

## Attachment 3: Public Comments and Responses

### **TULE GMP/EA Public Review**

Public review of the Tule Lake Unit GMP/EA was a required step in the planning process, and the extent of public review opportunities for the Tule Lake Unit GMP/EA far exceeded NPS policy requirements. By making the GMP/EA available for public review and comment, the public was provided an opportunity to understand the direction of NPS decision making and invited to provide information and ideas about the GMP/EA. Comments that expressed support for or opposition to the preferred alternative or another alternative were not considered substantive. Furthermore, the quantity of comments for or against a specific alternative was considered, but it was not a determining factor in identifying the selected action.

The GMP/EA was released to the public on November 3, 2016. The GMP/EA document, summary newsletter, and/or e-newsletter were distributed to agencies, organizations, and individuals on the unit's mailing list, totaling more than 1,000 contacts. See the list of recipients on page 181 of the GMP/EA document. Press releases, posters, a short video, and posts on NPS social media sites further announced the release of the GMP/EA and public comment period. The official comment period closed on February 10, 2017 and was formally extended to February 28, 2017 to allow for additional agency and public comments.

### ***Written Comments and Public Meetings***

The NPS received 1,017 written responses in the form of letters, e-mails, newsletter response forms, and web comments. In total, the feedback received both in writing and from the public meetings comprises almost 3,400 separate comments.

Comments, both through public workshops or written correspondence, were received from the following organizations, affiliates, and elected officials:

### **AGENCIES AND ORGANIZATIONS SUBMITTING OFFICIAL COMMENTS**

Asian Bar Association of Sacramento Law Foundation  
California Council of Churches IMPACT  
California State University, Chico, Department of Anthropology  
Congressman Doug LaMalfa  
Japanese American Citizens League, Sacramento Chapter  
Kimochi, Inc.  
Law Professor Educators and Lawyers Supporting Alternative C

Modoc County Board of Supervisors  
 Modoc Tribe of Oklahoma  
 National Japanese American Historical Society  
 National Parks Conservation Association  
 Sierra Cascade Nursery  
 Tule Lake Committee  
 Tulelake Growers Association  
 Tulelake Irrigation District  
 Tulelake Basin Republican Women  
 Wong Potatoes

The NPS held public meetings in California, Oregon, and Washington between November 28, 2016 and January 18, 2017. Four hundred twenty-four people participated in the meetings and provided oral comments.

LOCATION	DATE	ATTENDANCE
Tulelake, CA	November 28, 2016	39
Klamath Falls, OR	November 29, 2016	25
Los Angeles, CA	December 1, 2016	30
Carson, CA	December 2, 2016	35
Sacramento, CA	December 6, 2016	65
Sacramento, CA	December 7, 2016	28
San Francisco, CA	December 8, 2016	35
San Jose, CA	December 8, 2016	32
Seattle, WA	December 13, 2016	34
Portland, OR	December 14, 2016	<i>Cancelled due to winter weather</i>

LOCATION	DATE	ATTENDANCE
Hood River, OR	December 15, 2016	<i>Cancelled due to winter weather</i>
Virtual Meeting 1	January 10, 2017	5
Virtual Meeting 2 (online and New York, NY)	January 18, 2017	35
Tulelake, CA	January 18, 2017	61
<b>TOTAL</b>		<b>424</b>

**AFFILIATIONS/ASSOCIATIONS NOTED BY PUBLIC MEETING ATTENDEES OR COMMENTERS**

1882 Foundation  
ACC Senior Services  
AFSC  
American Civil Liberties Union  
AmeriCorps  
Asian Community Venter  
Asian Pacific Islander Americans in Historic Preservation  
Asian Pacific Islander Equality–Northern California  
Asian Pacific Islander Queer Sacramento Coalition  
Basin Ambulance  
Blue Lake Rancheria  
Boston Chinatown Neighborhood Center  
Boston Public Schools  
Buddhist Church of Sacramento  
Buddhist Church of San Francisco  
Cal Poly Pomona University  
California Museum  
California State Department of Transportation  
California State University, Chico, Anthropology Department  
California State University, Dominguez Hills

California State University, East Bay  
California State University, Sacramento  
California State University, Sacramento, History Department  
Camera News “Resistance at Tule Lake”  
Cantua Elementary  
City of Tulelake  
College of San Mateo  
Conference of Asian Pacific American Law Faculty  
CONSCIENCE AND THE CONSTITUTION  
Democratic National Committee  
Densho  
Diablo Taiko  
FJCUSA  
Fred Korematsu Institute  
Friends of Manzanar  
Furamoto Realty  
Go for Broke National Education Center  
Heritage Resources Management  
Hongwanji-ha Buddhist Temple  
Japanese-Americans, Japanese in America New York  
Japanese American Citizens League  
Japanese American Citizens League, Berkeley Chapter  
Japanese American Citizens League, Florin Chapter  
Japanese American Citizens League, Eden Chapter  
Japanese American Citizens League, Pacific Southwest District  
Japanese American Citizens League, Puyallup Valley Chapter  
Japanese American Citizens League, Sacramento Chapter  
Japanese American Citizens League, San Francisco Chapter  
Japanese American Citizens League, San Mateo Chapter  
Japanese American Citizens League, Seattle Chapter  
Japanese American Citizens League, Sequoia Chapter  
Japanese American Citizens League, Spokane Chapter  
Japanese American Citizens League, Watsonville-Santa Cruz Chapter  
Japanese American Museum of San Jose  
Japanese American National Museum  
Japanese Community Youth Council  
Japanese Community and Cultural Center of Northern California  
Japanese Community and Cultural Center of Washington  
Japantown Merchants

KBC News  
LatCrit – Latina and Latino Critical Legal Theory, Inc.  
Lava Beds Natural History Association  
Little Tokyo Historical Society  
Macy’s Flying Service  
Magna Systems, Inc.  
Manzanar Committee  
Massachusetts Asian American Educators Association  
MD Huffman Farms  
Medicare for all - Santa Cruz  
Modoc County  
Montana State Senate (retired)  
National Japanese American Historical Society  
National Japanese American Memorial Foundation  
NCRR  
New York Day of Remembrance  
*Nichi Bei* Weekly  
Nichibeicare Network  
Nikkei for Civil Rights & Redress  
Nikkei Student Union, University of California, Davis  
Occidental College  
Oregon Technical College  
Port Washington Crisis Relief Team  
Publicity Agents  
*Rafu Shimpo*  
Representative of Congressman Doug LaMalfa  
Resisters.com  
Restorative Schools Vision Project  
Sacramento Area Peace Action  
*Sacramento Bee*  
Sacramento Buddhist Meditation Group  
San Francisco Nisei Fishing Club  
Seattle Central Community College  
Sisters of St. Francis of Penance and Christian Charity  
Spokane Buddhist Temple  
St. Jude's Episcopal Church  
State University of New York, Albany  
Sycamore Church  
TACMC  
Tule Lake Unit General Management Plan

Tanforan Assembly Center Memorial Committee  
Texas Lutheran University  
The Japanese American Association of New York  
*The North American Post*  
The Society of American Law Teachers  
Tule Lake Committee  
Tulelake Basin Republican Women  
Tulelake Chamber of Commerce  
Tulelake Growers Association  
Tulelake Fire Protection District  
Tulelake Fire Department  
Tulelake Irrigation District  
Tulelake Police Department  
Tulelake Public Works  
Tulelake-Butte Valley Fair  
Tuna Canyon  
Underbelly Creative  
U.S. Fish and Wildlife Service  
University of California, Davis  
University of California, Los Angeles  
University of Washington, American Ethnic Studies  
University of Washington, Runstad Center  
Veterans for Peace  
Veterans of Foreign Wars Nisei Post 8985  
Voice of Palestinian Christians  
Western State College of Law

### *Summary of Public Comments*

#### **RANGE OF COMMENTS**

- Participants commented on a wide variety of topics. Commenters universally displayed a strong investment in the Tule Lake Unit and strong opinions about its future management.
- The topics that received the most comments were Alternatives; Tule Lake's Relevance; Interpretation, Education, and Outreach; and Visitor Facilities and Experience.

## ALTERNATIVES

- The National Park Service received more than 1,000 comments on the alternatives. Of those who commented, over 90% supported alternative C, the NPS Preferred Alternative. A small proportion of those in favor of alternative C stated that the alternative did not go far enough in terms of protecting Tule Lake's resources and telling its important stories.
- Alternative A, the no-action alternative, received substantial support, but significantly less than alternative C.
- Alternative B, the limited operations alternative, received support from a very small number of commenters.

## INTERPRETATION, EDUCATION, AND OUTREACH

- Many of those commenting on interpretation and education stressed that Tule Lake's stories be shared with the public, particularly youth, using diverse and creative interpretive techniques. Many of these commenters suggested that the NPS provide self-guided and remote learning experiences in addition to onsite tours. Interactive and immersive methods were especially emphasized. Several commenters suggested that a good way to achieve this would be to allow groups of young people to spend the night at the segregation center and experience some of the conditions that incarcerated experienced during WWII. Others pointed to digital tools that could help visitors understand what it was like to have to live at Tule Lake and suggested ways that such tools could be easily accessed (for example listening to podcasts on smartphones). Several commenters stressed that it is crucial to raise awareness about the incarceration through education.
- Several people noted that access to historic buildings will help the NPS convey the significance of Tule Lake to the public. Some commenters suggested that reconstructing a portion of the segregation center's residential area (including the mess hall, latrine, and barracks) would assist in providing a more immersive visitor experience. Others observed that reconstructing a guard tower and fences, as called for in the preferred alternative, and adding other features such as tanks and tents in the stockade would viscerally convey the feeling of imprisonment and punishment at the segregation center. One commenter asked the NPS to make sure that reconstructions are accurate and not too comfortable or well-built, stating that it is important that they resemble the hastily constructed wartime barracks.
- Some expressed support for the idea of developing a driving tour around the historic segregation center area, sharing information about the residential as well as agricultural areas.

- Many people offered ideas for communicating the immensity of the historic segregation center—the largest of all the WRA confinement facilities—given the unit’s small footprint. Some provided specific suggestions to help visitors visualize the camp in the WWII period.
- Many people identified the visitor center and interpretive rangers as vital to the visitor experience.
- Some commenters asked the NPS to ensure that all exhibits are universally accessible, including for those with visual impairments and those who don’t speak English (for example, there are many Spanish-speaking residents in the local community).
- A few commenters requested that the NPS invest in diversity and cultural competency training for staff members who will be sharing this culturally sensitive story with the public. A small number of commenters suggested that Tule Lake survivors and/or Japanese American stakeholder groups could assist in interpretation and education programs. Several commenters appreciated the discussion of terminology that was provided in the plan to assist readers in understanding the many different ways the incarceration has been described since World War II.
- A small number of commenters stated that they felt that the GMP could provide more emphasis on education, particularly through the use of digital tools.
- One commenter stressed that prioritizing investment in interpretation at the unit is more important to telling its stories than acquiring additional land for the monument.

## TULE LAKE’S HISTORY

### *Tule Lake’s Relevance*

- A large proportion of comments submitted on the plan addressed the continued relevance of Tule Lake’s stories and the need to continue to be vigilant about protecting civil rights and ensuring due process.
- Many people stressed that it is important to remember this history and preserve it for future generations to ensure that this violation of human rights never happens again.
- Some described Tule Lake as the most notorious example of U.S. incarceration camps and stressed that its protection and interpretation is especially critical to conveying this important chapter of American history.
- Many stated that Tule Lake’s lessons are particularly relevant given the growing anti-immigrant sentiment in today’s political climate.

- Several people drew connections between the wartime treatment of Nikkei and the prejudice against Muslim Americans that has increased in the aftermath of September 11, 2001.
- Some suggested that sharing the wartime perspectives of different groups and other examples of historical discrimination could help the unit connect to new visitors and future generations.
- Others emphasized that the preservation and interpretation of the unit's resources will provide the tangible evidence needed to keep Tule Lake's stories alive and relevant for visitors.

### *Stories*

- A large number of commenters shared personal stories related to the incarceration at Tule Lake. Some described their experiences at Tule Lake or in other incarceration camps, others described the experiences of family members and close friends, and some described what life was like outside the segregation center. Several recounted more recent experiences visiting the site.
- Commenters requested that NPS interpretation convey the full spectrum of personal stories associated with Tule Lake, without sanitizing the site's history. Some commenters suggested specific perspectives that they would like the NPS to address in interpretation. These included:
  - the day-to-day life experiences of the incarcerated, including important life events that occurred in the segregation center, such as marriages, births, and deaths;
  - stories of the “no-nos,” the Hoshi-dan, renunciants, and others who dissented;
  - the WRA guards;
  - Nikkei soldiers;
  - Mike Masaoka and the JAACL;
  - Wayne Collins and other supporters of the Japanese American community;
  - Italian and German prisoners of war (POWs) at Camp Tulelake ;
  - the Modoc people;
  - local community history, including homesteading and the influence of the Civilian Conservation Corps (CCC) program;
  - the aftermath of the incarceration, including apology and redress;
  - and recent water conflicts in the Klamath Basin.
- One commenter noted that it was important to explain the diverse pressures during the war that motivated different people to act as they did.

