Tule Lake Unit

World War II Valor in the Pacific National Monument General Management Plan and Environmental Assessment Finding of No Significant Impact

Modoc and Siskiyou Counties, California

May 2018

Introduction

This Finding of No Significant Impact (FONSI) documents the decision of the National Park Service (NPS) to implement Alternative C, the preferred alternative, as presented in the *Tule Lake Unit General Management Plan and Environmental Assessment* (GMP/EA), and the determination that no significant impacts on the quality of the human environment are associated with that decision.

In addition, pursuant to NPS *Management Policies*, the superintendent's determination of no impairment to monument resources and values is attached.

Purpose and Need for the Plan

The National Park Service has prepared a general management plan for the Tule Lake Unit to establish the unit's overall management direction for the foreseeable future. Legislation establishing the National Park Service (NPS) as an agency and governing its management provides the fundamental direction for the administration of the unit (and other units and programs of the national park system). This GMP builds on these laws and the presidential proclamation that established World War II Valor in the Pacific National Monument to provide a vision for the unit's future.

The Selected Alternative: Alternative C

The actions encompassed by the selected alternative are substantially the same as identified and analyzed in Alternative C (NPS Preferred Alternative) in the EA for the GMP. Minor modifications based on information and comments submitted during public review of the GMP/EA are incorporated herein. The text was also edited for clarity. A list of modifications incorporated in the selected alternative is on page 16. As

described in the GMP, the actions listed in "Actions Common to All Alternatives" are also included in the selected alternative.

Concept

The primary focus of the approved GMP is to emphasize raising national awareness about the Tule Lake Unit's unique incarceration, segregation, and renunciation history and its resources.

The key components of the selected alternative are as follows:

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

Implementation of the selected alternative will depend on future funding. Approval of the selected alternative does not guarantee that the funding and staffing needed to implement the plan will be forthcoming. Full implementation would likely take many years. Additionally, some of the future long-term funding needed to implement the various actions called for in the selected alternative could come from nonfederal partners.

Implementation of the selected alternative will occur in phases, and many actions are described according to phase.

Management Actions for the Selected Alternative

MANAGEMENT STRUCTURE, PARTNERSHIPS, AND AGREEMENTS
The NPS will continue to manage the Tule Lake Unit and nearby Lava Beds National
Monument together with shared positions that support both units.

The NPS will actively support a wide range of partnerships at the local, regional, and national scale and with a wide variety of stakeholders, organizations, and institutions. The NPS will develop and maintain strong partnerships with local organizations and the local community to protect resources significant to the Tule Lake story and to share this nationally important story in local schools and venues. The NPS will provide opportunities for volunteer and learning activities to engage and involve the local community in Tule Lake's history. The NPS will support the Tule Lake Pilgrimage with tours and assistance within the Tule Lake Unit. Organizations receiving grants related to Tule Lake, including Japanese American Confinement Sites grants, will be provided assistance and support to the extent practicable. The Tule Lake Unit will continue to coordinate with a cooperating association to provide relevant books, materials, and merchandise related to the Tule Lake Unit for purchase by visitors.

In addition the Unit will:

- Recommend congressional legislation to authorize a name change from the Tule Lake Unit of World War II Valor in the Pacific National Monument to Tule Lake National Historic Site. The name change will also administratively separate the Tule Lake National Historic Site from the other eight sites of the World War II Valor in the Pacific National Monument, resulting in a standalone unit.
- Work collaboratively with the U.S. Fish and Wildlife Service (USFWS) to enter
 into an agreement that allows the NPS to manage and interpret resources at
 Camp Tulelake and the Peninsula, consistent with the management requirements
 of the Tule Lake National Wildlife Refuge. On the Peninsula, the National Park
 Service will manage wildlife and vegetation in accordance with USFWS
 guidelines. The USFWS could also continue to take a lead role in compliance for
 the Peninsula and Camp Tulelake.
- In partnership with the USFWS, develop an agreement with the Newell Water District to allow for continued use of the contemporary water tower and access route on the Peninsula within the designated unit boundary.
- Work collaboratively with California Department of Transportation (Caltrans) to ensure the long-term protection of the 2.37-acre parcel that is owned by Caltrans and located within the segregation center site.
- Continue agreements with Siskiyou and Modoc counties for law enforcement and emergency medical services, and with Tulelake Multi-County Fire Protection District for fire protection at the segregation center and Camp Tulelake sites.
- Seek to change proprietary jurisdiction to concurrent jurisdiction for law enforcement.

SITE SPECIFIC MANAGEMENT GUIDANCE

The Tule Lake Unit is composed of three areas associated with the incarceration of Nikkei (Japanese Americans and legal residents of Japanese ancestry) during World War II: 1) a portion of the Tule Lake Segregation Center (37 acres), 2) the Peninsula, also called "Castle Rock" (1,277 acres), and 3) Camp Tulelake (66 acres). Thirty-five acres of the Tule Lake Segregation Center area are owned and administered by the National Park Service; the remaining 2.37 acres are owned by the State of California Department of Transportation. The Peninsula and Camp Tulelake are owned by the U.S. Fish and Wildlife Service and co-managed with the National Park Service.

Tule Lake Segregation Center

The 37-acre segregation center site will function as the primary location for visitor learning and interpretive opportunities. Within the segregation center site, the jail and stockade area will be the focal points for visitors to see and experience the unique resources associated with Tule Lake's segregation and renunciation history. Visitors will learn about incarceration and its causes, segregation, renunciation, and the impacts on Nikkei and the Tule Lake Basin community during and after World War II. The segregation center site will be open year-round for public access.

Existing onsite historic resources, including the cultural landscape and buildings and other structures, will be protected, stabilized, treated, and maintained for long-term preservation.

Visitors will enter the segregation center site from SR 139 and park in the former post engineer's yard. The NPS will work with Caltrans to formalize vehicular access from SR 139 with a turn lane and associated road and parking in the post engineer's yard. Site planning will be necessary to determine the specific location and dimensions for a road and parking area. The existing entrance into the segregation center site near the jail will be used for NPS access to the motor pool area.

To the extent possible, circulation and new development will be based on historic circulation. Spatial relationships of all resources (structures, roads, fences, paths, etc.) will be maintained and preserved. Visitor amenities and services will be upgraded, including the interpretive signage and restroom facilities.

The NPS will work with Caltrans to ensure that the existing commemorative feature that contains the California historical landmark plaque along SR 139 is maintained.

Phase 1

Actions in phase 1 provide essential visitor experiences, upgrade existing infrastructure to support visitors and operations, and reconstruct important character-defining features.

While other facilities are upgraded, the ditch rider house will serve as a temporary visitor contact station and administrative office space. The ditch rider house will provide a place for visitors to interact with NPS staff and receive a limited orientation to the Tule Lake Unit. It will also serve as the starting point for ranger-led tours to the jail and stockade. Restroom facilities will be located in or near the house. Because of the small size of the house, interpretive exhibits will be limited.

A pedestrian trail that meets accessibility requirements will lead to the jail and stockade area from the post engineer's yard. Visitors will see and experience a series of fences and gates that were the physical features of confinement and segregation.

