Snake River Plain. Cheatgrass (*Bromus tectorum*), crested wheatgrass (*Agropyron crestatum*), and exotic annual grasses that displace native vegetation regionally are well established throughout the site. In the cursory vegetation inventory of the site associated with the proposed trail (Appendix 2), 17 native and 32 nonnative species were identified. Four of these species are classified as noxious weeds by the state of Idaho.

Various other plants not native to the site are also found. Russian olive (*Elaeagnus angustifolia*) trees have colonized relatively moist habitats along portions of the North Side Canal. Other water-loving plant species typically found in riparian zones are also now established along portions of the canal. These include native willows (*Salix* spp.) and sedges (*Carex* spp.), among others. Shade and ornamental vegetation, including black cottonwood (*Populus balsamifera* L. ssp. *trichocarpa*) and Siberian elm (*Ulmus pumila*) trees and other grasses and forbs are also present.

Virtually all the land surrounding the project area is in some form of agricultural production, much of it irrigated. Crops, the primary vegetation in these areas, include alfalfa, corn, barley, rye, potatoes, sugar beets, wheat, and beans.

Russian knapweed and yellow starthistle represent the greatest noxious weed threats to the historic site. The park is also threatened by musk and Canada thistles and Russian olive trees. Surrounding areas are infested by purple loosestrife, saltcedar, spotted and diffuse knapweeds, rush skeletonweed, and leafy spurge; these species are constantly threatening to invade the project area. Since the construction of the trail, many of the nonnative trees and shrubs have been removed. The area is treated each year by the Upper Columbia Basin exotic plant management team, a specialized work crew that removes nonnative invasive plant species.

Fire

In 2015 the Secretary of the Interior issued a press release that committed the department to collaborate with other federal, state, county, tribal, and non-governmental organizations on a “Comprehensive Strategy to Protect and Restore Sagebrush Lands Threatened by Rangeland Fire (USDOI 2015).” This extensive conservation effort was in response to the potential for federal listing of the Greater Sage-grouse under the Endangered Species Act (which has now been decided against). The urgency of this massive effort was described by Secretary Jewell:

“Targeted action is urgently needed to conserve habitat for the greater sage-grouse and other wildlife in the Great Basin, as well as to maintain ranching and recreation economies that depend on sagebrush landscapes,” said Secretary Jewell. “The Secretarial Order further demonstrates our strong commitment to work with our federal, state, tribal and community partners to reduce the likelihood and severity of rangeland fire, stem the spread of invasive species, and restore the health and resilience of sagebrush ecosystems (USDOI 2015).”

The State of Idaho contains approximately 14 percent of greater sage-grouse habitat, consisting of 8.1 million acres of which 74 percent is federal land (USFWS 2015). Although the park contains some sagebrush, invasive nonnative species, such as cheatgrass, comprise much of the historic site. These nonnative invasive species are a threat to remaining park vegetative communities because of their presence and their ability to quickly amplify and spread wildfires, since forbs and grasses tend to dry out more quickly than native shrubs. There is, however, no indication of sage-grouse presence in the park (see Wildlife section) because there is little mature sagebrush habitat that has not been affected by past uses of the site.

6. Wildlife

Wildlife

An unknown number of birds, mammals, reptiles, and amphibians are found at the site. No systematic inventory of wildlife species has been completed. Most information comes from information about the habitat and wildlife in the region and from casual on-site observations.

Mammals: Mule deer (*Odocoileus hemionus*) are the largest and most easily recognized large mammal found in and around the site. Occasional pronghorn (*Antilocarpa americana*) may also be seen. In addition, there is evidence of coyotes (*Canis latrans*), yellow-bellied marmots (*Marmota flaviventris*), cottontail (*Sylvilagus sp.*) and jack rabbits (*Lepus sp.*), striped skunks (*Mephitis mephitis*), and a variety of small mammals, including wood rats (*Neotoma spp.*), deer mice (*Peromyscus spp.*) and voles (*Microtus spp.*).

Birds: Along the North Side Canal many waterfowl have been observed annually, including white pelicans, mallards, gadwalls, cinnamon teal and numerous species of gulls have been observed. Because water only flows through the canal during a portion of the year, typically April through October, the canal is of limited value in sustaining populations of waterfowl. The canal contains marginal native (willow) and nonnative riparian habitat (mostly Russian olive trees currently strung with a nonnative vine – white bryony).

Among the terrestrial birds that have been observed at the site include red-tailed and Swainson's hawks, northern harriers, ravens, turkey vultures, Bullock's orioles, killdeer, cowbirds, brewer's blackbirds, cowbirds, barn and great-horned owls and the nonnative ring-necked pheasant (hunted in the vicinity of the park). Of these, orioles, great horned owls and killdeer have also been observed nesting.

Reptiles and Amphibians: Although not a naturally occurring habitat, the North Side Canal does provide surface water, which may harbor populations of amphibians, however these have not been inventoried. Reptiles observed at the site include gopher snakes (*Pituophis catenifer*) and on occasion, diamondback rattlesnakes (*Crotalus atrox*).

Fish: Due to the lack of surface water, there are no fish in the park. Oral histories of former Minidoka incarceratedees indicate that the North Side Canal did contain fish during the historic period. At that time, Snake River water was diverted through the canal year-round. Modern operation of the canal limits diversion to the growing season and requires the use of fish screens and other methods to prevent the entrainment of fish into the canal. For these reasons, fish are now rarely, if ever, present in the North Side Canal.

Invertebrates: The canals are outside of the park's boundary, however, remains of crayfish and other invertebrates have been seen in the park, as they have been left by feasting birds.

Based on the sensitive species list for Jerome County (<https://fishandgame.idaho.gov/ifwis/portal/page/species-status-lists>), only killdeer are known from the project area. There are no federally listed species that occur at the site or in Jerome County. Jerome County, however, includes the Greater Sage Grouse and the North American wolverine, both of which are federal candidate species. Neither of these species is documented from the project area, although poor quality habitat for the greater sage grouse is found in the surrounding area.

7. Archeological Resources

Note: The Affected Environment section for Historic Structures / Cultural Landscapes is presented immediately following this section, with the environmental consequences for both sections immediately following that section. Analysis of archeological resources, historic structures and cultural landscapes has been combined because historic archeological resources currently comprise the only archeological resources that have been found at the site to date.

Archeological resources at Minidoka National Historic Site are comprised primarily of features and artifacts associated with the period of camp operation from 1942 to 1945 and associated with the homesteading and Farm-In-A-Day period from 1946 through the 1950s.

Minidoka War Relocation Center

Although objects that postdate the camp's closure were noted during an archeology survey of the historic site in 1999-2001, no artifacts predating the camp were identified. This could be due to the ground disturbance that was caused during the construction of the camp although the probability of a significant prehistoric site in the immediate area is low (Burton and Farrell 2001). The most likely prehistoric artifacts to be encountered at the site and in the surrounding area are isolated stone tools or stone flakes or debris from making stone tools (Burton and Farrell 2001). Nevertheless, the State of Idaho has located a roadside exhibit on State Route 25 that indicates the presence of a nearby prehistoric site that has yielded important archeological information about past use of the area. This sign is located at the intersection of Highway 25 and Hunt Road.

Prior to its transfer to the NPS, the site had not been surveyed for archeological resources. A reconnaissance visit was completed by Jeff Burton in 1999 followed by the first systematic surface survey and documentation field work in May 2001. The systematic survey's stated goals were to conduct an intensive survey aimed at documenting the remaining features from the historic period as well as any other archeological objects identified, photographing the site and features, and completing a site assessment. A less intensive survey was also slated for the area surrounding the site so that associated and contributing features to the camp could also be recorded to provide a more comprehensive assessment. Archival materials, including maps and photographs, were used to guide the archeological work and to assess the integrity of the historic features. The methods that were employed during the archeological survey of the historic site met the Idaho State Standards for an intensive survey level since the spacing was 15 or less meters and the terrain was open with good ground visibility but there has been limited subsurface testing. Consequently, it is possible that archeological resources are yet to be found.

Minidoka was known to have a unique layout that deviated from the strict plans of the nine other War Relocation Centers because of the uneven terrain (including the fact that much of the site is closely underlain by bedrock) and because of the serpentine alignment of the North Side Canal. Rather than a grid alignment, the housing areas were separated into two groups forming a crescent shape to the north and east of the North Side Canal.

More than 200 features were recorded during the 2001 survey, and over half those features date to the historic period, while the other features and most of the artifacts postdate the camp's operation (Burton and Farrell 2001). The 2001 survey was divided into camp use zones and included the entrance, north administration area, central administration and staff housing area, south staff housing area, warehouse and motor pool, swimming hole, and perimeter security fence. This survey was supplemented by testing at the entrance area in 2002.

Additional specific archeological information has been collected about the Entrance area, North Administration Area, Central Administration and Staff Housing Area, South Staff Housing Area,

Warehouse and Motor Pool, Swimming Hole, Perimeter Fence and about features outside the boundary. As noted elsewhere, after World War II, much of the camp area was altered.

Farm-In-A-Day

In July 2006, an archeological survey of the 128-acre Herrmann homestead was conducted. Ninety-six features (including five buildings) and 12 isolated artifacts were recorded (Burton 2006:v). While most of the features were from the Herrmann Farm, some were also from the Minidoka War Relocation Center, including the Fire Station, Root Cellar and other infrastructure. The farm also contains portions of two relocated barracks buildings, the pier blocks that supported water tower #2, and the sewage treatment plant. In the center of the War Relocation Center, the property included all or parts of seven of the original 35 residential blocks (12, 14, 16, 21-all, 22-all, 23, 24) (Burton and Farrell 2006:3), some of which were not developed or were developed with other than buildings, such as Center Field.

The Herrmann homestead is important because of its association with the historic Farm-In-A-Day event and because it illustrates how the Minidoka War Relocation Center land was disposed of and the buildings reused following the release of the incarcerated (Burton 2006). The Herrmann homestead contains a residence, barn, outbuildings, ditches, fences and an irrigation system (Burton and Farrell 2006:3). Approximately 95 acres of the 128-acre property were developed as fields.

The Farm-In-A-Day program implemented in Idaho was one of the few in the U.S. and is an example of Idaho homesteading history. It was promoted in 1952 and sponsored by the North Side Soil Conservation District. Not quite a year after the last incarcerated left the war relocation center (October 23, 1945), on February 4, 1946, areas suitable for grazing in the area were transferred to the Bureau of Land Management (BLM) and areas suitable for irrigation and farmland were transferred to the Bureau of Reclamation (BOR) for division and distribution as small family farms. Using a lottery, 43 of these farms, averaging 90 acres each, were allotted in 1947 and 46 were allotted in 1949 and 1950 mostly to World War II veterans (Burton 2006). Each lottery winner also received barrack buildings and miscellaneous furniture, appliances, and housewares from the camp. In fact, the first group of farmers lived in Block 30 of the war relocation center until they could move their barracks to their own farms (Burton et al. 2003).

The Herrmann homestead was unique because it was also used by the Soil Conservation Service (SCS) to demonstrate different forms of machinery and the newest conservation practices, including the latest examples of land leveling, land curves, soil classification, and crop-specific irrigation and row spacing (Roberts-Wright 1994:219 in Burton and Farrell 2006:9). A special event, held in April 1952 coined the term “Farm-In-A-Day” and used 1,500 volunteers and 25 local committees to construct the 950-square-foot house and the farm. Construction materials, including for parts of the house, the farm and the landscaping, even farm animals were donated (Burton and Farrell 2006:11). The event drew over 11,000 people (North Side News April 17 and April 18, 1952 in Burton 2006:11). Volunteers plowed, leveled and planted fields, built fences, dug a well and ditches, moved buildings on site and built the Herrmann house, all in a day (Harpers Ferry Center 2008). The farm is located on a small hill overlooking much of the war relocation center. Unlike the war relocation center, laid out to follow the natural terrain and the curves of the North Side Canal, the farm was laid out using the four cardinal directions.

The farm also contains its former irrigation system infrastructure, including a pond, pump, pipelines and nearly four miles of unlined ditches (Burton and Farrell 2006:23).

Potential for Other Archeological Resources

In addition to the known historical archeological resources, it is possible that a variety of prehistoric and historic archeological resources will be encountered within the national historic site in the future, although none were identified in three archeological surveys (Burton and Farrell 2001, Burton et al. 2003, and Burton and Farrell 2006) of the area.

Nearby Archeological Sites

The NPS has an obligation to document and evaluate all such resources even if they are not directly related to the events of World War II and the history of the camp. Based on review of previously documented archeological sites on file at the Western Repository for the Archaeological Survey of Idaho in Boise, there are few previously recorded prehistoric archeological sites within the national historic site. The historic sites are primarily associated with the occupation of the camp in the 1940s. Site records for a six township area did not yield any major Paleo-Indian sites such as those summarized by Yohe and Woods (2002). The closest one is Wilson Butte Cave, listed on the National Register and noted for the first evidence of human occupation on the Snake River Plain, dating back at least 10,000 years. There are also a dozen or so relatively small lithic scatters about eight miles southwest of site, near Interstate 84. It is possible that sites such as these and other subsurface materials may be found in the future despite the amount of land disturbance that took place with the construction of the camp, its removal, and subsequent agricultural use.

8. Historic Structures and Cultural Landscapes

The park encompasses less than 10 percent of the historic Minidoka War Relocation Center, including the historic entrance area, administration area, staff housing area, warehouse area, the swimming hole, root cellar, and riparian area along the North Side Canal. Much of this land was fenced after the camp was decommissioned, limiting the types and degree of physical modification to the camp. Since the historic period, the lands have generally remained open and unused, except for cattle grazing and use of the site by the Bureau of Reclamation.

The existing cultural landscape within the national historic site has been severely compromised by the removal of historic buildings and structures as well as the construction of Hunt Road, which bisects the site. Despite this overall loss, the national historic site retains fragments of some landscape characteristics. The most common types of historic landscape resources are building foundations, road alignments, parking areas, walkways, vegetation, and remnants of buildings and structures. These resources provide clues to the spatial organization, land use, cultural traditions, circulation, and vegetation that existed during the historic period.

Of the more than 600 buildings once located at the original nearly 34,000-acre Minidoka War Relocation Center, only six buildings remain. Of these six, four are in their original location, including the fire station, part of a warehouse, a former restroom, and the root cellar. There are, however, numerous other remnant structures.

Before being transferred to the NPS in 2001, much of Minidoka NHS was federal land managed by the BOR. The dump site was also formerly federal land managed by BOR. During ownership by BOR, much of the area was fenced off, limiting the type and degree of physical modifications to the site. The contributing landscape characteristics are fragmented due . . . in large part to the transition of the landscape from a WRA center to a homesteading community following decommission of the camp (NPS 2007: 53-54). The area continues to be a rural farming community.

The cultural landscape characteristics that contribute to the site's integrity include natural systems and features, spatial organization / cluster arrangement, buildings and structures,

circulation, cultural traditions, vegetation and archeological sites. These landscape characteristics convey the five aspects of integrity, including location, design, setting, feeling and association.

Natural Systems and Features (natural aspects that have influenced the development of a landscape, such as geomorphology, hydrology, ecology, climate, and vegetation): “These landscape characteristics are still apparent in the rolling high desert steppe, basalt outcroppings, absence of natural surface water, low growing sagebrush vegetation, and the open and expansive views NPS PWRO 2007:57).”

Spatial Organization / Cluster Arrangement: The war relocation center was laid out according to a “theater of operations” style typical of temporary military installations; however it differed from other centers in that the blocks of barracks were laid out along the existing contours of the North Side Canal and basalt outcroppings to the north and east in a crescent shape, rather than in a rectangular shape. Approximately 950 acres, of the more than 33,000 acre site, were developed. Core areas included the entrance area, administrative complex, staff housing area, warehouse area, sewage treatment complex, military police area and hospital area. Surrounding these were the two residential areas spanning three miles and comprising 36 blocks, with 12 residential barracks, a mess hall, recreational hall and lavatory / laundry facility. Between the blocks were open areas with recreational facilities (baseball, basketball, tennis, and volleyball courts), and gardens and at least two parks. Initially the area had 208 boundary signs; later a perimeter barbed wire fence and eight guard towers were constructed. Although the fence was initially constructed surrounding the camp, after six months all but a portion along the North Side Canal and around the central core area was removed. Beyond the residential blocks were livestock areas to the east, agricultural fields, irrigation ditches, the dump and a cemetery (NPS MIIN 2007:58-59).

“Today many features . . . provide clues to the original extent and design of the camp. These features include the entrance sequence and parking area, numerous building foundations and walkways in the central core area, extant structures such as the root cellar and remains of the military police building and reception building, and landscape features such as the garden, historic vegetation, circulation systems, canals and the Hunt Bridge (NPS MIIN 2007:59).”

Buildings and Structures

Buildings

From more than 600 buildings, approximately 25 features, including buildings, building ruins and structural features assist in conveying the historic character of the site. Most structures were constructed of timber frame and were utilitarian and temporary. They were constructed on pre-cast concrete foundations or slabs, depending on their purpose. Among the few masonry structures were incinerators, the hospital smoke stack, the military police and reception buildings and one side of an administration area building. The auditorium was also constructed simply, but with a higher standard (NPS MIIN 2007:59-62).

Military Police Building: This structure was used to regulate all entry and exit associated with the camp. It was 20 x 10 feet (with two small rooms) and constructed of cut basalt stone, gathered locally, with a wood frame on top (NPS MIIN 2007:63-64).

Reception Building: This small building (15 x 33 feet) was next to and constructed with the military police building in the same style (stone base and timber frame) but with a basalt fireplace instead of a wood stove. A 14-foot long (three feet high) wall connected the two buildings (NPS MIIN 2007:64).

Root Cellar: This timber frame building with a roof of hay bales, tar paper and sod was constructed in 1943 by incarcerated to store potatoes and root vegetables during the winter.

Historic preservation (emergency stabilization) occurred in 2003 to replace damaged support columns and beams and to stabilize columns with cross supports, while removing fallen debris (NPS MIIN 2007:63).

Residential Block Area: Most barracks buildings (20 x 120 feet) were standard military design, with timber-framing, tar paper siding and without indoor plumbing. Some staff housing was apartments with kitchens, bathrooms, and white clapboard siding with roll roofing rather than tar paper. . . The buildings were designed to be inexpensive, rapidly constructed and required few materials. Two barrack modules formed the 40 x 100 foot mess hall. Variations were used for recreation halls and staff structures. The lavatory / laundry buildings were constructed of two 20 x 60 foot sections and connected by a 20 x 20 foot boiler room (NPS MIIN 2007:61-62).