- Oral histories, artifacts, and personal effects such as letters were identified as important ways to share first-hand stories. Oral histories were identified as an urgent priority as many Tule Lake survivors are aging and passing away.
- Commenters confirmed that civil rights and due process are important topics that should be addressed in Tule Lake’s interpretive themes (these topics are described in the foundation for planning in chapter 2 of the GMP).
- A small number of commenters suggested that NPS share stories about the Nikkei community before incarceration, as well as the fear and uncertainty that Nikkei experienced when they were forcibly moved to Tule Lake by train.
- Several commenters stressed that resistance and dissent at Tule Lake need to be part of the story that is told about the unit. Others stated that it is important that interpretation compares Tule Lake to other incarceration camps and assembly centers and explains why Tule Lake in particular was selected for the segregation center.
- A small number of commenters stated that NPS interpretation should provide further detail about the context of Executive Order 9066, specifically about wartime events that fomented fear and mistrust of Japanese Americans.
- One commenter asked that conditions in the segregation center be compared to those that were perpetrated by Axis powers during the war.

### *Historical Information*

- Many commenters on the GMP/EA shared historical information related to the Tule Lake Segregation Center, the WWII incarceration, the arrival of WWII veterans and the development of the local homesteading community, and early efforts to preserve the Tule Lake site.
- Several people noted that Tule Lake’s history and role as a segregation center is complicated, and also observed that it is distinct from and not very well known in comparison to the other incarceration sites. A few people noted that Tule Lake’s history is unique because it includes acts of resistance and dissent by incarcerated Japanese Americans, and the divisions incited by the U.S. government’s so-called “loyalty questionnaire.” Some also described the stigma attached to those incarcerated at Tule Lake that persisted long after the war.
- Many of those sharing historical information noted that preservation of the Tule Lake site is necessary to share the story of the incarceration. The site was described as sacred and demanding of the honor that is given to other sacred landscapes and locations where key events in American history took place.

- Several people noted that the local community was not involved in the decision to locate the WRA center in Tulelake and asked the NPS to include this information in interpretation.
- Some observed that Camp Tulelake has another distinct layer of history associated with the CCC and its use as a POW camp.

### *Modoc and Other Tribal Histories*

- Commenters on this topic stressed that the history of the Modoc and Klamath tribes in the area stretches back millennia and should be included in NPS interpretation of the site.
- Some drew parallels between the unjust removal of the Modoc and the incarceration of Japanese Americans. However, others objected to this comparison.
- Some asked the NPS to ensure that tribal resources and traditional practices are protected, and that spiritual places sacred to the Modoc are honored.
- A small number of commenters observed that the WWII incarceration on the site represents a relatively brief time period when compared with the treatment of the Modoc by the U.S. government over the past two centuries.

## **MANAGEMENT OF SPECIFIC AREAS**

### *Segregation Center*

- Those commenting on facilities expressed agreement with actions in the preferred alternative, including historic building stabilization and adaptive reuse, increased access for visitors and students, and telling the unique history of the Tule Lake Segregation Center.
- Broad support was expressed for the restoration of the jail and reconstruction of stockade area features. Commenters stressed that Tule Lake was the only camp to have a jail and that the jail powerfully underscores the injustice of the incarceration and the unique history of Tule Lake.
- Some commenters expressed a need to carefully protect the jail, in particular the historic graffiti on its inside walls.
- Several commenters stated that the Tule Lake Unit should depict the residential conditions in the camp in addition to the experience of the stockade. This was identified as a challenge given that the NPS does not own any of the former residential areas of the camp.
- Some noted that the size of the segregation center site seems too small to convey the full story of Tule Lake. Several commenters provided suggestions for ways to illustrate the size of the camp and its residential area.

- A small number of people asked that a fence be erected around the perimeter of the historic segregation center.
- Several commenters emphasized the importance of an immersive, physical experience of segregation center site and supported alternative C proposals to maintain and reconstruct historic features. Some suggested the reconstruction of additional structures, including barracks, the mess hall, and a latrine. Others offered ideas for other ways to create a powerful visitor experience.
- Several people stressed that the visitor center function will be crucial to the visitor experience. Many of these commenters questioned whether the ditch rider house and carpenter shop would be large enough to provide necessary services and adequate exhibit space.
- A few commenters requested that the NPS erect a memorial to those who were incarcerated at Tule Lake, specifically honoring those who died.

### *Camp Tulelake*

- Those commenting on Camp Tulelake expressed agreement with actions in the preferred alternative, including building stabilization, increased visitor access, and telling the unique history of Camp Tulelake and its role as an isolation center.
- A small number of commenters observed that Camp Tulelake is relatively far away from the segregation center site and suggested that the NPS explore ways to attract visitors.

### *Peninsula*

- Commenters were generally supportive of increasing guided tours of the Peninsula, as called for in the preferred alternative. Many of those commenting on the Peninsula suggested that it would be valuable to offer self-guided interpretation from the overlook, and some suggested that this interpretation should be provided in the form of a wayside illustrating the size of the camp.
- Several commenters requested public access to the Peninsula.
- A few commenters expressed support for restricting public access on the Peninsula to protect Modoc archeological sites and wildlife.
- Some people stated that public access to the Peninsula should not be allowed.
- A few people asked that the NPS ensure that its interpretation includes the history of incarcerated use of the Peninsula before segregation.
- One commenter urged the NPS to improve trail conditions on the Peninsula.

## GENERAL VISITOR EXPERIENCE

- Many people expressed support for the year-round public access proposed by the preferred alternative.
- Some noted that an NPS presence and interpretive displays at the unit are currently lacking.
- Several people noted that Tule Lake is very remote and provided ideas for attracting visitors to the unit. Others noted that actions called for in the preferred alternative will provide an increased draw for visitors to the area.
- Some commenters observed that the individual sites that comprise the unit are distant from one another. These commenters noted that finding and understanding the connection between the three sites can be confusing for visitors.
- A few suggested a need for overnight accommodation in the area, and one commenter suggested that a camping facility could help provide this.
- Many cited the visitor experience at Manzanar National Historic Site as a model to strive for.

## RESOURCE PROTECTION

- Those commenting on cultural resource protection expressed support for stabilization, restoration, and adaptive re-use of existing historic structures at the segregation center site and Camp Tulelake, as called for in the preferred alternative.
- Commenters expressed support for protection of the segregation center site for future study, including archeological investigations. A few individuals stressed that the NPS needs to survey existing cultural resources on unit lands, as called for in the preferred alternative.
- Some suggested that the NPS emphasize increased training for staff in the cultural significance of the site and its resources to those communities that were most impacted by the incarceration.
- The significance of the Tule Lake Basin ecosystem was highlighted by one commenter, who stated that its unique resources and location along the Pacific Flyway make it a valuable habitat for waterfowl and other species and an attractive recreational resource for outdoor enthusiasts.

## LAND PROTECTION AND BOUNDARIES

- Several commenters who supported alternative C asked that the plan call for a park boundary adjustment in order to encompass resources within the entire extent of the former segregation center. These commenters suggested that a

boundary adjustment would more strongly convey the scale of the camp and the experience of incarceration.

- Several commenters raised concerns about historic resources that are not within the Tule Lake Unit boundary. These resources included the cemetery, residential barracks areas, and landfill.
- By contrast, other commenters who favored alternative C supported its provision that the unit boundaries remain unchanged.
- Others who commented on the boundary stressed that the NPS should focus on the acreage it already has. Several of these commenters stated that there is enough land already within the unit to adequately tell Tule Lake's story. These commenters suggested that a larger site will not necessarily provide more impact and pointed to examples of powerful sites and monuments that convey strong emotion within a small space.

#### **TULELAKE MUNICIPAL AIRPORT**

- Comments on the Tulelake Municipal Airport were outside the scope of the GMP, however the NPS received many comments on the topic. See the “Substantive Comments and Responses on the draft GMP/EA” for specific comments.

#### **LOCAL COMMUNITY**

- Many of those who commented on the local community asked the NPS to pursue opportunities to collaborate with local citizens and organizations. Commenters provided suggestions for ways that the NPS could benefit the Klamath Basin community, ranging from a potential increase in economic activity associated with the park to increased educational programs in local schools. Others suggested that the NPS partner with local community groups to increase connections between the NPS and its neighbors. Several commenters emphasized that it is important that the Tule Lake Unit benefit the local community as well as other stakeholder groups.
- Many commenters on this topic also expressed concern about future impacts that the unit might have on local residents and businesses. Several people asked the NPS to ensure that privately owned land and existing businesses in the local area are treated respectfully.
- Several people suggested that the NPS include more history about the local community in interpretive materials.
- Several people were also concerned about how the Tule Lake Unit could impact the local economy and operations as a rural farming community.

## PARTNERSHIPS

- Many people identified partnerships as critical to the long-term development of the Tule Lake Unit. Several observed that it will be necessary to increase outreach to help the Tule Lake Unit meet the goals of the preferred alternative.
- Those commenting on partnerships offered specific suggestions for ways the Tule Lake Unit might engage with the local community, visitors, Japanese American organizations, students, educators, other agencies, and other national park units. The ideas shared provided a variety of ways to share the stories, experiences, and artifacts of Tule Lake and reach as wide an audience as possible.
- Some commenters suggested that NPS partnership with local businesses and landowners could help protect historic resources on lands adjacent to the unit.
- Some suggested that the NPS partner with organizations outside the immediate park vicinity in order to make Tule Lake's history more accessible to those who cannot travel to the site.
- A small number of people suggested the formation of a scholarly advisory committee of historians and linguists to help support interpretation at the unit.

## IMPLEMENTATION

- Several commenters stated that they felt that 20 years was too long to implement the preferred alternative. Some who held this position emphasized that it is important to do as much as possible, as quickly as possible, so that elders and Tule Lake survivors can experience the site and share their stories.
- It was suggested that the preferred alternative could be accomplished in two phases instead of three phases to allow work to proceed more quickly.
- Others noted that the preferred alternative's organization into three phases was a logical and realistic way to approach the proposed actions.
- Some expressed concern that breaking the preferred alternative up into phases may delay funding of actions that are planned for phase 2 or 3.
- A few people asked the NPS to provide additional detail about the timing for each phase.

## FUNDING

- Many commenting on funding acknowledged that it may be difficult for the NPS to dedicate the necessary funding to complete the actions proposed in the preferred alternative; many also questioned whether funding for the Tule Lake Unit would be stable.
- Several people who commented on funding noted that they felt that alternative C would cost too much to implement. Some observed that the site's remote

location may mean that it does not receive as much visitor use as national park units in more heavily visited areas, and as a result they suggested reducing the cost of the preferred alternative.

- Several other commenters stated that the amount of funding requested seems reasonable and achievable for the project.
- Others commenting on this topic stressed the importance of committing federal funds to ensure the protection of the Tule Lake Unit and visitor accessibility, given the national significance of what occurred on the site during World War II.
- Others asked about the feasibility of raising funds through donation or entities other than the NPS.
- Others stated their financial commitment to support the completion of major projects or the acquisition of collections items for the Tule Lake Unit.
- A few commenters asked whether tax breaks or financial incentives could be provided to local residents for their assistance in protecting historic resources on private lands.

#### **NAME CHANGE TO TULE LAKE NATIONAL HISTORIC SITE**

- The majority of those commenting on the proposed unit name change were in favor of changing the name to Tule Lake National Historic Site. Those expressing support for a name change cited the unique history of Tule Lake, noting that it merits recognition as a stand-alone national historic site.
- Several commenters on this subject also stressed that they would like to see the unit separated from the other sites of World War II Valor in the Pacific National Monument. Some of those commenting on this point noted that the Tule Lake Segregation Center history is distinct from the military focus of the other units in the national monument, and some stressed that the term “valor” is not appropriate to describe the unjust imprisonment of Nikkei during World War II.
- A small number of people stated their opposition to a name change.
- One commenter offered alternative options for the unit’s name, suggesting that the NPS consider including terms such as “Nikkei,” “Japanese American,” or “Incarceration.”

#### **PLANNING PROCESS**

- The majority of those commenting on the planning process thanked the NPS for the opportunity to share their thoughts about the Tule Lake Unit and the general management plan.
- Many people thanked the NPS for holding several public meetings to discuss the release of the plan and the opportunity for comment. A few commenters thanked

the NPS for holding some of its public meetings online, allowing for more convenient participation.

- Several commenters expressed concern that the NPS was presenting a different viewpoint about the airport and the unit boundary at public meetings outside the local community.
- Some commenters requested additional public meetings and an extended public comment period for the GMP/EA.
- One commenter asked the NPS to ensure that the implementation of alternative C is consistently informed by comments received from Tule Lake survivors both during scoping and public review of the plan.
- One commenter noted that there are very few national park units that focus on Asian Pacific American history and asked that the NPS ensure that the Tule Lake Unit receives as much support as possible.
- Several people thanked the NPS for safeguarding the nation’s history and for telling the stories of Tule Lake in particular.
- Several commenters thanked the NPS for its careful and transparent work in preparing the document and identifying realistic and feasible alternatives.

### *Substantive Comments on the GMP/EA and NPS Responses*

#### **ANALYSIS OF SUBSTANTIVE COMMENTS ON THE DRAFT PLAN**

Consistent with the requirements of 43 CFR 46 (46.305 (a) (1)), the NPS must consider all comments on the GMP/EA that are timely received. The standard NPS practice is to consider in the decision-making process all substantive comments that are submitted during the public review period.