The jail and stockade area will serve as the focal point for visitation to the Tule Lake Unit. The jail and stockade have long been considered the most iconic symbols of the injustice borne by Japanese Americans during World War II. The jail and stockade area will provide an immersive experience into the historic setting where hundreds of individuals were imprisoned and suffered. During World War II, this area was considered the "jail within a jail," where over 350 individuals deemed "troublemakers" were imprisoned in overcrowded conditions. It was here that prisoners went on hunger strikes in protest of their treatment. Ranger-led and self-guided tours will offer the public opportunities to see and understand, firsthand, the physical measures used by the WRA and government to imprison these individuals.

The jail will be restored, and its cover and surrounding fence will be removed (subject to separate environmental compliance initiated in 2016 and expected to be released for public review in spring 2018). Visitors will be provided escorted access inside the jail to intimately see and experience the physical confines of the structure. Historic handwritten graffiti, including names, poems, and drawings, will be available for the public to read and see. Other jail features, such as the jail bars and bunks, will show the conditions of day-to-day life.

Select historic features in the stockade that are no longer present will be reconstructed because of their extraordinary importance in accurately depicting the conditions within the Tule Lake Segregation Center. In order for the public to understand the incarceration, segregation, and renunciation history at Tule Lake, particularly in the jail and stockade area, at least one of the five guard towers that surrounded the stockade will be reconstructed. Historically, these guard towers, equipped with floodlights, were

manned 24 hours a day by armed soldiers. Extant historic fences will be repaired in the stockade. Other historic fences will be stabilized, such as the 1,800-foot long "man proof" fence surrounding three sides of the stockade. The beaverboard fence, which was constructed by the WRA to block views and communication from within and outside the stockade, will be reconstructed in its original location. Within the stockade, there were two barracks, a mess hall, latrine, and several army tents used for "punishment" of those who displeased the authorities. Known as the "bull pen," these features will be delineated to illustrate the overcrowded living conditions. The historic features together will provide visitors with an immersive experience in the stockade to further their learning and understanding of segregation, protest, and renunciation in the context of the incarceration history.

The WRA motor pool area will serve the unit's administrative and maintenance functions, using the existing entrance into the area. The silver garage will be minimally rehabilitated to house an insulated modular structure (IMS) for climate-controlled curatorial storage. The curatorial storage is necessary to provide secure and adequate space for the unit's growing museum collection. As individuals associated with Tule Lake pass on, many have expressed that they want the NPS to preserve their items. An IMS will provide this necessary storage space and will be located onsite to allow for research and access to the collections. The non-historic exterior shell of the silver garage will be maintained. The silver garage will also serve as general storage for the Tule Lake Unit. The blue garage will be minimally rehabilitated to support large equipment storage.

Phase 1 will include planning, design, and compliance for adaptively reusing the historic carpenter shop as the primary visitor facility; construction will be undertaken in phase 2.

Utilities necessary for the carpenter shop in the post engineer's yard and the silver garage in the motor pool area will be improved or installed, including water, electric, and sewer systems.

Phase 2

Phase 2 actions include rehabilitating the carpenter shop, improving visitor accessibility and circulation, moving more unit operations onsite, and improving the condition of resources and areas within the segregation center site.

The historic carpenter shop will be rehabilitated to replace the ditch rider house as the primary visitor facility for the Tule Lake Unit. It will be open and staffed year-round. Its 2,700-square-foot space is compatible with the predicted level of visitation. Within the carpenter shop, visitors will have the opportunity to interact with NPS staff, receive orientation information, and learn about Tule Lake's primary interpretive themes

through a variety of digital and hard media. It will also house a small store for educational materials, including books and merchandise.

The ditch rider house could remain for operational support until it is no longer needed, at which time it could be removed.

Important character-defining landscape features could be delineated and restored. Vegetation will be managed to evoke the historic character of the camp, including the bleak and barren landscape conditions that incarcerees experienced during World War II. The historic trees along SR 139 could be replanted; they served to improve the landscape conditions in the camp by providing gestures of care and beauty, as well as serving as windbreaks in the high desert environment. The roadside ditch could also be delineated or restored.

In the WRA motor pool area, planning, design, and compliance for the silver garage will occur in phase 2 in preparation for the rehabilitation work that will occur in phase 3. The warehouse will be stabilized, and it will remain vacant or could serve as storage for the Tule Lake Unit.

The Tulelake Irrigation District (TID) storage area will be cleaned of hazardous materials.

Phase 3

Phase 3 projects include additional visitor accessibility and circulation, reconstruction of character-defining historic features, historic preservation work for operational facilities including the service garage, and associated utilities.

In the stockade, one of the two original barracks will illustrate the historic buildings and features inside the stockade. The barrack could be reconstructed or an historic barrack from the Tule Lake Segregation Center could be acquired and placed in the stockade. The barrack will allow visitors to learn about the daily lives of prisoners in the stockade, which could be contrasted with barrack life in the main part of the camp and other camps. The barrack will provide a space for learning about the most critical and controversial aspects of Tule Lake's history related to injustice, "loyalty" and "disloyalty," protest, renunciation, and relevance. The barrack will house interpretive exhibits and could function as a multi-purpose space for interpretive and educational activities. In the long term, the remaining barrack, mess hall, latrine, guard towers, and associated landscape features could be reconstructed or returned to the site to further illustrate the stockade's built environment.

In the WRA motor pool area, the silver garage will be rehabilitated to serve the unit's operational needs, including necessary staff offices and maintenance functions. The insulated modular structure for curatorial storage will remain or could be upgraded. The blue garage will be maintained for maintenance and storage purposes until additional stabilization is necessary and/or a function is determined that will require additional historic preservation treatments or facility upgrades.

Utilities necessary for the silver and blue garages will be improved or installed, including water, electric, and sewer systems.

Camp Tulelake

Camp Tulelake will be open during the extended summer season. An NPS ranger will be onsite to lead tours and to provide an introduction to Camp Tulelake, its significance, and its resources. During the off-season, the NPS will collaborate with the USFWS to maintain a small visitor contact area in the USFWS Tule Lake National Wildlife Refuge Visitor Center, which is located 1 mile south. Generally, visitors will learn about Camp Tulelake on their own through digital media and self-guided tours.

Camp Tulelake will be accessed via Hill Road. Visitor vehicles will park at the small parking area off Hill Road or near the barracks until a road and parking area are formalized.

Phase 1

Phase 1 includes stabilization of historic buildings to prevent loss of historic fabric. The contributing historic buildings include the mess hall, shop, and barracks. The mess hall is in poor condition, at imminent risk of collapse, and in need of emergency stabilization. The shop is also in poor condition and in need of stabilization. The barracks building is in fair condition; however, all wings need stabilization and life/health/safety improvements to allow employee and visitor access.

Noncontributing resources at Camp Tulelake include the pump house and paint shop. These buildings will not receive stabilization and could be removed.

A vault toilet will be installed at the site.

Phase 2

Phase 2 will include formalizing and/or constructing roads, parking, and trails.

Phase 2 will also include delineation and restoration of select non-extant historic landscape features to provide visitors with an understanding of the Civilian Conservation Corps (CCC) and World War II uses of the site. The historic character-

defining landscape features that will be considered for historic preservation treatments include the flagpole, machine-gun post, and parade grounds.

