



September 6, 2023

Camille Garibaldi, Regional Lead
Environmental Protection Western-Pacific Region
Federal Aviation Administration
777 S. Aviation Blvd., Suite 150
El Segundo, CA 90245

Laurie Suttmeier, Manager
Amy L. Choi, Assistant Manager
San Francisco Airports District Office
2999 Oak Road Suite 200
Walnut Creek, CA 94597-7776

RE: Response to FAA Proposed Perimeter Fence Project, Tulelake Municipal Airport, Modoc County, California – Reference FAA_2013_0322_001

Dear Ms. Garibaldi, Ms. Suttmeier and Ms. Choi:

I write on behalf of the Tule Lake Committee (TLC) in response to your 2023 letters of August 9 and August 24 to the California State Historic Preservation Officer (SHPO), Ms. Julianne Polanco, regarding NRHP eligibility of the TLSC Traditional Cultural Property (TCP). The TLC believes this site is eligible under Criteria B and Criteria D, as set forth below. With the assistance of our pro bono resources consultant, Janet P. Eidsness, M.A., we submit additional information concerning such eligibility.

We are an all-volunteer non-profit organization that represents survivors of incarceration at Tule Lake and the descendants of those imprisoned at the only concentration camp among 10 to become a maximum-security segregation center used to punish 15,000 Japanese Americans who dared to protest the injustice of the race-based incarceration. Our mission is preservation of the site and the still little-known story of civil rights protest that made Tule Lake a unique place in America's history.

The TLC and its supporters object to the on-going desecration that is the operation of the airfield used mainly for crop dusting that overlays the former TLSC prisoner housing area, where memories are imprinted in the outlines of the former road network and outlines of barracks and blocks.

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In support of TLSC TCP eligibility for the NRHP under Criteria B, we are providing additional information about a number of Japanese American individuals and community leaders associated with TLSC who made significant accomplishments, per National Register Bulletin guidance cited in your August 9th letter (3rd paragraph).

In regard to Criteria D, we are puzzled by your lack of acknowledgement or response to our February 10, 2023 letter discussing recent research at the TLSC residential area that identified dozens of buried rooms and features using ground penetrating radar (Bishop 2021, see Attachment 1). These archaeological features have high potential to yield information important to the history of how Japanese Americans coped with their incarceration.

Considering Criteria B and evaluating an individual's achievements

The FAA's view of who and what is significant in our past appears, in their evaluation of Tule Lake, to be confined to a view of the world that does not consider people of color as "significant." Japanese Americans who were prominent or important at Tule Lake may lack significance to the FAA, however, their words and acts had enormous significance to others. The historic context for the TLSC has yet to be written, a failure of the Sikes and Arrington study.

It is important that the context avoid adopting the biased narrative of Jim Crow racism that erased the histories and significance of the more than 27,000 Japanese Americans who were incarcerated at Tule Lake from June 1942 to March 1946, when it closed. After decades when individuals imprisoned at Tule Lake were stigmatized and eliminated from the historical narrative, the incarceration story is undergoing a correction, shifting from an over-reliance on wartime propaganda to a re-interpretation that includes the point of view of the imprisoned. Scholars and writers have begun unearthing archival documents, writing books and articles focused on those who protested and led resistance efforts in the camps.

No longer anonymous ciphers, Japanese Americans who courageously spoke out and organized and filed lawsuits to resist government injustice are finally being remembered. The compilation of individuals below are just a few examples of Japanese Americans whose lives were significant within Tule Lake, who conform to Criteria B standards — "persons associated with the property must be individually significant within a historic context."

Mitsuye Endo was incarcerated at Tule Lake when she filed a habeas corpus petition, *Ex parte Mitsuye Endo*, the plaintiff in the only Japanese American case that successfully challenged the wartime incarceration, in a unanimous U.S. Supreme Court ruling that the government could not continue the indefinite detention of loyal citizens. One day before the December 1944 Endo decision was announced, the exclusion and detention orders were rescinded.

At Tule Lake, the news caused conflicting rumors, confusion and fear of vigilante violence outside the camps. Army representatives surveyed inmates, asking if they planned to renounce their U.S. citizenship and remain in Tule Lake, hinting to thousands of panicked inmates that renouncing their citizenship would enable them to remain in Tule Lake. Not knowing that renouncing their seemingly worthless citizenship legalized their deportation, renunciants fought for decades to regain what they had given up, burdened throughout their lifetimes stigmatized with the shame of “disloyalty.”

Masaaki Kuwabara was one of 26 draft resisters at Tule Lake, the named defendant in the government’s prosecution of draft resisters, *U.S. v. Masaaki Kuwabara*, the only WWII draft prosecution where the defendants were not convicted. The judge dismissed the charges, writing that it was “shocking to the conscience” to incarcerate American citizens with no charges or evidence of disloyalty, to induct them into the Army that imprisoned them, and to prosecute them for refusing. The government did not appeal the decision, and Tule Lake’s draft resisters were returned to incarceration at Tule Lake.

