

MANZANAR

.....
NATIONAL HISTORIC SITE • CALIFORNIA



GENERAL MANAGEMENT PLAN & ENVIRONMENTAL IMPACT STATEMENT

.....
AUGUST
1996

**General Management Plan
and
Environmental Impact Statement**

**Manzanar National Historic Site
Inyo County, California**

The General Management Plan and Environmental Impact Statement presents a proposal and two alternatives for the management, use, and development of Manzanar National Historic Site (NHS). The proposed plan provides for acquisition of the camp from the current owner and protection of historic and prehistoric resources through a program of resource management and law enforcement. Features include conversion of the historic camp auditorium to an interpretive center and the creation of a network of wayside exhibits throughout the mile-square camp, accessible to visitors by a tour route around the periphery of the camp. A shuttle system would be operated during heavy use periods. Boundary additions, encompassing additional historic resources, are proposed. Reconstruction of a limited number of representative structures would provide additional interpretive features. National Park Service (NPS) support for the annual spring Manzanar Pilgrimage, organized by the Manzanar Committee, would continue.

Alternative A: No Action. would continue the current situation at Manzanar. Lands would not be acquired, resources would not be protected, and no additional steps would be taken to accommodate visitor interest and use. NPS support for the annual Manzanar Pilgrimage would continue.

Alternative B: Minimum Requirements, would be similar to the proposed plan in terms of resource management and protection, but would provide fewer visitor services. There would be no reconstruction and the boundary would not be enlarged from that authorized. There would be no shuttle service.

The environmental consequences of the alternatives are fully documented. No significant adverse impacts are anticipated.

The public availability of this document will continue for 60 days after the publication of a notice of availability by the Environmental Protection Agency in the Federal Register. Any comments must be received by that time and should be addressed to the Superintendent, Manzanar National Historic Site, P.O. Box 426, Independence, Ca. 93526.

Questions regarding the plan and review process should be addressed to the Superintendent at the above address or by telephone at (619) 878-2932.

SUMMARY

This document includes a proposed general management plan and a final environmental impact statement. Two alternatives, including **No Action, Minimum Requirements**, are evaluated as well.

The proposed action would provide staffing and resource management to protect the site's historic and prehistoric features in perpetuity. Features of significance include those associated with the World War II relocation center, centuries of occupation by American Indian cultures, and pioneer ranching and farming activities.

The site would be managed as a cultural landscape based on the World War II relocation center period. Management as such would require rehabilitation of the gridwork of the camp road system, thinning and clearing of some areas of dense tree growth, reconstruction of the camp's perimeter fence, and rehabilitation of some of the rock gardens and ponds constructed by the internees. Historically significant orchards and ornamental plants from both the farming and relocation eras would be retained and managed as landscape features.

Reconstruction of sample barracks and a watchtower would be undertaken to enhance interpretation and visitor understanding of the camp experience.

The plan calls for expanding the current authorized boundary to include approximately 800 acres. Legislation is currently pending. The expanded boundary would encompass additional historic resources associated with the relocation center and with other historic eras at the site.

Visitors would be served by converting the historic auditorium into an interpretive center, providing an initial point of contact to inform the visitor about the site through a series of displays and presentations. Barracks blocks and significant structures throughout the camp would be marked to demonstrate the camp layout to the visitor.

Outlying areas of the camp would be available to visitors through the improvement of historic roadway alignments to accommodate one-way auto traffic. Interior portions of the camp would be accessible only by foot. A shuttle system would provide visitor access and interpretive tours during periods of substantial use. All visitor use planning would be done to meet current mandates for handicapped access and multilingual interpretation.

NPS support would be provided for the annual Manzanar pilgrimage, which would continue to occur in the vicinity of the cemetery. The parking and circulation plan for the site would minimize the impacts of this major annual (late April) event on the site's resources.

No significant adverse environmental impacts would be expected as a result of the proposal. Major beneficial impacts would accrue in the area of cultural resource protection and visitor use. Minor adverse impacts would result from the added structures' visual disruption of the scene, and to wildlife through the thinning and clearing of existing vegetation.


The no-action alternative would continue the existing minimal Park Service capability at the site, consisting of one staff person working with the landowner and other groups to promote resource protection and visitor service on a voluntary basis. Cultural resource quality would continue to decline through natural forces of erosion and weathering and through vandalism. Visitors to the site would continue to stop at the site out of curiosity but would not be provided much information on the site and its prehistory and significant national history.

The minimum requirements alternative would be similar to the proposed action in providing resource management and protection, and in steps aimed at restoring the essentials of the cultural landscape. The auditorium would be converted to an interpretive center and a network of wayside exhibits would be provided at outlying areas. This alternative would not include boundary expansion, there would be no shuttle system, and there would be no reconstruction of the barracks and watchtower structures.

As in the case of the proposed action, minor adverse environmental impacts would accrue to visual quality and wildlife and beneficial impacts in the area of cultural resource protection would be significant.

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INTRODUCTION

Manzanar National Historic Site was established by PL 102-248, in March, 1992. The legislation states that the Historic Site is intended to "provide for the protection and interpretation of historical, cultural, and natural resources associated with the relocation of Japanese Americans during World War II....."

The regional map below shows the location of the unit.



Manzanar is intended to preserve and interpret a representative War Relocation Center as an aspect of the nation's Pacific Campaign of World War II. There were 10 such centers established in western states to confine persons of Japanese descent residing on the west coast. These centers were established pursuant to Executive Order

9066, which authorized the Secretary of War to exclude citizens and aliens from certain designated areas as a security measure against sabotage and espionage. Over 120,000 persons were relocated to those centers. All ten centers were assessed by an NPS historian in the mid-1980's, and Manzanar was determined to be the best preserved and have the greatest potential as a national park unit.

The authorized historic site includes the area occupied by the 10,000 internees, the administrative area, the camp cemetery, and certain support facilities such as a hospital, camouflage factory, and experimental plantation. The area of the site is approximately 555 acres.* See Map 2. The historic site occupies only a small portion of the land included in the six thousand acre Manzanar War Relocation Area. The boundary of this area is shown on Map 3. The outlying acreage was used for agricultural activities and water management facilities.

Based on History and Prehistory in the National Park System and the National Historic Landmarks Program, 1987, the site provides a major contribution to National Park System representation in Theme VIII, World War II, Subtheme B, War in the Pacific, 1941-45. Because of the site's long history of occupation and use by Native American peoples, and its history as an early ranching area and agricultural subdivision, the site also makes contributions toward system representation in Theme I, Cultural Developments: Indigenous American Populations, and Theme XXX, American Ways of Life.

The land within the authorized NHS area is owned by the Los Angeles Department of Water and Power (LADWP), which acquired the land in the 1920's for the water rights. Three intact buildings on the site remaining from the center's operation include two small rock sentry posts located at the historic entrance near Highway 395, and a large wood-frame auditorium. The auditorium was, until January 1996, used by the county as a vehicle maintenance facility. In addition to the standing buildings, there are many foundations, the remaining gridwork of the center's road system, numerous landscape plantings, and the remains of many of the rock gardens built by the internees.

The legislative history indicates that, in addition to the internment era, the Site would also interpret earlier historic eras, including Native American use, and pioneer ranching and farming in the area, including the early twentieth century agricultural village of Manzanar.

* The legislation's reference to 500 acres was based on a rough, pre-survey estimate of the area contained in the proposed boundary map referenced in the legislation. Accurate surveys by LADWP have shown the authorized area to be 555 acres. Pending legislation would increase the boundary to encompass approximately 800 acres.

Map 2

Manzanar National Historic Site
General Management Plan
Existing Conditions



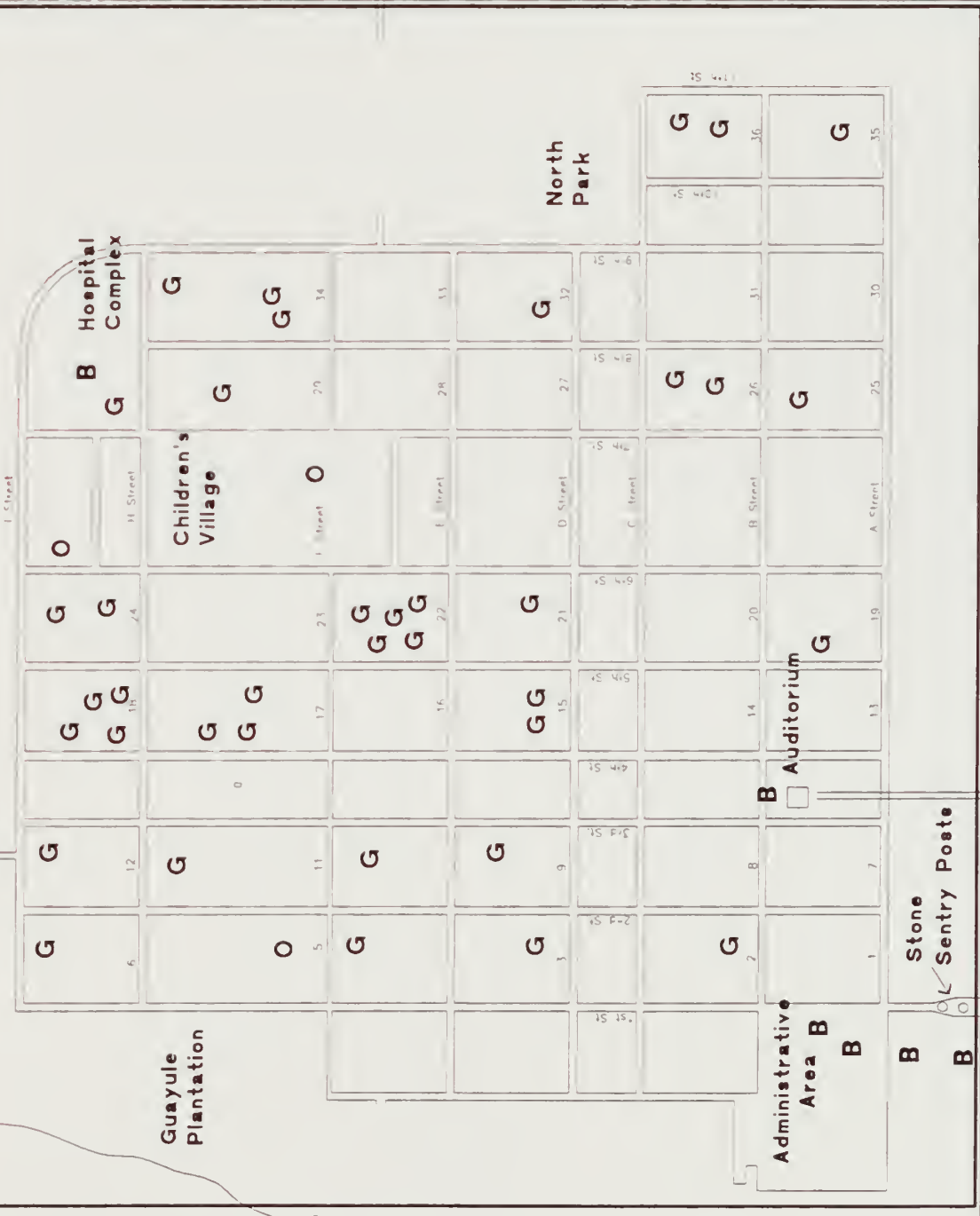
- Physical Remains
- Gardens
- Buildings/Ruins
- Orchards
- Boundary

Cemetery
B

0 100
SCALE IN FEET

Chicken
Ranch
B

Guayule
Plantation



Military
Police
Area

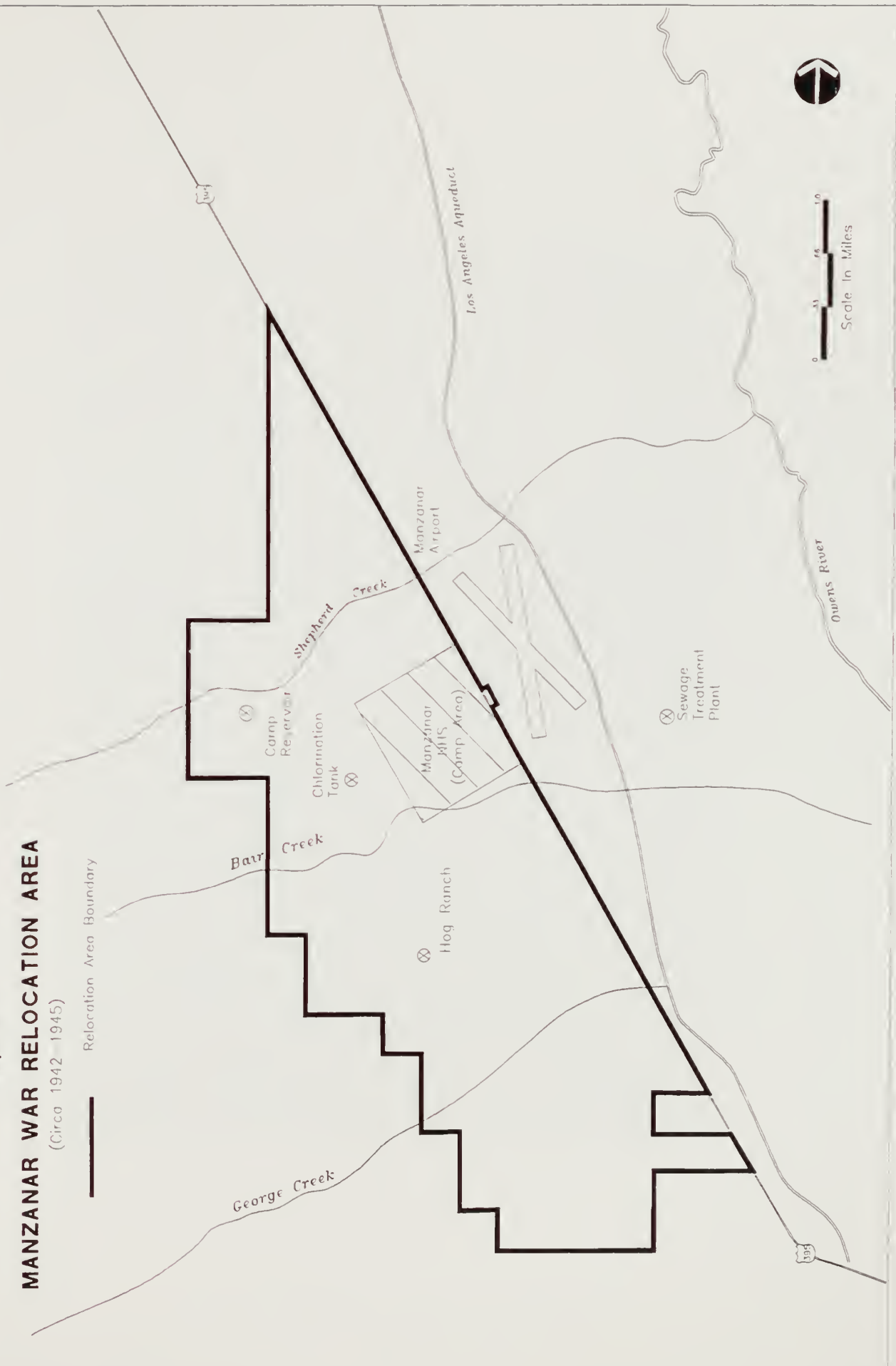
Highway 195

Special provisions of the legislation include:

1. Lands owned by the state or a political subdivision may be acquired only by donation or exchange.
2. Lands may not be acquired until an agreement for water supply has been consummated with the City of Los Angeles.
3. Movement of livestock across contiguous Bureau of Land Management (BLM) land is authorized in lieu of such movement across the historic site.
4. Contribution of up to \$1.1 million for the relocation of Inyo County's maintenance facility from the camp gymnasium to a new facility is authorized.
5. Creation of an 11-member advisory commission for the site is authorized, to consist of internees, local residents, Native Americans, and the general public.
6. Cooperative agreements with public and private entities for management and interpretation at the site are authorized.
7. Cooperative agreements with the state or political subdivisions for rescue, fire fighting, and law enforcement services on a reimbursable basis are authorized.

Map 3
MANZANAR WAR RELOCATION AREA
(Circa 1942-1945)

Relocation Area Boundary



PURPOSE & NEED



Photo: Merritt Collection, Eastern California Museum

PURPOSE AND NEED FOR THE PLAN

There is no existing plan for the Manzanar National Historic Site. A general management plan is needed for the site to outline long-term strategies for dealing with resource protection and visitor use. Public Law 95-625 requires that general management plans be completed for each unit of the National Park System, and a general management plan is specifically mandated for Manzanar NHS by the authorizing legislation.

PLANNING ISSUES

The following are the primary issues to be addressed in the general management plan:

Cultural Resource Management

The site is very rich in historic and prehistoric archeological resources, with fabric and artifacts located on virtually every square foot of the site. The site is already visited by thousands of people each year, and the resources are subject to collection, vandalism, and accidental damage from other uses. Priorities for active preservation need to be considered and strategies developed for preservation.

There is the prospect of NPS acquiring, or being offered the chance to acquire, substantial collections of museum objects related to Manzanar. The Eastern California Museum (ECM), located in nearby Independence, already has a substantial collection of Manzanar objects. Other museums have collections as well. Consideration needs to be given to the role of collections in the overall operations at Manzanar NHS and options for cooperative efforts with other organizations in lieu of extensive NPS curation.

The site is a historic landscape, and basic principles for managing the area as a landscape need to be determined.

The role of restoration and reconstruction at the site needs to be considered, considering the availability of information to allow accurate restoration/reconstruction and the need for such features to support the interpretive program. The scoping process revealed significant public interest in reconstruction of barracks and watch towers on the site. NPS policy on reconstruction (or relocation of historic structures) is generally restrictive, requiring a demonstration that reconstruction (or relocation) is essential for public understanding, that sufficient data exist for accurate replication, and that archeological resources on the site would not be adversely affected.

Natural Resource Management

Decisions are needed regarding overall natural resource management goals and actions

for the site particularly addressing surface water management, vegetation, and wildlife.

Interpretation

Appropriate interpretive themes need to be determined and general presentation strategies for those themes need to be formulated.

Visitor Facilities

Visitor contact facilities and areas for interpretive exhibits and displays would be needed. Options for walking trails and vehicle routes with wayside exhibits need to be considered. Restrooms and potable water need to be provided for visitors.

An overall vehicle circulation plan for the site is needed, considering options for use of shuttle systems as an alternative or in addition to private vehicle access. Requirements for handicapped access and multilingual text and signage must be met.

Boundary and Land Protection

The boundary included in the authorizing legislation includes only a portion of the lands included in the War Relocation Area, which encompassed approximately six thousand acres. The legislation authorizes minor changes to the boundary. Opportunities to adjust the boundary to better encompass important resources and enhance site management need to be explored.

Options for land protection need to be explored. Alternatives to be considered include cooperative agreements, leases, less-than-fee acquisition, and fee acquisition.

Cooperative Management and Partnerships

Opportunities may exist for site management efficiencies and economies through cooperative arrangements with other organizations, particularly Inyo County. These opportunities, potentially extending to law enforcement, emergency medical services, fire control, maintenance, and museum object curation, need to be explored and evaluated.

Cooperation with adjacent land managers would also be important at Manzanar. The historic site is bounded by BLM lands, Los Angeles Department of Water and Power (LADWP) lands, and California Department of Transportation (CALTRANS) lands. Historic resources related to Manzanar are located on these lands. In addition, an LADWP grazing lease is currently in effect for the site. There is a need for coordination with these land managers and users to minimize conflicts.

RELATIONSHIP TO OTHER PLANS

BLM has recently completed a Resource Management Plan for lands in the vicinity of Manzanar NHS. The plan recognizes Manzanar as an important historical resource and its provisions support the site's values. BLM planners have assisted in preparation of the general management plan.

The California Department of Transportation (CALTRANS) is engaged in a long-term process of upgrading U.S. 395 from a two-lane road to a four-lane divided highway. The section bypassing Manzanar is scheduled for completion as funds become available. Coordination on the project would ensure that safe and effective access is provided without adverse effects on historic resources or the visitor experience.

ALTERNATIVES



Photo: National Archives

ALTERNATIVES

Alternative plans use different approaches and different levels of staffing and financial resource commitments to achieve the legislated objectives of the unit and to deal with the various issues. These plans incorporate the range of feasible and acceptable proposals and suggestions surfaced during the scoping process. The plans discussed below were developed by an interdisciplinary team of landscape architects, planners, historians, park managers, and interpretive specialists.

Assistance in planning for Manzanar was provided by an eight-member volunteer team of Japanese American landscape architects. The team, consisting of some of the country's foremost landscape architects, was organized under the auspices of the American Society of Landscape Architects (ASLA) and was chaired by Dennis Otsuji. The team participated extensively in scoping and plan formulation activities, and provided followup review on planning documents.

THE PROPOSED GENERAL MANAGEMENT PLAN

The plan would provide long-term protection of resources and the provision of a range of facilities and services to provide a more meaningful and educational experience for visitors.

Map 4 displays the major features of the plan.

CULTURAL RESOURCE MANAGEMENT

As further discussed and outlined below, the site would be managed as a cultural landscape relating to the internment camp era. To achieve this, the existing features remaining from the camp period such as the road system, structural remains, and landscape plantings would be preserved. To the extent that reconstruction occurs on the site, it would be limited to camp-era structures which can be accurately reconstructed based on historic data. No structures from earlier eras would be placed or reconstructed on the site, and any modern structures required would be located and designed to be compatible with the character of the cultural landscape.

Historic Structures- The three intact buildings on the site, the auditorium and rock sentry posts, would be preserved through regular scheduled maintenance after initial historic preservation and eventual restoration work projects are completed. Historic Structure Reports would be prepared to guide these activities.

As discussed further below, the auditorium would be adaptively used as an interpretive center. This in general terms would entail the restoration of the exterior of the structure to its camp era appearance, including replacement of the missing south wing, and the restoration of the interior to the greatest extent practicable. Sensitive and non-destructive adaptive use would be made of the original portions of the interior for visitor service and administrative functions. An adaptive use study of the structure would be completed to plan for the careful integration of preservation, restoration, and adaptation for contemporary uses.

There are a number of other intact structures on the site, including stone barbecues, stone planters, rock garden structures, etc., and many structural remnants such as walls, steps, etc.. A number of these structures and structural remnants, especially those located at interpretive sites throughout the camp area, would be preserved through regular maintenance. Other structural remnants would be protected from theft and vandalism but would not be actively maintained.

A listing of structures entered on the List of Classified Structures along with the recommended level of treatment is included in the appendix.

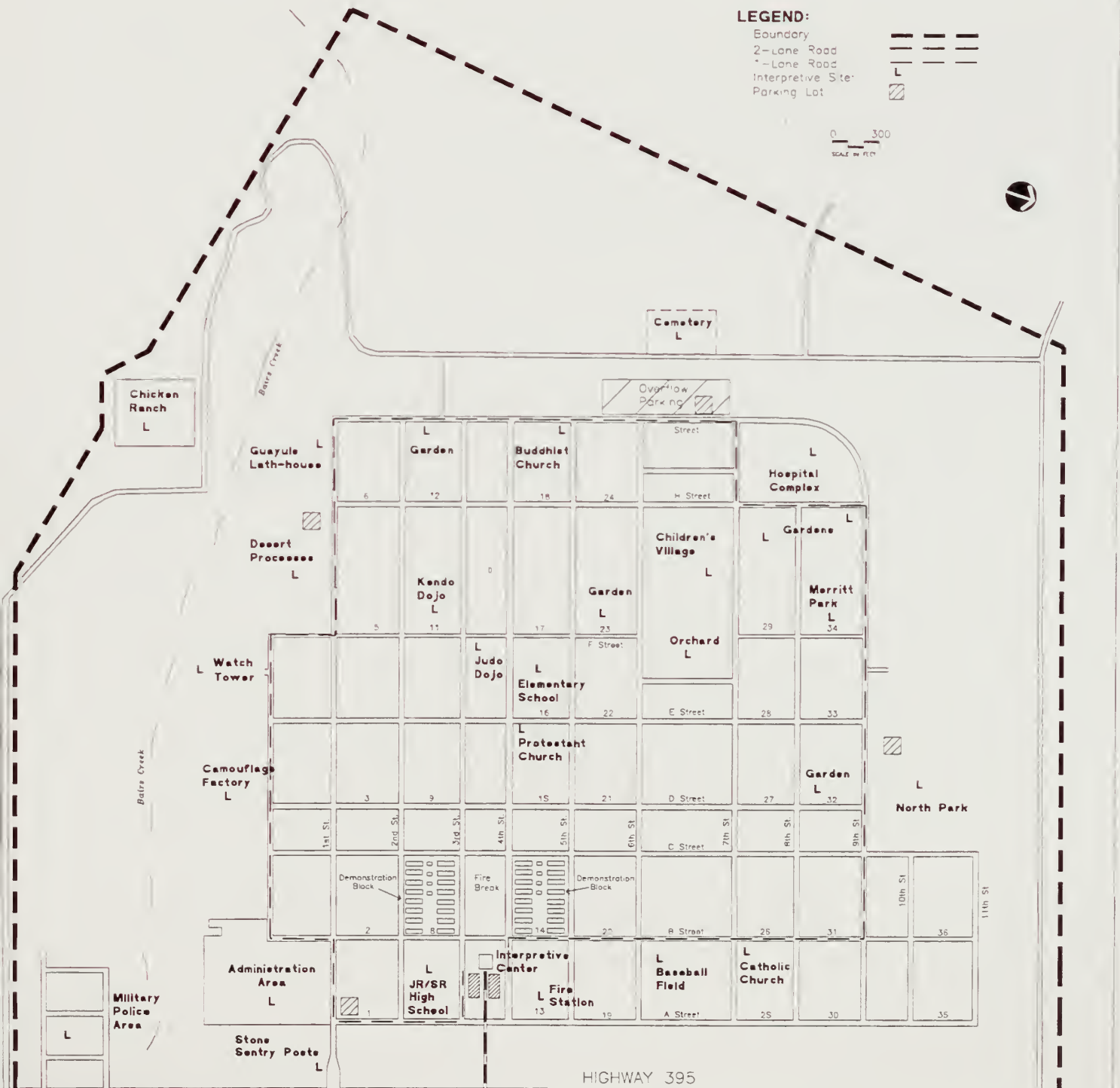
Map 4

MANZANAR NATIONAL HISTORIC SITE GENERAL MANAGEMENT PLAN

LEGEND:

- Boundary
- 2-Lane Road
- *-Lane Road
- Interpretive Site
- Parking Lot

0 300
SCALE IN FEET



One or more barracks would be placed in a demonstration block as further discussed below under interpretation. The barracks would either be original structures relocated to the site, or reconstructions based on the original construction drawings. Support structures such as a latrine, mess hall, and laundry building might also be added.

A single watchtower would be reconstructed based on original construction drawings (or other data as available), and placed at the historic location for such a structure at the midpoint of the camp's south boundary, or at another historic watchtower site on the camp perimeter easily seen by visitors.

Landscape Features- Historic plant specimens at interpretive sites and major extant orchards, dating from pre-camp days, would be preserved and perpetuated through cuttings or seed propagation. Irrigation would be provided as needed. The orchards are recognized as major landscape features linking two principal stages in the site's history. One or more rock gardens identified as interpretive sites would be rehabilitated. Selection of gardens for rehabilitation would be based on the availability of accurate historic documentation and the recommendations of a committee to include former Manzanar internees, landscape design professionals, and cultural resource specialists.

The camp area would be fenced in its entirety, employing the fence design used during the camp period.

The camp's road system, still apparent throughout much of the area, would be rehabilitated to the extent required to retain this network as a visual element of the cultural landscape, and to allow for foot and emergency vehicle traffic. Roads, except as noted below, would not be paved and rehabilitation would not extend to making all the roads usable for motor vehicles.

Selective thinning or clearing of plant growth and tree cover would be undertaken for the purpose of revealing the defining road gridwork, and the conspicuous "firebreaks" strategically located in the camp. A low native vegetation cover would be maintained in the firebreak areas to hold the soil and prevent blowing dust.

Existing facilities and structures incompatible with the historic scene, including non-historic outbuildings located near the auditorium and non-historic fences, would be removed. The historic status of the powerline crossing the site from north to south would be researched and, if the line is found to be non-historic, options for relocation, undergrounding, or identification as non-historic would be considered.

A Cultural Landscape Management Plan would be prepared to provide detailed guidance for the preservation and maintenance of the historic scene, including management of representative gardens, orchards, and other vegetation.

Historic Objects- The NPS would provide substantial support to the Eastern California Museum (ECM) in the collection of historic objects related to Manzanar. Legislative authority and appropriated funds would be sought to assist in the development of additional space and facilities at the ECM to house a Manzanar collection. Only a small collection of artifacts would be in NPS ownership to provide for permanent exhibits in the interpretive center. The NPS would accept only limited donation of artifacts, but would instead encourage donations to the Eastern California Museum (ECM). A cooperative agreement between NPS and ECM would provide for the display of Museum-owned artifacts in rotating exhibits in the interpretive center.

A Scope of Collections Statement would be prepared to guide curatorial activities at the site.

NPS would retain ownership of all archeological objects recovered from the site. However, these objects would be retained onsite only if needed for interpretive purposes; otherwise they would be stored in an off-site NPS repository or under agreement with a non-NPS repository.

Ethnography- Groups traditionally associated with the Manzanar site include Japanese Americans and Native Americans, including Shoshone and Paiute people. Both Japanese American and Native American persons participated in scoping activities at the initiation of the planning process, were further consulted during review of the draft general management plan, and will remain active in overseeing the site's operation through Manzanar Advisory Commission membership and other avenues.

Formal Native American consultations have been undertaken, with the completion of a substantial number of completed interviews. An Ethnographic Assessment and Ethnohistory for the site has been completed. No specific information about sacred sites at Manzanar was revealed in the interviews or literature search. The area apparently was a traditional-use area with permanent camps or villages located in the vicinity. An oral history tradition indicates the presence of human burials, and one was found in the fall of 1993 in the course of an archeological survey.

NATURAL RESOURCE MANAGEMENT

The riparian area along Bairs Creek, which flows through the southwest corner of the site, and adjacent desert areas between the creek and the road would be retained as a natural area. These areas offer an opportunity for interpretation of high desert natural resources phenomena and processes related to the desert's reclamation of the camp area. No construction or development would occur in this area.