Phase 3

Phase 3 will include the rehabilitation of the north wing of the barracks, which will serve as a staffed visitor contact area during the summer season.

Peninsula

The NPS will continue to provide ranger-led tours of the Peninsula during the summer season, for special events, and for research, consistent with the management requirements of the Tule Lake National Wildlife Refuge. The frequency of guided tours and routes could change in the future, so that visitors are provided more options to see and experience the Peninsula. These tours allow visitors a space for contemplation about Tule Lake's history, significance, and relevance. They also allow visitors to understand the vastness and openness of the original Tule Lake and learn about the Peninsula and Tule Lake National Wildlife Refuge's wildlife and habitat, an activity that has not been possible since the 1980s. The Peninsula will be closed to public access at all other times.

The Peninsula contains resources that represent several periods of occupation and cultural significance over time. These resources are associated with the Modoc people, early settlers, those who lived through the World War II era, and present-day neighbors and visitors. For the Modoc people, whose members have long told creation stories tied to Tule Lake, and for whom there is no place of equal importance to the shoreline of Tule Lake, the Peninsula serves as one of the limited remaining tangible links with their ethnic heritage. During World War II, for Japanese Americans and those at Tule Lake, the Peninsula served as a natural landmark for orientation, a place for recreation prior to segregation, and an inspiration for artists. The distinctive promontory likewise serves as an important scenic resource for the local community today. The Peninsula also provides important habitat for falcons, hawks, and other raptors.

The NPS will work with USFWS to support additional natural and cultural resource management activities, including surveys, documentation, research, monitoring, and treatments for the Peninsula. The NPS and USFWS will remove select unmaintained roads and trails on the Peninsula to restore natural conditions. There are numerous unmaintained roads and trails, many of them created by illegal off-road vehicle use.

During the lifetime of the GMP, the NPS could work with the USFWS to explore opening additional public access to select areas of the Peninsula along road and trail corridors. Any change in public access will be done with consultation with the Modoc of Oklahoma and Klamath Tribes and through a public planning process with

environmental compliance. The NPS recognizes the sensitivity and significance of resources at the Peninsula to the Modoc and Klamath people. The NPS also recognizes the significance of the Peninsula to the Newell and Tulelake communities. A change in public access will be contingent on support from the USFWS, formalized in an agreement and cost sharing for improvements to the road, parking, and any trail construction. An arrangement that allows access across private land on the road corridor to the water towers will also be necessary, contingent upon landowner approval.

In the event that open public access is allowed, a formalized public access route could follow the existing road to the Modoc County water towers, which was also the site of historic water towers that supported the Tule Lake Segregation Center during World War II. A parking area at the water towers and a trailhead could be established. A pullout along the road could allow mobility-impaired visitors to access the view of the segregation center site. A pedestrian trail could be constructed to the location of the historic World War II-era guard tower to provide an overlook point for visitors to see and understand the physical extent of the Tule Lake Segregation Center. Another trail could be a loop trail to the metal cross atop the Peninsula. The cross—originally erected during World War II by the Tule Lake Japanese American Christian Association and replaced in 1974 by local residents when the original fell—has been an important symbol for the Japanese Americans incarcerated at Tule Lake, their descendants, and the local Newell and Tulelake communities. The trails could include interpretive waysides.

ADDITIONAL PROGRAM MANAGEMENT GUIDANCE

Cultural Resources

The NPS will protect and preserve cultural resources within the Tule Lake Unit through a variety of treatments and methods, including collaborating with partners. These cultural resources include archeological features and sites, historic buildings and structures, cultural landscapes, ethnographic resources, and collections.

A phased approach will be implemented. Early steps will include surveys, documentation, and emergency stabilization to prevent loss of historic fabric. Additional treatments for historic buildings and cultural landscape features will include delineation, preservation, rehabilitation, restoration, and reconstruction. The NPS will develop and maintain a formal oral history program to record, preserve, use, and share personal narratives associated with the Tule Lake Unit's history and significance.

Archeological Resources

The NPS will conduct an archeological overview and assessment to better understand and document archeological resources in all three sites. Archeological projects will assist

in the identification and long-term protection of archeological features. The NPS will also explore opportunities for offsite archeological study at related sites with the appropriate permissions and agreements, for example at the historic dump. Offsite studies could be pursued on lands through partnerships with landowners, agencies, and organizations. The unit could also provide technical assistance on other archeological projects. The NPS will use archeological sites, features, and artifacts in interpretive programs and projects, including digital media. In phase 3, the NPS will develop a digital exhibit of the collections.

Historic Buildings, Structures, and Cultural Landscapes

The Tule Lake Unit's historic buildings, structures, and cultural landscapes will be treated as described in the segregation center and Camp Tulelake sections. Historic structure reports will be conducted for all historic buildings to document their conditions and make treatment recommendations based on their intended functions. Treatments could include stabilization, preservation, reconstruction, or rehabilitation. If future building functions are identified, appropriate historic preservation treatments will be undertaken. Buildings and structures that do not contribute to the period of significance could be removed. The NPS may be open to receiving original buildings, structures, and features associated with Tule Lake's history by donation or purchase. Each original building, structure, and feature will be evaluated for its historic significance and condition, and the feasibility of acquisition and future potential use will be evaluated on a case-by-case basis. A cultural landscape report will be conducted to define and guide treatments for all three sites. The NPS could work with willing landowners to inventory historic buildings, structures, and landscape features within the local community that are associated with Tule Lake's World War II history.

Values, Traditions, and Practices of Traditionally Associated Peoples

Values, traditions, and practices of traditionally associated peoples are also referred to as ethnographic resources.

The NPS will develop and maintain a formal oral history program to record, preserve, use, and share personal narratives associated with the Tule Lake Unit's history and significance. The NPS will target individuals with unusual or unique histories associated with Tule Lake's history and significance that have not yet been recorded elsewhere. These individuals could include Japanese Americans incarcerated at Tule Lake during World War II, WRA and military staff, Modoc Indians, and homesteaders. The identification of these individuals will be based on the unit's existing oral history strategy, which contains an inventory of oral histories associated with Tule Lake and identifies themes that lack oral histories. The NPS will seek opportunities to integrate oral histories into digital media and onsite and offsite interpretation and education

programs. The Tule Lake Unit will serve as a repository for oral histories related to Tule Lake, and the NPS will make these oral histories available for research. The NPS will additionally conduct an ethnographic overview and assessment for the Tule Lake Unit, as the original shorelines of Tule Lake and the Peninsula are important resources for the Modoc Tribe of Oklahoma and the Klamath Tribes. The NPS will formalize a tribal consultation program to share information with tribes and to determine any treatments to these ethnographic resources.

Collections

Collections will be curated onsite in the historic silver garage in an insulated modular structure. Collections will be made available for research and incorporation into interpretive exhibits. The NPS will scan and digitally display items on the unit's website and through its digital media. A scope of collections statement will be formalized to identify the types and quantities of items the NPS will collect and preserve, and will address items left at the site by visitors. The NPS could actively seek out collections items that represent different aspects of the unit's history. The long-term care of collections items consistent with NPS collections policy will be documented in a museum management plan.