Tadayasu Abo was among the 5,500 individuals at Tule Lake who renounced their U.S. citizenship, and was the named plaintiff in *Abo v. Clark*, a class action lawsuit to restore their citizenship, ab initio, and void the Department of Justice’s renunciation and deportation program. It was a case the renunciant’s main advocate, Wayne Mortimer Collins fought for 20 years, restoring birthright citizenship to all but a handful of men and women who sought its restoration.

George Kuratomi led thousands of Japanese American protesters imprisoned in Arkansas to protest the government’s misguided and incompetently administered loyalty questionnaire. While segregated at Tule Lake, Kuratomi had a key role in the Daihyo Sha Kai, organized to challenge the War Relocation Authority’s abuses. His activities, reported in thousands of archival documents, compelled Tule Lake’s director Raymond Best to negotiate improvements in labor, health and safety matters. But, racially-biased wartime propaganda interpreted leadership to improve living and working conditions of the imprisoned as “troublemaking.” Kuratomi was deemed as disloyal and thrown into Tule Lake’s infamous stockade for nearly 9 months.

Violet deCristoforo was, before WWII and the incarceration, an accomplished poet, writer and bookstore owner. Her poetry and righteous criticisms of government abuses were interpreted by racist government officials as the subversive urgings of a dangerously histrionic woman. Deported to Japan for her outspokenness, her published work remembers the hardships she and her family endured at Tule Lake.

Ernest Kinzo Wakayama was a veteran who fought in WWI, who, with his wife Toki brought the first legal challenge opposing the unjust forced removal, a habeas corpus petition that was granted a hearing. The Wakayama's decided to drop the case, yet he was segregated to Tule Lake. After being targeted by a social scientist who reported he had not renounced but encouraged others to do so, and told of being forced at gunpoint to renounce his U.S. citizenship. Demonized as an "enemy alien," Wakayama was deported to Japan, and for many decades, his story erased.

Joseph Kurihara was an Army veteran outraged by the government's failure to live up to the Constitution he fought for in WWI. He protested the injustice of his incarceration and wrote about America's racial and social injustice in the social scientist's 1946 study of Tule Lake. After the war moved to Japan where he lived the remainder of his life, believing America's promise of justice and equality did not extend to persons of Japanese ancestry.

James Okubo enlisted in the Army while incarcerated at Tule Lake and awarded a Congressional Medal of Honor, the highest recognition given for military service. But, Okubo's valor was not acknowledged by the local Tulelake community. Okubo's Medal of Honor was the only one recorded in the entire history of Modoc or Siskiyou county, yet, he was excluded from a local veteran's memorial wall built with state funds.

Other Japanese American individuals incarcerated at Tule Lake were either well-known or remained influential. **George Takei** is a famous actor with millions of fans. **Tommy Kono** began lifting weights in Tule Lake, and later broke weightlifting records at the Olympics. Medical researcher **Harvey Itano** was the 1942 valedictorian of his class at UC Berkeley, but was unable to matriculate with his graduating class as he was incarcerated at Tule Lake.

We ask the FAA to acknowledge the significant accomplishments and contributions of the above Japanese Americans, and find that the TLSC TCP is eligible under Criterion B. The isolated judgement of ineligibility under Criteria B, made without broader consultation and knowledge, should not be used to perpetuate the continued erasure and desecration of the Tule Lake site.

Considering Criteria D: Incomplete Historic (Archaeological) Identification Effects and Assessment of Effects Relevant to Eligibility of TLSC TCP

Sikes and Arrington (2022) failed to conduct a systematic subsurface archaeological survey and ignored the issue of eligibility under Criteria D, a puzzling and significant lapse. Given Tule Lake's significance as an American civil rights site, it is remarkable that a comprehensive archeological and cultural resource review is not a priority. The FAA's inventory of historic properties significant under Criterion D in the Direct (and Indirect) Areas of Potential Effects (APE) associated with the TLSC TCP has not undergone a mapping of sub-surface features, and consequently, is incomplete and defective.

Archaeological research is necessary to reveal what is under threat and being destroyed by the Tulelake airfield. As stakeholders in the FAA's evaluation of the historic significance of the TLSC site, the TLC descendant community cannot fathom why recent research data we provided was ignored by Ms. Choi in her August 24, 2023 comments.