As discussed above, selective thinning of natural vegetation at other sites within the boundary would be undertaken as needed to reveal the historic landscape. Such clearing would be preceded by biological surveys to ensure that neither sensitive plant

nor animal species would be affected by such work. In general, low native vegetative cover would be retained throughout the camp to minimize blowing dust.

Surface runoff would be managed in accordance with an overall water resource management plan to be prepared for the site in cooperation with LADWP. Runoff through the site in years of above-normal precipitation causes widespread erosion in the camp area and extensive damage to cultural resources. Some grading and diversion both onsite and off may be necessary to correct the past channeling and diversion activities which were aimed at increasing groundwater recharge in the camp area. Additional environmental and cultural resource compliance, evaluating impacts on threatened and endangered species, wetland and riparian habitat, and historic and archeological resources, would be required to complete and implement this plan.

INTERPRETATION

Manzanar National Historic Site was established based on the significance of the area in World War II history, and consequently the main focus of interpretation will be on the relocation center and program. However, the interpretive program would also be aimed at providing visitors with an understanding and appreciation of the broad range of human history at Manzanar over time, including Native American habitation and uses and early Anglo-American settlement and use as well the World War II period. The specific themes to be addressed at the site would be further refined during the Interpretive planning, but would be expected to include the following:

I. War Relocation Center

- The background, scale, and broad outlines of the relocation program, including reference to the other camps and assembly areas.
- Japanese American history prior to World War II.
- The political, constitutional, and legal issues of relocation, and resolution over time, including legal decisions and political actions.
- The relocation experience
 - Personal impacts
 - Social issues
 - Loyalty Issues
 - Day-to-day camp life, including work, recreation, and schools.

- Adaptations to life at Manzanar, barracks improvements, landscaping, etc.
- Significant persons in the camp history of Manzanar, e.g. Toyo Miyataki, Ralph Merritt, Ansel Adams, Sadao Munemori.

II. Native American Habitation and Use

- The role of the site in Native American life
- Disruption and dislocation from Anglo-American settlement
- Owens Valley Native Americans today

III. Early Anglo-American Settlement and Use

- The Homestead Era & the Shepherd Ranch
- The Town of Manzanar
 - The town as a planned farming community
 - Day-to-day life at Manzanar-stores, farms, schools
 - Valley Water Wars and the Demise of the Town

Interpretive Center- The auditorium would be adaptively used as an interpretive center, designed in such a way that the integrity of the building's original configuration and historic fabric would not be compromised. A staffed information desk would provide visitors with answers to questions regarding the site and the relocation program. Books relating to Manzanar and internment would be available. (Information supplied at this center would focus on Manzanar and the other relocation camps. The information function would complement the Eastern California Museum in Independence, and the Interagency Visitor Center in Lone Pine in providing visitor information for the region.)

Exhibits would include photos, documents, artifacts, videos, and interactive media relating to the identified themes. Consideration would be given to restoring some suitable interior spaces in the auditorium to camp era appearance as interpretive niches.

The interpretive center is extremely important to the visitor experience. Except for returning internees, few visitors would be able to grasp the impact of Manzanar

without a good orientation to this historic chapter and the site. To quickly orient visitors to the many complex elements of this story would require a major A/V production to tell the broad story of early Japanese immigration, restrictive immigration policy, Pearl Harbor, the relocation orders, the camp experience, Japanese American military contributions during the war, and finally the aftermath of the camp experience.

With this grounding in the basics of the story, the visitor would be ready to learn about the Manzanar experience from the internees themselves. For maximum appreciation of the internment camp experience, the communication needs to be personal, involving one-on-one communication with shared experience between those who lived in the camps and the park visitors. This can be accomplished by extensive use of oral history and personal photographs. Whenever an image, quote, or voice is used in an exhibit, the person in the image making the quote or speaking would be identified. The experience then becomes not one of a certain group- Japanese Americans- but one of individuals whose names you know and what they experienced and how they felt about the evacuation and internment.

Wayside Exhibits- An interpretive publication, containing a camp map, would explain the overall layout and mechanics of the camp. Wayside exhibits would be provided at points of interest in the camp, accessible by trails or one-way roads. Their overall purpose would be to expand on the themes presented in the visitor center, and make them more vivid and more specific to the Manzanar site itself. These exhibits would be unobtrusive and, where feasible, make use of historic photographs of the particular point of interest on the actual site.

All residential block areas and the location of significant structures would be identified by suitable low profile signage to facilitate location of specific buildings and areas by visitors and staff.

Blocks 8 and 14, located immediately to the west of the auditorium, would be designated as "demonstration" blocks. The corners of all structures in these blocks would be marked, and waysides would explain the design, function, and family-living implications of each of the structures, including barracks, mess halls, latrines, laundry rooms, etc.. One or more barracks would be relocated or reconstructed in this area. The intervening "firebreak", or dead space, would also be interpreted and its function explained. Uses made of the firebreak, e.g. for sports activities, would be interpreted.

The location of each watchtower would be identified with a marker visible to visitors within the camp area.

Cooperative agreements would be negotiated with both BLM and LADWP to provide for wayside exhibits and interpretive tours of the reservoir area and other adjacent historic features.

In order to restore the historic scene at the entrance, and provide for their improved protection, all memorial plaques now placed at the historic camp entrance, including the National Landmark Plaque, the State historical marker, and the Blue Star Memorial Highway marker, would be relocated to the vicinity of the interpretive center. Consultation with the state Office of Historic Preservation would be required prior to the relocation of the state historical marker.

Personal Services- Guided walks of the site by NPS interpreters would be provided as staffing permits. A Volunteer-In-Parks (VIP) program, enlisting former internees and others as available, would be instituted as an important part of the interpretive program. These personal services programs would be directed both toward the general visitor, and also provide special assistance to former internees in locating features such as specific barracks within the camp.

A shuttle system would be instituted to provide interpretive tours of the site on a regular basis. This service could be provided by the NPS and/or contracted depending on cost efficiencies and the level of visitor demand.

Interpretive Prospectus- An interpretive prospectus would be completed to provide more detailed guidance in exhibits and programs.

CIRCULATION AND PARKING

Site Entrance- The primary entrance to the site would be via the existing non-historic road leading from Highway 395 to the auditorium.

An auxiliary entrance, for park staff administrative use and to provide access during the annual pilgrimage, would be established in the vicinity of the camp cemetery. The existing unpaved road adjacent to the west boundary would be gated at the site boundary, and the limited traffic using this road outside the park would be rerouted on existing unpaved roads to the west of the site.

Highway 395 Improvement- CALTRANS plans to improve Highway 395 to a 4-lane divided road as funds become available. While the current plan involves addition of two northbound lanes to the east, and continued use of the existing roadway for southbound traffic, the realignment of the entire 4-lane system further to the east would better serve resource protection, safety, and visitor use objectives at the site. With this arrangement, the existing highway could serve as a frontage road. NPS will explore this concept further with CALTRANS as the highway planning and design process continues.

Internal Circulation- A paved two-lane road would be provided from Highway 395 to the auditorium. All other vehicle roads, as indicated on Map 4, would follow historic routes, and would conform to the historic width of approximately 15'. These one-way

roads would either be paved or would be treated with a dust palliative. Due to the narrowness of the historic roadways, and the limited turning radii, buses, large RV's, vehicles towing trailers, and other oversized vehicles would not be permitted on the one-way road system.

Parking areas would be located in five locations as indicated on Map 4. The primary visitor parking area would be located immediately east of the auditorium. This area would necessarily be large enough to accommodate a variety of vehicles (autos, RV's, buses) for periods of one to two hours. The four parking areas in the camp area are intended to accommodate a smaller number of vehicles for a shorter period of time, and can accordingly be considerably smaller. Final location of these parking areas would be made based on natural and cultural resource protection needs, and the need to limit intrusion on the historic scene. Unpaved pullouts for vehicles at various points along the primary tour route may also be needed for safety and access.

The parking area located at the cemetery area would be designed with an overflow area to accommodate the large number of cars and buses at the annual pilgrimage. Only the main parking area at the auditorium would be paved; other areas would be compacted earth, treated with a dust palliative. Layout, design, and location of the parking areas would recognize the potential need for current overflow parking, as well as the possible need for future permanent expansion.

A shuttle system would be instituted to serve not only interpretive purposes as discussed above, but to provide visitor transportation to the various points of attraction on the site. During heavy use periods, the one-way road system would be closed to private vehicles, and visitors would be required to either use the shuttle or walk to access the camp. The shuttle would roughly circle the outer perimeter of the camp, directly access a number of interpretive sites, and take visitors to within easy walking distance of most of the camp.

VISITOR USE

Park Uses- The primary visitor use at the site would be historic appreciation. Only those visitor amenities essential to an interpretive visit to the site would be provided. No overnight camping facilities would be provided nor would recreational picnicking be encouraged or facilitated. The site is not intended to serve as a highway rest stop or general information facility, and would be open during daylight hours only.

The annual Manzanar pilgrimage, or similar annual event, would continue at Manzanar, and would continue to be conducted in the cemetery vicinity. The park would cooperate with the event organizers in conducting this event.

The park staff, in cooperation with interested individuals and organizations, would also explore the potential for additional annual events or festivals to celebrate and explore

the Native American, pioneer settlement, and Town of Manzanar history at the site. These annual festivals could include special displays, arts and crafts, thematic guided tours, and foods.

Facilities- All visitor facilities would be designed to be accessible to people with physical disabilities.

Public restrooms would be provided in the interpretive center and at the parking lot near the cemetery. The restrooms at the cemetery area would be supplemented by chemical toilets during the annual pilgrimage.

Benches would be provided at strategic locations along the interpretive routes.

Carrying Capacity- No formal studies of either physical or sociological carrying capacity for the Manzanar site have been completed. However, the levels of visitor use anticipated at the site would not result in resource degradation because visitor use pressures will be matched by management activity as needed to provide resource protection. Visitor management strategies for protecting resources would be periodically evaluated for effectiveness, and periodic visitor satisfaction surveys would ensure that the quality of the visitor experience remains high.

STAFFING

Staffing would be generally as follows:

- Park Superintendent
- Clerk-Typist
- Administrative Technician
- Supervisory Park Ranger
 - Park Rangers- PFT- 2
 - Park Rangers-Seasonal-4
- Maintenance Mechanic Supervisor-
 - Maintenance Worker/Motor Vehicle Operator-2
 - Laborers- PFT- 2
 - Laborers- Seasonal- 4

The park would seek to supplement its work force with an active volunteer recruitment program in both interpretive and resource management activities. Cooperative agreements would be negotiated as feasible with Inyo County and other government agencies to supplement staff capability in law enforcement, curation, and maintenance.

Specialized assistance in natural and cultural resource management, environmental compliance, and museum collection management would be provided by Death Valley

National Park, and other park cluster resources as available.

ADMINISTRATIVE FACILITIES

Office space for the park staff would be provided in the reconstructed south wing of the auditorium.

NPS would acquire maintenance services by contract to the extent possible. Most major maintenance projects, e.g. road and utility work, and those requiring skilled labor such as plumbers and electricians, would be contracted.

Provision would be made in the reconstructed south wing of the auditorium for minimal maintenance storage and workspace to support routine onsite maintenance activities. No flammable materials or gasoline powered tools would be stored in this space.

Rental space would be obtained in local communities as needed to provide a modest work space for shop activities, storage for supplies and materials, and storage for park vehicles. A "shop" vehicle, e.g. a van, truck, or trailer, would be acquired if needed and outfitted with tools to perform a wide range of routine maintenance functions throughout the site. This vehicle would be parked at the offsite maintenance facility.

No park housing would be provided on site.

UTILITIES

Water rights to the Manzanar site would be retained by the City of Los Angeles and water for the park would be provided pursuant to an agreement with LADWP.

Water supply for the interpretive center would be provided by groundwater, with sufficient storage capacity developed to meet peak load demands and emergency fire-fighting needs. Water tanks would be located so as to minimize adverse impacts on the scene. Water conservation practices would be followed at the site with use of low flow devices as feasible. Options for water supply for camp area irrigation would be investigated in conjunction with LADWP.

Sewage treatment requirements would continue to be provided by septic tanks and leach fields. The existing system would be expanded as required, and improvements would be designed to meet all applicable state and local requirements. Additional NEPA and cultural resource compliance would be completed for any proposed new ground disturbance.

Commercial electrical and telephone services are available at the site.

BOUNDARY

The boundary would be expanded from the area identified in the legislation to include approximately 800 acres as shown in Map 4. Legislation to authorize this expanded boundary is pending. A sufficient real property interest would be acquired to allow surface management and protection of the site.

This boundary change would be consistent with NPS Criteria for Boundary Adjustments, December 1991. It meets Criterion 1, "Significant resources or opportunities for public enjoyment related to purposes of the park" because it adds features not available elsewhere within the authorized boundary which were a part of the camp operation and which can and would be interpreted for the public. The boundary proposal also satisfies Criterion 4, "The added lands would be feasible to administer considering size, configuration, ownerships, costs, and other factors" because the addition would be managed integrally with the remainder of the unit at little additional cost, ownership is the same, costs would be relatively low, and the configuration would simplify marking and fencing of the boundary. Finally, it meets Criterion 5, "Other alternatives for management and resource protection are not adequate" in that the plan would call for an active NPS involvement in management of the site and investment in resource protection activity and placement of interpretive media.

The park would work cooperatively with LADWP, CALTRANS, and BLM toward continued protection of the historic scene and continued data collection, protection, and interpretation of historic resources on the several thousand acres of adjacent lands that were part of the Manzanar Relocation Area. Attention in this effort would be particularly focused on resources of known interest and significance such as the camp reservoir and water distribution system, hog ranch, and other prehistoric and historic resources in areas adjacent to the boundary.

The effectiveness of these cooperative efforts in protecting important resources would be monitored over time and, if found not to be successful, consideration would be given to further expansion of the authorized boundary either through administrative action or legislation.

PARTNERSHIPS

Partnerships with other government agencies and with private organizations can contribute significantly to providing successful resources protection and quality visitor experiences at Manzanar NHS. Some of the potential partners with whom NPS would seek cooperative relationships include the following:

Eastern California Museum
American Society of Landscape Architects
Manzanar Committee
California Department of Transportation
Los Angeles Department of Water and Power
Independence Fire District
Bureau of Land Management
Inyo National Forest
Inyo County
Eastern Sierra Interagency Visitor Center
Independence Civic Club
Lone Pine Chamber of Commerce
California Department of Forestry
Paiute-Shoshone Cultural Center
Laws Railroad Museum
California Department of Fish and Game
California Highway Patrol
Death Valley Natural History Association
Boy Scouts of America
Owens Valley Interagency Committee on Lands and Wildlife

MANAGEMENT ZONING

Management zoning prescribes the primary management emphasis for given areas and limits the actions that can be taken in that area. All of the lands within the boundary would be zoned as historic with the exception of minor areas for parking, which would be classified as development zone, and the riparian corridor of Bairs Creek, including any adjacent areas which may subsequently be identified as wetlands, which would be placed in the natural zone with emphasis on preservation of natural processes.

COST ESTIMATES

Annual operation and maintenance costs for this alternative would be approximately \$ 850,000. Cost estimates for major plan features are shown in Appendix 4.

ALTERNATIVE A: NO-ACTION

The no-action plan would continue the current very limited range of activities at Manzanar provided by NPS. One full-time staff person is assigned to the site, who is responsible for working with the landowner and various organizations to protect resources and provide a minimal level of visitor information and service at the site. Since the Park Service has no legal authority on the site, law enforcement is limited to that provided by the Inyo County Sheriff and all resource management and visitor service functions are subject to agreement with the landowner.

Vandalism, theft of artifacts, and resource damage due to uncontrolled natural processes would continue, and visitors would be left to their own resources in visiting the site.

This alternative does not achieve the purposes of the legislation, but it does provide a baseline against which other alternatives can be compared.

Map 3 shows the legislatively authorized boundary and extant features.

ALTERNATIVE B: MINIMUM REQUIREMENTS

The Minimum Requirements Alternative is intended to provide for protection of park resources and provide the visitor with opportunities to experience the primary interpretive themes relevant to the unit. The emphasis in this alternative is on low cost development and operations, the protection of those areas specifically identified by the legislation, and very basic visitor services.

Map 5 displays major features of this alternative.

CULTURAL RESOURCE MANAGEMENT

The site would be managed primarily as a cultural landscape relating to the internment camp era.

Historic Structures- The three intact buildings on the site, the auditorium and rock sentry posts, would be preserved through regular scheduled maintenance after initial historic preservation and rehabilitation work projects are completed. Historic Structure Reports would be prepared to guide these activities.

As discussed further below, the auditorium would be adaptively used as an interpretive center. This in general terms would entail the restoration of the exterior of the structure to its camp era appearance, including replacement of the missing south wing, and the restoration of the interior to the greatest extent practicable. Sensitive and non-destructive adaptive use would be made of the original portions of the interior for visitor service and administrative functions. An adaptive use study of the structure would be completed to plan for the careful integration of preservation, restoration, and adaptation for contemporary uses.

There are a number of other intact structures on the site, including stone barbecues, stone planters, rock garden structures, etc., and many structural remnants such as walls, steps, etc.. A number of these structures and structural remnants, especially those located at interpretive sites throughout the camp area, would be preserved through regular maintenance. Other structural remnants would be protected from theft and vandalism but would be allowed to weather and deteriorate.

A complete listing of structures entered on the List of Classified Structures along with the recommended level of treatment is included in the appendix.

There would be no reconstruction of camp structures such as barracks or watch towers.

Landscape Features- Historic plant specimens at interpretive sites and major extant orchards, dating from pre-camp days, would be preserved and perpetuated through

Map 5

MANZANAR NATIONAL HISTORIC SITE
GENERAL MANAGEMENT PLAN
ALTERNATIVE B

0 300
SCALE IN FEET

LEGEND:

- Boundary
- 2-Lane Road
- 1-Lane Road
- Interpretive Site
- Parking Lot



HIGHWAY 395



cuttings or seed propagation. Irrigation would be provided as needed. The orchards are recognized as major landscape features linking two principal stages in the site's history. One or more rock gardens identified as interpretive sites would be rehabilitated. Selection of gardens for rehabilitation would be based on the availability of accurate historic documentation and the recommendations of a committee to include former Manzanar internees, landscape design professionals, and cultural resource specialists.

The camp area would be fenced in its entirety, employing the fence design used during the camp period.

The camp's road system, still apparent throughout much of the area, would be rehabilitated to the extent required to retain this network as a major visual element of the cultural landscape, and to allow for foot and emergency vehicle traffic. Roads, except as noted below, would not be paved and rehabilitation would not extend to making all the roads usable for motor vehicles.

Selective thinning or clearing of plant growth and tree cover would be undertaken for the purpose of revealing the defining road gridwork, and the conspicuous "firebreaks" strategically located in the camp.

Existing facilities and structures incompatible with the historic scene, including non-historic outbuildings located near the auditorium and non-historic fences, would be removed. The historic status of the powerline crossing the site from north to south would be researched and, if the line is found to be non-historic, options for relocation, undergrounding, or identification as non-historic would be considered.

A Cultural Landscape Management Plan would be prepared to provide detailed guidance for the preservation and maintenance of the historic scene, including management of representative gardens, orchards, and other vegetation.

Historic Objects- Collection of historic objects would be minimized as a function of the unit. Only a small collection of artifacts would be in NPS ownership to provide for permanent exhibits in the interpretive center. The NPS would accept only limited donation of artifacts, but would instead encourage donations to the Eastern California Museum (ECM). A cooperative agreement between NPS and ECM would provide for the display of Museum-owned artifacts in rotating exhibits in the interpretive center. A Scope of Collections Statement would be prepared to guide curatorial activities at the site.

NPS would retain ownership of all archeological objects recovered from the site. However, these objects would be retained onsite only if needed for interpretive purposes; otherwise they would be stored in an off-site NPS repository or under agreement with a non-NPS repository.

Ethnography- Groups traditionally associated with the Manzanar site include Japanese Americans and Native Americans, including Shoshone and Paiute people. Both Japanese American and Native American persons participated in scoping activities at the initiation of the planning process, are being further consulted during review of the draft general management plan, and will remain active in overseeing the site's operation through Manzanar Advisory Commission membership and other avenues.

Formal Native American consultations have been undertaken, with the completion of a substantial number of completed interviews. An Ethnographic Assessment and Ethnohistory for the site are nearing completion. No specific information about sacred sites at Manzanar was revealed in the interviews or literature search. The area apparently was a traditional-use area with permanent camps or villages located in the vicinity. An oral history tradition indicates the presence of human burials, and one was found in the fall of 1993 in the course of an archeological survey.

NATURAL RESOURCE MANAGEMENT

The riparian area along Bairs Creek, which flows through the southwest corner of the site, and adjacent desert areas between the creek and the road would be retained as a natural area. These areas present an opportunity for some limited interpretation of high desert natural resources phenomena and processes related to the desert's reclamation of the camp area. No construction or development would occur in this area.

As discussed above, selective thinning of natural vegetation at other sites within the boundary would be undertaken as needed to display the historic landscape. Such clearing would be preceded by biological surveys to ensure that neither sensitive plant nor animal species would be affected by such work. In general, low native vegetative cover would be retained throughout the camp to prevent excessive blowing dust.

Surface runoff would be directed to natural channels in accordance with an overall water resource management plan to be prepared for the site in cooperation with LADWP. Runoff through the site in years of above-normal precipitation causes widespread erosion in the camp area and extensive damage to cultural resources. Some grading and diversion both onsite and off may be necessary to correct the past channeling and diversion activities which were aimed at increasing groundwater recharge in the camp area. Additional environmental and cultural resource compliance would be required to complete and implement this plan.

INTERPRETATION

The interpretive program would be aimed at providing visitors with an understanding and appreciation of the broad range of human history at Manzanar over time, including the War Relocation Center period, Native American habitation and uses, and early Anglo-American settlement and use. The specific themes to be addressed at the site would be further refined during interpretive planning, but would be expected to include the following:

I. War Relocation Center

- The background, scale, and broad outlines of the relocation program, including reference to the other camps and assembly areas.
- Japanese American history prior to World War II.
- The political, constitutional, and legal issues of relocation, and resolution over time, including legal decisions and political actions.
- The relocation experience
 - Personal impacts
 - Social issues
 - Loyalty Issues
 - Day-to-day camp life, including work, recreation, and schools.
 - Adaptations to life at Manzanar, barracks improvements, landscaping, etc.
- Significant persons in the camp history of Manzanar, e.g. Toyo Miyataki, Ralph Merritt, Ansel Adams, Sadao Munemori.

II. Native American Habitation and Use

- The role of the site in Native American life
- Disruption and dislocation from Anglo-American settlement
- Owens Valley Native Americans today

III. Early Anglo-American Settlement and Use

- The Homestead Era & the Shepherd Ranch
- The Town of Manzanar
 - The town as a planned farming community
 - Day-to-day life at Manzanar-stores, farms, schools
 - Valley Water Wars and the Demise of the Town

Interpretive Center- The auditorium would be adaptively used as an interpretive center, designed in such a way that the integrity of the building's original configuration and historic fabric would not be compromised. A staffed information desk would provide visitors with answers to questions regarding the site and the relocation program. Books relating to Manzanar and internment would be available. (Information supplied at this center would focus on Manzanar and the other relocation camps. The information function would complement the Eastern California Museum in Independence, and the Interagency Visitor Center in Lone Pine in providing visitor information for the region.)

Exhibits would include photos, documents, artifacts, videos, and interactive media relating to the identified themes. Consideration would be given to restoring some suitable interior spaces in the auditorium to camp era appearance as interpretive niches.

The interpretive center is extremely important to the visitor experience. Except for returning internees, few visitors would be able to grasp the impact of Manzanar without a good orientation to this historic chapter and the site. To quickly orient visitors to the many complex elements of this story would require a major A/V production to tell the broad story of early Japanese immigration, restrictive immigration policy, Pearl Harbor, the relocation orders, the camp experience, Japanese American military contributions during the war, and finally the aftermath of the camp experience.

With this grounding in the basics of the story, the visitor would be ready to learn about the Manzanar experience from the internees themselves. For maximum appreciation of the internment camp experience, the communication needs to be personal, involving one-on-one communication with shared experience between those who lived in the camps and the park visitors. This can be accomplished by extensive use of oral history and personal photographs. Whenever an image, quote, or voice is used in an exhibit, the person in the image making the quote or speaking would be identified. The experience then becomes not one of a certain group- Japanese

Americans- but one of individuals whose names you know and what they experienced and how they felt about the evacuation and internment.

Wayside Exhibits- An interpretive publication, containing a camp map, would explain the overall layout and mechanics of the camp. Wayside exhibits would be provided at points of interest in the camp, accessible by trails or one-way roads. Their overall purpose would be to expand on the themes presented in the visitor center, and make them more vivid and more specific to the Manzanar site itself. These exhibits would be low profile and, where feasible, make use of historic photographs of the particular point of interest on the actual site.

All residential block areas and the location of significant structures would be identified by suitable low profile signage to facilitate location of specific buildings and areas by visitors and staff.

Block 13, located immediately north of the auditorium, would be designated as a "demonstration" block. The corners of all structures in this block would be marked, and waysides would explain the design, function, and family-living implications of each of the structures, including barracks, mess halls, latrines, laundry rooms, etc. The location of each watch tower would be identified with a marker visible to visitors within the camp area.

All memorial plaques placed at the historic camp entrance, including the National Landmark Plaque, the State historical marker, and the Blue Star Memorial Highway marker, would be relocated for better display and protection to the vicinity of the interpretive center.

Personal Services- Guided walks of the site by NPS interpreters would be provided as staffing permits. A Volunteer-In-Parks (VIP) program, enlisting former internees and others as available, would be instituted as an important part of the interpretive program. These personal services programs would be directed both toward the general visitor, and also provide special assistance to former internees in locating features such as specific barracks within the camp.

Interpretive Prospectus- An interpretive prospectus would be completed to provide more detailed guidance in exhibits and programs.

CIRCULATION AND PARKING

Site Entrance- The entrance to the site would, at least initially, continue to be located at the stone sentry posts, which is the historic entrance. Low barriers would be placed in the area to prevent vehicles coming in contact with historic fabric, which includes the sentry posts and related rock alignments in the area. Experience with future park operations may indicate the need for personnel to control vehicle flow in

this area during peak use periods.

As discussed above, the memorial plaques currently located in this area would be relocated to the vicinity of the interpretive center. This relocation is necessary to restore the historic scene and to assist in limiting vehicle parking duration in the area and reducing the consequent congestion.

While the historic entrance provides by far the best entrance option from the standpoint of interpretation, the planning analysis revealed some potentially significant visitor and resource protection problems associated with its use. These include the potential for vehicles colliding with and damaging the stone sentry posts and other rock alignments in the area. The potential volume and concentration of vehicles and foot traffic in the area is also a matter of concern, both from a safety and traffic control standpoint and also in terms of impact on the historic scene. The unusual structures, combined with the scenic backdrop of the Sierra Nevada, make this a natural stopping and photography point for many visitors. While CALTRANS has completed new turn lanes on U.S. 395 at the historic entrance, the very high traffic volume (more than 2 million vehicles passing the site annually), presents significant traffic safety problems.

The workability of this entrance would be reviewed during the first five years of park operation. The feasibility of retaining it as the primary park visitor entrance would depend on the volume of traffic at the site, the success in protecting extant historic resources from damage, and whether visitor use at this location can be accommodated in a safe and orderly manner providing for a quality visitor experience. If these goals cannot be achieved, an alternate entrance would need to be provided. The NPS will work cooperatively with CALTRANS to develop such an alternative prior to the planned four-lane upgrading of U.S. 395.

In view of its possible future need as a primary park entrance, the existing non-historic road connecting Highway 395 and the auditorium would be retained during this five-year trial period, but access would be blocked. This road would be removed at such time as a decision is made to continue the use of the historic entrance permanently.

An auxiliary entrance, for park staff administrative use and to provide access during the annual pilgrimage, would be established in the vicinity of the camp cemetery. The existing unpaved road adjacent to the west boundary would be gated at the site boundary, and the limited traffic using this road outside the park would be rerouted on existing unpaved roads to the west of the site.

Highway 395 Widening- CALTRANS plans to upgrade Highway 395 to a 4-lane divided road as funds become available. While the current plan involves addition of two northbound lanes to the east, and continued use of the existing roadway for southbound traffic, the realignment of the entire 4-lane system further to the east

would better serve resource protection, safety, and visitor use objectives at the site. With this arrangement, the existing highway could serve as a frontage road. NPS would explore this concept further with CALTRANS as the highway planning and design process continues.

Internal Circulation- All roads improved for vehicle use would follow historic routes, and would conform to the historic width of approximately 15'. A one-way paved system would be developed to carry traffic between the historic entrance and the auditorium, and would be improved with turning radii suitable for most vehicles, including buses and towed vehicles. Other one-way roads accessing the camp area would either be paved or would be treated with a dust palliative. Due to the narrowness of these historic roadways, and the limited turning radii, buses, large RV's, and vehicles towing trailers would not be permitted on these roads.

Parking areas would be located in five locations as indicated on Map 4. The primary visitor parking area would be located immediately east of the auditorium. This area would necessarily be large enough to accommodate a variety of vehicles (autos, RV's, buses) for periods of one to two hours. The four parking areas in the camp area are intended to accommodate a smaller number of vehicles for a shorter period of time, and can accordingly be considerably smaller. Final location of these parking areas would be made based on natural and cultural resource protection needs, and the need to limit intrusion on the historic scene. The parking area located at the cemetery area would be designed with an overflow area to accommodate the large number of cars and buses at the annual pilgrimage. Only the main parking area at the auditorium would be paved; other areas would be compacted earth, treated with a dust palliative. Layout, design, and location of the parking areas would recognize the potential need for current overflow parking, as well as the possible need for future expansion.

VISITOR USE

Park Uses- The primary visitor use at the site would be historic appreciation. Only those visitor amenities essential to an interpretive visit to the site would be provided. No overnight camping facilities would be provided nor would recreational picnicking be encouraged or facilitated. The site is not intended to serve as a highway rest stop or general information facility.