Natural Resources

The NPS will inventory natural resources in the three sites and will develop a resource stewardship strategy to define desired future conditions for both natural and cultural resources. The resource stewardship strategy will prioritize mitigation and protection measures for natural and cultural resources. This holistic resource planning approach will integrate natural resource data—for example relating to wildlife, fire, and vegetation—with data on cultural resources in the same areas, providing managers with a comprehensive understanding of potential impacts of natural resource issues on cultural resources.

The NPS will additionally pursue appropriate data collection, monitoring, mitigation, and protection measures for natural resources. The NPS could pursue scientific research and assessments of changing environmental conditions – such as the introduction and establishment of invasive species and related impacts on the Tule Lake Unit's resources. Plans for resource management will include an integrated pest management plan and exotic weed management plan for the unit and a vegetation management plan for the Peninsula. Future plans, strategies, and inventories will also consider cultural resource assessments and prescriptions for management.

Strategies to Promote Sustainability

Management strategies to promote sustainability will be considered when implementing the broader management direction for the Tule Lake Unit. Related strategies will

include the promotion of energy-efficient practices and adaptive management to address changing conditions.

Visual and Scenic Resources

The NPS will work collaboratively with others and pursue partnerships to protect and preserve character-defining viewsheds and develop viewpoints to the extent possible. Important views and vistas include the Peninsula and Horse Mountain.

Interpretation, Education, and Information

The NPS will continue to lead interpretive and educational efforts for all three sites and develop new interpretive media. The NPS will focus the content of interpretive and educational programs on the unit's interpretive themes, which were developed as part of this GMP effort and through a public planning process.

The NPS will increase awareness about Tule Lake's existence, significance, and relevance through interpretation, education, and outreach. The NPS will develop a wide range of learning opportunities both onsite and offsite and in partnership with local, regional, and national stakeholders and organizations. Outreach programs and online media will be designed to reach people who are not able to visit the unit, as well as to entice them to visit. NPS staff, volunteers, and partners will be trained to convey accurate information about Tule Lake's unique incarceration, segregation, and renunciation history and significance, as well as its local history and significance, including Camp Tulelake's CCC era.

At the segregation center site, the NPS will provide an interactive and immersive experience for visitors. Visitors will have opportunities to talk with NPS interpretive staff at the carpenter shop and through ranger-led tours. A variety of educational and interpretive media and programs will include exhibits, film, publications, a symposium series, and print media, as well as self-guided audio tours, virtual tours, and driving tours linked to developed sites that could include pullouts and waysides. Interpretive exhibits and programs will rely heavily on oral histories to tell Tule Lake's history from the people who experienced it firsthand and will be enhanced by digital media. The unit could partner with other entities to seek funding for projects and help support initiatives, such as an artist-in-residence program.

Interpretive digital media and/or waysides will be featured at key locations throughout the three sites to tell the full breadth of Tule Lake's history and significance. For example, a wayside at the location of the historic guard tower on the Peninsula could help visitors understand the geographic extent and size of the Tule Lake Segregation Center.

Online media will be greatly expanded, including social media, virtual classrooms, online exhibits, and an online resource for research about Tule Lake. Online media will also focus on connecting with other Japanese American World War II confinement sites, social justice and civil rights sites, and allied organizations so that online national and international users can learn and understand more about World War II Japanese American incarceration history. The online system could also contain scanned primary source documents and photographs, a searchable database of those incarcerated or associated with Tule Lake, and natural and cultural resource data for researchers and those seeking a greater depth of knowledge about Tule Lake. The NPS will actively explore new media opportunities to share Tule Lake's history.

During the off-season, the NPS will collaborate with the USFWS to maintain a small visitor contact area in the USFWS Tule Lake National Wildlife Refuge Visitor Center, which is located 1 mile south of Camp Tulelake. Exhibits will provide interpretive and visitor information about the Tule Lake Unit. This will enhance both the NPS's ability to reach new audiences and the USFWS's ability to interpret more of the Tule Lake National Wildlife Refuge's history and national significance.

Outreach activities will promote learning and understanding of the Tule Lake Unit in the Klamath Basin, regionally along the West Coast, and nationally. Local Klamath Basin schools will be a key focus for outreach programming. The NPS will have an increased presence in local museums and educational institutions and organizations. Symposia, local or travelling speaker series, and local and travelling exhibits could be developed in partnership with others to support Tule Lake's purpose. The NPS will continue to conduct teacher trainings in partnership with educational entities.

Land Protection and Boundaries

During the lifetime of this GMP, the NPS will explore collaborative relationships and partnerships with willing landowners, both public and private, within the historic extent and viewshed of the Tule Lake Segregation Center. The mechanisms used could take the form of technical assistance, memorandums of understanding, right-of-way agreements, and easements to preserve and interpret contributing resources associated with Tule Lake's history. The NPS goals will include: 1) provide technical assistance and support for historic preservation activities; 2) seek opportunities to provide public interpretation about Tule Lake's history; 3) address necessary or desired access, operational, and management issues; and 4) encourage the protection of significant resources that contribute to Tule Lake's viewshed.

Areas for potential relationships and partnerships include sensitive and important sites, such as areas with in situ camp remnants, and scenic landscape resources, such as Horse

Mountain and the greater Newell area. Partnership opportunities around the Peninsula could also be considered to provide public access to the Peninsula's resources and for public enjoyment. If mutually agreeable, the NPS, private owners/managers, and other public land management agencies could pursue partnership or co-management of lands within the historic extent of the camp—such as lands managed by the Bureau of Land Management.

The NPS, in collaboration with USFWS and local neighbors, will conduct a cadastral survey of all lands within the unit to legally define the unit's boundaries.

At this time, the surrounding historic lands are determined not to be feasible for addition to the Tule Lake Unit, and the NPS is not intending to modify or add lands to the boundary of the Tule Lake Unit.

If adjacent landowners wish to donate, exchange, or sell property in the future, the NPS may consider minor boundary modifications for lands that share a boundary with the existing Tule Lake Unit. A minor boundary modification that relies on Land and Water Conservation Fund acquisition funding is defined as an area up to five percent of the total acreage of the unit, not to exceed 200 acres. Any minor boundary modification will be for resource protection, improved access to existing Tule Lake Unit lands, and/or for necessary operations. Any minor boundary modification will only be considered with the full consent of the landowner. Modifications could include easement or acquisition and will comply with all federal laws and NPS policies.

Congressional legislation will be required for all other modifications. Any boundary modification will be undertaken only with cooperation from willing landowners. Acquisition by condemnation or eminent domain will not be authorized.

Safety and Security

Safety and security will be a high priority for the NPS in its management of the Tule Lake Unit. Operational leadership concepts and strategies will be integrated into all aspects of management. The NPS will continue current partnerships with emergency management agencies and local law enforcement.

Park Operations

The Tule Lake Unit will have a mix of dedicated staff positions for the Tule Lake Unit and shared positions with Lava Beds National Monument.

Park operations will be based in the ditch rider house, in a leased space in the town of Tulelake, and at the Lava Beds National Monument headquarters until the silver garage in the WRA motor pool area is upgraded to house administrative offices, curatorial storage, and maintenance functions and storage.