Substantive comments are defined by Director’s Order 12, “Conservation Planning, Environmental Impact Analysis, and Decision-Making” (NPS 2015) as those comments that:

- question, with reasonable basis, the accuracy of the information in the GMP/EA;
- question, with reasonable basis, the adequacy of the environmental analysis;
- present reasonable alternatives other than those presented in the GMP/EA; or
- cause changes or revisions in the proposal

Substantive comments raise, debate, or question a point of fact or analysis.

#### **NPS RESPONSES TO COMMENTS**

All comments and suggestions were thoroughly considered and reviewed.

Comments that contain substantive and non-substantive points regarding information in the GMP/EA are summarized below. A concern statement has been developed to summarize the comment; in several cases similar comments are summarized by the same concern statement.

The NPS has responded to substantive comments raised by the public as part of finalizing the GMP/EA. These responses are included below. In general, the NPS responded to comments by:

- making factual corrections in the GMP/EA;
- supplementing, improving, or modifying the analysis and descriptions;
- modifying the alternatives;
- explaining why the comments do not warrant further response by citing sources, authorities, or reasons in support of the NPS position.

The NPS received many non-substantive comments and suggested technical and editorial corrections. Non-substantive comments in the table below include comments that are outside the scope of the plan, comments about lands that are outside the current Tule Lake Unit boundaries, comments about the planning process and compliance requirements, and other minor comments. Comments in favor of or against the preferred alternative or other alternatives, or those that only agree or disagree with NPS policy are not considered substantive. At the NPS's discretion, the NPS has provided responses to non-substantive comments. The technical corrections that resulted in a change to the GMP/EA or warranted a NPS response are included at the end of the table.

The following table organizes comments by topic in alphabetic order. Comments are noted as substantive (Sub) and non-substantive (Non).

Note: All page numbers refer to the *Tule Lake Unit General Management Plan and Environmental Assessment* November 2016 document.

***Comment and Response Table***

Sub/ Non	#	Concern Statement or Comment	Response
		<b>Alternatives</b>	
Non	1	Opposition to the NPS investing taxpayer dollars at Tule Lake. Alternative A is a minimally acceptable option. Suggest that the NPS invest resources in telling the incarceration story at Manzanar and Minidoka instead of investing in developing a third site.	The Tule Lake Unit of World War II Valor in the Pacific National Monument was designated a unit of the national park system by President George W. Bush through a presidential proclamation. The GMP acts on the presidential proclamation to fulfill the purpose and intent of the unit which is to preserve, interpret and enhance understanding of Tule Lake's unique history, which is different from Manzanar's or Minidoka's history.
		<b>Camp Tulelake</b>	
Sub	2	Suggest that the GMP include plans to develop a hiking trail at Camp Tulelake, which could be an important visitor draw.	The preferred alternative includes interpretive walking trails or paths in Phase 2.
		<b>Compliance</b>	
Non	3	The NPS has not fulfilled its Section 106 compliance obligations because the GMP does not analyze an alternative that includes a boundary expansion around the full historic camp footprint. Under Section 106, the GMP must evaluate the entire 6,110 acres as the Area of Potential Effect in its consideration of direct, indirect, and cumulative impacts on historic resources outside the monument boundaries.	The undertaking is the development of the plan. The plan adequately analyzed the resources that could be impacted as a result of implementing the plan. The Area of Potential Effect is the area within the boundaries of the Tule Lake Unit of World War II Valor in the Pacific National Monument, rather than the entire 6,110 acres that composed the Tule Lake Segregation Center during World War II. The NPS consulted with the SHPO on the undertaking and Area of Potential

Sub/ Non	#	Concern Statement or Comment	Response
			Effect. The SHPO did not state a concern about the determination of the Area of Potential Effect. The SHPO also stated that they have no objection to the NPS's proposed Finding of No Adverse Effect for the GMP. Additionally, Section 106 compliance will be conducted on specific projects as the plan is implemented.
Non	4	The preliminary determination of "no adverse effect" on page 97 is premature, given the narrow focus of the Area of Potential Effect and failure to identify the traditional cultural property district.	Comment noted. See responses to Comments 3 and 11.
		<b>Cultural Resources–Collections</b>	
Non	5	In addition to the scope of collections/museum management plan called for in the preferred alternative, suggest developing an internal inventory of all collections associated with the Japanese American incarceration, both real and digital, and accessibility for loan or display.	The collections are focused on the Tule Lake Unit. The NPS can collaborate with other institutions with collections; however it is outside the NPS's capacity and responsibility to address collections for all Japanese American incarceration sites.
Non	6	On page 160 it is stated that collections storage “would be greatly improved by installation of an insulated modular structure (IMS) within the silver garage. [...] An IMS is super-insulated and sealed to tightly control the infiltration and exfiltration of air.” In addition to adequate climate control, would the IMS also protect the collection from fire/water damage, and would the isolated location of this facility give	Insulated modular structures are climate-controlled, self-contained and lockable. The IMS would protect the collections from fire and water damage to the extent possible. An alarm system could be considered once the Silver Garage is upgraded and more detailed design and planning is conducted.

Sub/Non	#	Concern Statement or Comment	Response
		adequate protection from vandalism/theft? Would a tamper-proof alarm system be included?	
Non	7	Until such time as improvements are made to storage/curation facilities, can the NPS enter into a cooperative agreement with a local museum (Butte Valley Museum or Klamath County Museum) that is better equipped to store and protect the collection in the interim, to prevent further deterioration and provide greater protection?	It is desirable to keep the collection following management policies/secretary standards. The preferred alternative addresses this issue on page 77 of the GMP/EA.
		<b>Cultural Resources - Historic Features</b>	
Sub	8	Historic resources—for example tanks and tents—were identified during scoping as important features to include at the segregation center site, but they are not included in the plan.	On page 66 of the GMP/EA, tents in the stockade area are identified for delineation to illustrate overcrowded conditions. There is conflicting historical information about tanks at the Tule Lake Segregation Center, and more information is needed for accurate interpretation. The GMP does not preclude efforts to explore a tank being installed at the unit in the future.
Non	9	Suggest that the plan call for an inventory of intact segregation center barracks in the local community.	An archeological inventory of historic features, including historic barracks, associated with the Tule Lake Segregation Center was conducted by Jeff Burton in 2004 and 2005.
Sub	10	Some commenters favor using historic instead of reconstructed buildings; others are concerned about adapting historic buildings for visitor use and impacting the	The preferred alternative identifies uses for many of the historic buildings. This allows the NPS to fulfill its preservation and education mission by using

Sub/ Non	#	Concern Statement or Comment	Response
		integrity of the historic buildings.	historic buildings to serve park needs and as part of interpretive exhibits. Federal policy prescribes adaptive re-use of historic structures where operationally appropriate and economically prudent. Using historic structures prevents deterioration of historic structures. The NPS would follow the Secretary of Interior's standards for historic preservation for any work that is conducted on the historic structures. If the historic buildings are not used, they would be stabilized, at a minimum. If adaptive re-use is not feasible, reconstruction could be an option. The preferred alternative provides guidance for historic preservation treatments as well as reconstruction of character-defining features in the stockade area.
		<b>Cultural Resources - Values, Traditions, and Practices of Traditionally Associated Peoples</b>	
Sub	11	The entire historic footprint of the Tule Lake Segregation Center is eligible for inclusion as a traditional cultural property or district in the National Register of Historic Places, associated with significance to the Japanese American community. The NPS needs to undertake a traditional cultural property study in collaboration with the Japanese American community and respond to the deterioration and destruction	Generally, communities with traditional or cultural ties to a place initiate traditional cultural property studies. A traditional cultural property study could be initiated and undertaken by the Japanese American community or other communities that have traditional cultural relationships with the area. In the event that a study is conducted, the NPS could provide technical support.

Sub/ Non	#	Concern Statement or Comment	Response
		currently taking place on former segregation center lands.	
Non	12	Although the GMP calls for an ethnographic study of the unit to address Modoc history, the commenter suggests that this has already been achieved through Deur’s ethnographic overview for Lava Beds National Monument. While the NPS needs to ensure consultation with tribes and tribal involvement, ethnographic research should be focused on a traditional cultural property study with the JA community.	See response to Comment 11. Ethnographic studies would need further planning and scoping to identify what research has already been completed and what is still needed. This would be done in consultation with the tribes.
Non	13	The amount of money designated for oral histories is not large enough. Suggest that the NPS collaborate with other institutions.	Comment noted. The NPS would collaborate with other institutions related to oral histories.
Sub	14	Page 158 – Values, Traditions, and Practices of Traditionally Associated Peoples. The statement is made that “. . . the NPS would continue to engage Japanese Americans who were incarcerated during World War II and their descendants in documenting and preserving their history through the collection of oral histories and other means. However, with limited staff and the lack of a formal cultural resources program at the unit, opportunities to accomplish this work are severely curtailed.” Can National Park Service staff collaborate with volunteers or staff at other agencies to accomplish some of this work? The inability of the NPS to pursue such documentation might be	The quoted statement is the impact analysis for Alternative A, which is not the NPS preferred alternative. The NPS provides guidance for oral history collection in the preferred alternative on page 76–77 of the GMP/EA.

Sub/ Non	#	Concern Statement or Comment	Response
		<p>considered a significant adverse impact, because it would result in a permanent and irretrievable loss of important historical information. Once the opportunity to gather stories is gone, it can never be regained. Staff at NPS locations throughout the West and in other areas of the U.S. with large Nikkei populations (not just at the Tule Lake Unit) should be given the dedicated funding and resources to work on this important undertaking.</p>	
		<b>Foundation</b>	
Sub	15	<p>The plan should include more information about how incarcerated contributed to the Tule Lake Basin, for example through agricultural development.</p>	<p>The GMP provides overarching interpretive themes beginning on page 34. These themes will be further explored and developed in a long-range interpretive plan. More specific stories could be included as sub-themes and examples.</p>
Sub	16	<p>Add more information to the GMP about the Tule Lake draft resisters, Judge Goodman, and the controversy that still divides the Japanese American community over Tule Lake.</p>	<p>Comment noted. These are topics that could be included as sub-themes. The preferred alternative calls for a long-range interpretive plan that would develop additional sub-themes. These sub-themes could be included in exhibits and educational materials.</p>
Non	17	<p>Page 30 – 2. "Loyal or Disloyal. Suggest adding underlined text: "The <u>United States</u> government segregated persons..."</p>	<p>Edited as suggested. See errata.</p>
Sub	18	<p>Foundation: Page 30 – 3. Renunciation. Suggest adding underlined text: "The mass</p>	<p>Duress is described on page 15 in the park description and page 40 in the interpretive themes.</p>

Sub/ Non	#	Concern Statement or Comment	Response
		renunciation at Tule Lake was the largest renunciation of citizenship in U.S. history, <u>and it was made under duress.</u> ”	
Sub	19	Foundation: Page 30 – 6. Individuals and Communities. Are those who were repatriated to Japan from Tule Lake included as one of the communities? Will any attempt be made to gather their personal perspectives/stories?	Yes, their stories, experiences, and history are included in the theme and will be interpreted.
Non	20	Page 30 – 8. Historic Setting and Resource: The word “prehistoric” is included in this sentence, but it’s not clear to what this refers, particularly since the incarceration took place in times of recorded history. Explain that prehistoric occupation by native peoples is part of the story of the Tule Lake Unit.	The language is intended to encompass all human occupation at the site.
Non	21	Page 30 – 9. Tule Lake Landscape. Suggest adding underlined text: “The Tule Lake Segregation Center was set within a remote setting <u>with often severe weather, in an environment unfamiliar to those incarcerated there,</u> and it is surrounded by distinct land forms and vistas.”	Comment noted. Injustice, hardships and challenges experienced by Nikkei, and the environmental conditions are included in the significance statements and interpretive themes.
Non	22	Page 32 – Setting and Landscape. The phrase, “. . .the daily environmental conditions that Nikkei experienced at Tule Lake during World War II, which were also experienced by those who have called the Tule Lake Basin home for generations” is a serious misrepresentation, or at least highly incomplete. Post-WWII white	Comment noted. The conditions of confinement and the context of how people lived there profoundly impacted how people experienced the environmental conditions. The NPS will interpret these differences. There are opportunities for visitors to experience the environmental conditions and imagine these

Sub/ Non	#	Concern Statement or Comment	Response
		settlers did NOT experience the forced crowded living conditions, lack of privacy, and exposure to the elements that the incarcerated did. An across-the-board statement equating the experiences of various groups with respect to environmental conditions is utterly wrong.	different contexts.
Non	23	Page 33 – Natural Resources. Define the term “lacustrine soils.” Consider rephrasing to read, “. . .shells and sagebrush once used by Nikkei <u>for artistic creations.</u> ”	Change lacustrine to "lake bed soils." No change necessary to "artistic creations."
Sub	24	Pages 34–41 – Interpretive Themes. One major theme omitted from this section is the issue of Repatriation. Tule Lake played a major role in imprisoning and punishing Nikkei who expressed a desire to return or relocate to Japan.	Comment noted. The suggestions could be sub-themes under the primary themes of Injustice and Renunciation. Repatriation is already identified as a topic to be more fully developed. See response to Comment 16.
Sub	25	Page 34 – Injustice. Other possible topics: (1) The role of the Japanese American Citizens League (JACL) in demonizing dissenters and fomenting deep and lasting divisions within the Nikkei community, along with the organization’s subsequent apology for such actions. (2) The misuse of the words “internment” and “evacuation” by the U.S. government to soften the appearance of its unconstitutional actions. (3) The failure of the government to protect the assets of the Nikkei community in general, and the fact that later reparations did not fully compensate most for their economic losses.	Comment noted. See response to Comment 16.

