



MINNESOTA DEPARTMENT OF NATURAL RESOURCES
 NORTHEAST REGION
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08/07/2015

Bill Storm, Environmental Review Manager
 Minnesota Department of Commerce
 85 7th Place East, Suite 500
 St. Paul, MN 55101

RE: DNR Comments to the Draft Environmental Impact Statement (DEIS) for the Great Northern Transmission Line. DOE/EIS-0499, E015/TL-14-21

Dear Mr. Storm:

The Minnesota Department of Natural Resources (DNR) has reviewed the Draft Environmental Impact Statement (DEIS) for the Great Northern Transmission Line. The DEIS describes the potential for environmental effects in an objective manner for activities associated with the transmission line thus should provide an example of future energy review in Minnesota. The DNR appreciates the early coordination opportunities that were provided to assist in development of the proposed project. In the early coordination phase, including our most recent August 15, 2014 Scoping/Route Permit comments, we provided information to assist in the adequacy of addressing natural resource impacts. From our review, we believe there remain areas where additional or more representative information would assist in development of the final document. We offer the following suggestions for inclusion in the Final EIS. Future comments to the Office of Administrative Hearings will focus on suggested routing and permit conditions.

Mining and Mineral Resources

Mining and mineral resource topics are found in the Summary section, in most of the Chapters, and in some of the Appendices of the Draft Environmental Impact Statement (DEIS) for the Great Northern High Voltage Transmission Line. The DEIS provides some discussion of mining and mineral resources for route alternatives and variations, and includes a requested comparative analysis for an area in northwest Koochiching County – the North Black River Variation Area.

Overall, simplifying assumptions made in Chapter 5 carry over into the comparative analyses in Chapter 6, into the Route Analysis Data Tables in Appendix E, and into the Summary. The general impression is that the simplifying assumptions made in Chapter 5 over-state risk of mineral resource/transmission line

co-location in areas having little certainty of mineral occurrence and under-state risk of mineral resource/transmission line colocation in areas containing known mineral occurrence. The comments below tie to specific sections of Chapters 4 and 5 of the DEIS where possible, but carry through to derived analyses and statements in Chapter 6, in Appendix E, and the Summary.

Section 4.3.2.4:

The primary mineral issues identified by commenters in this variation area were, a) potential for electromagnetic fields associated with Blue Route alignment to mask or otherwise prevent geophysical detection of mineral resources in an area already known to contain mineral occurrence; and b) elevated risk of mineral resource/transmission line co-location should mineral-occurrence advance to mineral-development.

The DEIS text misclassifies the level of metallic mineral occurrence in this variation area as “reserves”. Text here would be clearer and more accurate if the phrase “...avoidance of non-ferrous mineral reserves...” were replaced with a phrase like “...avoidance of the non-ferrous mineral area...” Application of the term “reserves” at other locations in the DEIS should likewise be revised where appropriate.

Sections 5.3.2, 5.4.2 and 5.5.2

The last sentence in the first paragraph of 5.3.2 might benefit by being identical to similar sentences in 5.4.2 and 5.5.2. As stated in 5.3.2, 5.4.2 and 5.5.2, transmission line structures could affect access to mineral resources. These sections of text should also note that, in addition to the physical structures, electromagnetic fields associated with transmission line operations may mask or prevent geophysical detection of mineral resources.

The simplifying assumption that the “MnDNR Division of Lands and Minerals, All State Mineral Leases mapping” represents mining and mineral resources results in over-statement of mineral resource/transmission line co-location risk in areas having little certainty of mineral occurrence, and results in under-statement of mineral resource/transmission line co-location risk in areas containing known mineral occurrence. State metallic mineral leases are not mineral resources (for instance as stated in Table 6-69 and similar tables “Land-Based Economy Resources”). Terminated state metallic mineral leases are not “inactive” leases (as described in section 6.2.1.2 and similar sections and in the mapping legends). Terminated leases are not “held” by companies (as described in section 6.2.3.2 and similar sections), and the footprint of historical terminated state metallic mineral leases is not “State Mining Land” as described in Figure 6-26 and similar figures. These miscorrelations carry through to affect the characterization of mineral importance in Chapter 6, in Appendix E, in the Summary, and in the red-yellow-green summary tables within the Relative Merits section (for instance section 6.4.6).

Presence of transmission lines proximal to mineral resources can be beneficial so long as they do not interfere with mineral operations. Along most of the route alternatives and variations, the location of undiscovered mineral resources in the landscape is so speculative that selection of one route, variation, or alignment over another does not result in meaningful reduction of co-location risk, or improvement of proximity benefit. At the following three locations, mineral resource information may be important.

0194-1

The text is revised to "avoidance of non-ferrous mineral area" in Section 4.4.1.4 of the EIS.

0194-1

0194-2

The text is revised in Sections 5.3.2.3, 5.4.2, and 5.5.2 to be similar and provide information regarding geophysical detection of mineral resources.

0194-3

The MnDNR provided the download URLs (email from Kevin Hanson at the request of Jamie Schrenzel, MnDNR, 12/2/2014) for the GIS data used in this EIS. The downloaded data included the active and expired/terminted leases, exploration and engineering drill core locations store at MN DNR Drill Core Library, areas offered for nonferros metallic minerals leasing, MGS statewide bedrock geologic map and data. This data is used for the discussion of mineral resources throughout the EIS.

0194-2

This downloaded data was used to develop the acreages in the tables "Land-Based Economy Resources..." In these tables, the text is revised for "State Mineral Leases" to "State Mineral Leases (active and/or expired/terminated)." The text is also updated throughout the Summary, Chapter 6, and the relative merit tables that clarifies if there are active leases in the variation areas.

0194-3

When the MN PUC selects the route, the Applicant will need to coordinate with the MnDNR Land and Minerals to identify and mitigate for the active mineral leases present in the ROW.

0194-4

0194-4

The text is revised in Sections 5.3.2.3, 5.4.2.3, and 6.2.1.2. The legend for Maps 5-4, 5-11, and 5-18 are revised and the term "inactive" leases is changed to "expired/terminated leases".

0194-5

The text is revised throughout Chapter 6 to remove the reference to expired/terminated leases being "held" by companies.

Tables in Chapter 6 that used the term "State Mineral Leases" are updated to "State Mineral Leases (active and/or expired/terminated)". The text is updated in the summary, Chapter 6, and the relative merit tables for each variation area to identify if

there is any active or expired/terminated leases. Appendix E indicates that total acres of mineral lease lands within the ROW and route width for each alternative.

0194-5

Thank you for your comment. Revisions were made to the EIS as described in Comments 213-6 and 213-7.

1.) The North Black River Variation Area comparative analysis was requested for mineral occurrence reasons, as a location where meaningful reduction of geophysical mineral resource detection risk might be achieved by co-locating the route with existing transmission line(s).

2.) In the south half of the Effie Variation Area, the Orange Route and the East Bear Lake Variation intersect active state metallic mineral leases and intersect additional state lands being considered for a fall, 2015 state metallic mineral lease sale. The Blue Route does not presently intersect active state metallic mineral leases or upcoming lease offerings. Where active state metallic mineral leases are present, conditions of the lease carry a requirement for coordination and consultation with lessees and an “undue interference” determination by DNR. The Blue Route is not subject to these requirements since no active state metallic mineral leases are present. The Blue Route does not intersect parcels being considered for metallic mineral lease sale in fall of 2015. The level of resource certainty in the south half of the Effie Area variation is insufficient to favor one route over another from a minerals perspective.

Collection of baseline geophysical data prior to construction and operation of the transmission line may provide a means to partly mitigate risk of transmission line interference with geophysical mineral exploration techniques, particularly where new line segments are not co-located with existing utilities (typically a helicopter-borne geophysical survey). Collection of baseline geophysical data could partly mitigate the State mineral risk imposed by applicant’s preferential routing onto state-owned lands.

3.) Impacts of the proposed Balsam Variation on iron resources in iron-bearing basins and stockpiles needs to be described in the DEIS for the portion of the Balsam Variation located south of the Minnesota Power 28 Line, or roughly the last 4.5 miles of the variation. In this area the DEIS should describe and compare potential for impact on iron resources and access to iron resources.

The Blue/Orange route alternatives merge to cross the Mesabi Iron Range as a single route, at a location where state-owned surface and mineral interests are not known to be present. Privately owned surface and mineral interests in the Mesabi Iron Range crossing area may be impacted by transmission line alignment.

In areas of known mineral resources such as the Mesabi Iron Range, a 200 foot Region of Influence (ROI) (as described in section 5.3.2.3 and similar sections) may not be sufficient for impact analysis. When considering the Mesabi Iron Range crossing, an ROI of 1,000’ or more on either side of the alignment may be more appropriate for impact analysis, since equipment and infrastructure presence can impact mining development planning and operations at distances of a quarter mile or more. Section 6.4.3 may also benefit from this comment.

Public Waters, Fish and Wildlife and Forestry, General

The document appears to lack additional information for minimizing or mitigating environmental impacts for public waters, fish and wildlife and forestry impacts. The DNR requested this analysis in Scoping/Route Permit comments in our August 15, 2014 letter.

0194-6
Text is added to Section 6.4.3.2 of the EIS to address the reduction of geophysical resource detection risk.

0194-7
Text is added to Section S.10.3.2 and 6.4.2.2 to indicate the active state mineral leases for the Proposed Orange Route and the East Bear Lake Variation.

0194-8
When the MN PUC selects the route, the Applicant would coordinate with the MnDNR to discuss the collection of baseline geophysical data.

0194-8
No changes are made to the EIS in response to this comment.

0194-9
The southern portion of the Balsam Variation crosses know state mineral resources leased by the MnDNR. The area is within the property boundary for Magnetation as shown on the map at <http://www.magnetation.com/home/wp-content/uploads/2014/05/Land-Plant4JLOPropBound300dpi.pdf>. While transmission lines cannot be constructed on active mine features, the 3,000 foot route width could allow flexibility to site the transmission line to avoid the feature. Construction of transmission lines could affect futre mining operations if the transmission line or structures encumber the lease or interfere with access to mineable resources or the ability to remove these resources. However, if a conflict were to arise, then the transmission line and structures would need to be relocated to allow access to the mineral resource.

0194-10
Sections S.10.3.3, 6.4.3.2 and 7.2.2.4 of the EIS are updated with information related to the Balsam Variation and mining.

0194-10
When the MN PUC selects the route, the Applicant would need to coordinate with private landowners as discussed in Section 2.9 of the EIS.

0194-12
No changes are made to the EIS in response to this comment.

0194-11

Although the EIS uses a 200 foot ROI, Appendix E of the EIS provides the state mineral lease acreage for the 200 foot ROI (also the ROW) as well as the 3,000 foot route width.

0194-12

The Applicant will work with the MnDNR and other appropriate resource agencies through permitting to minimize and/or mitigate potential impacts to public waters, fish and wildlife, and forestry as discussed in Chapters 5 and 6 of the EIS. Table 2-2 provides the Applicant's proposed measures to minimize environmental impacts. In addition, conditions in the MN PUC Route Permit could require the Applicant to prepare plans for vegetation management, etc. as identified in the draft Route Permit in Appendix B of the EIS.

No changes are made to the EIS in response to this comment.

Wetlands, General

Construction activities, including the establishment and use of temporary access roads, staging, and stringing areas, may require access across wetlands and other water resources to facilitate construction of parts of the proposed project that are not easily accessible by public roadways. Preparing the site and installing structures may have short-term impacts on 0.92 acres per structure (200 feet by 200 feet) by soil compaction associated with concentrating surface disturbance and equipment use (Minnesota Power 2014, reference (123)). Impacts in stringing and staging areas will be determined once the final route has been selected by the MN PUC.

The DEIS does not address access across wetlands using matting and equipment that is not low ground pressure in non-frozen conditions. It also does not address what the maximum depth of wetland rutting would be using matting in non-frozen conditions. Impacts to water resources could be minimized or mitigated through use of construction matting to traverse wetlands, limiting crossing of watercourses and using the shortest practical route, timing construction in these areas to take place during frozen conditions, and use of low ground pressure equipment to the extent practical. Construction access through wetlands could also be minimized through the use of helicopters to assist with construction activities, as appropriate. This will help to protect the sites for soil damage, but would also aid in site access. Much of the route crosses classified wetlands, so access during the warm months would be difficult at best for many locations.

The document should include a vegetation plan especially in terms of how damage to peatland vegetation will affect hydrology and peatland quality and mitigation for those effects.

State Approvals, Rare Natural Communities

As stated in the document any native plant community having a conservation status rank of S1, S2, or S3 or any native plant community within a MBS Site of Outstanding or High Biodiversity Significance may qualify as a rare natural community under the Wetland Conservation Act (WCA, see attached). In addition, even though they have not yet been delineated, any native plant community within a preliminary MBS Site of Outstanding or High Biodiversity Significance may also qualify as a rare native plant community under WCA. Because this is a provision of the WCA, it generally applies to wetland native plant communities or other communities affected by activities authorized under or required by a WCA replacement plan. The proposed route will impact Minnesota Biological Survey (MBS) Sites (and Preliminary) of Biodiversity Significance and Old Growth forest. Additional field work will be needed in order to determine potential impacts to native plant communities and to ensure compliance with the Wetland Conservation Act

State-listed species

Please continue to coordinate with Lisa Joyal, Endangered Species Review Coordinator, regarding the proposed surveys for state-listed species.

0194-13

The suggested wetland impact minimization methods are included in Chapter 5 of the EIS.

0194-13

A Vegetation Management Plan is not available at this time. Chapter 6 of the EIS identifies that the MN PUC Route Permit could also require the development of a Vegetation Management Plan as a permit condition, which could include plant surveys along the permitted ROW, incorporate vegetation clearing, and management of invasive species. The MN PUC typically requires the Applicant to prepare a plan in coordination with the MnDNR as a condition of the Route Permit.

No changes are made to the EIS in response to this comment.

0194-14

The Applicant will work with the MnDNR and appropriate local governmental units during the permitting phase to ensure compliance with the Wetland Conservation Act regarding native plant communities.

No changes are made to the EIS in response to this comment.

0194-15

The Applicant will also continue to work with Lisa Joyal (MnDNR) regarding potential impacts to rare species and native plant communities.

0194-14

0194-15

Forestry

Section 5.3.2.2. Forestry, General Impacts, page 169-170

In this section, the draft EIS states that, "Impacts to timber harvesting operations could be mitigated by prudent routing (i.e., by selecting routes that avoid forest lands by following existing infrastructure ROWs, access road ROWs, and property lines). ROW maintenance could be managed to reduce impacts on forestry resources. ... In addition, increasing the time between line maintenance in forested areas could result in harvestable products." Also, the project's Right-of-Way fact sheet states that, "trees and shrubs with the potential to exceed 15 feet in height are generally not permitted within the ROW." The draft EIS should not give the impression that right-of-way maintenance may be timed to allow tree species to potentially grow to merchantable size for typical uses in the paper and wood industry. If other harvestable products are possible they should be mentioned and explained. The DNR would also expect compensation or repair to our Forest Road System due to the use of the roads during the construction phase.

Other General Comments

Section S.9.2. Route Specific Impacts to Central Section, page S21.

The area around Larson and Bass Lakes appear to be within 1500 feet of the anticipated alignment. This was not mentioned as part of this section. It would be helpful to add a view-shed for anticipated view impacts Larson (31-0317) and Bass Lakes (31-0316) as well as state and county campground locations.

Section 2.1, Proposed Project, page 15 and Map 2-01.

The DEIS identifies a compensation station that will be located in Roseau County We are unable to determine if this is being proposed to be located on or adjacent to state land. According to the DEIS, the series compensation station will permanently impact approximately 60 acres.

Chapter 5

Chapter 5 discusses the introduction or spread of invasive species and the potential impacts it may have on existing landscapes and new corridors. The DEIS does not address how the project will mitigate the spread of invasive species/noxious weeds especially in peatland watershed protection areas. An Appendix with a Noxious Weed and Invasive Species Control Plan should be part of the Final EIS.

Chapter 6

In viewing the ownership tables and associated figures in Chapter 6, it would be easy to mistakenly conclude that no private lands are intersected by the route alternatives or variations.

In the document, tabular distinction between School Trust land acres, Tax Forfeit land acres, and County Fee land acres would be helpful. "State Forest" is a management category, not an ownership category.

0194-16

The text referred to in this comment is removed from Section 5.3.2.2 of the EIS.

The Applicant would need to abide by NERC standards. Utilities must certify that vegetative clearance requirements are met annually to insure reliability.

0194-16

0194-17

Although areas around Larson Lake and Bass Lake appear to be within 1,500 feet of the proposed Orange and Blue routes, the shared alignment of these routes is approximately 1,800 feet from the southern-most shoreline of Bass Lake and approximately 3,000 feet from the northern shoreline of Larson Lake. The Bass Lake Alignment Modification would adjust this alignment approximately 750 feet farther from Bass Lake and the same distance closer to Larson Lake at its farthest distance from the alignment of the proposed Orange and Blue routes. Although it is possible the transmission line would be visible from areas in the vicinity of these lakes, it is likely that dense forest in the area would partially or fully screen views of the transmission line.

0194-17

Viewshed maps for specific areas have not been prepared as part of the EIS. The assessment of visual impacts relies on the idea stated in Section 5.3.1.1 that, "The 1,500 foot ROI for aesthetic resources was identified because the proposed Project is most likely to be visible within this near-foreground distance zone and views of the proposed Project from aesthetic resources within this distance zone have the greatest potential to result in visual impacts for sensitive viewers." Visual simulations, provided in Appendix N, Photo Simulations, of the EIS, were prepared for seven viewpoints within the study area to represent typical views of the proposed Project. These simulations are intended to provide reviewers with a sense of what the transmission line would look like from various distances and in various landscape settings within the study area.

0194-18

No changes are made to the EIS in response to this comment.

0194-19

0194-20

0194-18

Maps 6-11 and 6-13 in the EIS show that the compensation station would be adjacent to state lands.

No changes are made to the EIS in response to this comment.

0194-19

Chapter 6 of the EIS identifies that the MN PUC Route Permit could also require the development of a Vegetation Management Plan as a permit condition, which could include plant surveys along the permitted ROW, incorporate vegetation clearing, and management of invasive species. The MN PUC typically requires the Applicant to prepare a plan in coordination with the MnDNR as a condition of the Route Permit.

No changes are made to the EIS in response to this comment.

0194-20

Tables in Chapter 6 of the EIS are updated for clarity.

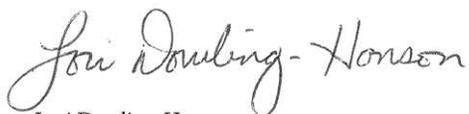
The document should include a robust wildfire response plan, both during construction and in the future. Minimum Impact Suppression Tactics (MIST) is suggested when fighting fires on peatland SNAs. It would be good for the applicant to reference MIST. The DNR can assist in providing this information.

Please include a definition of *Residence*, whether it refers to full time or seasonal occupancy, or both and whether that distinction affects the outcome of the analysis.

If interphase spacers are used for this project, the document should describe the timing, where and how they will be installed.