The annual Manzanar Pilgrimage, or similar annual event, would continue at Manzanar, and would continue to be conducted in the cemetery vicinity. NPS would cooperate with the event organizers in conducting this event.

Facilities- All visitor facilities would be designed to be accessible to people with physical disabilities.

Public restrooms would be provided in the interpretive center. Potable water would

not be provided in outlying areas. The restrooms at the cemetery area would be supplemented by portable chemical toilets during the annual pilgrimage.

Benches would be provided at strategic locations along the interpretive routes.

Carrying Capacity- No formal studies of either physical or sociological carrying capacity for the Manzanar site have been completed. However, the levels of visitor use anticipated at the site would not result in resource degradation because visitor use pressures will be matched by management activity as needed to provide resource protection. Visitor management strategies for protecting resources would be periodically evaluated for effectiveness, and periodic visitor satisfaction surveys would ensure that the quality of the visitor experience remains high.

STAFFING

The site would be operated as a subunit of Death Valley National Park. Death Valley NP would provide most administrative and personnel services for the site. Staffing would be as follows:

- Park Superintendent
- Administrative Technician
- Supervisory Park Ranger
 - Park Rangers- PFT- 2
 - Park Rangers-Seasonal-2
- Maintenance Mechanic Supervisor-
 - Maintenance Worker/Motor Vehicle Operator-2
 - Laborers- PFT- 2
 - Laborers- Seasonal- 4

The park would seek to supplement its workforce with an active volunteer recruitment program in both interpretive and resource management activities. Cooperative agreements would be negotiated as feasible with Inyo County and other government agencies to supplement staff capability in law enforcement, curation, and maintenance.

ADMINISTRATIVE FACILITIES

Office space for the park staff would be provided in the auditorium.

NPS would acquire maintenance services by contract to the extent possible. Most major maintenance projects, e.g. road and utility work, and those requiring skilled labor such as plumbers and electricians, would be contracted.

Provision would be made in the reconstructed south wing of the auditorium for minimal maintenance storage and workspace to support routine onsite maintenance activities. No flammable or gasoline powered tools would be stored in this space.

Rental space would be obtained in local communities as needed to provide a modest workspace for shop activities, storage for supplies and materials, and storage for park vehicles. Consideration would be given to acquisition of a "shop" vehicle, e.g. a van, truck, or trailer outfitted with tools to perform a wide range of routine maintenance functions throughout the site. This vehicle would be parked at the offsite maintenance facility.

No park housing would be provided on site.

UTILITIES

Water rights to the Manzanar site would be retained by the City of Los Angeles and water for the park would be provided pursuant to an agreement with LADWP.

Water supply for the interpretive center would be provided by groundwater, with sufficient storage capacity developed to meet peak load demands and emergency fire-fighting needs. Water tanks would be located so as to minimize adverse impacts on the scene. Options for water supply for camp area irrigation would be investigated in conjunction with LADWP.

Sewage treatment requirements would continue to be provided by septic tanks and leach fields. The existing system would be expanded as required.

Commercial electrical and telephone services are available at the site.

BOUNDARY

The boundary would consist of the area identified in the legislation. No boundary changes would be made. A sufficient real property interest would be acquired to allow surface management and protection of the site. Surveys of hazardous wastes and dump sites within the boundary would be completed and action taken as provided in Interior Department guidelines.

The park would work cooperatively with LADWP and BLM toward continued protection of the historic scene and continued data collection, protection, and interpretation of historic resources on the several thousand acres of adjacent lands that were part of the Manzanar Relocation Area. Attention in this effort would be particularly focused on resources of known interest and significance such as the camp reservoir and water distribution system, hog ranch, chicken ranch, Military Police compound, the historic camp dumps, and other prehistoric and historic resources

known to be located in adjacent areas.

The effectiveness of these cooperative efforts in protecting important resources would be monitored over time and, if found not to be successful, consideration would be given to further expansion of the authorized boundary through either administrative or legislative action.

PARTNERSHIPS

Partnerships with other government agencies and with private organizations can contribute significantly to providing successful resources protection and quality visitor experiences at Manzanar NHS. Some of the potential partners with whom NPS would seek cooperative relationships include the following:

- Eastern California Museum
- American Society of Landscape Architects
- Manzanar Committee
- California Department of Transportation
- Los Angeles Department of Water and Power
- Independence Fire District
- Bureau of Land Management
- Inyo National Forest
- Inyo County
- Eastern Sierra Interagency Visitor Center
- Independence Civic Club
- Lone Pine Chamber of Commerce
- California Department of Forestry
- Paiute-Shoshone Cultural Center
- Laws Railroad Museum
- California Department of Fish and Game
- California Highway Patrol
- Death Valley Natural History Association
- Boy Scouts of America
- Owens Valley Interagency Committee on Lands and Wildlife

MANAGEMENT ZONING

Management zoning prescribes the primary management emphasis for given areas and limits the actions that can be taken in that area. All of the lands within the boundary would be zoned as historic with the exception of minor areas for parking, which would be classified as development zone, and the riparian corridor of Bairs Creek, which would be zoned as natural.

COST ESTIMATES

Annual operation and maintenance costs for this alternative are estimated at \$ 780,000. Cost estimates for major plan features are shown in Appendix 4.

ALTERNATIVES CONSIDERED BUT REJECTED

Several alternative concepts were discussed during the scoping process and during planning team deliberations. These are briefly outlined below along with the rationale for not evaluating them in detail.

The concept of making major boundary additions to encompass substantial portions of the several thousand acre reservation was considered but rejected because this would be beyond the scope of legislative intent and because public ownership of the surrounding lands may make it feasible to protect the historic scene and key extant resources through cooperative efforts.

Extensive reconstruction of camp structures was suggested during scoping but was rejected because of adverse visual impacts, high costs, and conflicts with established NPS policy on historic structures.

The use of portions of the site for recreational areas or campgrounds was suggested but such use was found to conflict with the primary purpose of the site, which is historic preservation and appreciation.

A proposal for construction of a large-scale ceramic mural, memorializing the broad sweep of Japanese American history, was suggested during scoping but was rejected because of conflicts with the site purpose and impacts on visual quality. Much of the subject matter of the mural would, of course, be covered by exhibits in the visitor center.

THE AFFECTED ENVIRONMENT



Photo: National Archives

THE AFFECTED ENVIRONMENT

SOCIOECONOMIC ENVIRONMENT

Land Use- The Owens Valley, location of Manzanar NHS, is a lightly populated intermountain desert valley. The land in the vicinity of Manzanar is undeveloped, and is primarily used for grazing. Population centers include Lone Pine (population 1700), located 9 miles south of Manzanar, and Independence (population 600), located 5 miles north. Independence is the county seat of Inyo County. The Valley's principal population center is Bishop (population 3700), located 46 miles north of the site.

Much of the land in the Owens Valley is publicly owned. The Los Angeles Department of Water and Power (LADWP) has extensive land holdings in the valley as a result of its water rights acquisitions early in the century. The Bureau of Land Management (BLM) also manages substantial acreage on the valley floor. Both BLM and LADWP lands are leased or allotted to private parties for grazing use but are also accessible to the general public for various dispersed recreation activities such as hunting and fishing.

Lands in the mountains to the west and east are either National Forests, managed on a multiple-use basis, or National Parks, the latter including Yosemite, Sequoia, and Kings Canyon. The mountains provide extensive recreation opportunities throughout the year.

The Manzanar site itself currently receives some seasonal grazing use by cattle under a permit with LADWP. The site is also open and accessible to the general public and receives a variety of uses including off-highway vehicle driving, hunting, and wood gathering. LADWP also recently made the site available as a movie set. These existing uses have had a range of adverse impacts on the cultural resources.

Transportation- U.S. Highway 395 is the Owens Valley's primary transportation corridor, carrying substantial tourist loads into the area from points north and south. Traffic loads on Highway 395 in the vicinity of the historic site average approximately 6000 vehicles per day, with peak loads in mid-summer but substantial traffic flow throughout the year. Highway 395 is in the process of being upgraded from a 2-lane road to a 4-lane divided highway. Portions of the route to the north and south of the Manzanar site have been upgraded over the last few years, and the section between Lone Pine and Independence will be upgraded as funds become available. These highway improvements can be expected to increase the safety and speed of access to Owens Valley attractions and bring more visitors in future years.

There has been considerable interest in recent years in paving the road between the town of Big Pine and the north end of Death Valley National Park. Completion of this project would facilitate tourist travel between Highway 395 and Death Valley and

could stimulate additional travel in the area. This project has not as yet been programmed, however.

Air service to the Owens Valley is limited, with airports at Independence, Lone Pine and Bishop serving only private aircraft. The nearest regularly scheduled commercial service is to Inyokern, 82 miles south of the site on U.S. 395.

CULTURAL ENVIRONMENT

Prehistory/Ethnography - Manzanar is within the Great Basin culture area, which includes portions of California, Oregon, Utah, Nevada, and Colorado lying between the Sierra Nevada and the Rocky Mountains. Prehistorically, the Great Basin culture area shows evidence of such cultural sequences over time as the Paleo-Indian (12,000-9000 B.C.), the Great Basin Desert Archaic (9000 B.C.-A.D. 500), the Fremont (A.D. 500-1300), and the Paiute and Shoshone (A.D. 1300-present). The prehistoric cultural patterns indicate, in general, that Paleo-Indians in small, mobile groups hunted large Pleistocene fauna for their primary subsistence. People of the Archaic developed a broader subsistence base, hunting and gathering a variety of animals and plants. The Fremont was characteristic of more sedentary villages supported by horticulture coupled with hunting and gathering. Between A.D. 600 and A.D. 1000 there were population increases in the Owens Valley associated with greater exploitation of regional alpine ecological niches. Just when the configuration of the different groups in the Owens Valley occurred is unclear with Paiutes north of a small incursion of Western Shoshones at the southern end around Owens Lake.

The Paiutes and Shoshones in the Owens Valley were dispersed in small kin groups with seasonal rounds tied to water sources and harvest cycles of mountain and valley. An aboriginal form of irrigation was practiced by the Paiutes of Owens Valley. Because ties to village and district apparently correlated with the management of resources, Owens Valley sociopolitical organization may have been more complicated than the typical extended family-band model of organization generally associated with the Great Basin. Larger groups may have existed based upon territories and cooperation as to who used them when.

In Paiute and Shoshone culture, subsistence was heavily based upon the gathering of wild plants and small land fauna with a significant but smaller percentage of subsistence based upon hunting larger animals. Fishing figures in where available but not as much as hunting. A distinctive feature is Paiute irrigation in terms of water diversion and management to promote the growth of certain plants, that is, the irrigation of plots of wild seeds. There was no reliance aboriginally on animal husbandry, raising domesticated animals, or on agriculture as we know it as the large-scale pursuit of field crops. Houses were round and varied in brush construction with the season.

Small extended families were the norm with some activities centering at times on the nuclear family, in which the father and mother with their dependent offspring behaved independently of other family members or family groups. Residence at marriage was sometimes with the wife's kin or in their locality, but often with the husband's. In the conventional view, communities were largely autonomous with essentially no reference to any larger or regional decision-making groups. There was a tendency to marry out of the group, that is, to find a spouse in another community. Kinship descent was/is bilateral, like Euro-American reckoning, in which relatives were/are defined through both one's mother and father, not just the father as in patrilineal kinship descent, or the mother as in matrilineal. Often sons were expected to follow their fathers as local headmen or political leaders.

History- Settlers began to arrive at the Manzanar vicinity in the early 1860's in search of feed for cattle and opportunities to establish farms. Many subsequently homesteaded in the area. Indian objections to this incursion into their lands were dealt with harshly by the Army, which forcibly removed most of the Indian inhabitants to Fort Tejon in 1863. Many of the Indians subsequently returned to the valley, which they were now obliged to share with the newcomers. Many Paiutes worked on the ranch of John Shepherd, a major landowner in the vicinity whose holdings ultimately included most of the Manzanar site.

Early in the 20th century, interests in the area began to turn toward the development of irrigated agriculture, particularly for fruit trees. Water rights were consolidated, distribution systems installed, lands purchased and subdivided into salable units, and extensive marketing employed to encourage outsiders to move to the Owens Valley and make their fortune in the fields. One such development occurred at the Manzanar site beginning in 1910. The area was known as the Manzanar Irrigated Farms, and it was heavily promoted by agents in San Francisco and Los Angeles.

Over the next two years the basic features of a community were established as new farmers arrived not only from San Francisco and Los Angeles but from parts of the midwest as well. By 1912, the area had a store, two-room schoolhouse, blacksmith shop, and community hall, as well as a number of newly constructed individual homes. By 1920, Manzanar had 57 households and 203 residents, and attendance at the Manzanar school was approaching 50.

In 1924, the City of Los Angeles began to actively purchase land in the Manzanar area to secure water rights, and by 1927 had purchased most of the Manzanar properties. Farming activities nevertheless continued under lease until 1934, when Los Angeles terminated its irrigation in the area. By 1941 the area was completely abandoned except for the remnants of structures and the orchard trees and landscape plantings capable of surviving without irrigation.

But the Manzanar site was not abandoned for long. In February, 1942, President

Roosevelt signed Executive Order 9066, authorizing the Secretary of War to exclude citizens and aliens from certain areas. This order provided the legal basis for the relocation program, which resulted in the establishment of the Manzanar War Relocation Center and 9 other similar centers in inland locations to confine Japanese Americans residing on the west coast until such time as they could be relocated to inland or east coast areas.

Manzanar was the first center to become operational, with internees beginning to arrive in March, 1942. The relocation process, conducted by the Army, was largely completed by August, 1942, with a Manzanar population of about 10,000. Most of the Manzanar internees were from southern California, consisting largely of farmers, fishermen, and small business owners. A small contingent of Washington State fishermen was also relocated to Manzanar.

The area at Manzanar set aside for the relocation center and related activities amounted to about six thousand acres and included agricultural plots and water storage reservoirs in addition to the camp. A military airfield and sewage treatment plant were located on additional lands east of Highway 395. The area occupied by the internees was slightly smaller than a square mile. It was secured by barbed wire fences and watch towers at the corners and midpoints of each side. Also within the enclosed area were offices and housing for the government administration personnel and factories for the production of camouflage nets and other goods.

The camp was divided into 36 residential blocks, each consisting of 14 barracks plus mess halls, laundry rooms, a recreation hall, and bathrooms. These blocks became important sociological units in the camp's social structure. Tiers of blocks were separated by open-space areas, referred to in the plot plan as firebreaks, but which were intended to serve as crowd control space if needed. (See camp layout in Map 3.)

When the internees arrived, they found their living quarters to be cheaply constructed 20' by 100' tarpaper-covered barracks, each minimally divided into four or five family living quarters. The site had been largely stripped bare of vegetation, except for a few remaining fruit orchards.

Facilities with camp-wide use and significance, e.g. schools, stores, work areas, parks, churches and religious centers, major recreational features, etc., were distributed at various locations throughout the camp.

The internees made significant improvements to the site, both to their own living quarters to make them more livable, and to the site itself, greatly improving the community facilities, engaging in extensive landscaping, and developing highly productive "victory gardens" wherever space was available.

As the war progressed, adverse reaction to the relocation program mounted, and more and more residents received permission to leave the camp for military service, college, and work. The population of the camp declined, reaching a level of about 5000 in 1944. In 1945, the camp was closed, the barracks were sold off, and, with the exception of the auditorium, most of the salvageable materials were removed.

Between 1945 and the present, the primary use of the site has been for grazing and low-intensity uses such as hunting, wood-gathering, and harvesting fruit from the remaining untended fruit trees. The auditorium has served various uses since the camp closure, most recently as an Inyo County vehicle maintenance shop.

Cultural Resources- As indicated above, there are three intact buildings within the authorized boundary, all features of the relocation camp. These include the auditorium, still in use by Inyo County, and the two rock sentry posts located near Highway 395. These latter structures are not in use but have been maintained over the years as landscape features.

An archeological survey of the camp and surrounding related area was conducted in 1993, 1994, and 1995. Extensive evidence of Indian use and occupation, pioneer homes, the Manzanar agricultural subdivision, and the wartime relocation center were found and recorded. Six primary Native American sites were located based on surface and subsurface materials. Overlapping and in some cases overlying these areas, especially in the more northerly portions of the site, are structural remnants and trash dumps associated with the town of Manzanar. Surface phenomena, including loose materials and more substantial structures, such as barbecues, planters, retaining walls, and structural remnants such as concrete slabs, pipes, and constructed landscape ponds, associated with the relocation center are found in great number throughout the camp area and in related areas outside the camp such as the chicken ranch, hog farm, military police area, and various dumps. Numerous inscriptions, in both Japanese and English, were found on structural remains throughout the camp.

The Park Service collection of objects associated with Manzanar is currently stored at the Western Archeological and Conservation Center in Tucson. The Eastern California Museum, located in nearby Independence, has a substantial collection of such objects and a number of individuals are known to have private collections. Given the potential for donations, and the substantial amount of material on the site and in camp dumps, there is the potential for NPS to amass a very substantial collection of historic objects.

Appendix 5 contains the List of Classified Structures for the historic site. This is subject to updating as additional surveys and inventories are completed.

Ethnography- The Paiute and Shoshone people retain an affinity for the Manzanar area, and it is regarded by some as having significant spiritual values. It is known that

some portions of the site have been inhabited for many centuries, and there is at least one known burial in the area. Paiute and Shoshone people in the area maintain an interest in activities relating to the site. However, the recent ethnographic assessment did not reveal the presence of any specific traditional cultural loci.

NATURAL ENVIRONMENT

Topography, Geology, and Soils- The camp area lies near the valley floor at an elevation of about 3800'. The terrain slopes gently and regularly from west to east toward the valley trough and the Owens River. To the casual observer the camp appears basically level. The only significant topographic breaks are the result of natural erosion from Bairs Creek in the southwestern corner of the camp, and more recent erosion in the northwestern portion of the camp caused by LADWP channeling and water spreading.

Soils are composed of alluvial materials deposited by erosion of the Sierra Nevada Mountains. Materials are coarse and well-drained.

The faulting processes that created the mountains and the valley remain active. Faults are prevalent in the area, and low-intensity seismic activity occurs frequently. Severe and highly damaging earthquakes have occurred periodically in recorded history and may be expected to recur. A major fault line west of the camp allows groundwater to surface in a north-south belt, a feature which historically attracted both Native Americans and Anglo settlers to the Manzanar area.

Hydrology- The primary natural watercourse in the camp area is Bairs Creek, which crosses the camp's southwest corner, flowing west to east toward the Owens River. This stream is intermittent, carrying substantial flows during periods of spring and summer runoff, but tapering off to minimal or no flow during fall and winter months, although some pools generally remain throughout the year. LADWP water-spreading operations have also resulted in unnatural channels in the west-central and north-central portions of the site. These channels have contributed to erosion and destruction of historic fabric on some portions of the camp. Significant damage occurred in the hospital and Childrens' Village areas in the summer of 1995 as a result of water spreading activities.

Flood history for the area is not well documented, and regulatory floodplains have not been identified. There is anecdotal evidence of occasional sheet flooding over large portions of the site at times when periods of snowmelt runoff coincide with summer thunderstorm activity. It is not clear whether this flooding is a natural phenomenon or the result of manmade channels and diversions.

Groundwater depths are quite shallow in the area. LADWP manages runoff in the vicinity to promote groundwater recharge. Much of the basin's water is exported by

LADWP to the City of Los Angeles.

Lands in the immediate vicinity of Bairs Creek are flooded with some frequency and may ultimately be defined as wetlands, although a formal wetland survey has not yet been completed for the area.

Vegetation and Wildlife- The natural vegetation of the Manzanar vicinity is Great Basin sagebrush scrub, characterized by low shrubs such as sagebrush, saltbush, and rabbitbrush, and a variety of forbs, cacti, and grasses. While natural vegetation patterns are reasserting themselves over much of the camp, the twentieth century agricultural and residential uses have significantly affected the vegetation on the site. Numerous non-native species were planted by internees as landscaping, and remain today in areas throughout the camp. Black locust trees, in particular, have prospered in the area and spread significantly from original sites to produce dense cover and become a major landscape feature. Tamarisk, also, has grown from what were likely single plantings to large and dense clumps. A number of the fruit trees from the Manzanar town days also remain, both as single specimens and in small groves located in firebreaks.

Wildlife species occurring on the site are those characteristic of the Great Basin region, including a range of mammals, especially rodents and predators such as foxes and coyotes, reptiles including rattlesnakes, and birds. A substantial quail population in the area generates considerable hunting use in season.

Threatened, Endangered, and Candidate Species- The Fish and Wildlife Service has identified several threatened, endangered, and candidate species that may be found in the Manzanar vicinity. Listed species include two fish, the Owens Tui Chub and the Owens pupfish, and one bird, the Least Bell's Vireo. A number of additional candidate species, including fish, birds, mammals, and plants, may be present in the vicinity. (See complete list with common and scientific names in Appendix 2.) None of the listed or candidate species have been documented in the study area.

Air Quality- Air quality in the Owens Valley is very good except in the category of inhalable particulates, where there are major deficiencies because of dust generated in the Owens Lake area. The Manzanar site is not a significant source of particulates.

A complete and detailed analysis of air quality is provided in Appendix 6.

VISITOR USE ANALYSIS

As discussed above, the area of the camp is open to the general public and receives a variety of uses, some incompatible with protection of the resource values. Public use at the site related to historical aspects currently consists primarily of passersby drawn to the area by the unusual stone sentry posts and the historic

plaques. There are no facilities or park personnel available to serve the public at the present time. Visitors generally stay a short time.

The Manzanar Committee holds an annual reunion at Manzanar in late April. Attended by a mix of Los Angeles basin and local people, this day long event draws from 150-300 people. The reunion is centered on the area of the cemetery, and open areas in the vicinity are used for car and bus parking.

Preliminary estimates have been made of projected public use at the historic site once a visitor center and public use facilities have been developed. These estimates project from 200-250,000 visitors in 1995, increasing to from 230-290,000 by 2010. The estimates take into account the tourism trends in the area and are generally consistent with other public attractions in the area. Significant visitation in the summer travel period by foreign visitors is anticipated.

While visitor use projections are useful for planning purposes, it is difficult to reliably estimate future visitation figures for a newly established unit. Most knowledgeable observers of the regional travel and recreation situation feel these estimates are conservative.

The use estimates predict that peak use would occur at the site in the summer period, with average daily weekend visitation ranging from 850 to 1100 in 2010. Substantial use at the site would be expected year around, however, based on winter Highway 395 traffic between ski areas to the north and the Los Angeles basin to the south. U.S. 395 is also the primary link between the Los Angeles basin and Reno.

FACILITY ANALYSIS

Roads and parking on the site are adequate to handle the existing range of site uses but would not adequately serve the projected use levels. Roads are rough and unpaved, and in many areas deep sand deposition causes vehicles to become stuck. Parking currently is provided by a large graded area in back of the auditorium, and by graded areas in the vicinity of the cemetery. These latter areas provide parking for those attending the annual pilgrimage.

The auditorium is structurally sound but is in need of routine maintenance such as exterior painting, and rehabilitation of the roof, windows, doors, and other features. An integrated pest management plan is needed to control bees, birds, and rodents.

The auditorium is currently served by water, sewer, and electrical utilities. Water supply is provided by an onsite well, which produces high quality water, sufficient to meet the daily needs of a small staff. However, the water system is not adequate to meet structural fire-suppression requirements, or the demands from a significant level of visitation. Waste treatment is provided by a septic system, which has been

installed in recent years and is functioning adequately. Commercial electrical power and telephone service are available at the auditorium.

ENVIRONMENTAL CONSEQUENCES



Photo: National Archives

ENVIRONMENTAL CONSEQUENCES

THE PROPOSED GENERAL MANAGEMENT PLAN

Regional Economic Implications- The project would serve from 230,000-290,000 visitors per year by 2010. Some of these visitors would be drawn to the region specifically by the Manzanar NHS, although most would visit the site as part of a broader itinerary. These additional visitors, and the additional time spent in the region would result in additional spending and contributions to the regional economy.

Cultural Resources- This alternative provides protection to historic and prehistoric cultural resources by establishing a law enforcement presence to prevent theft and vandalism, by controlling erosion to prevent damage to resources, and by providing a regular program of maintenance and curation for important features and artifacts.

The cultural landscape would be enhanced by actions taken to prevent soil deposition and vegetative growth from obscuring the camp's gridwork.

Features proposed in this alternative would have a beneficial effect on the historic scene.

Visual Quality- The natural appearance of portions of the area would decline to some extent as vegetation is removed and road widths are restored to display the camp gridwork. The natural character of the area would also be diminished by adding a barracks structure and a watch tower structure in areas that are currently relatively open and natural.

Vegetation and Wildlife- Vegetation within the camp area, both natural and alien, would be slightly reduced under this alternative, leading to some loss of habitat value. Vegetation in riparian areas would not be affected by the project, and all vegetative clearing would be preceded by surveys to ensure that no threatened, endangered, or candidate species of plants or animals are affected.

Water Resources- The proposed water supply agreement with LADWP would ensure a continuous water supply of 10,000,000 gallons annually for current and anticipated park needs. Water would be pumped from wells in the area to serve the 230,000 annual visitors, and some additional water would be pumped to irrigate selected orchards and landscaped areas. Some of this water would evaporate or be transpired-most would be returned to groundwater after onsite treatment. Septic tanks and leach fields would be used to treat project wastewater. All wastewater treatment facilities and operations would be in accordance with applicable laws.

No facilities would be placed in known regulatory floodplains and there would be no impacts on areas adjacent to Bairs Creek that may eventually be classified as

wetlands. The Bairs Creek corridor would be managed as a natural area.

Erosion and sediment inflow to watercourses from the project area should be reduced in the long term. Very little new ground will be disturbed as a result of the project, e.g. the large parking lots at the auditorium and cemetery areas will be located on already-disturbed ground, and cooperative planning with LADWP for surface water management should reduce overland flow in the project area. In addition, elimination of grazing and off-road vehicle driving should enable vegetation in some disturbed areas to recover and better hold the soil.

Air Quality- A complete and detailed evaluation of the potential environmental consequences on air quality is presented in Appendix 6. The following is a brief summary.

Dust generation sources are a major concern in the Owens Valley because this area has a long history of non-attainment of federal and state standards for inhalable particulates. Overall it is not expected that the project will contribute to the particulate problem. While some minor clearing, and subsequent exposure of soils will occur with the project, dust palliatives will be used to limit dust production. Also, the elimination of grazing and off-road vehicle activities from the site will allow some exposed areas to recover and revegetate. The analysis presented in Appendix 6 shows essentially the worst case particulate production scenario for the project, which is well below the established "de minimis" values, rendering the project exempt under the Clean Air Act. In fact, the elimination of grazing and OHV use may result in a net improvement in particulate production at the site in the long run.

The project would stimulate some minor additional motor vehicle travel to and within the Owens Valley area, leading to production of air pollution components generated by internal combustion engines. However, most visitors to Manzanar would be travelling to other destinations in the eastern Sierra area and the incremental impact would be very minor.

Visitor Use- Visitor use would be significantly expanded by this alternative. Plan features are expected to serve 230,000-290,000 visitors per year by 2010, providing a quality historic interpretation experience.

Environmental Justice- Under Executive Order # 12898, issued by President William Clinton on February 11, 1994, agency compliance under the National Environmental Policy Act is to include analysis of the environmental, social, and economic effects on minority and low-income communities. The final plan is not expected to create any adverse impacts on minority or low income communities, but rather would expand recreational and educational opportunities for those communities as well as for the general population.

Short Term Uses and Long Term Productivity- This alternative would discontinue those minor existing uses that are leading to the decline of the nationally significant cultural resources, and provide for the long term productivity of the site as a locus for historic interpretation and understanding.

Irreversible Commitments of Resources- The only irreversible commitment of resources in this alternative is the labor and capital employed in development of facilities and operation and maintenance of the site as an historic site.

Cumulative Impacts- Implementation of this alternative, with its planned cooperative and partnership arrangements, would be expected to stimulate and encourage protection of related historic resources on adjacent lands, resulting in beneficial cumulative impacts to cultural resources.

ALTERNATIVE A: NO ACTION

Regional Economic Implications- Manzanar would continue to represent a casual roadside attraction to persons traveling on Highway 395. Visitors would stop only for a few minutes. No new visitors would be attracted into the Owens Valley area.

Cultural Resources- The extant cultural resources, both historic and prehistoric, would continue to decline as a result of uncontrolled vandalism, personal collection of artifacts, erosion, and unremediated weathering.

The camp's defining cultural landscape features, e.g. the road grid, would continue to diminish as a result of the continued spread of black locust and other alien tree species, and due to the desert reclaiming the camp and covering it with a blanket of soil and typical Great Basin desert vegetation.

Visual Quality- The appearance of the area would become more natural over time and more compatible with the surrounding area. By most standards the visual quality would improve, inasmuch as the camp itself represented a harsh and visually dissonant scar on the desert landscape.

Vegetation and Wildlife- Desert vegetation would reassert itself over time and native wildlife should be benefitted by this change.

Water Resources- The project would not result in any additional water withdrawal and use. Periodic flooding during spring runoff would continue to cause erosion in the study area.

Air Quality- No significant impacts would occur in this area. Some marginal improvement in wind-blown particulates could occur as native vegetation is further established and as the black locust groves spread and provide wind-breaks.

Visitor Use- No impacts on visitor use would occur.

Environmental Justice- Same as proposed plan.

Short Term Uses and Long Term Productivity- This alternative permits existing activities such as grazing, vandalism and personal collecting to continue, thereby leading to losses to long term productivity since the site becomes less capable of providing a meaningful experience to future potential park visitors.

Irreversible Commitments of Resources- Irreversible and irretrievable commitments would accrue to this alternative in terms of losses of historic and prehistoric artifacts and fabric to vandalism, theft, and erosion. The choice of this alternative would

sacrifice a part of a nationally significant cultural resource.

Cumulative Impacts- This alternative involves a decision not to take steps to protect the site's cultural resources. This action, combined with the long history of theft, intentional destruction, and deterioration through weathering, would contribute to significant cumulative adverse impacts on cultural resources.

ALTERNATIVE B: MINIMUM REQUIREMENTS

Regional Economic Implications- Regional implications would be similar to the proposed plan.