Administration Area: There were 19 buildings in this area in an arc along the primary entrance road. Of these, footings of the Post Office and a garage (with rock-lined foundation), warehouse slab, substation footings, sewer manholes, along with the footings and slabs of staff apartments and basalt-lined pathways remain (NPS MIIN 2007:65).

Warehouse and Motor Pool Area: There were 19 buildings (17 warehouses, a gas station and lavatory) in this area, including receiving, storage, motor vehicle repair, refrigerated storage, co-op storage, and offices and shops for engineers, carpenters, plumbers and electricians. (NPS MIIN 2007:65-66).

Warehouse #5 (Motor Pool and Tire Shop): The concrete slab of this warehouse measures 112 x 48 feet. On the eastern end of this slab is located almost one half (43 percent / 3 of 7 bays) of an original warehouse. The building contains original windows and doors and interior features, including some tire repair tools hanging on one of the wood columns. The post and frame building rests on original footings that have been modified over the years to combat ongoing deterioration, including rot of the sills. The rest of the building was either dismantled and used for building materials or moved to another location and a new west wall was constructed. Like other warehouses, it was originally sided with tar paper and battens, but now has a corrugated metal exterior. A small enclosed room is located on the interior northeast corner. When the building was first acquired it also contained an original pot-bellied cast iron stove, which was later stolen.

It is Warehouse #5 that is proposed to be rehabilitated as a visitor contact station, historic structure and interpretive exhibit. Warehouse #5 was formerly owned by the U.S. BOR and was used by the American Falls Reservoir Irrigation District #2 for its operations.

Warehouse #9 (Refrigerated Warehouse): It is the pad of Warehouse #9 that is proposed to be rehabilitated to allow for the placement of a small building to house the water treatment facility and a small tank that would be part of the fire suppression system. A fence to replicate the mass and form of the warehouse is also proposed to screen the building and tank.

Warehouse Area: Lavatory (Building #25): The lavatory that served the warehouse area is still present at the camp. It is located just east of the Motor Repair and Tire Shop (Warehouse #5). No modifications are currently proposed that would affect it.

Nonhistoric Buildings in the Warehouse Area

As described in Chapter II: Alternatives, four other buildings exist in the warehouse area. These include the old Bureau of Reclamation residence (1,612 square foot), old BOR duplex residence (2,912 square feet), and City of Rocks Building (1,116 square feet). A house is located on the slab of Warehouse #6. The house is a former WRA apartment that was moved to its current location.

A duplex apartment building is located on the slab of Warehouse #9. The duplex building was originally a WRA staff housing building that was moved from the staff housing area to the warehouse area. A porch area, siding, and roofing have been added to the building and both former WRA buildings have been heavily modified and have lost integrity associated with their original uses (NPS 2007:65-66).

In addition, there is a small house located on temporary cinder blocks in the warehouse area (Slab 03). This building was moved from City of Rocks National Reserve in early 2000. It too has lost too much integrity to remain in or be restored as part of the historic scene.

Structures

Structures were similarly temporary and utilitarian. They included livestock facilities in the hog and chicken farms, sewage treatment clarifiers, irrigation laterals and drops, underground water and sewer lines, electric lines, wells, water towers, watch towers, fences, bridges, rock walls (in the entrance area) and recreational structures (NPS MIIN 2007:62, 64).

Perimeter Fence: The perimeter fence and guard towers were the camp security system. The fence was five feet tall with 6 x 6-inch wood posts with five strands of barbed wire and a wood overhanging member attached to the top of each fencepost pointing back toward the camp. While originally there were six miles of fence constructed (November 1942) circling the 950-acre developed part of the camp, only approximately one mile remained from April 1943 until the camp was decommissioned in 1945. That part was from the hospital area, through the entrance area and along the North Side Canal to the swimming hole (NPS MIIN 2007:66). A portion of this perimeter fence has since been reconstructed on the site.

Canals, Irrigation Ditches and other Water Features: These features were extensive but are generally located outside the current boundary of the site except for one of two swimming holes constructed by incarcerated which is located near the North Side Canal across from the Warehouse / Motor Pool area (NPS MIIN 2007:66-67).

Circulation: Four circulation systems are notable at the camp: the regional, entrance area, internal road system and pedestrian systems (NPS MIIN 2007:74).

Regional: The regional system was comprised of a regional transportation network via the Oregon Short Line Railroad between Jerome and Eden. A spur was constructed to within four miles south of the camp to transport incarcerated. Hunt Road was also constructed between Highway 25 and the camp (NPS MIIN 2007:74).

Entrance: The entrance area included Hunt Bridge, Hunt Road and administrative roads extending north and east as well as the garden, military police and reception buildings (NPS MIIN 2007:74).

Internal Roads: The internal road system included 12.43 miles of streets and parking areas. Roads were 18-20 feet wide and were bituminous, gravel, or improved earth with few or no drainage features (NPS MIIN 2007:75).

The pedestrian circulation system consisted of walkways and informal trails between buildings and other camp areas. Incarcerated built walkways throughout the camp elevated six inches above the ground, lined with basalt and filled with gravel. There were also wooden boardwalks constructed with scrap lumber (NPS MIIN 2007:76).

Little is left of the regional, entrance and internal circulation systems because Hunt Road, extended and reconstructed in the 1950s runs between the administration and staff housing areas in the camp and a new road (1400 East) heads north off of it along the western edge of the administration area. Still, 300 feet of Hunt Road (from the bridge past the garden to the administration area where two driveways branch off) follows its original alignment. The other roads (north of the administration area, staff housing road, and warehouse roads are overgrown but somewhat evident from their alignment and lack of woody vegetation (NPS MIIN 2007:76). Still other internal roads in the residential blocks were converted to irrigated farmland and/or are now privately owned.

Walkways throughout the camp, particularly in the administration and staff housing areas are fragmented and overgrown but provide evidence of their historic design, workmanship, materials and location. Extant features include elevation above the surrounding ground, basalt rock lining, and straight or curving alignments. Walkways can be used to discern former building entrances and sizes (NPS MIIN 2007:76).

The entrance parking area is approximately a third of its former size and contains nonhistoric sidewalks along the remnant buildings (NPS MIIN 2007:77). It now also contains a reconstructed guard tower.

Cultural Traditions (expressions of ethnicity in the physical landscape): Cultural traditions at the camp included the ornamental gardens, including the Honor Roll garden, civic landscape projects, and Japanese vegetable gardens and crops. The “. . . incarcerated adapted structures and spaces to serve both personal and community-oriented biases, needs and traditional use. These adaptations occurred at several levels and influenced land use patterns, stylistic conventions, applied building forms, the use of materials, stylistic preferences in the design of gardens and selection of crops for dietary preferences” (NPS MIIN 2007:80). Besides the garden at the entrance, there were ornamental gardens in Blocks 2, 5, 26, and 34 and a wildlife preserve near Block 13, 15 and 17. The features of the ornamental gardens included “1) strategically placed and selected basalt rocks and boulders, 2) mounds, 3) a small architectural feature such as a bridge or a temple, 4) a path or stepping stones, 5) a screening device such as a fence, 6) transplanted and tended native plants, 7) a collection of flowering plants, and 8) a water feature such as a fish pond. The plants mentioned in documents included grasses, mint, cattail, reeds, willows, cactus, desert moss, bunchgrass and sagebrush” (Hosokawa 1943 or 1944: 1-4 in NPS MIIN 2007:81). According to the CLI, remains of the gardens include the Honor Roll garden, the wildlife preserve, and Block 34 pond on adjacent private property, and the Block 5 garden moved to Seattle after World War II (NPS MIIN 2007:81). Among the cultural vegetables grown by incarcerated include daikon radish, napa cabbage, burdock root, adzuki beans, and edible chrysanthemum.

Vegetation (includes native and non-native deciduous and evergreen trees, shrubs, forbs and plant communities used during the War Relocation Center period): Beginning in spring 1943, hundreds of trees, shrubs, perennials, annuals and lawns were planted throughout the central camp area. Individual and communal victory gardens were also established in every block, at the schools and in the staff housing areas. The outlying agricultural fields supported harvests of over 2 million pounds of produce for 1943 and over 7 million pounds for 1944. Potatoes, cabbage, turnips, nappa cabbage, onions, and tomatoes were among the largest scale crops in 1943. In 1944, in addition to these crops, the camp planted and harvested more than 450 acres of beans and grain crops. The bumper harvest of 1944 allowed the Center to become a self-sustaining system (Irrigator, September 16, 1944). The creation of the North Side Canal allowed emergent, aquatically-adapted plants to grow near the Canal’s edge, and disturbance regime plants and trees to grow along the Canal corridor (NPS MIIN 2007:86).

Today only remnant historic vegetation exists – eight black locust trees in the garden area and approximately 30 other trees scattered throughout the entrance, administration and staff housing areas. A lilac and rosebush are also found in the staff housing area (NPS MIIN 2007:86).

The CLI recommended that an arborist evaluate the remaining historic trees, assessing their health and providing stabilization recommendations, however this has not yet been completed. It also recommends removal of vegetation from the concrete slabs and a systematic inventory of vegetation to identify contributing historic vegetation and to generate recommendations for prevention and/or eradication of noxious weeds and invasive plants.

The following impacts associated with vegetation are identified in the condition assessment:

Vegetation / Invasive Plants

Both native and non-native vegetation have intruded on all historic building slabs in the warehouse area and at Building 35-Warehouse Office, obscuring these camp features. The roots of the vegetation, particularly larger shrubs and trees, have created and expanded cracks in the concrete foundations, accelerating their deterioration (NPS MIIN 2007:90).

Over the past 60 years, native and non-native plants and noxious weeds have taken over the site. Non-native species were introduced during the WWII era and as a result of agricultural activities in and around the National Monument since WWII. Of the 12 documented non-native species on the site, 7 were determined to be noxious weeds by the NPS Exotic Plant Management Team. Many of these plants, including cheatgrass (*Bromus tectorum*), displace native vegetation that was present during the period of significance and obscure the vegetated open space areas at the site (NPS MIIN 2007:90).

... impacts from these activities [irrigated agriculture and former cattle grazing] include obscuring the historic open space areas of the camp, destroying native and historic vegetation, and creating the potential for introduction of non-native and noxious plants (NPS MIIN 2007:91).

Another more specific recommendation calls for a restoration ecologist to develop a plan for invasive plant and noxious weed management (NPS MIIN 2007:92). This recommendation was partially fulfilled with the Northern Rocky Mountains Invasive Plant Management Plan (NPS PWR 2011), however a restoration plan is still needed.

Archeological Sites: Four separate investigations (1999, 2001, 2004, 2006) have identified a wide range of features that remain from the war relocation center as well as significant artifacts that portray the daily life and cultural traditions of the incarcerated (NPS MIIN 2007:87).

9. Visitor Experience

Visitor Access

Access to Minidoka National Historic Site is via private vehicle from Interstate 84 and U.S. Highway 93, north of Twin Falls via State Highway 25 near Jerome. There is no public transportation to the site. Although there are currently no highway signs on either Interstate 84 or U.S. Highway 93 directing visitors to the site, directions to the park are available on the park's website (www.nps.gov/miin). Once visitors have found the intersection of Highway 25 and Hunt Road, there is a wayfinding sign that directs visitors to the site.

Overnight accommodations are not available in the park. Tent and RV campsites are located in the vicinity in many places. Hotels and other privately operated accommodations may be found in the neighboring towns of Twin Falls and Jerome, Idaho as well as further afield.

According to the GMP, Hunt Road is on the historic alignment of the original Minidoka WRA Center road from Hunt Bridge, through the historic entrance and former administration area, where it deviates to cut through the former administration and staff housing area, then along the southern edge of the old warehouse area and root cellar and continue north of where the North Side Canal turns south. The rest of the former administration road (approximately 1,425 feet), within the site is an unpaved road which leads to the former site of the water tower and fire station and then veers off toward the Warehouse Area. This remaining portion of the former administrative road had been intended to become a public road accessing the interior of the site and would under Alternative 3, however under Alternative 2, it would remain an administrative road (see Chapter II: Alternatives), which would result in a change to the direction provided in the GMP.

The GMP anticipates that visitation to Minidoka could be approximately 80,000 people per year, with a daily estimate of 225 people. Current visitation is unknown except associated with the annual pilgrimage in June, which attracts approximately 250 people at one time. The 2013 Minidoka NHS Long Range Interpretive Plan states that in 2010, a counter at the entrance to the historic site registered over 4,060 vehicles. Total visitation to both Minidoka and Hagerman Fossil Beds was reported as 43,853 in 2014, and, for Minidoka, an additional in-person (off-site) outreach of 669 (Geniac 2015). Upon installation of signage along Interstate 84 and U.S. 30 and initiation of education programs, visitation increased 200 percent to Hagerman Fossil Beds National Monument (NPS PWR 2006).

Visitor Use Opportunities

Visitor Facilities

Minidoka National Historic Site currently does not have a visitor contact station or visitor facility, except portable toilets at the historic site. At Hagerman Fossil Beds National Monument Visitor Center there is a modest exhibit room dedicated to information on Minidoka. The staff creates temporary exhibits that highlight Minidoka themes. In its media room, Hagerman also hosts traveling exhibits associated with the Japanese American incarceration story. Interpretive materials include a general park brochure and four site bulletins available to visitors. The bookstore at Hagerman also carries items pertaining to Minidoka.

Twenty-three wayside exhibit panels were installed at Minidoka in 2009, 2011, and 2012. These wayside exhibits are part of the 1.6 mile long interpretive trail at the site. In 2012, two original buildings were transported from off-site and returned to the park. Although their original sites were unknown, they have been placed in Block 22. Approved planning documents have identified the future use of both of these structures for interpretive programming (NPS 2013).

Minidoka also has a traveling exhibit, developed by park staff, which is available for use by schools, government and private agencies, service groups, and Minidoka NHS partners for assistance in telling the Minidoka story. A funding proposal has been submitted for the development and production of an audio-visual program to help visitors learn more about Minidoka NHS, including the Bainbridge Island Unit.

Near the Minidoka NHS entrance is a small commemorative area, near the former Honor Roll garden, that also contains a few interpretive wayside exhibits. In this area, the Honor Roll sign has been reconstructed and the trail restored. Since construction of the trail in 2011, there have been

opportunities for visitors to walk through the site on the 1.6 mile loop trail, which begins near the entrance and loops through the site toward the warehouse area and back.

As noted above, there are no permanent public facilities on the current 300-acre property. There is no potable water, no emergency means of contact, no picnicking facilities, and no shelter from harsh temperatures and winds in the summer and winter.

There is parking space for approximately six cars in the entry area. Another approximately 12 vehicles can park in an unimproved area near the warehouse. Future plans include delineated and improved parking areas in the vicinity of the proposed visitor contact station and the former entrance.

Visitor Use Opportunities

As described above, information about the site is available at the Hagerman Fossil Beds visitor center in Hagerman. Despite minimal visitor facilities at the site, information about it is available on the Minidoka NHS website. The Jerome County Historical Society Museum provides another opportunity for visitors to learn about Minidoka and the Friends of Minidoka also have a website with additional information. The new (2015) Twin Falls Visitor Center has interpretive panels and information about Minidoka. Other information centers in the area also distribute information materials about the park.



Figure 21: Reproduction Honor Roll at Park Entrance

Among the visitor use opportunities available at the site is a 1.6 mile interpretive trail. Exhibits along the 1.6-mile trail identify the historic structures and landscape, describe camp life, and explain how the center

operated. They invite visitors to imagine the camp teeming with

the thousands of people who were incarcerated there between 1942 and 1945.

Former incarcerated return to Minidoka frequently. Many former incarcerated and their family members, and a growing number of other interested visitors, participate in an annual Pilgrimage. The first pilgrimage occurred in 2003. In 2014, approximately 150 individuals attended the 4-day (including travel time) pilgrimage event. This past year, there were between 200 and 250 participants.

The Minidoka Pilgrimage website advertises the following for the 2015 event.

- There is access to an original barrack building and mess hall. People will be able to go in portions of both historic buildings.
- The reconstructed fence is complete. It runs about one mile in length from the stone entrance buildings along the North Side Canal to the historic swimming hole. The trail is parallel to the fence, so that visitors can see the fence and walk along it.
- There is a new collections storage building completed to house Minidoka collections items at Hagerman Fossil Beds.

- There will be guided tours of Minidoka National Historic Site by NPS staff.
- There will be a commemorative closing ceremony at Minidoka following the pilgrimage (www.minidokapilgrimage.org).

Park staff has hosted, assisted, and/or participated in civil liberties events such as the pilgrimage locally and across the U.S.

The Jerome County Historical Society promotes the history and historical objects of southern Idaho, especially for Jerome County. The Society maintains a museum in Jerome and administers the Idaho Farm and Ranch Museum (I.F.A.R.M) near Twin Falls. One of the four themes highlighted at the museum is the Minidoka War Relocation Center. Many artifacts and archival materials are on display. In addition, two original barrack buildings were moved to the I.F.A.R. M. site; one of these buildings contains information relating to Minidoka (NPS 2013).

Interpretation and Education:

From April through October, depending on staffing levels and weather conditions, there are ranger guided walking tours at Minidoka NHS. The tours last approximately two hours and are offered approximately twice per week, as well as by special appointment (NPS 2013). During the school year, park interpreters give programs by reservation to school groups, civic organizations, and other organized groups. Topics for guided tours are customized to meet the group's interest.



**Figure 22: One of the mess halls during the historic period
(photo from www.nps.gov/miin)**

Park staff also conducts “Porch Programs” at the Hagerman Fossil Beds National

Monument Visitor Center from June through September. Approximately once a month the program relates to Minidoka. Offsite programs are also available to school and civic groups and are conducted by park staff, including the Superintendent, in the surrounding communities.

The park introduced its first Junior Ranger Program in 2011 and is in the process of enhancing this self-directed activity based program for a variety of age groups.

The NPS collaborated with Densho: the Japanese American Legacy Project in Seattle to develop curriculum that helps students examine critical issues affecting the past and present U.S. democracy, including: individual rights in wartime, the role of news media and other sources of information, and the protections promised by the U.S. Constitution and our system of government. Three units were developed for grades 4-12 that meet Idaho, Washington, and Oregon state curriculum standards.

The staffs of Minidoka and Manzanar national historic sites have collaborated to develop a series of informational and educational materials. These include: a brochure, site bulletins (on the following topics -- Timeline: Japanese Americans during World War II, War Relocation Centers, Executive Order 9066, Glossary, Museum Collection, and Honor Roll); and informational handouts (including a Minidoka Location Map and Minidoka War Relocation Center 1945 Map).

