

Nomination:

Greater Minidoka Area of Critical Environmental Concern



Image: NPS / Stan Honda, Reconstructed barb wire fence near Minidoka Historic Site entrance

**Joshua Vallejos, M.A., Katherine Peck, M.S., Brian Elliott, M.S., Thomas F. King, Ph.D.,
and Rebecca A. Hawkins, M.A.**

12 February 2023



**Algonquín
Consultants, Inc.**



Prepared For



Friends of Minidoka
Board of Directors
P.O. Box 1085, Twin Falls, ID 833303
<http://www.minidoka.org/>

Submitted to
Idaho State Director
Bureau of Land Management
1387 S. Vinnell Way
Boise, ID 83709

Prepared by
Joshua Vallejos, Katherine Peck, Brian Elliot, Thomas F. King, and Rebecca A. Hawkins
Algonquin Consultants, Inc.
57251 East 120 Road
Miami, OK 74354

1. Overview

Friends of Minidoka proposes that the Bureau of Land Management (BLM) establish a Greater Minidoka Area of Critical Environmental Concern (ACEC) to protect approximately 237,000-acres of BLM lands surrounding the Minidoka National Historic Site and Minidoka Relocation Center. The proposed ACEC fits the criteria of relevance, importance, significance, and need for special management required by the BLM to establish an Area of Critical Environmental Concern.¹ The proposed ACEC is located in Jerome, Lincoln, and Minidoka Counties, Idaho. The Minidoka ACEC will protect a sensitive and culturally important site for Minidoka survivors, descendants, the Japanese American community, and our country. The Minidoka Relocation Center and its viewshed have been identified as a Traditional Cultural Property (TCP) eligible for inclusion in the National Register of Historic Places (NRHP).² The Minidoka National Historic Site and its surroundings are the physical place where the experiences of internment can be remembered and memorialized not only by the Japanese American descendant community, but by all Americans who share in common the history of this Nation.



Figure 1 Block 22 at Minidoka National Historic Site, courtesy of Erik and Roland Ninomiya³

¹ U.S. Department of Interior Bureau of Land Management. *Manual 1613*. 29 September 1988. https://www.ntc.blm.gov/krc/uploads/360/5_1613_ACEC_Manual%201988.pdf

² Battaglia, Mario, Rebecca A. Hawkins, and Thomas F. King. "A Landscape of Isolation: A Traditional Cultural Property Study of the Minidoka Incarceration Facility and Surrounding Viewsheds, with Recommendations as to its Eligibility for Listing in the National Register of Historic Places, Jerome County, Idaho." Prepared by Algonquin Consultants Inc., 2 December 2022.

³ Photo courtesy of Erik and Roland Ninomiya, Minidoka Descendants, Friends of Minidoka blog: https://www.minidoka.org/blog/2022/10/31/descendant-reflections-by-erik-and-roland-ninomiya?blm_aid=27237.

The proposed ACEC is located in southcentral Idaho, north of the Snake River. It includes scenic, cultural, and wildlife values of significant national importance, which can be and are being used to interpret the experiences of Japanese Americans incarcerated at the Minidoka Relocation Center during World War II.

In BLM interviews with Japanese Americans, the BLM reported that Minidoka is sacred ground that provides a “sense of place and remembrance that resonates with visitors to the NHS. In addition, the vast open landscape and isolation add to the educational and emotional narratives.”⁴ Minidoka survivors, descendants, and partners have identified Minidoka’s sense of isolation, remoteness, and viewshed as important public values.⁵

Without further protections, the Greater Minidoka landscape is vulnerable to developments that could mar and alter the fundamental visual nature of the viewshed. Any substantial piece of Federal land over which the wind blows can be amenable to development by the wind energy industry, for example, and the land comprising Greater Minidoka is no exception. At the present time, Minidoka is experiencing an immediate threat from the proposed Lava Ridge wind project.

The Shoshone Field Office (SFO) is processing an application from Magic Valley Energy (MVE), LLC, an affiliate of L.S. Power, which is seeking authorization to use public lands to construct, operate, maintain, and decommission the Lava Ridge Wind Project.⁶ Any construction by this or similar types of projects that would impact the Greater Minidoka viewshed will damage Minidoka’s ability to serve as a place for learning, commemorating, and healing for the Japanese American community, the Asian American Pacific Islander community, and the nation as a whole.

The National Park Service has also identified the Lava Ridge project’s significant negative impacts on Minidoka National Historic Site, “primary amongst them is the potential for this project to negatively affect the historical integrity of Minidoka NHS, especially the setting, feeling, and association.”⁷ According to the National Park Service:

The Lava Ridge Project would fundamentally change the psychological and physical feelings of remoteness and isolation one experiences when visiting Minidoka NHS, as the lands north would be transformed into a large-scale renewable energy site marked by hundreds of wind turbines, transmission towers and associated ancillary infrastructure. Approaching the site and walking its grounds, visitors would no longer experience the

⁴ Report prepared by the Langdon Group for the BLM Shoshone Field office, “Lava Ridge Wind Project Stakeholders Assessment and Engagement Report,” 2022, p. 2-3, aka the Langdon Group Report.

⁵ Friends of Minidoka, Public Comment Scoping Letter, dated October 20, 2021, Minidoka Pilgrimage Planning Committee “Survivors Letter,” Public Comment Scoping letter, dated October 20, 2021, the BLM Langdon Group Report, written and verbal comments submitted to the BLM’s Lava Ridge Subcommittee, and BLM Lava Ridge Wind Project Environmental Impact Statement Final Scoping Report, December 2021.

⁶ Langdon Group *Lava Ridge Wind Project Stakeholder Assessment and Engagement Report* 2022. p. 2.

⁷ Wade Vagias, National Park Service, Letter to the Community, dated September 12, 2021

feeling of a rural, undeveloped landscape recalling what Minidoka was like during World War II. Additionally, the night skies at Minidoka are integral to its cultural and historical fabric. The NPS is concerned that night skies will be impacted by light sources emanating from the project, thereby altering visitors' experience and capacity to see the nightscapes experienced by those who lived at the camp during World War II.⁸

The proposed ACEC also includes Indigenous ancestral sites and essential habitats for threatened and migrating species.

2. BLM ACEC Requirements

According to the Federal Land Policy and Management Act (FLPMA) section 103, ACECs are:

...areas within the public lands where special management attention is required (when such areas are developed or used or where no development is required) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards.⁹

ACEC designation relies on the area in question meeting criteria for relevance, importance, and special management attention. These criteria are defined in BLM Manual 1613 – Areas of Critical Environmental Concern.¹⁰ A proposed ACEC meets the BLM's "relevance" criterion "if it contains one or more" of several qualities, including "significant historical, cultural, or scenic value," "a fish and wildlife resource," "a natural process or system," and/or "natural hazards." A proposed ACEC meets the BLM's "importance" criterion if the resource "has more than locally significant qualities" and "has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened, or vulnerable to adverse change," "has been recognized as warranting protection," "has qualities that warrant highlighting," and/or "poses a significant threat to human life and safety or to property." Finally, a proposed ACEC meets the "special management attention" criterion if it requires "management measures" which are "unique to the area involved and include terms and conditions specifically to protect the important and relevant values occurring in that area."

After an ACEC is nominated, FLPMA requires that BLM evaluate it with an interdisciplinary team to ensure that the proposed ACEC fits the statutory definition^{11, 12}. Resources are evaluated based on several criteria, including, for instance, the degree of degradation already present at the

⁸ *Ibid.*

⁹ U.S. Department of the Interior, Bureau of Land Management. *The Federal Land Policy and Management Act of 1976*, as amended. U.S. Department of the Interior, Bureau of Land Management, Office of Public Affairs, Washington, DC. Section 103. Both

¹⁰ BLM. *Manual 1613*.

¹¹ *Ibid.*

¹² BLM. *Memorandum 2023-13*

resource.¹³ After developing a draft land use plan, BLM sets a 90-day public comment period during which citizens can comment on the proposed ACEC.¹⁴ Public comments are incorporated into the ACEC. After the period of public comment, the ACEC is designated by the State Director via a Resource Management Plan if no protests are submitted.

3. How Minidoka Meets BLM ACEC Criteria

The proposed Greater Minidoka Area of Critical Environmental Concern includes imperiled cultural and natural resources that meet BLM's relevance, importance, and special management criteria. A brief background and discussion about each of these resources follows.

3.1 Minidoka Relocation Center

Following the Japanese attack on Pearl Harbor, the U.S. Government built the Minidoka War Relocation Center, a concentration camp in Jerome County, Idaho. After the attack, President Franklin D. Roosevelt issued Executive Order 9066. Under Executive Order 9066, individuals of Japanese descent who lived in “Exclusion Zones” across the West Coast of the United States were forcibly evacuated to “assembly centers” and later to concentration camps (often euphemistically referred to as “relocation centers” or “internment camps”). Throughout the forced removal process, the U.S. government incarcerated approximately 122,000 people in incarceration sites across the U.S.¹⁵

Minidoka Relocation Center was one of these sites. Minidoka was established in 1942 and operated until 1945. Over these three years, the U.S. government incarcerated 10,000 – 13,000 Japanese Americans and other citizens from Oregon, Washington, and Alaska (including 200 people of Alaska Native ancestry) at the site, located near the present-day community of Hunt, Idaho. The site covered approximately 33,000 acres of then-Bureau of Reclamation land, of which 900 acres were covered by over 400 buildings, including residential barracks.¹⁶ Because of the barracks’ subpar construction, conditions were poor, particularly during the summer and winter.¹⁷

Today, the National Park Service manages a portion of the Minidoka Relocation Center as the Minidoka National Historic Site, a unit of the National Park System. It was established in 2008 when Congress passed the Consolidated National Resource Act. The law’s purpose is “to protect, preserve, and interpret the resources associated with the former Minidoka Relocation Center

¹³ BLM, *Manual 1613*.

¹⁴ Bureau of Land Management, “Areas of Critical Environmental Concern.”

<https://www.blm.gov/programs/planning-and-nepa/planning-101/special-planning-designations>

¹⁵ National Archives. “Executive Order 9066: Resulting in Japanese-American Incarceration (1942).” U.S. National Archives, revised January 24th, 2022. <https://www.archives.gov/milestone-documents/executive-order-9066>.

¹⁶ National Park Service. “Life at Minidoka.” Minidoka National Historic Sites revised 19 August, 2019.

<https://www.nps.gov/muin/learn/historyculture/life-at-minidoka.htm>

¹⁷ *Ibid.*

where Japanese Americans were incarcerated during World War II.”¹⁸ The Site includes a visitor’s center, walking trails, interpretive signage, historic buildings, and other features of the concentration camp. BLM manages the remainder of the Camp.

After WWII, the U.S. Government disposed of the land and buildings at Minidoka to non-Japanese American servicemen and local farmers. Although there was an attempt to add the edges of the private land holdings to the Historic Site when it was established. Even though lands immediately adjacent to Minidoka are privately-owned farms, the surrounding landscape remains vital to the Minidoka survivor and descendant community and is part of the NRHP-eligible TCP.¹⁹ Intrinsic to Minidoka’s ongoing historical and cultural significance to the descendant community is the property’s ability to convey the sense of isolation and bleakness, expressed through its remoteness and the expansiveness of its largely unobstructed, wide-open viewshed.

People formerly incarcerated at Minidoka have poignantly described how the expansive landscape within the viewshed (see Figure 1) of the camp is intrinsically tied to the site, particularly to the feelings of loss and isolation they experienced during incarceration.²⁰ “For many, the viewshed is an integral part of the visitor experience. Therefore, significant changes to this expansive, largely unobstructed viewshed would have negative consequences and adverse impacts to the integrity of the TCP.”²¹

People formerly incarcerated at Minidoka and their descendants have continued and will continue to visit the site, for instance, during the annual Minidoka Pilgrimage.²² Academic research has highlighted the importance of commemorative events and pilgrimages for the Japanese American community. Nagata et al.²³ discuss how pilgrimages “provide camp survivors, their children, grandchildren, and the community an opportunity to remember the past, a process that fosters group resilience and survival.” Another recent study has determined that the viewshed of the Minidoka National Historic Site is a TCP. Clearly, preserving both the central Minidoka National Historic Site and the vulnerable Minidoka viewshed landscape as a cultural resource is critical.

3.2 The Viewshed

It is of fundamental importance to the visitor experience at Minidoka that the viewshed – that is, the landscape that can be viewed, night or day, from the site - be kept as unsullied as possible.

¹⁸ “Park planning - Minidoka Internment National Monument General Management Plan November 2006.” Sec. 313

¹⁹ Battaglia et al. 16

²⁰ *Ibid.*

²¹ Battaglia et al. 63

²² Minidoka Pilgrimage. “What We Do.” <https://www.minidokapilgrimage.org/what-we-do>. Accessed November 18, 2022.

²³ Nagata, Donna K., Jacqueline H.J. Kim, and Kaidi Wu. "The Japanese American wartime incarceration: Examining the scope of racial trauma." *American Psychologist* 74, no. 1 (2019): 36.



Figure 2 Photograph of the Minidoka viewshed (photo provided by Robyn Achilles)

In order to quantify the extent of the viewshed, we conducted an analysis using ArcMap 10.8’s Viewshed tool (in the Spatial Analyst extension). ArcMap’s Viewshed tool uses a raster elevation surface and inputs “observer” points to determine the area visible from the observer point at a given height above the ground.²⁴ The state of Idaho’s Digital Elevation Model²⁵ was clipped to an approximately 150 x 120-mile rectangle around Minidoka. The National Historic Site’s Visitor Center was chosen as the observation point for the analysis, with an eye height of 2 meters (approximately 6 feet) and a refractivity coefficient of 0.13 (tool default). The tool was also set to account for the earth’s curvature.

Figure 4 shows the results of this analysis. The viewshed thus projected from the Minidoka Visitor’s Center extends to the borders of the provided clipped raster and includes the mountains to the north and south and some of the buttes and local high points in the Snake River Plain.

²⁴ ESRI. *Viewshed (Spatial Analyst)*. <https://desktop.arcgis.com/en/arcmap/latest/tools/spatial-analyst-toolbox/viewshed.htm>. Accessed November 14, 2022.

²⁵ University of Idaho Northwest Knowledge Network. National Elevation Dataset (NED) for Idaho. <https://data.nkn.uidaho.edu/dataset/national-elevation-dataset-ned-idaho>.