Cultural Resources- Similar to the proposed plan, except that a smaller area would be included and formally protected.

Visual Quality- Similar to the proposed plan, except with slightly less impact on natural appearance since reconstruction would not be included.

Vegetation and Wildlife- Similar to the proposed plan.

Water Resources- Same as the proposed plan.

Air Quality- Same as the proposed plan.

Visitor Use- Similar to the proposed plan, but provide a somewhat lower quality visitor experience.

Environmental Justice- Same as proposed plan.

Short Term Uses and Long Term Productivity- Same as the proposed plan.

Irreversible Commitments of Resources- Same as the proposed plan.

Cumulative Impacts- Same as the proposed plan.

ENVIRONMENTAL CONSEQUENCES MATRIX

ENVIRONMENTAL FACTOR	PROPOSED GENERAL MANAGEMENT PLAN	ALTERNATIVE A: NO ACTION	ALTERNATIVE B: MINIMUM REQUIREMENTS
REGIONAL ECONOMY	230,000-290,000 visitors to site. Increased demand for services in adjacent communities.	No increased visitor use at site and related demands for goods and services.	Same as proposed plan.
CULTURAL RESOURCES	Effective protection of historic and prehistoric resources from theft and vandalism. Reduction of effects of weathering through erosion control and scheduled maintenance.	Continued degradation of prehistoric and historic resources through weathering, theft, and vandalism.	Same as proposed plan, but with protection of an area 245 acres smaller.
VISUAL QUALITY	Visual quality would decline as visually disharmonious elements of the camp, including the road gridwork, are restored.	Area's appearance would become more natural over time and more compatible with surrounding natural landscape.	Similar to the proposed plan, but somewhat less impact without reconstructions.

ENVIRONMENTAL FACTOR	PROPOSED GENERAL MANAGEMENT PLAN	ALTERNATIVE A: NO ACTION	ALTERNATIVE B: MINIMUM REQUIREMENTS
VEGETATION, SOILS, AND WILDLIFE	Natural reclamation processes would be restrained and to a small extent reversed to expose the camp's road grid. Reduction of vegetation and related wildlife habitat would be minor. Floodflows would be managed to reduce erosion on the site.	Natural processes would continue to reclaim the site with increased native vegetation and likely enhanced wildlife habitat. Erosion from overland flows would continue.	Same as the proposed plan.
WATER RESOURCES	Additional groundwater would be withdrawn to serve domestic and irrigation use on the site. Annual estimated water use would not exceed 10,000,000 gallons.	No additional local withdrawals from groundwater.	Same as the proposed plan.
AIR QUALITY	Minor increases in vehicle generated emissions due to increased tourist travel. Very minor increases in air-borne particulates due to reduction in vegetative cover.	No change from present conditions.	Same as the proposed plan.

ENVIRONMENTAL FACTOR	PROPOSED GENERAL MANAGEMENT PLAN	ALTERNATIVE A: NO ACTION	ALTERNATIVE B: MINIMUM REQUIREMENTS
VISITOR USE	Visitor use reaching 230,000-290,000 visitors in 2010.	No change from present. Minor inconsequential use would occur.	Same as the proposed plan, except a somewhat lower quality experience and possibly a slightly lower visitation level.
ENVIRONMENTAL JUSTICE	No impacts.	No impacts.	No impacts.

CONSULTATION & COORDINATION



**CONSULTATION AND COORDINATION
IN THE DEVELOPMENT OF THE GENERAL MANAGEMENT PLAN
AND
PREPARATION OF THE ENVIRONMENTAL IMPACT STATEMENT**

SCOPING

Scoping for the Manzanar General Management Plan was initiated with a Federal Register notice on April 23, 1993 and continued until June 30, 1993. Three public scoping meetings were held (one in Independence and two in Los Angeles) and comments were recorded. Additional comments were provided in 27 letters, and in petitions signed by 275 individuals. The petitions asked that the site truthfully reflect the experiences of the Japanese Americans confined in the relocation centers.

REVIEW OF THE DRAFT GENERAL MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT

The draft document was mailed to interested groups and individuals on February 7, 1996 with a comment closing date of May 3, 1996. Availability of the draft document was formally announced by the Environmental Protection Agency in the Federal Register dated February 23, with the minimum required 60-day period of availability ending April 23. A Park Service notice of availability appeared in the Federal Register of February 20. News releases announcing the availability of the document and the scheduling of public meetings were broadly distributed in the Owens Valley and regional media.

The following agencies and organizations received copies of the draft document:

Bureau of Land Management, California State Office, Sacramento
Bureau of Land Management, Bishop Resource Area, Bishop
U.S. Fish and Wildlife Service
 Regional Office, Portland
 Division of Ecological Services, Ventura
Environmental Protection Agency
Advisory Council on Historic Preservation
California State Clearinghouse
California Dept. of Transportation
California State Historic Preservation Officer
California Native American Heritage Commission
Los Angeles Department of Water and Power
Inyo County
 County Administrator
 Public Works
 Eastern California Museum

Library

Manzanar Committee

American Society of Landscape Architects

Japanese American Citizens League

Japanese-American National Museum

Japanese-American National Historical Society

Paiute/Shoshone Indians of the Bishop Community of the Bishop Colony

Big Pine Band of Owens Valley Paiute/Shoshone Indians

Fort Independence Indian Community of Paiute Indians

Paiute/Shoshone Indians of the Lone Pine Community

Owens Valley Paiute-Shoshone Indian Cultural Center

Lone Pine Tribal Council

Bishop Tribal Council

Big Pine Tribal Council

Bishop Museum

In addition, several hundred copies of the draft plan and EIS were sent to interested individuals.

Four public meetings on the draft plan and EIS were conducted March 12-16. Sites for the meetings were Bishop, Independence, Gardena, and Los Angeles, all located in California.

Public comments on the draft GMP/EIS were received and recorded at the four public meetings, and by written communications to the Park Service and Secretary of the Interior.

The four public meetings were attended by 178 persons, 43 of whom made comments for the record. A total of 194 written communications on the draft were received during the comment period. These communications included two petitions, 135 copies of a form letter, and 57 individually prepared letters.

CONTENT OF PUBLIC REVIEW COMMENTS

Comment on the GMP/EIS was highly polarized with most reviewers opting either for the proposed action (Alternative C), with an expanded boundary, or for deauthorization of the site as a unit of the National Park System.

In addition to statements of preference among the alternatives and comments on the substance of the plan, many reviewers offered extraneous but often emotional expressions regarding the moral correctness and military necessity of the relocation program and the use of certain emotive terms such as "concentration camp". Several respondents also expressed apprehension that NPS would not factually present the true conditions at the camp, but would subjugate facts to "political correctness" and

the avoidance of controversy. This concern was expressed both by those who support the existence of Manzanar National Historic Site and by those who regret its authorization. In addition, certain historical facts related to the site are strongly disputed by some individuals.

135 copies of an individually signed and submitted form letter were received which:

1. Recommended selection of Alternative C.
2. Urged further expansion of the boundary to include 800 acres.
3. Requested an immediate increased operating budget for the site.
4. Urged prompt action to implement the plan.

A copy of the form letter is printed in Appendix 7.

A petition circulated in the Bishop area, signed by 109 persons, expressed the desire that Manzanar not be a "monument for Japanese Relocation Camps" and expressed the opinion that the costs of the site would exceed income or revenue.

Another petition circulated in the Bishop area, signed by 55 persons, asked that the site be operated as economically as possible and that American Indian and pioneer history be given equivalent coverage to the internment period.

Copies of both petitions are printed in Appendix 7.

A total of 57 individual letters were received from agencies, organizations, and individuals. 25 of these letters recommended selection of Alternative C and noted various issues. A total of 8 letters indicated overall opposition to the site itself being in the National Park System for various reasons. The remaining 24 letters did not express preferences among the alternatives but offered opinions regarding the propriety of the relocation program, the use of terms to describe the site, critiques of the analysis of environmental impacts, and specific suggestions for additional features or programs at the site.

Of the forty-three persons making oral statements at the public meetings, a total of 22 expressed support for Alternative C, while 3 persons indicated a preference that the site not exist. The remaining 18 persons offered views on various aspects of the alternatives or the appropriate uses of terms. Manzanar Advisory Commission member Vernon Miller polled the attendees at both the Gardena and Los Angeles meetings re their support for Alternative C and the show of hands revealed nearly unanimous support among the 81 persons attending those meetings.

Copies of all written statements, as well as tapes of oral comments received at the public review meetings regarding the plan, are available for inspection at the office of

the superintendent of Manzanar National Historic Site.

NATIONAL PARK SERVICE RESPONSE TO COMMENTS

Copies of letters encompassing all substantive issues are printed in Appendix 7 along with the National Park Service response to those issues, indicating to what extent they are addressed in the final plan. The issues in the letters are inclusive of issues surfaced in oral statement at the public meetings.

A number of issues were surfaced during the public review process which are not relevant to the general management planning process and cannot be resolved at this time. These are outlined below.

A number of respondents seemed to be under the impression that the establishment of a National Historic Site was under consideration. In fact, the site has been established by Congress and the current planning process is intended to determine how best to preserve the site and make it available for public use.

Several respondents indicated concern that NPS interpretation at the site would misrepresent the conditions at the camp by either understating the hardships on the internees, or by overstating the hardships. The general management plan proposes general areas of interpretive coverage but does not define the details of interpretive treatments and programs. The Park Service intends to interpret the site in a factual manner, supported by extensive historical research which is underway. As interpretive materials are developed, the Park Service will actively solicit critical evaluations from the public toward the end of providing historically accurate information.

A number of comments were directed toward either promoting or deterring the use of the term "concentration camp" or "internment camp" with respect to Manzanar. The choice of descriptive terminology is not a general management planning issue but rather an issue which may surface in the development of interpretive media. Terminology is imprecise, confusing, and emotionally-laden with respect to Manzanar. It is noted that while the area was officially designated as the Manzanar War Relocation Center, it has historically been widely referred to as an internment camp. Also, the use of the term "concentration camp" to describe the relocation centers was common in the WWII era not only in the public media but also in statements by prominent government officials. Consequently it may be expected that the entire range of terms will surface in the site's interpretive media. In the final analysis, the Park Service may find it necessary and illuminating to create an exhibit on terminology to explain the legal and popular uses of various terms, their application to the relocation program, and the emotional implications.

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National Park Service

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Eastern California Museum

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APPENDICES

1. Authorizing Legislation
2. List of Threatened, Endangered, and Candidate Species
3. Projects Requiring Additional Section 106 Compliance
4. Implementation Schedule and Cost Estimates
5. Proposed Treatment of Classified Structures
6. Air Quality Analysis
7. Public Comment Letters & NPS Responses

APPENDIX 1

PUBLIC LAW 102-248

MARCH 3, 1992

MANZANAR NATIONAL HISTORIC SITE

PUBLIC LAW 102-248 [H.R. 543]; March 3, 1992

MANZANAR NATIONAL HISTORIC SITE;
JAPANESE AMERICAN NATIONAL
HISTORIC LANDMARK THEME
STUDY ACT

An Act to establish the Manzanar National Historic Site in the State of California, and for other purposes.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

Minorities.

TITLE I—MANZANAR NATIONAL HISTORIC SITE

16 USC 461 note. SECTION 101. ESTABLISHMENT.

(a) IN GENERAL.—In order to provide for the protection and interpretation of the historical, cultural, and natural resources associated with the relocation of Japanese-Americans during World War II, there is hereby established the Manzanar National Historic Site in the State of California.

(b) AREA INCLUDED.—The site shall consist of approximately 500 acres of land as generally depicted on a map entitled "Map 3—Alternative Plans—Manzanar Internment Camp" numbered 80,002 and dated February 1989. Such map shall be on file and available for public inspection in the appropriate offices of the National Park Service, Department of the Interior. The Secretary may from time to time make minor revisions in the site boundaries.

16 USC 461 note. SEC. 102. DEFINITIONS.

As used in the title, the term—

(1) "Advisory Commission" means the Manzanar National Historic Site Advisory Commission established pursuant to section 105 of this title;

(2) "city" means the City of Los Angeles;

(3) "Secretary" means the Secretary of the Interior; and

(4) "site" means the Manzanar National Historic Site established pursuant to section 101 of this title.

16 USC 461 note. SEC. 103. ACQUISITION OF LAND.

(a) IN GENERAL.—(1) Subject to the limitations set forth in paragraphs (2) and (3) of this subsection, the Secretary is authorized to acquire lands or interests therein within the boundaries of the site of donation, purchase with donated or appropriated funds, or by exchange.

(2) Lands or interests therein located within the boundaries of the site which are owned by the State of California, or a political subdivision thereof, may be acquired only by donation or exchange.

(3) The Secretary shall not acquire lands or interests therein located within the boundaries of the site which are owned by the city of Los Angeles until such time as the Secretary has entered into an agreement with the city to provide water sufficient to fulfill the purposes of the site.

(b) MAINTENANCE FACILITY.—The Secretary is authorized to contribute up to \$1,100,000 in cash or services for the relocation or construction of a maintenance facility for Inyo County, California.

SEC. 104. ADMINISTRATION OF SITE.

(a) **IN GENERAL.**—(1) The Secretary shall administer the site in accordance with this title and with the provisions of law generally applicable to units of the National Park System, including the Act entitled "An Act to establish a National Park Service, and for other purposes", approved August 25, 1916 (39 Stat. 535; 16 U.S.C. 1, 2-4), and the Act of August 21, 1935 (49 Stat. 666; 16 U.S.C. 461-67).

(2) Nothing in this title shall create, expand, or diminish any authority of the Secretary over lands or activities of the City of Los Angeles outside the boundaries of the site.

(b) **DONATIONS.**—The Secretary may accept and expend donations of funds, property, or services from individuals, foundations, corporations, or public entities for the purpose of providing such services and facilities as the Secretary deems consistent with the purposes of this title.

(c) **GENERAL MANAGEMENT PLAN.**—Within 3 years after the date funds are made available for this subsection, the Secretary shall, in consultation with the Advisory Commission, prepare a general management plan for the site. Such plan shall be transmitted to the Committee on Energy and Natural Resources of the United States Senate and the Committee on Interior and Insular Affairs of the United States House of Representatives.

(d) **COOPERATIVE AGREEMENTS.**—The Secretary is authorized to enter into cooperative agreements with—

(1) public and private entities for management and interpretive programs within the site; and

(2) the State of California, or a political subdivision thereof, for the rendering, on a reimbursable basis, of rescue, fire fighting, and law enforcement services and cooperative assistance by nearby law enforcement and fire preventive agencies.

(e) **WATER.**—Except as provided in section 103(a)(3) of this title, nothing in this title shall affect the water rights of the city of Los Angeles.

(f) **TRANSPORT OF LIVESTOCK.**—Any person who holds a permit from the Department of Water and Power of the City of Los Angeles to graze livestock on city-owned lands contiguous with the site may move such livestock across those Federal lands administered by the Bureau of Land Management which are located contiguous with the site, for the purpose of transporting such livestock from one city-owned parcel to the other.

SEC. 105. ADVISORY COMMISSION.

(a) **ESTABLISHMENT.**—There is hereby established an 11-member advisory commission to be known as the Manzanar National Historic Site Advisory Commission. The members of the Advisory Commission shall be appointed by the Secretary, and shall include former internees of the Manzanar relocation camp, local residents, representatives of Native American groups, and members of the general public.

(b) **TERMS.**—Members of the Advisory Commission shall serve for a term of 2 years. Any member of the Advisory Commission appointed for a definitive term may serve after the expiration of his or her term, until such time as a successor is appointed.

(c) **CHAIRMAN.**—The members of the Advisory Commission shall designate one of the members as Chairman.

(d) **CONSULTATION.**—The Secretary, or the Secretary's designee, shall from time to time, but at least semi-annually, meet and consult with the Advisory Commission with respect to the development, management, and interpretation of the site, including the preparation of a general management plan as required by section 104(c) of this title.

(e) **MEETINGS.**—The Advisory Commission shall meet on a regular basis. Notice of meetings shall be published in local newspapers. Advisory Commission meetings shall be held at locations and in such a manner as to ensure adequate public involvement.

(f) **EXPENSES.**—Members of the Advisory Commission shall serve without compensation, but while engaged in official business shall be entitled to travel expenses, including per diem in lieu of subsistence in the same manner as persons employed intermittently in government service under section 5703 of title 5, United States Code.

(g) **CHARTER.**—The provisions of section 14(b) of the Federal Advisory Committee Act (86 Stat. 776) are hereby waived with respect to the Advisory Commission.

(h) **TERMINATION.**—The Advisory Commission shall terminate 10 years after the date of enactment of this title.

16 USC 461 note.

SEC. 108. AUTHORIZATION OF APPROPRIATIONS.

There are authorized to be appropriated such sums as may be necessary to carry out this title.

Japanese
American
National
Historic
Landmark
Theme Study
Act.

TITLE II—JAPANESE AMERICAN NATIONAL HISTORIC LANDMARK THEME STUDY

SEC. 201. SHORT TITLE.

This title may be cited as the "Japanese American National Historic Landmark Theme Study Act".

SEC. 202. THEME STUDY.

(a) **STUDY.**—The Secretary of the Interior (hereinafter in this title referred to as the "Secretary") is authorized and directed to prepare and transmit to the Congress no later than 2 years after the date funds are made available for this title a National Historic Landmark Theme Study on Japanese American history (hereinafter in this title referred to as the "Theme Study"). The purpose of the Theme Study shall be to identify the key sites in Japanese American history that illustrate the period in American history when personal justice was denied Japanese Americans. The Theme Study shall identify, evaluate, and nominate as national historic landmarks those sites, buildings, and structures that best illustrate or commemorate the period in American history from 1941 to 1946 when Japanese Americans were ordered to be detained, relocated, or excluded pursuant to Executive Order Number 9066, and other actions. The study shall include (but not be limited to) the following sites:

(1) Internment and temporary detention camps where Japanese Americans were relocated, detained, and excluded pursuant to Executive Order Number 9066, issued on February 19, 1942. The internment camps include: Tule Lake, California; Rohwer, Arkansas; Gila River, Arizona; Poston, Arizona; Granada, Colorado; Jerome, Arkansas; Heart Mountain, Wyoming; Minidoka, Idaho; and Topuz, Utah. The temporary detention camps include: Pomona, California; Santa Anita, California;

Fresno, California; Pinedale, California; Tanforan in San Bruno, California; Sacramento, California; Marysville, California; Mayer, Arizona; Salinas, California; Turlock, California; Merced, California; Stockton, California; Tulare, California; Puyallup, Washington; and Portland, Oregon.

(2) Angel Island, California, the port of entry for many Japanese Issei.

(3) Camp Shelby, Mississippi, the training ground for the 442nd Infantry Regimental Combat Team.

(4) Camp Savage and Fort Snelling, Minnesota, locations for the Military Intelligence Service Language School where Japanese Americans received Japanese language instruction, enabling the Japanese Americans to translate Japanese war plans into English.

(5) Camp McCoy, Wisconsin, where the 100th Infantry Battalion was trained.

(6) Terminal Island, California, the first location where Japanese Americans were forced to evacuate.

(7) Bainbridge Island, Washington, where Japanese Americans were evacuated pursuant to Exclusion Order Number 1.

(8) Immigration and Naturalization Service internment camps at Crystal City, Kennedy, and Seagoville, Texas, Missoula, Montana, and Bismarck, North Dakota.

(b) IDENTIFICATION AND LIST.—On the basis of the Theme Study, the Secretary shall identify possible new national historic landmarks appropriate to this theme and prepare a list in order of importance or merit of the most appropriate sites for national historic landmark designation.

SEC. 203. CONSULTATION.

In carrying out the study, the Secretary shall consult with Japanese American citizens groups, scholars of Japanese American history, and historic preservationists. In preparing the study, if the Secretary determines that it is necessary to have access to Indian lands, the Secretary shall request permission from the appropriate tribe.

SEC. 204. COOPERATIVE AGREEMENTS.

The Secretary may enter into cooperative agreements with one or more Japanese American citizens organizations knowledgeable of Japanese American history, especially the relocation and intern-

ment period during World War II, to prepare the Theme Study and ensure that the Theme Study meets current scholarly standards.

SEC. 206. AUTHORIZATION OF APPROPRIATIONS.

There is hereby authorized to be appropriated such sums as are necessary to carry out this title.

Approved March 3, 1992.

LEGISLATIVE HISTORY—H.R. 543:

HOUSE REPORTS: No. 102-125 (Comm. on Interior and Insular Affairs).
SENATE REPORTS: No. 102-236 (Comm. on Energy and Natural Resources).
CONGRESSIONAL RECORD:

Vol. 107 (1991): June 24, considered and passed House.

Nov. 26, considered and passed Senate, amended.

Vol. 108 (1992): Feb. 18, 19, House considered and concurred in Senate amendments.

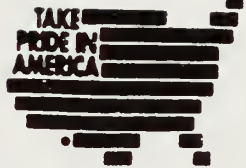
APPENDIX 2

SPECIES LIST

THREATENED AND ENDANGERED SPECIES CONSULTATION



United States Department of the Interior



FISH AND WILDLIFE SERVICE
ECOLOGICAL SERVICES
Ventura Field Office
2140 Eastman Avenue, Suite 100
Ventura, California 93003

February 22, 1993

Memorandum

To: Associate Regional Director, Resources Management and Planning,
National Park Service, Western Region, San Francisco, California

From: Acting Field Supervisor, US Fish and Wildlife Service, Ventura Field
Office, Ventura, California

Subject: Species List for Manzanar National Historic Site, Inyo County,
California

This is in response to your letter, dated January 29, 1993 and received by us on February 8, 1993 requesting information on listed and proposed endangered and threatened species which may be present near the recently established Manzanar National Historic Site in Inyo County, California.

The attached list of species fulfills the requirements of the Service under Section 7(c) of the Endangered Species Act of 1973, as amended (Act). If the subject project may affect a listed species, your agency has the responsibility to prepare a Biological Assessment if the project is a construction project which may require an Environmental Impact Statement. If a Biological Assessment is not required, your agency still has the responsibility to review its proposed activities and determine whether the listed species will be affected.

During the assessment or review process, your agency may engage in planning efforts, but may not make any irreversible commitment of resources. Such a commitment could constitute a violation of Section 7(d) of the Endangered Species Act. If a listed species may be affected, your agency should request, in writing through our office, formal consultation pursuant to Section 7 of the Act. Informal consultation may be used to exchange information and resolve conflicts with respect to listed species prior to a written request for formal consultation.

I have enclosed a list of endangered and threatened species and candidate species presently under review by the Service for consideration for Federal listing. Only listed species receive protection under the Act. However, candidate species should be considered in the planning process in the event they become listed or proposed for listing prior to project completion. Preparation of a biological assessment, as described in Section 7(c) of the Act, is not required. Candidate species are included for the sole purpose of notifying Federal agencies in advance of possible proposals and listings which at some time in the future may have to be considered in planning Federal activities. If early evaluation of the project indicates that it is likely to adversely affect a candidate species,

you may wish to request technical assistance from this office.

Should you have any questions regarding the species listed, or your responsibilities under the Act, please contact Ms. Cat Brown of my staff at (805) 644-1766.

Enclosure

A handwritten signature in dark ink, appearing to read "C. Brown", is written over the word "Enclosure".

"Construction Project" means any major Federal action which significantly affects the quality of the human environment designed primarily to result in the building or erection of man-made structures such as dams, buildings, roads, pipelines, channels and the like. This includes Federal actions such as permits, grants, licenses, or other forms of Federal authorizations or approval which may result in construction.

LISTED AND CANDIDATE ENDANGERED AND THREATENED SPECIES
THAT MAY OCCUR IN THE VICINITY OF
MANZANAR NATIONAL HISTORIC SITE, INYO COUNTY, CALIFORNIA

Listed Species

<u>Fish</u>		
Owens tui chub	<i>Gila bicolor snyderi</i>	(E)
Owens pupfish	<i>Cyprinodon radiosus</i>	(E)
<u>Birds</u>		
Least Bell's vireo	<i>Vireo bellii pusillus</i>	(E)

Candidate Species

<u>Fish</u>		
Owens speckled dace	<i>Rhinichthys osculus</i> ssp.	(2)
<u>Birds</u>		
Southwestern willow flycatcher	<i>Empidonax traillii extimus</i>	(1)
<u>Mammals</u>		
Owens valley vole	<i>Microtus californicus vallicola</i>	(2)
California bighorn sheep	<i>Ovis canadensis californiana</i>	(2)
<u>Plants</u>		
Owens Valley checkermallow	<i>Sidalcea covillei</i>	(2)
Inyo County mariposa lily	<i>Calochortus excavatus</i>	(2)
Mono buckwheat	<i>Eriogonum ampullaceum</i>	(2)

(E)-Endangered (T)-Threatened

(1)-Category 1: Taxa for which the Fish and Wildlife Service has sufficient biological information to support a proposal to list as endangered or threatened.

(2)-Category 2: Taxa which existing information indicates may warrant listing, but for which substantial biological information to support a proposed rule is lacking.

APPENDIX 3

LIST OF PROPOSED MANZANAR PROJECTS

REQUIRING ADDITIONAL SECTION 106 COMPLIANCE

In reviewing the draft General Management Plan, the State Historic Preservation Officer indicated the need for OHP review of any plans for removal and relocation of the State Historic Marker from its current location. The plan also makes commitments for further Section 106 compliance on other actions including restoration and adaptive use of the auditorium as an interpretive center and water resources management planning.

APPENDIX 4

IMPLEMENTATION SCHEDULE AND COST ESTIMATES MANZANAR NATIONAL HISTORIC SITE

GENERAL MANAGEMENT PLAN

General Considerations

The development costs presented below are based on the application of unit costs to development concepts in the alternative plans, and rely in large part on DSC's Class C estimating guide. They are not sufficiently accurate for use in budget formulation or justification.

Cost estimates are necessarily incomplete at this point in the planning process. The general management plan provides general direction for the unit, indicating appropriate functions and scales, but defers most of the design decisions into the future when additional guiding analyses have been completed. Design decisions provide the basis for realistic cost estimates.

Major cost items not estimated at this point include:

1. Interpretive Center- The plan calls for the rehabilitation and adaptive use of the historic auditorium as an interpretive center. Rehabilitation requirements and adaptive use improvements have not been determined at this point. A detailed analysis of the historic configuration, level of integrity of existing structure components, and potential for adaptive use will be undertaken in the future and will provide the basis for restoration, preservation, and adaptive use modifications designed to accommodate exhibits, restrooms, administrative offices, and other interpretive center functions. It is anticipated that major expenditures will be incurred in assuring the fire safety of the structure and in providing for adequate heating, ventilating, and cooling. It is also likely that the structure's south wing would be restored for adaptive use.

2. Interpretive Media- The plan calls for the development of a wide range of interpretive media both in the interpretive center and at numerous waysides located around the camp. In addition to more conventional materials, consideration will be given to the use of interactive media. The costs of media cannot be estimated at this point. Estimates will be made following the completion of interpretive planning for the site.

3. Reconstruction/relocation of historic structures- This is called for in the proposed plan. There is no reliable basis for estimating these costs. Because there are no known remaining watchtowers, this structure will need to be reconstructed. Based on material components and construction

methods, the cost would appear to be modest, i.e. a few thousand dollars. The cost of the display barracks will vary depending on whether it is a relocated historic structure (the preferred choice) or a reconstructed replica. Costs of a relocated structure will depend on the purchase price, costs for moving it to the site, and costs for rehabilitation. If the barracks is reconstructed, construction materials appear to be common and construction methods quite simple, so costs should be modest.

4. Funding for Eastern California Museum Curation Facility- This action is called for in the proposed plan. While the concept is clear, the scale and overall approach to be followed would need to be negotiated between the park and the museum. Legislation would likely be required to allow NPS to fund such a facility.

A number of additional, less significant actions, e.g. relating to implementation of a water resource management plan and vegetation management plan, will be scoped and estimated following completion of those plans. At this point it is impossible to estimate the related costs. Most of the actions would be expected to be small scale, with maximum use of park staff, volunteers, and locally contracted labor.

DEVELOPMENT COSTS AND PHASING

PROPOSED PLAN AND ALTERNATIVE B

DEVELOPMENT ITEM	GROSS CONSTRUCTION COST	CONSTRUCTION PLANNING COST	TOTAL COST
WATER SYSTEM (AUDITORIUM)	\$ 325,000	\$ 65,000	\$ 390,000
SEWER SYSTEM (ENLARGE)	\$ 130,000	\$ 25,000	\$ 155,000
ENTRANCE ROAD (2-LANE PAVED)	\$ 190,000	\$ 35,000	\$ 225,000
PERIMETER ROAD (1-LANE)	\$ 480,000	\$ 90,000	\$ 570,000
PARKING LOTS- AUDITORIUM (90 CARS/2 BUS) CAMP AREA (4 @ 20 EACH)	\$ 185,000 \$ 90,000	\$ 35,000 \$ 15,000	\$ 220,000 \$ 105,000
SITE FENCING	\$ 260,000	\$ 50,000	\$ 310,000
IRRIGATION SYSTEM (ORCHARD)	\$ 25,000	\$ 5,000	\$ 30,000
COMFORT STATION (CEMETERY)	\$ 130,000	\$ 25,000	\$ 155,000
TOTAL COSTS	\$ 1,815,000	\$ 345,000	\$ 2,160,000

APPENDIX 5

PROPOSED TREATMENT CLASSIFIED STRUCTURES MANZANAR NATIONAL HISTORIC SITE

STRUCTURE NUMBER	STRUCTURE NAME	TREATMENT
HS-01	Auditorium	Restoration/Adaptive Use
HS-02	Sentry House	Restoration
HS-03	Police Post	Restoration
HS-04	Main Entrance Gateway	Restoration
HS-05	Main Entrance Sign Posts	Restoration
HS-06	NHL Plaque Monument	Preservation
HS-07	Stone Planters	Preservation
HS-10	Stone Traffic Circle	Preservation
HS-11	U-Shaped Masonry Structure	Preservation
HS-12	Stone Masonry, Administration Area	Preservation
HS-13	Patio Walls, Camp Director's Residence	Preservation
HS-14	Patio Wall, Caucasian Recreation Club	Preservation
HS-15	Garden- Block 9	Preservation/Possible Restoration
HS-16	Garden- Block 22	Preservation/Possible Restoration
HS-17	Garden- Block 34	Preservation/Possible Restoration

STRUCTURE NUMBER	STRUCTURE NAME	TREATMENT
HS-18	Cemetery Monument	Preservation
HS-19	Hospital Garden	Preservation/Possible Restoration
HS-20	Hospital Complex Steps	Preservation
HS-21	Merritt Park	Preservation/Possible Restoration
HS-22	North Park Barbecues	Preservation
HS-24	Picnic Area Barbecue	Preservation
HS-25	North Park Road	Preservation
HS-26	Chicken Ranch Boiler	Preservation
HS-27	Chicken Ranch Retaining Walls	Preservation
HS-28	Concrete Steps	Preservation
HS-29	Stone-Lined Sidewalks	Preservation
HS-30	Main Entry Parking Area	Restoration

APPENDIX 6

AIR QUALITY ANALYSIS

Geographic Setting

Manzanar National Historic Site is located within the Owens Valley PM-10 Planning Area of the Great Basin Unified Air Pollution Control District. The Owens Valley Planning Area is located in eastern California in central Inyo County. The crest of the Sierra Nevada Mountain Range defines the western edge of the area. The eastern boundary runs along the crest of the Inyo Mountain Range. The northern boundary crosses the Owens Valley at Tinemaha Reservoir. The southern boundary crosses Owens Valley at Haiwee Reservoir heading into the Coso Mountain Range to Coso Peak. The Planning Area lies within the deepest valley in the country. The lowest elevation, 3,552 feet occurs at Owens Lake and the highest elevation, 14,494 feet occurs at Mount Whitney peak.