Staffing will include positions in resource management; interpretation, education, and visitor services; facilities and maintenance; law enforcement; and administration. Many positions will be shared with Lava Beds National Monument.

Action Plans and Studies

A number of specific action plans and studies will be developed to implement the selected alternative. Some of these plans and studies will be standalone projects and will require funding. Many of these plans and studies will be components of other specific actions or will not require project funding. Plans for actions with potential to affect the environment will require formal analysis of alternatives in compliance with the National Environmental Policy Act (NEPA), National Historic Preservation Act, and related laws. Such documents will reference and be tiered to the general management plan/EA. Some of these plans and studies will be conducted in collaboration with USFWS. The following plans are recommended for full implementation of the selected alternative:

- Cultural landscape report
- Climate action plan
- Data management plan for GIS
- Design concept plans / site plans for the segregation center site and Camp Tulelake
- Emergency management system plan
- Emergency stabilization plan for Camp Tulelake
- Exotic weed management plan
- Integrated pest management plan
- Long-range interpretive plan
- Park asset management plan
- Resource stewardship strategy
- Safety plan
- Scope of collections statement/museum management plan
- Signage and wayfinding plan
- Soundscapes management plan
- Virtual visitor experience plan
- Vegetation management plan

The following data are recommended for full implementation of the selected alternative:

- Annotated bibliography of the Tule Lake Unit
- Archeological overview and assessment
- Cultural resource data for the Peninsula site

- Exotic weed geodatabase
- Ethnographic overview and assessment
- Hazardous materials survey at Camp Tulelake
- Historic photographs inventory
- Historic resource study
- Historic structure reports
- Inventory of museum collections and collections at other sites
- Natural resources inventory and GIS mapping
- Resource data about historically significant features and lands outside the boundary
- Soundscape and dark night sky baseline inventories

User Capacity

Park staff will monitor resource and visitor experience indicators, evaluate current conditions against established standards, and take appropriate steps to ensure the unit's user capacity is not exceeded.

Modifications Incorporated in the Selected Alternative

There are no substantial additions, nor did any of the changes result in altering the magnitude, duration, and extent of environmental impacts. Based on additional staff analysis and public review, modifications for impact-related actions and program changes that affect unit operations are as follows:

- The NPS will continue to manage the Tule Lake Unit and nearby Lava Beds National Monument together with shared positions that support both units.
- In the long term, the remaining three barracks, mess hall, latrine, guard towers, and associated landscape features could be reconstructed or returned to the site to further illustrate the stockade's built environment.
- The NPS and USFWS would <u>remove-rehabilitate</u> select unmaintained roads and trails on the Peninsula to restore natural conditions.
- In addition, the NPS would identify measures to monitor and protect raptor nesting sites, adaptively manage habitat for species of concern, and control or remove exotic species, such as noxious invasive weeds.
- If adjacent landowners wish to donate, exchange, or sell property in the future, the NPS may consider minor boundary modifications for lands that share a boundary with the existing Tule Lake Unit.

- The following plans would be recommended for full implementation of selected alternative:
 - o Signage and wayfinding plan
 - o Vegetation management plan for the Peninsula

Mitigation Measures

Mitigation measures are the practicable and appropriate methods that would be used to avoid and/or minimize harm to the unit's natural, cultural, visitor, and socioeconomic resources. These mitigation measures have been developed based on existing laws and regulations, best management practices, conservation measures, and other known techniques from past and present work.

The GMP provides a management framework for the unit. Within this broad context, the following measures will be used to minimize potential impacts from the implementation of the selected alternative. These measures will be applied subject to funding and staffing levels. Additional mitigation measures will be identified as part of implementation planning and for individual projects to further minimize resource impacts.

Management and Protection of Cultural Resources

- Pursue strategies to protect cultural resources, including museum collections and archeological, historic, ethnographic, and archival resources, while encouraging visitors and employees to recognize and understand their value.
- Avoid adverse impacts to properties determined eligible for listing in the National Register of Historic Places. If adverse impacts cannot be avoided, mitigation will be developed in consultation with the State Historic Preservation Office (SHPO), tribes, and other consulting parties pursuant to 36 CFR § Part 800, the implementing regulations for the National Historic Preservation Act.

ARCHEOLOGICAL RESOURCES

- Known archeological sites will be periodically monitored to track their condition, identify any new or emerging threats, and identify any treatment measures necessary for their preservation and protection.
- Consultation with traditionally associated American Indian tribes and groups will help inform managers of the traditional cultural and religious significance of these resources and other associated communities.

- Archeological surveys will precede ground disturbance required for new construction or other management activities. Known archeological resources will be avoided to the greatest extent possible.
- If previously unknown archeological resources are discovered during any project work, work in the immediate vicinity of the discovery will be halted until the resources could be identified, evaluated, and documented and an appropriate mitigation strategy could be developed, if necessary, in consultation with the state historic preservation office and associated American Indian tribes and groups.
- If previously unknown archeological resources are discovered as a result of natural processes, these resources will be documented, added to the unit's inventory, stabilized where feasible and appropriate, and included in the periodic monitoring program.

VALUES, TRADITIONS, AND PRACTICES OF TRADITIONALLY ASSOCIATED PEOPLES

- Maintain an active tribal consultation program for identification and evaluation
 of natural and cultural resources with cultural and religious significance to
 traditionally associated American Indian tribes and groups, as well as
 recommendations for management.
- Consult with tribes and tribal groups regarding unit undertakings with the potential to affect resources of cultural and religious significance to ensure tribal perspectives are understood, and adverse effects are avoided or minimized.

HISTORIC RESOURCES

- Documented historic sites, structures, buildings, and landscapes will be periodically monitored to track their condition, identify any new or emerging threats, and identify any treatment measures necessary for their preservation and protection.
- Cyclic maintenance, periodic repair, and rehabilitation of historic buildings, structures, and landscapes will be undertaken in keeping with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* in order to protect and maintain the integrity and significance of the resources.

Management and Protection of Natural Resources

AIR QUALITY

- Minimize NPS vehicle use and emissions and employ the best available control technology.
- Encourage public and commercial tour bus companies to employ transportation methods that reduce emissions.

- Encourage employee carpooling and strive to accommodate employee work schedules to maximize carpooling ability.
- Implement a no-idling policy for all government vehicles.
- Coordinate and consolidate NPS vehicle trips to accomplish multiple tasks and carpooling, when possible.
- Implement sustainable practices in unit operations and building designs that minimize energy demands, thus minimizing air pollution emissions.

SOUNDSCAPES

- Implement standard noise abatement measures during unit operations, including: scheduling to minimize impacts in noise-sensitive areas, using the best available noise control techniques, using hydraulically or electrically powered impact tools when feasible, and locating stationary noise sources as far from sensitive habitat and concentrated visitor use areas as possible.
- Locate and design facilities to minimize noise.
- Avoid idling motors when power tools, equipment, and vehicles are not in use.

DARK NIGHT SKIES (LIGHTSCAPES)

- Light only where and when needed.
- When outdoor lighting is needed, install energy-efficient lights equipped with timers and/or motion detectors so that light will only be provided when it is needed to move safely between locations.
- Use low-impact lighting, such as diffused light bulbs, and techniques such as downlighting to prevent light spill and to preserve the natural lightscape.
- Use the minimum brightness needed for a task or activity and install warmer colored lights to reduce impact on nighttime vision and wildlife.