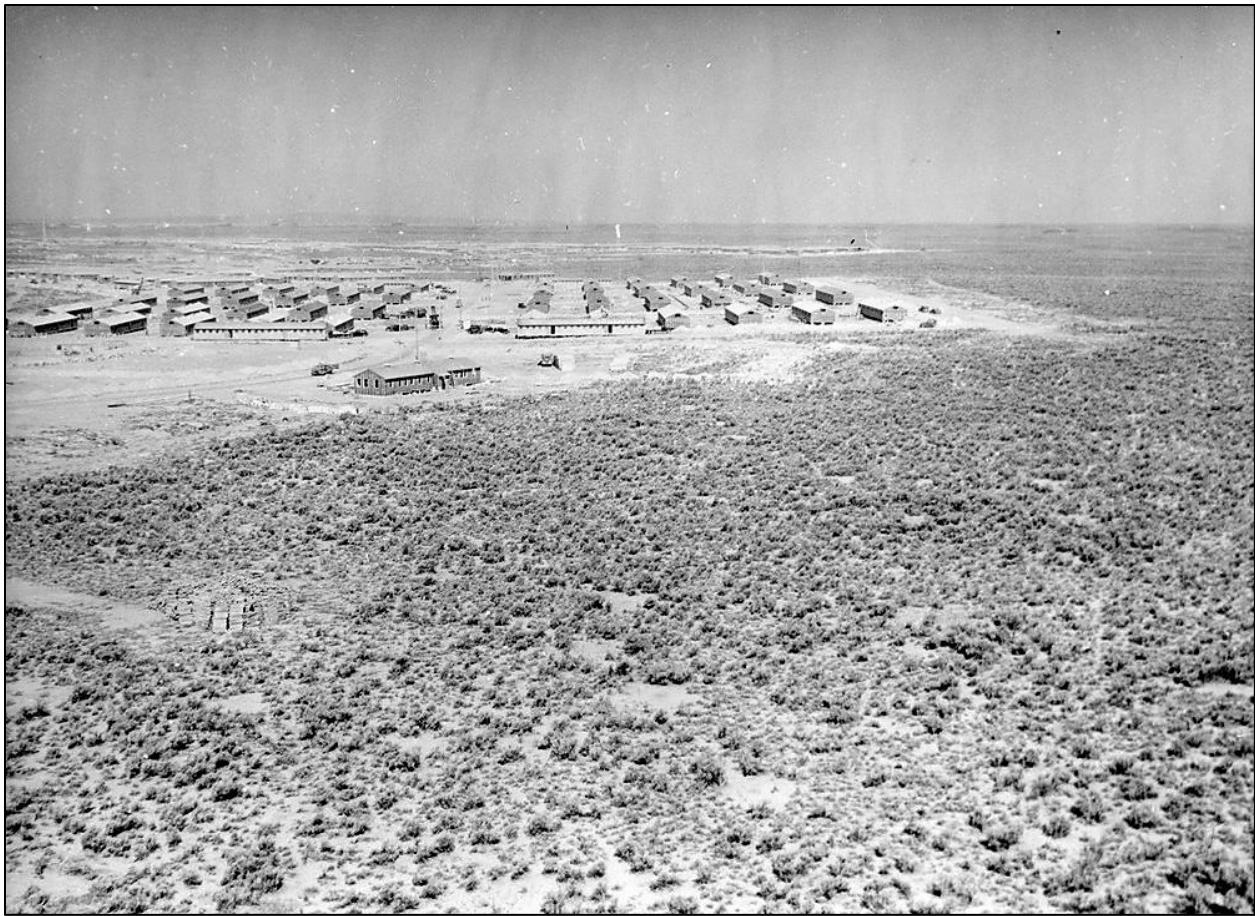


Figure 3 Historical view of the Minidoka concentration camp with expansive surroundings, photo courtesy of Boise State Public Radio article²⁶

3.3 Ancestral Sites of the Snake River Plain

In addition to the Japanese American cultural landscape surrounding the Minidoka National Historic Site, the proposed ACEC boundary contains Indigenous historic places that land use, such as the proposed Lava Ridge wind farm and other developments, will impact.

The volcanic landscape of the Snake River Plain, portions of which are included within this ACEC boundary, is an important region for our understanding of the earliest inhabitants of North America. Wilson Butte Cave, for instance, is an ancient (10,000-15,000 years old) cave site in the Plain, possibly used as a hunting camp.^{28, 29} It was added to the NRHP on November 21, 1974.³⁰

²⁶ “Minidoka National Historic Site makes annual list of nation's most endangered historic places”, Boise State Public Radio. <https://www.boisestatepublicradio.org/news/2022-05-04/minidoka-national-historic-site-endangered-historic-places>.

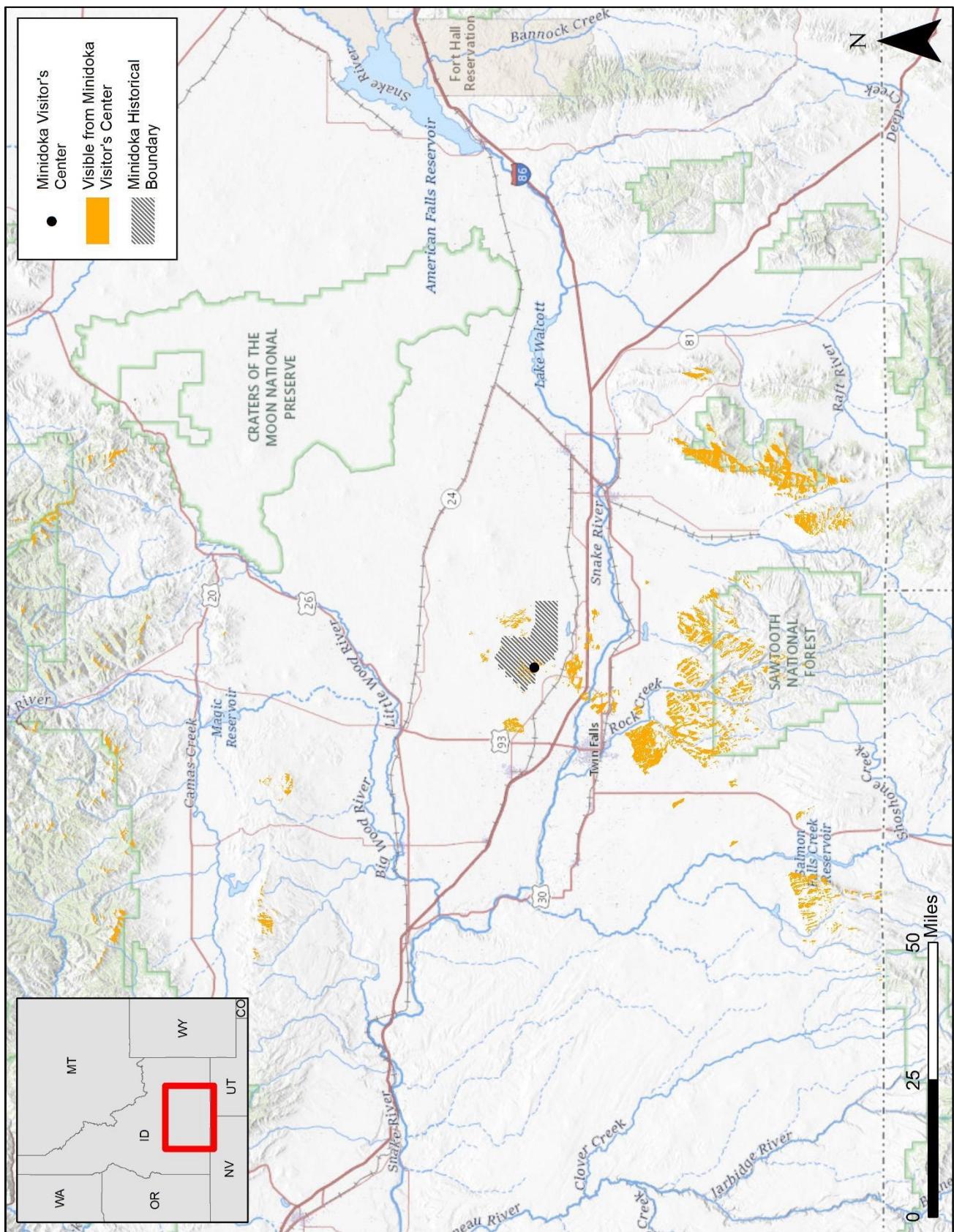


Figure 4 Viewshed from Minidoka National Historic Site

The Snake River Plain produced most of the Clovis period projectile points thus far in Idaho.²⁷ Across this region, paleontologists have also documented fossils of Ice Age megafauna.²⁸ However, no archaeological evidence of a Clovis kill/butchery site has yet been discovered in Idaho.²⁹ Given that the Snake River Plain has a high frequency of both Clovis artifacts and Ice Age megafauna, the likelihood of a Clovis kill/butchery site is very high for this area.

The Snake River Plain is also home to several other special cultural places. Tomcat Cave^{30³¹}, for instance, served as cold storage during the pre-colonial era. The cave is a lava tube that reaches temperatures below freezing year-round, and local Indigenous people used the cave and several others nearby to store meat over a period of thousands of years. This practice is unique in the Snake River Plain because caves that generate year-round below-freezing temperatures are rare at this latitude.³² Given the unique geologic conditions that created Tomcat Cave and related sites near the ACEC, a high potential exists for other caves like these to be documented in the future.

This area contains previously documented cultural sites, both archaeological and those of ongoing importance to living groups that may or may not contain archaeological materials. Other, as-yet undocumented cultural and scientific sites certainly exist. Friends of Minidoka have initiated discussions with the Shoshone Bannock tribe about documenting these sites as well as the traditional indigenous cultural significance of the landscape.

3.4 Natural Resources of the Snake River Plain

The U.S. Fish and Wildlife Service's Information for Planning and Consultation³³ website was accessed on November 7, 2022, to review the likelihood that species listed as federally endangered or threatened and/or their designated critical habitat are found within the proposed Greater Minidoka ACEC. While no designated critical habitat is found within the Greater Minidoka ACEC boundary, two federally listed threatened snail species have potential habitats or documented occurrences within the proposed ACEC: the Banbury Springs limpet (*Lanx* sp.) and the Snake River Physa snail (*Physa natricina*). The Banbury Springs limpet is found in clear, swift, cold, and well-oxygenated water. It is found only in southern Idaho in four cold-spring locations (Thousand Springs, Box Canyon Springs, Briggs Springs, and Banbury Springs), all

²⁷ Charles Speer, Kenneth Reid, Mathew Root, and Richard Hughes., “The Seagull Bay Site—Clovis Technology from American Falls on the Eastern Snake River Plain.” *North American Archaeologist* 40, no. 3 (2019).

²⁸ *Ibid.*

²⁹ Speer et al.

³⁰ L. Suzann Henrikson. “Bison Freezers and Hunter-Gatherer Mobility: Archaeological Analysis of Cold Lava Tube Caves on Idaho’s Snake River Plain” *Plains Anthropologist* 48, no. 187 (2003).

³¹ David Byers, L. Suzann Henrikson, and Ryan Breslawski. “Holocene cold storage practices on the eastern Snake River Plain: A risk-mitigation strategy for lean times.” *Journal of Anthropological Archaeology* 43 (2016).

³² *Ibid.*

³³ Information for Planning and Consultation (IPaC), 2022. Available at <https://ecos.fws.gov/ipac/>. Accessed November 7, 2022.

isolated from each other³⁴. The Snake River Physa snail is a freshwater mollusk found in the middle Snake River of southern Idaho.³⁵

In addition to federally listed endangered or threatened species, one candidate species, the Monarch butterfly (*Danaus plexippus*), also has potential habitat within the proposed ACEC boundary.

The Information for Planning and Consultation website also indicated that several migratory bird species could be present and breeding within the proposed ACEC boundary. These include a notation in the following list if they are a BLM special status species³⁶:

- American White Pelican (*Pelecanus erythrorhynchos*)
- Bald Eagle (*Haliaeetus leucocephalus*) (special status species)
- Black Tern (*Chlidonias niger*) (special status species)
- Cassin's Finch (*Carpodacus cassini*) (special status species)
- Clark's Grebe (*Aechmophorus clarkii*)
- Evening Grosbeak (*Coccothraustes vespertinus*)
- Franklin's Gull (*Leucophaeus pipixcan*)
- Lesser Yellowlegs (*Tringa flavipes*)
- Lewis's Woodpecker (*Melanerpes lewis*) (special status species)
- Long-eared Owl (*Owloasio otus*)
- Marbled Godwit (*Limosa fedoa*)
- Olive-sided Flycatcher (*Contopus cooperi*) (special status species)
- Pinyon Jay (*Gymnorhinus cyanocephalus*) (special status species)
- Rufous Hummingbird (*Selasphorus rufus*)
- Sage Thrasher (*Oreoscoptes montanus*) (special status species)
- Western Grebe (*Aechmophorus occidentalis*)
- Willet (*Tringa semipalmata*)

In addition to these migrating species, the Snake River Plain is home to the north-central population of Greater Sage-grouse (*Centrocercus urophasianus*) and is included among the Greater Sage-grouse management zones.³⁷ As a result, the proposed ACEC contains the second-highest density of sage grouse across the Fish and Wildlife Service's seven management zones. As of 2016:

... sage-grouse are considered “warranted, but precluded” for listing under the United States Endangered Species Act of 1973 (ESA; U.S. Fish and Wildlife Service [USFWS] 2010), Endangered under the Canadian Species at Risk Act, and “Near Threatened” on the International Union for Conservation of Nature (IUCN) Red List.³⁸

³⁴ U.S. Fish and Wildlife Service, 2022. Environmental Conservation Online System (ECOS). Available at <https://ecos.fws.gov/ecp/>. Accessed November 7, 2022.

³⁵ *Ibid.*

³⁶ BLM – Idaho Special Status Animals Species: 2014 Change 1

³⁷ Doherty et al., “Importance of Regional Variation in Conservation Planning.”

³⁸ *Ibid.*, 4.

4. Proposed ACEC Boundaries

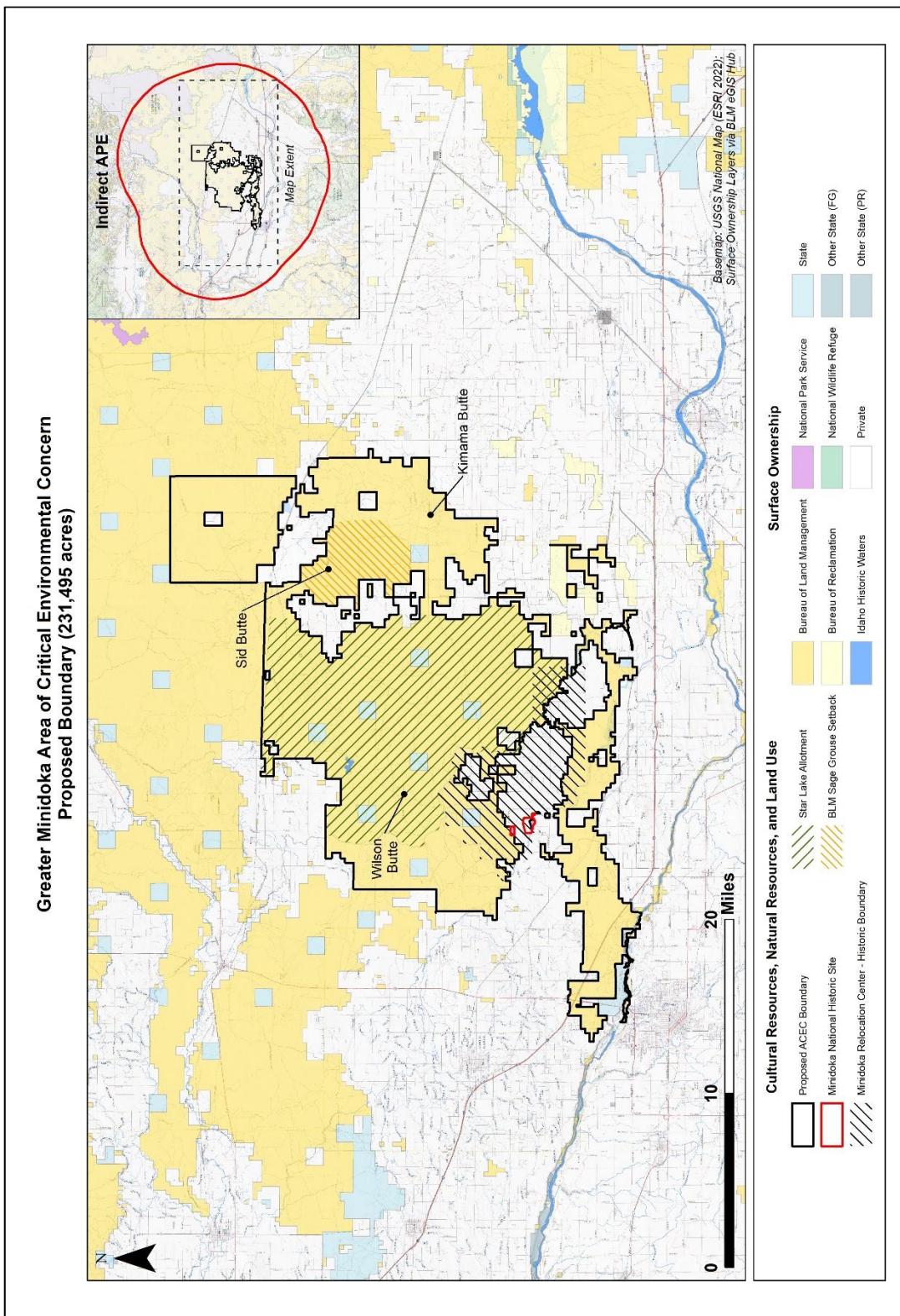


Figure 5 Proposed Greater Minidoka Area of Critical Environmental Concern

Figure 5 shows the proposed boundary of the Greater Minidoka ACEC. The proposed ACEC attempts to preserve the viewshed of the Minidoka Relocation Center, archaeological sites, other locations of cultural importance, and the natural resources of this portion of the Snake River Plain and vicinity. As such, this proposed ACEC includes all BLM Land within the viewshed of Minidoka Relocation Center, the Sid Butte sage-grouse setback, a portion of the Snake River Plain, and Wilson Butte/Wilson Butte Cave.