The area is rural in nature and includes no incorporated cities, but does include the unincorporated communities of Independence, Lone Pine, Dolomite, Keeler, Cartago and Olancha. The permanent population within the planning area is approximately 3,400 people. Nearly the entire Planning Area is in public lands under the jurisdiction of the Bureau of Land Management, the U. S. Forest Service, the National Park Service, the U. S. Department of Defense, the California State Lands Commission, the County of Inyo and the City of Los Angeles.

Climate and Meteorology

Due to the large elevational differences within the Owens Lake Planning Area, the climate ranges from a high desert type on the floor of the Valley to an Alpine type along the crest of the Sierra and Inyo Mountains. For air quality purposes only the Valley floor climate will be discussed since both the air pollution sources and the permanent population reside there.

The Owens Valley is well protected from ocean air masses by the Sierra crest and thus experiences a predominantly high desert type climate. High desert climates are characterized by warm to hot summers, moderate winters, large daily and seasonal ranges in temperature and low humidity. Daily temperature ranges are often about 40 degrees F between the high and the low. Summer high temperatures often exceed 100 degrees F, followed by evenings in the mid-60's to low 70's. Winter temperatures are moderate and on average rise above freezing about 10 days per year. Most of the area's precipitation falls as a mix of rain and snow during the months from December through March. Average precipitation totals about 4 inches per year. Humidity is low throughout the year and sunshine is abundant year round.

Large scale movement of air masses over Great Basin and the extreme topography of Owens Valley govern the direction, intensity and duration of surface winds. The north to south orientation of the 10,000 foot deep valley causes the majority of surface winds to flow up valley, south-southeast, or down valley, north-northeast. Winds are relatively constant throughout the year, typically averaging 7-9 miles per hour each month. Sand storms over Owens Lake require wind velocities greater than 18 mph at 10 meters above lake bed. Winds speeds greater than 10 mph occur less than 10 percent of the time in winter months (November through February), 20 percent in the spring (March through June), 5 percent in

the summer (July through August) and fall winds mimic late summer and early winter patterns. Peak annual gust (approximately five seconds in duration) is 65 to 75 mph.

Regulatory Overview and Existing Air Quality Condition

National Ambient Air Quality Standards

The Federal Clean Air Act (CAA), as amended in 1990, requires the U.S. Environmental Protection Agency (EPA) to identify national ambient air quality standards (NAAQS) to protect public health and welfare. NAAQS have been set for six pollutants: particulate matter less than 10 microns (PM_{10}), carbon monoxide (CO), nitrogen oxides (NO_x), sulfur dioxide (SO_2), ozone (O_3), and lead (Pb). These pollutants are called "criteria" pollutants because the standards satisfy criteria specified in the CAA. NAAQS are identified in Table 1. An area where a NAAQS is exceeded more than three times in three years can be considered a "non-attainment area" subject to planning and pollution control requirements that are more stringent than areas which meet the NAAQS.

Table 1: Ambient Air Quality Standards, National and California State

ppm = parts per million

$\mu g/m^3$ = micrograms per cubic meter

Pollutant	Averaging Time	California Standards Concentration	National Standards Concentration
Ozone	1 hour	0.09 ppm	0.12 ppm
Carbon Monoxide	8 hours 1 hour	9.0 ppm 20.0 ppm	9.0 ppm 35 ppm
Nitrogen Oxide	Annual Average 1 hour	— 0.25 ppm	0.053 ppm —
Sulfur Dioxide	Annual Average 24 hours 3 hours 1 hour	— 0.04 ppm ($105\mu g/m^3$) — 0.25 ppm	$80\mu g/m^3$ (0.03 ppm) $365\mu g/m^3$ (0.14 ppm) $1300\mu g/m^3$ (0.5 ppm) —
Suspended Particulate Matter (10 Micron)	Annual Geometric Mean 24 hours Annual Arithmetic Mean	$30\mu g/m^3$ $50\mu g/m^3$	— $150\mu g/m^3$ $50\mu g/m^3$
Sulfates	24 hours	$25\mu g/m^3$	—
Lead	30 days Calendar Quarter	$1.5\mu g/m^3$	$1.5\mu g/m^3$

Source: Derived from *Area Designations for State and Ambient Air Quality Standards*, September 1993, California Air Resources Board.

Owens Valley Planning area meets all federal criteria pollutant standards except Particulate Matter less than 10 microns (PM_{10}), for which the county is classified as serious non-attainment. The PM_{10} concentrations near Owens Lake are among the highest in the country. Concentrations of more than 10 times the federal standard ($150\mu g/m^3$) have been measured in the community of Keeler on the east shore of the lake ($1,861\mu g/m^3$ on 2/3/89).

State Ambient Air Quality Standards

The State of California Air Resources Board (CARB) has set ambient air quality standards to

protect public health and welfare which are more strict than the NAAQS. State standards are also identified in Table 1. Under the 1988 California Clean Air Act (patterned after the federal CAA), air basins were designated as attainment, non-attainment, or unclassified for the State standards. The Owens Valley Planning Area meets all State pollutant standards except PM₁₀. Table 2 shows the California and federal air quality standards for PM₁₀ and the maximum levels recorded in the Owens Valley Planning Area between 1989 and 1993.

Table 2: California and Federal Air Quality Standards for PM₁₀ and Maximum concentrations at Keeler 1988-1993.

Federal PM ₁₀ Standard (ug/m ³)	State PM ₁₀ Standard (ug/m ³)	Year	Maximum 24 Hour Average (ug/m ³)	Annual Average (ug/m ³)
24 hour 150	50	1988	394	33.4
Annual 50	30	1989	1861	78.1
		1990	858	54.5
		1991	327	*
		1992	526	37.4
		1993	781	31.1

*data considered invalid if < 12 samples per quarter

Source: Derived from *Owens Valley Planning Area Best Available Control Measures State Implementation Plan*, June 1994. Great Basin Unified Air Pollution Control District

State Implementation Plan

The Great Basin Unified Air Pollution Control District has been delegated authority by CARB to develop the State Implementation Plan (SIP) for federal non-attainment pollutants in Owens Valley. The Owens Valley PM₁₀ Planning Area Best Available Control Measures State Implementation Plan (SIP) defines control measures which are designed to bring the area into attainment. The Plan was adopted by the Board in the summer of 1994.

Basic components of a SIP include: legal authority, an emissions inventory, air quality monitoring network, control strategy demonstration modeling, rules and emission limiting regulations, new source review provisions, enforcement and surveillance, and other programs as necessary to attain standards. Emission sources are broken into four main categories, stationary, off-road mobile, on-road mobile and biogenic. Table 3 lists pertinent Owens Valley PM₁₀ rules and regulations with respect to Manzanar NHS.

Table 3: Owens Valley Planning Area Pertinent PM₁₀ Rules and Regulations.

Rule Number	Description
Senate Bill 270 (Health & Safety Code 42316)	Relates to water diversion by City of LA
District Rule 209-A	Standards for Authorities to Construct
District Rule 400	Relates to Visible Air Emissions, Opacity
District Rule 401	Fugitive Dust
District Rule 405	Exempts certain activities from Rule 405
Proposed Rule 432	Owens lake Dust Control

Conformity

In 1993 EPA adopted regulations implementing section 176 of the Clean Air Act as amended. Section 176 requires that Federal actions conform to applicable state implementation plans for

achieving and maintaining the NAAQS. Federal actions must not: cause or contribute to new violations of any standard, increase the frequency or severity of any existing violation, interfere with timely attainment or maintenance of any standard, delay emission reduction milestones, or contradict SIP requirements. Currently the Conformity rule applies only in non-attainment areas.

The National Park Service must show that the proposed activities associated with the Manzanar National Historic Site General Management Plan and Environmental Impact Statement meet or are exempt from general conformity requirements. Projects are exempt if predicted pollutant levels fall below “de minimis” values as reported in 40 CFR, subpart B, subsection 93.153.

Other Air Quality Issues

Visibility

Visibility refers to the clarity of the atmosphere and is typically measured as the distance one can see at a particular location and time. The absorption and scattering of light by both gases and particles in the atmosphere restricts visibility. Natural factors which contribute to decreased visibility include fog, precipitation, blowing dust and snow, and relative humidities above 70 percent. Human activities that reduce visibility include the combustion of fossil fuels whose emissions transform in the atmosphere into tiny visibility reducing particles termed “aerosols. California has a standard for visibility reducing particles, aerosols. Great Basin Unified Air Pollution Control District (GBUAPCD) is un-classified with respect to the State visibility standard.

One of the outstanding features of the Manzanar site are the magnificent clear distant views of the 14,000 foot peaks of the Sierra Crest to the west and the Inyo Mountain crest to the east. The National Park Service is responsible for protecting visibility and related air quality values in our Class I and Class II parks and wildernesses. Sequoia and Kings Canyon National Parks, two Class I airsheds, lie just over the Sierra crest from Manzanar, and Death Valley National Park, a Class II airshed, lies to the east approximately 20 miles. The NPS routinely works in cooperation with GBUAPCD reviewing air pollution permits and in educating industry and the public on actions to reduce air pollution and its impacts on public lands.

Health and Welfare Effects

Studies indicate that heavy exposure to desert dust may be harmful to human health. A syndrome referred to as “desert lung syndrome” has been described in the literature. The syndrome is characterized by deposits of sandy dust in the lungs, which may be associated with changes in lung function. Table 4 lists the human health effects associated with all six criteria pollutants.

Table 4: Human health effects of Criteria pollutants.

Pollutant	Chronic Exposure Effects	Acute Exposure Effects
Ozone - O ₃	irreversible reduction in lung capacity, lowers stamina, more vulnerable to long term respiratory problems, changes to immune system, children, elderly and those who suffer from heart or lung disease are most susceptible	adds stress to body in general, strong irritant, may restrict airways causing more stress on the respiratory system, coughing, chest pains, headaches, nausea, asthma attacks, eye and throat irritation
Carbon Monoxide - CO	restricts blood's ability to carry oxygen to the brain and other body tissues, aggravates heart and lung disease, impairs central nervous system, fatigue and decrease in physical and mental performance	causes dizziness, nausea, headaches and fatigue, reflexes are slowed, judgement and visual perception are impaired, extremely subtle and dangerous
Nitrogen Oxide NO _x	damages cell linings in the respiratory tract and increases susceptibility to infection, irritates lungs and causes bronchitis and pneumonia	airway narrowing, cell membrane damage, fluid leakage, contributes to bronchitis and pneumonia
Particulate Matter - PM ₁₀	7 year national study shows a 17 percent increase in deaths from respiratory and heart disease in polluted cities compared to clean cities. An estimated 60,000 people die prematurely in the United States each year from particulate air pollution	aggravates existing respiratory disease and damages lung tissue, alters defense system
Sulfur Dioxide - SO ₂	causes respiratory illness, alters lung defenses, affects breathing	aggravates existing respiratory and cardiovascular disease
Lead-Pb	readily absorbed into the bloodstream and attacks central nervous system, children are especially vulnerable	adversely affects mental development and performance, kidneys, liver, blood forming organs, the nervous system and blood pressure

ENVIRONMENTAL CONSEQUENCES

Emissions Inventory

Air pollution emissions have been estimated from all sources associated with the Manzanar NHS GMP/EIS. The combined project emissions yield a very small "minor" source of air pollution. The emissions data illustrate activities associated with this project generate air pollution emissions well below the "de minimis" values defined by the Conformity Rule. The Manzanar NHS GMP/EIS is exempt from further Conformity analysis. This project will not cause or contribute to any new violations of any air quality standard and it meets all applicable SIP requirements.

Table 5 summarizes total emissions from all sources for the proposed plan and Alternative B. Alternative A is the No Action alternative. The proposed plan provides for enhanced visitor experiences including conversion of the historic camp auditorium to an interpretive center, the creation of a network of wayside exhibits, the reconstruction of a limited number of representative structures, rehabilitation of the camp road gridwork system, thinning and clearing of dense tree growth, reconstruction of the camp's perimeter fence, and development of a shuttle bus system to be operated during heavy visitor use periods. Alternative B provides minimal improvements to visitor services with some selective thinning of natural vegetation, no reconstruction and no shuttle bus service.

Table 5: Summary of Total Project Emissions all Sources.

Tons Per Year	Alternative	PM ₁₀	HC	CO	NO _x
Fugitive PM ₁₀ Emissions from Paved and Unpaved Roads	B	10.30 ¹			
	GMP	8.18 ²			
Fugitive PM ₁₀ from Compound Area	B	0.16 ¹			
	GMP	0.16 ¹			
Motor Vehicle Emissions	B		0.2	1.9	0.2
	GMP		0.1	1.7	0.2
TOTALS	B	10.46	0.2	1.9	0.2
	GMP	8.34	0.1	1.7	0.2
De Minimis Values		100	50	100	50

¹ Estimates represent 50% PM₁₀ emissions control on un-paved roads and compound area using chemical palliatives.

² Current EPA model does not calculate PM₁₀ emissions for vehicles.

To estimate motor vehicle emissions, the most current version of the EPA motor vehicle emissions model was used. Assumptions used in calculating air pollution emissions are

provided in Table 6 below.

Table 6: Emissions Calculations Assumptions

Assumptions
270,000 new visitors by the year 2010 (currently there are 20,000 visitors per year)
2.7 occupants per vehicle (100,000 new vehicles per year)
Highest day visitation is 1100 people per day (407 vehicles per day)
Distance to Interpretive Center is .4 miles (.8 miles round trip) on paved road
50% of visitors continue past Interpretive Center, traveling 2.5 miles on unpaved road
Average speed is 10 miles per hour
For preferred Option C, 25% of visitors use 14 person, gasoline fuelled shuttle van
1 acre of disturbed land in compound area
Chemical palliative used on unpaved road and compound area, for 50% control of fugitive emissions
Reconstruction will not require dirt moving since building foundations already exist

Cumulative Air Quality Impacts

Most visitor use at Manzanar is expected to be from existing traffic loads, i.e. probably greater than 75% of visitors will have other primary destinations somewhere in or beyond Owens Valley. It is expected that visitors will make a brief stop at Manzanar and then continue on to ski areas, Crowley Lake, Death Valley National Park, or Nevada Gambling centers. Emissions from these vehicles should be accounted for in local area planning.

APPENDIX 7

PUBLIC COMMENTS AND NPS RESPONSES

The following letters surface the complete range of substantive issues raised during public review of the draft General Management Plan and Environmental Impact Statement, including oral statements at the four public meetings. Numerous additional letters were received, but repeated the same issues considered.

Copies of all written statements, as well as tapes of oral comments received at the public review meetings regarding the plan, are available for inspection at the office of the superintendent of Manzanar National Historic Site.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

April 8, 1996

Stanley T. Albright
Regional Director
Western Regional Office
National Park Service
600 Harrison St., Suite 600
San Francisco, CA 94107-1375

Dear Mr. Albright:

The Environmental Protection Agency (EPA) has reviewed the **Draft General Management Plan & Environmental Impact Statement** (DEIS) for the **Manzanar National Historic Site**, Inyo County, California. We are submitting the following comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations implementing NEPA (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

In proposing the management plan, the National Park Service (NPS) examined three alternatives, including a "no action". The alternatives address management policies for natural, historic, and cultural resources, and plans for visitor use facilities, and interpretive sites. All alternatives, except the "no action," would entail upgrades of the road/trail systems and construction of additional interpretive sites and visitor structures. The preferred alternative describes a program of preservation of the natural resources and expanded visitor uses.

We are seriously concerned with several aspects of the DEIS. Namely that there is no discussion in the DEIS regarding the associated air impacts in keeping with the Clean Air Act and General Conformity regulations and that the NPS has not performed a survey of the wetlands areas nor have they completely addressed erosion impacts and potential stormwater runoff from the proposed development in keeping with the requirements of the National Pollution Discharge Elimination System. While the impacts associated with these issues may prove to be substantively insignificant, they should nevertheless be addressed and evaluated in the document.

We believe that more detailed information should be included in the Final EIS, such as guidelines and procedures regarding; erosion control, waste water treatment, air quality, threatened and endangered species, road/trail management, land use inside and outside the Monument, and the related specific mitigation measures. This information could then be utilized as a baseline

reference for subsequent NEPA documents. Having this framework in the Final EIS will help other planning agencies, such as the county, tribal council, and the interested public understand the basis for later NEPA documents and will help identify what should be addressed in any future cooperative agreements between agencies. Our review comments, which are attached, discuss these concerns in greater detail.

We have assigned a rating of EC-2 (Environmental Concerns -- Insufficient Information; see attached rating sheet) to the DEIS. To ensure that the public and agencies have adequate time to fully review the additional information which should be provided in the Final EIS, we recommend that the NPS establish a 60 day review period for the Final EIS.

We appreciate the opportunity to review your DEIS. Please send two copies of the Final EIS to this office when the document is officially submitted to EPA Headquarters. If you have any questions, please call me at 415-744-1584, or contact David J. Carlson at 415-744-1577.

Yours truly,

A handwritten signature in dark ink, appearing to read "David Farrel", with a horizontal line extending to the right.

David Farrel, Chief
Office of Federal Activities

Attachments (2)

#001925.manzan.dei

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION

Environmental Impact of the Action

LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of environmental quality, public health or welfare. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommend for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1-Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From: EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

General NEPA comments

The DEIS does not mention whether or not specific design and management issues which are not covered in this document will be addressed in future detailed plans and studies. A programmatic-level EIS, such as a General Management Plan, should provide a framework for more detailed plans and studies including mitigation measures to minimize the impacts from the implementation of the various parts of the project. We are very concerned by statements in the DEIS that no wetlands survey has been performed, nor has there been a hazardous waste survey. We are also very concerned that the DEIS indicates that additional environmental compliance would be required to complete and implement this plan without providing further information on the type of environmental compliance that may be necessary. The DEIS is significantly lacking in its level of detail to allow the readers and the decision maker to adequately determine the environmental impacts from the implementation of the proposed alternative.

The DEIS does not contain an informative discussion of the current conditions of the park and the surrounding area. The FEIS should discuss in much greater detail the current conditions at the site, the direct and indirect impacts resulting from the implementation of the project and the measures that will be employed to mitigate those impacts. The NPS should refer to the CEQ regulations implementing NEPA, 40 CFR 1500-1508, specifically sections 1502.14, 1502.16, and 1508.20, regarding environmental consequences and mitigation.

We suggest that the FEIS discuss any foreseeable changes (in existing site design and location plans), which could either affect the priorities identified in the DEIS or introduce significant new resource management issues. The FEIS should explain how the NPS will monitor impacts from these projects to ensure consistent management techniques are applied throughout the site.

The FEIS should identify spatially or temporally related projects and should address cumulative and indirect impacts, including all potential impacts that may be out of the control of the NPS (40 C.F.R. 1508.7 and 1508.8).

Carrying capacity

The DEIS indicates that the Historic Site's carrying capacity has not been determined. We recommend that the NPS

attempt to collect data on the physical carrying capacity of the site and provide that information in the FEIS. The data should be summarized in a table indicating the carrying capacity of particular areas compared to the actual and projected numbers of persons visiting those areas. This information will provide a snapshot of the current conditions of the Monument and the areas that are experiencing overutilization and enable the decision maker to determine if the proposed alternative is sufficient to support the expected visitation to the area. It will also give the public and other agencies a better understanding of the rationale for improvements to certain areas.

2.

Air Quality

The FEIS should be written so that the project's relevance to air quality issues is clear. The description of the project alternatives should include sufficient detail to allow an identification of potential air quality impacts. This discussion should allow the reader of the EIS to distinguish between project-related impacts and impacts due to nonproject background conditions.

The FEIS should discuss any existing air pollution problems in the area, especially problems that may worsen as a result of the proposed project. To provide this understanding, the section should identify the air basin in which the project lies, and the climate, topography, and meteorological conditions as they affect basin air quality. The FEIS should acknowledge that the project is located in a nonattainment area for PM10. The FEIS should describe the area's criteria pollutant attainment/nonattainment status and the severity of any nonattainment problems. The number and frequency of monitored criteria pollutant violations during the most recent 5 years of record should be presented for air quality monitors located near the proposed project site.

3

Health and welfare effects of criteria pollutants should be summarized (especially for nonattainment area pollutants and pollutants likely to be emitted in substantial quantities by the project). Nearby sensitive areas meriting special protection also should be identified (Class I wilderness areas and national parks). Finally, sensitive receptors in the project vicinity (e.g., residences, nursing homes, schools, hospitals, and daycare facilities) should be identified.

The FEIS, affected environment section should contain emission inventories for stationary, area, and mobile criteria pollutant sources. The FEIS should summarize the existing air

quality regulatory environment and the status of air quality planning, including the status of existing and proposed air quality plans. Air quality rules and regulations affecting the project should be summarized along with the roles and responsibilities of each regulatory agency.

The FEIS should include the evaluation criteria that will be used to identify what constitutes a significant air quality impact. The criteria should also specify when dispersion modeling should be conducted. These criteria should be based on ambient air quality standards, existing rules and regulations, and/or other well-reasoned criteria. The methodology for performing the air quality analysis must identify the years to be included in the analysis and the models and assumptions used to evaluate whether the project would have a significant air quality impact. If the project is subject to EPA's general conformity rule, then an analysis must be conducted for each of the years specified by the conformity rule (40 CFR 93 Subpart B).

If the project is located close to areas meriting special protection, such as national parks or wilderness areas, the methodology should identify how pollutant impacts on those areas will be evaluated.

The FEIS should include estimates of all project-related criteria pollutant emissions, including both construction and operational emissions. If the project has the potential to emit hazardous air pollutants, estimates of those pollutants should also be included. Emissions should be estimated using the latest emission factors available. If the project is subject to EPA's general conformity rule, then procedures outlined in 40 CFR 93.159 of that rule should be used to estimate emissions. Planning assumptions used to estimate air pollutant impacts should be derived from the most recent estimates of population, employment, travel, and congestion.

In addition to evaluating the direct impacts of traffic flows on the proposed project or project alternatives, the impact assessment should evaluate any redistribution of traffic flows that would result from the project. In particular, the assessment should evaluate the impacts on sensitive receptors resulting from increases in traffic flows on roads in the vicinity of the project.

CO Modeling

To estimate motor vehicle criteria pollutant emissions, the most current version of the motor vehicle emissions model specified by EPA and available for use in the preparation or revision of the state implementation plan (SIP) must be used in the conformity analysis as described in 40 CFR 93.159(b)(1). These emission estimates should be based on and consistent with the traffic study assumptions and results for the project. We recommend that the NPS continue their coordination with CALTRANS on the US 395 improvements.

Ambient carbon monoxide (CO) concentrations from mobile sources should be estimated if the project is shown to cause or contribute to significant traffic congestion in the project vicinity. CO modeling is required if existing intersections affected by the project are operating at a level of service (LOS) of D, E, or F or if intersection LOS would be degraded to D, E, or F because of the project. The CO modeling analysis should focus on congested intersections and those intersections that are expected to be most adversely affected by the proposed project and the project alternatives. As part of this analysis the entrance to Manzanar from US 395 should be examined as well as parking lots. 3

The air quality modeling analyses of CO concentrations should be based on EPA's Guideline for Modeling Carbon Monoxide from Roadway Intersections. All assumptions used to conduct the modeling should be described, and any deviations from EPA's modeling guidance should be identified, along with the reasons for those deviations.

PM10 Modeling

Estimates of ambient inhalable particulate (PM10) concentrations attributable to mobile sources will not be required until EPA releases modeling guidance on this subject. The project applicant should be aware that PM10 modeling may be required and should contact either Scott Bohning at (415)744-1293, or David Carlson at (415)744-1577 from EPA for the PM10 modeling guidance release date.

Stationary and Area Source Emission Estimates

To estimate non-motor-vehicle emissions (which include both stationary and area sources), the latest emission factors specified in EPA's Compilation of Air Pollutant Emission Factors (AP-42) should be used unless more accurate emission factors are

available (such as actual stack test data from stationary sources). Emission estimates should be based on a realistic estimate of worst-case operating conditions.

If criteria pollutant emissions from stationary and/or area sources exceed the significance thresholds established for the project, then dispersion modeling should be conducted. Air quality modeling of stationary and/or area source criteria pollutant emissions should be based on the applicable air quality models, databases, and other requirements specified in the most recent version of the Guideline on Air Quality Models (Revised) of 1986, including supplements (EPA pub. no. 450/2-78-027R).

Cumulative Impacts

The EIS should address cumulative air quality impacts, including direct and indirect emissions associated with the project plus emissions associated with other future development. Future scenarios should be carefully specified using the most recent estimates of population, employment, travel, and congestion approved by the relevant Planning Agency. An analysis of the cumulative impacts from the project and improvements to US 395 would be appropriate.

GENERAL CONFORMITY

EPA has developed conformity rules to implement Section 176(c) of the Clean Air Act Amendments of 1990 (CAAA). These rules are to ensure that federal actions conform to the appropriate SIP. The general conformity rules establish the criteria and procedures governing the determination of conformity for all federal actions, except federal highway and transit actions (40 CFR 93 Subpart B - Determining Conformity of General Federal Actions to State or Federal Implementation Plans).

Pursuant to the requirements of Section 176(c) of the Clean Air Act, 42 USC Section 7506(c), federal agencies are prohibited from engaging in or supporting in any way an action or activity that does not conform to an applicable SIP. Conformity to an implementation plan means conformity to an implementation plan's purpose of eliminating or reducing the severity and number of violations of the national ambient air quality standards and achieving expeditious attainment of such standards.

EPA has promulgated general conformity regulations at 58 *Federal Register* 63214 (November 30, 1993) implementing Section 176(c) for actions in nonattainment and maintenance areas, to be codified at 40 CFR Section 93.150 et seq. Among other things,

these regulations establish de minimis levels for actions requiring conformity determinations (Section 93.153 (b)), exempt certain actions from conformity determinations (Section 93.153(c)(2)), establish reporting and public participation requirements (Sections 93.155 and 93.156), and create criteria and procedures that federal agencies must follow for actions required to have conformity determinations (Section 93.158). The applicability of these regulations should be discussed in the EIS.

The NPS must show that the proposed project meets or is exempt from the general conformity requirements. If the applicant believes that its project is exempt from the general conformity requirements, then the applicant must explain the reasons for that exemption. If the project is subject to the general conformity requirements, the applicant should discuss the criteria that show the project will conform and identify the agency(s) responsible for making the conformity determination. 3

The EIS must identify all relevant, reasonable measures needed to mitigate air quality impacts. The probability of implementing each measure must be adequately discussed. If the mitigation measures are needed to demonstrate SIP conformity, then the process for implementation and enforcement of such measures must be described, including an implementation schedule containing explicit timelines for implementation. Written commitments must be obtained from the appropriate persons or agencies to implement any mitigation measures that are identified as conditions for making the conformity determinations.

WATER RESOURCES

Other than to indicate that the Bair Creek area may be classified as a wetland, the DEIS does not provide a sufficiently detailed discussion of wetlands. The DEIS does not state the level of direct or indirect impacts to wetlands. The FEIS should address the impacts that Historic Site developments may have on the Bair Creek wetland area in greater detail. It would be prudent to discuss the current wetland management techniques that are used, and to incorporate any appropriate management techniques into the FEIS. If you have specific questions concerning wetlands, please contact Mr. Jeff Rosenbloom, Chief, Wetlands and Sediment Management section at (415) 744-1962. 4

Also, the Bair Creek area identified in the DEIS could be subject to serious erosion impacts due to the construction and maintenance of the road/trail system proposed for the area. We are concerned the NPS does not offer an erosion control plan to

be implemented within the site. We recommend that the NPS place a preliminary erosion control plan in the Final EIS as the reference for future environmental documents. We are including, as attachment A, an outline of erosion control management practices for guidance on methods that can be used to minimize erosion from trail, road, and building construction projects.

The DEIS does not clearly indicate if a water conservation program will be implemented in the Historic Site. We recommend that the NPS outline this water conservation program and commit to its implementation in the FEIS. The DEIS states that the NPS will pump 10 million gallons of water for the park needs. However, there is no further discussion regarding the proposed agreement between LADWP and the NPS for the supply of water. The FEIS should discuss the impacts to the aquifer, and/or any springs or adjacent riparian areas from these activities. We also recommend that the NPS briefly discuss the terms of the water supply agreement with the LADWP, as appropriate.

We are concerned that the DEIS suggests that the existing sewage treatment system would be expanded as required without offering any further details as to what expansion would occur or what options would be employed. We recommend that the FEIS discuss this in more detail.

National Pollution Discharge Elimination System (NPDES)

The document does not indicate the extent of erosion impacts due to development and land disturbances at the Monument. The activities described in the DEIS could trigger the NPDES permitting requirements.