The DNR also plans to comment during the next phase of the routing record. We intend to provide more information regarding the routing decision and/or preference as well as routing conditions such as plans needed for permit conditions or other remarks to assure we have provided a complete project review. Thank you for the opportunity to comment on the DEIS for the Great Northern Transmission Line Project and let me know if you have any questions.

Sincerely,



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Enclosures: 2

C: Julie Smith, US Department of Energy
Jim Atkinson, Minnesota Power
Greg Nelson, DNR Northwest Region Director

0194-21

The Applicant provided the following response (September 9, 2015): In terms of wildfire management during construction activity, the Applicant expects that the contractor(s) will follow industry standard protocol for fire prevention including but not limited to:

a. Maintain orderly work sites.

b. Regularly inform workers on fire danger, particularly in high fire danger seasons and areas.

c. Identify and communicate emergency contact information for the appropriate work location.

d. Fire extinguishers available on all equipment.

e. Fire spotters in place during hot work (welding, grinding, etc.).

f. Conduct open burning only by and in accordance with burning permit.

g. Act expeditiously to extinguish wildfires, see excerpt for previous line construction contract: "The Contractor shall do everything reasonably within its power, both independently and on request of any duly-authorized representative of the United States, to prevent and suppress fires on or near the job-site, including making available such construction personnel and equipment as may be reasonably obtainable for the suppression of such fires."

These protocols will be further defined in the project general conditions.

In terms of wildfire management after the line is in service: The Applicant regularly inspects all transmission lines. The Applicant desires to be informed of any wildfire that impacts a transmission right-of-way so that a special inspection can be made to evaluate line integrity. Generally, there is more concern for damage to lines constructed with wood poles; however, all impacted lines should be inspected. If the responding fire department or agency utilizes aerially applied chemical fire retardants to control the fire, the Applicant may request more information on the chemical fire retardants used to evaluate and address possible corrosive effects and insulator contamination issues these agents may have on the transmission facility.

No changes are made to the EIS in response to this comment.

0194-22

For purposes of the EIS, a residence is defined as a structure that is capable of human habitation based on aerial photographs and

public input, irregardless of whether somebody is currently living there.

No changes are made to the EIS in response to this comment.

0194-23

The Applicant provided the following response (September 9, 2015): Generally on transmission voltage level projects, the use of interphase spacers is a remedial action to mitigate an unforeseen conductor problem, not part of the initial design. Interphase spacers are used to maintain phase to phase clearance between conductors, particularly during a wind induced conductor movement phenomenon known as galloping. One of the primary concerns in a galloping event is that, if not properly designed, two phases could contact each other or a ground wire and cause an outage. The proposed Project, and most transmission line designs in general, utilize a combination structure size, phase spacing, insulator configuration, span length, and conductor tension to minimize the probability that conductors will contact during galloping. Installation of interphase spacers on transmission facilities is complicated, expensive, and rare. The use of interphase spaces for the proposed Project is not anticipated or desired. The Applicant may apply interphase spacers or other remedial measures only to mitigate severe problems as necessary; however, the timing, location, and methodology of such remedial measures would be determined during detailed final design.



WETLAND CONSERVATION ACT

Rare Natural Communities



BWSR/DNR Technical Guidance, January 31, 2011

Overview

Rule Reference: MN Rule 8420.0515, Subpart 3.

Applicability: This guidance provides the Department of Natural Resources' (DNR) criteria for identifying rare natural communities insofar as the applicable WCA rule section assigns that responsibility to the DNR. It should be used as a supplement to the WCA rule.

Intended Use: To communicate the DNR's criteria for determining "rare natural communities" to Technical Evaluation Panels (TEPs), Local Government Units (LGUs), landowners, and applicants, and to provide guidance on its application.

Rare natural communities are one of several "Special Considerations" listed in the WCA rules for wetland replacement plans.

Background

Within the general topic of "Wetland Replacement," the rules for the Wetland Conservation Act (WCA) contain the following provision under "Special Considerations":

Minn. Rule 8420.0515 Subp. 3. Rare natural communities. A replacement plan for activities that involve the modification of a rare natural community as determined by the Department of Natural Resources' natural heritage program must be denied if the local government unit determines that the proposed activities will permanently adversely affect the natural community.

The DNR's Natural Heritage and Nongame Research Program (NHNRP), in collaboration with the Minnesota County Biological Survey (MCBS) identifies, describes and maps rare and high quality native plant communities in the Natural Heritage Information System (NHIS).¹ Since the term "rare natural community" is not defined in the WCA rule, this guidance is provided to clarify which native plant communities are applicable to the rule section above. Rare natural communities identified under this WCA rule provision often support endangered and threatened species. However, please note that there is a separate "Special Consideration" in the WCA rules pertaining to listed species (8420.0515, Subpart 2).



Rare natural community example: Ephemeral wetlands associated with a Southern Bedrock Outcrop native plant community.

¹ For additional information, see: <http://www.dnr.state.mn.us/eco/nhnrp/nhis.html>

Criteria for Identifying Rare Natural Communities

Native plant communities. Native plant communities in Minnesota are classified according to the Minnesota Native Plant Community Classification System developed by the DNR.² The DNR's Natural Heritage and Nongame Research Program has determined that the following native plant communities qualify as "rare natural communities" for the purposes of Minn. Rule 8420.0515, Subp. 3.

Rare Natural Communities are:

"Native plant communities having a conservation status rank of S1, S2, or S3 that are mapped or determined by the NHNRP or MCBS to be eligible for mapping in the Natural Heritage Information System;

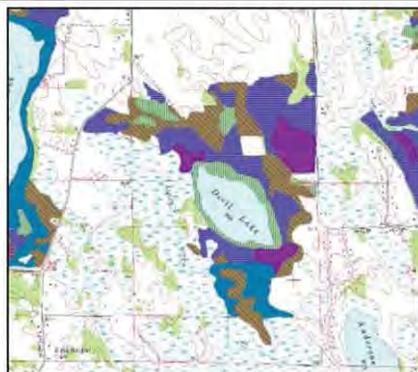
or

Any native plant community that is contained within an area mapped or determined by the MCBS to be eligible for mapping in the Natural Heritage Information System as having an Outstanding or High biodiversity significance ranking."

Conservation status ranks. Conservation status ranks of native plant communities reflect the extent and condition of the community type in Minnesota (shaded rows qualify for "rare natural community" status):

S1	Critically imperiled
S2	Imperiled
S3	Vulnerable to extirpation
S4	Apparently secure, uncommon but not rare
S5	Secure, common, widespread and abundant

A list of native plant communities and their associated conservation status ranks can be found at: http://files.dnr.state.mn.us/natural_resources/npc/s_ranks_npc_types_&_subtypes.pdf



GIS data layers of mapped native plant communities and sites of biodiversity significance are available for download from the DNR Data Deli at: <http://deli.dnr.state.mn.us/index.html>

Biodiversity significance ranks. Biodiversity significance ranks are a measure of the statewide importance of MCBS sites for native biological diversity³ (shaded rows qualify for "rare natural community" status) :

Outstanding	Sites containing the best occurrences of the rarest species, the most outstanding examples of the rarest native plant communities, and/or the largest, most intact functional landscapes.
High	Sites containing very good quality occurrences of the rarest species, high-quality examples of rare native plant communities, and/or important functional landscapes.
Moderate	Sites containing occurrences of rare species, moderately disturbed native plant communities, and/or landscapes that have a strong potential for recovery.
Below	Sites below the minimum threshold for statewide biodiversity significance; lack occurrences of rare species and natural features.

² For additional information, see: <http://www.dnr.state.mn.us/npc/classification.html>

³ For additional information, see: http://www.dnr.state.mn.us/eco/mcbs/biodiversity_guidelines.html

Guidance on Applying the WCA Rule

How to know if a Rare Natural Community is present.

There are several avenues for determining if a rare natural community is present at a specific site:

1. **GIS Data Layers.** Applicants, LGU staff, and TEP members can consult the publicly available GIS data layers referenced above to determine if any native plant communities or sites of biodiversity significance have been mapped at the site in question. If a native plant community has been mapped, check its conservation status rank at the web site listed previously to see if it has a status rank of S1, S2, or S3.
2. **NHIS Data Request.** Applicants may submit a Natural Heritage Information System search request. The DNR will conduct a search of the NHIS and provide a report of any features present at the site. For information on how to submit such requests, go to: <http://www.dnr.state.mn.us/eco/nhnrp/nhis.html>. There is a fee for having the DNR conduct these searches.
3. **Local Knowledge.** LGU staff and TEP members are encouraged to become familiar with the native plant communities that may be present in their area in order to recognize candidate rare natural communities.⁴ Although the NHIS data layers are useful for determining whether any rare natural communities are present at a specific location; the absence of a mapped feature in the GIS data layers does not necessarily mean that a rare natural community is not present.
4. **DNR Review.** The DNR is on the mailing list to receive WCA notices of application and, based on their review, may notify LGUs of the presence of existing or potential rare natural communities at a site.



Rare natural community example: Northern Wet Prairie in Polk County.

⁴ The DNR's web site at <http://www.dnr.state.mn.us/npc/index.html> is an excellent resource on native plant communities and also contains ordering information for a series of field guides on native plant communities in Minnesota.

What to do if a Rare Natural Community is present.

If a rare natural community is present at a site or a candidate community is present, contact your local DNR TEP representative, the regional DNR environmental assessment ecologist,⁵ or the DNR Division of Ecological and Water Resources Wetland Program Coordinator (651-259-5125). A TEP meeting should be called, with a specific invitation to the DNR to participate. The TEP may want to consider inviting additional DNR representatives that have specific expertise. The DNR will work with the TEP, applicants, and LGUs to assess potential impacts and, if possible, help design projects to avoid permanent adverse effects.

It is the LGU's responsibility to officially determine whether the proposed activity will "permanently adversely affect" the rare natural community. However, the DNR will often submit a written finding or opinion to the LGU. Potential mitigation measures may be considered in the determination of overall effects. If the LGU finds that the rare natural community will be permanently adversely affected, by rule the application must be denied.

The "Special Considerations" provisions in the WCA rule, including the one for Rare Natural Communities, apply to potential impact and wetland replacement sites.

BWSR/DNR Guidance, January 31, 2011

The primary author of this guidance is:

- Doug Norris, Wetlands Program Coordinator, MnDNR, Division of Ecological and Water Resources, 651-259-5125, doug.norris@state.mn.us

This document is available on the BWSR website and may be revised periodically. Check the web site for the most current version: www.bwsr.state.mn.us/wetlands.

For more information, contact your local Board of Water and Soil Resources wetland specialist or the DNR, Division of Ecological and Water Resources Wetland Program Coordinator.

⁵ http://www.bwsr.state.mn.us/contact/WCA_areas.pdf



August 15, 2014

Bill Storm, Environmental Review Manager
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul MN 55101

Re: In the Matter of the Application of Minnesota Power for a Route Permit for the Great Northern Transmission Line Public Utilities Commission
(PUC) Docket Number: E-015/TL-14-21
DNR ERDB Number: 20130195

Dear Mr. Storm:

The Minnesota Department of Natural Resources (DNR) has reviewed the Application for a Route Permit for the Great Northern Transmission Line Project and provides the following comments regarding the application content, impact assessment that should be scoped into the upcoming Draft Environmental Impact Statement (DEIS), mineral resources, and route alternatives for further review in the DEIS.

1. Comments on the Route Permit Application

General Comment:

In general, the route permit application was well written in an objective manner and accurately describes most of the impacts associated with construction and maintenance of a high voltage transmission line (HVTL). **The route permit application should be used as a primary source of information in preparing the EIS.** The following specific comments refer to information in the route permit application and include requests for additional analysis in the EIS.

Specific Comments:

3.4.2 State Approvals

This section indicates that the project is expected to be exempt under MN Rule 8420.0420 Subpart 6, yet estimated direct wetland impacts are described as exceeding the minimum .5 acre requirement that must be met in order to qualify for the exemption. Furthermore, wetland impact estimates are based on National Wetlands Inventory Mapping (NWI) mapping and/or other offsite methods which many times underestimate actual areal extent. **The DEIS should describe wetland exemptions requirements that must be met and how the project is expected to meet those requirements.**

Many of the native plant communities in the project area also are considered *rare natural plant communities* under the Wetland Conservation Act (WCA) ([MN Rule 8420.0515](#)). Guidance on Rare Natural Plant Communities under the WCA can be found on the Board of Water and Soil Resources - [BWSR webpage](#). **The EIS should assess impacts on rare natural plant communities and compliance with associated WCA provisions.**



4.1.2 Border Crossing Options

This section largely describes informal early coordination efforts between Minnesota Power (the applicant) and Manitoba Hydro and resulting mutual decisions regarding preferred crossing locations. **The EIS should summarize how border crossing alternatives may be affected by Manitoba Hydro and Manitoba/Canadian government decision making and review processes.**

Alternative border crossing locations are included in Section 4 of this letter. We understand that due to constraints at the proposed border crossing, it is possible that other commenters may also provide one or more alternatives for analysis in the EIS. The following features have the possibility of being impacted by routing in the vicinity of the proposed border crossing and should be addressed in the EIS as applicable: SNAs, Watershed Protection Areas associated with SNAs and fens, High Conservation Value Forest within state forest lands, a Great Grey Owl Management Area, WMAs, MBS sites of biodiversity significance, avian impacts, and fragmentation of large block habitats.

6.10.2 Recreation Area Users

Page 6.10-7 mentions potential visual impacts to users of the Big Bog State Recreation Area and that additional study is required to determine potential impacts. DNR agrees and is concerned about visual impacts to users of both the boardwalk and the Big Bog Recreation Area Fire Tower associated with the Orange Route. **A viewshed analysis (with scaled visual renditions of what one would expect to see) should be prepared as part of the EIS for these areas as well as other recognized viewsheds.**

6.17.2 Public Waters

The DEIS should describe short and long-term impacts of crossing streams (trout streams or other) and what measures would be taken to mitigate such impacts. Any plans for alternative construction and/or right-of-way management should also be described. On other projects DNR has recommended that water crossings should be avoided to the extent possible and if they are crossed consider neck downs in clearing widths as well as preservation and maintenance of woody buffers in riparian zones as a means to lessen impacts.

6.18 Wetland Impacts

Section 6.18.2 indicates that peat soils tend to be highly compressible, that compressed peat is slow to regenerate, and that vegetation communities could be impacted if soils are compressed and sunken. The DNR agrees with this. Experience has shown that construction in peat soils often times requires multiple layers of construction matting to create a stable work surface. After these mats are removed, the peat remains sunken/compressed and the area at times re-vegetates to an ecologically unsuitable open water wetland community (many times cattails).

The EIS should describe and account for compression of peat soils in determining impacts (also relates to whether project qualifies for exemption under MN Rule Chapter 8420) and mitigation requirements. Also, these and other types of impacts to vegetation and wetlands should be addressed as part of an overall vegetation management plan and included in the EIS.

This section also mentions that the route options would cross one or more Peatland SNA Watershed Protection Areas (WPAs) and that coordination with DNR will be required to determine whether effects may occur to calcareous fens. Any increase or change in groundwater movement in the WPAs could have significant and deleterious effects upon calcareous fen and SNA integrity. Primary concerns regarding the development of utility corridors within Peatland SNA WPAs include the alteration of hydrological processes during construction/maintenance of the corridor and the introduction of invasive

exotic species into otherwise undisturbed ecosystems. **To better inform route decisions and meet the purpose of environmental review, the EIS should include assessments with enough detail to better understand potential impacts to calcareous fens and WPAs.**

Section 6.18.3 indicates that the applicant will work with the USACE to develop a mitigation approach that meets compensatory mitigation requirements of the agency. **The EIS should disclose all plans for mitigation and recognize this as an opportunity to mitigate for a variety of ecological functions that will be degraded or lost as a result of the project.**

Section 6.18.3 also indicates that BMPs such as matting, ice roads, and low ground pressure equipment will be used to the extent practical to minimize wetland impacts during construction. **The EIS should include a plan that specifies protocols for usage of matting, ice road, and low ground pressure equipment in wetlands. The plan should also identify times that – due to site conditions – work will be halted to avoid impacts and comply with protocols.**

6.19 Wildlife Impacts

Section 6.19.3 includes several mitigation measures to avoid or minimize impacts to birds. **An Avian Mitigation Plan should be developed and included as an avian impact risk mitigation strategy as part of the EIS. As part of the plan, high risk areas and areas planned for bird diverter line marking should be included.** The EIS should provide a discussion on whether guy wires may also need to be marked.

Section 6.19.3 includes mitigation actions that are currently limited to birds. **The EIS should be expanded to include mitigation items for wildlife (i.e. methods to mitigate habitat loss, conversion, degradation, and fragmentation).**

Routes will fragment large blocks of contiguous habitats, some of which will be in critical deer yard habitat. The DNR has been assisting the applicant by providing potential compensatory wetland mitigation options to offset the functional losses associated with the conversion of forested wetland impacts that will require mitigation by the United States Army Corps of Engineers (USACE) 404 permit. The DNR and Minnesota Power are working together to establish wetland preservation areas adjacent to existing WMA deer wintering areas and the DNR appreciates the applicant's patience as the Department works through the proper internal mechanisms necessary to fulfill our divisional and departmental responsibilities.

6.25 Forestry Impacts

The route permit application describes extensive direct habitat loss and conversion of forests and shrub lands to herbaceous cover (2,745 and 2,680 acres of right-of-way for the Orange and Blue routes respectively) and corresponding changes in wildlife communities. The loss of nearly 4 square miles of forested land is significant and permanent. This should be noted in the Executive Summary as well as analysis of the effect of proposed deforestation on forest industry in MN.

The net loss of these specific habitat cover types is significant. **The EIS should assess way to compensate for what are viewed as significant impacts to forest habitat functions. Following are some potential options that should be included as mitigation options in the EIS:**

- Preservation and Maintenance Options – The EIS should cite specific requirements for HVTL right-of-way maintenance and include additional options that meet minimum requirements and minimize fragmentation and/or edge type effects. Management of the proposed corridor should

be studied to see how leaving small fruiting trees, shrubs, and mechanical versus chemical vegetation management will help mitigate loss of forest cover and forest fragmentation. The DNR can work with the applicant in determining areas to implement different vegetation management concepts.

- The DNR is interested in learning about the length of time between line maintenance in forested areas, to explore the possibility of leaving species long enough to have a harvestable product at the time of maintenance.
- The EIS should include any areas where, due to elevation, a line could be spanned high enough over an area to avoid forest clearing. For example, certain wetland and riparian areas in northern Itasca County are surrounded by elevation changes that may result in a scenario where no trees would need to be cleared. Also, certain species growing in bogs may not grow to a height that requires clearing. The EIS should assess these methods of reducing clearing.
- Replacing or providing substitute habitats - DNR has been assisting the applicant by providing them potential compensatory wetland mitigation options to help offset the functional losses associated with the conversion of forested wetland impacts. This is intended to facilitate what potential United States Army Corps of Engineers (USACE) 404 permit mitigation requirements.
- We believe that the EIS provides an opportunity to identify mitigation that would mutually compensate for the loss of forested wetland functions and the extensive direct habitat loss and conversion of upland forests and shrub lands to herbaceous cover. The EIS should differentiate between the two to determine net functional loss, significance of that loss, and remaining compensatory mitigation needs.