Sub/ Non	#	Concern Statement or Comment	Response
Sub	26	<p>Page 35 – Tule Lake War Relocation Center to Segregation Center. Should the first list item begin with “<u>Site</u> selection...”? Another possible topic: The timing and construction of the Tule Lake jail and stockade. (This should include how Tule Lake director Raymond Best solicited and got agreement from inmate laborers to construct the Tule Lake jail, and the role that Jimi Yamaichi and his crew played in the construction and in delaying its completion as much as possible.)</p>	<p>Comment noted. See response to Comment 16.</p>
Sub	27	<p>Page 39 – Loyal or Disloyal. With respect to the fourth list item, family composition also played a factor in answering the questionnaire (such as in an Issei/Kibei/Nisei mixed marriage). With respect to the fifth list item, the role that the men in Block 42 played in leading the refusal. Another topic: How those in the segregation center were not allowed to pursue employment or educational opportunities outside the camp, as were those assigned to other centers.</p>	<p>Comment noted. See response to Comment 16.</p>
Sub	28	<p>Page 41 – Renunciation (continued). With respect to the last list item about attorney Wayne M. Collins: Include how some former Tule Lake incarcerated worked with Mr. Collins as part of the Tule Lake Defense Committee to help renunciants regain their citizenship.</p>	<p>Comment noted. See response to Comment 16.</p>

Sub/ Non	#	Concern Statement or Comment	Response
Non	29	Page 41- Relevancy. With respect to the first list item (similarities of Nikkei and Modoc experiences), see the paper entitled “Cowboys, Indians, and Aliens” by Andrea Ikeda: <a href="http://escholarship.org/uc/item/3f17j5nq">http://escholarship.org/uc/item/3f17j5nq</a>	Comment noted. See response to Comment 16.
Sub	30	Page 42 – Special Mandates and Administrative Commitments. Part of the land within the limits of the Tule Lake Unit, segregation center site, is owned by Caltrans. There is no discussion of any cooperative agreement between Caltrans and the NPS with respect to this property. Also, it might be helpful to discuss that Caltrans used to own more property within the unit (including the jail building), and how and when that was transferred to NPS ownership.	On page 46, column 2, paragraph 3, it is noted that the NPS would work collaboratively with Caltrans to manage the property. The description of historical landownership within the Tule Lake Unit is outside the scope of the GMP.
Non	31	Page 43 – Management Agreement with USFWS. Since the expiration of this agreement is on May 2, 2017, will it be renewed? If so, will any conditions/clauses be changed?	The preferred alternative calls for an update the management agreement.
Non	32	Page 43 – Designations, National Historic Landmark. The statement is made that, “On February 17, 2006, 42 acres of the Tule Lake Segregation Center were designated a NHL (recent mapping has revised the total acreage to 37 acres).” Was this due to an inaccuracy in the original mapping, or were the unit boundaries downsized? A five acre discrepancy is a large one, and must be explained more thoroughly.	Comment noted. The NHL map indicates the boundary includes 42 acres. Change sentence by deleting: "(recent mapping has revised the total acreage to 37 acres)."

Sub/Non	#	Concern Statement or Comment	Response
Non	33	<p>Page 43 – Designations, National Historic Landmark. Consider including the National Historic Landmark Nomination/Designation form (form without photos is at <a href="https://www.nps.gov/nhl/find/state_lists/ca/TuleLake.pdf">https://www.nps.gov/nhl/find/state_lists/ca/TuleLake.pdf</a>) as an appendix, and reference here. Separate this discussion into three paragraphs, with breaks at, “The boundaries of the NHL. . .” and “The Tule Lake Segregation Center qualifies for NHL status. . .” The description of NHL criteria is incomplete and not entirely accurate as written (The Tule Lake Segregation Center qualifies for NHL status under Criterion 1 and Criterion 4. Make sure that any reference to National Register qualification mentions characteristics specific to this process, and not to the NHL nomination.</p>	<p>Comment noted. More information on the NHL designation can be found at <a href="http://www.nps.gov/nhl">www.nps.gov/nhl</a>. Also, NHL criteria are described on page 194. No change necessary.</p>
Non	34	<p>Page 43 – Designations, California Historical Landmark (No. 850-2). Change the second sentence to say this: The historical marker reads, <u>“Tule Lake, May 1942, March 1946.</u> Tule Lake was one. . .” How did the marker come to include the inaccurate figure of 110,000 incarcerated, instead of the widely accepted figure of 120,000? Note this inaccuracy in the GMP/EA. Consider including the official California Historical Landmark document as an appendix, and reference here.</p>	<p>Edited as suggested. See errata. If readers would like more information about the California Historical Landmark and its decision to use 110,000 instead of 120,000, the NPS recommends that the commenter contact the California State Historic Preservation Office.</p>

Sub/Non	#	Concern Statement or Comment	Response
Non	35	Page 44 –Update the next to last sentence to read, “... recommending three structures as contributing to the site’s significance: ...” When does the NPS intend to submit the National Register nomination package to the SHPO?	Comment noted. The three structures contribute to the district. No change necessary. The national register nomination will be submitted no later than 2020.
Sub	36	The GMP does not adequately address how the Tule Lake Unit will interpret the CCC and POW history at Camp Tulelake, Modoc history, the history of the local community during the war, or the post-war establishment of Newell.	The interpretive themes address the local community. These aspects of the history will be included in interpretation, in the exhibits, and will be covered in more detail in the forthcoming long-range interpretive plan. Also see response to Comment 16.
		<b>Funding</b>	
Non	37	The GMP should describe the budget process that is needed to secure funds once an alternative is selected.	Describing the federal budget process is outside of the scope of the GMP. The NPS will follow the standard budget process for national park units.
Non	38	The funding discussion in the GMP should also address monetary and other contributions made by the Nikkei community to support Tule Lake restoration and development.	Page 50 mentions the use of non-federal partners for funding generally. The NPS recognizes that projects completed to date have included significant contributions from the Nikkei community and local community (carpenter shop and jail).
		<b>Implementation</b>	
Non	39	If alternative C is selected, suggest that the NPS provide a schedule for key action steps from 2017 onward.	Implementation over the preferred alternative will occur over many years. It is outside the scope of the GMP to provide a specific schedule for implementation. Additionally, implementation of the GMP is

Sub/Non	#	Concern Statement or Comment	Response
			contingent on funding.
Sub	40	While the three phases of the plan are clearly laid out, the timing for each phase is vague in the plan. The plan implies a goal of 10 years for completion of the three phases: if this is the case it should be clearly stated, even if it is described as an aspirational goal. The phasing of the plan and the projects associated with each phase are difficult to understand.	Comment noted. See response to Comment 39. If more description is needed, please contact the NPS.
Sub	41	It is important to emphasize that the next phase after an alternative is selected will be done in consultation with the Modoc of Oklahoma and Klamath Tribes, neighboring communities, Japanese American communities, and others.	Comment noted. Consultation will continue with implementation of the GMP. See pages 28, 80, 81 of the GMP/EA.
Non	42	Suggest that phases be organized more geographically: begin first with all projects at the segregation center, then work on Camp Tulelake, then work on the Peninsula.	Comment noted. No change made.
		<b>Interpretation/Education</b>	
Non	43	The GMP does not include enough provisions for education. Similarly, the digital emphasis for education under alternative C is good but should be more extensive.	Comment noted. The NPS seeks to conduct education programs and develop digital media to interpret Tule Lake's history, as well as partner with other entities. The level of program and projects is dependent on funding. Examples of educational and digital media for other related NPS sites can be seen Manzanar and Minidoka national historic sites.

Sub/ Non	#	Concern Statement or Comment	Response
Sub	44	The preferred alternative should propose a fourth phase that includes development and construction of a research and education facility. The NPS has the best collection of photographs and historical documents related to the incarceration at Tule Lake, and this should be maintained, augmented, and made available to researchers, survivors and family members, and interested members of the public.	The preferred alternative calls for a collections facility to be open to researchers, as well as an online system for remote access the collections. An additional facility and programming could be included in future planning efforts.
Non	45	Page xiv – Alternative C, NPS Preferred. Revise the following statement, “Interpretive and educational programs would focus on engaging youth <u>and on providing in-depth historical information for adults.</u> ” While educating young people about the history and significance of Tule Lake is tremendously important, it’s also critical to accommodate adults who want to learn more about their own family history at Tule Lake, or for those without such connections, to teach them about the history of the site.	While the preferred alternative states it would "focus on engaging youth," interpretive programs would seek to engage visitors of all ages. The NPS agrees that it is important to provide in-depth historical information, and that clause has been added to the preferred alternative concept. Information will be for both adult and youth use. Change to "...engaging youth and providing in-depth historical information. Technology and digital media..." in the abstract and on pages xiv and 65 of the GMP/EA.
Non	46	The preferred alternative should include teacher trainings as part of the program for education and interpretation.	On page 79, the following sentence has been added to the preferred alternative: "The NPS would conduct teacher trainings in partnership with educational entities."
		<b>Land Protection and Boundaries</b>	

Sub/ Non	#	Concern Statement or Comment	Response
Sub	47	<p>Alternative C does not go far enough in terms of protecting Tule Lake's resources and telling its important stories. The NPS should embrace a larger vision for the long term to acquire more of the historic segregation center and reconstruct or relocate historic structures. This will allow survivors and families to access the sites where they/their loved ones lived, and it will help provide visitors with a more accurate idea of what it was like to be incarcerated at Tule Lake.</p>	<p>The NPS recognizes that historic resources associated with the Tule Lake Segregation Center exist on private and public property outside the Tule Lake Unit. The NPS does not have jurisdiction or authority over private property or lands managed by other federal agencies. As stated on page 79, the NPS would explore collaborative relationships and partnerships with willing landowners, both public and private. The "Appendix C: Analysis of Boundary Adjustment and Land Protection Criteria" includes an analysis of the lands and resources associated with the Tule Lake Segregation Center outside the Tule Lake Unit boundary. On page 191, the NPS finds that a boundary modification is not feasible at this time. The NPS is not proposing a boundary modification in the GMP.</p>
Non	48	<p>Newell and Modoc County do not have preservation plans for the resources outside the monument boundary. Lands outside the NPS boundary are key to helping heal the historical trauma of incarcerated and their families. Suggested language for this statement: "Approval of any one of the proposed alternatives in this GMP/EA does not preclude the potential development and/or implementation of future preservation efforts and interpretation plans for the Tule Lake Relocation/Segregation</p>	<p>Comment noted. See response to Comment 47.</p>

Sub/ Non	#	Concern Statement or Comment	Response
		<p>Center." NIMBY (“not in my backyard”) sentiments are commonly encountered during the pursuit of necessary and valuable public projects, but they should not be the sole reason used for downscaling or deferring them. Federal agencies have a responsibility to give equal consideration to all sides of an issue; to balance the needs of affected property owners with the need for the project (which in this instance is critical in terms of preservation); to mediate and negotiate with affected parties; and to compensate any affected parties fairly and appropriately if negotiation to acquire easements or land is necessary.</p>	
Sub	49	<p>Stating a commitment to a future boundary expansion will enhance the NPS ability to take advantage of property acquisition opportunities and will help avoid adjacent incompatible land uses. The NPS should identify priority lands for acquisition to support resource protection.</p>	<p>Comment noted. See response to Comment 47.</p>
Sub	50	<p>Suggest that Tule Lake National Historic Site is created through congressional action that at the same time expands the boundary to the full expanse of the historic segregation center (including private lands, similar to Santa Monica Mountains National Recreation Area and Rosie the Riveter World War II Homefront National Historical Park). Need to</p>	<p>Comment noted. See response to Comment 47. Additionally, the NPS does not have the authority to identify the NPS as having first right of refusal for the property acquisition.</p>

Sub/Non	#	Concern Statement or Comment	Response
		then ensure that the NPS has a right of first refusal for private lands within the boundary.	
Sub	51	Suggest adding other federal lands (BLM, BOR, and FWS) to the NPS to be part of the monument, especially the segregation center dump on BLM land.	Comment noted. See response to Comment 47.
Sub	52	The GMP's failure to analyze a boundary expansion, federal acquisition of selected parcels, and relocation of inconsistent land uses is inadequate environmental analysis.	Comment noted. See response to Comment 47.
Non	53	The GMP states that the NPS would explore collaborative relationships/partnerships with willing landowners, but does not state how the agency would undertake these partnerships.	Comment noted. See response to Comment 47. The GMP is a programmatic document. Providing specific guidance for collaborative relationships and partnerships with local landowners will depend on many factors and is not within the scope of the GMP.
Sub	54	What is to stop the government from taking private land? Would like a guarantee that the NPS land will only remain at existing acreage. The term "willing sellers" isn't accurate, because the federal government puts so much regulatory pressure on landowners that they lose their businesses and are forced out. The NPS already has enough land and doesn't need access to more.	Comment noted. See response to Comment 47.
Sub	55	Concern that comments have been made at public meetings outside the local community that indicate that the NPS has intentions to expand	Comment noted. The NPS apologizes if our communication on these issues was not adequately clear. Response to Comments 47