As per Figure 4, the viewshed from Minidoka spans over 50 miles. Placing large structures such as wind turbines within the proposed ACEC would impact the views from important places within Minidoka National Historic site to the surrounding landscape. In order to quantitatively assess this impact, we also conducted viewshed analyses from several locations (Fig. 6).

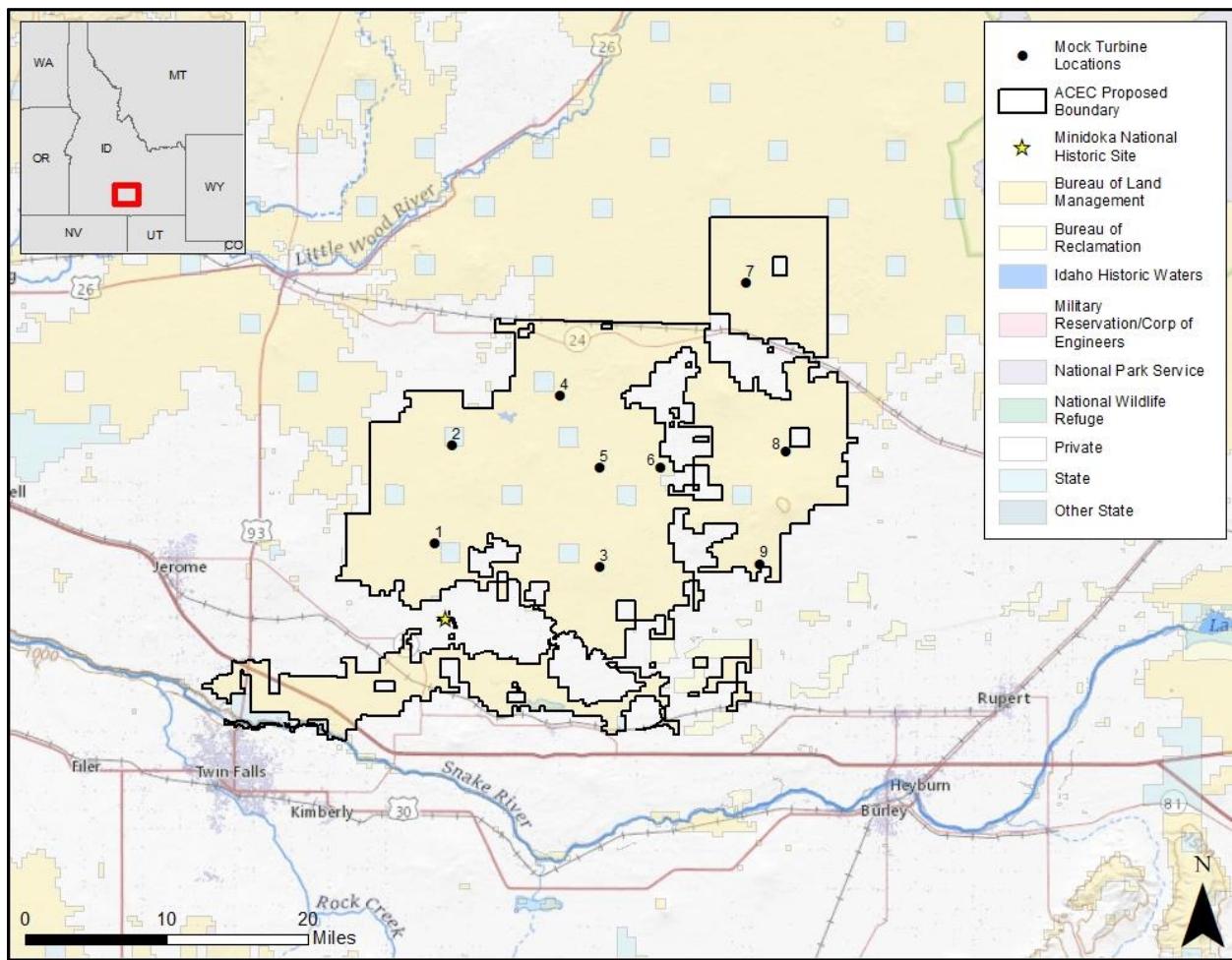


Figure 6 Mock structure locations for viewshed analysis

Figure 6 shows locations representing potential spots where a large structure, such as a wind turbine, might be constructed. Each point was set at 740 ft (225.5 m). The viewshed analysis was conducted using ArcMap 10.8's Viewshed tool, setting the offset for each point to the height of a large structure. This analysis returns a raster representing each point within a Digital Elevation Model (DEM) visible from the top of the structure – and thus a point where the top of the structure can be seen from the ground. The results of each of these analyses was then compared to a map of important, reflective sites within Minidoka National Historic Site (Fig. 7).

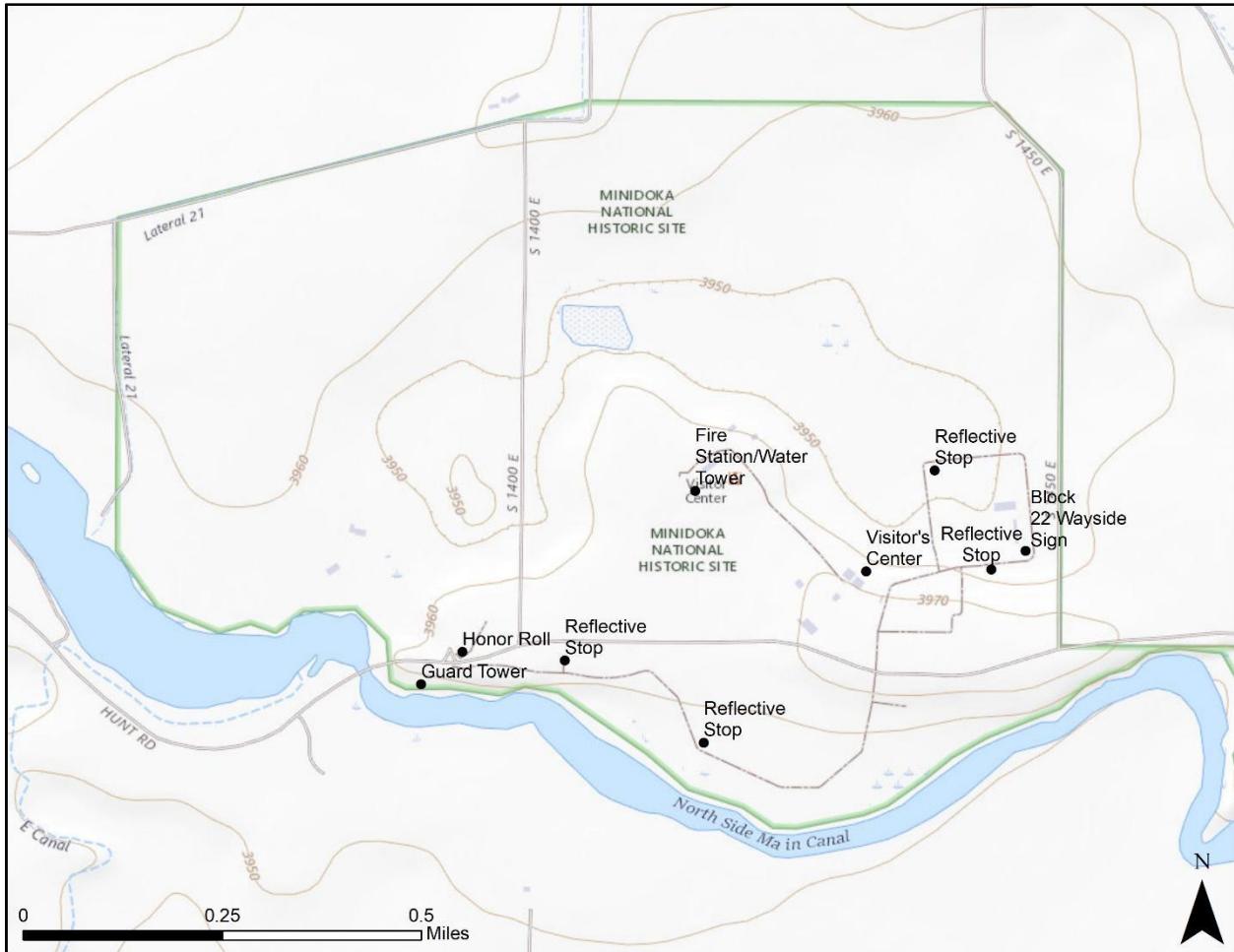


Figure 7 Sites within Minidoka where visitors are likely to stop and observe the surrounding landscape

Figure 8 shows the impact of some of these different potential large structures (1, 4, 7, and 9) on the views from important places within the National Historic Site. The remaining maps are included in Appendix B. A 740 ft structure placed at locations 1-7 and 9 would be visible from some or all of the important points within Minidoka National Historic Site. A structure placed at location 8 would not be visible within the modern boundary of the Historic Site but would be visible within the historical boundary of the Minidoka Relocation Center.

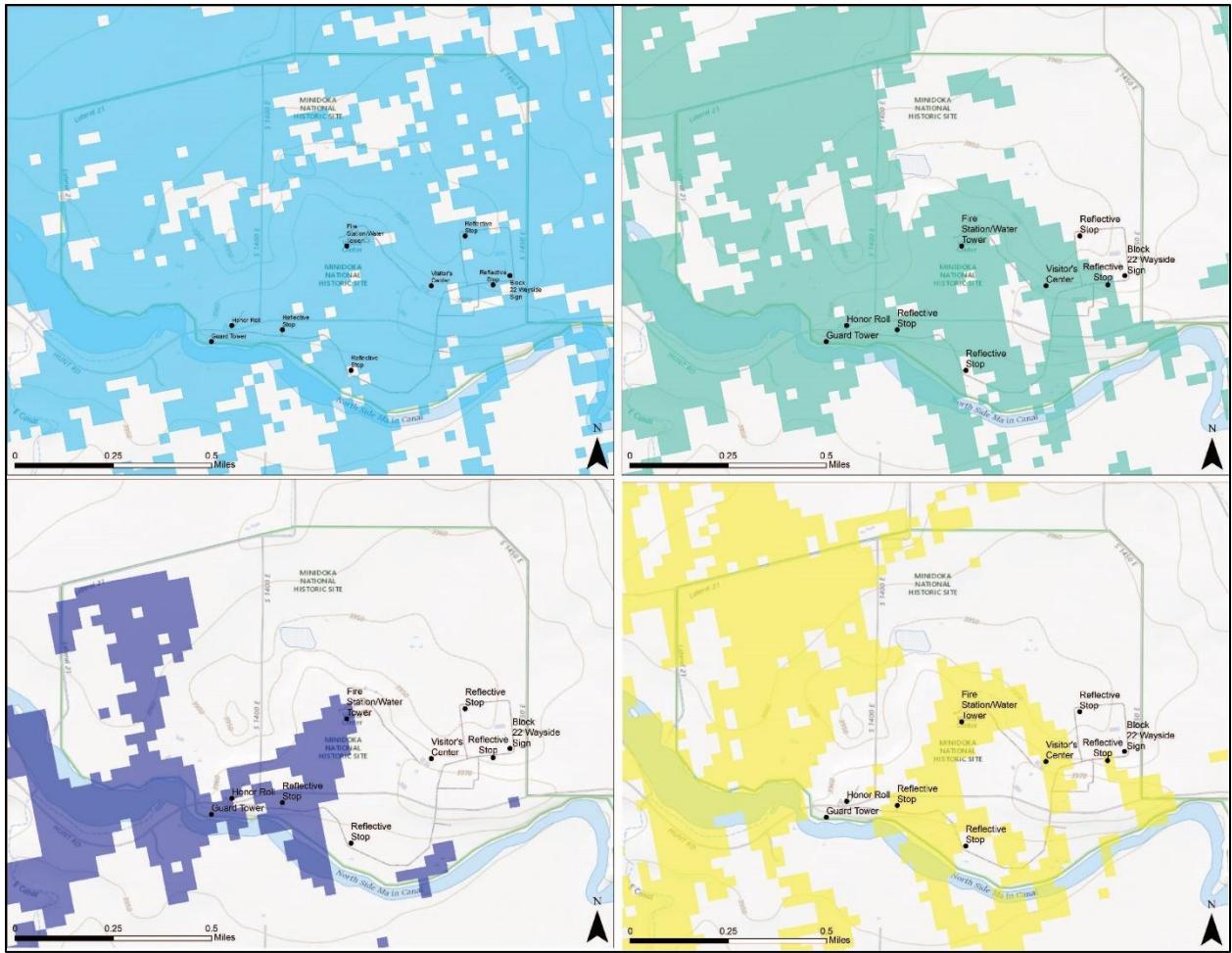


Figure 8 Areas within Minidoka National Historic Site from which structures 1, 4, 7, and 9 (740 ft tall) would be visible.

This viewshed impact remains even with smaller structures. A 490 ft structure would also be visible within the National Historic Site from all locations except 7 and 8 (see Fig. 9 and Appendix C). Structures at these locations would still be visible within the historical boundary of the Minidoka Relocation Center.

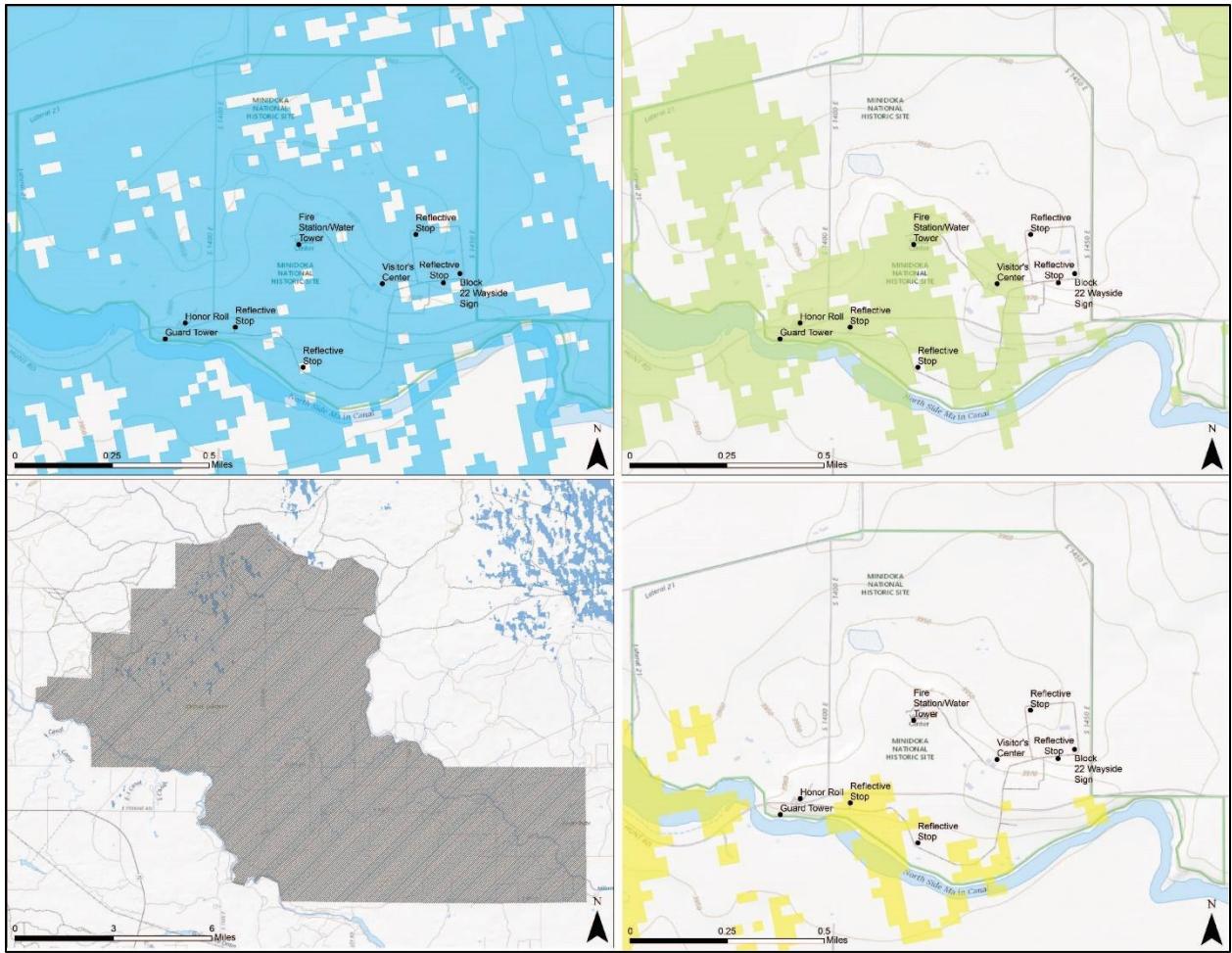


Figure 9 Areas within Minidoka National Historic Site from which structures 1, 4, 7, and 9 (390 ft tall) would be visible.