Section 6.25.2 limits the assessment of forestry impacts to acreage lost to conversion of cover type and indicates that impacts will be minor relative to the overall acreage affected. **Since the loss of forest cover will also diminish the long-term production capacity of these lands, loss of forestry revenue should also be assessed in the EIS. This analysis should include impacts to Consolidated Conservation ("Con-Con") Lands and School Trust Lands.**

The DNR also asks that the applicant address "Danger Trees" as soon as possible and account for estimated impacts to forests. These are trees outside of the proposed ROW that may need to be removed. The DNR wishes to avoid writing special permits for removal of trees that may fall into the ROW.

6.26 Mineral Resources

Chapter 6 of the Route Permit Application includes a preliminary discussion of mining existing conditions, transmission line direct and indirect effects on mining, and mitigation (section 6.26 of the application). This section of the EIS might be better titled "Mining and Mineral Resources." The discussion should be expanded to address potential conflict in areas of known but undeveloped mineral occurrence. These potential conflicts include both reduction of development potential where route alternatives intersect inactive or undeveloped resource areas and reduction of mineral exploration effectiveness where high voltage lines interfere with electrical and magnetic survey techniques.

The preferred and alternative routes proposed in the application incur the necessity of crossing the known iron resource area of the Mesabi iron range, the necessity of crossing a zone of known

nonferrous mineral occurrence in NE Itasca County that is undergoing active state metallic mineral leasing and exploration, and deviation from existing corridor in NW Koochiching County to cross another zone of known nonferrous mineral occurrence. Crossings of the Mesabi iron resource area and the two mineral occurrence zones carry elevated risk for eventual mineral resource/transmission line conflict. The risks to both the transmission line applicant and mineral rights owners are significant, carrying exceptional consequence (transmission line re-routing and/or loss of economic resource) in the event of occurrence. The EIS should describe the likelihood and consequence of mineral resource/transmission line conflict for known and undeveloped mineral resource areas. The risk of mineral resource/transmission line conflict should be transferred to the transmission line applicant and not be absorbed by School Trust, Tax Forfeit Trust and other state-owned land beneficiaries. The EIS should describe mechanisms that will be used to ensure that incurred risk is transferred to the transmission line applicant, and mitigation steps (perhaps engineering considerations) that can be used now to minimize conflict in the event that rerouting becomes necessary in the event of mineral development.

Peat, Sand/Gravel Aggregate, Crushed Stone

It is likely that state-owned surface estate mineral resources (peat, sand/gravel aggregate, crushed stone, clay, etc.) may eventually be encumbered by transmission line structures. Best practice will be to avoid unnecessary impact on these resources. Once a route is finalized, state-owned lands affected by the route will be evaluated (at applicant expense) to determine if and where compensation will be required for encumbrance of surface estate mineral resources.

Metallic Minerals Outside the Mesabi Iron Range

In northwestern Koochiching County, a segment of the route (vicinity of Township 159 North, Range 27 West) deviates away from existing corridor and transects an area of recent and historical metallic mineral occurrence, leasing and exploration. Absent more significant siting factors, continuation of the route along existing corridor (Black River comparative alternative) to the southeast corner of Section 10 and then south along existing corridor would be less likely to impede future exploration for metallic mineral resources. We request that this alternative be considered included for comparative analysis in the EIS.

From the vicinity of Effie, and for the next roughly 25 miles to the southeast the preferred route and alternatives (including the Effie alternative) cross a volcanic belt that hosts known metallic mineral occurrences (gold, copper-zinc-lead, iron). All of these routes cross active state metallic mineral leases in zones having high potential to host metallic mineral resources. The zone of high mineral potential generally extends southwest into the Chippewa National Forest and northeast into the Lake Vermilion area. State-issued metallic mineral lease agreements are also surface leases when the state-owned mineral interest is coincident with state-owned surface ownership. State metallic mineral lease agreements allow for state issuance of additional leases, permits or licenses where state surface ownership is present at a mineral lease, provided that the mineral lessee is consulted and that issuance of such additional leases, permits or licenses is determined to not unduly interfere with lessee's exploration or mining development. The Department recommends that transmission line applicant, State, and mineral lessee meet together to better characterize preferred and alternative route impacts in this area and to solicit additional input from the mineral lessee on exploration and development risks, prior to DNR "unduly interfere" determination (MN Rules 6125.07, item number 5). At first glance, the Blue route has the smallest interference footprint for crossing the volcanic belt and lease area. The "Effie" alternative produces a longer interference footprint but is co-located with an existing transmission line.

Mesabi Iron Range

The applicant's route proposal to cross the Mesabi Iron Range does not encumber known state mineral resources.

The Mesabi Iron Range is an area of known iron resources, along a trend of enriched iron formation which at many other locations has been developed into economic resource. The Department would have concerns if alternative routes were proposed that would encumber state-owned mineral resources on the Mesabi Iron Range.

2. Additional impact assessments that should be scoped into the EIS

Large Block Habitats

The Route Permit Application thoroughly describes habitats species usage, direct and indirect habitats loss, habitat scarcity conversion, degradation, fragmentation, and edge effects. However large blocks of contiguous habitats still appear to be impacted. **The DEIS should assess project effects on wildlife areas, lost forested acres, and other natural features as well as describe planned compensatory mitigation measures.**

The DNR understands that some areas of large block habitats are un-avoidable and there are trade-offs with every route. **In addition to mitigation, the proposed route corridor impacts to large block habitats could be lessened with other route alternatives or alignments that utilize existing corridors.** The following resources (MBS Sites, Wildlife and Forestry) relate to large block habitat and describe in more detail our more specific areas of concern and comments.

Minnesota Biological Survey (MBS) Sites of Biodiversity Significance

Proposed routes will impact Minnesota Biological Survey (MBS) Preliminary Sites of Biodiversity Significance and Old Growth forest. The preliminary sites have not been fully designated. The document mentions the impact on Native Plant Communities specifying potential impacts to Ecologically Important Lowland Conifers (EILC); however it is unclear whether Preliminary MBS ranking was used in assessing data or route selection and what mitigation or minimization of impacts will result. **The DNR recommends avoidance of all MBS sites old growth and old growth special management zones ($\geq 330'$ surrounding the entire old growth perimeter) to the extent practical.**

MBS data for much of the project area has yet to be collected or is not yet publically available through the DNR data deli. Earlier correspondence (August 8, 2012 DNR Letter) indicated the DNR Heritage Review Coordinator should be contacted for obtaining any preliminary shapefiles (see attached for MBS data status). MBS Map and Guidelines have also been previously provided to Minnesota Power.

We encourage the applicant to consider project route and alignment alternatives that would avoid direct impacts to these ecologically significant areas. The DNR has offered alternative routes to avoid these areas and offers other alternatives in this review. In some instances there may be an opportunity to place the line closer to the edge of the proposed corridor or provide a slightly wider right of way corridor to minimize impacts.

Additional Recreation Analysis

Anticipated noise levels are not indicated in the document since transformers have not been selected

yet and other engineering considerations have not been determined. Noise levels can be heard in the vicinity of substations. It would be beneficial to know if there are increased noise levels and if audible distance will be increased from the substation as a result of the project.

Proposed routing provides only one alternative near Bass (31-316) and Larson (31-317) lakes in Itasca County. The proposed line would pass between these two lakes which each have public camping facilities. The attraction to this area of the George Washington State Forest is the remoteness, old growth pine un-fragmented forests and secluded lakes. This area is depicted in the mapbook on page 41 of 94. The Executive Summary under Cultural Values indicates that tourism is not likely to be affected by the transmission line; other route alternatives and further analysis of impacts to tourism in this area also should be explained.

Alternatives Screening

Minn. Stat. 116D.04(6): "No state action significantly affecting the quality of the environment shall be allowed, nor shall any permit for natural resources management and development be granted, where such action or permit has caused or is likely to cause pollution, impairment, or destruction of the air, water, land or other natural resources located within the state, so long as there is a feasible and prudent alternative consistent with the reasonable requirements of the public health, safety, and welfare and the state's paramount concern for the protection of its air, water, land and other natural resources from pollution, impairment, or destruction. Economic considerations alone shall not justify such conduct."

MN Environmental Rules require that DNR and other governmental units use environmental documents as guides in issuing permits and carrying out other responsibilities (4410.0300 & 4410.7055).

In order for the EIS to be effective as a guide in decision making (and to assist in documenting compliance with the above mentioned prohibitions); it is important that the EIS clearly document screening criteria used to determined practicality and feasibility of alternatives considered.

Approach to Mitigation of Project Impacts (adapted from CEQ guidelines)

General Comments:

The EIS should describe all impacts described in the application along with additional resource impacts described in this review. For all impacts; the mitigation discussion should be expanded to describe all of the following mitigation principles in descending order of priority (current mitigation discussions in the application focus on 1-3 below):

1. Avoiding the impact altogether by not taking a certain action or parts of an action.
2. Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
3. Rectifying the impact by repairing, rehabilitating, or restoring the affected environment.
4. Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
5. *Compensating for the impact by replacing or providing substitute resources or environments.

**For impacts considered major/significant*

Specific Comments:

Third Party Independent Monitors

It is our understanding that under the current proposal; only company Environmental Inspectors (EIs) will be used. Ensuring effective communication regarding permit conditions with the various subcontractors and across the multiple spreads is an enormous enterprise.

On past large utility projects, third-party agency monitors have been used to work with and supplementing agency field presence. These monitors would also satisfy reporting expectations, help to ensure that impacts to protected resources are avoided and/or minimized.

The EIS should regard usage of independent third party environmental monitors as an overall mitigation strategy. The DNR is also interested in discussing various models of funding and oversight for a third party monitors during this environmental review and routing process.

Access to DNR Administered Lands

- **The EIS should describe any impacts to accessing state administered lands.** This transmission line should not affect public / DNR access to state land. Following existing corridors could reduce this problem.
- DNR wild rice leases exist in the vicinity of the Waskish Area. Leaseholders have expressed concern about flights from the local airport being affected. **The EIS should assess project impacts on all airport related traffic (e.g. normal flights, agricultural chemical application, etc.).**
- Wildfire issues. More power lines running through forest land have a potential for igniting additional wildfires and therefore require a response to control them. **The EIS should acknowledge the potential for increased wildfires and necessary response actions.**

WMA Impacts

General Impacts:

The route alternative would traverse a number of DNR Wildlife Management Areas (WMAs). The EIS should describe why avoidance of each WMA is not feasible. **In order to better inform the DNR licensing process (and better meet the purpose of environmental review), we recommend that the EIS include specific information regarding the feasibility of route alternatives that avoid WMA crossings.**

Directly related, the EIS should also discuss how project routes comply with MN Rules 6135, which contain specific standards for route design. For crossings that are determined to be unavoidable (determined there is no feasible alternative route), the EIS should then assess impacts and the need for mitigation for each WMA. Following are a list of general WMA impacts that should be included in the EIS.

- Impacts to fire management/burning – Prescribed fire management is an important tool in maintaining and enhancing habitats on public lands in this area. Section 6.4.2 indicates that controlled burns are used in both Cedar Bend and Carp Swamp WMAs and that maintenance of vegetation would be accomplished by using mechanical methods rather than controlled burns. **The EIS should clarify that controlled burns are also used in Roseau Lake WMA and Roseau River WMA. The EIS should also clarify what impact to WMA management would result from the project.**

- Recreational usage
- Visual impacts

Specific WMA Uses, Resources and Impacts that should be included in the EIS:

Roseau River WMA

- RRWMA has been acknowledged to be an IBA (Important Bird Area) by Audubon.
- RRWMA contains an area of Preliminary Outstanding Biodiversity (as determined by the MN Biological Survey), which is contained largely within Pool 2 but extends to the eastern boundary or RRWMA. The primary feature of this area of outstanding biodiversity is a large fen complex, which contains rare plant and animal species associated with such habitats.
- An area of Preliminary High Biodiversity is located north and west of RRWMA headquarters. This area was an HCVF candidate, and is comprised of (1) a mix of aspen and jackpine forest with a significant component of oak and (2) a lowland conifer complex consisting of a mix of tamarack, black spruce, and white cedar with shrub inclusions of willow and alder. The proposed route of the transmission line, if within the WMA, would result in forest fragmentation detrimental to various species of forest Wildlife and would introduce invasive plant species where none currently exists.
- Another area of High Biodiversity occurs in Pools 1 East and 1 West. Waterbird assemblages that include up to 5 species of grebes, common loons, and trumpeter swan in open water areas that grade to assemblages of yellow rails and Nelson's sharp-tailed sparrow in the upper reaches of these pools are the primary features of this area. A transmission line near or within these habitats would have a detrimental effect on populations of species using these areas.
- The RRWMA pools are attractive to a number of species of birds during migration. Larger birds that soar into the pools from great distances and heights, such as bald eagles, Canada geese, snow geese, sandhill cranes, and American white pelicans, would be susceptible to mortality from transmission line collisions.
- A moist soils unit consisting of 6 cells containing ~110 acres was developed south and west of the headquarters in recent years. It primarily attracts ducks, geese and shorebirds and has provided a missing habitat component of shallow, food-rich wetlands in proximity to quality nesting cover. Dabbler duck production on Pool 2 has improved ever since the moist soils unit became operational. These benefits would be diminished by a transmission line nearby that would allow perch sites for predators and would fragment the shallow marsh habitat.
- A bald eagle nest exists in the middle of the moist soils unit cited above; the nest has been there for at least 15 years.
- Prescribed fire management is an important tool in maintaining and enhancing habitats on RRWMA. The transmission line would restrict the use of fire under and near the line. It is estimated that the use of fire as a management tool could be curtailed in up to 13 burn units covering ~1500 acres.
- The proposed route of the transmission line, if within the WMA, is in the heart of the most heavily used (all seasons) portion of the WMA. Hunting, deer antler shed hunting, trapping, berry picking, wildlife viewing, hiking, snowmobiling, snowshoeing, and cross-country skiing are among the activities enjoyed by the public. A controlled hunting zone for goose hunting that was developed decades ago exists along the southeastern boundary of the WMA.
- Invasive plant species, few of which are currently on the WMA (the ones that are under control) will increase within a transmission line ROW.

Roseau lake WMA

- Areas within this WMA are being considered for a large wildlife habitat enhancement/flood control project that would partially restore the historic Roseau Lake. Restoration of this lake bed would significantly increase bird and wildlife usage of this unit. Additional migrating birds may also be killed and/or injured by the additional line and tower collisions in this new location. **The EIS should consider impacts to the future planned restoration of the historic Roseau Lake.**

Great Gray Owls

The following information should be used to augment the EIS:

Great Gray Owls (Strix nebulosa) have been studied in Northern Roseau County for over 33 years. While not endangered, this owl is a nongame species of significance, both as a migrant and a breeding bird. Both breeding birds and winter visitors are present in greater numbers in this small corner of Minnesota than in any other location in the state.

A management plan was written in 1987 and updated in 2006 that provided management directions for an area that conformed to the Watershed Protection Area (WPA) of the Sprague Creek Peatland Scientific and Natural Area (SNA), and was also located within Lost River State Forest. Management recommendations included: 1) extended rotation in the lowland conifer types, 2) more intensive regular rotation management in traditional managed areas of the WPA, 3) less intensive management close to the SNA, and 4) a "reserve area" where nesting concentration was very high.

Additional Information regarding the Roseau Bog Owl Management Unit and Great Gray Owl Reserve Area can be found in plans written by Katie Haws entitled MANAGEMENT RECOMMENDATIONS FOR THE ROSEAU BOG OWL MANAGEMENT UNIT (1987) and the SPRAGUE CREEK PEATLAND WATERSHED PROTECTION AREA INTERIM MANAGEMENT PLAN FOR TIMBER AND GREAT GRAY OWLS (2006, attached).

Ecologically Important Lowland Conifers (EILCs) and Lowland Conifer Old Growth (LCOG)

The following information should be used to augment the EIS.

Currently the proposed pipeline routes cross at least 8 Ecologically Important Lowland Conifers (EILC) stands in Agassiz Lowlands and Littlefork-Vermillion Uplands Subsections; none in Chippewa Plains nor Pine Moraines subsections. It crosses at least 20 Lowland Conifer Old Growth (LCOG) provisional designated complexes (note, at least seven (7) of these are in WPAs also being crossed at that location).

The Department has a place-holder for old growth conifer forests found in lowlands. It is called Ecologically Important Lowland Conifers (EILC). We are responsible to manage these "placeholder" stands as if they are designated Old Growth (OG). Management in OG is generally not allowed. The exceptions are for management that will maintain the integrity of the old growth stand and its ecological function. Logging activities do not fit that definition and are not allowed. If roads/trails were in place through the OG stand prior to its designation and someone wants to use the road/trail again, then either an interdisciplinary team or the Regional Old Growth team makes a decision on acceptable use.

At this time, the Department is in the process of assessing and designating LCOG, which will replace EILC. Final designations will not likely be complete prior to this project going out for review. Currently, there is a set of provisional designated LCOG complexes. These provisional complexes will be "set-aside" with no management allowed until designations are finalized. Those complexes that become fully designated will follow the management guidelines in place for currently designated OG. Those

complexes that do not get designated will be released back to regular management, including standard forest management practices (unless there are other labels/designations upon these stands). The EIS should include this updated information. Please contact DNR Regional Ecologist Becky Marty at becky.marty@state.mn.us for the most current information about EILC and LCOG.

The DNR will provide a shapefile for EILC in the St. Louis Moraines, areas being considered for LCOG in the Nashauk Uplands, and LCOG in the Littlefork-Vermillion Uplands.

3. DNR Land and Water Crossing Licenses

The review and issuance of DNR land and water crossing licenses are coordinated by the Division of Lands & Minerals. The proposed project spans five counties in two DNR regions (NW and NE). The Lands & Minerals Regional Supervisor in Itasca and Koochiching County is Joe Rokala (218/999-7894) and the Lands & Minerals Regional Supervisor in the NW Region for Beltrami, Lake of the Woods and Roseau Counties is Cindy Buttleman (218/308-2627). When the route is more certain, we recommend that the project proposer schedule a pre-application meeting with Joe and Cindy to discuss administrative procedures for submitting the land and water crossing applications for this project.

The project proposer should allow adequate time for review and modification of the license applications. For most large projects, applicants submit draft license applications during environmental review and PUC permitting although the licenses will not be issued until those processes are complete.

The following information should be included in the license applications:

1. Length and width of each proposed state land and public water depicted on maps and plan sheets. Each crossing must be identified by legal description to the forty.
2. Clearing activities, construction methods, schedule, and staging of operations including equipment and materials storage proposed on state land or in public waters.
3. Permanent and temporary access routes to the proposed ROW crossing state land or public waters.
4. Temporary work areas on state land adjacent to the ROW that may be needed during construction. These areas should be clearly delineated and identified in the application materials.
5. Location of existing utility lines or transportation ROWs within or near the proposed ROW on state land or in public waters. Provide overview maps identifying the areas of co-location with existing utilities and a detailed map that shows the location of the Great Northern HVTL right-of-way in relation to the existing utility right-of-way on state lands.
6. State trails or Grant in Aid trails proposed to be crossed.
7. Location and design of tower structures including proposed installation methods and proposed plans for disposal of earthen materials resulting from the excavation of the tower footings.