HYDROLOGIC SYSTEMS AND WATER QUALITY

- For projects requiring ground disturbance, implement erosion control measures as appropriate, including mitigating unnatural discharge into water bodies.
 Regularly inspect construction equipment and vehicles for leaks of petroleum and other chemicals to prevent water pollution.
- Use bio-lubricants (such as biodiesel and hydraulic fluid) in construction equipment.
- Develop and implement a spill prevention and response plan and acquire supporting equipment.
- Integrate runoff management and mitigation systems into the designs of parking areas near water resources.

- Develop sediment control and prevention plans and implement best management practices for projects that could impact water quality.
- Reduce and reuse wastewater.

SOILS

- Locate new facilities on soils suitable for the type and scale of development proposed.
- Minimize soil erosion by limiting the time that soil is left exposed and by applying other erosion control measures, such as erosion matting, silt fencing, and temporary sedimentation basins in construction areas to reduce erosion, surface scouring, and discharge to water bodies.
- Require all project managers to implement the unit's invasive plant management prevention and treatment program.
- Once work is completed, revegetate construction areas with appropriate native plants in a timely period according to revegetation plans.

VEGETATION

- Monitor areas used by visitors for signs of native vegetation disturbance. Use
 public education, revegetation of disturbed areas with native plants, erosion
 control measures, and barriers to control potential impacts on plants from
 erosion, trampling, or social trails.
- Minimize size and number of staging areas, overflow parking, and operational impacts to vegetation by delineating these areas and revegetating if necessary.
- Develop revegetation plans for disturbed areas which are consistent with the monument's landscaping plan and require the use of genetically appropriate native species. Revegetation plans will specify species to be used, seed/plant source, seed/plant mixes, site-specific restoration conditions, soil preparation, erosion control, ongoing maintenance and monitoring requirements, etc. Salvaged vegetation will be used to the greatest extent possible.
- Implement an invasive plant prevention, treatment, and management plan focusing on prevention and rapid response. Standard measures could include the following elements: use only weed seed-free materials for road and trail construction, repair, and maintenance; ensure equipment arrives on site free of mud or seedbearing material; identify areas of invasive or nonnative plants preproject and treat any populations or infested topsoil before construction (e.g., topsoil segregation, storage, herbicide treatment); when depositing ditch spoils along the roads, limit the movement of material to as close as possible to the excavation site; scrupulously and regularly inspect areas that serve as introduction points for invasive or nonnative plants; revegetate with genetically

appropriate native species; inspect rock and gravel sources to ensure these areas are free of invasive and nonnative plant species; and monitor locations of ground-disturbing operations for at least three years following the completion of projects.

WILDLIFE

- Employ techniques to reduce direct human impacts to wildlife, including visitor
 education programs, restrictions on visitor and park activities when warranted,
 development and use of best management practices for management activities
 (including construction), permit conditions, temporary and/or permanent
 closures of sensitive sites, and law enforcement patrols.
- Implement measures to reduce adverse effects of nonnative plants and wildlife on native species.
- Protect and preserve critical habitat features, such as rock outcrops, swales, nesting sites, roosting sites, and migration corridors, whenever possible.

SPECIAL STATUS SPECIES

- Mitigation actions will occur during normal operations as well as before, during, and after projects to minimize immediate and long-term impacts on rare, threatened, and endangered species. These actions will vary by project area, and additional mitigation measures may be added depending on the action and location. Many of the measures listed for vegetation and wildlife resources will also benefit species that are rare, threatened, endangered and/or of management concern by helping to preserve or minimize impacts on habitat.
- Conduct surveys and monitoring for special status species as warranted.
- Locate and design facilities/actions/operations to avoid or minimize impacts on special status species habitat. If avoidance is infeasible, minimize and mitigate for adverse effects as appropriate and in consultation with technical experts.
- Minimize disturbance to special status species, nesting, and migratory bird habitat through spatial and temporal planning.
- Develop and implement restoration and/or monitoring plans as warranted. Plans should include methods for implementation, performance standards, monitoring criteria, and adaptive management techniques.

Management and Protection of Scenic Resources

- Design, site, and construct facilities to minimize adverse effects on natural and cultural resources and visual intrusion.
- Provide vegetative screening, where appropriate.

Socioeconomic Environment

 During the future planning and implementation of the approved management plan for the Tule Lake Unit, National Park Service staff will collaborate and/or pursue partnerships with tribes, local communities, and county governments to further identify potential impacts and mitigating measures that will best serve the interests and concerns of both the National Park Service and the local communities.

Sustainable Design

- Sustainable practices will be used in the selection of building materials and sources and building location and siting. Sustainable design standards will be considered in all historic preservation and construction projects.
- Projects will use sustainable practices and resources whenever practicable by recycling, reusing, and minimizing materials, minimizing energy consumption during construction, and reducing energy needs

Implementation of the General Management Plan

Once the GMP planning process is completed, the selected alternative will become the new management plan for the unit and will be implemented in phases. More detailed planning and environmental documentation may be completed, as appropriate, before some of the actions will be carried out. The unit's annual work planning effort will help develop priorities that determine how best to implement the GMP.

As stated earlier, implementation of the GMP will depend on future funding, occur in phases, and take many years. The GMP provides a blueprint for park management. Approval of the selected alternative does not guarantee that the funding and staffing needed to implement the plan will be forthcoming.

Other Alternatives Evaluated

Two other alternatives were considered for the Tule Lake Unit.

Alternative A was the "no action" alternative. A no action alternative is required by the National Environmental Policy Act and is a baseline for comparison in evaluating the changes and impacts of the other alternatives. Alternative A would have relied solely on the Tule Lake Unit's base funding. The unit would have been closed to the public, except during the summer season at the segregation center's ditch rider house. Access to Camp Tulelake, the Peninsula, and the segregation center's stockade would have only

been allowed infrequently during scheduled tours led by NPS rangers; these areas would have been closed at all other times. Only two ongoing projects would have occurred: the restoration of the jail and minimal local interpretation and education programming.

Alternative B (Limited Operations) proposed that visitor services, educational and interpretive programming, resource management, facility maintenance and improvements, and staffing would have been limited. The unit would have been closed to the public, except during the summer season at the segregation center's ditch rider house. Access to Camp Tulelake, the Peninsula, and the segregation center's stockade would have only been allowed infrequently during scheduled tours led by NPS rangers; these areas would have been closed at all other times. Implementation of this alternative would have required an increase to the Tule Lake Unit's operating budget.

Under Alternative B, resource management activities would have included baseline data gathering to survey resources and document conditions. Historic resources that are in poor condition would have been stabilized to prevent resource loss. Other than the restoration work to the jail and rehabilitation of the ditch rider house, all other historic buildings would have only received stabilization measures; they would not have been used for visitor services or operational needs and would have remained closed to the public. Additionally, cultural resources (including archeological resources, cultural landscape resources, ethnographic resources, and collections) would have been managed only so that their conditions do not substantially degrade. Treatments to the cultural landscapes at the segregation center site and Camp Tulelake, such as rehabilitation and restoration of character-defining features, would not have been conducted. Natural resource management would have been minimal to comply with law and policy requirements.