The Hagerman Fossil Beds NM Visitor Center bookstore contains a variety of adult, young adult, educational, and informational fiction and nonfiction titles that reveal information related to the historic Minidoka War Relocation Center and the incarceration of Japanese Americans during WWII (NPS 2013).

In 2008, legislation added the Bainbridge Island Unit in Washington State to Minidoka National Historic Site. This unit has its own set of goals to interpret the connected story and historic event of the WRA era. Information on both of these units is on the Minidoka National Historic Site website.

Visitor and Employee Safety

Minidoka is isolated, located approximately 17-21 miles from the nearest towns containing emergency services (Twin Falls and Jerome, Idaho). NPS has no regular presence on-site. Staff is occasionally present for short intervals to support minimal interpretive programming and maintenance. NPS staff travels to the site from Hagerman Fossil Beds, approximately 38 miles away. Both staff and visitors are often at the site alone. Therefore, for emergency communication, visitors (and staff) must rely on personal cell phones (NPS 2009).

Information on the park's website directs visitors to:

- Wear sturdy footwear, a hat, and sunscreen.
- Bring water. There is no water available at the site.
- Stay on the trail.

The website also advises visitors that:

- Pets are not allowed on the trail.
- There is little to no shade at the site.
- Portable toilet facilities are available.
- In winter, check road conditions to the site.
- Collection of artifacts, rocks, plants, animals, or any other object within the National Historic Site is strictly prohibited. Help preserve your park by taking only memories and photographs.

The site contains a variety of old dilapidated buildings, structures, remnant roads and foundations from World War II that do not meet building codes and which are not protected by fire suppression systems or onsite security. The relationship of the buildings and structures to the former War Relocation Center is not readily apparent to the public because most buildings have been removed and there have been additional changes in topography related to ongoing use of the area for farming and agriculture. Except for U.S. 25, which passes through and adjacent to the site and the 1.6 mile interpretive trail circulation through the area during the historic period is not apparent.

Much of the site is overgrown with historic and non-historic nonnative invasive vegetation, some of which has been removed in recent years. Recent projects have included removal of nonnative Russian olive trees lining the Northside Canal, and removal of other vegetation near the Herrmann House. A small number of dilapidated buildings remain. Because of needs to increase

stabilization and to restore the infrastructure, there are limited opportunities for the public to step inside facilities. Unless guided, the buildings offer an outside-only view. Visitors can also peer into some windows and into the root cellar from behind a fenced area. Many of the buildings have been infested by mice. The rehabilitation of the Herrmann House will require opening the walls to remove droppings and eliminate openings being accessed by mice. Located periodically throughout the site are demolition piles and isolated pieces of rock, metal, glass and wood debris from when nearby structures were demolished. Since 2010, however, a range of actions have improved the site by removing hazardous materials not part of historic archeological sites.

At the camp entry area, on Hunt Road, there are a few waysides, the reconstructed guard tower and a small portable toilet. Across the road is the Honor Roll garden and some additional wayside exhibits. Between the two areas, there is seasonal high speed and volume traffic from ranching and farming on Hunt Road.

Aside from the portable restrooms at the entrance to the site and near warehouse #5, there is no shelter within the park, which is exposed to high winds during much of the year. During the winter, there can be multiple days and periods where temperatures drop below freezing, and during summer temperatures can soar to above 100°F. No potable water is available at the site.

There have been a variety of minor accidents and vandalism at the site, including vehicle accidents near the entrance and at the root cellar and numerous incidents of visitors suffering near misses or being injured by tripping over debris lying on the ground. A number of artifacts, including an original wood stove have been stolen and there has been repeated evidence of forced entry to several of the now locked buildings.

10. Park Operations

Existing park administrative operations are based 38 miles away in Hagerman, as part of the co-managed Hagerman Fossil Beds National Monument. Hagerman staff provides administrative support, facility maintenance, nonnative invasive vegetation management, occasional on-site presence and intermittent interpretive activities. It takes staff approximately one hour to drive from the Hagerman headquarters to Minidoka National Historic Site. Upon rehabilitation of the Herrmann House, staff will be duty stationed at Minidoka and will be more available to provide site security and visitor information. The long term goal is to staff the visitor contact station year-round with an established interpretive program (NPS 2013). Approximately 10 FTEs (full-time equivalent) employees are funded to jointly manage Hagerman Fossil Beds National Monument and Minidoka National Historic Site; their time is split between these sites.

Park operations for Hagerman and Minidoka include the following divisions: administration, maintenance, interpretation and education, and integrated resources management. In addition to the superintendent, there are chiefs for each of these divisions who manage additional staff that carry out operations, such as day-to-day maintenance, administration and natural and cultural resources management. The museum curatorial facility is also responsible for collections management for other nearby parks (Craters of the Moon, City of Rocks, etc.). Because the management of Hagerman Fossil Beds National Historic Site and Minidoka National Historic Site are combined, the following information applies to both parks.

The superintendent is responsible for overall administration and management of the park, including decision-making, outside organizations, internal NPS and DOI management, other governmental officials, and public audiences.

The administration division is responsible for the park budget, fiscal and real property management activities, revenue and fee management, contracting, information technology services, concessions management, tribal consultation, and human resources.

The integrated resources management division is responsible for preserving and managing the natural and cultural resources of the park and coordinating scientific research. They are responsible for natural and cultural resources inventory, monitoring and evaluation, impacts restoration and mitigation, maintaining museum collections, and fish and wildlife management, as well as consultation with the state historic preservation office and other resources agencies.

The interpretation and education division facilitates the connections between park resources and the public through the operation of the park visitor contact station, conducting public programs, designing and improving exhibits, creating written materials, conducting offsite programs, and maintaining the park's website and social media outreach. The division is also responsible for managing visitor use in the parks.

The maintenance division maintains the park's infrastructure (buildings, sanitation, and equipment (transported to and from Hagerman), as well as maintaining the grounds, interpretive waysides (visual and audio), and ensuring proper working order of utilities. This division plays a key role in orchestrating any infrastructure planning, modifications, or removal. Road-accessible, developed areas contain various infrastructure, including water treatment facilities, electric utilities, phone, trails, roads, parking lots, and administrative and public use buildings and structures.

The parks do not have a resource and visitor protection division. Responsibilities, such as enforcing laws, providing emergency medical services, fighting wildland fires, and performing search and rescue activities are done in coordination with local police, an area fire coordination center (BLM and local municipalities), and staff from nearby NPS sites.

Fire management operations are managed in cooperation with the Bureau of Land Management. Recent changes in wildland fire management policy have also resulted in direction for increased fire suppression in existing and potential sage grouse habitat, including rangeland with the potential for habitat (see also Vegetation section).

11. Socioeconomics

Minidoka is located within Jerome County, which is a generally rural area located just north of Twin Falls, Idaho. Its three largest towns are Jerome, Hazelton and Eden. In 2010, the population of the county was 22,374, with a population projection for 2014 of approximately 22,818 people.

In 2013, approximately 95 percent of the population was white, 3.5 percent were of Hispanic or Latino origin, 1.5 percent of two or more races, 2.3 percent of American Indian or Alaska Native origin, and 0.5 percent were Asian.

Although the State of Idaho ranks third of the states with the highest percentage of federal land (63.1 percent) after Nevada and Utah, Jerome County is mostly privately owned (72.1 percent). Jerome County has approximately 25.1 percent federal land. As a result, most land around Minidoka is privately owned and is used for agriculture or grazing. County zoning, however, allows for industrial agriculture such as feedlots and a very large concentrated cattle operation is permitted and may be constructed within one mile of the park. The North Side Canal which

comprises the southwest and south east boundaries of the site is also privately owned by the North Side Canal Company.

Key industries in Jerome County are primarily farming and agriculture, including dairies and feedlots (30 percent of employees, 45 percent of wages), with commercial and industrial areas limited to the major towns (NPS 2006: 206). Service jobs, such as wholesale and retail trade are increasing in urban areas, such as in the cities of Jerome and nearby Twin Falls. Examples of larger industry entering the area include: the world's largest yogurt manufacturing plant (Chobani) (in 2012), a Cliff Bar bakery plant (2015), and a Specialty Sales LLC production plant -- a cattle hoof-bath company (2015).

National Park Service sites in southern Idaho, including City of Rocks National Reserve, Craters of the Moon National Monument and Preserve, Hagerman Fossil Beds National Monument, and Minidoka National Historic Site, provide an economic boost to the region. According to a research report on 2014 National Park Visitor Spending Effects the following table of information is relevant to the southern Idaho park units and their adjacent communities.

Table 2: Visitor Spending at Southern Idaho National Park Units

| Park Unit | Total Recreation Visits (2014) | Total Visitor Spending (\$000s, \$2014) |
|--|--------------------------------|---|
| City of Rocks National Reserve | 94,285 | \$5,318.1 |
| Craters of the Moon National Monument and Preserve | 214,993 | \$7,172.0 |
| Hagerman Fossil Beds National Monument | 22,483 | \$1,261.0 |

Source: http://www.nature.nps.gov/socialscience/docs/VSE2014_Final.pdf

Note: There was no information in the report for Minidoka National Historic Site. This may be due to the fact that the site is relatively new, with no visitor center or contact station of its own, but rather has a small shared space at the Hagerman Fossil Beds NM Visitor Center.

Table 3: Employment Contribution from Southern Idaho National Park Units

| Park | Jobs | Labor Income (\$000s, 2014) | Value Added (\$000s, 2014) | Output (\$000s, 2014) |
|--|------|-----------------------------|----------------------------|-----------------------|
| City of Rocks National Reserve | 85 | \$2,142.4 | \$3,447.7 | \$6,149.4 |
| Craters of the Moon National Monument and Preserve | 112 | \$2,626.2 | \$4,285.6 | \$8,111.8 |
| Hagerman Fossil Beds National Monument | 22 | \$ 602.1 | 934.4 | \$1,674.2 |

Source: http://www.nature.nps.gov/socialscience/docs/VSE2014_Final.pdf

Chapter IV: Environmental Consequences

A. Methodology

NEPA requires that environmental documents disclose the environmental impacts of the proposed federal action, reasonable alternatives to that action, and any adverse environmental effects that cannot be avoided should the proposed action be implemented. In this document, *effects* and *impacts* are used interchangeably. This section analyzes the environmental impacts of project alternatives on affected park resources. These analyses provide the basis for comparing the effects of the alternatives. NEPA requires consideration of context, intensity and duration of potential impacts, indirect impacts, cumulative impacts, and measures to mitigate impacts. In addition to determining the environmental consequences of the preferred and other alternatives, *NPS Management Policies* (NPS 2006) and Director's Order-12, *Conservation Planning, Environmental Impact Analysis, and Decision-making* (NPS 2001) require analysis of potential effects to determine if actions would impair park resources. The basis for understanding the analysis within this chapter is provided below.

An *Impact Comparison Chart* (Table 4) is provided at the end of this chapter.

1. Definitions

Context of Impact: The context is the setting within which impacts are analyzed – such as the project area or region, or for cultural resources – the project area or area of potential effects.

Type of Impact: The type of impact is a measure of whether the action will improve or harm the resource and whether that harm would occur immediately or at some later point in time.

- **Beneficial:** The impact would improve the resource or the quality or quantity of the resource.
- **Adverse:** The impact would harm or deplete the resource or its quality or quantity.
- **Direct:** The impact would be caused by and occur at the same time and place as the action.
- **Indirect:** The impact would be caused by the action, but would occur later in time, at another place, or to another resource.

Duration of Impact: Duration is a measure of the time period over which the effects of an impact persist and may be short-term (quickly reversible and associated with a specific event such as construction during project implementation); or long-term (reversible over a much longer period, or may occur continuously based on normal activity).

Area of Impact: Impacts may be localized, detectable only in the vicinity of the activity, or widespread, detectable on a landscape or regional scale.

Intensity of Impact: In this document, the intensity of impacts is measured using the following scale: negligible, minor, moderate, and major. These are defined collectively for the resource impact topics as described below. In addition, determinations of effect for actions that would affect threatened or endangered species comply with Section 7 of the Endangered Species Act (no

effect; may affect, not likely to adversely affect; and may affect, likely to adversely affect), while determinations of effect for cultural resources comply with Section 106 of the National Historic Preservation Act (no historic properties affected, no adverse effect, and adverse effect).

Impact Mitigation: Impacts have been assessed under the assumption that proposed measures to minimize or mitigate the impact would be implemented. The following terms identify the way to change the intensity of impacts or to change the resource condition following impacts. Project actions can:

- **Avoid** conducting management activities in an area or at a time that affects the resource;
- **Minimize** the type, duration or intensity of the impact to an affected resource; and
- **Mitigate** the impact by:
 - **Repairing** localized damage to the affected resource immediately after an adverse impact;
 - **Rehabilitating** an affected resource with a combination of additional management activities;
 - **Compensating for** a major long-term adverse direct impact through additional strategies designed to improve an affected resource to the degree practicable.

2. Impact Analysis

Except where noted within the environmental impact analysis sections (and where noted associated with special status species and cultural resources), the following definitions are the same for all resource impact topics.

Context of Impact: Changes were considered within Minidoka National Historic Site or regionally (applicable to air quality, special status species, cumulative impacts etc.).

Duration of Impact: *Short-term:* These impacts are often quickly reversible and associated with a specific event such as construction during project implementation, occurring for a period of less than one to five years. *Long-term:* These impacts are reversible over a much longer period, may occur continuously based on normal activity, or may occur for more than five years.

Methodology: Most impacts were assessed qualitatively, based on the best professional expertise of NPS staff. Some impacts, where quantities were known were assessed quantitatively and/or estimated.

Type of Impact: Beneficial impacts would improve the quality of the resource, while adverse impacts would harm or change the quality of the resource.

Intensity of Impact for Special Status Species

- **No Effect:** The project (or action) is located outside suitable habitat and there would be no disturbance or other direct or indirect impacts on the species. The action will not affect the listed species or its designated critical habitat (USFWS 1998).
- **May Affect, Not Likely to Adversely Affect:** The project (or action) occurs in suitable habitat or results in indirect impacts on the species, but the effect on the species is likely to be entirely beneficial, discountable, or insignificant. The action may pose effects on listed species or designated critical habitat but given circumstances or mitigation conditions, the effects may be discounted, insignificant, or completely beneficial. Insignificant effects would not result in take. Discountable effects are those extremely unlikely to occur. Based on best judgment, a person would not 1) be able to meaningfully

measure, detect, or evaluate insignificant effects or 2) expect discountable effects to occur (USFWS 1998).

- **May Affect, Likely to Adversely Affect:** The project (or action) would have an adverse effect on a listed species as a result of direct, indirect, interrelated, or interdependent actions. An adverse effect on a listed species may occur as a direct or indirect result of the proposed action or its interrelated or interdependent actions and the effect is not: discountable, insignificant, or beneficial (USFWS 1998).

Intensity of Impact for Cultural Resources

In accordance with National Park Service Management Policies (2006), the analysis in this Environmental Assessment fulfills the responsibilities of the National Park Service under Section 106 of the National Historic Preservation Act.

- **No effect:** There are no historic properties in the Area of Potential Effect (APE); or, there are historic properties in the APE, but the undertaking will have no impact on them.
- **No adverse effect:** There will be an effect on the historic property by the undertaking, but the effect does not meet the criteria in 36 CFR Part 800.5(a)(1) and will not alter characteristics that make it eligible for listing on the National Register. The undertaking is modified or conditions are imposed to avoid or minimize adverse effects. This category of effects is encumbered with effects that may be considered beneficial under NEPA, such as restoration, stabilization, rehabilitation, and preservation projects. Under the terms of the 1999 PA, data recovery can mitigate affect to archaeological properties that are eligible for listing on the NR under criterion d. However, some archaeological sites are eligible as traditional cultural places under criterion A, and such mitigation may not be sufficient or appropriate.
- **Adverse effect:** The undertaking will alter, directly or indirectly, the characteristics of the property making it eligible for listing on the National Register. An adverse effect may be resolved in accordance with the Stipulation VIII of 1999 Programmatic Agreement, or by developing a memorandum or program agreement in consultation with the SHPO, ACHP, American Indian tribes, other consulting parties, and the public to avoid, minimize, or mitigate the adverse effects (36 CFR Part 800.6(a)).
- **Significant Impact:** An impact to a National Register historic property would be considered significant when an adverse effect cannot be resolved by agreement among SHPO, ACHP, American Indian tribes, other consulting and interested parties, and the public. The impact will diminish the integrity of location, design, setting, materials, workmanship, feeling or association characteristics that make the historic property eligible for inclusion in the National Register Historic Places. The resolution must be documented in a memorandum or programmatic agreement or the FONSI.

3. Cumulative Impact Analysis

The Council on Environmental Quality (CEQ) describes a cumulative impact as follows:

A “Cumulative impact” is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (Regulation 1508.7).

The cumulative projects addressed in this analysis include past and present actions, as well as any planning or development activity currently being implemented or planned for implementation in the reasonably foreseeable future. Cumulative actions are evaluated in conjunction with the

impacts of an alternative to determine if they have any additive effects on a particular resource. Because most of the cumulative projects are in the early planning stages, the evaluation of cumulative impacts was based on a general description of the project. These projects are included in the cumulative effects analysis presented in this chapter.

The following past, present and potential future projects were considered in the cumulative impact analysis:

- *Reconstruction of Block 22 Barracks and Mess Hall*

Under this proposal, historically verified structures including a barrack building and mess hall were relocated to the Block 22 area and are now used to interpret the incarcerated experience at the camp. The Long-Range Interpretive Plan calls for full development of Block 22, including the construction of barrack building that meets curatorial standards.

- *Acquisition of the Robison Property (Military Police Housing Area)*

The Robison Property was acquired and is being considered as a potential future location for overflow parking for large events, such as the annual pilgrimage.

- *Trail and Fence Plan Environmental Assessment (Finding of No Significant Impact 2011)*

Under this project, a site loop trail and replica of the 1945 perimeter fence were constructed (2011)

- *Construction of an Issei Memorial*

Under this proposal, the Friends of Minidoka would continue to seek funding for construction of a memorial to the Japanese elders interred at Minidoka. Although some locations have been proposed, none has been selected yet.

- *Reconstruction of the Entrance Guard Tower and Parking Area Modifications*

Under this proposal, a park entrance sign and reconstructed guard tower were constructed off of Hunt Road near the entrance to the historic site. The parking lot (footprint) is being modified to reflect the historic character of the entrance area.