While the concerns that define the ACEC extend across the entire area, parcels of private land are excluded from the proposed ACEC. Any previous existing access to lands excluded from the proposed ACEC should be preserved, as this does not disrupt the special management needs of the ACEC (see Section 6).

5. Proposed ACEC Relevance and Importance

The cultural and natural resources within the boundary of the proposed Minidoka ACEC are vital and vulnerable to Minidoka survivors and descendants, the Japanese American community, and of national historical importance. In what follows, we summarize the unique nature of these imperiled resources (see Appendix A for nomination summary).

5.1 The proposed Greater Minidoka ACEC has features that are relevant and significant

Within the proposed boundary of the Minidoka Area of Critical Environmental Concern are imperiled significant cultural and natural resources.

Minidoka National Historic Site, managed by the U.S. National Park Service, marks a portion of a concentration camp used to detain people of Japanese descent during World War II. This Historic Site and the concentration camp it represents are nationally significant and vital to Minidoka survivors and descendants, who regularly visit and help maintain the site. The U.S. government should not have created Minidoka and other such concentration camps. Their creation reflects a period when rampant fear and racism drove public policy. This site is vital to all Americans seeking to learn from the nation's historical mistakes. As President Joe Biden said on the Day of Remembrance in 2022:

Today, the National Park Service helps preserve several Japanese American incarceration camps. These tangible reminders of our history provide important spaces for reflection and learning about the injustices born of prejudice. Preserving incarceration sites as national parks and historic landmarks is proof of our Nation's commitment to facing the wrongs of our past, to healing the pain still felt by survivors and their descendants, and to ensuring that we always remember why it matters that we never stop fighting for equality and justice for all. My Administration is committed to maintaining these national parks and landmarks for future generations and to combating xenophobia, hate, and intolerance... In the words of Dr. Frank Kitamoto, who was incarcerated [at Minidoka] as a child, "This is not just a Japanese American story but an American story with implications for the world."³⁹

5.1.a Viewshed

Beyond the physical site, Minidoka's viewshed is also significant and relevant because War Relocation Authority (WRA) sites were specifically chosen for their isolation.⁴⁰ Minidoka was no exception, and oral histories, writings, and other accounts⁴¹ from those who lived at the camp emphasize the site's isolation and remoteness. The surrounding landscape's importance was also recognized in the National Park Service's General Management Plan for Minidoka, which emphasizes the importance of its "immersive setting" and "historical views."⁴²

³⁹ The White House, "Day of Remembrance of Japanese American Incarceration During World War II."

⁴⁰ War Relocation Authority. "Relocation Communities for Wartime Evacuees"; September 1942. James Y. Sakamoto Collection, Box 10, Folder 38.

<https://digitalcollections.lib.washington.edu/digital/collection/pioneerlife/id/16135/rec/1>

⁴¹ Battaglia et al. 16-21

⁴² National Park Service. "Minidoka National Historic Site: History & Culture."

<https://www.nps.gov/miin/learn/historyculture/index.htm>. 2022.

5.1.b Cultural Sites

Within the boundary of the ACEC are additional important cultural sites. These unique sites were created by early Indigenous inhabitants of the Snake River Plain (such as Wilson Butte Cave). These sites include cold storage caves used throughout history and a landscape that ancient (Clovis period) hunters used.⁴³ Several essential sites are still being visited by Indigenous groups today, such as the Shoshone Bannock tribe.

5.1.c Threatened, Endangered, and Special Status Species

In addition to the ancestral sites and places of continued importance to Indigenous peoples, the proposed ACEC contains potential habitats of two federally-listed threatened snail species (Banbury Springs limpet and the Snake River Physa snail), contains potential habitat for the Monarch Butterfly, is within the north-central population of the Greater Sage-grouse, and contains migratory routes and breeding grounds for 18 migratory bird species, including seven special status species (see list above under section 3.4), as well as other species of continued cultural importance to Indigenous people.

5.2 These resources are significant and rare

The cultural and natural resources noted in this proposed ACEC are nationally significant, rare, and vulnerable to impact land uses like the proposed Lava Ridge wind project and any similar development.

Minidoka National Historic Site (MNHS) is the site of one of 10 concentration camps created under Executive Order 9066 and is the only one in Idaho.⁴⁴ The site's viewshed is essential to Minidoka survivors and descendants, essential to the site's interpretation for a national and international audience, and unique to this site.⁴⁵ While many of these concentration camps were in remote areas with distinctive landscapes (Manzanar War Relocation Center, for instance), each camp was built to accommodate a different remote setting. If the ACEC is not designated, this view and the surrounding landscape face significant threats from any future development of structures over 100 feet tall on the terrain, including the Lava Ridge project.

The proposed ACEC is home to populations of threatened species (the Banbury Spring limpet, the Snake River Physa Snail, and the Greater Sage-grouse)⁴⁶⁴⁷. Because of their threatened status, these species are rare, and the population is potentially vulnerable to impact from land use

⁴³ Speer et al.

⁴⁴ National Archives. "Executive Order 9066: Resulting in Japanese-American Incarceration (1942)." U.S. National Archives, revised January 24th, 2022. <https://www.archives.gov/milestone-documents/executive-order-9066>.

⁴⁵ <https://www.nps.gov/subjects/scenicviews/inventory-process.htm> & <https://blmwyomingvisual.anl.gov/vr-inventory/blm/>

⁴⁶ USFWS 2022

⁴⁷ Doherty et al.

change within this area. In addition, several cultural sites of immense importance to current Indigenous groups, such as the Shoshone Bannock, are also found within the proposed ACEC, and development may also adversely impact those sites.

6. Need for Special Management

The proposed Minidoka ACEC requires specific management by the BLM to protect its cultural and natural resources. A primary feature of this proposed ACEC is the historic boundary of the Minidoka Relocation Center and the related viewshed that sweeps beyond it. To preserve the inseparable viewshed of the site, we propose that BLM adopt management prescriptions to (1) exclude projects that have a construction height of 100 ft or higher, such as wind energy projects, within the proposed ACEC, (2) prohibit projects that have a large footprint, such as solar projects, within five miles of the exterior boundary of the Minidoka Relocation Center, (3) designate the ACEC as Visual Resource Management (VRM) Class I, (4) provide for contemporary traditional uses of the land including existing public lands grazing and recreational access (i.e. hunting and ATV use in designated areas), (5) provide for tribal treaty rights - off-reservation uses of the Shoshone Bannock Tribes, (6) prohibit mineral entry and other activities (ROWs for digesters and new transmission).

Regarding visual resources, VRM Classes are BLM designations that “describe the different degrees of modification allowed in the basic elements of the landscape.”⁴⁸ BLM should designate this ACEC as VRM Class I. VRM Class I requires “preserving the existing character of the landscape.” Under VRM Class I, “the level of change to the characteristic landscape should be very low and must not attract attention.”⁴⁹ The key to preserving this landscape would also be excluding large, highly visible structures, including energy infrastructure such as wind turbines, from being constructed on this landscape.

The planned Lava Ridge wind project threatens the viewshed (see Figure 4) from Minidoka National Historic Site. Under the VRM IIII current BLM guidance for this area, there is no protection for the viewshed from Minidoka National Historic Site. We seek the prohibition of wind project construction within the ACEC to protect the view from the current National Historic Site, and we seek this protection not only from Lava Ridge but also from any other similar proposed development in the future. Placing wind turbines or other tall structures within the viewshed of the National Historic Site will diminish the sense of isolation and loneliness, a unique attribute of the site.

The construction of a wind farm in this area would also harm previously documented and undocumented archaeological sites and other locations of cultural importance to Indigenous communities. With the uniqueness and rarity of known ancestral cultural sites and sites important

⁴⁸ Ross, Robert. “The Bureau of Land Management and Visual Resource Management—An Overview.” https://www.fs.usda.gov/psw/publications/documents/psw_gtr035/psw_gtr035_15_ross.pdf

⁴⁹ Bureau of Land Management. “Bureau of Land Management Visual Resource Management Classes.” <https://blmwyomingvisual.anl.gov/vr-mgmt/blm/>.

to different Indigenous groups, such as the Shoshone Bannock, any impact on such cultural resources – as well as those currently undocumented - could severely limit our understanding of the past on the landscape within the proposed ACEC.

The ACEC will also include management zone IV for the Greater Sage-grouse. Given that wind farms pose a known threat to birds,⁵⁰ a wind farm in this area could negatively impact this population and other resident and migrating species, many of which are culturally significant to Indigenous communities. The ACEC also includes the potential habitat of two species of federally listed threatened snails (the Banbury Springs limpet and the Snake River Physa snail).

We also note that the area covered by the proposed ACEC has been historically used for limited hunting, grazing (e.g., Star Lake Grazing Allotment), and plant gathering by people currently living in and around the area included in the ACEC. These activities will not have a visual impact on the Minidoka viewshed, nor a likely negative impact on known/potential cultural sites, nor on habitat for threatened species and should be allowed under the management prescriptions of this ACEC.

7. Conclusion

We herewith formally nominate the Greater Minidoka Area of Critical Environmental Concern under Section 103 of the Federal Land Management Policy Act. The cultural and natural resources of the proposed ACEC fit the BLM's ACEC requirements of relevance and importance. Currently proposed and likely future development threatens these resources and requires specific management prescriptions.

⁵⁰ Péron, Guillaume, James E. Hines, James D. Nichols, William L. Kendall, Kimberly A. Peters, and David S. Mizrahi. "Estimation of bird and bat mortality at wind-power farms with superpopulation models." *Journal of Applied Ecology* (2013): 902-911.

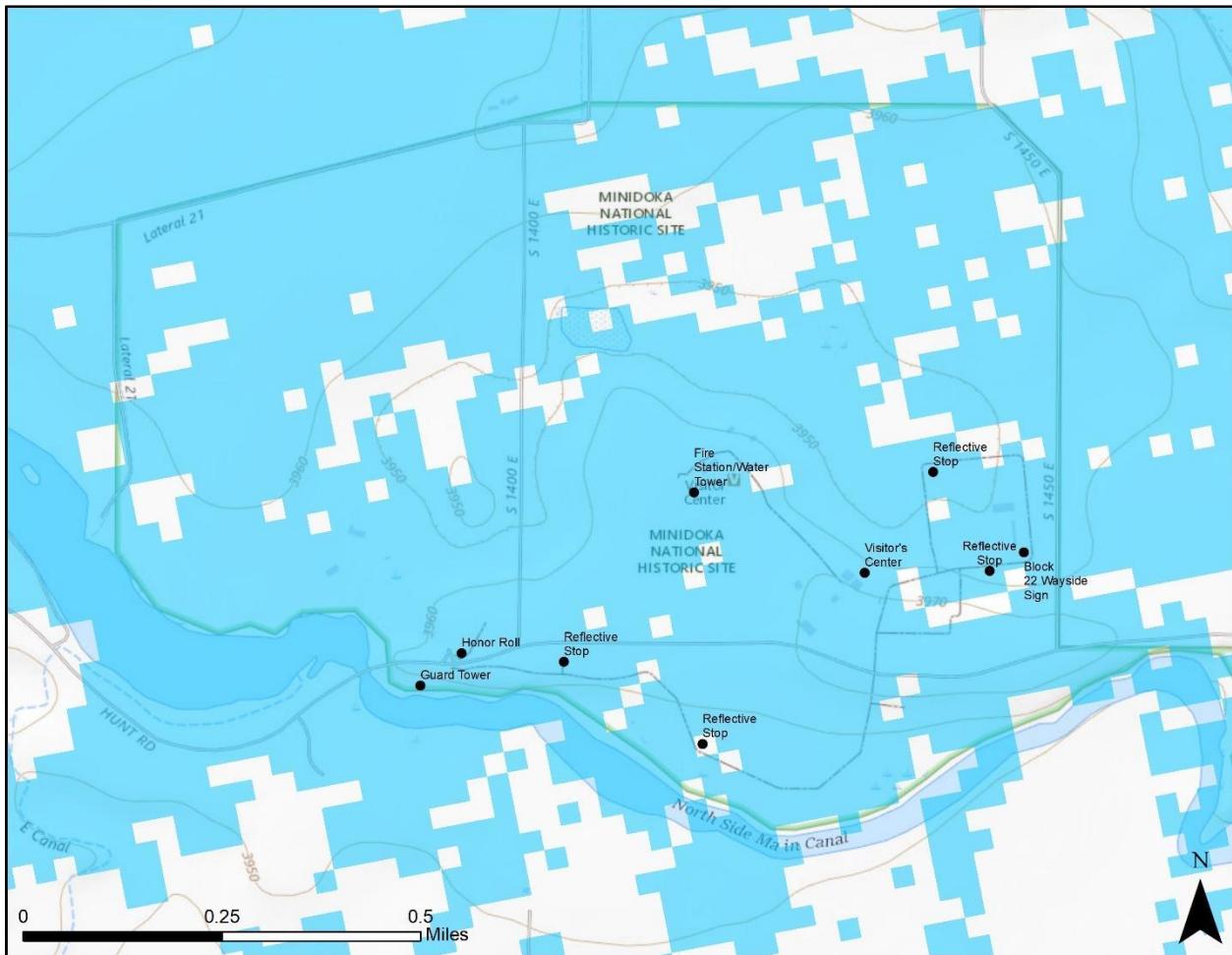
**Appendix A: Greater Minidoka Area of Critical Environmental Concern Nomination
Summary**

Area Considered	Minidoka Area of Critical Environmental Concern	
General Location	<p>The proposed ACEC is located across portions of multiple Public Land Survey System Townships and Ranges: T5S R22E, T9S R17, 18, 19, 20, and 21E, T8S R18, 19, 20, 21, and 22E, T7S R18, 19, 20, 21, and 22E, T6S R22, 21, 20, and 19E, T5S R21 and 22E. This area is on Bureau of Land Management land in northern Jerome County/southern Lincoln County between U.S. 84 and Highway 24 (see Figure 1).</p>	
Total Acreage	237,000 acres	
Values	<p>Cultural Historical Archaeological Wildlife habitat and corridor Scenery/Viewshed</p>	
Relevance		
Relevance Value	Yes/No	Rationale for Determination
A significant historic, cultural, or scenic value (including but not limited to rare or sensitive archeological resources and religious or cultural resources important to Native Americans).	Yes	<p>The proposed ACEC boundary includes the Minidoka National Historic Site, the broader historical boundary of the Minidoka Relocation Center, and the viewshed beyond the historical footprint of Minidoka which marked the outer boundaries of a concentration camp created under Order 9066 from President Franklin D. Roosevelt. The boundary also includes several unique archaeological sites (e.g., Wilson Butte Cave, Tomcat Cave), the potential for future discoveries of significant archaeological sites, and the locations of cultural places of import to Indigenous communities.</p>