Sub/Non	#	Concern Statement or Comment	Response
		unit boundaries and to gain access to private lands for tours and archeological excavations. Concern that the NPS is not being honest about its plans for the airport area—it seems that the NPS would like the area to be part of the national monument but is not stating it outright. There is also a difference between the way the NPS discussed the airport at public meetings within versus outside the local community.	and 88 are the NPS’s official agency responses on the topics of land protection and boundaries and the Tulelake Municipal Airport.
Sub	56	Boundary expansion is implied by alternatives B and C.	Comment noted. See response to Comment 47. The NPS is not proposing a boundary modification in the GMP.
Sub	57	There will be a loss of county and municipal tax revenue if private lands become federal through a boundary expansion.	Comment noted. See response to Comment 47. The NPS is not proposing a boundary modification in the GMP.
Sub	58	Supportive of most of alternative C, but very concerned about the statement in phase 3 that calls for a cadastral survey to define the boundaries with USFWS and local neighbors: concerned that the Tule Lake Committee will interfere with that process.	A cadastral survey is an impartial project that is necessary to define the Tule Lake Unit's boundaries.
Sub	59	Development within the historic footprint of the camp should be restricted in order to protect resources and integrity of the site for the long term. Some asked whether there is any protection for historic resources, especially buried resources, on private lands.	Comment noted. See response to Comment 47.
Non	60	There is concern that the GMP does not address the cemetery.	See response to Comment 47. The cemetery is outside the Tule Lake

Sub/ Non	#	Concern Statement or Comment	Response
		<p>Commenters asked if there any plans to include the cemetery in unit boundaries and conduct further research. The cemetery is now a dump, which is a desecration of a sacred area; ask that the NPS preferred alternative “recognize the cemetery site and address the past and current uses that defile the remains of those buried.” Suggest that the municipal dump be relocated. Suggest that unmarked graves in Linkville Cemetery be reexamined to compile a complete list.</p>	<p>Unit boundary, and therefore the NPS does not have jurisdiction over it. The location of the cemetery is unknown at this time. Questions and concerns about the cemetery are best directed to the landowner(s).</p>
Non	61	<p>Suggest that the NPS, at minimum, erect a monument at the site of the original cemetery with a list of the names of the 331 who died; doing nothing is a dishonor.</p>	<p>See response to Comment 47. The NPS intends to interpret the cemetery and history of those who died at the Tule Lake Segregation Center during World War II through exhibits and media located at the contact station/visitor center. The NPS does not have the authority to erect a monument at the cemetery location.</p>
Non	62	<p>Request that visitor access be provided to historic resources outside the boundary, for example the latrine slab.</p>	<p>Comment noted. See response to Comment 47.</p>
Sub	63	<p>Suggest that the plan include re-constructing an entire residential block, including barracks, latrine building, laundry building, and mess hall so that visitors can get a much more personal and accurate impression of the sparse and crowded living conditions at Tule Lake and the severe lack of privacy in the living quarters and</p>	<p>The NPS agrees that interpreting the living conditions is important to visitor understanding. The NPS intends to interpret the living conditions through onsite exhibits and through media. Additionally, the Tulelake-Butte Valley Fairgrounds has a residential barrack where they illustrate the living conditions in camp. It is</p>

Sub/ Non	#	Concern Statement or Comment	Response
		toilet/shower facilities.	NPS policy that reconstructions or other methods of returning buildings to sites are located in their original setting. Since the historical residential areas are outside NPS jurisdiction, the NPS cannot propose actions on those lands. The preferred alternative includes the reconstruction or returning of a historic barrack building in the stockade area. This barrack building could provide interior exhibits about the living conditions, which could be compared and contrasted between the living conditions in the stockade and the residential areas.
Non	64	Buried resources at the landfill site need to be protected. If the landfill is on BLM land, is there something we can do to protect it?	The landfill is afforded the same protections, according to laws and policies that all cultural resources have under federal ownership. The BLM would have cultural resource responsibilities for the landfill site.
Sub	65	Pages 156–58: Historic Structures and Cultural Landscapes (Impact Analysis). There is no relevant discussion of the affected cultural landscapes, a type of historic property whose values and characteristics have been not formally been identified in the context of the segregation center’s history and its importance as a traditional cultural property for Japanese Americans.	Comment noted. The area of potential effect was determined to be the area within the Tule Lake Unit. The SHPO has concurred with the NPS finding of no adverse effect for the area of potential effect. The GMP/EA document discusses Tule Lake Segregation Center resources on adjacent lands beginning on page 123 and in Appendix C: Analysis of Boundary Adjustment and Land Protection Criteria. Also see response to Comment 11.
		<b>Local Community</b>	

Sub/ Non	#	Concern Statement or Comment	Response
Sub	66	Commenters question the NPS conclusion that the Tule Lake Unit will benefit the local community.	Comment noted. The GMP/EA states that “Alternative C would result in substantial beneficial impacts on socioeconomics through increased visitation and travel-related spending” (page 170). This analysis is based on visitor spending data contained in the 2015 National Park Visitor Spending Effects report. For the Lava Beds National Monument, just over 100,000 visitors resulted in \$4,510,000 in visitor spending in gateway communities and created 62 jobs for an economic output (total estimated value of the production of goods and services supported by NPS visitor spending) of \$4,800,000. For the Tule Lake Unit, “the approval of the plan does not guarantee that the funding and staffing to implement the plan will be forthcoming” (page 50). There are many factors that will contribute to economic impacts as a result of the Tule Lake Unit, and the GMP/EA only provides projections based on neighboring or comparable national park units.
Non	67	Open up potential NPS training, full- or part-time employment, and volunteer opportunities to nearby residents in Newell and Tulelake. Positions could include docents, Spanish language interpreters, site security, facility construction and maintenance, and more (assuming federal employment constraints allow this).	The comment is outside the scope of the GMP; however the NPS provides opportunities for employment at Lava Beds National Monument and the Tule Lake Unit. Individuals need to apply. The NPS participates in local job fairs as available.

Sub/ Non	#	Concern Statement or Comment	Response
Sub	68	Suggest that the NPS conduct outreach to adjacent property owners and local residents to identify those who would welcome interaction with Tule Lake Unit visitors. Possible interactions could include joint visitor/resident forums and inviting interested local residents to participate in interpretive events.	Outreach to the local community is ongoing and will continue to occur during the implementation of the GMP. Further efforts to accommodate local interest in greater collaboration will be explored.
		<b>Name Change</b>	
Non	69	Implementation of the name and administrative change should rightfully occur without any supplemental restrictions, such as those included in House Resolution 4387 introduced in the 114th Congress.	The preferred alternative recommends a name change which would require congressional action. Congressional legislation, and not the NPS, would determine the name change and any additional legal or supplemental restrictions.
		<b>Natural Resources—Biological Resources, Wildlife and Wildlife Habitat</b>	
Sub	70	Pages 162–165. While there is mention of raptor species, there is no mention of other birds under the protection of the Migratory Bird Treaty Act (e.g. cliff swallows).	On page 207, the GMP provides servicewide laws, policies, desired conditions, and manage direction/strategies for ecological communities, which include migratory birds.
		<b>Natural Resources—Geologic and Soil Resources</b>	
Sub	71	Page 129. There is no mention of potential seismic concerns. A short paragraph should be included mentioning the fault zone in Modoc County and describing the potential for earthquake damage within the Tule Lake Unit.	On page 211, the GMP provides servicewide laws, policies, desired conditions, and manage direction/strategies for geologic resources. The GMP states the NPS would partner with USGS to identify, address, and monitor geologic hazards.

Sub/Non	#	Concern Statement or Comment	Response
		<b>Partnerships</b>	
Sub	72	Page 50 – One-Time Costs (3rd paragraph). The statement is made that, “Projects could be jointly funded through partnerships.” What types of partnerships, and with what agencies or organizations? An essential part of the planning process is identifying potential funding sources and partnerships.	The NPS has identified several stakeholder agencies and organizations that could provide assistance and will continue to identify further opportunities on an ongoing basis. Maintaining, developing, and creating new partnerships is ongoing.
Non	73	The GMP/EA should codify NPS support for the Tule Lake Pilgrimage. Pilgrimage support was articulated in the GMP for Manzanar National Historic Site, and this has helped the park partner with the Manzanar Committee.	NPS support for the Tule Lake Pilgrimage is stated on page 65.
Sub	74	Suggest partnering with other agencies to help pay for building restoration at Camp Tulelake, for example Department of Defense because it was a POW camp.	The NPS is open to government and non-governmental partnerships for project funding.
		<b>Peninsula</b>	
Sub	75	Please consider an alternative that opens Castle Rock/the Peninsula to public access.	The USFWS administers the Peninsula. It is closed to public access, except by permit. The NPS does not have the authority to change public access. While the NPS together with the USFWS considered an alternative that provides public access to the Peninsula, due to the sensitivity of the resources on the site and the need for additional coordination with stakeholders to work through these constraints, this alternative was not selected for implementation. However, as

Sub/Non	#	Concern Statement or Comment	Response
			stated on page 75, the preferred alternative calls for a USFWS-led or joint USFWS/NPS public planning process to explore changes to the public access to the Peninsula in the future.
Sub	76	Commenters asked if there any plans to include the former hog farm in unit boundaries.	The former hog farm is within the Tule Lake Unit's Peninsula parcel. The NPS is treating the hog farm area as an archeological site. In the preferred alternative, the NPS would inventory and evaluate the archeological resources and manage them for their historic value.
Sub	77	Public access to the Peninsula should be allowed for Modoc descendants, the local community, and visitors.	See response to Comment 75. Federal laws and policies do not restrict access to tribal members for sacred activities on public lands.
Sub	78	The Peninsula is a cherished amenity to local community members as well as to the Japanese American community: concerned that access is restricted for neighbors but selectively allowed for events honoring the incarceration.	Individuals wanting to access the Peninsula can participate in a guided tour offered by the NPS through their special use permit with USFWS. Additionally, individuals can contact USFWS to request a special use permit.
Sub	79	The Peninsula should be closed to public access until tribal consultation has been conducted by the NPS and the U.S. Fish and Wildlife Service.	The NPS has consulted with the Modoc Tribe of Oklahoma on this topic. Public access is only allowed through a special use permit from the USFWS.
Sub	80	Do not provide open, unlimited access to the Peninsula due to concerns about potential vandalism, potential damage to sensitive cultural and natural	Comment noted.

Sub/Non	#	Concern Statement or Comment	Response
		resources, strain on NPS resources/staff, and potential safety hazards, in particular in areas with sheer cliffs.	
Sub	81	To balance visitor access to the Peninsula with protection of resources, suggest offering more frequent, regularly scheduled, ranger-led tours that are open to all visitors. The NPS could also offer periodic guided tours to groups with specific interests and access needs.	As stated on page 74, the preferred alternative allows for increasing the frequency and routes, however this would need to be allowed through a special use permit from USFWS.
		<b>Planning Process</b>	
Non	82	There was no indication that the GMP would be over 200 pages long. It should be reduced to 25 pages total.	This is a comprehensive long-range plan and environmental assessment document that fulfills NPS policy requirements and NEPA and Section 106 compliance. The length of the document conforms with these requirements and provides the level of guidance necessary and appropriate for the Tule Lake Unit. The executive summary is 15 pages long, if a reduced number of pages and level of information is desired.
Non	83	The GMP is a biased document that is attempting to persuade the public to support alternative C without adequate description of the impacts to the local community.	The NPS used a logical and trackable decision-making process to identify a preferred alternative that fulfills the purposes of the Tule Lake Unit. This determination was based on agency priorities and considered issues and concerns raised during the public scoping process. The environmental analysis includes a section on potential impacts to

Sub/ Non	#	Concern Statement or Comment	Response
			the local community in the socioeconomic analysis on page 169. It is important to note that the GMP is a programmatic document and implementation will occur over many years. The NPS will continue to communicate and collaborate with neighbors and the interested public during the implementation of the GMP.
Non	84	Please include quotes from the public meeting comments in the summary of public comments and make them publicly available.	All of the public comments were reviewed and considered in the development of the GMP. The comments from public meetings are available at: <a href="http://parkplanning.nps.gov/TuleLakeGMPEA">parkplanning.nps.gov/TuleLakeGMPEA</a>
Sub	85	Since a large percentage of the current population in the Newell-Tulelake vicinity is Spanish-speaking, consider conducting at least one local public meeting or outreach effort in Spanish and making project information (or at a minimum, interpretation services) available in Spanish.	Scoping meeting announcements were provided locally in Spanish to reach Spanish speakers. There has not been a response to this GMP effort from Spanish speakers in the Newell-Tulelake area. The NPS has a bilingual (Spanish) ranger on staff at the Lava Beds and Tule Lake Unit in the event that there is a need for interpretation services for the Tule Lake Unit.
Non	86	Page 28 – Next Steps in the Planning Process. The information in this section and on page 15 of the NPS’s Fall 2016 Newsletter #3 mentions the (“draft”) GMP/EA and the associated public review and comment period, but does not include any information about the status of the GMP/EA after the close of public comments. Does the	The next steps in the planning process after the review of the GMP/EA, were outlined on page 28 of the GMP/EA document and on pages 14 and 15 of the summary newsletter. The NPS provides this comment and response section, the errata to the GMP/EA document, and FONSI as the final completion of the