8. Describe the conditions that would require geotechnical evaluations for tower placement on state land or public waters.
9. Construction plans that clearly describe how the licensee proposes to adapt their construction methods and schedule for different seasons and extreme seasonal weather changes in Minnesota such as extremes in snow cover, frozen conditions, extremely low temps, persistence of winter beyond normal ranges and the converse – hot, wet, and dry.
10. Restoration methods including proposed seed mixes and invasive species control measures.
11. Describe measures for minimizing rutting and the protocols for use of matting.
12. Identify the state land and public water crossings where flight diverters will be used and describe the type.
13. ROW maintenance methods and schedule on state land or in public waters.
14. ROW width needs to take into consideration current and future danger tree management.
15. ROW width needs to include the area necessary for guy wire anchors.

In addition, the project proposer should be aware of the following points related to the licensing of state land and public water crossings:

1. The licensee is responsible for invasive species management on the license area for the term of the license (50 years). The licensee must provide a plan for managing invasive species during the construction phase as well as over the license term. Because of the large amount of greenfield proposed to be crossed by this project, introduction of invasive species is a serious concern. The plan should describe methods for inventory, prevention, monitoring, and control on the license area.
2. Certain pesticides are restricted from use on certified forest lands. Written requests for herbicide or pesticide use on state lands is required and only approved herbicides will be allowed.
3. Use of native species for re-vegetation and clean weed free straw for mulch will be required on state land and public water crossings.
4. In-stream work on certain public waters (trout streams, for example) must be avoided at prescribed times to accommodate fish spawning.
5. Active nests or other features that have a no-disturbance window will need to be taken into consideration in the construction schedule.
6. The routes under review cross several types of state land including trust lands. DNR has a fiduciary responsibility to manage trust lands for the benefit of the school trust. The EIS should consider the general economic impact the power line ROW may have on the potential to generate future revenue for the trust.

7. State lands purchased with the assistance of various Federal grant programs will require mandatory federal aid review and approval before the license can be issued. Supplemental information from the applicant may be required for the federal review. If federal approval is required, additional time may be needed to process the application.
8. If a state land parcel becomes isolated due the construction of the ROW, the project proposer must provide access to the isolated state land across the ROW.
9. A monitoring fee will be assessed for DNR Lands & Minerals projected reasonable costs for monitoring the construction of the utility line and preparing special terms and conditions of the license to ensure proper construction. Independent environmental monitors may also be required during construction.
10. Permission for temporary access to the ROW across state land is considered a separate transaction and may be granted through a lease. Requests for temporary access are subject to review and approval, and in some cases may not be granted. Allow adequate time for processing access lease requests.
11. The applicant/licensee will be required to provide the licensor with as built drawings for state land and public water crossings upon completion of initial construction. The drawings for each crossing will be required to have forty lines and descriptions, utility ROW boundaries, structures and other utility improvements located on state land and public water crossings.
12. Site specific surveys and plans may be required if there are site specific resource concerns for certain crossings.

Proposed Public Water Crossings

Under Water Resources and Floodplains in the Executive Summary, the document indicates that Minnesota Power proposes to cross Grass Lake (31-144) in Itasca County and a PWI basin in Roseau County.

“Direct impacts on surface water resources likely will occur at the unnamed PWI basin in Roseau County and at Grass Lake in Itasca County. The span width of the unnamed PWI basing in Roseau County wetland is approximately 2,118 feet wide, which may require one or more structures to be placed within this basin. The span width of Grass Lake in Itasca County will be approximately 1220 feet, which may require one or more structures to be placed within this basin.”

Under Minnesota Rules we are to; “avoid lakes, but where there is no feasible and prudent alternative route, minimize the extent of encroachment by crossing under the water.” (Also see below).

There are regulations that limit the ability to cross public waters. Please refer to the following that pertains to these concerns. For a complete reference please refer to: LICENSES FOR UTILITY CROSSINGS OF PUBLIC LANDS AND WATERS ACCORDING TO MINNESOTA RULES CHAPTER 6135 [Rules Effective July 1, 2004].

6135.1000 PROTECTING THE ENVIRONMENT.

Subpart 1. **Policy.** It is essential to regulate utility crossings of public lands and waters in order to provide maximum protection and preservation of the natural environment and to minimize any adverse effects which may result from utility crossings. These standards and criteria provide a basic framework of environmental considerations concerning such a proposed crossing. The standards deal with route design, structure design, construction methods, safety considerations, and right-of-way maintenance.

Subpart 2. **Application content.** For each environmental standard listed in these parts, the applicant shall indicate whether the applicant is satisfying the standard, where applicable, or if not, why not. In dealing with route design standards, the application must, where applicable, also supply data on relevant site conditions. Except when the Commissioner determines that it is not feasible and prudent, or not in the best interests of the environment, the applicant shall comply with the following standards in designing, constructing, and maintaining utility crossings.

6135.1100 STANDARDS FOR ROUTE DESIGN.

Subpart 4. **Crossing public waters.** With regard to crossing of public waters:

- A. avoid streams, but if that is not feasible and prudent, cross at the narrowest places wherever feasible and prudent, or at existing crossings of roads, bridges, or utilities; and
- B. Avoid lakes, but where there is no feasible and prudent alternative route, minimize the extent of encroachment by crossing under the water.

Crossings on or under the beds of streams designated by the Commissioner as trout waters shall be avoided unless there is no feasible alternative. When unavoidable, maximum efforts shall be taken to minimize damage to trout habitat.

4. Route Alternatives and Segment Options Recommended for Inclusion in the EIS

As indicated in past correspondence, DNR encourages routing that would have the least amount of impacts to natural resources, outdoor recreation opportunities and sustainable commercial usages of natural resources. DNR also understands that as the MN Public Utilities Commission (PUC) permits specific routes for high voltage transmission line project (HVTLs), the PUC must consider broad range of potential impacts (beyond natural resources) and understands there are impact trades-offs with every route decision.

Prior DNR correspondence to Minnesota Power ALLETE highlighted concerns regarding new greenfield routes that increase impacts to natural resources. The Application for a Route Permit indicates that there has been an effort to avoid resources, for which the DNR is appreciative. However, in some areas it is clear that resources will be significantly impacted along the route. To provide options for mitigating impacts, the DNR provides the following route alternatives to consider for EIS analysis.

Including a variety of routes in the EIS (which provides an alternatives analysis and a way to demonstrate impact avoidance and minimization requirements) will assist decision makers in complying with requirements for avoidance and minimization (MN Stats 116D.04 Subd. 6) as well as requirements for equal consideration of environmental values, economics, and technical aspects in decision making (MN Stats 116D.03). **The DNR recommends the following routes be further analyzed in the EIS. The DNR is not advocating these routes as preferred routes. We wish to review further assessment of these routes in order to fully understand their impacts on natural resources.**

Note that alignments are approximate and the DNR intends that, except where otherwise stated, the customary route width be included in the EIS for analysis and flexibility of siting.

The DNR will provide shapefiles of alternatives to EIS writers. Also, see the attached resource maps showing additional resources not depicted in the figures below.

Co-Location Border Crossing Alternatives

The following figure shows existing border crossing locations for a Minnkota Power 230 kV and an Excel/Manitoba Hydro Interconnect 500 kV line. Use of either of these corridors (or a combination of the two) should be included for assessment in the EIS as they would:

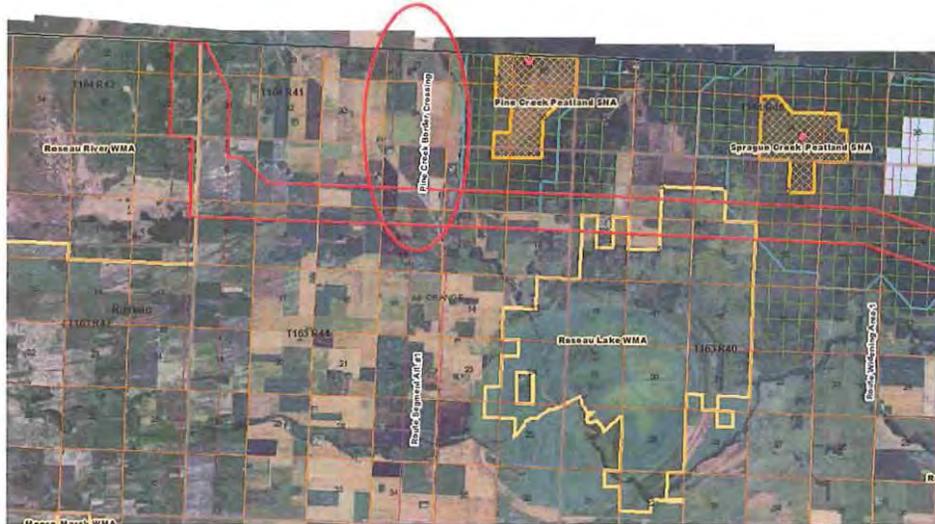
- Reduce overall Greenfield impacts by taking better advantage of existing corridors of disturbance (i.e. co-location).
- Avoid encroachment and associated impacts to the Roseau River and Roseau lake WMAs
- Avoid an Audubon Society Important Bird Area.
- Ecologically Significant Lowland Conifers (EILCs)
- Areas of Preliminary Biodiversity Significance ranked as Outstanding associated with Pine and Sprague Creek Peatland SNA's
- Watershed Protection Areas associated with fens in Pine Creek and Sprague Creek Peatland Scientific and Natural Areas (SNAs)



Pine Creek Border Crossing Alternative

This route segment alternative was originally considered as part of the applicant's project screening. This alternative should be carried forward for additional review in the EIS for the following reasons:

- Minimization of green field routing and associated impacts (e.g. fragmentation, habitat loss, etc.).
- Avoidance of high value resources such as WMAs, Peatland SNA WPAs, Areas of Preliminary Biodiversity Significance, HCVF, EILS, etc. (see attached Roseau County Resources Map).



Route Segment Alt. #1

This route segment alternative was originally considered as part of the applicant's project screening. This alternative should be carried forward for additional review in the EIS for the following reasons:

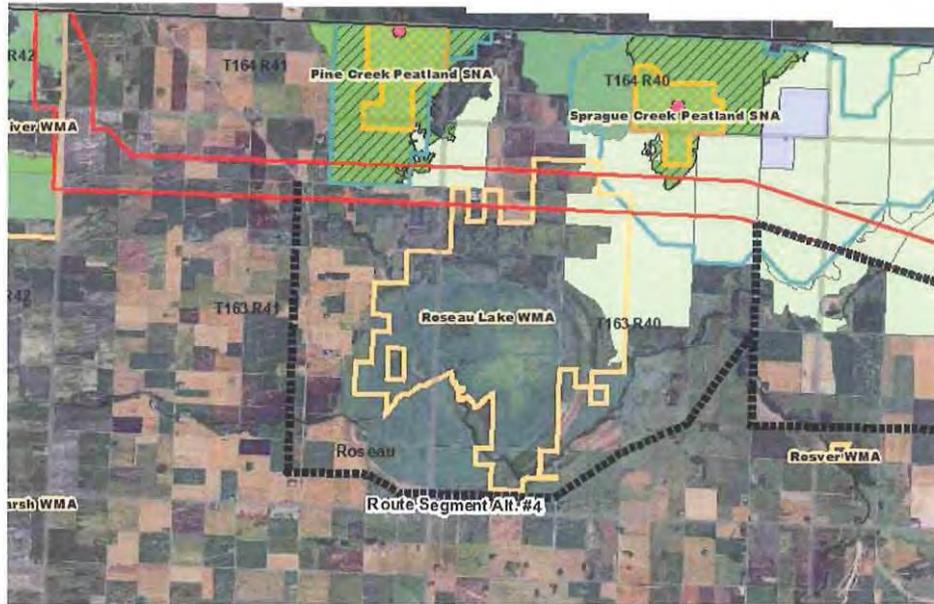
- Minimization of green field routing and associated impacts (e.g. fragmentation, habitat loss, etc.).
- Avoidance of high value resources such as WMAs, Peatland SNA WPAs, Areas of Preliminary Biodiversity Significance, High Conservation Value Forests (HCVF), Ecologically Important Lowland Conifers (EILC), etc. (see attached Roseau County Resources Map).



Route Segment Alternative #1A

This route segment alternative is a variation on Route Segment Alternative #1, and is intended to provide more options in the vicinity of the border crossing to balance natural resource impacts and other important siting criteria. This alternative should be carried forward for additional review in the EIS for the following reasons:

- Minimization of green field routing and associated impacts (e.g. fragmentation, habitat loss, etc.).
- Avoidance of high value resources such as WMAs, Peatland SNA WPAs, Areas of Preliminary Biodiversity Significance, HCVFs, EILCs, etc. (see attached Roseau County Resources Map).



Route Widening Area #1

This alternative should be carried forward for additional review in the EIS for the following reasons:

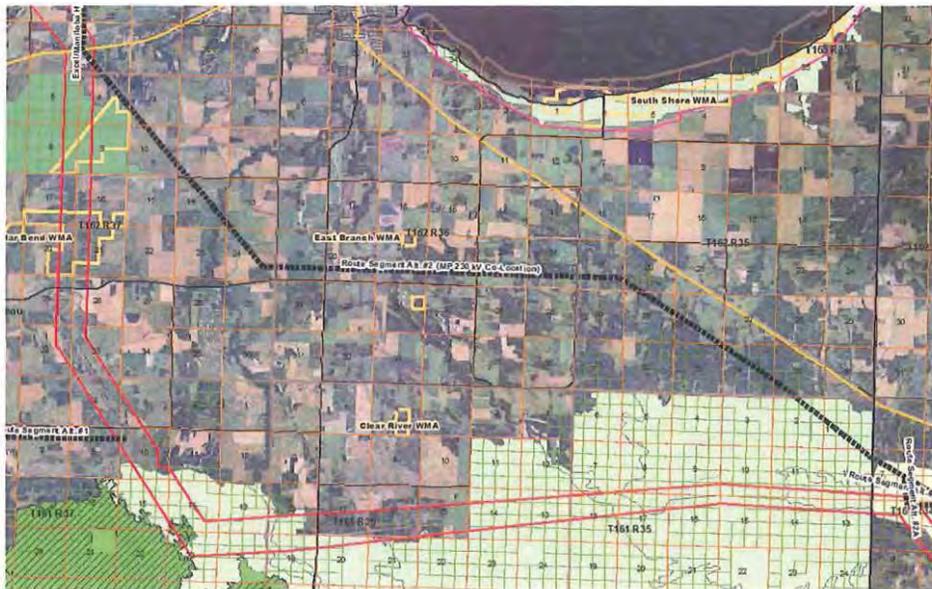
- Potential avoidance of more than 8 miles of green field routing and associated impacts (e.g. fragmentation, habitat loss, etc.).
- Allow for minimization of impacts to high value resources such Areas of Preliminary Biodiversity Significance (up to 8 miles of avoidance), Sprague Creek Peatland SNA WPA wetlands (1.5 miles), forestry lands, etc. (see attached Roseau County Resources Map).



Route Segment Alt. #2

This route would begin north of Cedar Bend WMA and travel southeasterly along an existing 230kV HVTL to a point near the Roseau County and LOTW County Border. From that point it could continue southeast along route segment #3 (see below) using Route Segment Alt. 2A or re-join the applicant Blue/Orange route. This alternative should be carried forward for additional review in the EIS for the following reasons:

- Allow for minimization of impacts and further fragmentation of high value resources such as Areas of Preliminary Biodiversity Significance (areas of outstanding, moderate, and high), wetlands, Cedar Bend WMA, and forestry land (~15 miles).
- An additional co-location option (would co-locate with an existing Minnesota Power 230 kV HVTL)



Route Segment Alt. #2A

Inclusion of the Route Segment Alternative provides flexibility to consideration a combination of route applicant and DNR proposed additional co-location alternatives.

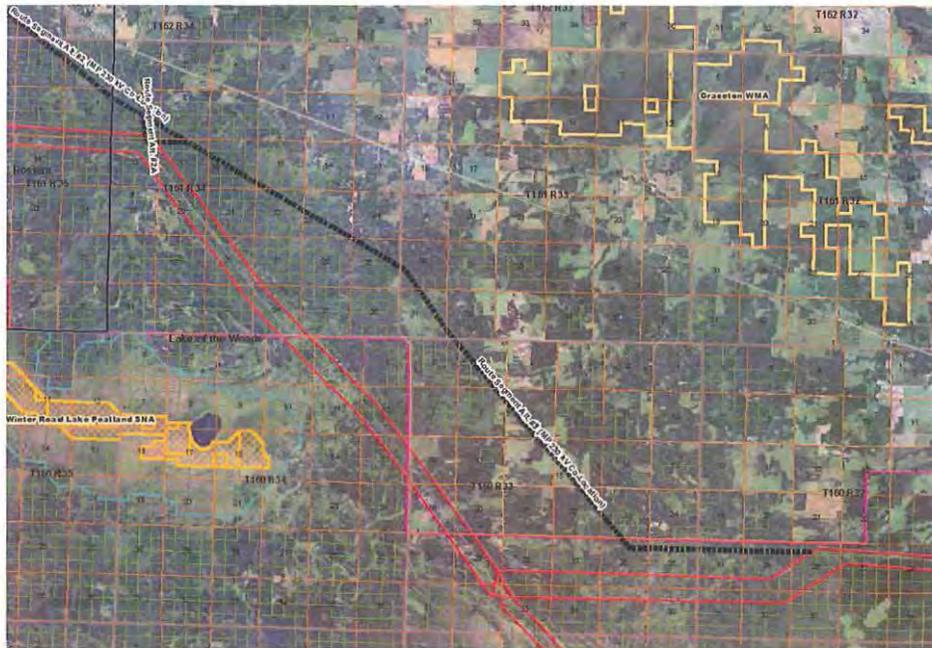


Route Segment Alt. #3

This alternative would either begin near the Roseau County and LOTW County border starting from the applicant's preferred Blue/orange Route or continue on from Route Segment Alt. #2 described above.

This alternative should be carried forward for additional review in the EIS for the following reasons:

- Continuation from Route Segment Alt. 2 into this Route Segment Alternative would avoid approximately 7 miles of green field crossing and associated impacts.
 - Applicants route includes a greenfield crossover in T160N, R33W, Sections 25-29 and T160N, R32W, Sections 28-30
- Using this route segment in combination with segment #2A would avoid approximately 6 miles of green field impacts (route segment 2A would re-introduce approximately 1 mile of greenfield impact).
- Avoidance and minimization of impacts to high value resources such as Important Bird Areas (~ 4mi. vs. 10 mi.), forestry lands.