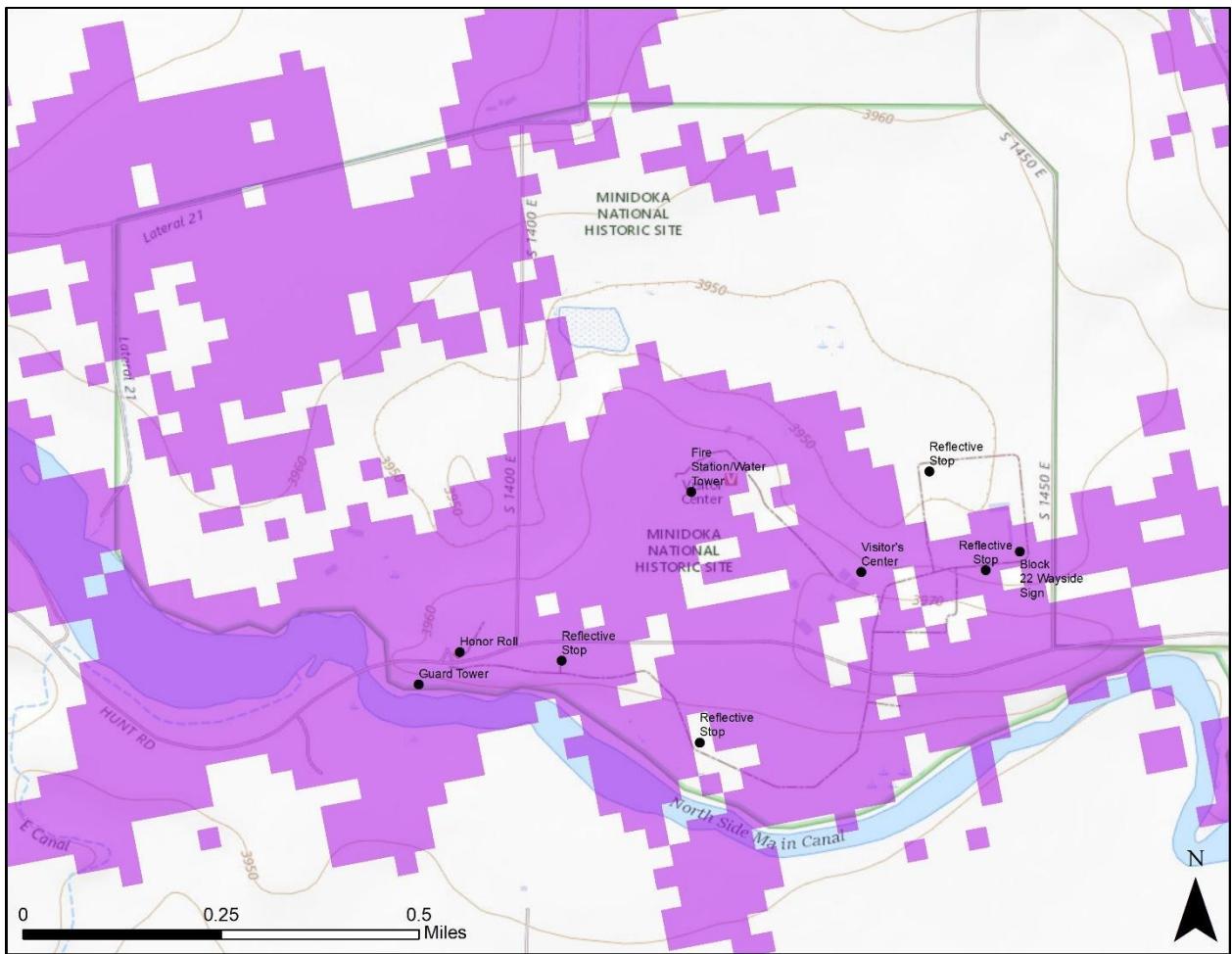
A fish and wildlife resource (including but not limited to habitat for endangered, sensitive or threatened species, or habitat essential for maintaining species diversity).	Yes	The ACEC is in the Snake River Plain, which contains potential habitats for two federally listed threatened snail species (the Banbury Spring limpet and the Snake River Physa snail) and has potential habitat for the Monarch butterfly. It is also home to one of the largest populations of the Greater Sage-grouse, as well as migratory routes and breeding grounds for 18 species of migratory birds and other animals of cultural importance to Indigenous communities.
A natural process or system (including but not limited to endangered, sensitive, or threatened plant species; rare, endemic, or relic plants or plant communities which are terrestrial, aquatic, or riparian; or rare geological features).	No	
Natural hazards (including but not limited to areas of avalanche, dangerous flooding, landslides, unstable soils, seismic activity, or dangerous it is determined through the resource management planning process that it has become part of a natural process	No	
Importance: The value, resource, system, process, or hazard described above must have substantial significance and values in order to satisfy the “importance” criteria. This generally means that the value, resource, system, process, or hazard is characterized by one or more of the following:		
Importance Value	Yes/No	Rationale for Determination
Has more than locally significant qualities which give it special worth, consequence, meaning, distinctiveness, or cause for concern, especially compared to any similar resource.	Yes	Japanese Internment during WWII was a national atrocity which is still highly relevant to the Japanese American community and the history of the U.S. today. Therefore, preserving this area and its viewshed is of national importance.

Has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened, or vulnerable to adverse change.	Yes	Minidoka's remote location was a key reason the site was chosen and an inseparable element of the lived experience of formerly incarcerated people. Preserving the viewshed which projects that feeling of remoteness and isolation is key to preserving Minidoka as a nationally important site.
Has been recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandates of FLPMA.	Yes	The Greater Minidoka Area of Critical Environmental Concern is within the boundary of a Traditional Cultural Property which is thought to be eligible for the National Register of Historic Places
Has qualities which warrant highlighting in order to satisfy public or management concerns about safety and public welfare.	No	
Poses a significant threat to human life and safety or to property	No	

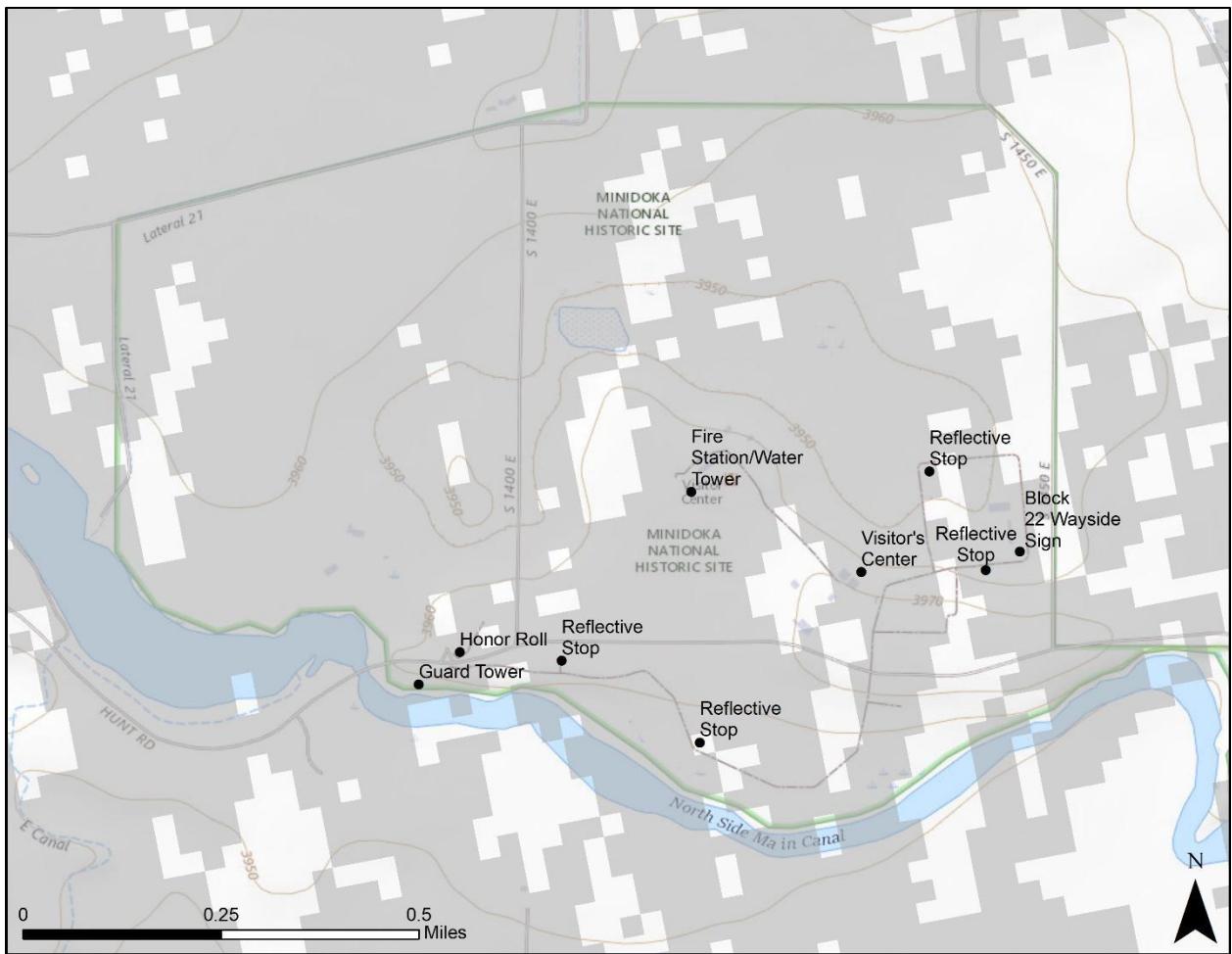
Appendix B – 740 ft structure visibility models