We could not ascertain the extent of surface land disturbance from our review of the document. According to the requirements in 40 CFR section 122.26 (b)(14)(x), if the cumulative amount of disturbed land from the proposed actions within any of the alternatives will be greater than five acres, then all of the actions would be subject to the General NPDES permit for Discharge of Storm water runoff associated with construction activities, California permit #CAS000002. If the NPS determines a permit will be necessary, the NPS should contact the State Water Resources Control Board (SWRCB) at 901 "P" Street, P.O. Box 100, Sacramento, CA, to obtain a copy of the permit and the Notice of Intent (NOI). The NPS must complete and file the NOI and must develop and implement a Storm water pollution prevention plan containing Best Management Practices prior to commencing any construction.

If the proposed actions will impact less than five acres the local Regional Water Quality Control Board may still require that the actions be subject to the General NPDES permit. In this situation, we recommend that the NPS consult with the local Regional Water Quality Control Board.

The NPS should identify, in the FEIS, the amount of land that will be disturbed by the development activities proposed in all of the alternatives and discuss the applicability of 40 CFR 122.26 (b)(14)(x) and the California General Permit # CAS000002. The FEIS should also describe the process the NPS intends to use in order to adhere to the NPDES permitting requirements, if they are applicable.

Threatened and Endangered Species

EPA encourages the NPS's continued coordination with the Fish and Wildlife Service in identifying threatened and endangered species, in accord with the Endangered Species Act (ESA). The document is vague in its discussion of the ecological areas within the historic site. We feel it would have been helpful to discuss the vegetation and wildlife topics separately and discuss the wildlife environment and conditions in more detail. We recommend that the FEIS discuss techniques for mitigating the development and revegetation impacts on endangered species and their habitat. The document did not indicate whether the NPS was going to engage in the formal ESA Section 7, consultation process. We recommend that the FEIS discuss where the NPS and FWS are in the process.

Environmental Justice

In keeping with Executive Order 12898, **Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations** (EO 12898), the FEIS should describe the measures taken by the NPS to fully analyze the environmental effects of the proposed Federal action on minority communities and low income populations. The intent and requirements of EO 12898 are clearly illustrated in the President's February 11, 1994, Memorandum for the Heads of all Departments and Agencies, attached. The FEIS should identify any Environmental Justice issues that may arise due to the implementation of any of the alternatives.

Attachment A

Erosion

1. Schedule projects so clearing and grading is done during times of minimum erosion potential.
2. Mark and clear off only areas essential for construction.
3. Avoid disturbing vegetation on steep slopes or other critical areas such as highly erodible soils and areas that drain directly into sensitive water bodies.
4. Route construction to avoid existing and newly planted vegetation.
5. Protect natural vegetation with fencing, tree armoring.
6. Cover or stabilize topsoil stockpiles.
7. Use wind erosion controls to act as wind barriers such as solid board fences, snow fences and bales of hay.
8. Seed and mulch disturbed areas.

Siting Roadways and Bridges

1. Consider the type and location of permanent erosion and sediment controls such as vegetative buffer strips, grass swales, energy dissipators and velocity controls.
2. Avoid marshes, bogs and other low-lying lands subject to flooding.
3. Avoid locations requiring excessive cut and fill.
4. Avoid locations subject to subsidence, land slides, rock outcroppings and highly erodible soils.
5. Size right-of-ways to include space for siting runoff pollution control structures, as appropriate.
6. Avoid locations requiring numerous river crossings.
7. Direct pollutant loadings away from bridge decks by diverting runoff waters to land for treatment.

RESPONSE TO COMMENTS BY THE ENVIRONMENTAL PROTECTION AGENCY

1. A number of additions and improvements have been made to the FEIS pursuant to comments on the DEIS, and we believe that the environmental analysis is fully adequate in achieving the purpose and spirit of the National Environmental Policy Act. Overall, our analysis indicates very little potential for adverse impact from implementation of the plan, and very considerable potential for beneficial impacts, particularly in the area of cultural resource preservation. Also note that the plan commits to additional environmental analysis in detailed planning and design stages.

While the document could be substantially enlarged with extensive discussions of the existing environment, we do not feel that would be useful, desirable, or in any way necessary to meet the purposes of NEPA. The analysis is purposely focused and concisely stated rather than encyclopedic.

Responses to specific items in this part of your letter are provided in paragraphs below.

2. Concepts of carrying capacity for park areas have evolved over the years, and the practice of assigning specific numerical values has evolved into more flexible and adaptive systems. The current thinking in park management is to deal with concepts of visitor use management, recognizing that the level of acceptable visitor use may vary widely based on management intensity. The nature of use, and the behavior of visitors, is seen in this concept as more relevant to achieving resource protection than the raw numbers of visitors, which may or may not be problematical. Overall we would protect both resource and visitor experience quality through a long-term program of impact monitoring and assessment of management techniques.

3. The several pages of comments on air quality seem more appropriate to a large-scale industrial or resource extraction operation than to a small historic site where the emphasis is on preservation and minimal land impacts. Nevertheless we have added significantly to the evaluation of air quality. See Appendix 6, Air Quality Analysis. This additional information documents and supports the initial conclusion that air quality will not be significantly affected by this project.

4. The EIS has been edited to indicate that there will be no impacts on potential wetland areas adjacent to Bairs Creek. The Bairs Creek area has been zoned as a natural area in the plan, with management to preserve natural values, including riparian vegetation and potential wetlands. No projects will be undertaken in this vicinity which could impact these values.

The proposed road/trail system will not result in new disturbed areas but rather consists of minor improvements of the existing road gridwork. This has been further clarified in the FEIS. Drainage and erosion concerns will be taken into consideration in the design process and when improvements are completed there should be less erosion than now occurs. Road and trail improvements will be designed consistent

with the guidelines in your Attachment A.

Water conservation will be practiced at Manzanar as a matter of agency policy. This is noted in the FEIS. Water use at Manzanar will represent an insignificant addition to the overall water withdrawal by LADWP. The agreement for water supply between NPS and LADWP is an administrative matter without significant planning or environmental implications. Net withdrawal will be extremely limited because wastewater will be disposed onsite through a sewage disposal system engineered in accordance with state and local requirements.

5. On balance, it is expected that the elimination of random motor vehicle use and seasonal grazing activities, coupled with improved surface water management through cooperative planning with LADWP, will produce a net reduction of the amount of exposed land and subsequent erosion in the area. This is clarified in the FEIS.

6. The nature of the area and the nature of the proposed plan are such that the potentials for adverse impacts on threatened and endangered species are quite limited. Nevertheless, the FEIS contains provisions to ensure that subsequent detailed planning and design work includes detailed surveys prior to taking any action that could affect threatened and endangered species. Consultation is not appropriate at this stage of planning but will be undertaken as needed.

7. The proposed plan will not have any adverse impacts on low-income groups. The recreational and educational opportunities will be available to all socio-economic groups. The project is considered by many Japanese Americans, a minority group, to have beneficial impacts in educating the general public about the relocation program. The project also has the potential for expanding the awareness of the general public of Paiute-Shoshone culture.

The FEIS has been expanded to include a statement regarding impact on environmental justice.

OFFICE OF HISTORIC PRESERVATION
 DEPARTMENT OF PARKS AND RECREATION
 BOX 942896
 SACRAMENTO 94296-0001
 (916) 653-6624
 (916) 653-9824



February 26, 1996

George Turnbull, Superintendent
 Pacific Great Basin
 System Support Office
 National Park Service
 600 Harrison Street, Suite 600
 San Francisco, CA 94107-1372

Dear Mr. Turnbull:

The Office of Historic Preservation (OHP) has received your letter of January 30, 1996 transmitting the Draft General Management Plan and Environmental Impact Statement for Manzanar National Historic Park Site, Inyo County.

The Draft General Management Plan represents a sensitive understanding of a controversial period of American history by considering the full range of historical values and resources associated with the Manzanar area, inclusive of Native American concerns, pioneer agricultural enterprises, and the WWII camp experiences. The following comments are provided for consideration by the National Park Service (NPS):

1. The OHP concurs with the NPS' recommendation to adopt Alternative C: Enhanced Visitor Experience as the proposed action. Alternative C provides the optimum opportunity for resource management, protection, and interpretation.

2. The OHP supports the establishment of a "Demonstration Block" with relocated or reconstructed representative barracks and watchtowers to facilitate a visual and meaningful understanding of the camp experience.

3. The OHP supports the rehabilitation and maintenance of the original school auditorium for adaptive use as an interpretative/visitor center. The Draft Plan recognizes the importance of proper rehabilitation, maintenance, and pest control of the building. Nevertheless, the NPS must address contingencies to protect the structure against possible vandalism and other harm. All possible threats and danger to the vacant auditorium must be minimized, especially after the departure by the Inyo County Public Works Department.

4. The OHP appreciates the NPS' proposal to preserve the two existing sentry buildings located adjacent to Highway 395 through rehabilitation and regular scheduled maintenance. However, as with the auditorium, the sentry buildings must be protected against possible damages or vandalism.

5. The OHP supports the relocation of all memorial plaques from the main entrance area to the visitor center area. The State Historical Landmark plaque should be removed with care to avoid damages to the sentry building. NPS must consult with the OHP prior to the proposed removal and relocation of the State plaque. The NPS should also consider the feasibility of installing a replica of the historic WRA sign at the main entrance to Manzanar.

6. The Manzanar cemetery area is an important feature associated with the camp experience. However, the management and interpretation of the cemetery area is not discussed in the Draft Plan. The isolated location of the cemetery area represents a possible threat to the integrity and safety of the cemetery features.

7. The spelling of the term "Japanese American" should be written without a hyphen.

Should you have additional questions or wish to have the OHP participate in the forthcoming scheduled public hearings on the Draft Plan in Southern California, please do not hesitate to contact Eugene Itogawa at (916) 653-8936.

Sincerely,



Cheryl Widell
State Historic Preservation Officer

**RESPONSE TO COMMENTS BY THE OFFICE OF HISTORIC PRESERVATION,
STATE OF CALIFORNIA**

1. We are aware of the need to provide for protection of these structures and this is proposed to be achieved through augmented staffing, a sprinkler system in the auditorium, night exterior security lighting, and fire and intrusion alarms. Please note that the final plan provides increased protection to the historic entrance and the sentry posts by routing visitors into the site via the existing non-historic entrance to the auditorium.

2. We recognize the need to consult with OHP prior to relocation of the subject plaque and this requirement has been noted in the plan.

We agree that a replica sign would be a useful interpretive feature at the entrance area.

3. The cemetery will be maintained and protected as part of the overall operation. Protection will be substantially improved as a result of closing and rerouting the gravel road which presently passes immediately to the east. Interpretation will be further detailed when the interpretive prospectus for the site is completed.

4. The suggestion is noted and the document has been edited accordingly.

DEPARTMENT OF TRANSPORTATION

100 SOUTH MAIN STREET
SACRAMENTO, CA 95814



(619) 872-0691

February 7, 1996

File: Iny-395-68.0

Mr. Ross Hopkins, Superintendent
Manzanar National Historic Site
P.O. Box 426
Independence, California 93526

Dear Ross:

Thank you for the opportunity to review the draft General Management Plan and Environmental Impact Statement for the development of the Manzanar National Historic Site. We have the following comments to offer:

- * The Alternate C proposal shows the main entrance at the current channelized intersection. It also depicts a service road and gate at the existing road to the auditorium. These two intersections are too close together. Past discussions with the NPS defined an internal frontage road from the existing entrance at the stone sentry posts back to the auditorium or vice versa. In any case, future expressway standards for Route 395 can only allow for one highway access. 1
- * We would like to see the full environmental document which could assist us with our highway project planned for this area. 2

If you have any questions about our comments, please give me a call. If you would, please call Mr. Tom Dayak at (619) 872-0690 about providing him with a copy of the EIS. Thank you.

Sincerely,

F. KATY WALTON, Chief

Transportation Planning & Public Transportation

FKW:mam

cc: Dennis Manning
Tom Dayak

RESPONSE TO COMMENTS BY THE DEPARTMENT OF TRANSPORTATION STATE OF CALIFORNIA

1. As a result of public input and continuing concerns re protection of the integrity of historic resources at the historic entrance, the final plan proposes blocking of the historic entrance and the use of the existing entrance road to the auditorium as the public access. This should be consistent with the future expressway standards.

2. The environmental statement for the general management plan has been completed at a conceptual level and is combined with the general management plan. Additional, more detailed compliance will be completed for various projects and plans as they are developed in the future.

The superintendent will work closely with District 9 CALTRANS staff in further highway project planning. From the standpoint of protecting park resources, providing a quality visitor experience, and protecting the safety of both visitors and other highway travelers, relocation of all lanes of the highway further to the east would be highly desirable.

WILLIAM H. MICHAEL
Museum Director



(619) 878-0258
or
(619) 878-0364

COUNTY OF INYO
EASTERN CALIFORNIA MUSEUM
155 N. GRANT ST.
P O. Box 206
INDEPENDENCE, CA 93526

May 1, 1996

Superintendent Ross Hopkins
Manzanar National Historic Site
P O Box 426
Independence, CA 93526

RE: *Draft General Management Plan and Environmental Impact Statement for
Manzanar National Historic Site*

Dear Mr. Hopkins:

I support *ALTERNATIVE C* as identified in the *Draft General Management Plan and Environmental Impact Statement for the Manzanar National Historic Site* (GMP) as the minimal acceptable level of development of the Manzanar Historic Site. Having been involved with the Manzanar site for over 10 years, and with the NPS planning process for Manzanar since the beginning, I am increasingly convinced of the site's importance and of the need for a high level of protection of site cultural and natural resources. I hope the following thoughts and comments may be of some use to the National Park Service.

General comments on *ALTERNATIVE C*:

The GMP lists many plans reports, studies, and/or agreements to be prepared in the future, including:

page 23	<i>Historic Structures Reports (for 3 intact structures)</i>
page 24	<i>Cultural Landscape Management Plan</i>
page 25	<i>Scope of Collections Statement</i>
page 25	<i>Ethnographic Assessment</i>
page 25	"overall water resource management plan to be prepared for the site in cooperation with LADWP"
page 26	<i>Interpretive Prospectus</i>
page 33	water use agreement with LADWP

Comments to Manzanar NHS GMP

May 1, 1996

Page 2

Other plans/studies that have been mentioned include a fire protection plan for the site in conjunction with California Division of Forestry (and the Independence Fire Department), a hazardous materials study for the site, an agreement with Scott Kemp regarding grazing activities on the site, and the Historic Resource Study being prepared in Denver.

It would be helpful if these plans, agreements, and studies (all termed projects for this discussion) could be placed in some sort of matrix where relative project priorities, identification of agencies, offices, departments or individuals responsible for the accomplishment of each project, and identification of proposed time-frames for accomplishment of each project are identified. The public would then have a clear picture of what is required to make the Manzanar National Historic Site operational.

Specific comments on *ALTERNATIVE C*:

page 9 The plan mentions a seven-member volunteer team of landscape architects. The list on page 55 includes eight names; in recognition of the tremendous effort these individuals put into the GMP, this minor discrepancy should be clarified.

page 24 I strongly support the development of a cooperative agreement with the Eastern California Museum (ECM) for curation of historic objects, photographs, and documents. In the GMP, the Eastern California Museum should be clearly identified as an agency of county government (a division of Inyo County). As such, some of the authority for cooperative agreements in a government-to-government relationship may already exist, and specific legislative action may not be required.

It is apparent that any sort of cooperative agreement between MNHS and the ECM along with the development of specific space at the ECM for additional Manzanar-related collections will take many months to reach fruition. In the meantime, a strategy or interim collection management plan needs to be developed to address the question of collections or objects that are available now and in the near future. The increasing age of former internees makes this a critical need. Donors (and potential donors) need to know that the objects they donate are guaranteed a secure future.

page 25 According to the GMP, storage of archaeological specimens not needed for interpretive purposes will be "in an off-site NPS repository or under agreement with a non-NPS repository." In as much as three field seasons

of archeological work have already been conducted, I think it should be indicated to the public that collections already exist, and the location where this material is stored.

3

page 26

Interpretive Prospectus – although it is somewhat premature to comment on the content of an Interpretive Prospectus, I am attaching the State of California's Interpretive Plan (see **Attachment A**) prepared in the 1970s. It could be a good place to start, particularly with its recognition of primary and secondary themes. The only reason this site was significant enough to warrant National Park Status is because of the World War II history of the site. This should be identified as the primary theme. I agree that it is important to tell the whole history of the site, and by identifying these as secondary—but still significant—themes, they can be addressed in a manner proportionate to their significance to the site.

4

page 28

Interpretive Center – the use of oral histories in the interpretation of the site is discussed. If this is indeed to become a tool for interpretation, an effort to collect histories of former internees needs to receive the highest priority and begin immediately. It has been 51 years since the site was closed, and those who were adults in the camp are getting older and older. If this important first hand information is to be collected, it must be done soon.

5

page 28

I strongly support the use of block 8 and/or 14 for demonstration purposes over Block 13 as listed in ALTERNATIVE B. The increased distance of these blocks from both the park entrance and the traffic of highway 395 will make the interpretive experience more meaningful.

page 29

Regarding the continued use of the historic entrance – this entrance is currently in use, and its evaluation should begin now. Because it will obviously still be many months before the NPS is operational at the site, use of the entrance can continue to be monitored informally with more structured monitoring as soon as staffing allows. NPS should be prepared to make a recommendation to change the entrance prior to the five year time frame mentioned in the GMP if circumstances indicate that a change needs to be made sooner to protect the valuable resources located there. Five more years of using this entrance may be too many, and the plan to change it could come too late.

6

Comments to Manzanar NHS GMP

May 1, 1996

Page 4

page 29 As mentioned above, the amount of time consumed by the planning process along with the time it will take to implement the completed plan will make any extensive use of former internees as tour guides very difficult. Explorations of methods by which this can be accomplished while the site is being developed should be considered (another obstacle to overcome in using former internees as guides is the isolation of the site).

page 29 I strongly support the development of a shuttle system as a method of providing better protection for fragile park resources. The use of electric or other alternative fuel powered vehicles should be pursued.

page 30 the realignment of the entire 4 lane highway to the east is certainly the preferred alternative. The use of the existing highway as a frontage road would do much to alleviate concerns over traffic safety and resource protection. If a shuttle system is brought into use, the main entrance could be moved to the vicinity of the auditorium, and the shuttle route could begin with a drive to the historic entrance (along the frontage road) thus capturing the preferred visitor experience of entering the camp proper through this entrance.

page 33 Site boundary – I strongly support the Manzanar Advisory Commission's recommendation that great effort be made to enlarge the boundary to approximately 800 acres during the initial land transfer process, and that this 800 acres be put entirely in NPS ownership as soon as possible. These enlarged boundaries should encompass the Military Police Camp, the primary dumps to the west of camp, the foundations and/or sites of the guard towers to the north (with relocation of existing north road if required), the numerous archaeological sites immediately adjacent to the existing Highway 395, and the agricultural and Native American sites along the south edge of the site.

page 34 Because of the many archaeological sites located in their right-of-way, CALTRANS should be added to the list of agencies where cooperative agreements are needed to protect cultural resources.

Other thoughts on site protection:

A long-term strategy for protection of sites related to the MNHS but not within the approved or adjusted boundaries should be articulated. Memorandum of

Comments to Manzanar NHS GMP

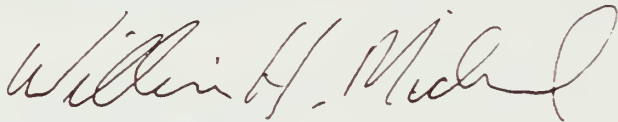
May 1, 1996

Page 5

Understandings (MOUs) or Cooperative Agreements with BLM, DWP, and CALTRANS need to be prepared for cultural sites in their respective ownerships. These MOUs should have a stated time period for which they will be monitored, and an evaluation method to determine their effectiveness. If it is determined that the MOUs are not providing adequate resource protection, an effort to acquire important sites outside the authorized boundaries should be made by the park service. Among the sites to be monitored closely would be the reservoir and adjacent waterways, the sewage treatment plant, any dams or waterways on or leading to the camp from George's Creek, the existing homesteads to the south of the site that show evidence of multiple use (homesteader and internee), and possibly the Manzanar Airport. Even though the airport is not directly related to the operation of the Internment Camp, it is an integral component of the story of World War II in the Owens Valley and should be protected.

Thank you for the opportunity to comment on the DRAFT GMP. I hope my comments are of some assistance. All of the people who contributed to this effort (particularly Dan Olson and yourself) should be congratulated for a job well done.

With best regards,



William H. Michael

Director, Eastern California Museum

Vice Chairman, Secretary of the Interior's Advisory Commission to MNHS

attachments: State of California Theme Study for Manzanar

cc: Inyo County Supervisor Robert Gracey
Sue Embrey, Chairman Manzanar Advisory Commission

RESPONSE TO COMMENTS BY THE EASTERN CALIFORNIA MUSEUM, COUNTY OF INYO

1. All parks are required to prepare and annually update an Outline of Planning Requirements. This document lists all the required plans and studies and shows the priority, sequence, and responsibility for preparation. The park will undertake the preparation of this document in the near future.
2. We agree that there is urgency to the collection management issue. While the park will do its best to address the issue on an interim basis, implementation of the proposals included in the plan may realistically be several years in the future.
3. The document has been edited to indicate that NPS has collected artifacts at Manzanar and they are stored at the Western Archeological and Conservation Center in Tucson.
4. The interpretive materials developed by the state in the 1970's will be made available to NPS interpretive planners as suggested. The text of the plan has been edited to indicate the dominance of the relocation-center era in site management, including interpretation.
5. We agree that the collection of oral histories is an urgent matter given life expectancies and this urgency has been conveyed to the priority setting authorities within the Park Service. However, funds for such endeavors are quite limited. The park will continue to pursue early efforts at oral history both through normal funding channels and through other alternative source which may be available.
6. The final plan provides for closing the existing access to the historic entrance and bringing visitors into the site via the existing road to the auditorium. Under this approach, visitors would leave their vehicles in a nearby parking area and tour the entrance area on foot.
7. The plan does not need to be completed in order to make use of volunteer tour guides. Some training and supervision of such volunteers is needed, however, and the early implementation of such a program is hampered by the limited staffing and operational funding thus far available to the site. The park will initiate such a program as soon as feasible.
8. We agree that site protection and quality visitor experience would best be served by relocation of U.S. 395 to the east and we have noted this in the general management plan and in our response above to CALTRANS.
9. Legislation to revise the boundary of the site to encompass this expanded area is currently under consideration in Congress.
10. We have noted the importance of CALTRANS as a land owner/manager and a

potential partner in the protection of cultural resource, including the historic scene.

11. The plan expresses the interest of the National Park Service in efforts to protect and interpret related cultural resources on adjacent lands. At this point the mechanisms for cooperative efforts have not been determined and cannot be pending discussions with the respective agencies. In any event, we would not anticipate changes in the authorized boundary within the 15-year life of this plan. When a new general management plan is completed, review of the adequacy of the boundary and the need for inclusion of additional resources would be completed as a matter of standard policy.



RICHARD I. RIORDAN
Mayor

Commission
DENNIS A. TITO, *President*
JOSÉ DE JESÚS LEGASPI, *Vice President*
CAROLYN L. GREEN
JUDY M. MILLER
MARCIA F. VOLPERT
IRENE N. KISHI, *Assistant Secretary*

WILLIAM R. McCARLEY, *General Manager*
KENNETH S. MIYOSHI, *Assistant General Manager and Chief Engineer*
ELDON A. COTTON, *Assistant General Manager—Energy Services*
JAMES F. WICKSER, *Assistant General Manager—Water*
THOMAS M. McCLOSKEY, *Assistant General Manager—Business Planning,
Marketing and Customer Service*
M. FAYE WASHINGTON, *Assistant General Manager/Chief Administrative Officer
—Central Support Services*
PHYLLIS E. CURRIE, *Chief Financial Officer*

March 27, 1996

Mr. Ross Hopkins, Superintendent
Manzanar National Historic Site
P. O. Box 426
Independence, CA 93526

Dear Mr. Hopkins:

Los Angeles Department of Water and Power (Department) Comments

Thank you for the opportunity to review and comment on the Manzanar National Historic Site Draft General Management Plan & Environmental Impact Statement (GMP). Overall, we find the GMP to be a clear and concise document that serves its intended purpose very well.

As a general comment to the GMP, we suggest that the GMP should include a table that would allow the reader to compare the features of Alternatives A, B, and C. Further, we offer the following specific comments on the GMP:

1. Page 13, paragraph 5 (same as page 26, paragraph 2)

In years of high runoff, flows conveyed only in natural channels would result in extensive flooding of the entire area. The Department's spreading activities are essential in controlling flows. It is suggested that the text in the first sentence of the paragraph is changed from "directed to natural channels" to "conveyed".

2. Page 15, paragraph 1, bullet 5 (same as page 27, paragraph 3)

The Department certainly hopes that all discussion of "Valley Water Wars" will give due attention to the benefits that were derived by the diversion of water that helped create the Los Angeles metropolis as it exists today. Further, the benefits to the Owens Valley as a result of the single land-ownership should also be described.

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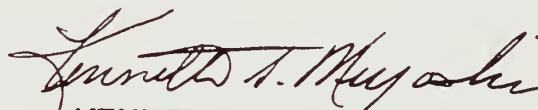


3. Page 15, paragraph 2 (same as page 27, paragraph 4)
The last word of the second line is correctly spelled 'spatial', not 'spacial'.
4. Page 17, paragraph 4
The GMP should explain the significance of the five year period.
5. Page 17, paragraph 6 (same as page 30, paragraph 4)
These roads are extensively used by Department personnel. Any road closures should be coordinated with the Department.
6. Page 18, paragraph 4
The GMP should explain the implications of the sentence "The site is not intended to serve as a highway rest stop or general information facility".
7. Page 30, paragraphs 6 and 7
Reference should be made to Map 5, not to Map 4
8. Page 31, last paragraph
Differences from Alternative 3 language on page 18, last paragraph, should be highlighted.
9. Page 32, paragraph 5
Additional language to that of Alternative B should be highlighted.
10. Page 44, paragraph 3
The fifth word of the third line should read 'pest', not 'past'.
11. The GMP should be explicit about the intentions of the National Park Service regarding entry fees to the site.

} 3
} 4
} 5
} 6
} 3
} 7

We wish you success in completing the Final GMP, and we hope that you find our comments useful. If you have any questions, please call me at (213) 367-1407, or Mr. Peter Kavounas of my staff at (213) 367-1032.

Sincerely,



KENNETH S. MIYOSHI
Assistant General Manager and
Chief Engineer

c: Mr. Peter Kavounas

RESPONSE TO COMMENTS BY THE DEPARTMENT OF WATER AND POWER, CITY OF LOS ANGELES

1. The text has been edited to indicate the need for coordination of water resource management between NPS and the department to minimize adverse impacts on cultural resources and ensure effective recharge and water collection activities.
2. NPS will ensure that interpretation of this important aspect of Owens Valley history, with its specific application to the history of Manzanar, will be balanced and factual. We would anticipate working with LADWP and other interested parties in the development of interpretive materials dealing with this phase in the site's history.
3. Editorial suggestions noted and changes have been made in the document as appropriate.
4. The discussion of the five-year period has been deleted in the final document.
5. We recognize the need of LADWP personnel for access and we would most certainly coordinate any road closures with the department. The purpose of the noted closure would be to provide additional protection to the cemetery area from casual or incompatible public uses.
6. There are a number of existing areas and facilities to provide for the convenience and information needs of highway travelers. In addition to the CALTRANS areas on U.S. 395, the Interagency Visitor Center in Lone Pine provides extensive information on public lands and other attractions in the region. The goal at Manzanar is to focus on the information needs and support facilities needed to provide for a meaningful appreciation of the area's rich cultural phenomena.
7. A decision in this matter has not been made. The established legislative authority provides discretion on whether fees are collected at sites such as Manzanar, i.e. fees are not charged at all for sites which are considered to serve memorial functions and are often waived at recent-history sites for visitors with a personal association with a site. We would not, in any event, anticipate collecting fees at Manzanar until the site is operational and we can provide a reasonable range of visitor services. It is also appropriate to note that Congress has been debating several issues relating to fees for the past several years and amending legislation may well further define the situation for Manzanar.



The Manzanar Committee

1566 Curran Street / Los Angeles, California 90026

Telephone (213) 662-5102

May 2, 1996

Ross Hopkins, Superintendent
Manzanar National Historic Site
P.O. Box 426
Independence, CA 93526-0425

Subject: General Management Plan and Environmental
Impact Statement for Manzanar National
Historic Site

Dear Mr. Hopkins:

We are in receipt of the General Management Plan and Environmental Impact Statement for the Manzanar National Historic Site. You, Dan Olson and the NPS planning team have done a superior job of research and planning. We congratulate you on an exceptionally well-thought out general management plan.

The Manzanar Committee supports Alternative Plan C and submits the following for your consideration:

1. Cultural Resource Management

We support the preservation of the three intact buildings on the site: the auditorium, and the two rock sentry posts. We believe the historic auditorium to be the best structure to be used as an interpretive center once the park becomes operational

We strongly recommend the reconstruction of some of the rock gardens located throughout the camp area to give the viewer an enhanced visitor experience.

We support the placement of one or more barracks in the demonstration blocks of Blocks 8 and 14. A demonstration block would not be complete without the inclusion of latrines, mess hall and laundry building. We encourage the addition of these structures in the demonstration block.

It is absolutely essential that one or more guard tower be reconstructed. Placement in the midpoint on the south boundary would be easily seen by visitors. All other locations of guard towers should be identified.

We support NPS giving substantial support to the Eastern California Museum and assist in the development of additional space for housing a Manzanar collection.

We encourage the participation of the Paiute-Shoshone descendants in preserving artifacts lying within the boundary of Manzanar.

While PL 102-248 provides for the protection of water rights for the City of Los Angeles, Department of Water and Power, we are strongly in favor of water spreading activities to be conducted away from the boundary of the Manzanar site.

This past season (1995) when surface run-off was extensive, considerable damage was done to the hospital area, wiping away almost half of the remains, cutting deep gullies and moving artifacts away from their origin, undercutting foundations and damaging the area around Children's Village. Destruction and movement of cultural resources put an entirely different interpretation on each of the sites so damaged.