The Effie Route

The DNR previously worked with Minnesota Power to review the Effie Route, depicted below, following an existing 230/500 kV transmission line. Minnesota Power did not carry the Effie Route forward to the application due to concerns about greater length and greater environmental impacts than the Orange or Blue routes. The DNR has reviewed a thorough point to point comparison provided by Minnesota Power and has remaining concerns regarding the proposed routes in the application in comparison to the Effie Route. The DNR would like to propose for further analysis the Effie Route discussed during early coordination for the following reasons:

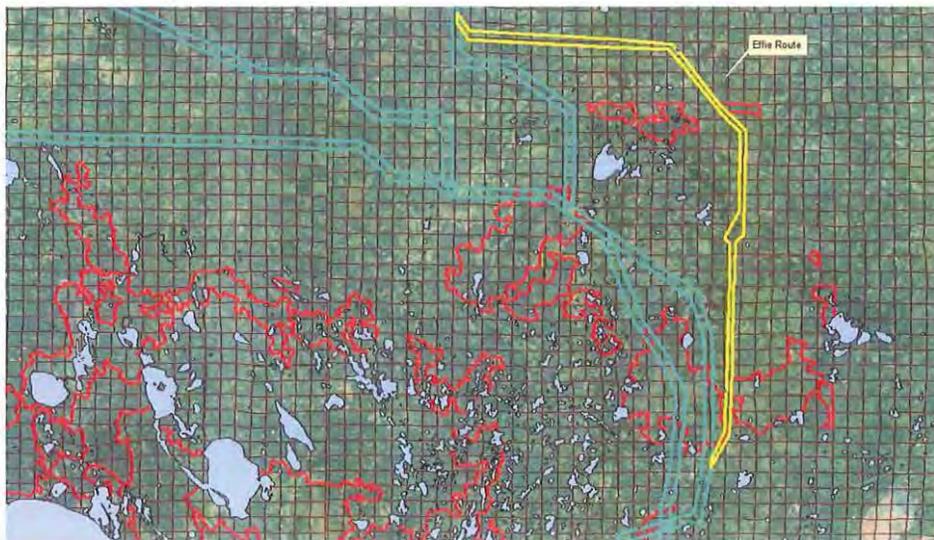
- Though the analysis previously provided describes increased impacts to natural resources and greater length, the results may not fully capture the impacts of the proposed Orange and Blue Routes due to fragmentation.
- Creating a new ROW in the area of the proposed routes may have more impact than increasing the size of the existing ROW along the Effie Route.
- Critical Habitat Impacts - The Effie Route contains the most critical habitat (i.e., this refers to USFWS critical habitat areas identified for the Canada Lynx). However, comparing the acres of critical lynx habitat impacted by each route is not an adequate comparison because the quality of the critical habitat that will be impacted is an important factor. The critical lynx habitat along the Effie Route is already degraded in quality due to the current fragmentation impacts of the existing transmission line. Whereas, the critical lynx habitat in the proposed routes is currently of higher quality because it is intact and not impacted by a transmission line corridor. The impact of creating a new ROW through critical lynx habitat is greater than the impact of increasing the size of the ROW through critical habitat that is already impacted by a transmission line.
- Wetland Impacts – Early coordination from Minnesota Power indicated that the Blue Route, Orange Route, and Effie Route will cross through 373, 349, and 412 acres of wetlands respectively. However, comparing the acres of wetlands impacted by each route is not an adequate comparison because the type of wetland that will be impacted is an important factor. The wetlands along the Effie Route are already impacted by an existing transmission line so they are already somewhat degraded in quality. Whereas the wetlands in the two proposed routes are currently intact, unfragmented wetlands with no transmission line impacts. Impacts of a new transmission line include fragmentation of habitat, decreased habitat value for wildlife, increased conversion of habitat (i.e., changes from forested wetlands to open or shrub wetlands), and risk of introduction of invasive species. The impact of a new transmission line through intact wetlands may be greater than the impact of adding a transmission line to a wetland that is already impacted by an existing transmission line.
- Old Growth Impacts – Early coordination with Minnesota Power indicated that the Effie Route will impact 41 acres of old growth. The impacts would occur in two separate old growth areas. One old growth area is on the east side of the Effie Route and the other is on the west side of the Effie Route. These old growth areas could be avoided by expanding the ROW in the opposite direction away from the old growth areas.
- Large Blocks of Forest Impacts - Impacts to large blocks of forest would be significantly reduced with the Effie Route. The blocks of forest that the Effie Route passes through are already fragmented due to the existing transmission line. Adding a new transmission line will increase the width of the ROW and the amount of impacted area, but these areas are already degraded

due to the existing transmission line. For the two proposed routes, blocks of forest that are currently not impacted would be opened up to fragmentation and edge effects. Impacts of a new transmission line include fragmentation of habitat, reduction of core habitat in adjacent forests due to edge effects, decreased habitat value for wildlife, increased conversion of habitat (i.e., from forest to grass or shrub areas), and risk of introduction of invasive species. The impact of a new ROW on intact forests may be greater than the impact of increasing the ROW in forests that already are impacted by fragmentation effects.

- Rare Resource Impacts - The two proposed routes will cut through two preliminary MBS sites: Coon Creek (Outstanding site) and Bear-Wolf Peatland (High site). These two sites contain significant biodiversity values. MBS sites are identified based on the occurrence of rare species, rare plant communities, and intact and high quality landscapes. The biodiversity significance of these sites will be impacted by the fragmentation impacts of a transmission line.
- Recreation Impacts - The proposed route passes near two lakes with public camping facilities (Bass 31-316) and (Larson 31-317 a designated trout lake) in Itasca County.

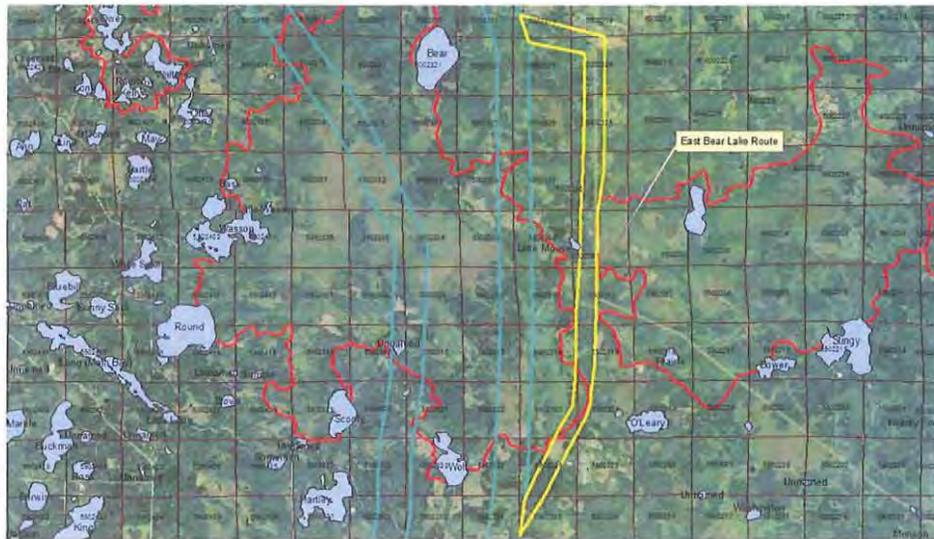
In summary, after reviewing summaries provided by Minnesota Power and GIS data, the Effie Route, following an existing transmission line, may have less impact on wildlife habitat including, impacts on wetlands, large blocks of forest, and preliminary areas of biodiversity significance. Strictly comparing number of acres impacted does not address the distinction between impacts to acres that are already degraded vs. impacts to acres that are intact and of higher quality. Therefore, the DNR recommends including the Effie Route in the EIS for further comparative analysis with the proposed routes.

The Effie Route would parallel the 230/500kv segment near Effie, Minnesota and connect back to the Orange Route in eastern Itasca County. Note that the connection back to the Orange Route may be slightly different than what was previously analyzed by Minnesota Power because the currently described alternative route attempts to avoid most of the Bear – Wolf Peatland Preliminary Site of Biodiversity as it connects back to the proposed Orange Route.



East Bear Lake Route

Using this connection east of Bear Lake (31-157) would nearly completely avoid a large preliminary MBS Site of high biodiversity significance (Bear-Wolf Peatland). This is approximately a 1 mile cross over to the existing 500/230 kv line and connecting back to proposed orange route right of way as described in the Effie Route alternative. A wide route width corridor is provided for flexibility. The route is in Townships 59 and 60 Range 23.

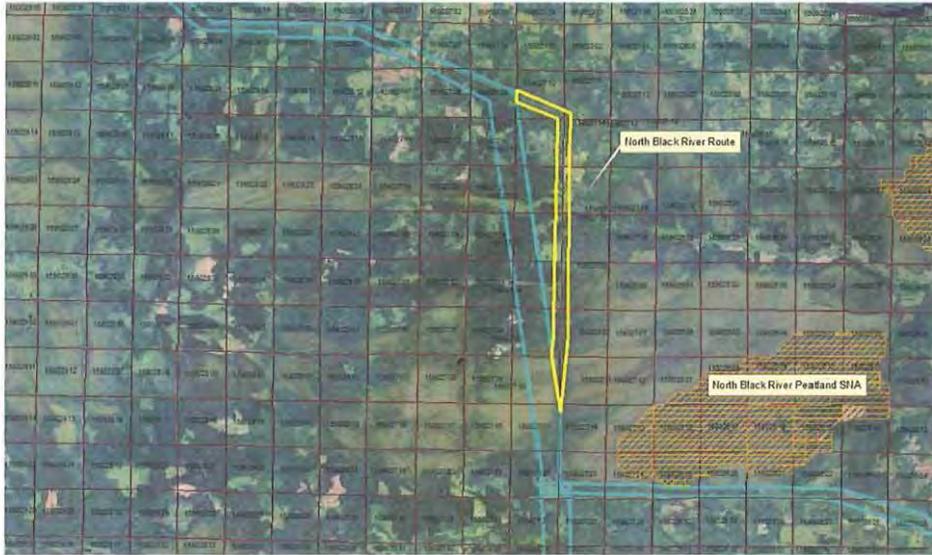


The North Black River Route

The DNR proposes analysis of the existing Minnkota Power 230 and 69 kv right of way (ROW) to minimize impacts to state owned minerals as well as fragmentation impacts to a nearby Scientific and Natural Area (SNA). The DNR has indicated Mineral concerns in this area and most recently habitat in the Watershed Protection Area in the adjacent SNA. Following the existing transmission route would reduce impacts to these resources.

- A six-township area in the vicinity of Township 159 North, Range 27 West has experienced repeated episodes of mineral leasing and exploration. Within this area the most frequent intercepts of mineralization have been encountered within Township 157 North, Range 27 West, and particularly within Sections 15, 16 and 21 of Township 159N, R27W, where eighteen exploratory boreholes have been drilled in parcels touching the B-0 route alternative. These boreholes, the most recent in 2011, have established at least two separate trends of zinc-copper or copper-nickel-platinum mineralization. It is very probable that exploration of these known occurrences will continue. This is the basis for the request to consider using existing corridor a mile further east of this site.

- Watershed Protection Areas (WPA) are important to adjacent SNAs and often contain similar habitat types. The Blue/Orange route crosses important habitats and is within the WPA of the North Black River SNA. The biodiversity significance of these sites would be affected by the fragmentation impacts of a transmission line. The impact of a new ROW on intact forests and wetlands is expected to be greater than the impact of increasing the ROW in areas that already are impacted by fragmentation effects. For these reasons, the DNR proposes analysis of the existing transmission line ROW. This route shown below in yellow.



Thank you for the opportunity to provide comments regarding the Great Northern Transmission Line Project. Please contact me with any questions.

Sincerely,

Jamie Schrenzel
Principal Planner
Environmental Review Unit
(651) 259-5115

Enclosures: 3

C: Julie Smith, US Department of Energy
Christopher Lawrence, US Department of Energy
Michael Kaluzniak, MN Public Utilities Commission
Bill Baer, US Army Corps of Engineers
Jim Atkinson, Minnesota Power

COMMENTS SUBMITTED

RED LAKE BAND OF CHIPPEWA INDIANS

Aesthetics

According to the Draft EIA, the ROI for long-term impacts on aesthetics is 1,500 feet on either side of the anticipated alignment of the proposed routes and variations and within 1,500 feet from the footprint of the proposed Blackberry 500 kV Substation. The estimation of distance is far too lenient in terms of visual disturbances and impacts to region aesthetics.

Studies conducted by the US Bureau of Land Management for other similar projects have shown that facilities for 500kV lattice structures were visible to the unaided eye at a maximum distance of approximately 17 mi (27 km).¹ They also were judged to strongly attract visual attention at distances of up to 3 mi (5 km).² The results of this study have important implications for determining appropriate distances from transmission facilities for visual impact assessments, and for the siting of transmission facilities to reduce visual impacts on visually sensitive lands, such as those Red Lake Tribal lands in the vicinity of the Great Northern Transmission Line. The BLM ultimately recommended a minimum distance for visual impact analysis for 500 kV lattice tower facilities to be 10 mi (16 km), and a more conservative distance would be 12–13 mi (19–21 km).³

Prior to implementation of the project, coordination should be completed with the Red Lake Nation Department of Natural Resources and Tribal Historic Preservation Office to ensure that visual impacts to Tribal lands are mitigated adequately or that in places where visual impacts could have a disturbance that measures are taken to reduce visual elements that would increase contrast and observation of the towers by casual viewers.

¹ BLM, 1986a, Visual Resource Contrast Rating, BLM Manual Handbook 8431-1, Release 8-30, U.S. Department of the Interior, Washington, D.C.

² BLM, 1986b, Visual Resource Inventory, BLM Manual Handbook 8410-1, Release 8-28, U.S. Department of the Interior, Washington, D.C.

³ BLM, 2013, Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands, Bureau of Land Management, Cheyenne, Wyoming. 342pp. April.

0195-1

As stated in Section 5.3.1.1, "The 1,500 foot ROI for aesthetic resources was identified because the proposed Project is *most likely* to be visible within this near-foreground distance zone and views of the proposed Project from aesthetic resources within this distance zone have the *greatest potential* to result in visual impacts for sensitive viewers" (*emphasis added*). The EIS also states, in Section 5.3.1.1, that "Aesthetic impacts are likely to be greatest for views of the proposed Project in the foreground distant zone (i.e., up to about 0.5 miles from the proposed Project), but impacts can also be substantial for views from greater distances." Thus, 1,500 feet provides a reasonable distance within which aesthetic resources may be identified and compared for the different route variations and modifications to assess potential aesthetic impacts, but the EIS does not identify that aesthetic impacts would only occur within this distance. In addition, while distance is an important factor in determining the level of aesthetic impact, a variety of other factors in combination contribute to determining aesthetic impacts. As stated in Section 5.3.1.1, "Impacts on aesthetics are assessed based on the extent of changes to landscape character and scenic quality, the level of contrast introduced by the proposed Project, its proximity to viewers, and the visual sensitivity related to views of the proposed Project."

In Section 2.13, the EIS identifies Applicant proposed measures to minimize potential environmental impacts, including aesthetic impacts, that could be implemented to minimize aesthetic impacts on Red Lake Tribal lands. These include, among others:

Design to minimize visible impacts at specific sites (e.g., travel ways, recreation sites, Big Bog State Recreation Area, and bodies of water with access and residences);

Shifts in alignment to avoid construction over existing wells, aesthetic impacts, floodplains, wetlands and bird concentration sites to the extent practical and avoidance of cultural resources in accordance with the PA;

Adjustment of span and pole placement to avoid waterways (perpendicularly), wetlands, sensitive resources, and transportation corridors to the extent practical and to avoid of cultural resources in accordance with the PA; and

Agency Coordination in development of the PA with DOE and consulting parties.

Additionally, the PA that is developed for the proposed Project in accordance with Section 106 of the National Historic Preservation Act (NHPA; 36 CFR 800.4(b)(2)) will ensure that the definition of the APE within which cultural resources investigations will be

0195-1

conducted to identify cultural resources (including traditional cultural properties), evaluate their NRHP-eligibility, and mitigate any adverse effects on historic properties if appropriate, will include the entire construction footprint for the proposed Project. It is anticipated that through the PA, DOE, the Applicant, and other appropriate parties will continue to coordinate with the Red Lake Nation Department of Natural Resources and Tribal Historic Preservation Office regarding minimizing aesthetic impacts to Tribal lands.

No changes are made to the EIS in response to this comment.

Possible Effects on Game Species (Ungulates)

The Red Lake Band foresees four possible negative influences on ungulates from the established power line: 1) physiological effects from electromagnetic fields; 2) disturbing noise originating from electrical discharge or wind action on lines or masts; 3) frightening visual effects from physical structures and disturbances from installation, monitoring and maintenance work on the lines; and 4) higher incidents of predator takes that could result from access and movement along cleared powerline corridors.

Data supporting these possible effects can be found in research conducted in several European studies, such as one that detailed powerline effects on moose⁴, deer⁵, and other species⁶.

Any (or all) of these factors could affect game movements in areas that could affect the ability of the Red Lake Band of Chippewa and its members to exercise traditional hunting on lands surrounding the Great Northern Transmission Line.

To our knowledge, no observational report exists that records and evaluates the long-term effects of large-scale powerlines on ungulate and other animal species. In view of the plans for new transmission lines and reinforcement of current lines, we believe that such information is urgently needed and may require long-term monitoring. Such monitoring should be noted in the Final EIS and any measures should be coordinated with the Red Lake Band of Chippewa Department of Natural Resources and Minnesota Department of Natural Resources.

The above recommendation should be included as a mitigation measure for Wildlife Resources.

0195-2

0195-2

Thank you for providing this information. The references are added to Chapter 9 of the EIS. We have reviewed the documents that you referenced regarding ungulates and smaller animals and their use of transmission line corridors. The studies indicate that ungulates cross transmission line corridors unlike road corridors which act as barriers. Predators may use the corridors more often which would deter use by ungulate and other smaller animals. In addition, animals with young will avoid corridors of any type because they don't provide cover for their young to hide from predators. The results are inconclusive for reindeer for the selected study areas - but there were extenuating circumstances (roads and dams) which may limit their need to cross the transmission line corridors. The documents provide some methods to reduce the effects of corridors on ungulates, which primarily involve returning the corridor back to an intermediate level of successional forest that provides more habitat (cover, food, etc.).

Following full review of the studies pointed to by the commenter for any new information relevant to the proposed Project, no changes are made to the EIS in response to this comment.

⁴ Bartzke, Gundula S., 2014, Effects of power lines on Moose (*Alces alces*) habitat selection, movement, and feeding activities, Norwegian University of Science and Technology, Department of Biology, Trondheim.

⁵ Bartzke, Gundula S., 2014, The effects of power lines on ungulates and implications for power line routing and rights-of-way management, Norwegian University of Science and Technology, Department of Biology, Trondheim.

⁶ Bevinger, K., et.al, 2010, Optimal design and routing of powerlines; ecological, technical and economic perspectives, Norwegian Institute for Nature Research, Trondheim.

Temporary Access Roads and Staging Areas

It is stated that the Applicant will have to construct temporary access roads outside of the ROW. It should be clearly detailed how the Applicant will ensure that these temporary roads do not become permanent roads that could lead to a change in land use patterns or otherwise affect resources. It must be clearly stated how long “temporary” is (i.e. months? years?).