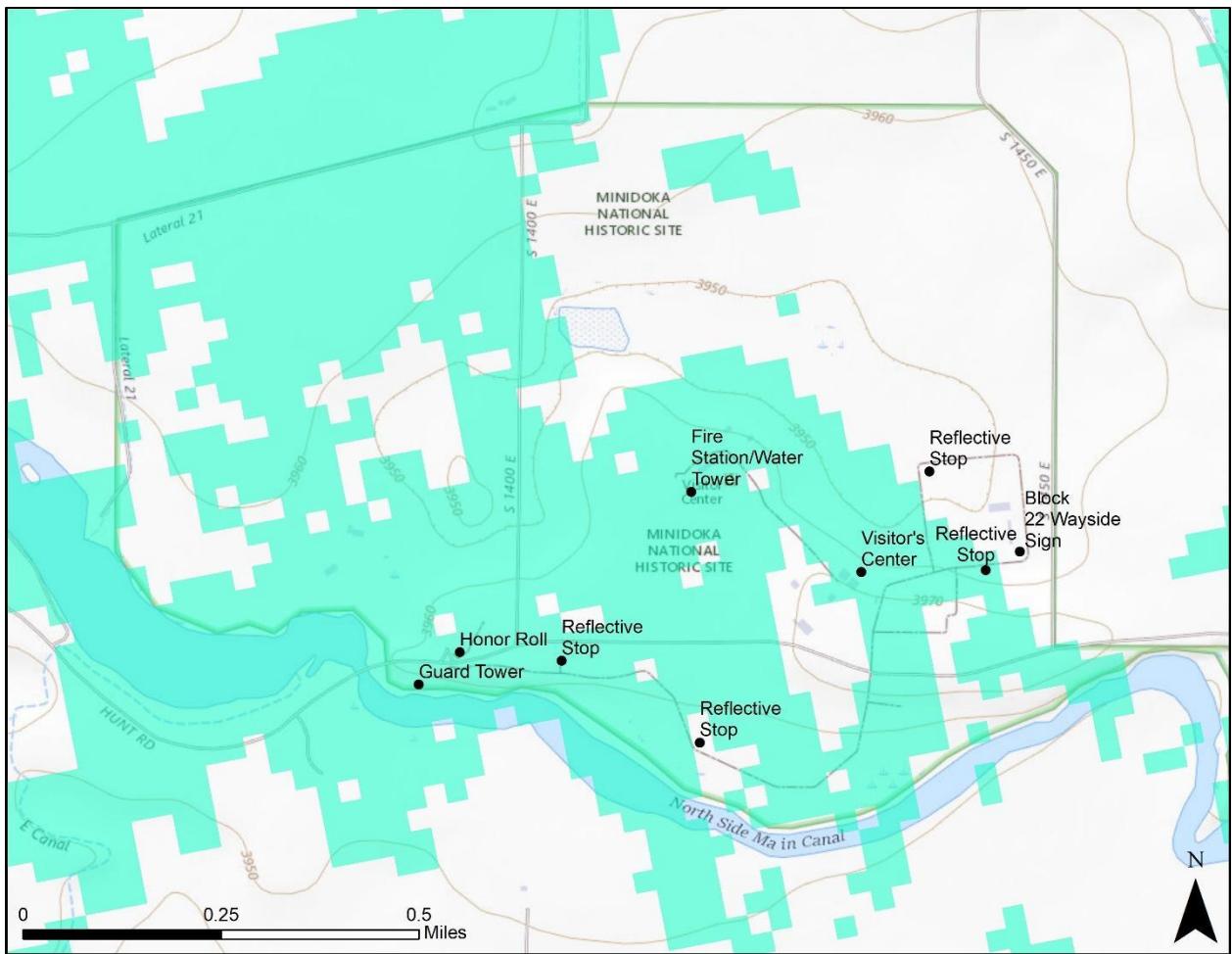
Location 1



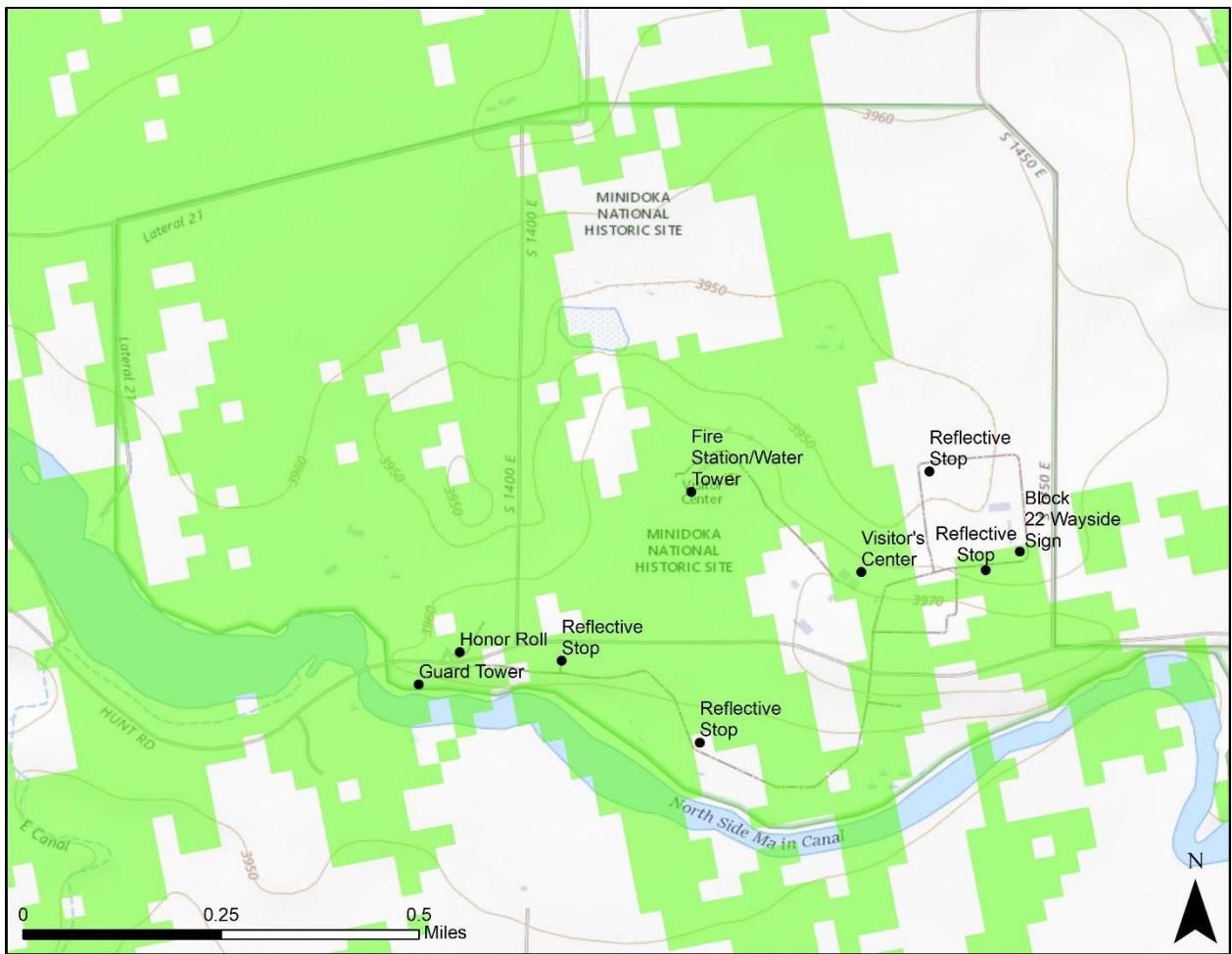
Location 2



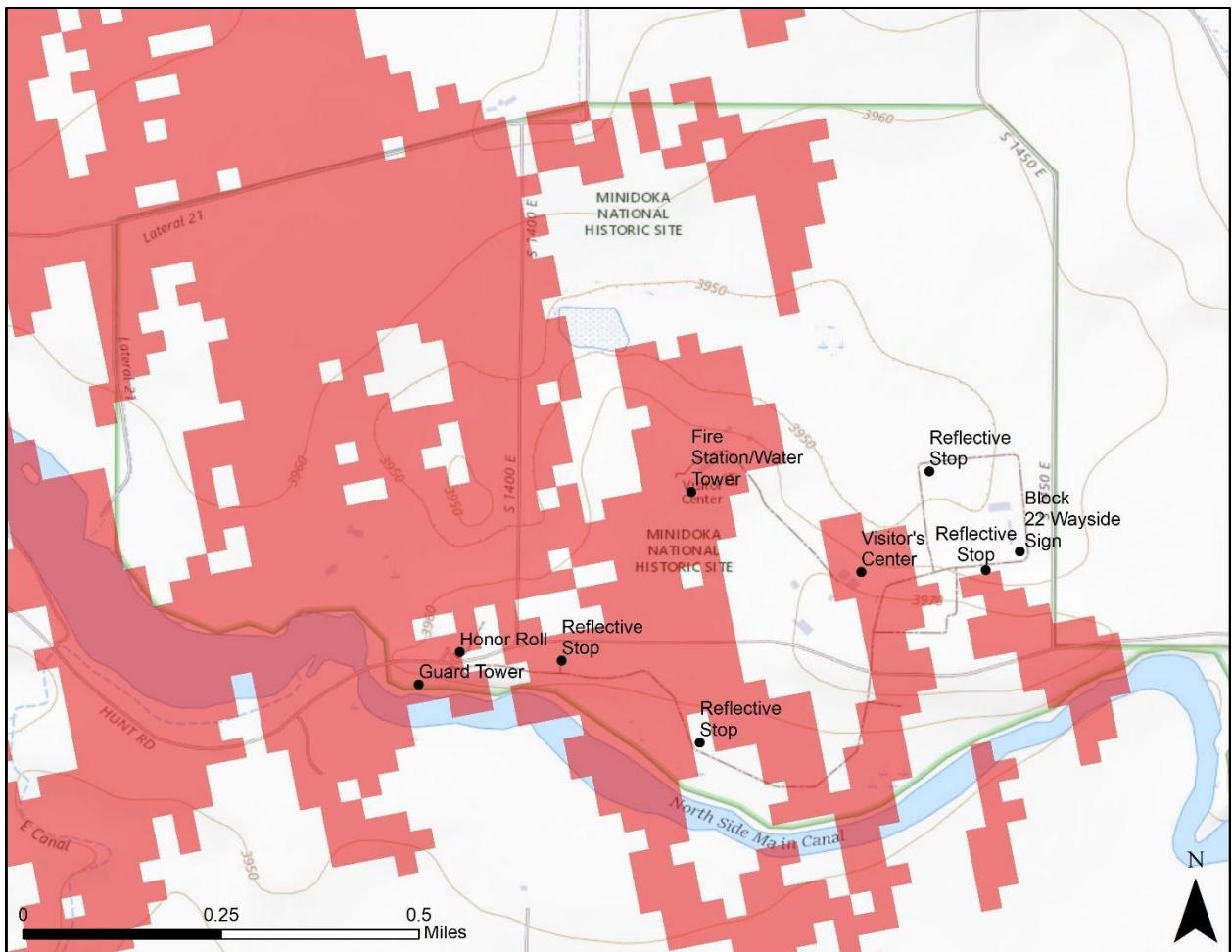
Location 3



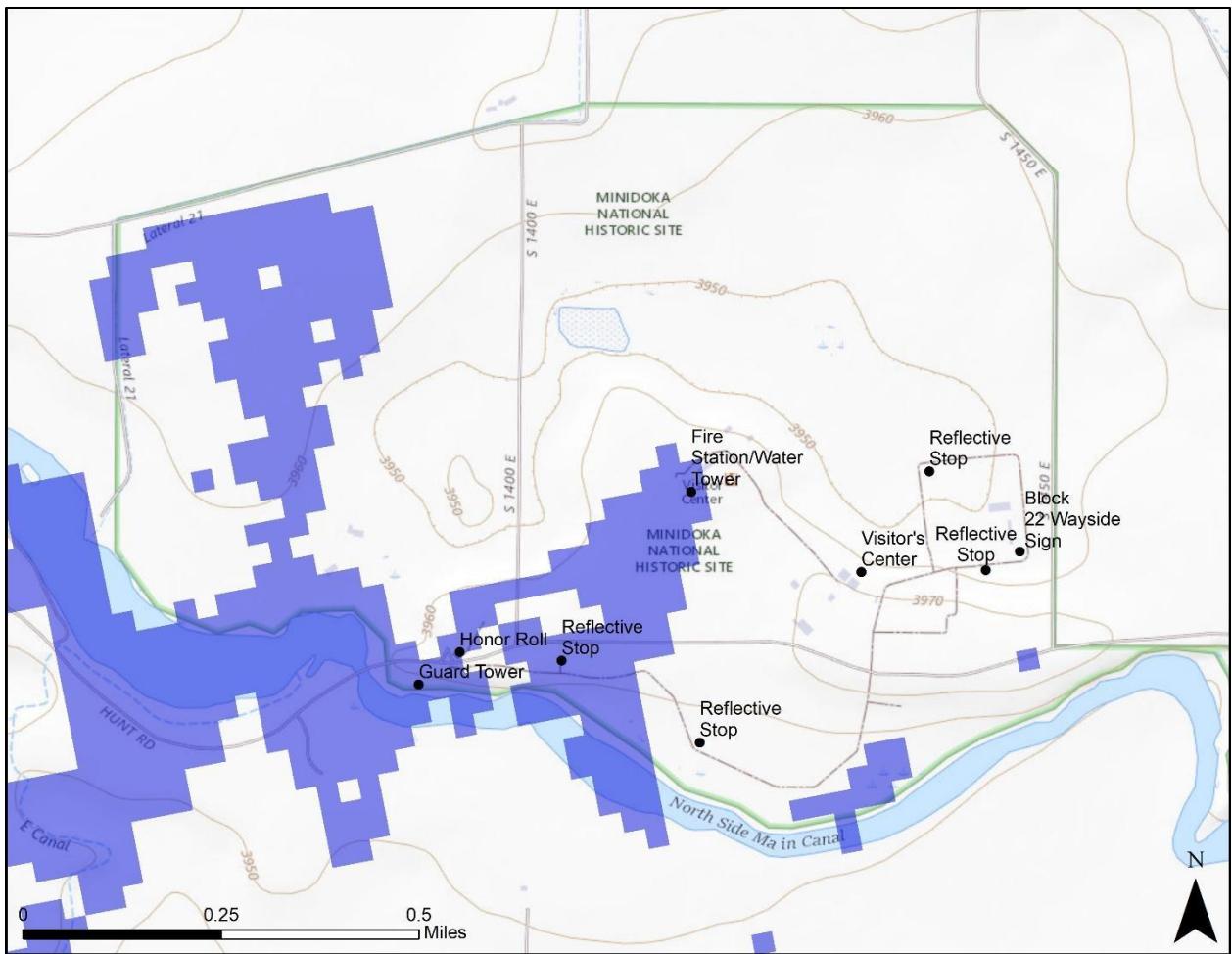
Location 4



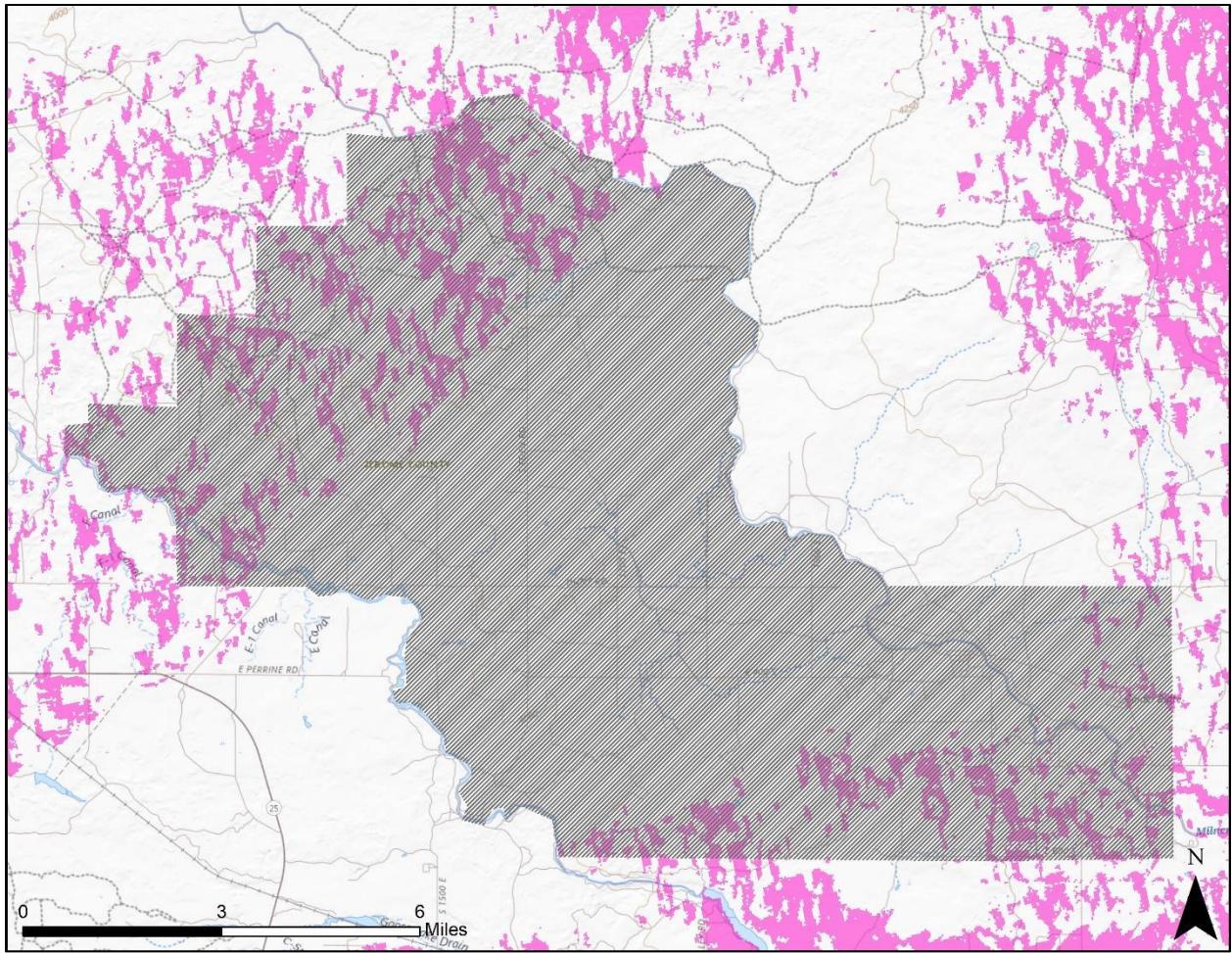
Location 5



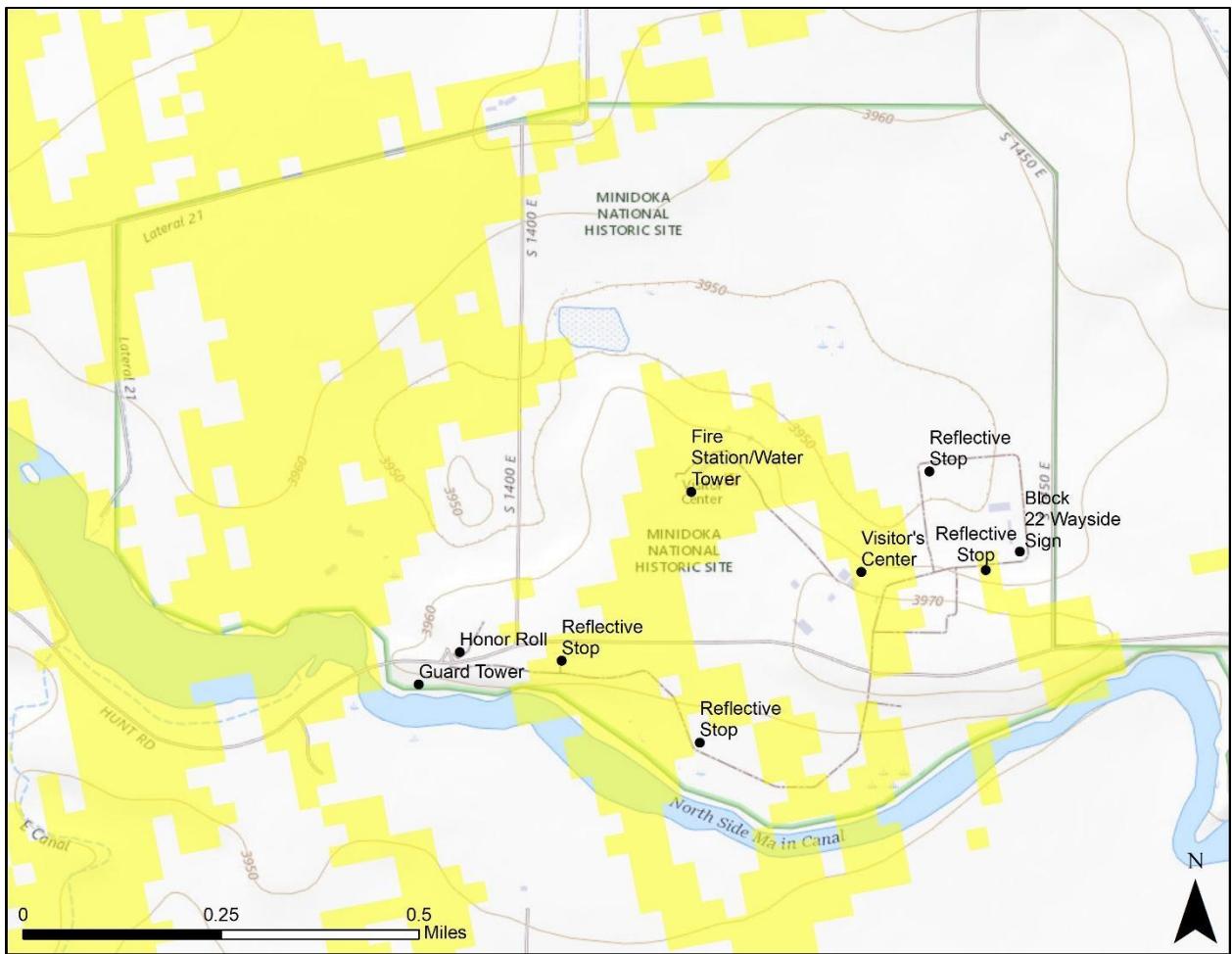
Location 6



Location 7

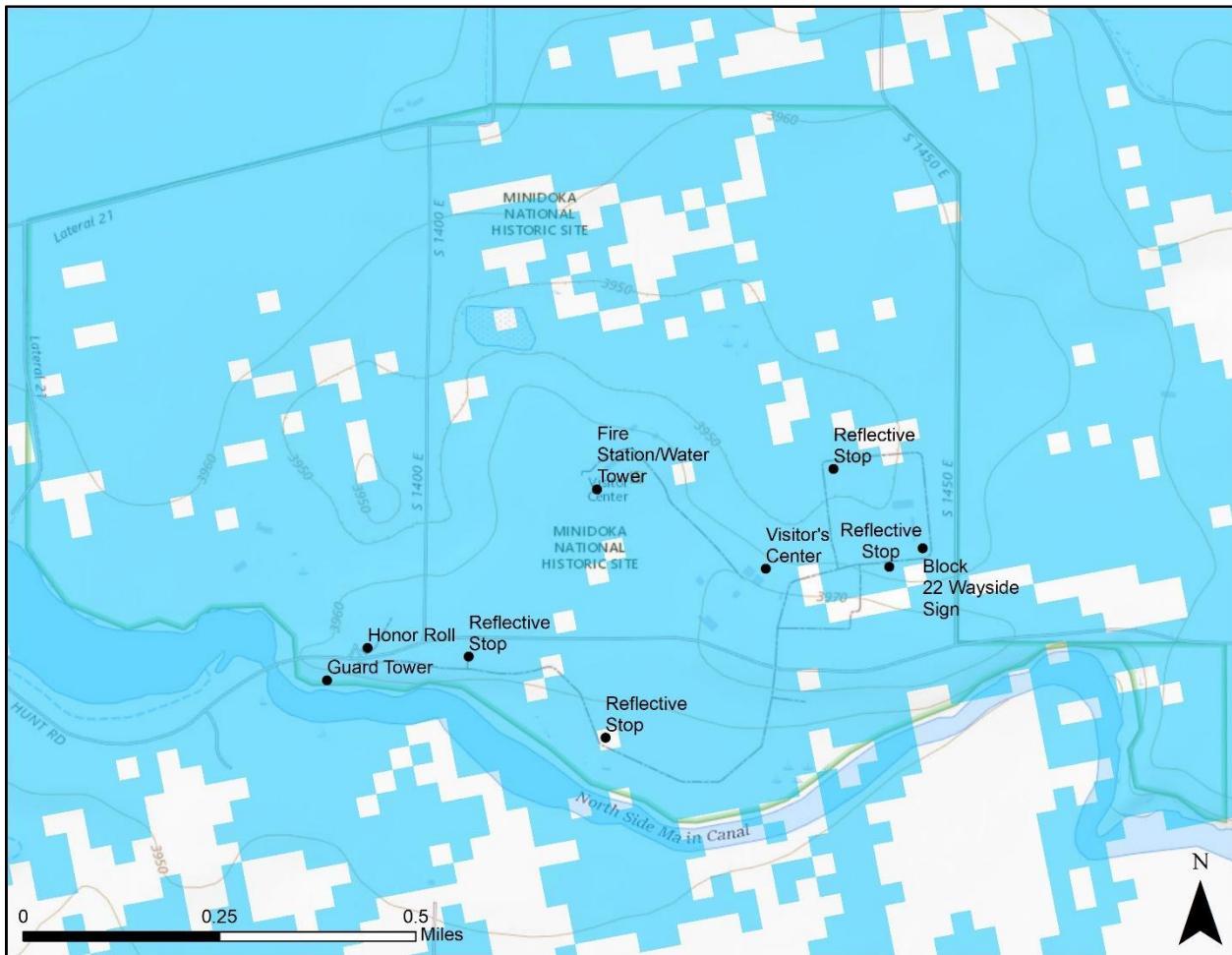


Location 8 – note that this location would not impact views within the historic site, but would impact views across the historical boundary of the Minidoka Relocation Center.