With previous damage caused by the film crew shooting scenes for "Maverick III", irreparable damage has been done.

We urge NPS to negotiate with the City of Los Angeles to direct their water spreading activities outside the Manzanar boundary to protect the remaining cultural resources.

2. Interpretation:

We support the specific themes of native American settlement, and the pioneer township which flourished at Manzanar before the World War II experience. We suggest the theme of eviction and resettlement to tie together the broad scope of human history at Manzanar.

We support the inclusion of the reservoir and other historic features which may be outside the original 550 acres as addressed in the legislation and support the addition of acreage not to exceed 800 acres.

3. Circulation and Parking:

While we have tentatively agreed that the historic entrance could be used for visitors' the recent increase in visitation has caused us great concern. We believe the entrance should be protected. We suggest that the non-historic road to the auditorium be the visitors entrance.

We support the removal of memorial plaques to a location near the auditorium. We would oppose any attempt to store the California State plaque out of sight. The National Park Service may want to consider the plaque as part of a historic continuum of a controversial issue.

General Management Plan

Since CalTRANS already has plans to widen Highway 395, we believe that negotiations should take place so the highway can be moved farther east and the existing highway used as frontage road to better serve the public and protect the cultural resources at the site. 6

We support the recommendation that the existing unpaved road to the cemetery west of the site be gated to reduce public access. Access by the City Department of Water and Power can be re-routed to other existing roads to the west of the historic site.

We are especially concerned that no fees will be charged at the Manzanar Historic Site; some self-sustaining funding should be considered and legislation requested, if necessary to accomplish this goal. Many former internees would be willing to pay for what they believe to be an important period of their history. 7

Thank you for allowing us to comment on the General Management Plan.

We will do whatever necessary to assist you in the implementation of the final draft. Again, our congratulations on a well-conceived project.

Sincerely yours,


Sue Kunitomi Embrey

cc: George Turnbull, Superintendent
Stanley Albright, Field Director, Pacific West Area
Dan Olson, Regional Planner
Kenneth S. Miyoshi, Assistant General Manager
City of Los Angeles Department of Water and Power

RESPONSE TO THE MANZANAR COMMITTEE

1. We agree that management of water resources is an important aspect of resource protection. As indicated in the plan, a water resources management plan should be prepared in consultation with the Department of Water and Power to minimize the impact of flooding and ground disturbance from water spreading activities within the area of the historic site.
2. We agree that the theme of eviction and resettlement may provide a fertile concept for linking the several periods of habitation at Manzanar. The means of best interpreting this will be explored in detail when the interpretive prospectus for the site is undertaken in future years.
3. Legislation to authorize a boundary of 800 acres is in process and is expected to be enacted into law. This expanded area does not include a number of more remote historic features of the camp such as the reservoir. However, we intend to work with the appropriate public land managers, including BLM, LADWP, and CALTRANS, to encourage the protection and interpretation of these features.
4. We agree. The final plan provides for closing the existing access to the historic entrance and bringing visitors into the site via the existing road to the auditorium. Under this approach, visitors would leave their vehicles in a nearby parking area and tour the entrance area on foot.
5. The disposition of the State Historical Marker, which is now affixed to the Military Police sentry post, was the subject of considerable comment at the March 13 public meeting in Independence. (The draft general management plan recommended that this marker, along with the others in the area, be relocated to the vicinity of the auditorium to restore historic conditions and reduce visitor congestion in this area.)
A portion of the public proposed removal and destruction of the plaque because of language considered by them to be offensive and inaccurate. Another portion of the public defended the language as appropriate and representative of strong feelings pertaining to the relocation. Yet another group asked that the plaque be preserved and publicly displayed as an artifact of history.

The final plan continues to call for relocation of the plaque to the vicinity of the auditorium. Details of the location and its presentation will be determined as interpretive planning is completed. The Park Service does not have authority to destroy the State plaque and regards it as part of the history of the site. In the long term it may be an important part of an exhibit illuminating the discord, rancor, and controversy surrounding the establishment of the area as a National Historic Site and the interpretation of the relocation program.

Please also see response #2 to Office of Historic Preservation.

6. We agree that site protection and quality visitor experience would best be served

by relocation of U.S. 395 to the east and we have noted this in the general management plan and in our response above to CALTRANS.

7. A decision in this matter has not been made. The established legislative authority provides discretion on whether fees are collected at sites such as Manzanar, i.e. fees are not charged at all for sites which are considered to serve memorial functions and are often waived at recent-history sites for visitors with a personal association with a site. We would not, in any event, anticipate collecting fees at Manzanar until the site is operational and we can provide a reasonable range of visitor services. It is also appropriate to note that Congress has been debating several issues relating to fees for the past several years and amending legislation may well further define the situation for Manzanar.

March 16, 1996

Honorable Bruce Babbitt
Secretary
U.S. Department of the Interior
1849 "C" N.W.
Washington, D. C. 20240

Dear Secretary Babbitt:

In accordance with Public Law 102-248, a general management plan has been completed for the Manzanar National Historic Site. The National Park Service recommends alternative Plan C. I urge you to adopt it as part of the final general management plan.

Alternative Plan C is currently the best opportunity of selection. This plan does include the Native American Indian and Japanese American cultures, and the planning process members will continue to actively consult with these groups.

The site itself is very rich in historic and prehistoric archeological resources, with fabric and artifacts located virtually in every square foot. In order to preserve all of the above we urge you to include the 300 additional acres of surrounding land to complete the study and help make the site complete.] 1

Additionally, we urge you to consider a higher budget to fund and sustain the Manzanar Historic Site. The skeleton crew of one desperately needs more staff. The funding sources will allow the plan to deliver the services and complete the building of the site.] 2

Needless to say, 120,000 Japanese Americans passed through the ten concentration camps--Manzanar being one of the principal camps recognized in such an atrocity of World War II.

Time grows short, and our community wants to see this Memorial and Interpretive Center complete while we are living. Our children deserve the right to know their past history in the manner in which it was played.

We count on you, Secretary Babbitt, to insure that our history will be told correctly.

Sincerely yours,

RESPONSE TO FORM LETTER TO HONORABLE BRUCE BABBITT

One hundred and thirty-five individually signed copies of the above form letter were transmitted to Secretary of the Interior Bruce Babbitt and were subsequently forwarded to the Park Service for the official Manzanar general management plan record.

1. The proposed plan recommends acquisition of the additional 300 acres. Legislation to add this acreage to the authorized boundary is currently pending in Congress.
2. The plan includes proposed staffing and funding sufficient to protect the resources and provide an adequate range of visitor services.

Petition # 1

TO: ~~Ross Hopkins~~ -- ~~Manzanar National Historic Site~~

The signatures below represent the people of Bishop who do not wish Manzanar to be a monument for Japanese Relocation Camps. Economically the cost to taxpayers will far exceed whatever income or revenue will come from visitors &/or tourists.

We Do not have any bitterness or animosity toward any Japanese who were loyal to the United States but under suspicion during WWII, and who needed protection.

Name (PRINT)

Address

Signature

RESPONSE TO PETITION # 1 FROM RESIDENTS OF BISHOP

This petition was circulated in the Bishop, California area and was signed by 109 persons.

1. Legislation was passed by Congress and signed into law by the President in 1992 to create the Manzanar National Historic Site. The purpose of the general management plan is outline the steps to be taken to preserve the area in perpetuity and provide for public use. The action proposed in the petition is beyond the authority of the Park Service. Deauthorization of the site would be required to achieve the goal of the petition. This could be accomplished by Congress.

Petition # 2

5-3-96

3

TO: Ross Hopkins - Manzanar National Historic Site

The undersigned residents of Bishop wish the development of the Manzanar Site to be as economical as possible. 1

We would also like to see equal attention given to American Indians and Pioneers who first occupied the area. The relocation camp was never a "concentration" camp and should not be portrayed as such. 2

A museum with artifacts covering all phases of the location's history equally would be, in our view, the best policy. 3

Name

Address

Name (PRINT)

RESPONSE TO PETITION # 2 FROM RESIDENTS OF BISHOP

This petition was circulated in the Bishop, California area and was signed by 55 persons.

1. We agree that steps should be taken to operate this and every site as economically as possible. As indicated in the proposed plan, we propose to seek partnerships with a number of organizations to maximize effectiveness, and will make significant use of volunteers at the park.
2. The legislation bases the significance and purpose of the site on the relocation of Japanese Americans during World War II, and hence this part of the site's history must have a dominant role in preservation and interpretation. However, the other parts of the site's history are also important and will be well-represented in the preservation and interpretation programs. Archeological investigations, for example, have identified resources relating to a long continuum of human use at Manzanar.
3. The proposed plan would provide for use of the camp auditorium as an interpretive center for the area, and the center would interpret the continuum of use at the site, with some exhibits including museum objects. However, the plan proposes that the Eastern California Museum play a major role in curation and display of museum objects from all of the periods. We believe this cooperative approach is more cost-effective than a major new museum effort by the Park Service.

USEPA (1101)

401 "M" St., SW

Washington, DC 20460

Dear Ms. Browner,

Re: Environmental Impact on

Owens Valley, Manzanar National
Historic Site, Inyo County, Calif.

The General Management Plan and Environmental Impact Statement draft excludes an important environmental impact on the California watershed of Owens Valley.

This watershed provides water to Northern and Southern California, and there seems to be no consideration of this in the National Park Service's draft.

Additionally, whenever possible, California environmentalists have fought to preserve the wetlands from encroachment by those who see "land" in dollar-value, with little or no concern for bird, animal, or forest.

A proposed "shuttle system (to be) operated during heavy use periods", suggests a depreciation of the glorious smog-free, smoke-free, blue skies of Owens Valley. Owens Valley lies between two mountain ranges and has been grazing land for a variety of small creatures, cattle, all in balance with nature.

The National Park Service intends to acquire additional lands "over and above the legislatively authorized boundary of Manzanar War Relocation Center." One would expect that a government department such as The Department of the Interior, NPS, would be subject to lawful acquisitions.

Funds allocated to the National Historic Park at Death Valley, California, have been switched to support the NPS at Manzanar National Historic Site, without concern for the negative environmental impact on Death Valley Monument.

I am a founding member of The National Trust for Historic Preservation. Preservation and conservation are partners in the ongoing struggle for environmental containment beneficial to future generations. It was sad and frustrating to read reports about the "trashing" of mountain paths due to busloads arriving in Owens Valley, without toilet facilities. Branches, flowers, rocks, and other types of souvenirs made a shambles of the area.

The NPS has taken much-needed funds on already established sites, parks, and monuments, so that the NPS could support the "annual Spring Manzanar Pilgrimage, organized by the Manzanar Committee"...the latter a strictly politically motivated ethnic group with an agenda dating back to the early 1970s. The NPS should use such funding for prescribed Dept. of the Interior concerns, especially in light of cut-backs in public agencies.

The Draft, abovementioned, suggests "no significant adverse impacts are anticipated". The NPS is begging the fundamental issue of environmental protection; it cannot "anticipate" adverse impacts, nor can it assure that any such impacts would be insignificant. The threat to our watershed and a decrease in much-needed wetlands, is hardly insignificant and can be anticipated.

Sincerely,

cc: Felicia Marcus, Regional Administrator
USEPA Region #9, 75 Hawthorne St.,
San Francisco, CA 94105.

(Mrs) Lillian L. Baker
1996-97: Who's Who in California,
Who's Who Historical Society

Ross Hopkins, Supt., Manzanar National
Historic Site, PO Box 426, Independence,
CA 93526

Encl: Business Card

RESPONSE TO LILLIAN BAKER

1. The project will have no impact on wetlands. The only areas which could conceivably be defined as wetlands are riparian areas immediately adjacent to Bairs Creek. The Bairs Creek area is specifically identified in the plan as an area in which no development or improvements would occur.

2. Manzanar NHS will not significantly affect the overall level of vehicle traffic and human presence in the Owens Valley. Most of the visitors will include Manzanar as one stop in a broader itinerary which may include lakes, ski areas, other national parks, and various Sierra Nevada attractions.

The shuttle system is intended as a tool for visitor management during peak periods of use. While the primary objectives of the shuttle are visitor convenience and cultural resource protection, a side benefit will be the reduction in motor vehicle usage on the site, reducing vehicle emissions and the potential for generation of dust.

3. Please see the authorizing legislation in the appendix, which provides a mechanism for boundary adjustments over and above the authorized boundary by administrative action. You should also be aware that Congress is currently considering legislation to increase the authorized boundary to approximately 800 acres.

4. Death Valley National Park and Manzanar National Historic Site are both authorized units of the National Park System. Funds are allocated among the units of the system as needed to best achieve preservation and public service objectives. NPS provides assistance at the pilgrimage because it is a significant public event related to the purpose of the site. Continued NPS support for this event is part of the proposed plan.

We are not aware of damage to the site resulting from activities related to the Manzanar Pilgrimage.

Department of Landscape Architecture
College of Agricultural Sciences and Natural Resources

Box 42121
Lubbock, TX 79409-2121
(806) 742-2858
FAX (806) 742-0770

March 20, 1996

Manzanar National Historic Site
Superintendent
P.O. Box 426
Independence, CA 93526

To Whom It May Concern:

Having used the Manzanar site as a design studio project in the Department of Landscape Architecture at Texas Tech University. I am keenly aware of the key issues concerning potential developmental actions at the site. It was a pleasure to review the draft general management plan dated December 1995. The following issues or concerns are central to potential development of the site.

I will use an outline format to express my concerns. There are, however, 2 overall issues that are important. First, will a vegetation management plan be developed for the site - in other words, what will the site look like in 5, 20 and 50 years? This is in my opinion a central issue that needs comprehensive discussion. Secondly, how will surface damage issues be handled, i.e. the extensive erosion/deposits of silt that has occurred over the years?

Issue #1: How will the golf course - its image on the landscape be preserved? There is no discussion of that land use.

Issue #2: Clearing of vegetation to outline the roads is acceptable. However, clearing of "fire break"/recreation open space is questionable. Maybe better managed as a single plant type - rabbit brush to outline pattern on landscape - rebirth of life philosophy of plants.

Issue #3: "Guard Tower" as a landscape feature careful consideration due to potential opposition to this type of architectural structure.

Issue #4: Alternative "A" - is not an alternative based on legislative requirements.

Issue #5: Alternative "B" - consideration of groundwater pollution from automobiles into underground aquifers must be considered - high water tables and well drained soils.

March 20, 1996

Issue #6: Alternatives "B" & "C" - some gardens have been so altered by erosion, i.e. Merritt Park, maybe best management practice is let nature continue its natural healing process. No preservation.

6

Issue #7: Alternatives "B" & "C" - several large/major gullies/erosion corridors have developed over site - how will they be handled - filled in/regraded or what. Should they be left to cut through man-made grid of camp - philosophical questions of design and management.

7

Issue #8: Alternative "C" - location of parking lot by cemetery from a design point of view is questionable. Spatial lineage to site is broken - better located at side.

8

Issue #9: Alternative "C" - It's questionable if a shuttle system is required. The site is not that large that a visitor could not walk and get an excellent understanding of site history. Having walked the site, many times one can easily travel, say 15 to 20 minutes from cemetery, or stone guard houses, etc and get an excellent education about site history.

9

Issue # 10: Utilities - The design and location of the water tank will be critical, especially with low/open landscape character of the Owens Valley.

10

Issue #11: Rejected Alternatives - The mural idea may have merit as an entry element to Visitor Center in the de-compression area between V.C. and parking - don't throw it out yet.

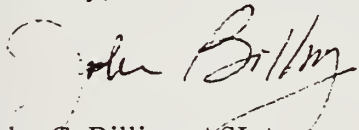
11

In conclusion, the management plan potential lacks an environmental/design philosophical basis, except for the legislation. One potential could develop a management plan based on the idea, "rebirth of life", etc. where some parts are allowed to follow a natural process and return to a natural landscape setting.

12

Hopefully, these comments will be of help in development of a management plan for Manzanar. If you have any questions or concerns, please contact me.

Sincerely,



John C. Billing, ASLA
Associate Professor

RESPONSE TO JOHN BILLINGS

1. The golf course is one of many features which will be interpreted at the site. The means of interpretation will be determined at a later planning stage when interpretive planning is undertaken. Remaining physical evidence of the golf course is limited and we would not foresee efforts to physically restore it as a feature of the cultural landscape. Interpretation could incorporate historic photos and drawings in wayside exhibits.
2. There is no intention to clear the firebreak areas of vegetation. Rather the objective is to retain the low desert vegetation cover which is native to the area and which will allow interpretation of the layout while avoiding exposure of the soil to the wind.
3. A reconstructed guardtower will be a useful interpretive tool in explaining the layout and character of the camp and is proposed in the final plan. The controversy has centered on differing memories regarding the presence of guard towers at Manzanar. As historical research is completed and sufficient historic documentation is assembled, the controversy should dissipate and sufficient information should be available to guide accurate reconstruction.
4. Alternative A, No Action, does not achieve the goals of the legislation but is required by federal regulations to implement the National Environmental Policy Act as a baseline against which the "action" alternatives are measured.
5. The proposed plan includes a shuttle plan which should have the effect of reducing the amount of vehicle use on the site. Beyond this, there is no practical means of completely eliminating minor fuel and oil drips and spills. However, the contribution of onsite driving to the overall vehicle impacts on groundwater quality in the Owens Valley is minuscule, particularly considering that drainage from major highway routes such as U.S. 395 (several million vehicles per year) eventually enters the groundwater system.
6. We agree that not all gardens can or should be restored or rehabilitated. Some such sites can best be interpreted through the use of historic photos at waysides, others may be completely restored, and yet others may be somewhere in between. The plan calls for the use of a committee consisting of internees, landscape architects, and historians to recommend gardens for restoration and rehabilitation.
7. The basic organizing principle for the site is preservation/restoration of the primary elements of the WWII cultural landscape. This will require that efforts be made to significantly reduce erosion on the site. A water management plan is proposed to be developed with LADWP to regulate runoff onto the area. This plan, along with an assessment of cultural resource values, will help to determine what treatments should be undertaken to deal with past erosion. In some areas it may be appropriate to restore the camp-area contours, while in other areas it may not.

8. The parking configuration at the cemetery is conceptual and can be adjusted during the design process. The location shown is an already-disturbed site which has worked well over the past several years in serving the annual Manzanar Pilgrimage. There are cultural resources located to the north and south of the cemetery which may be limiting.

9. While we agree that able-bodied visitors will have little difficulty accessing the site by foot from the proposed road and parking areas, the shuttle would, especially in the next few years, be extremely useful in facilitating the visits of elderly former internees to the area. It is also seen as a means of reducing traffic flows, and resulting impacts, and demands for larger parking lots in peak visitation periods.

10. We agree that location of the tank is important. To avoid adverse impact on the historic landscape, the needed tanks and pumps will be located underground.

11. The proposed scale and location of the mural was unacceptable because it would significantly alter and detract from the historic scene. The proposed content of the mural also is problematic because the broad sweep of Japanese American history is not the primary subject of the site but rather a supporting theme to be used to explain the relocation program. A small-scale mural with the content as proposed might be appropriately located in the interpretive center and could be considered as interpretive planning is undertaken.

12. The legislation establishes the purpose and basis for the site. The GMP's basic organizing principle for design at the site is preservation/restoration of the WWII cultural landscape. This implements the basic direction of the legislation, which establishes the site as a national area based on its significance as an element of the Pacific Campaign of WWII. This general organizing principle will be further translated through more specific planning and design efforts on the site.

We agree that it is desirable to help the visitor to capture and retain some vivid and memorable impressions beyond the purely factual. "Rebirth of life", for example, is one idea which could be developed. This concept is already suggested in the "Desert Processes" wayside concept, which would show the return of the desert on a portion of the camp. Other concepts which might be developed in the interpretive program include the contrasts between the natural beauty of the setting and the starkness of the camp, the contrasts between the institutional barrenness of the camp when opened and its "humanizing" through the landscaping efforts of the internees, and the recurring episodes of eviction and resettlement which have characterized Manzanar's history.

GEORGE KITAZAWA
926 HARVARD ROAD
MONROEVILLE, PA 15146

April 10, 1996

Superintendent
Manzanar National Historic Site
P.O. Box 426
Independence, CA 93526-0426

Dear Superintendent:

Thank you for sending me the Draft of the General Management Plan and Environmental Impact Statement. Earlier I had received a Summary from your San Francisco office.

As an inmate of the Manzanar camp for a brief period in 1942-43, I read your Draft with great interest and would like to offer several suggestions. The maps do not show a library which the site did have with librarians. If such a barrack library could be considered, then the art objects created by the inmates and artifacts could also be displayed in this library, apart from the concessionary areas.

I notice on the map that there is a guayule lath-house or plantation in the west corner of the camp where the original guayule project was located. This project consisted of two parts, the guayule nursery and the guayule research laboratory. Dr. Robert Emerson, a world class scientist at the California Institute of Technology, initiated this project with the full cooperation of WRA. He believed that the technical and scientific talents of the inmates be fully utilized for the war effort. When Japan cut off our supply of hevea rubber at the start of the war, a national rubber emergency program was instituted to explore means to replace the lost supply so vitally needed for the war effort and the civilian economy. The guayule bush produced a rubber latex whose quality was the equivalent of hevea rubber. The assembled team in their laboratory, a former shower/laundry room, was to look into the genetic makeup of guayule and the physical and chemical extraction of the rubber and to relate this information back to selected stock in the nursery to produce a superior rubber producing plant. It became a grandiose objective when the camp closed down early. Still the courageous effort of Dr. Emerson and others in setting up and equipping the research laboratory and the history of the project should not be overlooked. My wife and I were fortunate to be members of this research team.

On page 43 under Vegetation and Wildlife note is made of fruit trees "in small groves located in firebreaks". Actually there were no fruit trees in the firebreaks of the Manzanar camp. The firebreaks had been cleared of all vegetation and were the sources of much dust during windy days. When we arrived in Manzanar from the Santa Anita camp, we were assigned to Block 28 below the hospital in the north corner of the camp. I remember to this day what loving care the contractor must have taken in preventing damage to the trees in the erection of the barracks, considering some trees were smack against the barracks. I was courting my wife-to-be and we were married in early April during apple blossom time. It was just beautiful with

blossoms festooning the barrack chapel. ~~I believe that Block 28 was the only or one of a few blocks that had fruit trees so what trees are left today are the remanent trees below the old hospital site.~~

Concern is expressed in the Draft that the people traveling U.S. Highway 395 who may stop briefly at Manzanar may not know what this site was all about without the background information. I would suggest as a starter that the Manzanar site be designated a "U.S. Concentration Camp" which it was. No mention of concentration camp is made in the draft. I believe one of the memorial plaques installed by the State of California refers to the site as a concentration camp. To ignore the psychological impact on the inmates is to ignore history. The Germans have done well in this by retaining their concentration camps. I would hate to see the Manzanar site "Disney-fied".

I again appreciate receiving the Draft. If I can be of any help on providing further information on the Manzanar NHS, please let me know.

Sincerely yours,

George Kitazawa

GEORGE KITAZAWA
926 HARVARD ROAD
MONROEVILLE, PA 15146

April 15, 1996

[Handwritten signature]
4/19/96

Superintendent
Manzanar National Historic Site
P.O. Box 426
Independence, CA 93526-0426

Dear Superintendent:

This is a follow-up on my letter of April 10 commenting on the Draft of the Plan for the Manzanar NHS. When I was writing the earlier letter to you, I was looking for an article on the guayule project. I found it yesterday. The article is titled "As the Guayule Ball Bounces" and is taken from the September 1977 issue of a Southern CA automobile club magazine, Westways. My middle daughter came across it when she was in her residency at the UCLA Medical Center. During her childhood and youth she must have heard us talk about the guayule project. She sent the article underlining my name. Dr. Shimpei Nishimura and Mr. Hugh Anderson would be good sources for information on the guayule project. The chemical or research laboratory was headed by Dr. Kenzi Nozaki, now retired in El Cerrito, CA after a long career with Shell.

Looking at the map again, I am puzzled about the kendo dojo and the judo dojo. I do not recall such dojos at Manzanar but as Manzanar will become an amalgam of the ten concentration camps, the dojos were probably at another camp or camps. The bare minimum for a judo dojo would be a heavy floor mat. On the other hand, kendo does require considerable body and head protection and therefore it would seem rather unlikely that such protective gear was present at the site or would have been shipped to the camp. As you may know, the inmates could not have cameras, radios, newspapers and other items. Thought-control was certainly imposed on the inmates.

A camouflage factory is shown on the map. I assume this refers to camouflage nets. There was no camouflage net project at Manzanar so it may have been at another camp. At the Santa Anita camp the Army had a camouflage net project in the main grandstand with its high roof. Long net racks were suspended from the ceiling by a pulley and rope system which enabled the two hoisters to raise or lower the rack to which the large net was fastened. There were many racks; it was a large project. I was a hoister. The weavers were young women, most of whom were fresh off the farms with a strong work ethic. Although everyone on the project was a volunteer, these girls worked with dispatch as though their lives depended on it. This camouflage net operation for the brief period of its existence was undoubtedly the most productive in the U.S. In view of the munificent salaries of \$8 per month for weavers, \$12 for hoisters and \$16 for foremen, productivity had to be high. Frankly, I enjoyed this period in the grandstand as it gave me an insight into camouflage net people and the various aspects of camp work life.

I question the kendo dojo. In its place I would suggest the Manzanar library. For the guayule project I would suggest the addition of the research laboratory, probably the only one in the ten camps. It should be noted that the nursery was for research use, not a plantation for the commercial production of rubber. 1,2

I wish you success on the Manzanar NHS.

Sincerely yours,

George Kitozawa

RESPONSE TO GEORGE KITAZAWA

1. We have a number of historic photos of both the exterior and interior of the library, which was located in Building 15, Block 22. We would expect to show the library location on interpretive guides and possibly provide a wayside exhibit at the site. However, we do not believe reconstruction of the library as suggested, with the extensive upgrading and environmental controls necessary to display original artwork, would be feasible.
2. We agree that the guayule project is an interesting aspect of Manzanar and opportunities for interpretation of both the nursery and the laboratory will be explored when interpretive planning is undertaken. A wayside exhibit in the vicinity of the project features, using historic photos and possibly some guayule plants, would be one way to interpret this. We appreciate the material on the guayule project provided with your letter.
3. We will further research the location of the remnant orchards and revise the text as appropriate.
4. When the plan is implemented and the site is operational, visitors will have a clear idea of the purpose of the area and how the site operated. We believe that a factual, historically accurate presentation is essential at Manzanar.
5. The subject dojos are noted on the plot plan printed in the spring of 1945 by the War Relocation Authority. We know through historic photos and onsite inspection that the judo dojo existed at its marked location. Additional research is needed and will be accomplished regarding the kendo dojo.
6. Our historic research, both written materials and historic photos, indicate that there was a camouflage net project at Manzanar during the first few months of the camp's existence.

U. S. Department of the Interior
National Park Service
Stanley Albright, Western Regional Director
600 Harrison Street Suite 600
San Francisco, Ca. 94107—1372

PAH-2/26/96

Feb. 16, 1996

sub: Manzanar Historic Site Management Plan

Mr. Albright:

Appreciate your office sending me a copy of your General Management Plan of the Manzanar National Historic Site dated Dec. 1995.

I've reviewed the plan in great detail. The "A" section, which is a do nothing description is without question your best alternative of the (3) plans your office is putting forth.

I noticed you repeatedly use the term Internee, Interned and Internment Camp in describing Manzanar. You should be and your staff should be well aware those terms only apply to the Crystal City, Texas Internment Camp and Tule Lake Internment Camp. The W.R.A. and Military directives clearly state the Relocation Centers are not Internment Camps. Those of Japanese descent could and did leave as they wished after signing the loyalty oath.

The Manzanar Free Press dated March 1943, edited by persons of Japanese descent located in Manzanar do not refer to the camp as an Internment Camp.

Your office should show some creditability and not make room for the un-approved Manzanar Concentration Camp marker and the 442nd RCT maker. The regiment did a fine job for the 11 months it was overseas but the unit records do not support the claims being made by those of Japanese ancestry.

Your book describing the Manzanar Management Plan mentions the Manzanar Commission as having input directed at your plan. The Charter authorizing the existence of a Manzanar Commission requires (11) persons be appointed and to represent 4 groups of people consisting of former internees, local residents, representatives of Native American groups and members of the general public. The 4 groups would average 2.75 persons from each group. WHY HAVE YOU APPOINTED 5 PERSONS FROM THE JAPANESE ANCESTRY GROUP?

The plans identified B and C border on TREASON. Parts of Plan B & C do not border on Treason but are TREASONOUS. I guess those of Japanese descent whom were small children during the WW II years and seem to be the Park Service guide in re-constructing Manzanar are very happy the've convinced the Park Service of some of the biggest lies in history.

The scheduled location of the last (2) hearing places fall into the lap of The Japanese Cultural Center organization. This group is excercising very strong efforts in the Hawaiian Islands to change history to show the Japanese race as heros during WW II and the United States as the agressor. Guess what/ their audiences at shopping malls etc. being almost all younger than the WW II
con't

11

2

3

4

U. S. Dept of the Interior
Stanly Albright Regional Director.
Feb 16, 1996
con't from page 1

generation have had the false message repeated to them over and over for so many years they now believe the false message is true.

A similiar effort has been going on in the U.S. since WW II, especially in California and it's been obviously successful. The Park Service in California, Hawaii, Saipan and other locations seem to believe those persons of Japanese descent without questioning them. The U. S. Park Service proves their un-American attitude when caucasian-Americans visit those places.

The Park Service is heading in the wrong un-American direction that will wind up in several resignations along with another ENOLA-GAY incident. The momentum towards this end result has already started and will continue to get stronger and stronger.