Plans for mitigation and restoration of these roads back to their previous state should also be discussed. In addition, effects to cultural and natural resources should be addressed through survey and possible mitigation for these temporary roads and staging areas.

0195-3

0195-3

Section 2.13 describes applicant proposed measures to minimize environmental impacts, including restoration measures. As part of the wetland permitting process, USACE and MnDNR typically issue permit conditions that establish a timeframe for which temporary project features, such as access roads, may be left in place.

No changes are made to the EIS in response to this comment.

GTNL website comments report

These comments were submitted via the comment form on Great Northern Transmission Line EIS website[<http://www.greatnortherneis.org/Home/Comments>]

ID	42
ProjectPhase	DEIS
Comment	<p>I am a landowner located inside of the West Section, Scoping decision route running west to east between highway 89 near Dieter township and 310 in Roseau. The property I own is near CR-123 and 28 including farmland, homes, drying and storage warehouses and an active use Quonset. The current proposed route would affect several of our farming properties including the other structures I have just mentioned and future planned building sites. Please remove this route from consideration as this would greatly effect the operations of our farming including the lives of the people living in the homes at CR-123 and 28.</p> <p>I am proposing that the line either be moved, removed or run east to west further north near the border to minimize private property</p>
File	
FirstName	Terry
LastName	Kveen
Email	terrykveen@yahoo.com
Org	
Title	
Addr1	N69 W20473 Orchard Ct
Addr2	
City	Menomonee Falls
State	WI
Zip	53051
Country	US
ContactPref	Email
Protect	YES
Date	2015-07-09 11:25:51.620

0198-1

Thank you for your comment. Once a route is selected and a permit is issued, the Applicant would contact landowners to gather information about their property and their concerns and discuss how the ROW would best proceed across the property.

No changes are made to the EIS in response to this comment.

0198-1

GTNL website comments report

These comments were submitted via the comment form on Great Northern Transmission Line EIS website[<http://www.greatnortherneis.org/Home/Comments>]

ID	45
ProjectPhase	DEIS
Comment	Please be aware that the proposed routing nearest Hiway 65 a0pproximately 5 miles south of Littlefork negatively impacts pilots using the private airstrip located there. Any of the routings farther west would be preferable.
File	
FirstName	Mark
LastName	Meester
Email	mmeester@bartlettassociates.com
Org	
Title	
Addr1	501 Third Street
Addr2	
City	INTERNATIONAL FALLS
State	MN
Zip	56649
Country	US
ContactPref	Email
Protect	
Date	2015-08-10 10:46:58.683

0199-1

The EIS identifies airports and airstrips near the alternatives and potential impacts in Chapter 6.

No changes are made to the EIS in response to this comment.

| 0199-1

GTNL website comments report

These comments were submitted via the comment form on Great Northern Transmission Line EIS website[<http://www.greatnortherneis.org/Home/Comments>]

ID	43
ProjectPhase	DEIS
Comment	With regards to the alignment of the proposed power line in the area east of Wasson Lake (approximately T.59N / R.23W), co-locating the line (Red Route) with the existing line(s) that follows Highway 65 would be the best and least impactful - visually and otherwise. At minimum, I feel that for a modest cost by moving the route from Blue to Orange the protection of a highly significant area of biodiversity (see Map 5-23) can be better served. Thank you.
File	
FirstName	John
LastName	Hoshal
Email	jachmjf@msn.com
Org	
Title	
Addr1	3820 Edmund Blvd.
Addr2	
City	Minneapolis
State	MN
Zip	55406
Country	US
ContactPref	Email
Protect	Yes
Date	2015-08-09 22:56:10.517

0200-1

Thank you for your comment. Potential impacts to MBS Sites of Biodiversity Significance are discussed in Section 5.3.5.

No changes are made to the EIS in response to this comment.

0200-1

July 23, 2015

Bill Storm
Environmental Review Manager
MN Department of Commerce
85 7th Place East, Suite 500
St. Paul MN 55101



RE: Great Northern Transmission Line: TL-14-21

Dear Bill Storm

With all due respect, I oppose the Minnesota Public Utility Commission's proposed Balsam Variation alternative route of the Great Northern Transmission Line for the following reasons:

1. The Balsam Variation route is not cost effective compared to Minnesota Power's preferred Blue Line route. The Blue Line route, as you know, is a straight line route. The Balsam Variation route zig-zags to take advantage of a 65 foot right-of-way that currently exists. However, an additional 135 feet of right-of-way will still have to be cleared to accommodate the new transmission line.
2. The Advisory Task Force appointed for this project indicated that minimization of impacts to private land and landowners were a priority and the Balsam Variation route developed during Scoping does not satisfy this recommendation. The Balsam Variation route would impact a lot more private land and landowners than the Blue Line route.
3. Also, the Balsam Community Center, Balsam Volunteer Fire Department, Balsam Bible Chapel, parsonage, community playground, tennis courts, softball/baseball field would all be included in the middle of the Balsam Variation right-of-way.
4. As a part owner of 84 acres of undeveloped property located entirely within the Balsam Variation right-of-way, which includes approximately 3,000 feet of undeveloped lakeshore, I am concerned about the impact this new transmission line would have the valuation of our property.
5. In addition, I would like to know what impact this transmission line would have on our ability to sell our property at fair market value should we decide to sell at some point in the future.
6. Minnesota Power's intent was to design the transmission line route to maximize separation from existing homes and cabins. The Blue Line accomplishes that goal. The Balsam Variation route right-of-way would run right behind my family's hunting shack which is on a hill overlooking Snaptail Lake.
7. The transmission line is capable of producing an audible noise produced by corona discharges from transmission line conductors. Minnesota Power states that this noise, which resembles a subtle crackling sound is typically only within the threshold of human hearing during rainy or foggy conditions. They also stated that during light rain, dense fog, snow and other times there is moisture in

0202-1

The EIS provides cost comparisons for the proposed routes compared to the variations in Chapter 6. Cost or cost effectiveness is not usually treated as an impact in DOE EISs but is used in considering practicability, such as for determining reasonable alternatives. All alternatives will require new ROW for its entire length. While some alternatives parallel existing transmission lines, none of the alternatives share ROWs with existing transmission lines.

No changes are made to the EIS in response to this comment.

0202-2

Comment noted. The EIS analyzes potential impacts to land use and land ownership for each alternative in the range of reasonable alternatives.

0202-1

No changes are made to the EIS in response to this comment.

0202-3

0202-2

As shown Map 120 in Appendix S of the EIS, these facilities are located within the Balsam Variation route width, not the ROW.

No changes are made to the EIS in response to this comment.

0202-3

0202-4

0202-4

A discussion about the potential effects of transmission lines on property values is included in the EIS in Section 5.2.1.4. This includes a summary of the potential range of property value effects attributed to transmission lines. Further, Appendix J, Property Values Supplement provides a summary of the literature regarding the relationship between transmission lines and property values used to develop the property values analysis in Section 5.2.1.4.

0202-5

No changes are made to the EIS in response to this comment.

0202-6

0202-5

Comment noted.

No changes are made to the EIS in response to this comment.

0202-6

Noise levels from corona discharge are discussed in Section 5.2.1.2 of the EIS and would not be expected to adversely impact hunting. Impacts to hunting are not expected to be impacted by the proposed Project. Studies regarding ungulates and smaller animals and their use of transmission line corridors indicate that ungulates cross transmission line corridors unlike road corridors which act as barriers. Predators may use the corridors more often which would deter use by ungulate and other smaller animals. In addition, animals with young will avoid corridors of any type because they don't provide cover for their young to hide from predators. The results are inconclusive for reindeer for the selected study areas - but there were extenuating circumstances (roads and dams) which may limit their need to cross the transmission line corridors. The documents provide some methods to reduce the effects of corridors on ungulates, which primarily involve returning the corridor back to an intermediate level of successional forest that provides more habitat (cover, food, etc.).

No changes are made to the EIS in response to this comment.

the air, the proposed transmission lines may produce audible noise higher than the background noise levels in some rural areas. Deer hunting on our property has been a tradition for over 50 years and I am concerned how this will impact my family's deer hunting success in the future.

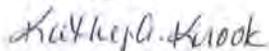
8. From a health and safety point of view, Minnesota Power also refers to "induced voltage", which occurs when an electric field reaches a nearby conductive object, such as a vehicle or metal building and it induces a voltage on the object. Then, if the object is insulated or partially insulated from the ground and a person touches that object, a small current would pass through the person's body to the ground. This might be accompanied by a spark discharge and mild shock, similar to what can occur when a person walks across a carpet and touches an object. Minnesota Power states induced voltage normally is not a problem. Again, this transmission line will impact my family's hunting land due to the fact that it will reduce the amount of land my family will be able to hunt on.

Summarizing noise and potential voltage (shock) issues, we find it hard to believe that these are NOT health issues. One of our deer hunters was never comfortable with the emissions from the old power line and a new higher voltage power line would, in her mind, make that area unusable for anything including deer hunting.

9. When Minnesota Power removed the existing transmission line, they told us we could do whatever we wanted to do with our property, such as plant trees. Trees along with an apple orchard were planted and we had every intention of using our property to its fullest. Now, once again, we face the threat of not being able to use our property the way we want to.
10. There is an existing osprey nest on the property adjoining our property and if you were to drive where roads/highways intersect with the proposed power line right-of-way, you would see a great number of nesting sites.

Based on the reasons stated above, I am respectfully asking you to remove the Balsam Variation from consideration for the Great Northern Transmission Line.

Thank you!



Kathy Krook
2362 Diane Ln
Grand Rapids MN 55744

41259 Scenic Highway
Bovey MN 55709

0202-6 cont'd

0202-6
Continued

0202-7

0202-7

Section 5.2.2.4 in the EIS discusses induced voltage. Section 5.2.1.2 of the EIS presents the estimated audible noise levels from the from the proposed 500 kV transmission lines under rainy conditions (worst case scenario for noise generated from corona effect). Section 5.2.2.8 of the EIS discusses public safety hazards associated with the proposed Project including electrical shocks.

No changes are made to the EIS in response to this comment.

0202-8

As discussed in Section 1.3.1.4 of the EIS, once a route is selected and a permit is issued, the Applicant would contact landowners to gather information about their property and their concerns and discuss how the ROW would best proceed across the property.

0202-8

No changes are made to the EIS in response to this comment.

0202-9

0202-9

As discussed in Section 2.11.1 of the EIS, the Applicant would incorporate industry best practices to minimize impacts to migratory birds, which are consistent with the Avian Powerline Interaction Committee (APLIC's) 2012 guidelines. In addition, the MN PUC Route Permit could require that the Applicant develop and implement an Avian Protection Plan. The Applicant would coordinate with the MnDNR and other appropriate agencies in the development of an Avian Protection Plan.

No changes are made to the EIS in response to this comment.

0203-1

Thank you for your comment. Please refer to comment 0183 for responses to the email on page 2.

Sent: Monday, August 10, 2015 10:31 PM
To: kepeters@midco.net; bill.storm@state.mn.us; Smith, Julie A (OE) <JulieA.Smith@hq.doe.gov>
Cc: don.peterson72@gmail.com; jtpeterson2010@gmail.com
Subject: Re: DEIS comments

Awesome! great work!

Anne Marguerite Coyle (Margi)

-----Original Message-----

From: kepeters <kepeters@midco.net>
To: bill.storm <bill.storm@state.mn.us>; juliea.smith <juliea.smith@hq.doe.gov>
Cc: Anne Marguerite Coyle <flyfreege@aim.com>; Don Peterson <don.peterson72@gmail.com>; jason Peterson <jtpeterson2010@gmail.com>

0203-1

Sent: Sun, Aug 9, 2015 3:12 pm
Subject: DEIS comments

Hello Mr. Storm and Dr. Smith,

In reference to Docket number TL-14-21 and DOE number EIS-0499.

I have reviewed the DEIS for the Great Northern Transmission Line and offer the following comments:

On Summary page 15- There's a statement that says the line is not expected to affect property values and cites a couple of references. I wonder if these studies included recreational property? From my perspective, the value of my property will be greatly diminished if this power line is constructed on or near my property. Things such as solitude and views unobscured by power lines may be hard to put a value on, but affect the things I value about my property nonetheless. I'd like to see more discussion and recognition of the impacts of the proposed power line on these types of values.

I am most familiar with the area near my property (T. 63 N. R. 27 W, S. 35, SE of SE) as I have recreated in this area for 20 years. A lot of timber has been harvested in this area in the past 15 years, resulting in large blocks of younger aged forest. Much of the remainder is old-growth cedar which provides thermal protection for deer in the winter and moose in the summer. The proposed route (Orange) goes right through one of the largest such stands of cedar in the area. This stand provided critical habitat for deer during the recent harsh winters, in fact was the only place you could find a deer track during the winter months. The Cutfoot variation would save one of these stands, but would impact another equally important stand located just to the south. The statement in S.10.2.8 "...proposed orange route has less potential impact on critical habitat designated for grey wolf " seems based solely on the fact that the Cutfoot variation is slightly longer. Instead, the amount of critical habitat affected by both routes should be measured (quantified) so that a meaningful comparison between the two routes can be made. Taking this a step further, I'd like to see a similar comparison between the Orange and Blue routes (i.e. which route will have more or less impact on old growth cedar stands which provide critical habitat for many species of wildlife including grey wolf.

On summary page 55 S.11.2.4 Natural Resources: In my opinion, the summary understates the localized impacts to wildlife. If critical habitat is lost (e.g. old-growth cedar stands are converted to open right-of-ways which fragment the forest and provide no thermal cover the wildlife that lives there will be negatively impacted. Fewer deer will survive the harsh winters, ultimately resulting in fewer wolves. I'd like more discussion of these potential impacts in the DEIS.

Thank you for the opportunity to comment.

Regards,
Kevin

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DOCKET NUMBER 1421

Bill Storm
MN Department Of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101

Carol Kveen
N69 W20473 Orchard Ct.
Menomonee Falls, WI 53051

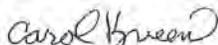
Dear Bill Storm,

My Name is Carol Kveen and I am a landowner located within the east to west Scoping Decision Route on and south of the Roseau River near roads 28 and 123. I would ask that my property be removed from the route for consideration. I do however question why the route is being run into the United States in the manner it is. It would seem to me it would be better to run through the land in Canada East to West before needing to be run south through private land in the United States. This would remove the majority of the privately owned land inside the United States and remove a majority of the objections of the landowners affected by this.

I do realize the Advisory Task Force is attempting to minimize the impacts to private landowners and I hope my recommendation assists in this. Under the current route I have several properties, including a Quonset with nearby homes.

Thank you for your consideration,

Carol Kveen



0204-1

Thank you for your comment. No changes are made to the EIS in response to this comment.

0204-1

RECEIVED

MAY 21 2015

MAILROOM

DOCKET NUMBER 1421

Bill Storm
MN Department Of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101

Tim Kveen
1920 Sunkist Ave
Waukesha, WI 53188

0205-1

Thank you for your comment. No changes are made to the EIS in response to this comment.

Dear Bill Storm,

My Name is Tim Kveen and I am a landowner located within the east to west Scoping Decision Route on and south of the Roseau River near roads 28 and 123. I would ask that my property be removed from the route for consideration. I do however question why the route is being run into the United States in the manner it is. It would seem to me it would be better to run through the land in Canada East to West before needing to be run south through private land in the United States. This would remove the majority of the privately owned land inside the United States and remove a majority of the objections of the landowners affected by this.

0205-1

I do realize the Advisory Task Force is attempting to minimize the impacts to private landowners and I hope my recommendation assists in this. Under the current route I have several properties, including a Quonset with nearby homes.

Thank you for your consideration,

Tim Kveen



RECEIVED
MAY 21 2015
MAILROOM

From: Bill latady [mailto:blatady@boisforte-nsn.gov]
Sent: Tuesday, July 21, 2015 09:50 AM
To: Smith, Julie A (OE)
Subject: UTAC Traditional Properties Survey.fn1

Julie;

Please find attached three examples of traditional properties surveys conducted by the Bois Forte Band at iron mine extension projects. Two were conducted for MinTac and one for UTac. Both mines are within ceded territory (1854 Treaty). Clearly, the projects are not within any of the proposed GNTL rights-of-way, but as you are aware the concerns expressed by the interviewees extend to any project within ancestral territory. I hope the remainder of your week goes well and the public meetings are well attended. Thanks for coming to Bois Forte to consult with the Bois Forte Band.

Bill

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0206-1

Thank you for your comment and information. Chapter 5 and 6 discussions related to cultural resources, as well as those discussions about traditional and subsistence use of vegetation and wildlife resources, are updated to include this information.

0206-1

Identification of Historic Properties of
Traditional Religious and Cultural Significance to
The Bois Forte Band in the Minntac Progression Project
Area of Potential Effect

By
William R. Latady
Marybelle Isham

Bois Forte Tribal Historic Preservation Office
1500 Bois Forte Road
Tower, MN 55790

September 2013

Prepared for
United States Steel Corporation
Minnesota Ore Operations
PO Box 417
Mt. Iron, MN 557686
Hoyt Lakes, MN 55750

Introduction

This report presents the results of a survey to identify historic properties of spiritual and cultural significance to the Bois Forte Band within the Minntac Progression project Area of Potential Effect (APE). The survey was conducted by interviewing Bois Forte elders during April and May 2013.

In the fall of 2012, a Programmatic Agreement was developed among the St Paul District Corps of Engineers, the Minnesota State Historic Preservation Office (SHPO), the Bois Forte Band of Ojibwe, the Grand Portage Band of Ojibwe, the Fond du Lac Band of Ojibwe and U.S. Steel concerning the western progression of the Minntac Taconite Mine to address concerns about Historic Properties that will be affected by the project. The document was signed in December 2012 by the Corps of Engineers and Minnesota SHPO. Work began after the agreement created by the Bois Forte Tribal Historic Preservation Office (THPO) was approved by the Reservation Tribal Council and US Steel in April 2013.

In an effort to help US Steele comply with federal regulations to identify and document historic properties of traditional religious and cultural significance to Tribes, the Bois Forte THPO proposed to document places visited by Band members. The proposal grew out of consultation between the Ojibwe Bands and the US Army Corps of Engineers. The survey was designed to document and evaluate historic properties of significance to the Band within the APE located near Mountain Iron in St Louis County, Minnesota. These properties include, but are not limited to, off-reservation treaty resources within the 1854 Ceded Territory, such as maple sugaring areas, wild rice waters, sites with spiritual significance, trails, village sites, fishing areas and other places where usufructuary rights are practiced.

Project Setting

The project area is located on the southern flank of the Mesabi Iron Range near Mountain Iron in St Louis County. The first surveyors employed by the US Government to survey the area where the Minntac Mine and APE are now located described the Townships as well timbered with aspen, birch, pine, spruce and tamarack. The surveyor's notes go on to state that the land is rolling to broken with swamps between ridges, dense undergrowth and poor soils. The sole exception was T60N, R18W where much of the timber had been destroyed by fires that ravaged the area several years before the survey.