Under Alternative B, the NPS would have continued to prioritize interpretive and educational programs to share Tule Lake's history and relevance with local and regional audiences. Existing partnerships would have been maintained, and new partnerships could have been developed to support and enhance preservation, education, and interpretation about Tule Lake.

Environmentally Preferable Alternative

The environmentally preferable alternative is defined as "the alternative that will promote national environmental policy as expressed in Section 101 of the National Environmental Policy Act." Section 101 states that it is the continuing responsibility of the federal government t0:

- 1. fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
- 2. assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
- 3. attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences;
- 4. preserve important historic, cultural, and natural aspects of our national heritage; and maintain, wherever possible, an environment which supports diversity, and a variety of individual choices;
- 5. achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and
- 6. enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

The Council of Environmental Quality states that the environmentally preferable alternative is "the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources (46 FR 18026 – 46 FR 18038)." According to the NPS NEPA Handbook (2015), through identification of the environmentally preferred alternative, the NPS decision-makers and the public are clearly faced with the relative merits of choices and must clearly state through the decision-making process the values and policies used in reaching final decisions.

The environmentally preferable alternative identified for the Tule Lake Unit was alternative C, the selected alternative. This alternative best satisfies the national environmental goals by providing the highest level of protection of resources while concurrently providing for a wide range of neutral and beneficial uses of the environment. This alternative provides an environment that supports a diversity and variety of individual choices, and it integrates resource protection with an appropriate range of visitor uses and understanding.

Why the Selected Alternative Will Not Have a Significant Effect on the Quality of the Human Environment

The NPS has determined that the selected alternative can be implemented with no significant adverse effects on cultural resources, natural resources, visitor use and experience, unit operations, and socioeconomics. This determination is based on the environmental impact analysis published in the GMP/EA which examined the effects of alternatives A, B, and C.

As defined in 40 CFR § 1508.27, significance of impacts is determined by examining the ten criteria below.

CRITERION 1

Criterion 1 considers the impacts that may be both beneficial and adverse. A significant effect may exist even if the federal agency believes that on balance the effect will be beneficial.

The NPS evaluated the potential environmental consequences of each alternative related to the following topics: cultural resources, natural resources, visitor use and experience, unit operations, and socioeconomics. The impacts associated with the actions in the selected alternative are predominantly beneficial for cultural resources, visitor use, unit operations, and socioeconomics. For archeological resources and natural resources, there could be limited adverse impacts associated with ground disturbance from maintenance and construction activities, but greater beneficial impacts from increased NPS presence and active resource management.

Visitors will benefit greatly from the establishment of onsite visitor facilities and enhancements to the historic scene in the Tule Lake Segregation Center stockade and Camp Tulelake. Archeological resources, historic structures and cultural landscapes, museum collections, and ethnographic resources will benefit greatly from projects to stabilize and treat historic resources for their long-term care and maintenance. NPS operation and all resources, including natural resources, will benefit greatly from increased staffing in these program areas. Socioeconomics will also benefit from increased visitation and NPS staff in the area, helping to support and increase economic activity in the local area.

Minor adverse impacts were also identified for some of these actions. Some potential adverse impacts to resources were identified from increased visitor use, but they would be insignificant due to the unit's greater capacity to see and respond to the issues immediately. Impacts identified were short-term in nature, resulting primarily from construction activities for facility improvements. These impacts will be mitigated through monitoring, careful siting, restoration, visitor capacity guidance, and other measures.

CRITERION 2

Criterion 2 considers the degree to which the proposed action adversely affects public health or safety.

The selected alternative will not adversely affect public health or safety. Several of the actions will benefit public health and safety, including the addition of ranger staff,

enhanced visitor education and interpretation, and improvements to maintenance operations.

CRITERION 3

Criterion 3 considers unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

The Tule Lake Unit contains both sensitive cultural resources and areas with sensitive ecological resources, specifically raptors. Resources that contribute to the national historic landmark in the segregation center site would receive treatments to ensure their long-term protection. These types of resources are among the values that the selected alternative will enhance and protect through increased staffing, restoration activities, and interpretation and education. No significant adverse impacts to these resources resulting from the selected alternative have been identified.

CRITERION 4

Criterion 4 considers the degree to which effects on the quality of the human environment are likely to be highly controversial.

No highly controversial effects resulting from actions proposed in the alternatives were identified during the initial public scoping, preparation of the environmental assessment, or during the public review of the GMP/EA.

CRITERION 5

Criterion 5 considers the degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks.

There were no highly uncertain, unique, or unknown risks identified during either the preparation of the environmental assessment or the public review period.

CRITERION 6

Criterion 6 considers the degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

The selected alternative neither establishes a precedent for future actions with significant effects nor represents a decision in principle about a future consideration. Future actions not addressed in the GMP will require additional environmental impact analysis and, if different than the GMP, amendment to the GMP.

CRITERION 7

Criterion 7 considers whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significant impacts cannot be avoided by terming an action temporary or by breaking it down into small component parts.

Other past, present, or reasonably foreseeable actions were analyzed for their potential to contribute to cumulative impacts in association with implementation of the selected alternative. The selected alternative seeks to ameliorate the adverse effects associated with proposed actions so that the overall level of cumulative impact under each impact topic will either be arrested or will decline compared to the no-action alternative. The effects of the selected alternative will comprise a very small component of these cumulative impacts. Overall, the impacts of the selected alternative, combined with the negligible to major adverse impacts from other past, present, and reasonably foreseeable future actions, will not result in a significant cumulative adverse effect.

CRITERION 8

Criterion 8 considers the degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historic resources.

Overall, protection of historic structures and cultural landscape features that contribute to the Tule Lake National Historic Landmark, National Register-eligible Camp Tulelake, and other significant historic resources will be greatly improved through the selected alternative.

CRITERION 9

Criterion 9 considers the degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.

There is no documentation of the presence of federally listed threatened or endangered species within the Tule Lake Unit.

CRITERION 10

Criterion 10 considers whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.

The selected alternative will not violate federal, state, or local environmental protection laws.

Public Engagement and Agency Coordination

Public Engagement

Public involvement and consultation efforts were ongoing throughout the process of preparing this GMP/EA. Public involvement methods included conducting public meetings and workshops, holding stakeholder meetings, distributing newsletters, posting planning information on appropriate websites, posting information at the Tule Lake Unit and in community locations with an association with the Tule Lake Unit, and sending press releases. The public had two formal avenues for participation in the development of the plan: participation in public meetings and opportunities to provide comments on information presented in newsletters and the GMP/EA.

The NPS launched the GMP planning process in 2013. The official public scoping period was initiated on May 31, 2013 and closed on October 11, 2013.