- *Northern Rocky Mountains Invasive Plant Management Plan*

The Northern Rocky Mountains Invasive Plant Management Plan, approved in 2011 calls for more systematic identification, treatment and monitoring of nonnative plants, including noxious weeds.

- *Proposed Future Trail Connections to the Issei Memorial and Visitor Overflow Parking on the former Robison property*

Under this proposal, the existing trail would be joined to the Issei Memorial and proposed new visitor parking.

- *Stabilization and Restoration of the Root Cellar*

Under this proposal, the root cellar would be fully stabilized, the layering of the materials restored or replaced in kind, and the wooden entrances re-built to match the historic materials and dimensions.

- *Stabilization of the Firehouse*

A portion of this work has been completed: a material matching the appearance of tar paper, known as Derbigum, has been applied to the exterior to stabilize the historic fabric of the structure. A Historic Structures Report is needed to determine the best treatment plan for the structure. The process of requesting funding for this report is underway.

- *Reestablishment of Center Field*

Under this project, the park would replicate the central baseball field in the park to reflect its historic character. Because the site was used for ball games, memorials, graduations and other events during the years the Camp was operating, this use for ball games and other events that help the public gain a better understanding of this historic site is proposed.

4. Environmental Consequences

a. Geology and Soils Impacts

Alternative 1

There would be no additional impacts on geology or soils from the implementation of Alternative 1. Existing impacts in the vicinity of the Herrmann House and Warehouse #5 would continue. These discountable impacts include periodic disturbance of soils to maintain facilities, to remove nonnative invasive plants, to install signs and to conduct a variety of other routine and cyclic maintenance activities, such as mowing, sign installation, etc. Impacts, such as compaction, would also continue to occur from accommodating routine uses of the site, such as parking. There would also be periodic disturbance of soil related to ongoing site clean-up and removal of safety hazards.

Removal of Nonhistoric Structures

Removal of a former Bureau of Reclamation (BOR) house (1,612 square feet), former BOR duplex residence (2,912 square feet) and an unrelated (former City of Rocks) building (1,116 square feet) would have minimal adverse and beneficial effects on soils since these buildings are located on historic warehouse slabs, 6, 9, and 3. Removing the structures would likely allow some additional infiltration of water into soils beneath these concrete slabs and would result in some additional soil compaction in their vicinity as the buildings were dismantled or sold and removed intact. Similar to other warehouse slabs that remain from the historic period, including Warehouse #5, these slabs also exhibit cracking and deterioration.

Alternative 2

Among the impacts to soils would include soil removal, profile mixing, compaction and erosion. There is also some potential to find soil contamination since the warehouse proposed for rehabilitation was formerly used as an auto repair shop. Wherever excavation, fill, vegetation disturbance or removal, and construction occurred, soils would be affected.

Herrmann House

No excavation and minimal grading would occur to construct the foundation for the building. The crawl space insulation and vapor barriers would require excavation of approximately 40 square feet (300 cubic feet). Excavation and grading for the new septic system (tank and drainfield) would be approximately 400 square feet (1,600 cubic feet) and associated utility lines for water and septic (46 linear feet, approximately two feet wide) for the new septic lines. There would also be minimal excavation and grading to reconstruct the front and back entrances to the house (including providing an accessible ramp).

During excavation and grading, soils, including some rocky areas, would be mixed, moved and backfilled with native material and fill and compacted. Disturbance of area soils would cause a long-term localized changes in soil profiles, temporary loss of vegetation (for the utility lines and septic system), incremental long-term loss of vegetation (for the new accessible ramp, heat-pump

pad, and accessible and employee parking) and decreased soil productivity, especially where surfaces were hardened or compacted.

For the septic system, an area of 4.5 x 8.5 feet (300 cubic feet) would be disturbed for placement of a 1,000 gallon septic tank and 400 square feet for the drainfield. There could be effects on geological resources from excavation associated with utility lines emanating from the septic tank. Although the septic tank would be located in an area with friable soils that meet county percolation test requirements (avoiding basalt bedrock outcrops to the extent possible), extension of the lines from the Herrmann House could affect small rock outcrops, which are extensive in the vicinity.

Utility lines would be repaired, replaced and/or added and would extend from the Herrmann House to its improved well (approximately 65 feet from the northeast corner of the house) and to the new heat pump behind the building. New communications lines would also be added. Soils would also be disturbed, including covering areas with impermeable surfacing near the Herrmann House for the accessible ramp (210 square feet) and to place a small heat pump on a pad to the north of the building (12 square feet). Weatherizing the 960-square foot building envelope by rehabilitating the exterior walls and roof would also further disturb soils immediately adjacent to the building, including by compaction, as materials for these repairs were staged and used.

Parking and Access: Excavation, grading, and surfacing for accessible and employee parking (200 square feet) would affect the already highly disturbed soils in the area as would construction of an accessible gravel pathway (approximately 14 x 18 feet or 250 square feet) leading to the rear of the building and the accessible ramp from the parking area.

Fire Suppression System: The Herrmann House would also be provided with a fire distribution system from a 30,000-gallon tank that would be housed on the existing warehouse #9 slab. This system would also provide a fire suppression water supply for the historic fire station.

Visitor Contact Station

Warehouse #5 Rehabilitation: Excavation for construction of a new foundation for the west end of the building (new comfort station) would extend to a depth of two feet (approximately 50 cubic feet total), while excavation for the east end of the building (to reconstruct the foundation for the existing one-third of the warehouse plus the new addition would encompass 30 cubic feet. There would also be disturbance of soils for construction of a new concrete pad (building slab) across all seven bays of the current and former warehouse (5,040 square feet) including the area between the two buildings.

Although no additional impervious surfacing would be added (there is already a partial building and full, albeit deteriorated, concrete pad at the warehouse site), removal of the existing concrete pad and building foundation would be required.

Septic System: Approximately 1,280 cubic feet would be excavated for placement of the 4,000-gallon septic tank and another area of approximately 6,900 square feet would be excavated for the drainfield.

Utilities: New connections to the existing well and new plumbing for the employee and visitor restrooms would also be dug (approximately 150 linear feet for the well and 1,500 linear feet for other utility systems). These excavations would be approximately 2-feet wide and 3-feet deep, affecting approximately 9,900 cubic feet of soil. Electrical service would be supplied from existing poles near Hunt Road, preferably at or near the new entrance road. New service lines would be provided from there underground to Warehouse #5. Approximately 500 linear feet of lines would

be constructed. At approximately 2-feet wide and 3-feet deep, these would affect an additional 3,000 cubic feet of soil.

Employee and Visitor Parking/Turnaround and Site Access: Surfacing of areas near the warehouse would include new compacted gravel parking areas. The new gravel parking area is expected to encompass an area of 225 x 250 feet (56,250 square feet or 1.3 acres) to accommodate approximately 15 standard vehicles, three bus/RV spaces, two staff parking spaces and two accessible spaces as well as a vehicle turnaround. In addition, there would be circulation pathways extending from the visitor contact station to the parking area and from the visitor contact station to connect with the existing site trail.

Fire Distribution System (Warehouse Pad #9 Rehabilitation): Actions would be the same as noted above.

Construction Equipment and Materials Staging: Compaction from staging and construction activities, including the use of heavy equipment such as graders and backhoes would also temporarily result in reduced soil permeability and water storage capacity surrounding the construction areas. Permanent compaction, similar to the area affected by former historic uses for the Herrmann House, but less than that affected by the extent of the Minidoka War Relocation Center, would affect the 1.3-acre parking area for the visitor contact station and for the Herrmann House.

Trail Connections: Where connections to the existing trail around the historic site, native material would be graded and overlain with compacted crushed gravel and crushed gravel fill. Historic portions of the trail would continue to be elevated above the surrounding topography, while new portions would be flush with existing terrain.

Alternative 3

Impacts would be the same as in Alternative 2. In addition, there would be effects on soils and geology from reopening the road through the site to public vehicle traffic. This would require rehabilitation of the existing road (1,800 feet x 25 feet) to meet higher standards as a one-lane road (1.03 acres). Although widening would not be required, and in fact, could not be accomplished without adversely affecting historic resources, the existing roadway surfacing would be excavated and replaced with modern compacted fill (road base and surface course material) and signs to meet today's standards would be added to facilitate existing crossing of the roadway by the site circulation trail in several locations as well as improving entrance onto the road across from the existing Guard Tower / stone wall entrance.

Measures to Avoid, Minimize or Mitigate Impacts

Measures in the proposed project (as appropriate to the alternative actions) to minimize impacts to geology and soils would be as follows:

- Locate staging areas where they will minimize new disturbance of area soils and vegetation and historical features (Alternatives 2 and 3).
- Reuse excavated materials where possible in the project area (Alternatives 2 and 3).
- Import weed-free clean fill and topsoil (Alternatives 2 and 3).
- Limit clearing, excavation and grading to those areas necessary to facilitate rehabilitation of the historic structures (Alternatives 2 and 3).
- Clearly mark and delineate construction limits (Alternatives 2 and 3).

Cumulative Impacts: Over time there have been a variety of impacts to area soils and geology, including from construction of buildings and building foundations and from the excavation and

use of area materials in the development of the site for agriculture, farming, ranching, and War Relocation Center development (including farming, ranching and industrial uses). While these uses of the area are largely gone now, many impacts from them remain and are evident in the obvious disturbance to the site. Compared to impacts associated with former use of the site, impacts from proposed trail construction under Alternative 2 or 3 would contribute a small degree of adverse effects on soils and geology, while fewer adverse effects would continue to occur from the implementation of Alternative 1. Combined with future planning associated with the site from past, present and reasonably foreseeable future actions, effects on soils and geology could increase, but would remain comparatively small and localized.

Conclusion: Alternative 1 would have few to no (negligible) adverse impacts on soils and geology. Overall impacts on soils and geology from the impacts of actions in Alternative 2 would be greater than in Alternative 1, affecting a small, previously disturbed part of the overall site. Similarly, actions in Alternative 3 would cause slightly greater impacts from slightly more than one additional acre of disturbance. Impacts on geology would be unlikely to affect underlying bedrock, because areas of rock outcrops would be avoided for septic and utility line infrastructure.

b. Water Resources Impacts

Alternative 1

Because there is no naturally occurring surface water at the site and the North Side Main Canal is not within the park, there would continue to be no impacts on hydrology. Because there is no regular water use at the site, either for employees or visitors, there would be minimal impacts on water quantity. The existing well for the Herrmann House has not been in regular use for many years, but is periodically used for incidental work at the site, such as by the Northern Rocky Mountain Network Exotic Plant Management Team. Although there was formerly water use at the site for the residents of the BOR facilities, use ceased in 2008 when the property was turned over to the NPS.

Existing water quality impacts are small and are primarily related to periodic runoff from disturbed areas during periods of heavy precipitation, which could cause intermittent adverse impacts from a potential for increased sedimentation, due to the elevation of much of the camp above surrounding agricultural areas and the North Side Main Canal. There is also the potential for water quality impacts from the use of herbicides to treat nonnative invasive plants. Analysis of this use was discussed in the Northern Rocky Mountains Invasive Plant Management Plan (NPS PWR 2011).

Alternative 2

There would continue to be a potential for minimal impacts on water quality from park and adjacent actions. There would also be both short- and long-term impacts to water quantity.

Minimal impacts to water quality would occur from the installation of two septic systems, including tanks and drainfields. One would serve the Herrmann House, while the other would serve the visitor contact station. During percolation tests for the drainfield, the following were noted:

- Infiltration rates were measured to be between 2 and 7.5 inches per hour.
- Weathered basalt, cobbles, and boulders are present at shallow depths across the site.
- Hard excavation conditions should be anticipated for septic drainfields and utilities
- During unusually wet periods, perched water may be present on top of the weathered basalt.

Minimal short-term impacts to water quantity would occur with the initiation of construction, continuing and transitioning into long-term impacts as the rehabilitation of the Herrmann House and Warehouse #5 was completed. Long-term impacts on water quantity would arise with the supply of water to the Herrmann House for administrative purposes and to the visitor contact station for public use. Potable water would be provided in both facilities, including for administrative use of the kitchen at the Herrmann House and for flush toilets at both the Herrmann House and the visitor contact station.

The Herrmann House well produces an estimated 12 gallons per minute. This would be used to provide an estimated 160 gallons per day that is projected for the Herrmann House administrative facility. The well near the visitor contact station will be designed and installed to produce an estimated 25 gallons per minute, which would be used to provide an estimated 2,760 gallons per day for the visitor contact station. Although minimal landscaping would continue to surround and be added near the Herrmann House and the visitor contact station, these areas are not expected to be watered.

Potable water would be piped from the well at the visitor contact station to a 30,000 gallon tank, where it would be treated and stored for future use.

Because low flow toilets would be provided at both locations, utility systems would be selected to meet water conservation targets, and because there would be minimal use of water for sanitary use (hand washing), drinking stations and employee break facilities, overall use of water would remain low, but would increase substantially over current use.

In addition to water use for day-to-day employee and visitor use activities at the site, there would be a new fire suppression system which would store approximately 30,000 gallons in an onsite storage tank and pumphouse, likely on the pad for Warehouse #9. This warehouse was originally used for cold storage during the historic period. Later, 4-6 inch waterlines would extend from the storage tank across existing roads and pathways to Block 22, the Root Cellar, and the Fire Station.

Alternative 3

Water quantity impacts would be nearly the same as in Alternative 2. Although there would be a fully, rather than partially, enclosed visitor contact station, along with a different visitor parking configuration and a new rehabilitated one-lane road through the site following the historic alignment, except for short-term impacts during construction, there would be no additional anticipated needs for water use.

There would be a potential for a slight increase in impacts to water quality from heavy periods of precipitation that produced runoff associated with the road, however, because the rehabilitated entrance road would not be paved, it would remain semipermeable and would filter contaminants before they were released into nearby surface waters, including the North Side Main Canal. If evidence later demonstrated impacts, flow dissipaters could be added along the downslope(s) of the roadway.

Measures to Avoid, Minimize or Mitigate Impacts

Measures in the proposed project (as appropriate to the alternative actions) to minimize impacts to hydrology and water quality would be as follows:

- Minimize soil disturbance.
- Reseed or revegetate disturbed areas as soon as possible after disturbance.

The following are among the specifications included for the similar rehabilitation of the Herrmann House and would also be used for the rehabilitation of the warehouse:

- Erosion control measures shall consist of BMPs to prevent storm water discharges, including but not limited to silt fencing, barrier protectors, straw bales, temporary soil retention blankets, excelsior drainage filters, sediment traps and berms.
- Berms and excelsior drainage filters shall be used to form sediment traps and to control run-off into other areas, including creeks, streams, marshes, access roads, well areas, and the staging areas.
- Erosion control measures shall be used to contain only direct precipitation in the construction zone. The contained water shall be allowed to percolate into the ground or drain slowly through the drainage filter sediment traps. Earthen sediment traps or holding ponds shall not be used unless accepted by the Contracting Officer.
- Reduce runoff velocity as well as direct surface runoff around and away from all fuel containment, storage, and borrow areas. Divert surface runoff around and away from cut and fill slopes.
- Place drainage filters around all catch basins to create sediment traps to control runoff from the construction area.
- Excess water used for dust control shall be contained within the demolition areas by the erosion control measures.
- The Contractor shall prevent the deposition of materials onto paved areas. The Contractor shall inspect the paved areas for deposited materials weekly and remove the materials immediately.
- Paints and solvents used in the rehabilitation would have low volatile organic carbon (VOC) compounds.

Stormwater pollution prevention measures include:

- Furnish, install, maintain, and operate necessary control measures and other equipment necessary to prevent erosion as described in the approved pollution prevention plan.
- Before the work begins, sufficient equipment shall be available on the site to assure that the operation and adequacy of the erosion control system can be maintained.
- Sediment excavated from temporary sediment control structures shall be disposed on the site with general fill, or with topsoil. Sediment shall be allowed to dry out as required before reuse.
- The Contractor shall place the sediment removed from traps and other structures where it will not enter a storm drain or watercourse and where it will not immediately reenter the basin.

Cumulative Impacts: A variety of historic impacts to the site likely have affected groundwater quality and nearby surface water in irrigation canals. These include water withdrawal for domestic, agricultural and farming use and the presence of irrigation ditches and septic systems as well as the former latrines and wastewater treatment plant in addition to other operations associated with the Minidoka War Relocation Center (such as for the cannery and other industrial uses). More recently, apparent impacts have been associated with irrigation canals, farm and ranch operations and septic systems. Since 2008, however, there has been no occupation of the site. As a result, water use and potential impacts have greatly been reduced. Alternative 1 would continue to result in diminished water use and few to no ongoing impacts. Alternative 2 would contribute potential short-term negligible impacts to water quality and negligible to minor short-term impacts from the potential additional use of water. Aside from the existing proposal for a visitor contact station and administrative facility, there are few additional proposed uses of the site so future proposed impacts to water resources would likely remain minor.

Conclusion: There would be no additional impacts to water resources under Alternative 1. Alternative 2 would have a small degree of impacts on water quality and would likely increase water use at the site to levels similar to those during former BOR use of the site. Alternative 3 would have slightly more potential for impacts on water quality, with the same impacts on water quantity as in Alternative 2.

c. Air Quality Impacts

Alternative 1

There would be no additional impacts to air quality under Alternative 1. Existing impacts from visitor and employee travel to the park and from ongoing activities at the park (such as from maintenance and nonnative invasive plant treatment) would continue to occur. Because there are no facilities at the park, no calculation of its carbon footprint has been conducted. Existing adverse impacts would continue to include exhaust, evaporative and particulate emissions and would remain undetectable.

Alternative 2

There would be a low level of new short-term and new long-term impacts to air quality. Short-term impacts would be generated as a result of construction, while long-term impacts would be generated from the provision of new employee and visitor facilities at the site.

There would be short-term localized negligible to minor adverse impacts to air quality from rehabilitation actions for both the Herrmann House and Warehouse #5. Impacts would include exhaust, evaporative, and particulate emissions. Use of motorized equipment and vehicles to conduct project work and to transport materials and supplies would contribute to exhaust impacts. Localized degradation of air quality associated with particulates could occur in the vicinity of earth-moving construction, including excavation, filling and grading, and staging. Particulate emissions would be similar to dusty conditions currently experienced on windy days, but would likely be less severe. Gasoline and diesel emissions (exhaust) would increase temporarily during construction activities but would be likely be undetectable outside the project area. The use of treated wood, wood finishes and other chemicals in the project would affect air quality through evaporative emissions. There could also be localized evaporative emissions from periodic weatherizing treatments of the rehabilitated buildings.