Wildlife typically found in this area includes black bear, white tail deer, ruffed grouse, small mammals and migratory birds including ducks and geese. Water bodies including Sandy Lake, the Dark River and Sand River contain a variety of fish including bluegill, crappie and northern and walleye pike. Many, if not all of the taxa, are economically significant to Bois Forte Band members, and in some instances have special spiritual import. Wild rice was once abundant in Big and Sandy Lakes (Twin Lakes).

Methods

Obtaining information on historic properties of religious and cultural significance to Indian tribes is complex. Sharing information on resources that comprise cultural identity with outsiders is carefully considered by tribal members because history has shown the information may be misused and exploited at the expense of the individual, tribe or resource. In some instances it is taboo to discuss activities with others and considered rude for another to ask. This methodological and sampling challenge results in the under-representation of historic properties of spiritual and cultural significance to Indian tribes in resource inventories.

Twenty elders were contacted following an initial letter to all Bois Forte elders explaining that the Bois Forte THPO wanted to speak with anyone who was willing to share knowledge or information about the project area. Eighteen elders contacted the THPO and provided at least some information about the APE. Two elders who indicated they had information were not interviewed due to project time constraints.

During April and May, 2013 the Bois Forte Tribal Historic Preservation Office conducted interviews of Bois Forte Band members with knowledge of the project area. The actual interviews were carried out by one of the authors, Marybelle Isham, a Band elder, who has worked on similar projects (Latady and Isham 2011, 2012). Interviews were conducted at individuals' homes and recorded when allowed. Six open-ended questions were asked during the course of the interview:

1. Do you know of trails or routes that passed through the area?
2. Did you or anyone in your family use the area for collecting medicinal plants?
3. Can you tell me anything about places used for fishing, sugar bush, gathering bark, ricing or hunting?
4. What kinds of sacred areas have you heard about from the area?
 - How do you remember these ceremonies taking place or changing over time?
5. What stories do you remember about the area?
6. Do you recall traditional names of lakes, streams, outcrops, hills, important views?

In addition to interviews, the authors reviewed the archives at the Bois Forte Heritage Museum, the Gale Family Library at the Minnesota Historical Society and Minnesota Discovery Center archives. Archival research centered on the Trygg Collection at the Heritage Museum and the Minnesota Historical Society and an assortment of legal and background papers related to William Trygg's work as an appraiser for the Indian Claims Commission. Included are tree tallies, land sale information, abstracts from U.S. Land Surveyors' field notes, printed reports, court exhibits and names of native and local informants.

Interviews

American Indians have resided in northeastern Minnesota for time out of mind. Archaeological investigations indicate people arrived in the vanguard of retreating glacier's more than 10,000 years ago. The earliest inhabitants hunted large game and left behind evidence of their lives in the form of beautifully crafted spear points and other stone tools.

The most recent Bands to reside in the project area are the Anishinabe (Ojibwe or Chippewa). The ancestor's of modern Anishinabe living in northeastern Minnesota originated on the east coast and migrated to the area before the United States became a nation. The journey to Minnesota began when the Anishinabe followed the vision received by an elder in a dream warning him to leave the homeland on the east coast (probably at or near the mouth of the St Lawrence River) and journey west to find "the food that grows on water" or manoomin (wild rice). The first historical reference to the Anishinabe in the area appears in the journal of a French Explorer, Pierre de la Verendrye, in which he mentions an encampment of Saultier (French term for Ojibwe encountered at Sault St. Marie) on the Vermilion River in 1731 (Lamppa 1996, Richner 2002).

French Fur Traders referred to the Ojibwe in Northeastern Minnesota as Bois Forte or "strong wood" a reference to the thick, almost impenetrable, forests covering much of the area where these people lived (Richner 2002). An Ojibwe village was probably established at Vermilion Lake around 1800 and by the middle of the century there were hundreds of families in the vicinity who traded almost exclusively with the British Hudson Bay Company (Lamppa, 1996).

Wild Rice was abundant in the shallow bays of Lake Vermilion and along the Pike River and its tributaries—including Twin Lakes. The LaPointe Treaty of 1854 referred to the residents of the area as the "Bois Forte of Vermilion Lake" and granted rights to the lake in addition to yearly annuities in trade goods and provisions, but ceded more than five million acres to the United States including the project area. In 1865 gold was discovered at Vermilion and fears of confrontation between Band members and prospectors lead to the Bois Forte Treaty of 1866. This treaty terminated Band rights to Lake Vermilion and ceded another two million acres to the United States in return for annuities and a 103,000 acre reservation at Nett Lake.

Gold prospectors had left the area by 1868 because there was little of the precious metal to be found and Band members returned to the Lake Vermilion and once again roamed the surrounding forests, streams, rivers and lakes. The Band members living at Lake Vermilion held no legal title to the land, but most refused to leave the lake and move to the Nett Lake Reservation. In 1881 President Chester Arthur signed an Executive Order establishing the Vermilion Lake Reservation which became a gathering place for small bands of Ojibwe living across northern Minnesota.

After 1900, following traditional ways of life became increasingly difficult for Band members; traveling was restricted as land became privately owned. Logging reduced the forests to pitiful remnants and areas formerly used for berry picking, hunting fishing and ricing became

homesteads and lake homes. Limited mobility infringed on basic subsistence practices, which eventually resulted in families leaving the area and scattering to other communities. Some families moved to Nett Lake while others moved to other reservations including across the border into Canada. Many moved to cities and towns and a very few lived comfortably after finding wage work (Lamppa 1996). Those who remained often followed a seasonal round in order to survive; whenever possible gathering wild rice in the fall, berry picking in the summer and sugaring in early spring on and off the reservation. In spite of these and many other challenges, today there are more than 200 people living on the Vermilion Sector and 600 at Nett Lake.

The outline presented above is sketchy, in part because existing documentation on the history of the Bois Forte Band is not well organized and exists as scattered references or the occasional footnote in publications describing the history of Minnesota. The struggle for survival and connections to one another and other communities in the face of rapid change have been overlooked in texts and ignored by the dominant culture. Here we present some of the recollections of the past, the stories told by elders whose interviews and reflections appear below.

Priscilla Morrison

Priscilla spoke of her grandma King picking birch bark. She said she was too young to remember ceremonies and grave sites, but remembers her parents going to gather rice around Ely--how they spoke of portaging into the little lakes up there and where they would camp. "I remember when the mining started, 'cause a lot of guys from here went to work there on the range. The opinion I have, is that they should be very sure they are not destroying any historical sites, whether it be graves or mounds, and that includes any place in Minnesota I know I sound judgmental."

(Marybelle) "How do you see the changes taking place playing a role in the Bands future?"

"Oh I don't know, I think there's going to be more of the modern progress going on-and they are going to keep digging wherever they want to dig regardless of what the find. And there are so many people now a day's way more than there was back then."

Gene Goodsky

"I'm an elder here at Bois Forte, Nett Lake. I've lived here at Sugar Bush all my life. I've done a lot of ricing, but mostly on Nett Lake. We were teenagers in the early fifties-when we riced on Twin Lakes and Big Rice Lake. We would ride back and forth with the old man; his name was Ed Foster, who was a wild rice buyer and processor. We averaged two Bemis bags a day that was a good harvest. We'd go in to get to the lake at the Laurentian Divide. There was always a lot of the Tower people at these little lakes. Berry picking was mostly in the hilly area like the big mountain in Virginia¹, there were a lot of berries of every kind back in them days."

¹ Misabe Widjw

Justin Boness

“My name is Justin Boness, I’m from the Nett lake reservation, Bois Forte. I’m going to talk about ricing and the lakes in the Virginia area. I’m talking about Big Rice Lake, there used to be a lot of long-kernelled rice there. Now there is nothing on that lake, maybe a patch here and there on the shoreline. And I don’t see a future for that lake to ever produce rice again due to the mining I would say. The mining drain offs onto that lake, and all the little lake around there. Twin Lakes used to be full of rice. Twin Lakes north of Virginia, and there used to be other little lakes in there that had rice, but not anymore. I riced up on Vermilion River, that’s up by Crane Lake, them bays used to be full of rice the outer edges were thick with green rice. It was good ricing in the bays, now it’s green rice in the mouth of the bays. They rice too early there and the white people go and whack it all up so it never gets a chance to ripen up. Birch Lake too used to have rice but there isn’t much, its dwindling around Orr. There was rice in Mud Lake, some in Pelican. I guess that’s the only places I riced: Just west of Virginia and east of Virginia. There’s only weeds now where the rice should be. We would camp a few days when we rode with the rice buyer, Ed Foster, he would carry our boats too.”

Luanne Drift

“My name is Luanne Drift, wife of Justin. I started ricing with Justin about 30 years ago, when we riced in those lakes around Virginia they used to be full of rice, but not anymore. I have nothing else to say.”

Stanley Day

“I was born here in Nett Lake, I am 67 years old. We left the reservation when I was 15 years old. We lived in Sand Lake near Virginia for a few years. There were lakes there in that vicinity southwest of Sand Lake that had wild rice, we riced on these Lakes, especially one in particular, one that was hard to find, it was eight to nine miles from where we lived. This lake had real good rice. I need to find out the name of that lake. My father and mother who are both Bois Forte band members, they both spoke Ojibwe as their first language, for unknown reasons, they did not teach us. We riced a lot of lakes in that area, at Big Rice Lake which was north of that area and at Echo Trail and the Boundary Waters area. I can recall getting a lot of rice which was for our winter use for food. There was always berries we picked to put away. They were always plentiful.”

(Marybelle) “Were there plants that were gathered for medicine or spiritual use?”

“That would have been from a generation before me, but there weren’t many areas that wouldn’t have these sacred plants used for medicines and people that knew where to get what they needed.”

Ronald King

“My name is Ronald King, my father and mother were Luverne and Gwendolyn King. I lived in Nett Lake briefly as a small child, but basically grew up in Virginia, Minnesota. I remember when they would go ricing on Nett Lake. I personally have riced on Pike River near Biwabik, Big Rice Lake, another lake just out of Ely. I did a lot of hunting over by the Laurentian Divide by Big Rice Lake. Now I’m fifty-seven years old and no longer rice there. I don’t know if it was the way the crop was beat up so bad, but I haven’t went back, maybe fifteen years now. I still rice on the Vermilion River. There’s a site at the Laurentian Divide where there is a rock right next to the freeway where my father would put out tobacco whenever he made a trip whether it be a plane, road trip, train or whatever and I have had people who I loved and honored who went to this place to put tobacco.”

(Marybelle) “How do you see the area playing a role in the Band’s future?”

“I know a lot of Kings that were still workers, a lot of guys that have worked in the mines have gotten sick from the dust, mesothelioma, when I was young. I worked with Johnny Matson who is a logger; we went in to clear cut before the mining started. There was a lot of animals, deer, wolves, beaver, because no one could hunt there, so it created a place where the animals couldn’t be bothered. The animals left when the trees were cleared away, wet lands were gone, where the holes were made. The holes have water now, but they are too deep. The population has changed; land is gone where the homes were removed. Re-routing highway 53, which is a good possibility that it will take out Midway. The population there will have to move. It’s going to destroy the business in that area because people will by-pass those places, so it’s ruining the economy. I think it’s just a greed thing; the mining company needs more money. This affects hundreds of miles, when they set the dynamite off the wind catches the dust and goes many, many miles, it settles in the lakes that in turn destroys part of our rice crop. It’s not global warming, we get plenty of rain; it’s the mining company.”

Alma Lumbar

‘Hello-I’m Alma Lumbar, and I want to say a little bit of the ricing long ago. We riced at Twin Lakes, two little lakes and Big Rice Lake. We used to travel with Ed Foster; he would take people to go ricing carrying our canoes so he could buy our rice and we’d get enough rice, some to eat and some to sell, so we could buy groceries or things we needed. We would go out all day long, but we’d come back each day, he had a pick-up truck and a trailer to carry our boats. The amount of rice we got usually depended on the weather. We’d get back to his store about six or seven and we would parch rice maybe a little that evening or next day, whenever we could. Then we’d be back out there ricing again until it was too beaten up. Anyway, it was a lot of fun when the rice was good; people had rice.”

(Marybelle) “Do you remember any ceremonies taking place at that time?”

“No, just in the early morning, my grandpa would put tobacco in the water and say a prayer in Indian before we went out. That’s all I know.”

Rick Anderson

“My grandmother Mary was born in 1899 or 1900 on Burntside Lake, where she lived all of her life-died 1999. She would tell us how her family would travel to Big Lake every fall to hunt and gather wild rice in LaPond and Big Rice Lakes near Big Lake. My father and I continued this ricing tradition into the 1960’s, when we quit going by the early ‘70’s because the rice crop was so greatly diminished.”

“The last time I went into these lakes was about 20 years ago, just to check them out for rice and to look for some decoys that my grandfather and father had stashed on Big Rice lake in the early 1940’s before my dad went to serve in WWII-didn’t find them! There was literally no rice on either LaPond or Big Rice. Water levels were high, many beaver houses. I went back again about 15 years ago moose hunting; again, no rice on these lakes. There were once very productive rice lakes full of ducks, as far as I know; they were very unproductive for rice.”

Tim O’Leary

“I am Tim O’Leary. My native background goes back many years in this area. My father was Donald O’Leary, my mother was Sharon Poynter. Our family has picked wild rice since time began. Since mining has began here in this part of the world, our rice lakes have been becoming fewer and fewer, even since I have been a child. If this continues our generations in years to come may lose this great right and ability.”

“It is a great concern of mine that if higher standards of water stability isn’t met we will lose wild rice as well as drinking water. Without good water our land is worth nothing. Please take great concern and voice our safety and safety of our little ones.”

Eileen Villebrun Barney

“We riced Big Rice Lake near Virginia when I was about 18-19. We had to carry our canoes about a mile to the lake. There was so many people there. We didn’t get much rice, not enough to barely cover our expenses. Lots of people didn’t know how to rice and ruined it. We used to get about 30 cents a lb.”

“We riced other lakes in the area. Most of these lakes didn’t have much, maybe because they opened the lake too early and the rice was green.”

John Day

“When I riced with my mom, she would talk about ricing in the Boundary Waters. They would move all the way south down to the area near Virginia; Big Rice, Twin Lakes and all the local lakes-then towards Grand Rapids.”

Karen Drift

“The only thing I remember about when I was eight years old, I was taken along when my mom & dad riced on Big Rice Lake-Herbert and Emma Strong were there, we’d camp there so we would wait all day until they came in. They would sell their rice, someone would come by

with beer that they could buy, and they would get drunk. I didn't like it there. We would go to Twin Lakes too. I seen your sister Obbic there, they must have brought her along to cook she was cooking over an open fire."

Lester Drift

"My parents were Raymond and (Jessie) Margaret Drift. I remember going to them lakes with my mom and dad when they were ricing. More than that -when I went to college and learned about this area, what I learned that any lake that had wild rice in it was sacred to the American Indian. We camped at Twin Lake for maybe a week. I learned that the trail of the Mii-gi-zi goes through that arrowhead region. So there might be a trail. It would be a good idea to send someone to Washington, or the Haskell Institute to check out this area here to see if there is sacred ground that was there even before any of us were here. When I was younger and going to college I was on the tribal council, I wanted to go to Kansas to research treaties and land held in trust by the United States Government. And at one time I believe all the lakes had wild rice on them, we would move from lake to lake and set up a camp, until we found Nett Lake and because of the reservation we were put on, we stayed here-but during the winter like it is now, we moved away from Nett Lake. That big swamp that's around here, that swamp goes from Lost River down to Mallard Bay. That was once part of Nett Lake so we are actually sitting on an island and thousands of years ago that swamp was a lake. I learned that in biology when I was in college, so we are sitting on that missing island, but there are some sacred trails that the Indians followed to go from Twin Lakes up to Nett Lake up toward Deer Creek that way. There were a lot of sacred trails that were used by American Indians and each one of them had a camp up there, or they would camp along the way, so we had blueberry camps in the area, winter camps, ricing camps, all them kinds of camps. There would be ceremonies there."

(Marybelle) "What do you know about plants being gathered for medicinal use?"

"Yes, there were many plants all over this area, there were plants we would go to get around Tower, MN that was used for heart medicine long time ago. It was called Ca-ke-ga-bug. There's a lot of medicines around here that Karen knows about-she uses it yet for certain ailments. I think each one of these lakes there's certain medicines. Trees that were used for making medicine, so this is a sacred area-we believed back then. We didn't own the earth, the earth owned us, because we are never going to leave here. And that's why we never put a value on anything, gold, copper, iron ore-anything like that, few cares then. Now we are able to get to these lakes and drive back the same day. Financially, no one had much money back then either - technology would be another-aluminum boats making life easier.

(Marybelle) "Can you talk more about trails?"

"There was a trail between Orr and Pelican Lake. It comes out in the swamp back here; it was used to go to Orr or maybe to the camp at Gheen Hill-the Sioux and the Chippewa had a fight up there-there is a battle ground there. There's another battle ground out here from the Palmquist homestead site to the sawmill. My uncle John Strong said there was bodies laying all over out there. So, a lot of this area is sacred, because we traveled to wherever there was wild

rice and picked seasonal berries and medicinal plants. I used to say this when we had meetings with St. Louis County and Human Services, I bet all the big shots that are running the mining companies never once put out tobacco to thank mother earth. But we're paying for it now by being hard hit economically. Even the spring where we get spring water for drinking is sacred, because Karen puts out tobacco and says thank you whenever we take the water. That makes it a sacred place. All of the little lakes where we got wild rice is a sacred place to Native Americans. If we look close we would find trail all over or old roads where people hunted or went from place to place. So, I think no matter how many surveys are done and all the people say no, money is going to speak louder than our traditions, and they will go ahead and mine there anyway-so it doesn't make any difference, money will win out."

Sandy Walter

"In the area of the Laurentian Divide where my grandmother, my dad, Eugene Walter's mother would take us on, we would walk back in the woods I can't remember how far, she would catch water that was coming out of a pipe out of the rocks on the cliff face and we'd take some to the lake, and some to her house in Parkville and my grandfather, my dad's father, would take and walk to their cabin to their lake cabin in Parkville and he would walk through the woods, through where Minntac is now, and walked all the way to the cabin. He also walked from Parkville to the mines outside of Virginia to work almost every day. They hunted and fished most of the lakes around here including almost up to Rainy Lake. I never got to go ricing myself, but before my uncle Warner Wirta was enrolled, he was invited by the people of Bois Forte in Nett Lake to be a guest and go ricing on Nett Lake. My brother's got fortunate enough to take a week off of school-that's what the native kids got then-so he got to go ricing. I think he was probably about ten or twelve. That was quite an adventure for him, he really enjoyed that."

(Marybelle) "Can you tell me how you would ride on your horse over the hills before mining began?"

"When I was a kid off of old hwy 169, my dad had a junk yard before he passed and my Mom started buying horses for us kids. I used to ride my horse bare back, barefoot through the woods, on deer trails-through the woods, almost to Sandy Lake, where the quarry was out at Minntac, which is now under water. I got kicked out many times for riding in their tailings' pond. I used to go to Buhl, Kinny, Parkville, Eveleth area through the woods on my horse. But now that's impossible I believe, with all the mines around now. I would stop in a meadow and lie down and let my horse graze just enjoying a nice afternoon. Now those meadows no longer exist. Just the mines-maybe someone lived there years and years before to have cleared the land. There was wild carrots we ate those, thorn apples, lots and lots of huge strawberries, raspberries, black berries-pretty good size crab apples, a few regular apple trees, wild plums, we found a lot of things back there; also, a lot of bears and mink. Oh! I used to see a lot of red fox they were beautiful, the first time I saw a possum I thought it was the hugest rat I ever saw. It's probably the best thing my ma did for me-was to buy those horses, it was the best part of childhood."