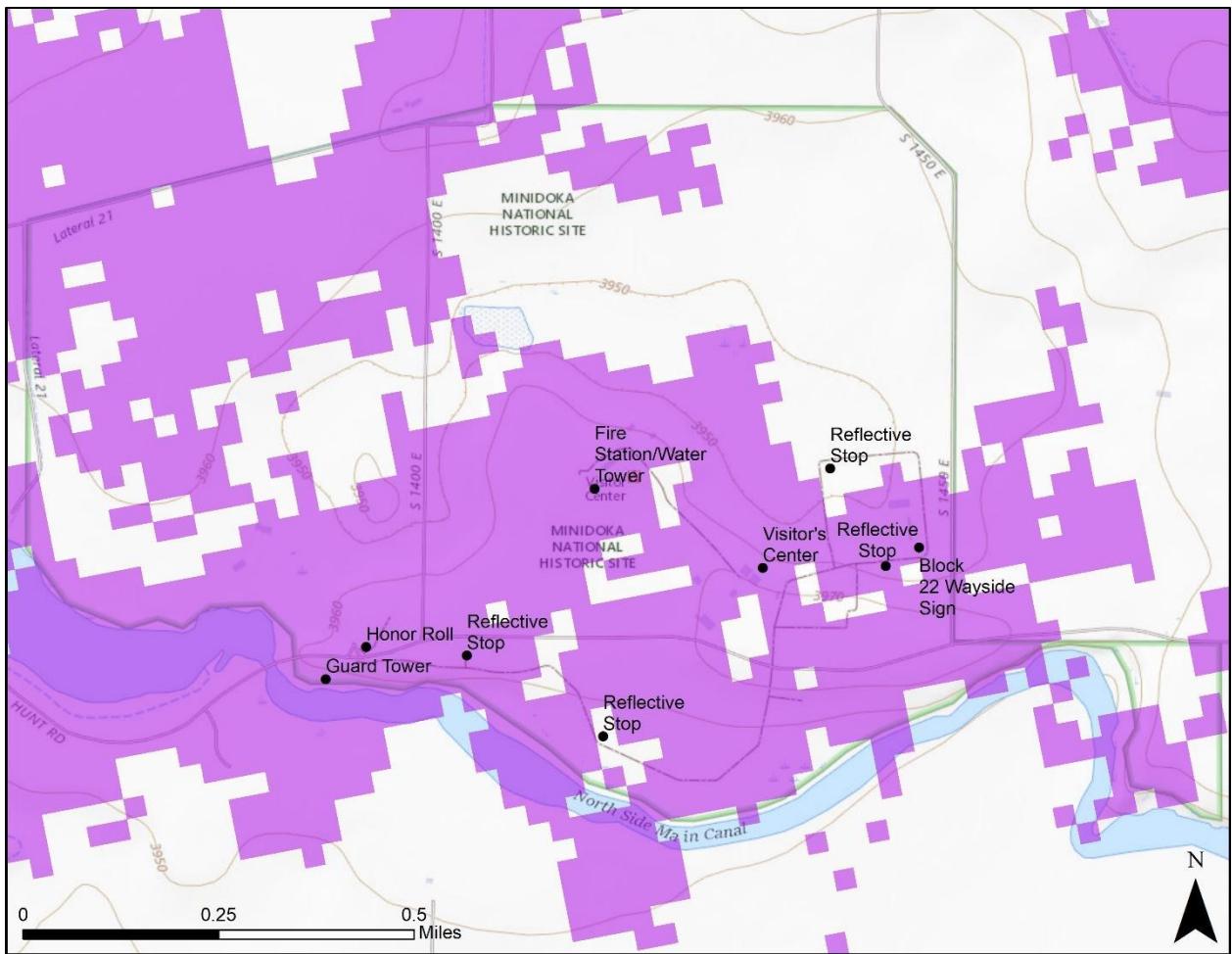


Location 9

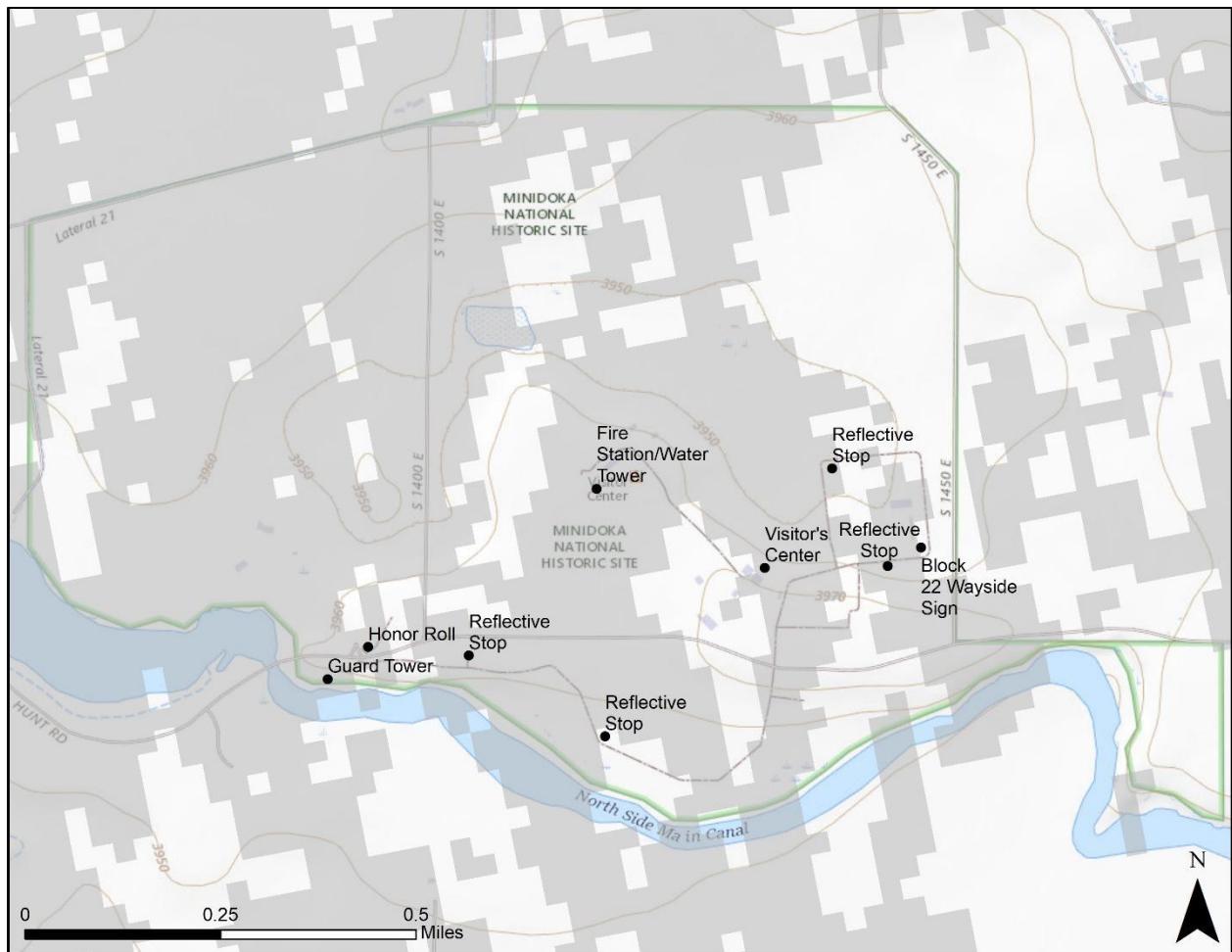
Appendix C – 490 ft structure visibility models