On November 3, 2016, the GMP/EA was released for public review, with the review period ending on February 28, 2017. The executive summary newsletter, announcing the comment period and public meeting, was sent to all organizations and individuals on the GMP mailing list, with instructions for accessing the full document online via the National Park Service's Planning, Environment and Public Comment (PEPC) website. Hard copies of the full draft were sent to agencies, consulting parties, organizations, stakeholders, and those individuals and organizations who requested them. Approximately 180 copies of the printed GMP/EA and 2,000 copies of the newsletter were mailed out. Another 400 copies of the newsletter and 250 copies of the printed GMP/EA were handed out (or made available on request) to meeting attendees, visitors, and stakeholders. An email with links to the document on PEPC was sent out to 1,300 individuals and organizations who had expressed preference for receiving GMP updates via email.

Press releases announcing the availability of the document and asking for public comment were sent to 140 local, regional, and national newspapers and radio stations, as well as to local chambers of commerce, public libraries, and community bulletin boards for posting. Announcements were also made on the Tule Lake Unit's website, Facebook page, and Twitter feed. A short video was also published on the NPS's Tule Lake Unit media platforms.

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. Public meetings were held in Tulelake, CA (two meetings); Klamath Falls, OR; Los Angeles, CA; Carson, CA;

Sacramento, CA (two meetings); San Francisco, CA; San Jose, CA; and Seattle, WA. Meetings in Portland, OR and Hood River, OR were cancelled due to winter weather. Two virtual meetings were held to provide forums for receiving public comments for those who were not able to physically attend a meeting. At one of the virtual meetings, a venue in New York City was arranged for attendees.

COMMENT SUMMARY

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. Agencies, organizations, and businesses that submitted official comments include: 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; 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; and Wong Potatoes.

Overall, the vast majority of commenters supported the preferred alternative's approach for visitor and resource management at the segregation center site, Camp Tulelake, and the Peninsula. Those who stated rationales for supporting the preferred alternative grounded their comments in the need to share Tule Lake's unique history with visitors. Similarly, the vast majority of commenters supported the alternative's focus on developing the segregation center site into the primary visitor and operational center for the Tule Lake Unit. Some commenters expressed disagreement with federal and NPS spending on the Tule Lake Unit. Some wanted the NPS to allow unescorted access to the Peninsula, although the NPS does not have the authority to change the current policy relating to public access. Some people made it clear they disagreed with any boundary modification to enlarge the Tule Lake Unit, though the preferred alternative stated that no boundary expansion proposal is included in the GMP/EA.

The public meeting comments can be accessed on the <u>Tule Lake Unit GMP/EA website</u> at http://parkplanning.nps.gov/TuleLakeGMPEA. Minor edits and text corrections to the GMP/EA derived from public comments and consultations are incorporated in the selected alternative and documented in Errata, prepared as a technical attachment to the EA.

Agency Consultation

The Endangered Species Act of 1963, as amended, authorizes federal agencies to enter into early consultation with the USFWS to ensure that any federal action will not jeopardize the existence of any listed species or destroy or adversely modify its habitat. During the preparation of this plan, NPS staff initiated consultation with the Sacramento and Klamath Falls U.S. Fish and Wildlife offices in June 2013 to determine what threatened and endangered species should be considered during preparation of the EA. During the public review period for this EA, additional consultation with the USFWS occurred. Because there are no listed threatened or endangered species found within the unit and analysis herein has shown that there would be no effect on any species listed or proposed as threatened or endangered, no further consultation with the USFWS is necessary under Section 7 of the Endangered Species Act.

For this GMP, the NPS used the process and documentation required for the preparation of an environmental assessment to comply with Section 106 of the National Historic Preservation Act (NHPA) in lieu of the procedures set forth in 36 CFR § 800.3 through 800.6. (36 CFR § 800.3 (3)). To meet the requirements of Section 106 consultation, the NPS instituted early scoping with agencies, stakeholders, and the interested public. The NPS identified and engaged interested parties including individuals, groups, and communities associated with Tule Lake's history prior to and during public scoping. The NPS held public meetings in the local Klamath Basin communities and along the West Coast where there are known populations of Tule Lake survivors and people associated with Tule Lake's history. Historic preservation issues raised during the course of the planning process by the public and consulting parties were considered in the development of the alternatives and impact analysis. Additionally, the NPS notified the public about its intent to use the NEPA process for Section 106 purposes in a publicly distributed e-newsletter on August 24, 2016. The results of the impact analysis are articulated in this environmental assessment using methods and terminology appropriate to NHPA. The GMP/EA identified the Area of Potential Effect and included a preliminary determination of effect to historic properties for the preferred alternative as "no adverse effect." It also stated that subsequent Section 106 reviews will be necessary to implement site-specific actions and mitigations to ensure consistency with the Secretary of the Interior's Standards for the Treatment of *Historic Properties* as stated in 36 CFR § 800.5 (3)(b).

In June 2013, the NPS notified the California State Historic Preservation Office (SHPO) of the agency's intent to prepare a GMP and invited representatives of the SHPO to participate in the scoping process. SHPO staff attended meetings and participated in scoping. In December 2013, the NPS met with SHPO staff to discuss the GMP. The NPS

briefed the SHPO on the GMP in May 2016. In August 2016, the NPS notified the California SHPO of the agency's intent to use the NEPA process for Section 106 purposes in accordance with 36 CFR Part 800.8(c). During the public review period for this EA, the NPS consulted with the SHPO to meet the remaining requirements of 36 \(\) CFR 800. The NPS also consulted with the Advisory Council on Historic Preservation and other interested parties for review and comment related to compliance with Section 106. In a letter dated December 7, 2016, 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.

The park and planning team also met regularly with the USFWS throughout the planning process because of the shared management responsibilities for Camp Tulelake and the Peninsula. In a letter dated April 11, 2018, 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.

In addition, members of Congress, Modoc County Board of Supervisors, City of Tulelake, and other public officials were provided with project updates at public scoping and release of the GMP/EA through in-person meetings, phone meetings, and through electronic communication.

Native American Consultation

The NPS consulted with traditionally associated American Indian tribes and groups in developing the GMP. These include the federally recognized Modoc Tribe of Oklahoma and the Klamath Tribes. During the public scoping period NPS staff invited the Klamath Tribes and Modoc Tribe of Oklahoma to discuss the general management planning process underway and any concerns they might have about protecting, preserving, and managing Tule Lake Unit's resources. The NPS consulted with the tribes in preparation of the GMP/EA, with a specific focus on actions on the Peninsula. As part of the review for the GMP/EA, the NPS conducted in-person consultations with the Klamath Tribes in Chiloquin, OR on February 16, 2017 and with the Modoc Tribe of Oklahoma in Miami, OK on May 15, 2017.

Conclusion

Based on the environmental analysis as documented in the EA, together with the capability of the mitigation measures to avoid, reduce, or eliminate impacts, and with due consideration for the nature of public comments, the NPS has determined that the approved plan is not a major federal action significantly affecting the quality of the human environment. Negative environmental impacts that could occur are not significant. There are no unacceptable impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial environmental consequences, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the selected alternative will not violate any federal, state, or local environmental protection law.

Based on the foregoing, it has been determined that an environmental impact statement is not required for this general management plan and thus will not be prepared. Plan elements, programs and other activities can be implemented as soon as practicable but not sooner than 30 days following the date of the approval of the general management plan.

Recommended:

Lawrence J. Whalon Jr., Superintendent, Tule Lake Unit

Date

Approved:

Stan Austin, Regional Director, Pacific West Region

Date