Long-term emissions would be generated from increased visitation and increased employee commuting to the site. Although current management of the site includes employees commuting from park headquarters in Hagerman, rehabilitation of the buildings at the site would allow employees who work regularly at Minidoka to choose to live closer to the site. Some of the commuting that now occurs from Hagerman to Minidoka could be reduced and/or replaced by shorter commutes, such as from Eden, Jerome or Twin Falls.

Public visitation is also anticipated to increase with the opening of the new visitor contact station and the placement of highway signs off of nearby roads, including U.S. Highway 93, State Highway 75 and Interstate 84. A rise in visitation from an unknown number of annual visitors to 88,200 annual visitors was projected in the 2008 GMP. The site is approximately 20 miles from Interstate 84, which is a major thoroughfare from Salt Lake City to Boise and vice versa. As noted in Chapter III: Affected Environment, visitation to Hagerman Fossil Beds rose more than 200 percent once education programs were initiated and signs were installed along Interstate 84 and U.S. Highway 30.

Alternative 3

Impacts would be the same as in Alternative 2, however, there would be slightly more impacts from slower paced travel of cars along the rehabilitated historic section of Hunt Road within the park.

Measures to Avoid, Minimize or Mitigate Impacts

Measures in the proposed project (as appropriate to the alternative actions) to minimize impacts to air quality would be as follows:

- If extremely dry or dusty conditions were encountered during excavation, these could be reduced by application of water (Alternative 2).
- The use of local materials and labor sources and large volume materials deliveries would be encouraged (Alternative 2).
- Reduced idling of construction vehicles and equipment (no longer than 15 minutes when not in use) would be encouraged (Alternative 2).
- Biodiesel, rather than traditional diesel fuel would be used where possible.
- Low VOC paints and finishes would be used.

Cumulative Impacts: Over time, there have been a variety of activities at the site, including past construction, farming and ranching activities. These have contributed a variety of negligible to localized moderate adverse impacts on air quality. During construction of the War Relocation Center, severe dust storms were documented. It is unknown whether these were associated with existing site conditions in the 1940s or if they were exacerbated by camp construction. Periodically, current conditions resulting from agricultural operations in the vicinity result in dust storms over U.S. 93/Idaho Highway 75. Overall, however, air quality in southwestern Idaho is good and generally exceeds National Ambient Air Quality Standards (NAAQS).

Future potential impacts to air quality could be moderate to major if implementation of the Confined Animal Feeding Operation (CAFO) occurs. In 2010, the NPS requested an air quality study to determine potential impacts on the park from a planned CAFO nearby that would house approximately 13,000 cows (Gomez-Moreno et al. 2010). According to the report, the proposed CAFO would be located approximately two miles from the entrance to the park. Agricultural livestock facilities similar to this typically produce odorous compounds, including ammonia (NH_3), methane (CH_4), nitrous oxide (N_2O), volatile organic compounds, and particulates. Estimated ambient pollutant concentrations for ammonia, hydrogen sulfide (H_2S) and particulates greater than 10 microns (PM_{10}) were investigated. The results of the study modeling noted that:

- Ammonia (NH_3) would show substantial variability in concentrations during winter and summer days.
- Concentrations of NH_3 estimated to occur at the park could reach as high as 966 ppb (parts per billion).
- For hydrogen sulfide (H_2S), peak concentrations could approach 20 ppb and would be well above the odor threshold of 2 ppb.
- Plume impacts at the park could occur approximately 35 percent of the time in both winter and summer months.
- If implemented the project could result in both NH_3 and H_2S , concentrations modeled for the park that would likely violate the recommendations of an Iowa study for public spaces. The Iowa study identified maximum concentrations for NH_3 of 150ppb and for H_2S of 15 ppb.
- For particulates greater than 10 microns (PM_{10}), estimated peak concentrations were estimated at between 60 to 78 $\mu\text{g}/\text{m}^3$, but average concentrations were modeled at less than 15 $\mu\text{g}/\text{m}^3$, which is below the 24-hr ambient standard levels (150 $\mu\text{g}/\text{m}^3$).

- Overall uncertainties in the NH₃ levels and those predicted for H₂S and PM₁₀ are quite large due to the large uncertainty in current knowledge about pollutant emissions from CAFOs.

The potential ramifications of building this facility so close to the park led the Friends of Minidoka (FOM) to file a petition against Jerome County (whose Planning and Zoning Board and county commissioners authorized a permit for construction of the facility). This case is currently pending (Friends of Minidoka vs. Jerome County 2012).

Currently, construction of this planned CAFO near the park is delayed. There are several organizations and individuals that are seeking alternative means to protect Minidoka NHS and adjacent landowners from anticipated adverse impacts on air, water, soils, real estate values, land use, and visitor experience.

Conclusion: Alternative 1 would contribute no additional adverse effects on air quality. The proposed project under Alternatives 2 and 3 would contribute both short- and long-term adverse impacts to air quality. Cumulative impacts would continue to be small, however future cumulative adverse impacts are hard to predict. Based on the potential for a CAFO to be located near the park, future impacts could be both detectable and could exceed existing standards for nitrate and ammonia. The contribution of cumulative impacts from the action alternatives, however would be small.

d. Vegetation Impacts

Alternative 1

There would be no additional impacts to vegetation in Alternative 1. Existing beneficial impacts, including periodic ongoing removal of nonnative invasive plants would continue. There would also continue to be slight adverse effects from routine mowing of some areas as well as from existing conditions that preclude restoration of native vegetation.

Alternative 2

As in Alternative 1, ongoing beneficial and adverse impacts from periodic removal of nonnative, nonhistoric vegetation and mowing of some areas at the site would continue. In addition, some native vegetation, such as sagebrush and rabbitbrush that has grown in disturbed areas since the War Relocation Center was closed, would be removed. Although mostly nonnative vegetation would be affected, some native species would also be affected. For example, construction of the septic tank and drainfield would require removal of a variety of native and nonnative vegetation. For the most part, however, primarily nonnative invasive vegetation would be impacted by rehabilitation of the Herrmann House and rehabilitation of Warehouse #5 combined with construction of the addition and restroom facility. Overall, there would be both long-term adverse and beneficial impacts from removing native and nonnative vegetation near the Herrmann House (0.01 acres) and visitor contact station (0.16 acres) and replanting the area with native species. Extant native and historic vegetation impacts would be avoided.

Alternative 3

Impacts would be the same as in Alternative 2. In addition, there would be adverse impacts on vegetation adjacent to the current roadway from rehabilitating the road for one-lane public use. To allow for two-foot shoulders, approximately 3,600 square feet would be disturbed on each side of the 1,800-foot (0.34 mile) long road, for an overall disturbance of 1.1 acres, of which approximately 0.08 acres (the 3,600 square feet) would affect areas that have revegetated since

their previous disturbance. As in Alternative 2, great care would be taken to avoid impacts to historic structures and to any native or extant vegetation remaining from the historic period.

Measures to Avoid, Minimize or Mitigate Impacts

Measures in the proposed project (as appropriate to the alternative actions) to minimize impacts to vegetation would be as follows:

- Minimize construction limits and areas to be cleared where possible (Alternatives 2 and 3).
- Reseed and/or revegetate disturbed areas (Alternatives 2 and 3).
- Salvage and replant suitable native plant material (Alternatives 2 and 3).

Cumulative Impacts: There is very little native vegetation remaining at the site. Over its recent history, human impacts at the site have been extensive. These impacts have included removal of most native vegetation to provide room for building construction and farming. There has also been widespread invasion of the site by nonnative plants during and following disturbance. Compared to existing widespread major adverse effects on vegetation, implementation of Alternatives 1-3 would contribute very small additional cumulative adverse impacts, combined with some beneficial impacts. Although additional development and reconstruction of formerly present buildings and structures would continue to occur from and would affect vegetation at the site, most impacts to vegetation would be impacts to nonnative plants. Because it is anticipated that these projects would be combined with periodic or systematic vegetation rehabilitation or restoration, overall adverse effects would be small and would generally contribute to long-term adverse effects but would be combined with long-term beneficial effects.

Conclusion: There would continue to be both small adverse and beneficial effects in Alternative 1 that would also occur in Alternatives 2 and 3. Although there would also be incremental loss of native vegetation in Alternatives 2 and 3, mitigation measures would contribute beneficial effects from restoration of native species (such as by using a native reseeding mix) and adverse effects would primarily affect nonnative species.

e. Wildlife Impacts

Alternative 1

There would be no additional impacts to wildlife from the implementation of Alternative 1. Existing low-level impacts, such as periodic noise and disturbance from operation of mowers and weed-eaters during maintenance and nonnative invasive plant removal, as well as from periodic human disturbance at the site associated with visitor use and interpretation would continue.

Alternative 2

In addition to ongoing impacts from Alternative 1, there would be short-term noise and activity during building rehabilitation and construction. Work on the Herrmann House is anticipated to take approximately four months, while work on the visitor contact station would be completed in approximately eight months. During this time, there would be above ambient noise and activity associated with the proposed work. The intermittent occurrence of large and medium-sized mammals would be reduced during the day by this noise and activity. Other wildlife, such as birds, small mammals and insects would continue to occur but would likely be periodically disturbed by project work and may be less evident. In the evening and on weekends when work would generally cease, wildlife would be expected to return to normal in the project areas.

Staging of machinery and construction materials would also result in some impacts to wildlife habitat, including removal and trampling of vegetation. Despite spill mitigation measures,

potential impacts from inadvertent spills of fuel, oil, hydraulic fluid, antifreeze or other chemicals could also occur. There would also be both temporary and permanent impacts to wildlife habitat from construction activities. Temporary impacts would occur from construction of utility lines and septic tanks because the ground above these would soon revegetate following disturbance. Long-term impacts from loss of habitat would occur from developing the parking and turnaround area near the visitor contact station and developing parking adjacent to the Herrmann House. These permanent modifications at the site would result in minimal loss of habitat because of the existing high level of disturbance in these sites, which have long since lost most of their component native vegetation/wildlife habitat.

Alternative 2 would likely also result in increased visitation to the site from the improvement of facilities. This would result in long-term low to moderate disturbance of wildlife, primarily during the day, when it would have minimal effects.

Although there may be an increase in noise levels during construction, these impacts would be temporary and would not be expected to result in other direct effects on wildlife habitat. In addition, although some alteration or loss of habitat would also occur, the proposed project is would occur in a highly disturbed area, where loss of wildlife habitat occurred many years ago and has not recovered.

Alternative 3

In addition to impacts from Alternative 2, there would be a range of additional short- and long-term adverse effects from rehabilitating Hunt Road through the camp. Although the road would not be widened, areas alongside the road where vegetation has established would be reestablished as road shoulder, thereby losing an incremental amount of vegetation. The road would be rehabilitated as a one-lane road, approximately 25 feet wide and 1,800 feet long and would continue to affect approximately 1.03 acres. Very narrow shoulders (2-feet) would line the road, affecting another 3,600 square feet or 0.08 acres. Construction impacts would also continue for a longer duration than in Alternative 2, but would have similar levels of noise and disturbance.

Measures to Avoid, Minimize or Mitigate Impacts

Measures in the proposed project (as appropriate to the alternative actions) to minimize impacts to wildlife would be as follows:

- Schedule construction to minimize impacts during spring nesting periods.
- Minimize the degree of habitat removal (vegetation clearing) by clearly delineating construction limits.

Cumulative Impacts: Little evidence of most native wildlife exists at the site. Intermittent signs of rabbits, coyotes, and other mid-sized mammals are found, however there are abundant sightings and evidence of voles and birds. Over time, the once native sagebrush steppe habitat at the site has been dramatically modified and exists now only in remnants. At the same time, importation of water near the site (North Side Main Canal) has resulted in bringing an abundance of species that would not normally be found in such an arid area. Over time, the site has gone from a quiet, fairly undisturbed habitat to a noisy highly modified area and back to a disturbed, mostly quiet place, where existing noise and disturbance to wildlife comes primarily from passing vehicles, overhead aircraft and nearby farming activities as well as from periodic visitor use of the site.

There would be no additional cumulative impacts to wildlife from the implementation of Alternative 1. In Alternatives 2 and 3, although there would be slight modifications to existing native and nonnative vegetation (wildlife habitat) in the area of building rehabilitation / construction (and in the case of Alternative 3 road rehabilitation) as well as temporary disturbance from noise and activity during construction, compared to effects from major changes

in use of the site, there would be few cumulative adverse impacts on wildlife. As noted above, however, long-term impacts would come from a notable increase in visitation that would bring noise and disturbance at the site to a higher level overall during the day and a return to natural quiet at night.

Past, present and reasonably foreseeable future projects are likely to include small inputs of short-term noise and activity and small additional adverse impacts on the vegetation in the area that comprises wildlife habitat. Associated with these adverse effects would likely be additional restoration of both native and historic vegetation at the site, which would contribute to long-term beneficial effects on wildlife.

Conclusion: Overall impacts to wildlife would be short- and long-term. While these would increase noise and disturbance at the site during the day, there would continue to be a respite from these activities at night when wildlife are most active. Because of the new building shelter (Herrmann House and visitor contact station), there would also be new opportunities for both employees and visitors to conduct some activities indoors, where these would not disturb wildlife.

f. Archeological Resources, Historic Structures and Cultural Landscape Impacts

Alternative 1

There would be no additional impacts to archeological resources, historic structures or cultural landscapes from the implementation of Alternative 1. Ongoing impacts could include some ongoing deterioration of historic structures from the need to complete preservation maintenance actions. Many remnant historic structures suffered damage or loss during delayed preservation maintenance as a result of neglect for more than 60 years following the historic period. Since the park's establishment, numerous actions have been undertaken to stabilize historic structures and buildings.

The Cultural Landscape Inventory (CLI) described the overall condition of the site as “poor” and noted that the majority of remaining historic resources show clear evidence of major disturbance and rapid deterioration by natural and/or human forces. It recommended immediate corrective actions to protect and preserve the remaining historical values (NPS 2008:89). Since the CLI was prepared, a variety of rehabilitation efforts have been undertaken, such as stabilization of the root cellar and fire station, however, other work is needed. Ongoing specific actions under Alternative 1 would continue to be undertaken pending project funding and approved preservation maintenance proposals. Work would continue to have *no adverse effect* on historic resources, including archeological sites, historic structures and buildings. Long-term beneficial impacts would continue to occur from ongoing preservation maintenance of some site features and from additional investigation into the significance of and preservation of other extant site features.

The existing historic lavatory would remain as unprogrammed space. There are no current plans for rehabilitation of this structure.

Without rehabilitation, Warehouse #5 would continue to deteriorate and eventually, the building could partially or locally collapse if additional stabilization work is not undertaken (FFA 2015). The Herrmann House would also continue to deteriorate. Other impacts at the site would also remain, including informal parking in the large gravel lot between Warehouse #6 and the historic lavatory.

Alternative 2

Prehistoric and Historic Archeological Resources

There is no current indication that this site is likely to yield prehistoric information or sites (FFA 2015: 8), however potential impacts to historic and/or prehistoric archeological resources are possible if these are inadvertently discovered in previously unidentified areas through excavation. Historic archeological resources are also a contributing characteristic of the cultural landscape.

One initial reconnaissance survey and several additional investigative archeological surveys have been conducted in the park. These include a survey done before the park was expanded (Burton and Farrell 2001), several surveys of specific camp resources (Burton et al. 2003), including new areas that were added (Farm-in-a-Day [Burton and Farrell 2006], Robison property [Burton, trip report 2009], the camp dump [Burton 2005], and Block 22 [Burton, trip report 2009]). As a result, historic archeological resources within the area of potential effects (APE) have been documented. Extant features from the War Relocation Center period are considered both as historic archeological resources and as contributing elements to the area cultural landscape. Historic artifacts (historic archeological resources) also date from the Farm-in-a-Day period. While the Minidoka War Relocation Center is listed on the National Register of Historic Places, the Herrmann House/Farm-in-a-Day is considered eligible but has not been nominated. Therefore, rehabilitation of both structures is being done in cooperation with the Idaho State Historic Preservation Office and in adherence to the Secretary of the Interior's Standards for Rehabilitation. Any addition excavation within the project area would be monitored by an archeologist, as called for in the archeological surveys that have occurred at the site. If artifacts were found, mitigation measures noted below would be followed and this would ensure that there would be *no adverse effect* on archeological resources, historic structures and/or the cultural landscape.

Other Cultural Landscape Characteristics

There would be impacts to the following contributing cultural landscape characteristics: buildings and structures and circulation. There would be no effect on the following character-defining cultural landscape characteristics: natural systems and features, spatial organization/cluster arrangement, cultural traditions or vegetation.

Buildings and Structures

The rehabilitation would affect two historic buildings. The Herrmann House would be rehabilitated with interior and exterior modifications for adaptive use as an administrative building and temporary visitor exhibit. Warehouse #5 would be rehabilitated to showcase its historic interior, while its exterior would be rehabilitated to show its appearance during the historic period and an additional bay would be reconstructed to connect to the historic sections. In addition, a new bay, to house restrooms, would be constructed. Between the two new bays would be unconditioned space, a breezeway consisting of the remaining two bays. Because of the mix of historic and nonhistoric portions, the finishes (outward appearance) of these would be distinguished from one another to meet the Secretary of the Interior's Standards for Rehabilitation, thereby minimizing the potential that the additions would be mistaken for the historic portion, a long-term beneficial effect.

Overall, preservation, rehabilitation and restoration work on both buildings would be conducted to comply with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. Proposed work is intended to have *no adverse effect* on the character-defining features of the buildings, including their walls, configuration, historic elements, circulation and setting. Additional specific actions associated with the rehabilitation of each building and their effects are described below.

Herrmann House (Farm-in-a-Day House)

A range of short- and long-term adverse and beneficial effects would occur from preservation maintenance and rehabilitation actions. These include replacement-in-kind or upgraded replacement-in-kind of deteriorated features. While features, such as the foundation would be replaced in kind, upgraded replacement-in-kind would be used for features such as the interior wallboard, which is constructed of a flammable material that does not meet current building code requirements. For some features, such as the kitchen cabinetry, removal, refinishing and reinstallation would occur.

Depending on the preservation treatment, there would be a range of effects on the components of the historic building. Where features were replaced in-kind, there would be long-term loss of historic fabric but the same materials used in the original construction would be used, thus extending the life of the structure. Where features resulted in an upgraded replacement-in-kind, there would also be long-term loss of historic fabric; however replacements would be selected to retain the essential characteristics of the materials originally used but new materials would meet current energy requirements and building codes. Where materials were removed and refinished, historic fabric would be retained, while finishes would be improved to extend their life. In some cases, a series of these actions would be applied to the same historic elements (e.g. lighting fixtures would be refinished with new wiring and bulbs, but would be retained).