Sub/ Non	#	Concern Statement or Comment	Response
		National Park Service intend to prepare an updated GMP/EA with all relevant planning information (including corrections to the Nov. 2016 “draft” GMP/EA, the approved FONSI, a summary of the public review process, and description of how comments were addressed)? Does the NPS’s environmental review process include preparation and distribution of a Notice of Availability (NOA) of a FONSI?	planning process. Issuing a notice of availability in the <i>Federal Register</i> or preparing a "final" EA are not part of the completion process.
		<b>Segregation Center Site</b>	
Sub	87	Memorial: It was suggested that the NPS erect a memorial to honor all those who were incarcerated, inscribed with the name of each prisoner. Additional memorials were suggested for those who were born and died at Tule Lake, resisters who were sent to Camp Tulelake, those sent to detention centers, and those who served in the military.	The development of memorials in national park units is guided by management policies. The installation of a memorial would need to be approved by the Director or through Congressional legislation.
		<b>Tulelake Municipal Airport</b>	
Non	88	The Tulelake Municipal Airport is a vital community resource that needs to continue operations unhindered. The agricultural operations supported by the airport are critical to sustaining the local economy and agricultural way of life. The airport has operated on this site for more than six decades, and it is one of the largest employers in Modoc County. The airport is also used for emergency services and firefighting planes.	The Tulelake Municipal Airport is not within the unit's boundary or NPS jurisdiction. The NPS is not proposing a boundary modification to include the Tulelake Municipal Airport land in the GMP. As stated on page 79, the NPS would explore collaborative relationships and partnerships with willing landowners, both public and private. Questions and concerns about the Tulelake Municipal

Sub/ Non	#	Concern Statement or Comment	Response
			Airport are best directed to Modoc County who has jurisdiction over the Tulelake Municipal Airport.
Non	89	Modoc County Ordinance Code 8.28.010 protects agricultural operations in the event they become the subjects of nuisance complaints from adjacent, non-agricultural land uses.	Comment noted.
Non	90	The airport fence is required by the FAA for safety reasons. People on the airport site (for example, visitors), pose a safety hazard and should not be allowed.	The actions relating to the airport are not within the scope of the GMP or NPS jurisdiction. See response to Comment 88.
Non	91	Suggest that the fence size and/or configuration be changed to be less impactful. The airport fence could follow the historical fence alignment around the segregation center boundary, or it could be smaller.	Comment noted. This comment is outside the scope of the GMP. See response to Comment 88. The FAA and the Modoc County are conducting a planning effort for the fence and modifications to the airport which will be conducted through federal compliance processes.
Sub	92	The soundscape protection measures called for in Alternative C would curtail necessary airport operations.	The preferred alternative calls for a soundscape management plan on page 84 that would cover the areas within the Tule Lake Unit for which the NPS has jurisdiction. The historic soundscape associated with the Tule Lake Segregation Center and Camp Tulelake would have been filled with human-caused sounds. The Peninsula would have had a more natural soundscape. The intent of soundscape management is to maintain levels of noise within the NPS managed areas

Sub/ Non	#	Concern Statement or Comment	Response
			that are consistent with the historic soundscapes of those areas. The soundscape mitigation measures and management strategies on page 209 cover NPS activities and would not affect the airport, since the NPS does not have jurisdiction on the airport lands. The FAA oversees conflicts associated with overflights and soundscapes. Additionally, soundscapes has been dismissed as an impact topic, since no action proposed in the alternatives in this GMP would have more than a slight, imperceptible effect on the overall sound levels.
Non	93	The Tulelake Municipal Airport represents a land use that is incompatible to the national monument, and the airport should be moved to protect the integrity of the historic segregation center.	Comment noted. This comment is outside the scope of the GMP. See response to Comment 88.
Non	94	The presence of the airport is disrespectful to what happened at Tule Lake and impedes families/visitors from accessing the site where their loved ones were incarcerated. Please explore mutually beneficial solutions that might allow relocation of the Tulelake Municipal Airport to a nearby site so that the full footprint of the Tule Lake Segregation Center could be preserved in its entirety. Resources such as remnant red gravel roads and building foundations are still visible in the area and can be experienced. On page 32 (Fundamental Resources	Comment noted. This comment is outside the scope of the GMP. See response to Comment 88.

Sub/ Non	#	Concern Statement or Comment	Response
		and Values), the statement at the top of the page, “If fundamental resources and values are allowed to deteriorate, the park purpose and/or significance could be jeopardized,” is critical to understanding the Japanese-American community’s opposition to airport operations and potential expansion on the site of the Tule Lake Segregation Center. Irreplaceable resources are currently unprotected and at risk of damage from erosion or vandalism.	
Non	95	The GMP does not address the airport's existence in the middle of the historic camp footprint, nor does it discuss the future plan to build a fence around the airport.	Comment noted. The GMP document contains several descriptions and references to the existence of the Tulelake Municipal Airport, and its location on what was the residential area of the camp. This comment about the fence is outside the scope of the GMP. See response to Comment 88.
Non	96	The GMP should include moving the airport as an aspirational future goal.	Comment noted. This comment is outside the scope of the GMP. See response to Comment 88.
Non	97	The NPS and the airport should work together to allow access for tours—perhaps through the development of an agreement that allows special events and visitor access at certain times.	Comment noted. See response to Comment 88.
		<b>US Fish and Wildlife Service</b>	
Non	98	The GMP/EA doesn’t identify the National Park Service as the NEPA lead agency, nor does it clarify the official role of the U.S. Fish and Wildlife Service. Is USFWS a	The GMP/EA was developed by an interdisciplinary team that also included USFWS representation and interagency coordination. The NPS consulted with USFWS

Sub/ Non	#	Concern Statement or Comment	Response
		cooperating agency under NEPA, and were they officially invited to participate as such?	extensively in the course of the plan's development. In the management agreement between the NPS and USFWS, it was agreed that the NPS would be the lead agency for this GMP. The USFWS stated their support for the actions in the GMP/EA for Camp Tulelake and the Peninsula and concurred with the issuance of the FONSI.
Non	99	Commenters object to any consideration of a management agreement between the National Park Service and the U.S. Fish and Wildlife Service, or any other federal agency, as it relates to the proposed location(s) contained within the GMP.	Comment noted. The presidential proclamation establishing the Tule Lake Unit of World War II Valor in the Pacific National Monument directed the co-management of the Peninsula and Camp Tulelake by the NPS and USFWS.
		<b>Visitor Facilities</b>	
Non	100	More resources should be targeted toward the visitor center to allow for a larger space than proposed by alternative C. Concern that both the ditch rider house and the carpenter shop are too small for a visitor center/exhibit space.	The carpenter shop has over 2,200 square feet of space, which together with the interpretive exhibits in the jail, stockade, and additional stockade barrack would provide ample space for high-quality exhibits and visitor learning. Using historic structures prevents their deterioration, follows federal policies, and can be more cost effective than new construction. In an era of rapidly evolving technology and fiscal restraint, the National Park Service is looking for innovative ways to interpret Tule Lake's history for contemporary and future generations.

Sub/ Non	#	Concern Statement or Comment	Response
Sub	101	The visitor center should be large enough to accommodate a theater as well as large bus tours, such as those that arrive at Manzanar. Concern that the carpenter shop is not adequately sized to meet these needs.	Comment noted. The preferred alternative includes a film about the Tule Lake Unit, which will be shown onsite in a location that can accommodate it. More detailed facility and space planning will occur as the GMP is implemented.
Sub	102	Ditch rider house seems very small: suggest using the carpenter shop as a visitor contact station from the outset. Another reason to use the carpenter shop first is to avoid moving the visitor center between phase 1 and phase 2.	The adaptive use of the carpenter shop could take many years to plan, receive funding, and be completed. In the interim, it is important to fulfill the immediate need for onsite interpretation and education.
Sub	103	Page xiv – Phase 2. The GMP states, “The ditch rider house could remain for operational support until no longer needed, at which time it could be removed.” Does “removed” mean demolished, or relocated to another site? Even though this structure is not considered historic (per National Register criteria), it’s still one of the original structures from the Tule Lake Segregation Center, and as such should be preserved and reused if possible, particularly since so few of the original center buildings remain. What about the possibility of making the ditch rider houses a combined NPS store and interpretive center for children/youth, while dedicating the carpenter shop to adult interpretation and research use? Even if immediate plans don’t include a permanent use of the building, please consider preserving	The preferred alternative's guidance for the ditch rider house, after the carpenter shop is converted to the primary visitor facility, is open-ended. The NPS would consider the future use and treatment of the ditch rider house in the context of the other historic structures. It could serve a future function, or it could be removed. More detailed facility and space planning will occur as the GMP is implemented.

Sub/ Non	#	Concern Statement or Comment	Response
		it for the future.	
Non	104	The three sites that comprise the unit are distant from one another and need better signage and connectivity. The configuration of the unit and its different sections feels fragmented and can be confusing.	The configuration of the Tule Lake Unit is a result of its designation by presidential proclamation. On page 85, the preferred alternative has been revised to include a signage and wayfinding plan.
Non	105	Recommend that the Tule Lake Memorial plaque on Highway 139 be moved to a more prominent location (the future visitor center location/carpenter shop area was suggested by one commenter).	The plaque is the property of Caltrans. The NPS would work with Caltrans to maintain it. If Caltrans wanted to move it to a more prominent location, we could work with them to do so.
Non	106	Page 24 – Energy Requirements and Conservation Potential. Are the additional energy requirements of new visitor facilities expected to be met through the use of solar or wind power? Will they be self-sustaining or connected to the local power grid? Who is the local electrical and gas provider? Will the decision on power supply and a more in-depth discussion of this topic be deferred to the time that specific project-based environmental analysis for the Tule Lake Unit is prepared? Suggest that alternative energy and water resources (for example, wind, solar, and grey water re-use) be included in the design of facilities to lessen the environmental impact of the unit.	On page 212, the GMP provides servicewide laws, policies, desired conditions, and management direction/strategies for climate change, sustainability, and sustainable facility design. More detailed facility and infrastructure planning and compliance will occur on a project-by-project basis.

## Technical Corrections

Comment	Response
<b>Technical Corrections</b>	
<p>Page 1 – Location, Access, and Setting (1st paragraph). The elevation of the Tule Lake Unit is given as 4,033 feet [above sea level?], but all three components can't have the exact same elevation. If 4,033 feet is the elevation of the segregation center, the peak elevation of the Peninsula must be much higher, and Camp Tulelake is likely at a different elevation too.</p>	<p>Comment noted. On page 1, change to "The segregation center of the Tule Lake Unit sits at an elevation of 4,033 feet in the Tule Lake Basin..."</p>
<p>Page 1 – Location, Access, and Setting (2nd paragraph). This paragraph (and other text in the GMP/EA) states that Camp Tulelake was constructed within the Tule Lake National Wildlife Refuge, but mapping in the document (Figure 1, Figure 2, other?) appears to show the camp as being disconnected from and outside of the National Wildlife Refuge limits.</p>	<p>Statement is accurate. No change necessary. This parcel was an isolated unit, but was part of the refuge.</p>
<p>Page 3 – Figure 2. This figure states that the “Historic Segregation Center” encompassed 6,110 acres. (This number was also used on page 8, page 106, page 137, page 192, page 195, and page 196/Figure 14.) What was the source of this acreage? According to one of the sources cited in the GMP/EA bibliography (Burton et al., <i>Confinement and Ethnicity</i>, page 279), the segregation center and associated farmland totaled 7,400 acres. The NPS’s Tule Lake Segregation Center National Historic Landmark Nomination (<a href="https://www.nps.gov/nhl/find/statelists/ca/TuleLake.pdf">https://www.nps.gov/nhl/find/statelists/ca/TuleLake.pdf</a>), page 4 also states that, “The segregation center historically comprised 7,400 acres.”</p>	<p>NPS recognizes the discrepancies in acreage figures. See page 192 for a discussion of acreage.</p>
<p>Page 4 – Historical Background (1st paragraph). Change to “By 1940, roughly two-thirds of ethnic Japanese living in the U.S. was American-born citizens.”</p>	<p>Edited as suggested. See errata.</p>
<p>Page 4 – Historical Background (2nd paragraph). “On December 7, 1941, Japan bombed Pearl Harbor...” (to remove any implied/inferred connection with ethnic Japanese in the United States). “Although the orders were directed toward all “enemy aliens,” they were predominantly applied to Japanese immigrant Issei and not to immigrants from other enemy nations such as</p>	<p>Comment noted. Changed "Japanese bombed Pearl Harbor" to "Japan bombed Pearl Harbor" on page 4. No change made regarding second suggestion. Some immigrants from Germany</p>

Germany and Italy.”	and Italy were subject to internment.
Page 8 – Historical Background, continued (only full paragraph on page). It’s important to note here that U.S. immigration laws did not allow Japanese immigrants to become naturalized citizens; therefore, disavowing allegiance to Japan would have left them stateless.	Comment noted. No change made. The scope of the historical background is meant to be brief. The reasons and implications of responses to the questionnaires are complex and will be further elaborated in educational and interpretive materials and media.
Page 11 – Figure 4. Show the location of the original camp cemetery. The central facility buildings are missing in Block 35. Label features already shown on the figure (particularly those discussed throughout the document): the jail building, the ditch-rider house, the carpenter shop, the blue and silver garages, the warehouse, the original and post-segregation entrances, the two fire stations, and the still-standing Imhoff tanks. It looks like the former guard tower locations are marked, but they aren’t labeled or included in the legend. What are the official boundaries of the community of Newell as applicable to this map?	Comment noted. Change made to the cemetery and Block 35. Figure 4 labels the historic features on the segregation center site. The guard towers locations are shown similar to the other building locations. The purpose of Figure 4 is meant to show the historic features overlaid on the contemporary landscape. It is not meant to show the boundary of the town of Newell.
Page 16 – Historical Background (2nd paragraph on page). It deserves mention that Japanese Americans were not allowed to participate in the homesteading program, which favored white immigrants. Nisei veterans of WWII were also excluded from this program.	Comment noted. NPS will use historical research to better interpret this story.
Page 18 – General Management Plans . "...analysis for GMPs is typically a programmatic, or broad-scale analysis, rather than a <u>project-specific</u> analysis.” (GMPs are by nature site-specific, to the Tule Lake Unit in this instance.)	Edited as suggested. See errata.
Page 18 – Purpose of the Plan. “The new general	Implementation of the GMP