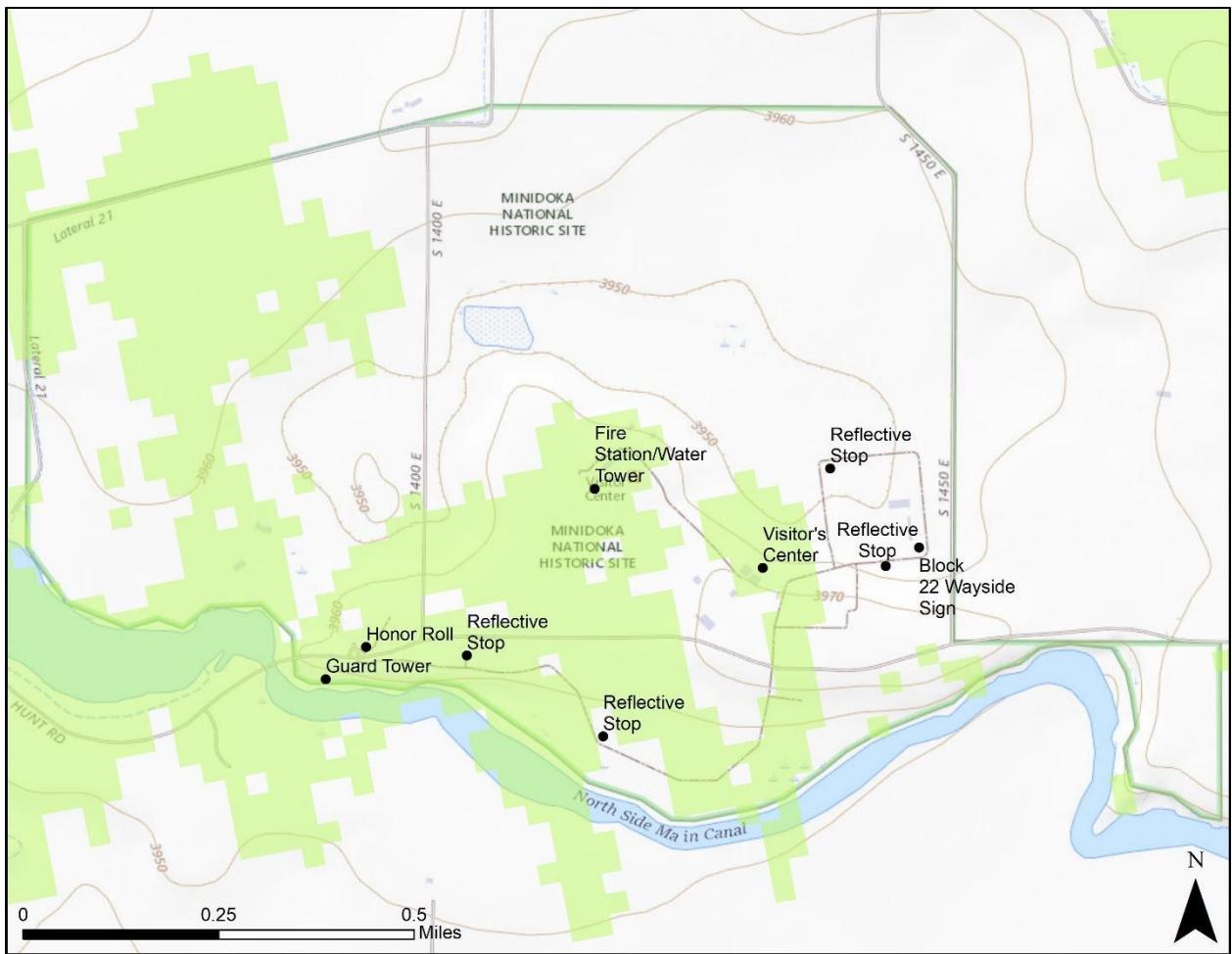
Location 1



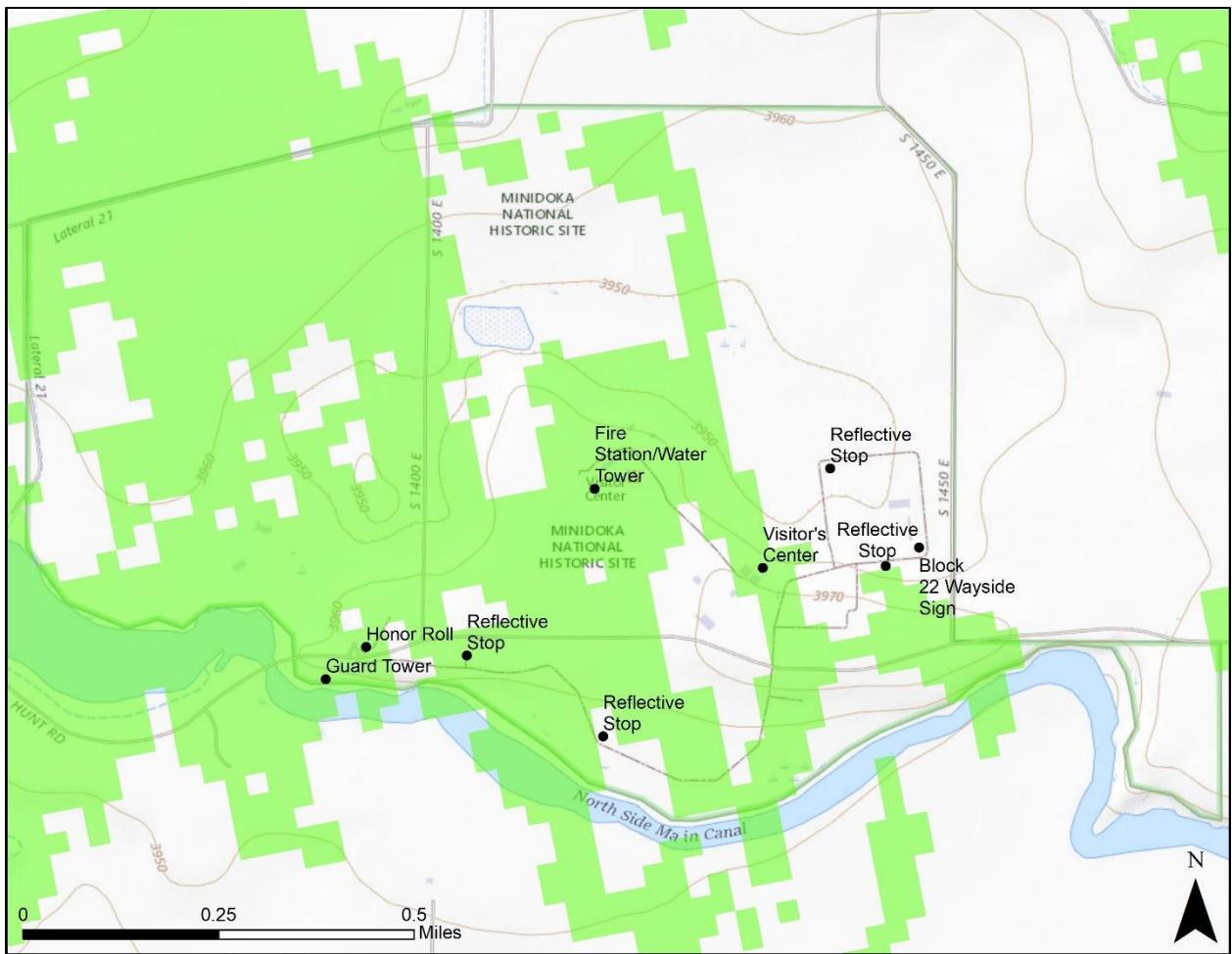
Location 2



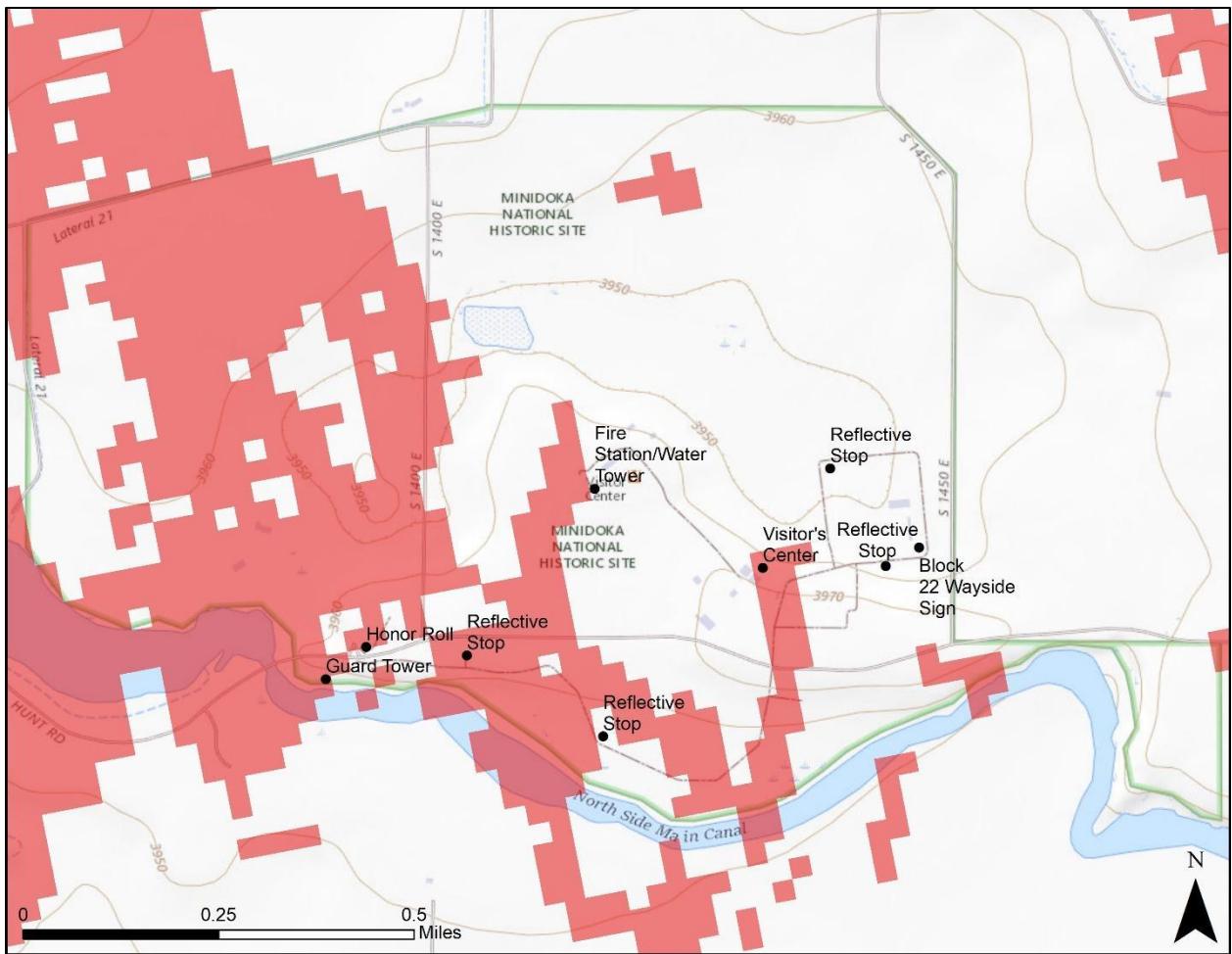
Location 3



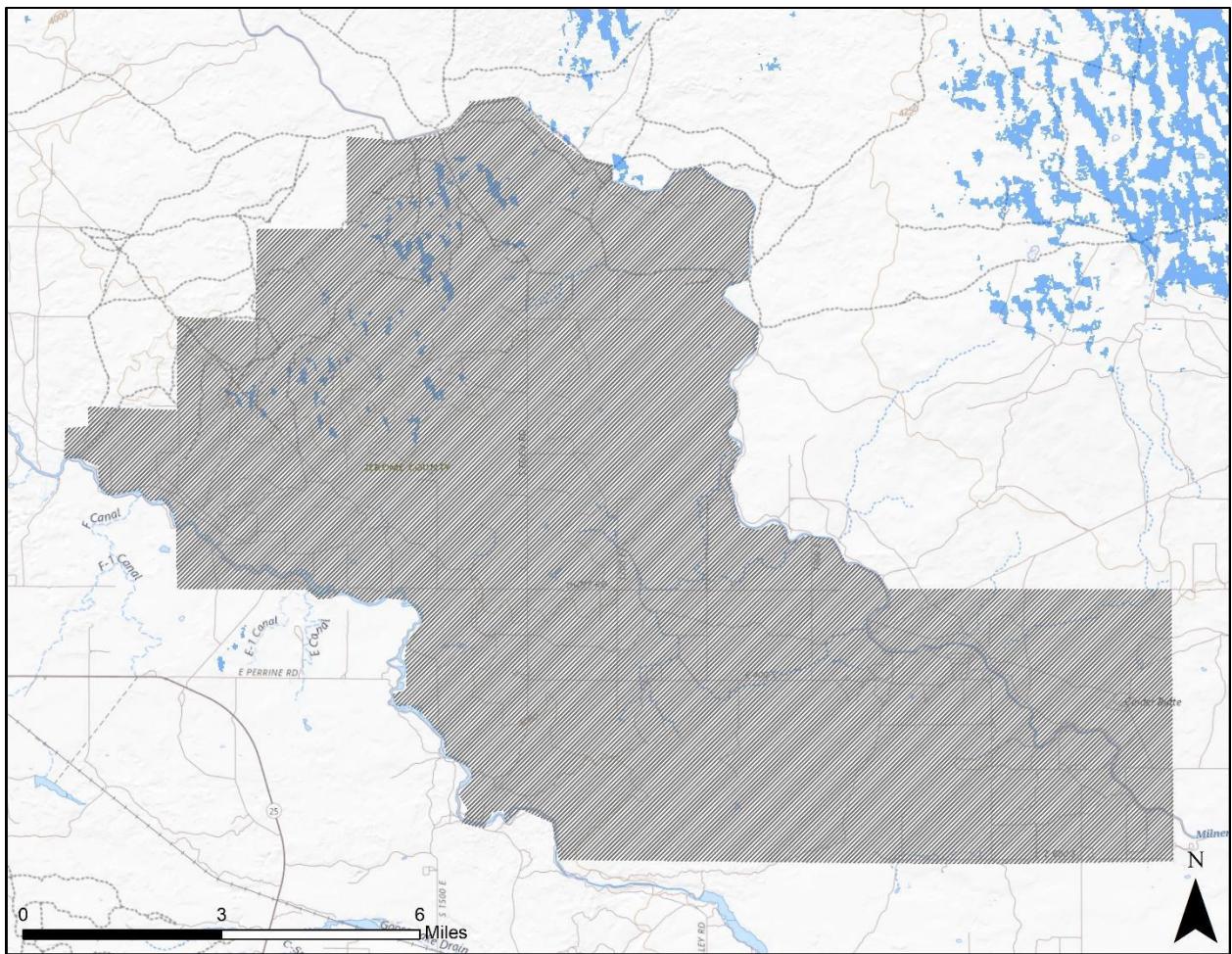
Location 4



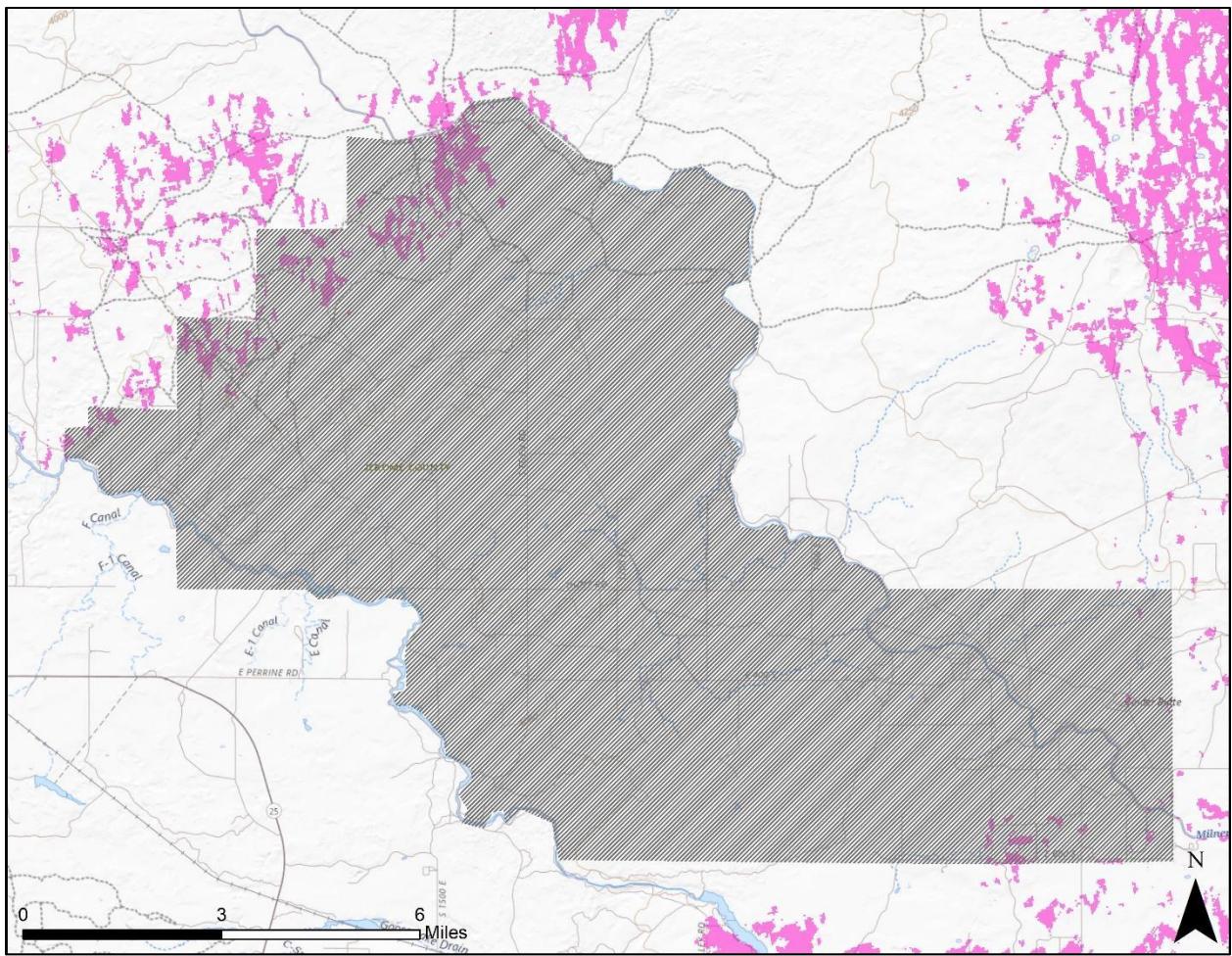
Location 5



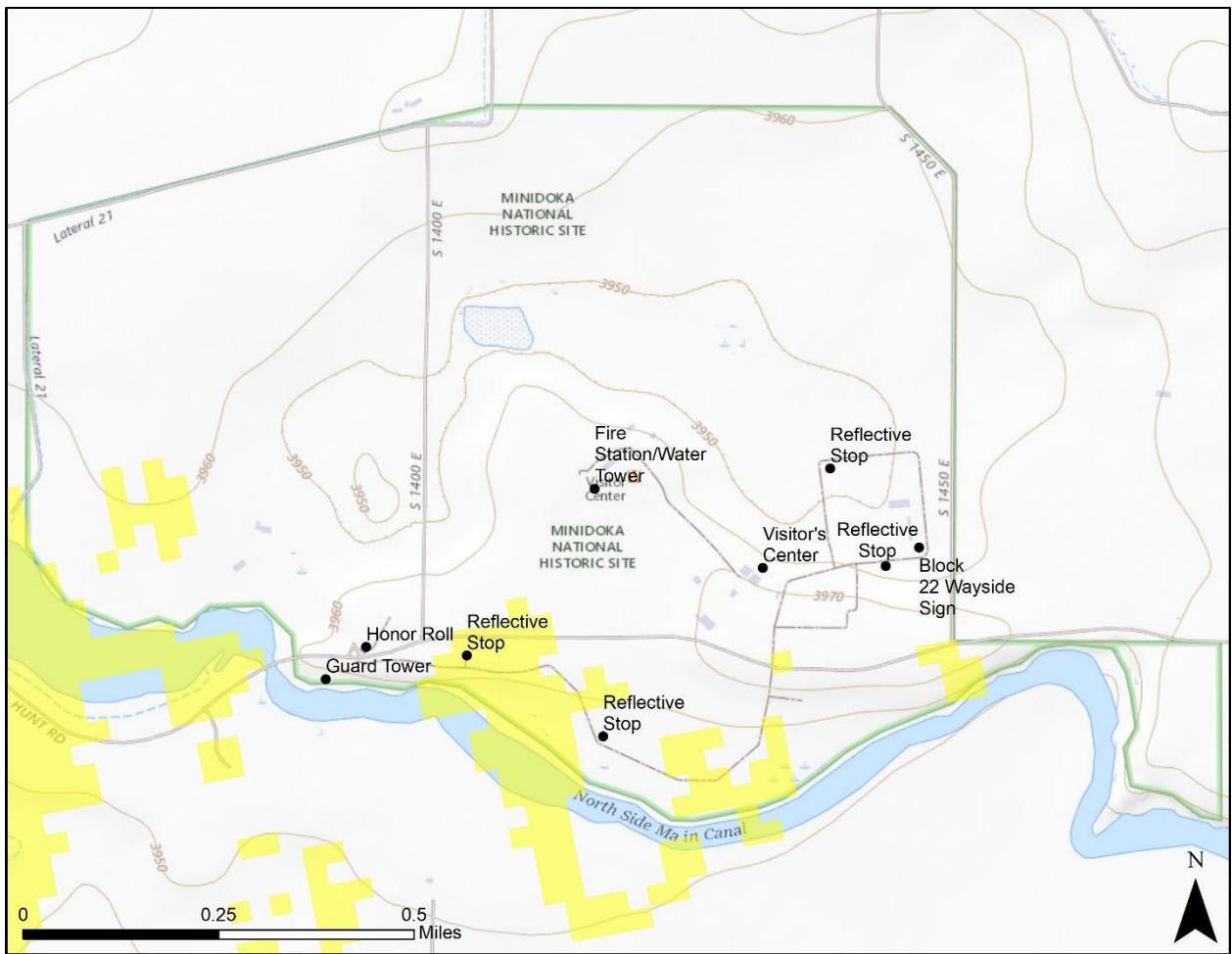
Location 6



Location 7



Location 8



Location 9