Replacement-in-kind would be applied to the following features of the Herrmann House:

- Foundation;
- Some exterior wood sheathing (deteriorated pieces of wood siding would be replaced in-kind, while intact pieces would be retained);
- Roofing; and
- Gutters/Downspouts.

Upgraded replacement-in-kind would be applied to the following features of the Herrmann House:

- Interior Celotex wallboard would be replaced.
- Lighting fixtures would be rewired and new fixtures would be added where needed for office spaces.
- Window coverings (to provide double-paned energy efficient windows)
- Plumbing would be replaced
- Wiring would be replaced
- Ductwork would be replaced (existing ductwork has been adversely affected by rodent infestation)
- Tile/Linoleum flooring would be replaced.
- Heating/Cooling system: There would be a heat pump instead of floor registers.
- Insulation: New insulation would be replaced to meet heating/cooling requirements.
- Septic tank and drainfield: New facilities would be constructed, including identification of an alternate drainfield location.

Removal and refinishing would be applied to the following features of the Herrmann House:

- Lighting fixtures;
- Kitchen cabinetry;
- Wood flooring; and
- Some exterior wood sheathing.

There would also be loss of some historic elements to allow for accessibility improvements. Among these would be the bathtub/shower (to provide adequate space for a wheelchair turnaround in the bathroom); cabinetry under the kitchen sink (to provide wheelchair access to the sink), etc. Similarly there would be nonhistoric additions to provide for accessibility. For example, a ramp would be added to the back entrance of the building to provide wheeled access to the raised doorway from the parking area.

In addition, rehabilitation of the house would change the function of the building, resulting in a long-term minor adverse effect, since there would be no change in the physical layout of the building and some of the changes that would be made are ones that would have to be made to meet current building codes for occupation, such as accessible ramp and bathroom upgrades. New features, such as communications, data and security systems would also be installed and would be located in an area, such as a closet, that would not affect the outward appearance of the interior of the building. Heating and cooling needs would be met outside the structure through the placement of a heat pump or similar unit on a concrete pad, which would be concealed to minimize adverse effects.

Overall improvements to the Herrmann House would have *no adverse effect* on the eligibility of the structure for the National Register of Historic Places.

Warehouse #5 (original Motor Repair and Tire Shop)

As with the Herrmann House, a range of short- and long-term adverse and beneficial effects would occur from preservation maintenance and rehabilitation actions. These include replacement-in-kind, upgraded replacement-in-kind, and removal and refinishing or reconstruction of deteriorated features, as well as adding new features where needed to accommodate revised building code requirements or the need to make the building energy efficient and sustainable.

The following were among the guidelines for rehabilitation of the warehouse:

- Reestablish the volume and form of the historic structure.
- Reconstruct the original wood garage doors to slide into the closed position over new glass openings at the existing openings.
- Maintain historic fenestration on the existing portion of the warehouse.
- Maintain a clear distinction between the historic and new portions of the building.
- Construct the entrance within the new portion of the building. Exhibits, including of the historic interior, would be in the old portion.
- Provide restrooms on the west end, with at least the family restroom open to the outside to provide shoulder season use.
- Ensure that structural interventions to meet current code requirements are compatible but distinct (FFA 2015: 18).

As a result, the following categories of actions have been identified and would have varying effects on the retention or replacement of historic fabric and the addition of new elements.

Replacement-in-kind would be applied to the following features of Warehouse #5:

- Window and door openings: These would be in their existing historic locations and would use materials similar to those used historically. Former locations of windows and doors would also be restored. The materials would be similar in shape and design.
- Wall framing: Heavy timber beams and columns with stud infill walls at the perimeter are present. The 8 x 7 inch timber columns are spaced on a 16 x 16 foot grid over the footprint of the building. The wall framing sits atop sill plates which currently have

- minimal connection to the foundation due to their current deteriorated condition. In several places, multiple sill plates and wood blocks have been added to address ongoing rot issues in the sills and at the base of studs. This framing would be reconnected to the foundation and the 16 x 16 grid pattern of the timber columns maintained in the historic portion and mimicked in the new portion. Where the stud walls and columns have not deteriorated they would be retained. Deteriorated portions would be replaced in-kind.
- **Roof framing:** The roof is supported by 8 x 14 inch timber beams that span in the north-south direction between the building columns. The roofs joists span 16 feet between beam lines and consist of 2 x 10 inch boards at 24 inches on center. Where rotted, these would be fixed and/or replaced.
 - **Chimney:** The nonhistoric chimney may be replaced with one that replicates its historic appearance and a coal potbelly stove could be added.

Upgraded replacement-in-kind would be applied to the following features of Warehouse #5:

- **Foundation Stemwall/Footing:** The existing three-sided perimeter stemwall/footing would be replaced. Although the interior square footage of the warehouse would remain the same, the foundation and walls would be slightly larger to accommodate insulation between the new (exterior) and historic (interior) portions.
- **Slab:** The existing floor of the warehouse consists of a four-inch slab on grade and is unlikely to be reinforced with rebar. This same foundation configuration extends to the west where an additional four bays to this building once existed. Because the visible portions of the concrete foundation and slab have degraded substantially over time and because the foundation is both too small and too shallow to conform to current code requirements, it would be deepened and reinforced. It is likely that this would require lifting the existing building off of its foundation to replace the slab.



Figure 23: Isolated Roof Leaks have Affected Roof Joists and Timber Beams

- **Roof Deck:** A line of wood bridging occurs at approximately mid span of the roof joists. The roof joists at the center bay of the building are blocked up off a supporting beam to maintain the roof slope. Roof sheathing consists of 1 x 8 inch boards oriented perpendicular to the existing joists. Where the existing roof framing (timbers, joists, and sheathing) has been subjected to ongoing roof/wall leaks and compromised by rot, it would be replaced. The roof structure would be tied into the new exterior walls and the steel frame (lateral bracing) – see below.

- **Roof Finish (top):** Because the roof is not visible from anywhere on site, it would be upgraded with materials that would provide a long-life and which have low maintenance needs.
- **Siding:** Existing nonhistoric corrugated metal siding would be removed and new siding would be adhered. To mimic its historic appearance, the new siding would consist of Derbigum with vertical battens at 24 inches on center. Originally the siding would have been tarpaper (thinner material/not fire rated) with battens at approximately the same distance (duplicating the pattern of the roof truss).
- **Window coverings:** These would be upgraded with double-paned energy efficient windows. To ensure efficient heating and cooling systems in the building, the windows would not be operable and would look like the historic windows.



Figure 24: Exposed Area of Warehouse #5 Slab, Showing Deterioration and Former Tank Location

Removal and refinishing would be applied to the following features of Warehouse #5:

- The existing garage bay doors (2 sets/4-doors) would be removed and reconstructed, retaining as much original fabric as possible.



Figure 25: Extensive Rot at Base of Columns and Sill Plates

Besides the addition and west bay restroom building, there would be several new features added to the building:

- There would be a new entry vestibule on the west side of the building, replacing the nonhistoric west wall.
- A new lateral framing system would be added to the building. The current lateral force resisting system (roof diaphragm, shear walls, foundations, etc.) is insufficient. A full seismic upgrade to current code requirements would be required to allow for public use (occupancy) of the building.
- Although the bay doors would look similar to their historic appearance (in same location and function), they would not be open to the outside in the same way since glass would cover their openings.
- Wall framing: There would be a new perimeter wall constructed which would go outside of the historic and insulation would be added between the new and old portions of the wall. As a result the outside wall would be slightly larger than the existing slab/foundation.
- Lighting fixtures: There would be new wiring and new lighting fixtures.
- Plumbing: Plumbing would be added to support the new public and employee restrooms and water bottle filling station.
- Wiring: Current wiring is exposed and this would be replaced and concealed (in conduit).
- Insulation: New insulation would be added between the new and old wall and would meet current building codes including weather tightness to provide a more sustainable building.
- A new fire suppression system, including piping and sprinkler heads would be added and would likely be visible in the interior spaces of the building.
- Heating and cooling system: The heating/cooling system would be replaced with a heat pump, which would include an outside component and a circulation system above the ceiling of the new bay (over the office). Where possible new ductwork would be concealed. Elsewhere it would be visible as a new element. Although the exterior mechanical unit would be screened, it and the ductwork would be new elements that

would adversely affect the historic structure, including as a contributing element to the cultural landscape. Formerly, a wood stove provided the only heating and cooling likely took place by opening the bay doors.

- Electric Power: Provision of electrical power to the building would be modified and would likely include a new transformer near the building as well as some additional underground, rather than overhead powerlines. It is also likely that solar panels would be added to the roof of the new portion of the building.
- In front of the building, the interpretive plaza and parking area and turnaround would add another new element to the landscape (see *Circulation* below).

As for the Herrmann House, depending on the preservation treatment of the various elements of Warehouse #5, there would be a range of effects on the components of the historic building. Where features were replaced in-kind, there would be long-term loss of historic fabric but the same materials used in the original construction would be used, thus extending the life of the structure. As noted above, this would be true of some of the wall framing, roof deck and window and door openings.

Where features resulted in an upgraded replacement-in-kind, there would also be long-term loss of historic fabric; however replacements would be selected to retain the essential characteristics of the materials originally used but new materials would meet current energy requirements and building codes. In Warehouse #5, this would be applied to much of the current structure, including utility elements.

Where materials were removed and refinished, historic fabric would be retained, while finishes would be improved to extend their life. In some cases, a series of these actions would be applied to the same historic elements (e.g. the framing timbers would be retained, but refinished to eliminate rot where they connect with the floor slab).

Where entirely new features were added, these would be done in a manner compatible with the historic structure, where visible and where completely new features are added, these would be distinguished from the historic portions so as not to convey the impression that they were part of the original design.

Warehouse #9 (Refrigerated Warehouse)

A portion of the Warehouse #9 concrete pad would be reconstructed, and a new fence would be constructed to encircle it, mimicking the size and shape of the former warehouse. Inside the fence on the new concrete pad would be a small water treatment building (approximately 20 x 20 feet or 400 square feet). A new fire suppression water storage tank (30,000 gallons) would also sit on the new portion of the warehouse slab. To the extent possible, as much of the existing concrete pad as possible would be retained.

Because the screening is not part of the current project, there would likely be a short period of time between the reconstruction of the new portion of the slab (including placement of the water tank and treatment building) and the construction of the screening fence. The screening fence would also be slightly more complicated than just constructing a fence. This is because it is likely that the design of the fence would also need to include window and bay door locations and to mimic outside finishes, similar to Warehouse #5 and the other warehouses that existed in the same area. This would require a fence approximately 10-feet high and interior bracing that would withstand the high winds at the site. In addition, the fence would need footings that would strap it to the new and old portions of the warehouse slab. Therefore, combined, there would be both short-term adverse and long-term beneficial effects. Short-term adverse effects would be attributed to the interim period without screening of the new elements in the landscape, while

long-term beneficial effects would result from recreating the mass and form of another of the warehouses in the area.

Removal of Nonhistoric Buildings: 1) Single Family Residence on the Foundation of Warehouse #6 (Steward's Storage Warehouse), 2) Duplex Residence on the Foundation of Warehouse #9 (Refrigerated Warehouse) and 3) nonhistoric house southeast of Warehouse #5.

There would be short-term adverse and long-term beneficial effects from removal of the three nonhistoric buildings currently located in the warehouse area. Short-term adverse effects would continue to occur from the retention of these buildings until they were removed because they were not part of the historic landscape. Adverse effects would also continue until restoration of their footprints occurred, while long-term beneficial effects would occur from improving visitor understanding of the composition of the site after their removal. As noted above, the Warehouse #9 slab would be modified and would eventually contain a fenced water treatment building and 30,000 gallon fire water storage tank.

Circulation

There would be modest changes in circulation from the implementation of Alternative 2.

Entry: At the site entrance, long-standing adverse impacts to circulation would continue, with visitors entering the area near the Guard Tower, but then instead of continuing down the historic alignment of Hunt Road, they would continue to the warehouse area entrance on the new alignment of Hunt Road to access the proposed visitor contact station. In the interim situation, when the Herrmann House was used as the visitor contact station, visitors would access the facility either via the site loop trail from the Guard Tower area through the Japanese garden into the administration area, then via a cut-off to the Herrmann House. Alternatively visitors could continue to access the Herrmann House via the warehouse area and then onto the site loop trail to the Herrmann House.

Parking: Visitor and employee parking would be located on the other side of Warehouse #6. Between Warehouse #5 and #6 would be a plaza/visitor drop-off zone, which would therefore include a roadway between the two buildings. Rather than being connected to other parts of the site, the roadway would be part of the turnaround back to the parking area and Hunt Road (Figure 16). The gravel-surfaced parking area would be located between Warehouse pads #4 and #6. Warehouse #4 was formerly used for storage. As a result, there would be some adverse effects on historic circulation patterns but the parking and turnaround would not affect historic structures.

Loop Trail: As part of the rehabilitation of Warehouse #5, the trail segment leading alongside the visitor contact station would be constructed. As with other portions of the trail, the surface would be delineated and be covered with crushed rock similar to other trail segments elsewhere at the site. Because no historic rock lining exists in this area, this section of trail, however, would not be lined. This spur would link to the existing trail segments to the historic Root Cellar and to Block 22.

Alternative 3

Buildings and Structures

Impacts associated with buildings and structures would be similar to Alternative 2, however because the rehabilitation would encompass the entire footprint of the former warehouse, there would be greater long-term beneficial effects and fewer adverse effects from retaining a breezeway between two structures, as in Alternative 2. Overall modifications however would be similar, except that instead of a breezeway the building would be fully enclosed with a roof and walls.

Circulation

As in Alternative 2, there would be changes in circulation from the implementation of Alternative 2. Some of these would be modest, while the return to using the historic alignment of Hunt Road would be more substantial.

Parking: As in Alternative 2, visitor and employee parking would be located on the other side of Warehouse #6 and between Warehouse #5 and #6 would be a plaza/visitor drop-off zone, forming a roadway between the two buildings, similar to the historic period (Figure 16). However, rather than being connected to other parts of the site, the roadway would be part of the turnaround. In Alternative 3, unlike Alternative 2, the turnaround would skirt Warehouses #2 and #3 before returning to the entrance driveway and then to the new alignment of Hunt Road (Figure 16). As in Alternative 2, the gravel-surfaced parking area would be located between Warehouse pads #4 and #6. As a result, there would be some adverse effects on historic circulation patterns but the parking and turnaround would not affect historic structures. The roadway circulating through the parking area would be approximately 1,500 linear feet in Alternative 3, slightly longer than the 2,200 linear feet in Alternative 2. In addition, the road would not circulate back through the parking area so visitors would likely have an easier time leaving the area, since they would not have to wait for cars entering and leaving parking spaces.

Loop Trail: Because the historic alignment of Hunt Road would be rehabilitated in this alternative, the portion of the site loop trail that was constructed in the roadway between the Herrmann House and Warehouse #5 would need to be reconstructed. This portion is approximately 792 feet or 0.15 miles long. It was originally planned (in the Trail and Fence Environmental Assessment/Finding of No Significant Impact and subsequent construction documents) to be constructed alongside the road near the historic gas station foundation but because the project would have incurred additional costs to construct the trail over a large area of fill and/or to install a short trail bridge, the alignment of the trail was moved into the road. Upon construction, this new portion of the trail would be delineated and covered with crushed rock similar to other trail segments elsewhere at the site. Because no historic rock lining exists in this area, this section of trail, would also remain unlined. This spur would link to the existing trail segments to the historic Root Cellar and to Block 22 as well as up to Warehouse #5, as the visitor contact station.

In addition to the modest changes related to parking and the loop trail, there would be major changes in circulation from the reestablishment of the historic alignment of Hunt Road, a long-term beneficial effect on the cultural landscape.

Road: Reuse of the historic alignment of Hunt Road would require rehabilitation of this one-lane roadway (approximately 1,800 feet or 0.34 miles long and 25 feet wide) through the camp.

Rehabilitation of the roadway would require improving the surface for regular traffic en route to the visitor contact station. The rehabilitated roadway would begin near the historic entrance, at the intersection with Hunt Road and S1400E across from the Honor Roll area, passing through the former administration area, before veering toward the site of the former water tower, (Herrmann House), and fire station and then toward the Warehouse Area. One-foot shoulders would be constructed of crushed rock. It would require approximately 1.03 acres of asphalt concrete pavement over a crushed rock base, including pre-work to level and grade the area.

Although this historic alignment of Hunt Road currently exists, it has not been used as a public roadway for many years. Because of the modifications to the roadway and the proximity of the site loop trail, reconstructing the roadway could temporarily affect the loop trail, which is

constructed on its historic alignment with sections of rock lining that remained from the historic period in some areas.

Compared to the historic gravel surfacing of the roadway, asphalt concrete would be considered upgraded replacement-in-kind. Although the surface treatment would be different than that used historically, the alignment would be the same and modifications would be designed to have *no adverse effect* on this historic structure/cultural landscape.

Measures to Avoid, Minimize or Mitigate Impacts to Archeological Resources, Historic Structures and Cultural Landscapes

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 archeological resources, historic structures and cultural landscapes:

- Ground disturbance during construction would be monitored by an archeologist.
- If previously unknown historic or prehistoric archeological resources are found, these would be evaluated according to National Register of Historic Places criteria eligibility.
- Work would be stopped in the area of identification and nearby areas if previously unknown archeological resources are discovered. Work would cease until the find is evaluated and action taken to avoid or mitigate the impact (as directed by the onsite archeologist). If it is necessary to stop work due to archeological resources discovery, work could continue in unaffected areas.
- Impacts to previously unknown archeological site(s) would be avoided by modifying project implementation 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 an archeologist).
- Historic landscaping, including trees and shrubs, would be preserved.
- Documentation of rehabilitation would occur through Historic American Buildings Survey (HABS) recordkeeping.

Cumulative Impacts: Historic archeological resources at Minidoka have primarily been adversely affected by major changes to the site since War Relocation Center closure in 1945. Among these changes include demolition of most buildings and structures and conversion of the area to homesteading and farming. Portions of the site owned by other federal agencies (BOR and BLM) 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 during Idaho's centennial (1990) and another small part of the site was designated a national monument (2001). Resources in other parts of the site continued to be affected by ongoing use for farming until Conservation Fund purchase of the Herrmann property in 2006 and transfer of the BLM and BOR properties to the NPS in 2008. Even now, most of the nearly 34,000 acre former site remains privately owned and is used for irrigated farming and other agricultural activities.