<p>management plan will set the management philosophy for the Tule Lake Unit for the next 20 years or longer.” How much longer than 20 years can a GMP be in effect, and does the NPS have a standard or mandatory timeframe for development of an updated GMP?</p>	<p>would occur over many years and is dependent on funding. The NPS does not have a mandatory time frame for GMPs.</p>
<p>Page 19 – Need for a Plan (2nd paragraph). Is a copy of the Strategic Plan for Lava Beds National Monument and the Tule Lake Unit: 2015–2020 publicly available? How can a copy be obtained?</p>	<p>If you'd like a copy, please contact the park at <a href="mailto:tule_superintendent@nps.gov">tule_superintendent@nps.gov</a></p>
<p>Page 20 – Historic Resources. “National Register” should be capitalized.</p>	<p>Comment noted. No change made. National Register of Historic Places is capitalized, whereas national register is not.</p>
<p>Page 21 – Management Designation. It would be helpful to explain how the current designation is “confusing and offensive to some visitors and stakeholders.”</p>	<p>On page 21, add "For many people, how the government treated Japanese Americans was not considered valorous. Also, the unit is geographically and thematically distant from the other units."</p>
<p>Page 21, “Issues and Concerns Not Addressed”: please cite the primary issues and reasons for not addressing them.</p>	<p>Generally, they are issues and concerns that are outside the scope of the GMP.</p>
<p>Page 21- Boundaries, Adjacent Lands, and the Local Community. “... that convey the Tule Lake Unit’s historic visual quality.”</p>	<p>Edited as suggested. See errata.</p>
<p>Page 24 – Greenhouse Gas Emissions. Fourth sentence should read, “Construction projects would be minimal, short-term, and would not result in any long-term adverse impacts from increasing greenhouse <u>gas</u> emissions.”</p>	<p>Edited as suggested. See errata.</p>
<p>Page 25 – Public Health and Safety. Although there are no adverse effects from any of the proposed alternatives, there are still other health and safety concerns. What about the need for potential rapid response by emergency medical teams and law enforcement personnel in isolated areas, particularly</p>	<p>Comment noted. Safety and security are a high priority. NPS will continue current partnerships with emergency services. See page 49. The preferred</p>

<p>with an expected increase in visitors? Will all NPS staffers be appropriately trained to respond to such emergencies? Will an interagency communication plan be implemented to facilitate prompt coordination and response, and will the technologies (cell phone service, radio coverage, medical evacuation vehicles) be sufficient to handle necessary communication and transport? These questions should be considered during GMP/EA development and also during the environmental planning process for later project implementation.</p>	<p>alternative calls for an emergency management system plan on page 84.</p>
<p>Page 26 – Draft Accessibility Plan (2014). Is this plan prepared pursuant to the requirements of the Americans with Disabilities Act? If so, state this. Also, change the last sentence to read, “The <u>Final Accessibility Plan</u> is underway, <u>and is expected to be completed in [year].</u>”</p>	<p>Comment noted. The plan is still underway. The NPS will comply with the Americans with Disabilities Act and Architectural Barriers Act in all implementation projects.</p>
<p>Page 26 – Tule Lake Interim Asset Use Management Plan. Change the first sentence to read, “. . .until they can be documented, protected, and stabilized.” (Eliminate the word “and” in front of “protected.”) Is the 2013 version of the plan the last one intended before approval of the GMP/EA?</p>	<p>Edited as suggested. See errata.</p>
<p>Page 27 – Comprehensive Conservation Plan. Change the parenthetical part of the title to “(In Progress). Include the acronym (EIS) behind the words “environmental impact statement.” When is the draft EIS expected to be available for public review and comment?</p>	<p>On page 27, change text to "Comprehensive Conservation Plan (2017) The USFWS has completed a comprehensive conservation plan. . ." Please contact USFWS for more information.</p>
<p>Page 27 – Local and Regional Plans. What (if any) sections of the Modoc County General Plan and the Siskiyou County General Plan specifically address elements contained in the Tule Lake Unit, and what is the specific text of those parts of the plans? When these plans were approved, and when are they due for updates?</p>	<p>Please contact the counties for more information.</p>
<p>Page 27 – Modoc Volcanic Scenic Byway Plan. What is the correct official name of this byway? (Some sources, including the U.S. Forest Service, list it as the “Modoc</p>	<p>Edited as suggested. See errata. Please contact Volcanic Legacy Scenic</p>

<p>Volcanic <u>National Scenic Byway</u>.”) What state and/or local highways are included in the byway? Where does it begin and end, and how many miles long is it? Does it include stretches of highway adjacent to the boundaries of the three elements of the Tule Lake Unit? When was the byway plan approved? This information is needed to give the reader a picture of why the byway is relevant to the GMP/EA.</p>	<p>Highway for more information on the byway.</p>
<p>Page 27 – U.S. Fish and Wildlife Plans. Change this heading to “U.S. Fish and Wildlife <u>Service</u> Plans.”</p>	<p>Edited as suggested. See errata.</p>
<p>Page 32 – Historic Sites, Archeological Features, and Artifacts. Slight revision of punctuation and wording: “These sites and features presently include, but are not limited to, the segregation center’s jail; the carpenter shop; the sites of the stockade, motor pool, post engineer’s yard; the Peninsula; and the Camp Tulelake area.”</p>	<p>Edited as suggested. See errata.</p>
<p>Under “Land Protection and Boundaries” (p. 49), first paragraph should be clarified regarding what criteria were deemed not feasible.</p>	<p>See Appendix C.</p>
<p>Page 49 – Strategies to Address Climate Change. Capitalize “<u>Appendix D</u>.”</p>	<p>Edited as suggested. See errata.</p>
<p>Page 55 – Park Operations. This subheading is inconsistent with the one used on page xi of the Executive Summary (“Unit Operations”). The second paragraph in this section is missing a sentence that was included in the Executive Summary: “Most positions would be shared with Lava Beds National Monument.”</p>	<p>Change to "Unit Operations" and add “Most positions would be shared with Lava Beds National Monument"</p>
<p>Page 57 – Management of Specific Areas. . . Tule Lake Segregation Center. The statement is made that, “The Tulelake Irrigation District (TID) storage area would be cleaned of hazardous materials.” This area is not shown on any figures, and should be. (Appropriate place would be Figure 5.)</p>	<p>Add "Tulelake Irrigation District (TID)" to Figure 5.</p>
<p>Page 62 – Park Operations and Facilities. This heading isn’t consistent with that used on page xiv in the Executive Summary (“Unit Operations and Facilities).</p>	<p>Change to "Unit Operations"</p>

<p>Page 70 – Phase 2. The second paragraph mentions “historic trees along SR 139.” What species was planted? When were they planted (during the camp’s years of operation)? When were they removed? Would TID be responsible for the cost of hazardous waste cleanup?</p>	<p>Comment noted. A cultural landscape inventory will help answer these questions. NPS will bear the cost of hazardous waste cleanup or determine who the responsible entity is.</p>
<p>Page 73 – Figure 11. The shop building is shown in red, indicating work would be done on it under Phase 1, but no description of work on the shop is given in the Phase 1 list of work. The list of Phase 1 work includes, “Install vault toilet,” but the proposed location of this toilet isn’t shown on the figure. The list of Phase 2 work includes, “. . .parking, associated roads, + trails (location TBD),” but it might be helpful to show potential approximate locations on the figure.</p>	<p>Comment noted. "Mess Hall + Shop: stabilize" is listed as the action, and it is included in the cost estimates. Location of vault toilet and other projects would be determined through specific project planning.</p>
<p>Page 77 – Natural Resources. The first paragraph under this subheading states, “The NPS would inventory natural resources in the three sites. . .” but this section deals specifically with the Peninsula, not with the other two components of the Tule Lake Unit. No mention is made here or in the rest of this subsection about the raptor and swallow nesting activity on the Peninsula, and measures that could be implemented to protect migratory bird species.</p>	<p>Comment noted. The statement on page 77 is not specific to the Peninsula.</p>
<p>Page 78 – Visual and Scenic Resources. It’s also important to consider other human-built features that might have an adverse impact on viewsheds in and near the Tule Lake Unit, such as artificial lighting, intrusive/large signage, additional fencing, etc.</p>	<p>Comment noted. On page 209, the GMP provides servicewide laws, policies, desired conditions, and management direction for lightscape management and dark night skies.</p>
<p>Page 80 – Table 3.5 The total under the column heading “Admin” is incorrect: \$196,000 - \$23,000 = \$173,000.</p>	<p>Comment noted. Change "\$172,000" to "\$173,000"</p>
<p>Page 84 - Action Plans and Studies. One of the items listed is "Hazardous materials survey at Camp Tulelake," but nothing is mentioned about conducting a hazardous waste study for the segregation center area. A planned action under Alternative C is to clean the Tulelake Irrigation District (TID) storage area of</p>	<p>A hazardous waste study has already been completed. The NPS will determine who is responsible for the cleanup.</p>

<p>hazardous materials (see Page 57, Tule Lake Segregation Center). Has a study for this storage area already been conducted, and are all the contaminants known? Who would be financially responsible for such a study; TID or NPS?</p>	
<p>Page 84 - Action Plans and Studies: Would a low-level traffic and circulation study be needed during the planning for upgrades such as the left turn lane on State Route 139 and the new visitor parking area (both tied to the segregation center site)?</p>	<p>Parking will be limited to available space. Left turn lane will be a CalTrans decision.</p>
<p>Page 90 -Table 3.8: Summary of Costs. The subtotal given for "One Time NPS Costs -Alt. C: Preferred Phase 3" (\$3,733,000) should be \$3,825,000. That also affects the Total One-Time NPS and USFWS Costs -Alt. C: Preferred Phase 3" which should be \$4,009,000 instead of \$3,917,000. If \$92,000 represents NPS's 50% share of contributions for the Peninsula, shouldn't the same amount be shown for USFWS? Does the \$371,000 contribution for USFWS include the \$92,000 as well as fund for other things? If so, break that down in the table to clarify.</p>	<p>Comment noted. Change "\$3,733,000" to "\$3,825,000" and "\$4,009,000" to "\$3,917,000." USWFS would continue to contribute funding and staffing toward the management of the Peninsula.</p>
<p>Page 92 - User Capacity (1st paragraph). The first sentence in this section ("General management plans are required to identify and contain user capacities for all areas of a park.") differs slightly from that on page xx ("General management plans are required to identify and implement user capacities ... ) The NPS definition of "user capacity" is also slightly different. Is this consequential?</p>	<p>Comment noted. It is not consequential.</p>
<p>Page 95 – Table 3.9. Under indicator 1, another management action could be, “Design and install paved pathways to selected Tule Lake Unit resources, to improve accessibility and to limit pedestrian travel to designated areas.” For indicator 2, consider another management action: <u>Install small signs warning that disturbance of cultural sites or removal of artifacts is a federal offense punishable by fines or prosecution.</u> For indicator 3, consider another management action: <u>Delineate designated visitor parking areas (paved or unpaved) and install "No Parking" signs where appropriate.</u> For indicator 4, consider another management action: <u>Ensure that the number of</u></p>	<p>Comment noted. These are helpful suggestions, though at a finer level than is appropriate for the GMP, and could be included as implementation level actions.</p>

<p><u>interpretive signs and facilities at any given site is adequate to spread out potentially large numbers of attendees.</u> For indicator 5, consider two other management actions: (1) <u>On the NPS website and in visitor brochures, publish the days of the week and hours when staff will be onsite to answer visitor questions.</u> (2) Use printed, interpretive-trail-style brochures and portable recorded message systems to minimize demands on NPS interpretive staff.</p>	
<p>Page 97 - Section 106 Summary. In the third paragraph, change to, "In the fourth paragraph, the accepted term is "area of potential <u>effects (APE).</u>" Include APE in the list of acronyms.</p>	<p>Comment noted. Change "effect" to "affect" in column 2 and add APE to list of acronyms.</p>
<p>Page 101 – Cultural Environment (2nd paragraph). This paragraph presents the National Register information in a way that isn’t entirely true to the regulatory text. For example, the criteria are officially designated by letters, not numbers.</p>	<p>Comment noted. National register criteria are letters, and NHL criteria are numbers.</p>
<p>Pages 105-106 – Sentence spanning pages. “When it was created <u>by the WRA, the Tule Lake Relocation Center</u> encompassed. . .” This section contains other references to the “Tule Lake WRA Center,” and these should be changed accordingly since that is not an accurate name.</p>	<p>Comment noted. Change "Tule Lake War Relocation Authority Center" and "Tule Lake WRA Center" to "Tule Lake Relocation Center"</p>
<p>Page 115 – Peninsula. The first paragraph in this section states, “An archeological inventory of the Peninsula was undertaken in the summer of 2013. Results are anticipated in 2016.” Update the GMP as needed to reflect any results received.</p>	<p>Comment noted. Results are still forthcoming.</p>
<p>Page 117 – Stockade, Jail. Add more historical background on the jail, since this is one of the most significant remaining buildings. Details to discuss: 1) How labor to build the jail was provided by Tule Lake incarcerated, with Jimi Yamaichi as the construction foreman; 2) How 22.9 acres of site property was transferred by the federal government to the State of California (Division of Highways) in 1947, including the jail; 3) When and why jail and surrounding land was transferred to the NPS; 4) More detail regarding construction of the shelter over the jail – why, when (prior to conveyance of property to NPS), and by whom.</p>	<p>This level of detailed information is not within the scope of the GMP.</p>