The February 10, 2023 letter and attachment prepared by TLC consultant Eidsness includes archaeological data from 2019-2022 field investigations led by Caitlin Bishop, whose field research at TLSC involved a single 6-acre residential block, one among 77 blocks at Tule Lake that imprisoned over 18,000 prisoners. Her awareness of subterranean rooms below former barracks used as places to hide, escape the heat, find privacy, or conceal personal items, was learned doing excavations at Manzanar National Historic Site (Burton 2002), from oral history narratives and knowledge of remote sensing.

The former prisoner housing area, a component of the TCP, Historic District and NHL, offers significant archaeological research potential "vital to understanding the reality of incarceration at Tule Lake Segregation Center." (Bishop 2022:12). Other research found evidence of an underground cellar at TLSC Block 18 adjacent to the Airport runway, and an oral history of resistance leader George Kuratomi describing his experience during martial law, of hiding in underground rooms to avoid detection and arrest.

In 2018, SHPO Polanco (2018:2) responded to Sikes et al. initial survey report (2017) and requested a suitable image showing where the proposed fence alignment is "in relation to all remnants, foundations, and other contributors to the TLSC." The request for a map was not met. Instead, the consultant (Sikes & Arrington 2022) produced a simple pedestrian survey of the proposed fence location and an aerial map (Figure 6, pg. 54) depicting obvious surface features (latrine slabs, guard tower footings, and remnants of original security fencing).

Of the three earlier airfield consultant surveys paid for with FAA funds, none recorded discrete historic features associated with the TLSC (ECORP 2002; Jensen 2010; Vann 2007) (Sikes and Arrington 2022:53, Footnote 15).

Nearly 75 years have gone by since Tule Lake closed. The FAA's continued destructive, incompatible use of this sacred site where 331 men, women and children died from inadequate medical care, illness and despair, is a sad reminder of the racism, failed leadership and greed that enabled creation of America's concentration camps. The grotesque decision to bulldoze the barracks, fill in the pits and rooms beneath them, then build an airfield for crop-dusters that seeks to erase the Tule Lake site perpetuates the trauma for another generation of Japanese American descendants.

We ask the FAA to recognize the significance of the 1988 Presidential apology and redress to Japanese Americans, that recognized the great injustice of incarcerating innocent people because of their race and ethnicity. We ask that you please honor the Tule Lake site. Do not desecrate it.

I have attached a copy of Caitlin Bishop's (2021) study that surveys Blocks 81, 82, 83 and 56 in the "Alaska" section of TLSC housing area, as an example of the work the FAA might consider in its legal responsibility to identify and evaluate buried archaeological resources in the Direct APE. We also request that you review the comments of our resource consultant Ms. Eidsness, submitted by the Tule Lake Committee last February 10, 2023.

We appreciate your attention.

Sincerely yours,



Barbara Takei
on behalf of the Tule Lake Committee

Attachments:

Caitlin Bishop 2021 Master's thesis examining Blocks 81, 82, 83 and 56.
Tule Lake Committee Feb. 10, 2023 letter and Eidsness consultant report

cc: follows on next page

cc:

Julianne Polanco, California SHPO (julianne.polanco@parks.ca.gov)
Tristan Tozer, OHP Historian (tristan.tozer@parks.ca.gov)
Mark McClardy Director, FAA Western-Pacific Region (mark.mcclardy@faa.gov)
Janet Eidsness, Resource consultant (jpeidsness@yahoo.com)
Tom King, Ph.D., Resource consultant (tomking106@gmail.com)
Erika Moritsugu, Deputy Assistant to the President and AAPI Senior Liaison
(erika.L.Moritsugu@who.eop.gov)
Philip Kim, White House Public Engagement (philip.Y.Kim@who.eop.gov)
Robert Burkybile, Chief, Modoc Nation (robert.burkybile@modocnation.com)
Betsy Merritt, NTHP (emerritt@savingplaces.org)
Rob Nieweg, NTHP (RNieweg@savingplaces.org)
Christopher Cody, NTHP (CCody@savingplaces.org)
Michelle Magalong, APIIHP (magalong@umd.edu)
Ron Sundergill, Regional Dir. NPCA (rsundergill@npca.org)
Elaine Jackson Retondo, NHL Program Mgr. (elaine_jackson-retondo@nps.gov)
Stephanie Burkhart, Regional Program Mgr. (Stephanie_Burkhart@nps.gov)
Chris Mengel, Superintendent TULE (Chris_Mengel@nps.gov)
Jessica Reid, TULE Resource Mgr. (Jessica_Reid@nps.gov)
Mitch Crosby, Modoc County Airports (mitchcrosby@co.modoc.ca.us)
Phillip Miller, CalTrans, Division of Aeronautics (phillip.miller@dot.ca.gov)
David Inoue, JAACL Exec. Director (dinoue@jacl.org)
Patty Wada, JAACL, NCWNP District Director (pwada@jacl.org)