Alternative 1 would continue to contribute a small degree of cumulative adverse effects from delayed implementation of site rehabilitation associated with a continuing low level of preservation maintenance funding. Over time, future preservation maintenance would have long-

term beneficial effects as funding is secured and rehabilitation projects are completed. Alternative 2 impacts would hasten long-term beneficial impacts on preservation of site features associated with the trail rehabilitation / construction project. There would also be a range of short-term minor to moderate adverse and long-term beneficial impacts from activities to implement planned rehabilitation, restoration and visitor services projects. Cumulative adverse and beneficial effects have occurred from construction of the entrance sign, reconstruction of the guard tower, construction of the site loop trail and preservation maintenance and stabilization of the Fire Station and root cellar. Additional cumulative adverse and beneficial effects would occur under Alternatives 2 and 3 from proposed rehabilitation / adaptive reuse of a warehouse as a visitor contact station and adaptive reuse of the Herrmann House as an administrative facility. Additional beneficial impacts would occur under Alternative 3 from taking full advantage of the footprint of Warehouse #5 to construct one, rather than two connected buildings and from proposed reuse of the administrative road (historic alignment of Hunt Road) through the camp to draw people into the site.

Conclusion: Alternatives 1, 2 and 3 would have no adverse effect on archeological resources, historic structures or cultural landscapes contributing to the Minidoka War Relocation Center or Farm-in-a-Day historic periods.

g. Visitor Experience Impacts

1. Visitor Access Impacts

Alternative 1

There would be no additional impacts on visitor access and transportation from the implementation of Alternative 1. Visitors would continue to be able to access the site informally at the entrance (near the reconstructed guard tower and in the warehouse area. There would also continue to be formal access to the site along the loop trail, where visitors could continue to enjoy a series of wayside exhibits that convey a better understanding of the historic significance of the site.

Because there would continue to be no shelter during inclement weather, some visitors would likely continue to be deterred from accessing the site in winter, and during extreme heat or high winds. In addition, there would continue to be no signs directing visitors to the site from Interstate 84 or from U.S. 93/Idaho State Highway 75. As a result, some visitors would continue to have difficulty finding the site.

The newly reconstructed guard tower and site identification monument substantially strengthen the sense of gateway and introduction to the site (FFA 2015). The presence of these facilities at the entrance also results in visitors stopping and parking at this site, where the site loop trail is also evident. Originally, everyone entering the Minidoka War Relocation Center had to stop at this gate to be checked and approved before going any further. The experience of entering the site this way, stopping at the guard tower is reminiscent of this entry experience. Nonetheless, visitors continue to have difficulty understanding the site features and their arrangement as well as how they appeared during the historic period. Parking at the site would continue to be at random, not consistent with historic landscape preservation and confusing to pedestrians and drivers. Minimal understanding of historic resources would continue to affect the visitor experience of those who cannot take or choose not to walk the site loop trail.

Alternative 2

There would be long-term beneficial impacts on visitor access from the implementation of Alternative 2. Visitors would find a rehabilitated warehouse and Farm-in-a-Day house with new

visitor use opportunities. Parking and access to these would be clearly delineated and there would be signs to the site from Interstate 84 and U.S. 93/Idaho State Highway 75, as well as from Idaho State Highway 25.

Initially the Herrmann House would provide a welcoming space for visitors to the site. Later, when the warehouse rehabilitation is complete, the new visitor contact station would provide orientation, information, interpretation and shelter.

Visitors would likely continue to have the experience of stopping at the guard tower at the entrance before continuing on to the visitor contact station. Because this transition is not part of the current project, sequencing this experience would need to be facilitated by the park, perhaps with a sign that directed visitors to continue down Hunt Road towards the visitor contact station. Some ideas that have been suggested include getting a pass at the gate before being directed to the visitor contact station, where parking and a turnaround would be available. Instead of the current small number of undesignated spaces, there would be delineated parking for large and small vehicles, including accessible spaces, and a turnaround.

Traffic calming measures, such as working with the county to improve cross-walks across Hunt Road and to slow speeds of traffic on the road through the site would, if implemented, also improve visitor experience.

Alternative 2 would improve the ability of visitors to find their way, orient to the site and understand its historic significance and how it relates to their lives today. Locating directional signage to clearly identified parking areas and pathways would improve the overall visitor experience. All visitors would find a site with improved accessibility, better information and a wide range of interpretive messages that would be designed to appeal to the wide range of visitors accessing the site.

Alternative 3

Impacts would be similar to Alternative 2, however, instead of visitors entering the site and continuing down the current alignment of Hunt Road, they would be directed onto the historic alignment of Hunt Road, through the administration area, and on toward the warehouse area, where they could park near the visitor contact station. This reconstructed road would provide one-way access through the site. Because the historic alignment is adjacent to the site loop trail (as it was in the past), there would likely be some interaction between those walking and those in vehicles. Depending on the number of vehicles traveling the rehabilitated roadway and whether they tried to stop before reaching the parking, there could be some delays related to this new access as visitors accessed site parking and/or stopped in the roadway, such as in front of trail exhibits or at the Herrmann House before reaching the new visitor contact station parking area. Although this historic alignment of Hunt Road currently exists, it has not been used as a public roadway for many years, therefore modifications to the roadway would require its reconstruction and because of the proximity of the site loop trail, reconstructing the roadway could temporarily affect the loop trail, which is constructed on its historic alignment with sections of rock lining that remained from the historic period in some areas. As a result, visitor access to the site would continue to be via the existing new alignment of Hunt Road during construction and portions of the site loop trail would be temporarily inaccessible during construction, which would be anticipated to take approximately eight months.

As noted under cultural resources, a visitor parking area in the warehouse area would be constructed, with road access from both the historic and current alignments of Hunt Road. Because the parking access road would not circulate back through the parking area (see the description of the parking area in Cultural Resources impacts), visitors would have an easier time

leaving the area, since they would not have to wait for cars pulling into and out of parking spaces. This would be of particular benefit during busy times.

2. Visitor Use Opportunities and Interpretation and Education Impacts

Alternative 1

There would be no additional visitor use opportunities from the implementation of Alternative 1. Visitors would continue to primarily experience the entry area and would gather a basic understanding of the camp location from the extant rock structures, interpretive waysides, and the guard tower, as well as by walking the site loop trail. Those visitors not walking part or all of the trail could also decide to drive down Hunt Road toward Warehouse #5 and the Root Cellar. Depending on their desire for exploration or whether they had stopped for information in the visitor center at Hagerman Fossil Beds, some visitors would also seek out the Block 22 mess hall and barrack and view it as an outdoor exhibit. Without a visitor contact station, visitors would primarily continue to obtain information at Hagerman, from the internet, or would (more commonly) lack orientation information about the site. There is very little seating or shelter currently on site. Temporary restrooms are provided at the entrance and near Warehouse #5.

Through its series of wayside exhibits and route that circumnavigates a portion of the former Minidoka War Relocation Center, the site loop trail provides enhanced visitor understanding of the significance of the incarcerated experience during World War II, including its relevance to modern day life. Outdoor waysides also provide a better understanding of Idaho homesteading and the unique Farm-In-A-Day era. Because the trail is also accessible, it has opened up additional opportunities for visitors with limited mobility to explore the site, including many former incarcerated and/or their families who visit during pilgrimage events. The trail is also short and flat enough to appeal to and be accomplished by a wide range of visitors.

Alternative 2

Compared to Alternative 1, there would be a wider range of visitor use opportunities at the historic site. Initially, rehabilitation of the Herrmann House would provide a place for visitors to go to obtain orientation and interpretive information about the park. The Herrmann House living room would also temporarily provide shelter for visitors escaping winter cold temperatures and high winds and summer heat. Once the new visitor contact station was in operation, it would provide a wider range of visitor use opportunities, including easily identifiable parking and gathering space, public accessible restrooms, outdoor exhibits and a plaza, an indoor reception area with orientation and information, including a staffed information desk, opportunities to take advantage of daily activities and events, and a range of historic and modern exhibits in the rehabilitated original building.

The building would provide:

- A place to learn about the site and experiences of camp occupants;
- An understanding of the historic interior character of the original warehouse;
- Demonstration space;
- A kid's corner;
- A place to listen to the recorded stories of incarcerated; and
- A place to watch the site overview film, and/or to conduct short interpretive programs.

The breezeway area would accommodate groups gathering before exploring nearby areas, such as the site loop trail, staging for school group interpretive programs, and informal resting space.

Exhibit cases would be used for original artifacts. Although the building can be thermally improved, due to its large volume and construction, it will probably never be as tightly sealed and environmentally controlled as would be needed for the long-term display of artifacts. These passive, conservation grade display cases could protect objects for a short period, but it is likely that active conservation grade display cases would protect original artifacts for short- or long-term display.

Unlike Alternative 1, rehabilitation of the warehouse, adding onto it and constructing the restroom building on the former Warehouse #5 pad location would begin to give visitors an understanding of the scale and magnitude of operations at the site. This would be magnified by the use of the Warehouse #9 pad for the water treatment system, which would be housed within a fence that replicated some of the mass and size of that warehouse. This juxtaposition of buildings would give visitors standing between the building and the fence a sense of what the other warehouse pads on the site contained. If visitors continued down to Block 22 and/or viewed the site orientation map showing the layout of the area in a crescent along the North Side Main Canal, this understanding would be improved.

Alternative 3

The range of visitor use opportunities identified in Alternative 2 would also be available in Alternative 3. Alternative 3, however, would differ in that visitors would find a rehabilitated building that addressed the widest range of visitor needs at the site, including for orientation, information, shelter, and interpretation. Unlike Alternative 2, which would give visitors a general understanding of site conditions, constructing a building that replicates the full size and configuration of former Warehouse #5 on the site, combined with the fencing around the Warehouse #9 pad to replicate the mass and form of that building would begin to give visitors a better understanding of the scale and magnitude of operations at the Minidoka War Relocation Center.

3. Visitor and Employee Safety Impacts

Alternative 1

There would be no additional impacts on visitor and employee safety from the implementation of Alternative 1. Existing impacts, which are many and varied, however, would continue.

Among the existing hazards are related to crossing Hunt Road at an unmarked location near the entrance to the historic site to get to the Honor Roll garden across the way. There is limited sight distance approaching the area because Hunt Road curves just before the entrance. Until speed limits were reduced along Hunt Road, potential safety hazards from crossing the road near the entrance to the Honor Roll garden and from the warehouse area to the former swimming hole area would remain. There would be fewer hazards associated with the swimming hole crosswalk because of greater sight distance in both directions. Records indicate a vehicular accident occurred in 2005 at the entrance, when a driver sped through the entrance area and collided with a historic structure. Another reported accident occurred in 2009 when a vehicle ran into the historic root cellar – a building constructed by incarcerated during WWII.

There would also continue to be potential impacts from minor safety hazards located throughout the site if visitors decided to explore further on their own or for employees engaged in site clean-up or maintenance. Over time, these site clean-up hazards have diminished from repeated efforts by park staff to assess the historic significance of and then to remove or alleviate hazards.

Existing impacts from rodent infestation at the Herrmann House would also continue. The building, long ill-maintained has, in recent years, allowed rodents to enter and reside within the

walls and in the building. Similarly, Warehouse #5 formerly hosted roosting pigeons in its rafters. There is also evidence of rodent usage within the building.

Because there would continue to be no shelter provided at the site for visitors and/or staff, staff and visitors would continue to encounter harsh conditions from cold and heat in winter and summer, as well as from high winds that may occur year-round. Staff would continue to need to store all of their supplies in the vehicle they used for travel to the site and would thus have limited opportunities to provide aid to visitors at the remote site. There would also continue to be no phone or internet service at the site. As a result, employees and visitors would continue to need to rely on personal or work-provided cell phones for emergency communications. The isolated remote site would continue to have no physical structure to direct emergency operations from in the event of an on or offsite emergency.

Because the site is somewhat remote and untended and because there are limited ways to obtain emergency communications in the area, the site has previously been vandalized, with historic objects, such as the pot-belly coal/wood-burning stove in Warehouse #5, stolen.

Alternative 2

There would be long-term beneficial effects on visitor and employee safety from implementing rehabilitation of the Herrmann House and Warehouse #5. Both buildings would be remodeled to provide a weather-tight building envelope that would be impervious to mice and other rodents. Actions would eliminate small holes in both structures and would remove rodent-infested insulation in the Herrmann House.

With adequate shelter and storage space in both structures, employees would no longer need to work from their vehicles to provide a base of operations while at the site. Both employees and visitors would be provided shelter from adverse weather conditions and would be more likely to spend longer periods at the site without fear of exposure or illness related to inhospitable conditions. Employees could also respond to minor first aid situations and provide visitors some comfort while doing so. There would also be adequate communications services at the site, including phone and computer internet systems.

Prior to rehabilitation of the Herrmann House and Warehouse #5, additional hazardous materials surveys would be conducted and would guide rehabilitation work.

Establishing a parking area, gravel roadways and driveways and providing other visitor use pathways connecting these spaces would dramatically improve basic visitor and staff safety by clearly delineating additional roads and pathways, providing safe and accessible parking, evaluating and mitigating additional safety hazards, and providing traffic calming devices, safe crossings and signage to and within the site. As noted in the scope and cost validation report for circulation, "These improvements will bring Minidoka up to the basic level of visitor and staff safety commonly expected of an NPS park or site (FFA 2010a).

Staffed operations at the site, shelter, alarm systems on the buildings and security lighting would all provide enhanced safety for employees and visitors. In addition, employees and visitors would be safer with the provision of potable water at the site and providing fire suppression water storage facilities.

Alternative 3

Impacts would be the same as in Alternative 2 regarding correcting safety hazards associated with the Herrmann House and Warehouse #5. There would also be new impacts associated with the trail and the rehabilitation of the historic alignment of Hunt Road. Although the historic

alignment of Hunt Road is partially used as an administrative road, locating visitor vehicle traffic along the historic alignment, especially wide vehicles would result in potential safety hazards from visitors near the roadway on the trail. Traffic on the rehabilitated road would be expected to travel at low speeds (25 or below), however because the road passes adjacent to several site features, drivers on the road could be distracted by these features, resulting in potential adverse effects on visitor safety. The proximity of the trail to the road in the former administration area is similar to the proximity of the trail and the road close to the former Minidoka 7th Avenue, a gravel road intended for use as administrative access to the Farm-in-a-Day and fire station area.

Staff from the park also expressed some concern with the proximity of the rehabilitated roadway to the proposed restroom on the end of the Warehouse #5 slab; concerns with visitor vehicles stopping near the Herrmann House and/or in the middle of the roadway to observe site features; and concerns with the proximity of the doors to the roadway near Warehouse #5.

Overall long-term impacts would be minimal because of the slow speed on the roadway. Other measures to minimize impacts could also be included, such as requiring buses, recreational vehicles, delivery trucks and other large vehicles to use the existing nonhistoric alignment of Hunt Road to access the site.

Visitor Access, Visitor Use Opportunities and Visitor and Employee Safety Measures to Avoid, Minimize or Mitigate Impacts

Measures in the proposed project (as appropriate to the alternative actions) to minimize impacts to visitor experience, including access, opportunities, and safety would be as follows:

- The park would work with Jerome County to reduce speed through the historic site on Hunt Road.
- Develop a safety plan prior to the initiation of construction to ensure the safety of visitors, workers, and park staff.

Cumulative Impacts: Despite the conversion of much of the former Minidoka War Relocation Center to farmland and grazing area and intentional removal of buildings and facilities, there continue to be opportunities to experience the area and to understand its significance. These opportunities have been enhanced in recent years by the return of a reconstructed perimeter fence, reconstruction of the guard tower and stabilization of rock walls at the entrance, and the addition of a barrack and mess hall in Block 22. These enhancements supplement the remaining historic structures on site, including the remains of the entrance buildings, and the Fire Station, Root Cellar and part of Warehouse #5 as well as building foundations and other site features throughout the area. More than 60 years following its abandonment, Minidoka NHS offers 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 the provision of a small degree of visitor services, such as on the site loop trail, is possible.

Elsewhere the story of the incarceration of Japanese citizens during World War II has been expanded. Another four NPS sites (Manzanar, Tule Lake, Bainbridge Island, and Honouliuli) and now are primarily dedicated to honoring incarcerated and this event in American history. Several other sites not affiliated with the NPS also provide some information about the incarceration (Heart Mountain in Wyoming, Jerome in Arkansas, and Topaz in Utah). Although there are other local, regional and NPS sites in the region and in southern Idaho, only one of these (the Jerome County Historical Museum) supplements the story told at Minidoka. As a result, the visitor experience at Minidoka is integral to understanding of this period in the Northern Rockies region and beyond, including in the Pacific Northwest, which was the home of many of those incarcerated at the Minidoka War Relocation Center.

In Alternative 1, the opportunity to improve the visitor experience at the site would remain unrealized. Most visitors would continue to have a more limited experience, lacking the amenities which would improve their ability to fully understand the incarcerated experience and the remaining and restored components of the site. Alternative 1 would continue to have ongoing adverse effect on visitor experience from minimal visitor access and opportunities. Safety concerns, primarily for employees accessing poorly maintained buildings, would remain.

Unlike Alternative 1, the proposed rehabilitation of the Herrmann House and Warehouse #5 under Alternatives 2 and 3 would complement existing interpretation along the site trail, and would greatly enhance employee and visitor comfort in experiencing the site. Visitor access and opportunities would also be enhanced for a wide range of visitors, through interpretive exhibits, information and activities.

When the actions associated with Alternative 1 are combined with other past, present and reasonably foreseeable future actions, such as additional modifications to Block 22, there would be opportunities to build on the existing visitor experience, but without site presence and an interpretive welcome facility, such as the visitor contact station, visitor experience would remain below a key threshold or standard expected at national park sites, a long-term adverse effect on visitor experience. Similarly, when the actions associated with Alternatives 2 and 3 are combined with other past, present and reasonably foreseeable future actions, including other planned facilities, these alternatives would enhance the ability of visitors to understand the site and therefore add immeasurably to the visitor experience at the site, a long-term beneficial effect.