<p>Page 125 – Industrial and Warehouse Area (and Cemetery). The former uses of the five existing warehouse buildings should be described.</p>	<p>These features are not within the Tule Lake Unit. Further detailed information is not within the scope of the GMP.</p>
<p>Page 125 – Industrial and Warehouse Area (and Cemetery). The single paragraph for this section gives only a cursory mention of the original Tule Lake Segregation Center cemetery. The cemetery deserves its own subsection and a far more in-depth discussion. A sentence on the following page (under “Linkville Cemetery”) states that, “WRA records from 1944 indicate that there were 331 deaths at Tule Lake,” but the center was open until March 1946 and many more deaths occurred in those later years. The cemetery used to have a large and beautiful monument (a photo of which was displayed at a prior Pilgrimage); the destruction of this monument should be discussed. Page 126 also says, “Records indicate that all [of those buried at Tule Lake] were reinterred at the Linkville Cemetery following the closure of Tule Lake.” What records, where are they located, and are they listed in the bibliography? How many deceased people were relocated, and were all their names recorded (since no one incarcerated at Tule Lake was there anonymously)? Were they individually reinterred in separate plots, or were their remains essentially comingled in a mass grave? All that remains of the original Tule Lake cemetery is a large pit; it’s unclear that the remains of all those buried there were respectfully treated and not simply excavated and dispersed as part of earth borrow activities. The term “borrow” should be defined for readers as the removal of soil from one location to be used at another. The location of a municipal dump next to the cemetery site is a disgrace.</p>	<p>See response to Comment 60.</p>
<p>Page 125 – Sewage Treatment Plants. This paragraph states that “Plant No. 2 is located on BOR land,” but a comparison of Figure 4 (page 11) and Figure 13 (page 139) shows that the plant is on land owned by the Bureau of Land Management (BLM), not the Bureau of Reclamation (BOR).</p>	<p>On page 125, change "BOR land" to "BLM land."</p>

<p>Page 125 - Landfill. This section states that, “The segregation center landfill is on BOR land northeast of Sewage Treatment Plant No. 2,” but (as per the comment above) this is also on BLM land, not BOR.</p>	<p>On page 125, change "BOR land" to "BLM land."</p>
<p>Page 126 – Linkville Cemetery. “WRA records from 1944” – what records specifically, and are they listed in the bibliography? Can a copy be obtained?</p>	<p>Please contact the Tule Lake Unit for more information.</p>
<p>Page 126 – Temporary Detention Centers. At a minimum, this section should give the total number of assembly centers and the states in which they were located, along with a reference to Figure 3. The last paragraph states that, “the Portland, Puyallup, Sacramento, and Salinas assembly centers each have some type of marker.” The Fresno, Santa Anita, and Stockton assembly center sites also have markers/memorials; others might as well, and they should be documented here for complete disclosure.</p>	<p>Change to "the Fresno, Portland, Puyallup, Sacramento, Salinas, Santa Anita and Stockton assembly centers each have some type of marker..."</p>
<p>Page 126 – Incarceration Camps. The first paragraph of this section should mention how many people originally sent to the Tule Lake Relocation Center remained there after segregation. The second paragraph does not mention the current status of Jerome, and it doesn’t specifically identify Manzanar and Minidoka as National Historic Sites. Did the designation of Manzanar as a NHS supersede its earlier designation as a NHL?</p>	<p>Comment noted. No change made. There were approximately 8,500 people, called the "Old Tuleans" who stayed at Tule Lake after segregation.</p>
<p>Page 127 – Values, Traditions. . . The discussion of the Modoc people sounds oddly detached and impersonal, particularly this sentence: “Significant population decline and cultural disruption after historic contact, coupled with dispersal of the remaining Modoc population after the war of 1872–73, led to fragmentation and dissipation of knowledge of the Modoc culture.” A possible alternative: “The Modoc culture was nearly destroyed following the influx of white settlers into their historic tribal lands. Their once thriving population was decimated by armed conflict and disease, and they were forcibly relocated after the war of 1872-73. The Modoc tribe was almost irreparably fragmented, and knowledge of their culture was dissipated.”</p>	<p>Comment noted. Change to “The Modoc culture was irreparably changed following the influx of white settlers into their historic tribal lands. Their population was decimated by armed conflict and disease, and they were forcibly moved to Oklahoma after the war of 1872–73.”</p>

<p>On pages 128 and 142, the document incorrectly refers to the division between Oregon and California as a boundary. The correct legal term for the division between states is a line: please revise the GMP/EA to change border to state line.</p>	<p>On pages 128 and 142, change "border" to "line"</p>
<p>Page 131 – Wildlife and Wildlife Habitat (last paragraph). “When <u>jurisdiction over</u> the Peninsula area was transferred from the Bureau...” (in what year?)</p>	<p>Edited as suggested. See errata.</p>
<p>Page 139 – Figure 13: Landownership—Newell. “Land Ownership” should be two words (change in the table of contents as well). The property of several of the major landowners named on pages 137 and 138 (Tulelake Irrigation District, Tulelake Growers Association, Newell Potato Cooperative, etc.) is not labeled or shown here, and it should be for clarity. The ownership of other adjacent private property should also be shown for full disclosure for the public record, particularly if those owner(s) are stakeholders/contributors named in the GMP/EA. Label the specific uses of the Caltrans, municipal, Modoc County, CDFW, and USBOR parcels/buildings. Is the label “municipal” equivalent to the town of Newell? Be more specific.</p>	<p>Comment noted. No change made. "Landownership" is one word in NPS style guides. The map only identifies ownership for publicly owned lands.</p>
<p>Page 143 – Population. Why is this information important in context of the Tule Lake GMP? Explain.</p>	<p>Comment noted. No change made. Demographic data is included as part of the affected environment.</p>
<p>Page 143 - Ethnicity. This paragraph discusses 2010 statistics for Modoc and Siskiyou Counties, but the accompanying table appears to use census data for 2015 (per the statement at the bottom of the table, "Source: U.S. Census Bureau 2015c"). Reconcile or explain as needed. Why is this information important in context of the Tule Lake GMP?</p>	<p>Comment noted. No change made. Demographic data is included as part of the affected environment.</p>
<p>Page 144 - Table 4.4. The figures "N =" at the top aren't explained, and they don't represent the totals of the figures listed in each column. Explain their meanings, put them elsewhere in the table, or eliminate.</p>	<p>Comment noted. Change "N=" to "Total=" Census figures illustrate that not all individuals report their race and ethnicity.</p>
<p>Page 144 – Table 4.7: Poverty Rates. Why does the heading for 2000 include the word “average” while 2010</p>	<p>Change to "2010 AVERAGE (%)"</p>

doesn't? Align numbers flush right.	
Page 148 – Assessing Impacts Using CEQ Criteria. The first paragraph contains an incomplete citation; it should be “(40 CFR 1508.27).”	Change to "(40 CFR § 1508.27)"
Page 149 - Management and Protection of Cultural Resources. Under the second bullet, use either “§ 800” or “Part 800” in the citation “36 CFR § Part 800,” not both. This comment applies to later pages of this chapter as well (page 153, for example).	Change to “36 CFR § 800...” on page 149 and 153.
Page 149 – Archeological Resources. Under the fourth bullet, change to “...until the resources can be identified...” and “... appropriate mitigation strategy <u>can</u> be developed...” to keep the verb tenses consistent.	Edited as suggested. See errata.
Page 150 – Soundscapes. Another measure to add: Work in advance with Modoc County and Tule Lake Airport representatives to ensure that local dump and airport operations don't disrupt outdoor memorial services at the Tule Lake Segregation Center cemetery site (conducted once every two years during the Tule Lake Pilgrimage).	Comment noted. This comment is outside the scope of the GMP
Page 153 - Cultural Resources Listed or Eligible to be Listed in the National Register of Historic Places. Eliminate the comma in this subheading.	Edited as suggested. See errata.
Page 181 – Section 7 (Consultation). This discussion in the first paragraph doesn't explain what Section 7 is. Consider starting the discussion with, “ <u>Section 7 (Interagency Consultation) of the Endangered Species Act...</u> ” Last sentence of the first paragraph: “... during preparation of the <u>GMP/EA</u> .”	Edited as suggested. See errata.
Page 189 – Appendix B. For clarity, this page should include the subtitle, “Omnibus Public Land Management Act of 2009, Title VIII, Subtitle C, Section 7202.”	Add subtitle “Omnibus Public Land Management Act of 2009, Title VIII, Subtitle C, Section 7202”
Page 195 – Third indented paragraph. This paragraph states, “The industrial area includes five warehouses, remains of three other buildings, and borrow pits that were part of the Tule Lake Segregation Center. They are now privately owned and used by the Newell Potato Cooperative.” Do these “borrow pits” include the site of	Comment noted. No change made. See response to Comment 60.

<p>the former Tule Lake Segregation Center cemetery? If so, this area was not dug out and disturbed until after the camp was closed. The cemetery warrants individual mention, and not just as a pit.</p>	
<p>Page 196 – 1st column, 2nd paragraph. “The access road crosses private property for approximately 60 yards near the privately owned corrals.” (not “corals”)</p>	<p>Edited as suggested. See errata.</p>
<p>Page 201 – Table, Archeological Resources. Capitalize “State Historic Preservation Officer” (and make sure this is done throughout the document).</p>	<p>Change to "State Historic Preservation Officer"</p>
<p>Page 203, Table, Historic Structures. No mention is made of rehabilitation or reuse/new use in “Desired Conditions.”</p>	<p>Comment noted. Rehabilitation and re-use are actions, rather than desired conditions.</p>
<p>While the cost breakdown for each phase is included in the full document, suggest that this information also be included in the summary newsletter.</p>	<p>Comment noted. The reader can refer to the GMP/EA for the full cost breakdown, since the newsletter was a summary.</p>
<p>Camp Tulelake: the WRA called it the isolation center, not sure that they called it Camp Tulelake.</p>	<p>Comment noted. Camp Tulelake predates the WRA calling it an "isolation center". No change necessary.</p>
<p>Suggest that the GMP refers to Abalone Mountain as “Awabi,” the Japanese term that the incarcerated used. It is important to get the names right in the plan.</p>	<p>Comment noted. Interpretative exhibits could use the term "awabi" in describing Abalone Mountain.</p>
<p>Suggest that Horse Mountain also be called Abalone Mountain wherever it is used in the document ("Horse/Abalone Mountain")</p>	<p>Comment noted. We use both names in the document because official name is Horse Mountain, but Japanese Americans knew it as Abalone Mountain.</p>
<p>The plan should more clearly explain the meaning of the term “segregation center.” The word “segregation” means many things to different people.</p>	<p>Comment noted. The historical background sections of chapters 1 and 2 explain the meaning and history of the segregation</p>

	center.
<p>The GMP and EA seem to equate the "Tule Lake Segregation Center" with the 37 acres controlled by NPS and Caltrans. This fundamentally misrepresents the situation. The Tule Lake Segregation Center is obviously by definition the whole 6,110 acre Tule Lake Segregation Center, as conceived, developed, and operated during World War II. The entire site, and the cultural landscape of which it is a part, is manifestly eligible for inclusion in the NRHP as a traditional cultural place (See National Register Bulletin 38, <a href="https://www.nps.gov/nr/publications/bulletins/nrb38/">https://www.nps.gov/nr/publications/bulletins/nrb38/</a>). Within the Tule Lake Segregation Center, 37 acres are currently under NPS and Caltrans control and are interpreted for the public along with Camp Tulelake and the Peninsula. It is confusing to the reader, and fatal to sensible planning, to apply the name of the whole Center to only the 37 acres now under NPS and Caltrans control. Please give the 37 acres an accurate title (Perhaps "the Jail Parcel") and reserve the term "Tule Lake Segregation Center" for the actual complete site of the Tule Lake Segregation Center."</p>	<p>Comment noted. Please see the description on page 1 for an explanation of how the NPS uses the term "segregation center". The NPS portion is a small part of the historic segregation center and this is interpreted to visitors.</p>
<p>The cross on the Peninsula was not erected by Nikkei as stated in the GMP/EA. It was placed by the Masons of the community in the 1930s.</p>	<p>More information is needed to make a determination of its history.</p>
<p>Under "Land Protections and Boundaries" (p. 5, Executive Summary): Regarding "Congressional Legislation would be required for all other modifications," assume this is limited to "boundaries"? Can general examples be given?</p>	<p>See Appendix C.</p>