Best regards

W. W. Hastings
W. W. Hastings
619-873-3652



copy to;

Mr. Ross Hopkins Manzanar Park Superintendent
Mr. Bruce Babbitt, Secretary of the Interior
Mr. Jerry Lewis, Congressman
Robert Dole, Senate Majority Leader
Newt Gingrich, Speaker of the House
Gerald Solomon, Represenative, Chairman House Rules Committee.
John McCain of Arizona, Senator
Phil Crane of Illinois, Congressman
John Doolittle of Calif. Congressman
Phil Gramm Texas, Senator
Rod Grams New Mexico, Senator
Bill Archer, Congressman, House Ways & Means Committee
Ed Feulner Jr. Heritage Foundation, President
National Republican Congressional Committee, Wash. D.C.
David A Keene The American Conservative Union, Chairman
V.F.W. Political Action Committee
Disabled American Veterans Headquarter.
Gilbert M. Hair, Center For Civilian Internee Rights Inc. Executive Dir.
Lillian Baker, Historian
Robert M. Garrick, Rear Admiral USNR (Ret)
William J. Hopwood, CDR USNR (Ret)
Edgar C. Doleman Lt. Gen. U.S. Army (Ret)
Pete Domenici Senator and Congressman John Kasich, Budget Committee.

RESPONSE TO WILLIAM HASTINGS

1. While we recognize the limited application of the term "internment" in a legal context, it is accurate in a generic sense in describing the treatment of Japanese Americans in the relocation program.

2. The state historical marker erected at the entrance to the camp was placed there in 1973 by the State of California, nineteen years prior to designation of the site as a unit of the National Park System. The Blue Star Memorial marker was erected in 1994 by the California Garden Clubs, in cooperation with CALTRANS, to honor those who have served in the armed forces of the U.S.. We can assure you that any information which may be presented by the Park Service about the 100th BN./442nd Regimental Combat Team and the Military Intelligence Service will come from sound and reliable sources such as unit histories, The Infantry Journal, and other scholarly publications on WWII military history. We do not base interpretation on hearsay and anecdotal allegations.

3. All of the groups specified in the legislation are represented on the commission. The law does not require proportional representation. It should be noted that an effort was made to locate commission candidates with a broad range of backgrounds and capabilities related to establishment and effective management of the Manzanar site. In this regard, the Japanese American and American Indian members were selected not only on the basis of ethnicity and personal history but because of their knowledge in fields such as landscape architecture, history, and education, and because of their positions as respected community leaders and representatives.

4. We do not understand the references to treason in the general management plan and would welcome a more focused explanation of your concerns in this regard, along with any suggestions for revision of text. Overall, we believe your concerns about the content of the interpretive program at Manzanar are premature. When we begin to create displays and other interpretive materials for the site, we will actively seek public review and critiques with a view toward ensuring factual, balanced, and credible presentations.

Regarding the comments about Park Service interpretation at other World War II related areas, we believe your impressions are unfounded. The Park Service staffs at those sites would welcome any specific comments or suggestions you might have toward correcting misinformation or improving the interpretive program generally.

PETER A. KREIDER

1031 OAKMONT CT.

NAPA, CA 94559

(707) 224-2800

E-Mail Address:

70324.2421@COMPUSERVE.COM

April 18, 1996

Mr. ROSS HOPKINS, Superintendent,
Manzanar National Historic Site
P. O. Box 426
Independence, CA 93526-0426

Subject: Comments regarding The General Management Plan Draft for the
Manzanar National Historic Site.

References:

1. The General Management Plan of December, 1995.
2. Letter to Ross Hopkins, Superintendent, from Susan Chaffey Powell, dated February 17, 1996.
3. Letter to Ross Hopkins, Superintendent, from Frances Kreider Rowe, dated March 5, 1996.

Dear ROSS,

My comments on the Plan for the Manzanar National Historic Site are in 2 groups, I. General Comments, and II. Specific Comments. I call your attention particularly II-B, C, D and E which may involve addition to the plan.

I. GENERAL COMMENTS

My own views echo those of Reference #2 & #3 by my cousin, Susan Chaffey Powell, and my sister, Frances Kreider Rowe. We all recommend "ALTERNATIVE C: ENHANCED VISITOR EXPERIENCE".

As Susan Powell wrote, "ALTERNATIVE A: NO ACTION is unacceptable". The area has been named a National Historic Site. To do nothing flies in the face of the Congressional Mandate, and the area would continue to revert to faceless desert. "ALTERNATIVE B: MINIMUM REQUIREMENTS" is better than no action, but involves significant expense without providing reconstitution of the site, or on-going maintenance, and excludes interpretation of the unique periods that have occurred there.

Alternative "C" is important, as it will preserve the prescribed area of the Manzanar National Historic Site. And in publications and exhibits in the Interpretative Center, "C" can also preserve the historic heritage of the surrounding area that involved Native Americans and the Orchard Community.

II. SPECIFIC COMMENTS

A. COORDINATION BETWEEN ECM & MANZANAR NHS

I fully endorse the plan's extensive interaction with the Eastern California Museum in Independence. At the Manzanar Interpretative Center, utilizing appropriate selections from the Museum's continually expanding Owen Valley history makes good sense. Having the museum as a repository for exhibit materials not in use at the Interpretative Center fits the Museum's basic charter as a permanent display and archival center for Eastern California historical facts and artifacts. The Museum helping the Manzanar Historic Site and the Site helping the museum, provides a synergistic result, and prevents duplication and/or competition for exhibit materials.

B. MANZANAR'S HISTORICAL PHASES--

The Park Service's explorations of Manzanar have led to describing its history in 3 periods: a) The "Pre-white man Native American Centuries", b) The "Anglo-American Period" from John Shepherd's homesteading in the 1860's, to the beginning of WW II, and c) The Japanese Camp period.

I submit that the "Anglo-American Period" should be broken into several periods each of which had a totally different objective. This would increase the distinct historical periods for Manzanar to six as follows:

- 1) *Native American Centuries*—(From prehistoric times to the 1870's).
- 2) *Pioneer Homestead Period*—(1860's-1905). Homestead ranches by John Shepherd and a few others—Cattle, a few orchards & truck crops, and limited irrigation.
- 2) *Manzanar, the Orchard Community*—(1905-1934). George Chaffey, laid out, organized, and established a successful orchard community with formal subdivision and with water distributed to all the parcels. This period ended in 1934 when the LADWP abandoned all farming after having already purchased nearly all of the Manzanar Orchard land for its water rights,.
- 4) *First Abandonment*—(1934 to 1942). LADWP stopped all farming, closed down the irrigation system, removed all buildings, abandoned the dedicated roads, and let the area begin to revert to its native desert state.
- 5) *Japanese Relocation Camp*—(1942-1945). This, well documented period, and the basis for the National Historic Site, interrupted the LADWP abandonment. The US Army built a new water system which utilized portions of the old Chaffey irrigation system, and water was supplied for both domestic camp use and for irrigating revitalized old orchards and crops planted and tended by the internees.

- 6) ***Second Abandonment—(1945-present).*** After the war when the camp was dismantled, and with LA still owning the land, LADWP resumed letting the area revert to desert. This "Second Abandonment" continues to this day. Only the National Historic Site offers a possibility of preserving a portion of the area. In any case, the rest of the Manzanar Orchard area will continue to revert to desert.

I strongly recommend that the "Anglo American Period" be divided into the above 4 distinct periods for proper recognition of each.

C. INCREASED RECOGNITION OF THE "ORCHARD PERIOD"

The Plan slights the "Orchard Period". There is no question that the "*Japanese Period*" should receive the emphasis it is being given, and, in my view, the "*Pre-white man*" Native American era is adequately recognized. However, the "*Orchard Period*" is hardly mentioned. Yet, this was the only period of Manzanar's history that involved a productive community.

In due course those of us with roots to the Manzanar Orchard era will have collected information to supplement that by NPS and the combination will allow a substantiated history of the period to be prepared. Jane Wehrey has already done excellent data gathering and writing about this period and her work continues. My sister, several of our Chaffey cousins, and I, as time permits, continue to accumulate documentation on the Orchard Period. But we all reside in the San Francisco Bay Area, some 400 miles and across the Sierras from Manzanar, and it is difficult for us to spend the time in the Valley needed to pursue the data gathering on a timely basis.

The "*Orchard Period*" needs to be given increased recognition in planning the National Historic Site, and with information still evolving, the specific plans for documentation and exhibits should be kept flexible to accommodate changes as you and we gather and document more substantiated historical details. (*It's likely some of the documentation being prepared by NPS will help fill in the story of the "Orchard Period"*)

D. SEVERAL POINTS REGARDING THE "ORCHARD PERIOD".

1) ***THIS IS WHEN ITS GOT ITS NAME.*** Someone came up with the Manzanar name when George Chaffey was planning the irrigation colony. He liked it and applied it to the area because it was Spanish for the Apple Orchards he knew would thrive there. He started the orchard community in 1905 by buying the Shepherd Ranch. (As deeds show, it was purchased for him by his younger brother Charles Francis Chaffey, and transferred to George a few months later.) George Chaffey was a well known pioneer developer of successful irrigated agricultural communities both in California and Australia. He recognized the existence of adequate water sources in the Sierra streams. The Shepherd Ranch orchards

showed, and his own tests confirmed, that the area's soil would be productive for farming if given water. The climate with its copious sun and frosty winters was ideal for apples, which also are modest in their water needs. Further, he was an expert at water collection and distribution for agriculture in arid lands. (Water rights to Shepherd and Bair's creeks came with the Shepherd Ranch.)

2) *THE MANZANAR SUBDIVISION AND WATER SYSTEM.* After George Chaffey owned the Shepherd Ranch (Approximately 1360 acres), and he, other family members and associates had purchased adjoining acreage, for a total of some 3,000 acres, he formed "Sierra Securities Co. Inc." in 1906 with himself as president to start the Manzanar subdivision. The Chaffey group sold/transferred their Manzanar land holdings to Sierra Securities. (Deeds in the Inyo County Recorder's office, most dated 1906, show this.) Sierra Securities was a financing and planning organization with banking connections. Under Sierra Securities, Chaffey had the planning and surveying done for the subsequent subdivision and water system, and also started initial work on the Manzanar irrigation system.

3) *OWENS VALLEY IMPROVEMENT CO.*--In 1910 Chaffey formed the Owens Valley Improvement Co. Inc. (OVI), and it became the operating company for Manzanar. Inyo County deed records show that Sierra Securities sold/transferred its Manzanar holdings to OVI in 1910. The same year, OVI applied for and was granted a recorded Inyo County agricultural and townsite subdivision, after which OVI began the sale of ranches and town lots. OVI completed the irrigation system which collected water from Bair's and Shepherd creeks and distributed it to the ranch parcels and townsite lots through concrete piping. OVI did some orchard planting of its own in addition to selling the bare parcels with water.

4) *MANZANAR, THE LAND OF RED APPLES* By 1915 Manzanar was becoming a thriving Orchard Community, primarily apples, and its peak orchard years were probably around 1920-22. As Washington is today, Manzanar was noted for its excellent apples. From around 1915 to 1934 Manzanar was productive, and its premium apples were sold in California and Western Nevada. In the teens, Manzanar was getting its own small business area which in due course included a store, community hall, school, garage, lumber yard, cannery, packing house, and an ice cream stand on the highway. Independence, the Inyo County Seat just to the north and Lone Pine a few miles to the south, each had business districts, so there was no need for Manzanar to have major commercial activities.

5) *THE END WAS NEAR*--In 1924 Los Angeles began buying up the ranches (Including our father's) for the water rights, and by 1927 owned all of Manzanar. OVI continued operations until 1924--offering parcels, maintaining the roads, overseeing the Manzanar Water Company's operation of the irrigation system, managing orchards for absentee ranch owners. etc. At that point George Chaffey and the City of Los Angeles finally settled their 20 year court battle over several disputed Owens Valley water rights. In a single settlement Chaffey, then 76 years

old, relinquished his claims in return for a satisfactory purchase price by Los Angeles of the Chaffey interests at Manzanar. (OVI Inc. was terminated in 1927.)

The City continued farming the Manzanar ranches until 1934 when they decided they needed the Manzanar water for Los Angeles, and abandoned the ranches and orchards. This brought the productive "*Orchard Period*" to a close and the "*First Abandonment*" began.

6) **THE MISUNDERSTOOD GHOST ORCHARD COMMUNITY**—Manzanar is often considered a failure by those who don't know the facts. After all, it no longer exists and LADWP purposely allowed the area revert to desert. However, the important point is that Manzanar was a successful agricultural venture and thriving farming area for 20+ years. If the City had not bought up all the ranches for the water rights, the productive Orchard area would have likely expanded beyond the original 3,000 acres, and Manzanar would probably be producing apples today. (If that had happened, no doubt the Japanese Relocation Camp would have been located elsewhere.)

The fact that Los Angeles bought up all the ranches for the water in no way reflects on Manzanar as a successful endeavor. It was successful, but had its life ended prematurely through no fault of its own.

7) **CHOOSING A SITE FOR THE RELOCATION CAMP**--It is probable that the remaining withered fruit trees and the existence of the old Manzanar water system influenced the US Army to select this as the site for the Relocation Camp. Otherwise why was it chosen from among the many other possible locations east of the Sierras? The fact that the land was all owned by one governmental entity, Los Angeles, may have contributed to this decision.

8) **THE ORCHARD PERIOD DESERVES RECOGNITION**--Because the successful "*Orchard Period*" made an major contribution to, and is an important component to Manzanar's history, it deserves adequate recognition in the National Historic Site planning, and needs to finally be properly documented in the histories which the National Park Service is preparing. Even though it was killed by the need for LA water, the apple producing period was the most illustrious time in Manzanar's history.

None of this should displace any emphasis about the Japanese and Native American periods, but as a minimum there should be "Orchard Period" displays in the Manzanar Interpretative Center, and a booklet or book describing the Period--its origin; its people, their work and social life; its irrigation system with water to each parcel; its thriving orchards; its notable apples; and like all farming areas, the vagaries of the weather.. In short, its major contribution to the area's history should be more fully recognized.

[NOTE: The NPS Denver Center is preparing a document about all aspects of the Manzanar Japanese Relocation Center. I have seen an early unedited draft of a

Section of this document titled "Historical Overview of Manzanar". A portion of this section describes the Orchard Community, and is by far the best, most detailed and correct write-up done on the subject. (This early draft had grossly wrong information about George Chaffey's background, but believe this will be corrected.) The Orchard Period information in this section of the document can be a significant aid to the NPS Manzanar NHS Plans for recognizing the Manzanar Community, and can form the basis for a book or booklet about it.]

E. "ORCHARD PERIOD" REPRESENTATION

Both the Japanese and the Native American Period have representatives on the several steering and planning committees for the National Historic Site, which is as it should be. However, conspicuous by its absence, no one represents the productive Orchard Period. I strongly recommend this be remedied and I offer a worthy candidate, **MRS. JANE WEHREY**. You know Jane Wehrey, if not directly, certainly from her writing and research into Manzanar History for the National Park Service.

Very few folks are still alive who remember the Orchard Period directly by having been at Manzanar. The few that are still at hand, are beyond the age to be active on NPS committees.

Jane Wehrey is eminently qualified to represent the "*Orchard Period*". She was born and spent much of her youth in Owens Valley; her maternal grandparents owned the Manzanar General Store (The Banhauers), and she, of course, is active in the historical research about Manzanar for the Park Service. She was a Valley resident and has many long standing friends in the Valley, yet she has a very good neutral view of the "Valley vs. The City" conflicts and feelings. Further, she is a supporter of the National Historic Site.

F. MANZANAR ROOTS

My, and my sister, Frances', roots find connection and meaning in Manzanar. Our great uncle was George Chaffey, the Manzanar founder, and our mother, his niece, met our father there on his ranch. She was a driver for her uncle in the late teens and early 20's when he was in his seventies, and he frequently went from his home in the LA Basin to Manzanar to confer with his on-site OVI Co. manager. Both our parents loved Manzanar, but never lived there after their marriage as our father had sold his ranch to Los Angeles before their wedding in 1925.

They settled in Long Beach where our father was in the Fire Department for many years, but our family went to Owens Valley frequently. By the time I can remember things (1929-30), our father's ranch was abandoned, but we often stopped there in the early 1930's. I remember his ranch house and the trees which were still bearing some apples even without irrigation water. When we went to Owens Valley, our parents visited old friends in Lone Pine and Independence, and

in the early 30's, some still lived on Manzanar ranches. Thus, the Manzanar Orchard Community is engraved in our heritage.

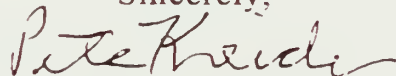
G. CONCLUDING REMARKS

I would like to note, with the historical perspective of 70 years since the Manzanar orchards were bought by The City, we have no regrets about the orchard history. In a broad overall Owens Valley sense, LADWP's ownership of so much of the valley and their management policy of keeping their lands open to the public has done much to allow the valley to remain the wonderful land at the foot of the Sierras it was from its earliest. We the public can continue to enjoy it pretty much as it was originally.

Where else in California, outside of National Parks, has such a picturesque land been allowed to remain as it was? The alternative would have been, at best, ranches with "No Trespassing" signs like most of the rest of the State's agricultural areas, or worse, housing subdivisions. The Manzanar National Historic Site will fit nicely in this environment. The Valley's natural wonders will be enhanced by public information made available about Manzanar's history, both its productive and its infamous times.

This concludes my comments on the Manzanar General Plan, and presents an outline of the facts needed to substantiate why the Orchard Period should be broken out of the catch-all "Anglo-American Period" and receive increased recognition. I appreciate this opportunity to comment on the plan. Please feel free to contact me at any time with regard to any of the above. (My Postal, E-Mail addresses, and phone are in the letterhead.)

Sincerely,



Peter A. Kreider

cc: Bob Ellingwood, President of the George Chaffey Society
P.O. Box 9476
Ontario, CA 91762

Bill Michael, Director
Eastern California Museum
155 N. Grant St., P.O. Box 206
Independence, CA 93526

Marty & Susan Chaffey Powell
2113 Alejandro Dr.
Santa Rosa, CA 95405

Frances Kreider Rowe
2840 Regent St.
Berkeley, CA 94705

Jane Wehrey
2912 Leopold Ave.
Hacienda Heights, CA 91745

RESPONSE TO PETER KREIDER

1. We agree that a further subdivision of the Anglo-American period will be needed in developing interpretive materials for the site. It's important to recognize that the general management plan establishes a broad framework for management, with many of the details left to later planning and design stages. The subdivisions you suggest will be given very careful consideration when more detailed interpretive planning is undertaken.
2. We agree that the "Orchard Period" is an important and very interesting part of the history of Manzanar and have no intention of slighting this period in the interpretive program. The archeological surveys have identified a number of sites within the park associated with this era in Manzanar's history, and we are accumulating a considerable amount of information on this period. We should have a wealth of material on which to base wayside exhibits and other interpretive materials.
3. We appreciate the information and perspective offered here on the orchard period.
4. We agree that it would be desirable to have a member of the advisory commission who is knowledgeable of the orchard era and who can represent the concerns of others in this regard. At such time as a vacancy occurs on the commission, we will give every consideration to recommending Jane Wehrey for the position. In the meantime, we will continue to seek advice and assistance from Ms. Wehrey and others in interpreting the orchard era.

ADD
3/3/96

8014 Dorinda Ave.
Las Vegas, NV 89117
1 May 96

Ross Hopkins, Superintendent
Manzanar National Historic Site
P.O. Box 426
Independence, CA 93526-0426

Dear Mr. Hopkins:

In brief, I fully support Alternative C. Enhanced Visitor Experience.

The expanded boundary to protect and to allow for interpretation of the military police area, the chicken ranch, and additional cultural resources related to the internment period is especially important. If this cannot be acquired in fee simple, at least manage it as part of the Historic Site under a long term agreement.

I support the Plans premise that the Native American, the ranching/townsite, and internment stories all being interpreted. However the reason this area was established was due to being the site of Japanese-American internment during World War II and being representative of all such sites that existed. Thus when the time comes to allocate exhibit space, A/V time, and etc. the Japanese- American story must take the dominate role.

Along this line I suggest the following sentence or something similar be added: "As the primary theme of the Historic Site is the Internment of Japanese-Americans during the period of March 1942 and November(?) 1945 that only structures, roads, trails, and equipment existing (or used) within that time frame be considered to be returned to the site, reconstructed, or rebuilt". This would provide Management a tool to maintain the appropriate historic scene. While, for example, it would be interesting to interpret or show in exhibits or other media a structure in the 1920's townsite of Manzanar it may be totally inappropriate to bring the building back on site unless it was also there in the 1942-1945 era.

The choice of Blocks 8 & 14 for the demonstration seems wise due to their distance from the distracting traffic on Highway 395. Also site traffic could circulate around the auditorium to the east allowing visitors to walk from the auditorium to the demonstration blocks without crossing traffic. I noted in Alternative B, Block 13 was listed as the demonstration site. There is no explanation as to why. It would seem Blocks 8 & 14 offer the best for interpretation in any option. Perhaps the rationale needs some explanation.

Also I do not see any rationale for the difference between the Alternatives of whether or not Manzanar be managed as an independent unit or be affiliated with Death Valley. In the spirit of cooperation, cost savings, and efficiency it would seem better to see Manzanar affiliated with Death Valley. The caveat is that Manzanar gets the necessary assistance from the host Park and is not short changed and that the Superintendent of Manzanar have the same level of authority and access to decision makers whether he reports to a Area Director and a higher level Superintendent. Is this a GMP issue or is this something the Secretaries Advisory Board could make recommendations on if and when changes are needed.?

I am please to see a section on Partnerships and especially the proposed relationship with the Eastern Sierra Museum as it relates to museum objects. I also applaud the concept of a shuttle system when needed.

Again, I fully support the preferred Alternative "C" and commend the team for putting together a fine document. Manzanar is an important part of our Nations historical and political development and the internment story of World War II needs to be preserved lest we someday forget.

Sincerely,



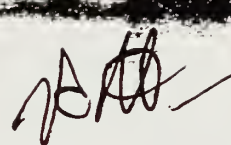
Edwin L. Rothfuss

RESPONSE TO ED ROTHFUSS

1. Legislation to authorize a boundary of 800 acres is in process and is expected to be enacted into law. This expanded area does not include a number of more remote historic features of the camp such as the reservoir. However, we intend to work with the appropriate public land managers, including BLM, LADWP, and CALTRANS, to encourage the protection and interpretation of these features.
2. We agree. The intention to manage Manzanar as a cultural landscape relating to the WWII internment camp era was stated in the draft plan and has been restated, clarified, and further emphasized in the final plan.
3. The final plan proposes the use of Blocks 8 and 14 for demonstration blocks.
4. We do not believe this is necessarily an issue requiring resolution in the GMP. Rather it is an operational matter best determined by the Field Director, in consultation with the superintendents of both parks, on the basis of staff efficiency and service to the public.

Superintendent Ross R. Hopkins
Manzanar National Historical Site
P.O. Box 426
Independence

30 March 1996



Dear Superintendent,

Re: Manzanar National Historic Site

I had the opportunity to attend one of your four public hearings on the proposed development of the Manzanar War Relocation Center. There were no dissenters amongst the 50 plus attendee at the Gardena, CA, meeting in favoring Alternative C.

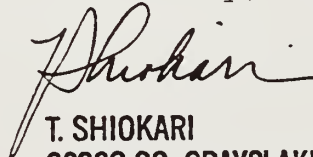
My wife Nobuko was sent to Manzanar and I was sent to the Poston Relocation center. These Relocation Centers were called a "Concentration Camp" at times. At the outset and continuing for over a year, Concentration Camp was an accurate description, because of 24 hour armed sentry soldiers, MP's, poorly constructed barracks with one room for each family, only public toilets and showers with no privacy whatsoever, three meals in a mess hall, center confined within barb wire enclosure, and no schools or recreation facilities. No freedom to travel outside of the barbed wire enclosure. All of these Concentration Camp characteristics were slowly corrected as cooler heads provided living approaching more normal conditions. If one was to visit the camps after improvements by those living in the centers, the camps would appear to be Relocation Centers.

For the Alternative C, I strongly urge the NPS to depict the typical conditions when the Japanese race was first evacuated into the centers (concentration camp), and also conditions near the end of the war (relocation centers) where gardens, schools, recreation facilities were made available.

Such camp transition will show to the US public how the government changed in its management of the relocation centers. This was an experience that needs to be shown. At the start of the relocation movement, the western US was very hostile to the Japanese race, and this was clearly shown upon entering the camp and months to follow. Time finally gave way to cooler heads amongst those in power in providing more sane living conditions and freedom to relocate to states east of Utah.

I sincerely appreciate your efforts in administrating the development plans with little resources for the Manzanar National Historic Site. Lets hope congress will allocate the funds to make it happen. If I can be of any assistance, please call on me (310-378-6513).

Yours truly,



T. SHIOKARI
26308 SO. GRAYSLAKE RD.
RANCHO PALOS VERDES, CA 90274

RESPONSE TO T. SHIOKARI

1. It is apparent that many of the disagreements and controversies over the nature of the camp are based on a "snapshot" memory of Manzanar when in fact the physical conditions of the camp and the nature of the camp's management changed significantly between the opening of the camp in the spring of 1942 and the its closing in 1945.

We agree that it is essential to explain and interpret the changes that occurred in the camp over the course of its operation. We can accomplish this through written materials, historic photos, and possibly displays of reconstructed barracks. The best means of achieving this will be considered in the context of interpretive planning.

29 February 1996
1114 N. Kenter Avenue
Los Angeles, CA 90049

cd-3/8/96

Mr. Ross Hopkins
Superintendent - Manzanar
Manzanar Historic Site
PO Box 426
Independence, CA 93526-0426

Re: Manzanar - Draft General Management Plan
December 1995

Dear Superintendent Hopkins:

First, I would like to commend Mr. Dan Olson and his team for the Plan. It goes a long way to ameliorate the problems between some of the elements in Inyo county and the Japanese-Americans. The exhaustive contacts with so many groups and the stress given to the economic benefit to the county is of paramount importance.

From the GENERAL MANAGEMENT PLAN, PAGE 23
CULTURAL RESOURCE MANAGEMENT

'The site would be managed primarily as a cultural landscape relating to the internment camp era.'

This statement demeans what it means to be a Japanese-American in concentration camps. To a Japanese-American, history - the history of the Japanese-Americans in the concentration camp era, the events, history leading to the episode, American history and acts relating to this period is of primary importance.

From Public Law 102-248

Section 101. ESTABLISHMENT

(a) In General - In order to provide for the protection and interpretation of historical, cultural, and natural resources associated with the relocation of Japanese-Americans during World War II ---

The Plan puts history on the 'back burner' and buries it. I believe that Public Law 100-383, the Civil Liberties Act of 1988, is more fundamental in this area.

SECTION I. PURPOSES.

The purposes of this Act are to -

- (1) Acknowledge the fundamental injustice of the evacuation, relocation, and internment of United States citizens and permanent resident aliens of Japanese ancestry during World War II;
- (2) Apologize on behalf of the people of the United States for the evacuation, relocation, and internment of such citizens and permanent resident aliens;
- (3) Provide for a public education fund to finance efforts to inform the public about the internment of such individuals so as to prevent the recurrence of similar event;

FROM THE GENERAL MANAGEMENT PLAN, PAGE 24

8 'A single watchtower -- at the midpoint of the camp's south boundary, or at another historic watchtower site on the camp perimeter easily seen by visitors.' 'Easily seen by visitors' could mean anything. This is perpetuating a lie. This is not telling the truth. This is an attempt to hide the facts. Treatment of the tower issue in this manner is insulting to Japanese Americans. This is a fact - words from some prominent Americans and officials in high offices that evacuation and concentration camps were for the protection of the Japanese Americans. Watchtowers make these kinds of statement and claims patently untrue. Guns in watchtowers were pointed inwards. Why is it that the watchtowers were outside of the barbed wire fence instead of on the inside to protect the inmates? Why was the Military Police housed outside the protective fence? Historically there was a complement of seven watchtowers. According to DGMP/EIS December 1995, cost would appear to be modest, i.e., a few thousand dollars, therefore it would appear not out-of-line to put in the full complement to give a true picture of the historic scene. Some may be willing to compromise to a minimum of two in front. In my view this denial of free speech.

With your permission I would like to present the issues contained in this letter to the participants at the meeting on March 16, at the Japanese-American Cultural and Community Center. Also I would like to ask for pin-up bulletin board space of approximately 36" X 36" for props.

Yours very truly,


Kunio A. Sumida

RESPONSE TO KUNIO SUMIDA

1. The subject statement is somewhat vague and subject to misinterpretation, but it is certainly not intended to demean Japanese Americans. The final document has been edited to further clarify the intent of this statement. A "cultural landscape relating to the internment camp era" would contain features from that period which allow the visitor to understand the historic nature of the area. Under this concept, existing historic features such as the camp's road alignments, existing foundations, constructed gardens, and other extant camp features would be preserved, and some reconstruction of historic features from the camp period, such as barracks, fences, watch towers, etc., could occur. These features are all considered to be elements of the cultural landscape. By defining the relevant period, we exclude the option of reconstructing features from earlier or later periods, although these periods may be interpreted through various media in the interpretive center and at wayside exhibits.

2. It is important to understand the different purposes of these two public laws. Public Law 100-383, the redress legislation, provides a formal national apology and monetary compensation to Japanese Americans for the WWII relocation program. Its purpose is not preservation of history but rather the acknowledgment of and measures aimed at righting a past wrong.

Public Law 102-248, which establishes Manzanar National Historic Site, is not intended as a redress measure, but rather has the objective of ensuring the preservation and interpretation for the public of an important part of our national history. This legislation requires the Park Service to undertake the same sort of program of resource preservation and visitor service that would be provided at any other unit of the National Park System. Many people, of course, believe that exposure of the general public to the facts of the relocation program will in itself contribute to redress and will help to ensure that this sort of event never again occurs in the United States.

3. We do not agree that all eight watch towers are needed to provide a factual picture of Manzanar, any more than all the barracks or all the garden ponds need to be reconstructed. Alternatives to actual structures exist in the form of exhibits, models, and photos, all of which can be more readily maintained than reconstructions.

Towers, in particular, have the potential to be attractive nuisances and to attract youthful climbers, particularly in easily accessible locations. Thus they present potential liability problems should visitors fall and suffer injuries. Another disadvantage to constructing eight towers is that they offer tempting targets for vandalism or outright destruction, especially those located at the far reaches of the camp perimeter.

Finally, because the camp was nearly one square mile in size, it is questionable—due to the tree cover and the distances involved—if the full complement of towers would have much visual impact or interpretive value for park visitors.

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As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interest of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

Manzanar National Historic Site

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