Conclusion: Alternative 1 would continue to have short- and long-term adverse effects on visitor access, opportunities and safety, including cumulative adverse and beneficial effects. Alternatives 2 and 3 would have short-term adverse effects from closure or delays in visitors accessing some areas during construction coupled with long-term beneficial effects on visitor access, opportunities and safety, including cumulative beneficial effects. Alternatives 2 and 3 would provide for strategically located parking, better access to site features, improved access to historic structures, and site furnishings for accessibility and other amenities that would enhance visitor comfort and understanding. Compared to Alternative 2, Alternative 3 would restore more of the historic landscape circulation pattern and would fully replicate the mass and form of Warehouse #5.

h. Park Operations Impacts

Alternative 1

There would be no additional impacts on park operations from the implementation of Alternative 1. Ongoing impacts from co-managing the site with Hagerman Fossil Beds National Monument would continue to occur. These impacts would continue to include having some staff divide their time between the two sites. Employees would continue to have to drive approximately 38 miles (one hour) from Hagerman headquarters to Minidoka to conduct interpretive programs and/or to undertake work at the site and then return to Hagerman following work at the site.

Employees would continue to work from their own and/or park vehicles to implement work at the site. There would continue to be no shelter at the site to provide for adequate work space. There would continue to be no onsite storage of materials or equipment needed for interpretation or maintenance. The site would remain unstaffed during much of the day except when interpretive or maintenance activities were occurring.

As noted above, employee health and safety would continue to be compromised by the commute to the site, the remote nature of the site, and because emergency communications and assistance would be limited. Minimal first aid equipment is available for the high probability of accident response at the site due to the isolated roadway, site hazards and poorly maintained structures.

Alternatives 2 and 3

There would be temporary adverse effects on park operations from overseeing the implementation of the proposed building rehabilitation projects. These would be shorter for the Herrmann House rehabilitation than for the Warehouse #5 rehabilitation. Long-term beneficial and adverse effects on park operations would occur as a result of the need to manage and maintain the rehabilitated facilities. The beneficial effects however, would likely outweigh the adverse effects, especially initially, when the facilities were in excellent condition, just after rehabilitation. Later, maintenance needs would likely increase but would be spread out over time. Beneficial effects would be greater than adverse effects on park operations because of the ability to stage day-to-day operations at Minidoka NHS rather than having to commute daily from Hagerman Fossil Beds NM for administrative, interpretive, resource and maintenance activities.

The project would also benefit park operations as an opportunity for the NPS to demonstrate its leadership role in sustainability and historic preservation and from the long-term beneficial effects in the ability to provide outstanding visitor use opportunities at Minidoka NHS.

Specific beneficial effects would result from employees being able to work in and from the Herrmann House and the visitor contact station, including from the ability to provide onsite orientation and information to visitors from the lobby/information desk and from being able to talk specifically about the Minidoka War Relocation Center by pointing to visitor contact station exhibits and the original configuration and interior of Warehouse #5.

In addition, the secure sheltered space in the visitor contact station would provide employee office space, a place to store assistive listening devices, brochures for the park and other related areas, a small sales area for the park cooperating association (Discover Your Northwest), and first aid supplies and storage.

Opening the visitor contact station would provide essential visitor services not currently on-site and allow the NPS to establish a visible presence and regularly engage visitors. It would allow for improvement in cultural and natural resources protection and provide a safe and secure working environment for NPS staff (NPS MIIN 2009).

Adaptive reuse and rehabilitation of historic Warehouse #5 and construction of a new addition would provide visitors with a point of orientation and interpretation for the Minidoka and its immense scale. The existing 2,300 square foot floor area, open interior space, and central location of Warehouse #5 and make it the ideal vantage point for groups to gather, preview the site, explore and reflect on the Minidoka experience. The addition will restore the original warehouse's overall massing and provide year-round weather protection for employees and visitors (NPS MIIN 2009). This overall massing would be slightly more evident in Alternative 3.

Measures to Avoid, Minimize or Mitigate Impacts

Measures in the proposed project (as appropriate to the alternative actions) to minimize impacts to park operations would be as follows:

- Rehabilitation of the buildings would be designed to require minimal long-term maintenance.
- The park would monitor construction activities to ensure mitigation measures are incorporated and effects are limited.

- The park would provide an orientation to construction workers about the sensitivity of park resources and values, and about regulations protecting these.

Cumulative Impacts: Because NPS management of the site is still relatively recent, over time an increasing array of park operations have been necessary. Maintaining and interpreting the site would continue to have increasing effects on park operations, including additional needs for funding and staffing. In Alternative 1, these activities would remain limited by the inadequacy of park facilities for daily use. In Alternatives 2 and 3, there would be day-to-day routine operations at the site because it would host facilities with spaces for administrative, interpretive and maintenance operations. When the actions in Alternative 1 are added to past, present and potential future management actions, there would continue to a range of adverse effects on park operations from the limited ability for employees to stay at the site without shelter. Because there would continue to be minimal overall operations in Alternative 1, these would remain below expected standards. In Alternatives 2 and 3, day-to-day park management operation needs would increase, with the need to staff new facilities on a regular basis and to conduct day-to-day routine maintenance activities, such as water treatment system maintenance. As a result, overall adverse and beneficial effects would both increase. Both alternatives would increase responsibilities at the site over time compared to Alternative 1. When past, present and reasonably foreseeable future actions are added to Alternatives 2 and 3, there would continue to be an array of both adverse and beneficial cumulative effects.

Conclusion: There would continue to be a range of beneficial and adverse impacts on park operations in Alternative 1 and adverse impacts from long employee commutes and no facilities at the site would continue to outweigh any beneficial effects from operations conducted at the site. Although Alternatives 2 and 3 would contribute to the need for increased park administrative, interpretive and maintenance operations, resulting in long-term adverse effects, these operations would also be more easily accomplished from the provision of new onsite visitor and administrative facilities at Minidoka NHS.

i. Socioeconomic Impacts

Alternative 1

There would be no additional impacts on socioeconomics from the implementation of Alternative 1. Current conditions would remain, which include no improvements to parking for visitors, no formal visitor center/contact station, and no onsite administrative offices. Recreation visits and spending for the historic site would be combined with Hagerman Fossil Beds NM because it provides administrative facilities and information for the site. Intermittent small beneficial effects on socioeconomics on adjacent communities, such as Jerome, Hagerman and Twin Falls would likely continue to occur from visits to the site; however these would be small and undetectable in comparison to overall benefits from tourism related to other areas in the vicinity. Beneficial effects may increase slightly during the annual pilgrimage of former incarcerated and their families from additional spending on food and accommodations in the area but would likely remain small. Because the park does not have a visitor contact station and there are no signs off nearby highways to direct visitors to the area, visitation and consequent longer stays in the local area would be likely to remain low compared to a situation proposed in Alternatives 2 and 3 where a visitor contact station would be open regularly at the site, highway signs would be available and park employees would be stationed onsite.

Alternative 2

There would be a variety of short- and long-term beneficial impacts on socioeconomics from the influx of spending associated with a new visitor contact station within the boundary of Minidoka

NHS and anticipated consistent visitor use of the site. Consistent uses would also occur as a result of the development of an administrative office/ranger station and a full time ranger presence. Because some building materials and supplies would likely be procured locally, while others may come from outside the area, it is not possible to predict the overall benefit to the local economy; however, contractors and sub-contractors may be hired from the local area, such as from Jerome or Twin Falls. If a contractor from outside the area is hired, they would likely set up a base of operations in the vicinity and spend money on supplies, equipment and personnel during the construction period.

Once the Herrmann House and Warehouse #5 were fully rehabilitated and open for public use, visitation would likely increase because the visitor center would provide a great deal of beneficial effects on visitor experience, including learning and enjoyment. Visitation could increase fairly dramatically if signs were placed noting the location of the historic site off of Interstate 84 and Highway 93, resulting in additional long-term beneficial effects. The park is approximately 20 miles off Interstate 84 from either direction (coming from Boise or from Salt Lake City). U.S. Highway 93 and State Route 75 are also heavily traveled because of the high tourism locality of Ketchum and Sun Valley, Idaho. From the intersection of State Route 25 and U.S. 93 / State Route 75, the site is approximately 18 miles.

Overall, increased visitation and access to useable space (approximately 5,500 square feet with 24 delineated parking spaces) would mean additional tourist spending in the south central Idaho. The interagency regional visitor center, managed by the Twin Falls visitor bureau and which contains exhibits about nearby NPS and BLM recreational destinations, including Minidoka, is located in Twin Falls and opened in spring 2015. Already, the visitor center directs visitors to Minidoka NHS and opportunities for this would increase with the provision of the new visitor and administrative facilities at the site.

Alternative 3

Socioeconomic impacts would be similar to Alternative 2, with slightly greater beneficial impacts from the increased construction costs related to providing for the rehabilitation of the historic Hunt Road through the site and for the full replication of the Warehouse #5 building.

Measures to Avoid, Minimize or Mitigate Impacts

Measures in the proposed project (as appropriate to the alternative actions) to minimize impacts to socioeconomics would be as follows:

- Where possible projects would be combined or phased to allow for cost-savings.
- New facilities would use recycled or reused materials to the extent practicable; however, due to the historic significance of the structures, the Secretary of Interior Design and Guidelines for historic structures will be followed to ensure the integrity of the features is not lost.

Cumulative Impacts: Over time, the historic site has exerted a strong influence on the area economy beginning with the construction of the camp using local labor through the operation and final closure of the camp. Since closure of the Minidoka War Relocation Center, however, economic activity has been limited to ongoing farming and agricultural operations outside the historic site. With the designation of the Minidoka National Historic Site, the ability of the area to increase economic activity via tourism was expanded. Past, present and future actions, particularly associated with the provision of increased visitor services at the site would likely continue to result in increased economic activity that would benefit Jerome and Twin Falls counties. Alternative 1 would not add any cumulative beneficial impacts to socioeconomics. Alternatives 2 and 3, however would contribute more short-term economic benefits during the

construction period, and long-term socioeconomic benefits locally and possibly regionally as more visitors become aware of and are attracted to the site and the facilities provided.

Conclusion: Alternatives 2 and 3 would both provide greater long-term beneficial effects on socioeconomics than Alternative 1 (existing conditions).

Table 4: Impact Comparison Chart

| Resource | Alternative 1 Impacts | Alternative 2 Impacts | Alternative 3 Impacts |
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| Geology / Soils | Existing impacts would continue. Additional adverse and beneficial impacts from removal of non-historic structures. | <p>Same as Alternative 1 plus: Adverse impacts from</p> <ul style="list-style-type: none"> Excavation and grading for Herrmann House crawl space (40 sf), accessible entrance modifications (210 sf), septic tank, drainfield (400 sf), utilities (104 sf).and parking (450 sf). Total: approx. 1,204 sf. Excavation and grading for new Warehouse #5 concrete pad (5,040 sf), building addition, septic tank (1,600 sf), drainfield (6,900 sf), and utilities (4,300 sf). Total: approx. 13,540 sf (0.31 acres) Excavation and grading to install the fire suppression system on Warehouse #9 slab (1,680 sf). Excavation and grading for visitor parking and turnaround (1.3 acres). Compaction related to construction staging and site modifications. Disturbance from trail modifications. <p>Beneficial impacts from</p> <ul style="list-style-type: none"> Rehabilitation and revegetation of areas disturbed by construction and for landscaping. | Same as Alternative 2 plus: Additional adverse impacts from reconstructing the new entrance road (1.03 acres). |
| Water Resources | No additional impacts on water quality or quantity. Existing impacts from area runoff would continue. | Installation of two septic systems would cause incremental impacts on water quality which would be mitigated by construction of | Impacts would be the same as in Alternative 2 except for additional water use during construction to facilitate rehabilitation of the former road into the |

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| | | <p>drainfields.</p> <p>Short-term impacts from use of water during construction, coupled with long-term impacts from use of water for administrative and visitor services. Reactivation of two onsite wells and adding a fire suppression system would result in additional water use, similar to previous use of the site for BOR housing and operations, but much less than during the historic period.</p> | <p>site and a higher potential for water quality impacts from runoff associated with rehabilitation of the former roadway.</p> |
| Air Quality | No additional impacts. | Low level of new short-term impacts related to construction and similar low level long-term impacts related to emissions from increased visitation at the site. | Impacts would be similar to, but slightly greater than in Alternative 2 from rehabilitation of the existing alignment of the former Hunt Road through the camp. |
| Vegetation | No additional impacts. Some ongoing slight adverse and beneficial effects. | Additional beneficial effects from removing nonnative vegetation and conducting revegetation and additional adverse effects from incremental loss of native vegetation from actions to rehabilitate the Herrmann House and Warehouse #5 and to provide other visitor and administrative support operations, such as visitor and employee parking. | Impacts would be similar to Alternative 2. Slightly more vegetation would be affected where it intercepts the historic alignment of Hunt Road through the camp. |
| Wildlife | No additional impacts. | Short-term noise and activity during construction operations lasting approximately one year total for rehabilitation of both structures. Incremental loss of habitat from removal of native and nonnative vegetation. Beneficial impacts from rehabilitation of disturbed areas with native vegetation and from landscaping. Long-term noise and activity during the day from operation of visitor and administrative facilities would vary. | Impacts would be similar to Alternative 2, with slightly more noise from reuse of the central road through the camp and from potential to affect wildlife crossing that road. |
| Archeological Resources | No additional impacts. Potential for | Potential for impacts to historic | Same as Alternative 2. |

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| | continued deterioration of historic landscape, including historic archeological resources without rehabilitation actions. | archeological resources from excavation within the area of potential effects, however, mitigation measures are intended to prevent additional impacts. No prehistoric archeological resources have been found or are expected. | |
| Historic Structures / Cultural Landscapes | No additional impacts. Likely continued deterioration of historic buildings and structures without rehabilitation actions. | Rehabilitation actions for the Herrmann House, Warehouse #5, Warehouse #9 and other areas would have no adverse effect on historic structures or cultural landscapes (buildings and structures and circulation), and would meet the Secretary of the Interior's Standards for Rehabilitation by retaining historic fabric where possible, using replacement-in-kind, upgraded replacement-in-kind, and compatible new additions. There would be no effect on some cultural landscape characteristics (natural systems and features, spatial organization/cluster arrangement, cultural traditions or vegetation). | Same as Alternative 2 |
| Visitor Experience: Access and Transportation | No additional impacts on visitor access or transportation, however existing adverse impacts from no shelter, very little information, limited directional signage and other impediments to visitor access would continue. | Long-term beneficial impacts on visitor access from new visitor and administrative facilities which provide wayfinding, information, interpretation, shelter, new parking, ranger presence, and site security. | Same as Alternative 2. In addition, there would be a more logical sequence of entering the site with the reconstructed Hunt Road. There would also be temporary adverse effects during construction that could affect access to site features, such as part of the loop trail. Parking circulation routes would also be improved. |
| Visitor Experience: Visitor Use Opportunities and Interpretation and Education | No new visitor use opportunities or interpretation/education. Visitors could continue to take advantage of entrance area exhibits and the site loop trail. | Long-term beneficial impacts from a range of new visitor use opportunities, including open visitor and administrative buildings, indoor and outdoor exhibits, accessible restrooms, gathering space, shelter, parking | Same as Alternative 2 plus an expanded shelter in a larger structure with more space for activities during inclement weather. |

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| | | (including for large vehicles) and wayfinding signage. | |
| Visitor and Employee Safety | No additional impacts. Short- and long-term adverse effects from existing conditions, including some hazards, would continue. | Long-term beneficial effects on visitor and employee safety from rehabilitation of the Herrmann House and Warehouse #5. Buildings would provide adequate shelter and storage space and provide employees a place to work from. Formal entrances to both buildings and the site, safe and accessible parking, traffic calming and other measures undertaken during rehabilitation would improve visitor and employee safety. Additional benefits from providing potable water and fire suppression capability. | Similar to Alternative 2, however, there could be some potential hazards associated with the close alignment of the site loop trail and the entrance road, if not mitigated by park operations guidelines. |
| Park Operations | No additional impacts. Ongoing adverse impacts on employees and park operations from long commute to isolated site with very few facilities, no shelter and no storage. | Short-term adverse effects from overseeing rehabilitation actions combined with long-term beneficial effects from improving day-to-day employee operations for administration, interpretation, maintenance, and resource management at the site. Some long-term adverse effects from managing new facilities. | Same as Alternative 2 |
| Socioeconomics | No additional impacts. Small, undetectable benefits from spending on food and accommodations during annual pilgrimage and from other visits to the site. | A variety of short- and long-term beneficial effects from construction spending, adding park operations at the site, providing directional signage on nearby highways, and advertising the availability of the site for school and other group visits. Compared to the present situation, there would be a visitor center open regularly at the site, employees working from the site and highway signs directing visitors to the site. | Similar to Alternative 2 with somewhat greater construction costs from a larger building and rehabilitated entrance road. |

Chapter V: Consultation and Coordination

A. Summary of Public Involvement

Minidoka National Historic Site issued a press release regarding the proposed project on July 17, 2015 with a deadline for comments of July 31, 2015; however public scoping for the project has been ongoing for some time through notifications to both the local and regional community through onsite annual pilgrimages over the past several years.

The press release did not result in any public comment letters being received by the park via regular mail, email or the Planning, Environment and Public Comment website (www.parkplanning.nps.gov). There is no indication that the press release was published in any local media. Additional public review of the proposed project will occur during the 30-day public review period for this Environmental Assessment. Mention of the proposed project during the June pilgrimage to the site and its associated forum resulted in a number of conversations with attendees about the proposal but no letters.

B. Agency Consultation

State Historic Preservation Office

SHPO consultation has been ongoing with a series of phone calls and emails regarding the scope of proposed rehabilitation for the Herrmann House. Staff from the Idaho SHPO has participated in one on/off site planning meeting in fall 2014 during the development of the rehabilitation of the Herrmann House and Warehouse #5. Comments from the SHPO guided proposed rehabilitation design development for both buildings. Additional consultation with the SHPO is ongoing. The SHPO is being provided with design development drawings of both structures and attendant components. A copy of this Environmental Assessment as well as a formal request for concurrence with the determination of *no adverse effect* on the characteristics that allowed the Minidoka War Relocation Center site to be listed and then expanded on the National Register of Historic Places and the Herrmann House to be determined eligible for the National Register will be sent to the SHPO.

U.S. Fish and Wildlife Service

The USFWS website was consulted to obtain the species list for Jerome County, which is required under Section 7 of the Endangered Species Act. None of the species noted have been identified from the park. Because analysis herein has shown that there would be no effect on any species listed or proposed as threatened or endangered, no further consultation is necessary under Section 7.

The Shoshone-Bannock Tribes

A scoping letter was sent to the Shoshone-Bannock Tribes on July 17, 2015 to Fort Hall Business Council chairperson, Nathan Small. To date no response has been received to this letter or additional phone messages. To date, consultation has not revealed tribal interest in actions affecting Minidoka NHS.

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