



20 February 2023

**VIA EMAIL**



**Brad Little**  
Governor of Idaho

**Janet Gallimore**  
Executive Director  
State Historic  
Preservation Officer

**Administration:**  
2205 Old Penitentiary Rd.  
Boise, Idaho 83712  
208.334.2682  
Fax: 208.334.2774

**Idaho State Museum:**  
610 Julia Davis Dr.  
Boise, Idaho 83702  
208.334.2120

**Idaho State Archives  
and State Records  
Center:**  
2205 Old Penitentiary Rd.  
Boise, Idaho 83712  
208.334.2620

**State Historic  
Preservation Office:**  
210 Main St.  
Boise, Idaho 83702  
208.334.3861

**Old Idaho Penitentiary  
and Historic Sites:**  
2445 Old Penitentiary Rd.  
Boise, Idaho 83712  
208.334.2844

HISTORY.IDAHO.GOV

Robyn Achilles, Executive Director  
Friends of Minidoka

**Re: Draft TCP report**

Dear Ms. Achilles:

The Idaho State Historic Preservation Office has received and reviewed the document, *A Landscape of Isolation: A Traditional Cultural Property Study of the Minidoka Concentration Camp and its Viewsheds in Jerome, Lincoln, Blaine, and Minidoka Counties, Idaho, with Recommendations as to their Eligibility for Listing in the National Register of Historic Places*. We concur with the recommended finding that there is an eligible Traditional Cultural Property (TCP) associated with site.

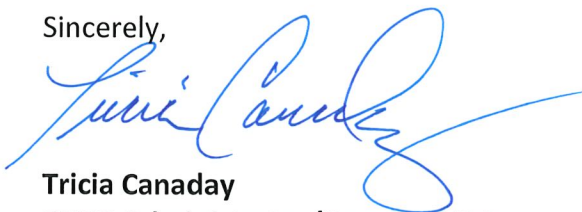
We offer the following comments:

- Criterion A eligibility is the strongest criterion for listing. The property has importance in the areas of significance of POLITICS/GOVERNMENT, and ETHNIC HERITAGE/ASIAN.
- The case for Criterion B significance is perhaps not sufficiently fleshed out to make a strong argument for including it. As per Bulletin 15: *The criterion is generally restricted to those properties that illustrate a person's important achievements, and, properties eligible under Criterion B are usually those associated with a person's productive life, reflecting the time period when he or she achieved significance [emphasis added]. Although the report states that many of the people who were incarcerated there were strongly influenced by their experiences at Minidoka, specific examples that support this statement are not provided in the report. Should you choose to pursue formal listing of the TCP in the NRHP, more documentation would be required to make the case for significance under Criterion B.*

- For Criterion D, it would be useful to cite the previously identified historic archaeological sites associated with the Minidoka incarceration site.
- The proposed boundary is very large and encompasses a significant amount of area where persons who were incarcerated did not physically spend time and that is not visible to the human eye from Minidoka. We feel this issue warrants further discussion and it might be useful to have the National Park Service NRHP staff participate in the conversation. A discontinuous boundary may be more appropriate.
- A small piece of the boundary line on the map on page 41 appears to extend into Nevada. If this is indeed the case, and the boundary remains as-is, it would be appropriate to provide the document to the Nevada SHPO for review.
- Related to that, the map is very large scale. Moving forward, more detailed maps will be necessary.
- We offer no comment on the section regarding “Areas of Critical Environmental Concern” as this is not a program the Idaho SHPO has worked with nor do we have expertise to share.

Thank you for the opportunity to review the draft document. Please let us know if you have any questions.

Sincerely,



**Tricia Canaday**  
**SHPO Administrator/Deputy SHPO**  
**Idaho State Historic Preservation Office**

cc. Ashley Long, BLM