(Marybelle) "Was there any other Native American families around there?"

“Yes, the Francis Jordains and the DeSotos lived there, the Neson family also; there was the Roy family too.”

(Marybelle) “Was there traditional ceremonies done there?”

“No, in the time I grew up if you were Native American you were pretty much nothing. We took a lot of garbage from other kids in school.”

(Marybelle) “You told me all your adventurous times were on your horse-the hills were your playground.”

“Yes, sometimes I would leave before it got light outside.”

(Marybelle) “Did your family make Indian home remedies from plants that grew in the area?”

“No, my mom, that’s where my Indian blood comes from, her mom died when she was eleven or so, she didn’t have a lot of time with her mom to learn anything.

(Marybelle) “Well thank you Sandy for the nice recollection of your childhood in a place where it is no more.”

“Yeah, when I drive through there now it makes me feel bad. I feel bad now.”

Bernard O’Leary

“As you know, my mom and dad, Susie and Tom O’Leary lived at Nett Lake most of their lives. My Dad hunted and fished this area for many years, and every fall they went ricing. They riced for anywhere from 3 to 4 and maybe even 5 weeks every year. They processed their rice by hand. No machining was done. They riced at all of the area lakes-Big Rice, Twin Lakes, and Vermilion River, sometimes they would camp at one of these lakes for up to 7 days. Dad had a pick-up truck with a home-made rack on the back for hauling the canoe and camping gear. These lakes close to home had some of the best rice beds almost every year. And the rice was real good to eat. They also riced on some lakes down by Aiken, Minnesota; Aiken Lake and Big Sandy Flowage, and even Mille Lacs Lake. This was a time when ricing was good all over this area from the late 40’s to middle 50’s. I understand now that it is all gone. No rice in big rice and a lot of lakes around here. Our whole family depended on having wild rice for food year round. We also picked a lot of wild berries. Sometimes my mother would can 80 or 90 quarts of blueberries and 20 quarts of strawberries; we also picked pin cherries and chokecherries. Back then, I remember, there was a great abundance of these things. We also hunted in Nett Lake, riced and picked a lot of berries. In the late fall, we had wild mallards with wild rice for supper, but now, with the wild rice going away, so are the ducks. My daughter and I still pick rice together, but there’s not much left.”

Jim Gawboy

“I am 77 years old, I will be talking about the Indians using the land around here. This is according to what my father and grandfather told me, so it may be a little mixed up. I’ll talk a little about the maple sugaring. Some of the Indians on the reservation used to go to Big Rice Lake to make maple sugar in the spring. Our side of the family the Gawboy’s used to go up the

Embarrass River to make maple sugar up there--I never went, I was too little--but I suppose that would be around Giant's Ridge. There's a lot of maple trees up there and people still go to make maple sugar, but when the trains came through, the passenger train came. I remember my mother and father would get on the passenger train, and go to the Mesabi location which is north of Hoyt Lakes, just a few miles, and get off there where there's a good stand of trees there. They would just camp there until it was done. They brought everything back as sugar, which was much easier to keep. So, that area just north of that is taken up by a mine, I don't even know the name of it. The mine keeps changing hands; it was Erie when I worked up there. Then during ricing all the lake around here were where they riced. Big Rice Lake, Sandy Lake, now Twin Lakes, I remember it was about 1946, my father, my older brother and I, camped right between the two lakes--other Indians were also camped there. My Grandfather, Anna Knott, Joe Knott, and three of their teen-age kids, they had a wigwam put up, with tar paper over, we just had a tent that we slept in. Then there was an Indian woman that was with a white guy. We stayed there almost two weeks, some days we didn't pick at all; we'd decide to let it rest. Some of the rice was processed right there. They would parch the rice and jig it out--remove the hulls. The Knotts had a threshing machine that was made out of a fifty-five gallon drum. They would take off the back wheel of their car and attach the drum to the differential --they could thresh a lot of rice and threshed a lot for us too! We didn't have a threshing machine until the following year when John Whiteman of Nett Lake made one for us--then we were able to go into some pretty heavy threshing. So we just camped there, rested, cooked and ate. We wouldn't go out each day until the rice got dry. Sometimes we didn't go out for a few days, the committee, or the people that camped there would come to the decision. They talked about where the camp was before, but it was generally in the same place, but I would guess they've gone in there so long that there were quite a few old camps right in the two peninsulas mostly on the eastern peninsula is where the camps were. But the eastern end of the little narrow inlet between the two lakes, according to their talk they had used the lakes and camps for many years."

"A lot of people think the Indians just stayed in one place for a long time but when I was young I remembered we were always moving. I talked about going one place for rice, one for maple sugar. Of course they knew where everything was; going one place to another according to the seasons. Just before ricing on the Vermilion Reservation you'd see people loading up to go. When they were asked where they were going they would say "to the lake"--they would be going to the Trout Lake area. When they came back they had big baskets of berries and I mean big baskets full. Then they would wait for the wild rice season to open. After that they would prepare for hunting and trapping season, and because that was done away from the reservation they would go to the north side of Vermilion. My father used to take a dog up there; we had one giant dog that could pull four deer on a toboggan all at one time. A big black dog named 'Pluto' guard of the underworld because he was so black. He also carried the supplies and bait for the traps, the dogs had to be taught to leave the bait on the traps alone. In the spring they went to a different part of the lake to net fish, but they were moving all the time. Then there was talk they were going up the Pike River to get some birch bark then they were gone for two days to get a

large sample of birch bark. Whenever they went anywhere they traveled light-most of the food they needed was gotten along the way. Even on the portages they planted potatoes that were planted in the spring-when they came back from blueberry picking the potatoes would be ready. They just moved all the time, as a matter of fact, one of the reasons Nett Lake was made a reservation was because they were camped there making rice when someone said, do you live here? Someone answered, sure I live here, so they made a circle and the person said okay that's where you live, that's your reservation. And the people in Tower were supposed to go to Nett Lake too, but they wouldn't go. They said we're going to stay here although a lot of them weren't from there. Historically, my parents were from the Rainy Lake area then some of the people there were from the Burnside area on the Tower reservation, everyone seemed to be moving. There were small Indian trails and big Indian trails that were worthy of being put on a map."

Edward Isham 5/31/13

"It was about the year of 1985 and again in 1987 I riced at Big Rice Lake. There was not a very large rice area. One bay had rice, but a couple little patches were already riced out. I never seen such poor ricing conditions. Other people, some with three in a boat, were all whacking away at the rice. It didn't take long to beat it all down. We went back in again, maybe, in the 90's - we went back there wasn't any rice there at all then."

Marybelle Connor Isham

When I started this survey, I knew it was going to be a difficult task to find information about the project area. The people who really knew are no longer here. So I targeted people born in the 1930's through 1950's. The main activity talked about was harvesting wild rice, each change in the season causes a flurry of excitement with the Ojibwe people, in preparation of berry picking, gathering medicinal plants, harvesting birch bark and wild rice, duck hunting, preparation of getting enough wood for winter use, not forgetting meat for the freezer and of course trapping. At one time I was a participant in the traveling, caravan style, with my mom and dad in a big old bus with boats tied to a trailer behind, I was in my late teens, already married, my husband Ed and I were considered to be seasoned ricers because we could keep right up with the best ricers and we were very competitive. This was in the late 1950's. The lakes where we harvested wild rice are those within the potential affected area of the Minntac mine, Twin Lakes also known as Big Sandy and Little Sandy Lakes, Big Rice Lake and Hay Lake had rice growing in them. They are also within lands ceded by the Bands in the Treaty of September 30, 1854 at La Pointe, Wisconsin.

In reading the "Trygg files," I learned some of the history and origins of our ancestors. What we see as terrible hardship was their way of life, which probably made them stronger and the way it is intended to be. The leaders made decisions with wisdom and generosity that affects us today. I hope we can be as brave and dignified when dealing with change as they were.

Results

The interviews indicate that through the early 1980's vestiges of the ancient Ojibwe settlement and subsistence pattern were pursued to the extent possible. Admittedly, patterns had been extensively disrupted by changes in landownership, poverty, reservation life and the lack of economic opportunity. However when feasible, Band members followed traditional behavior through hunting and gathering of seasonably available resources both on and off the reservation.

Reviewing the interviews in the context of resource availability, access and use, the interviewees provided information about the project area and utilization by Band members until almost 30 years ago, when resources critical to Band members were no longer available or accessible within the APE. Two Band members noted that trails were used for travel to specific locales for hunting, fishing and plant gathering. Lester Drift, mentioned trails several times during his interview, describing a specific trail, the "Mii-gi-zi that goes through that arrowhead region" and may be one of the trails depicted by Trygg (1966). He also noted there were a number of sacred trails that were used to access resources such as blueberries and rice, but also led to camps. More importantly, or probably more accurately, he notes ceremonies were also performed in conjunction with subsistence activities or camping. Jim Gawboy notes there were both large and small "Indian Trails" important enough to be put on a map. He is referring to the GLO maps which were used by Bill Trygg when compiling the information that appears on the composite maps published in 1966. Gawboy also indicates that traditional routes of travel such as waterways were abandoned, at least by his family, when going to and from the sugar bush. Extrapolation of this information suggests that some traditional means of access were used less frequently once other modes of transportation became available. By the time many of the elders interviewed during the course of this project were born, the traditional routes were used sparingly, if at all, which probably helps explain the lack of specifics on trail location and specific function (other than for travel).

Subsistence activities; hunting, fishing and plant gathering, were noted by everyone. Many recalled use of the project area by themselves and relatives. Specific activities such as making rice in the lakes north of Virginia, including Twin Lakes, were mentioned. Some spoke of gathering and hunting in the general area specifically noting maple sugar, berries, and birch bark. Most indicated that resources were obtained during day trips, but a few described camping overnight. Jim Gawboy was the only one who remarked upon staying at Twin Lakes while ricing with his family. He noted where the family and others camped and also explained that the ricers took time off from gathering the rice so that it could recover before the harvest resumed. Evidence of his family's camp (and those of other ricers) between the two lakes may still be extant despite high water levels that are probably due to the construction of a large tailings basin concurrent with building of the U.S Steel Minntac plant. Evidence of use of Twin Lakes by Band members in addition to specific reference to the locations where families camped indicates the Twin Lakes (Little Sandy Lake and Sandy Lake) meet the definition of a Traditional Cultural Property established by the National Park Service in Bulletin 38.

Other support for practicing usufructuary rights within the project area occurs in a particularly poignant account by Sandy Walter who spoke of her childhood and grandparent's residence in Parkville. She describes her grandfather walking through the woods where Minntac is now located. Her grandparents and parents hunted and fished most of the lakes around Virginia, but she was never able to join them due to her youth. She further relates how she used to ride her horse through the project area on deer trails and at times rode to Buhl, Kinny, Parkville and the Eveleth area. These excursions lead to being "kicked out many times" for riding in Minntac's tailings pond. The areas where she used to ride no longer exist as they have been replaced by the mines. The woods, animals, meadows, berries and fruit trees exist now only in her childhood memories.

The topic of ceremonies was addressed by three interviewees. The sacred nature of the land was acknowledged and described by Lester Drift and two others who described offering tobacco before undertaking an activity as substantive acknowledgement of the spiritual connection of the Ojibwe to this area. Gene Goodsky referred to picking berries on Misabi Widju

Not surprisingly, the subject of graves was mentioned in only the most general terms and by only one person, Priscilla Morrison. Burials are an extremely sensitive issue and specific information on grave locations would only be revealed if the informant was certain that the knowledge would not be exploited and/or lead to desecration of the graves. It is unclear if Ms. Morrison knows specific grave locations, but she is adamant that they should be avoided.

Discussion

The survey of Band members with knowledge of historic use of cultural resources within the APE of the proposed Minntac Mine Progression Project provided information about the area and how and where usufructuary rights were practiced. The THPO was fortunate to learn the names of a number of families with ties to the area. Undoubtedly, had we been able to interview elders a generation or two prior to this one there would have been considerably more information.

The interviewees identified a number of activities that occurred in the area ranging from subsistence to spiritual. Band members identified medicinal plant gathering, harvesting wild rice, hunting and fishing as having occurred within the APE by relatives other Band members, and often themselves. Sacred/spiritual activities were also identified and included offering tobacco to gathering medicinal plants. The single reference to graves did not include a location. However, graves are often proximal to settlements, including campsites.

The Twin Lakes (Sandy and Little Sandy Lakes) is a Traditional Cultural Property and eligible for inclusion in the National Register of Historic Places as it is a tangible property associated with events that have made a significant contribution to the broad patterns of US history – in this case reservation period life ways of the Bois Forte Band (criterion a). In addition, the Twin Lakes Site also has yielded or is likely to yield information important in history (criterion d). Numerous references by informants to harvesting wild rice at these lakes

until a generation ago indicate this was a primary area for the practice of cultural activities related to subsistence and spirituality. Manoomin (wild rice) is not only an important food, but also the center of Ojibwe life as it is the reason for the westward migration, which for Bois Forte culminated in their arrival in northeastern Minnesota. Manoomin appeared in the vision received by an elder on the east coast that initiated the Anishinabe migration to find the food that grows on water. Furthermore one informant described in detail the location of his family's camp when they harvested wild rice and an inventory of the lakeshore would undoubtedly reveal the location of this camp as well as others that may exist.

Due to the limited time frame for this project and the length of winter and concomitant snow cover within the project area, the Bois Forte THPO was unable to ground check the trail noted on the 1882 GLO plat of T59N, R18W and plotted on the (1966) Trygg composite map. Despite this lack of ground verification, the Bois Forte THPO suggests the trail corridor is significant and eligible to the NRHP under criterion a. To the Ojibwe, trails are deeply imbedded in their culture and by extension, the individual. The trail was used by Band members and also by early European settlers as evidenced by cabins plotted on the 1882 GLO plat map. Clearly field work is necessary to determine if the trail is discernible within the APE and constitutes a contributing segment.

One unanticipated outcome was the lack of specific information about areas in the western APE. Many interviewees mentioned Twin Lakes specifically. During discussions with the Corps of Engineers, before the project was initiated, the Bois Forte THPO and representatives from other Bands thought the Dark River and Dark Lake would have attracted Band members given these water bodies are tributaries of the Little Fork River—a well-documented travel corridor in the 18th and 19th centuries (and by extension used for many centuries before). Ms. Morrison describes her family hunting and fishing in an area extending from Parkville almost to Rainy Lake and one can infer that the Dark River and Dark Lake would have been included in that area.

Several individuals expressed concern and disappointment, indeed disgust, about the lack of rice in lakes where it was once abundant. Twin Lakes within the APE and Big Rice Lake six miles northeast on the old trail, but outside of the APE were cited as particular examples. The decline in rice was attributed to the actions of beaver and non-American Indians who did not know how to properly pick rice. At least one alluded to the mine's changing the landscape and thus impacting Band members ability to pursue their usufructuary rights within the ceded territory.

The loss of traditional life ways within the 1854 Ceded Territory is seen as not only affecting this generation, but also future generations. It is the responsibility of today's Band members to make decisions that will guarantee that seven generations in the future will have the means to not only survive, but prosper. The loss of rice waters affects all of us. However, the loss for the Ojibwe is considerably more significant, as manoomin provides physical and spiritual sustenance. Improper monitoring of the Minntac Western Progression Project will negatively affect not only water quality, but every living organism in the vicinity, including wild rice. The

loss of rice and everything connected with it will eventually result in the abrogation of treaty rights to hunt, fish and gather.

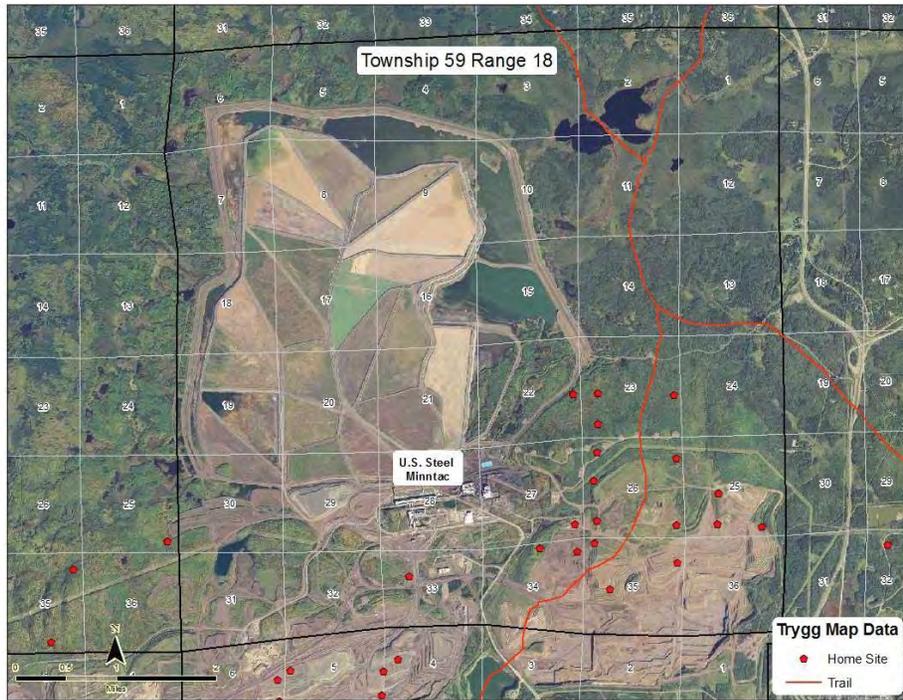


Figure 1. Illustration of the trails and homesteads (cabins) documented on Trygg (1966) Composite Map (Sheet 18) for T59N R18W and mapped on 2010 aerial photograph of Minntac Mine (Compiled by H. Fox).

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Identification of Historic Properties of
Traditional Religious and Cultural Significance to
The Bois Forte Band in the Minntac Extension Project
Area of Potential Effect

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Introduction

This report presents the results of a survey to identify historic properties of spiritual and cultural significance to the Bois Forte Band within the Minntac Extension Project Area of Potential Effect (APE). This document builds upon findings described in the Minntac Progression project report (Latady and Isham 2013) and results from plans by US Steel to expand operations at its Minntac facility located north of Mountain Iron in St Louis County (Figure1).

In an effort to help US Steel comply with federal regulations to identify and document historic properties of traditional religious and cultural significance to Tribes, the Bois Forte THPO proposed to document places visited by Band members. The proposal grew out of consultation between the Ojibwe Bands and the US Army Corps of Engineers. The survey was designed to document and evaluate historic properties of significance to the Band within the APE located near Mountain Iron in St Louis County, Minnesota. These properties include, but are not limited to, off-reservation treaty resources within the 1854 Ceded Territory, such as maple sugaring areas, wild rice waters, sites with spiritual significance, trails, village sites, fishing areas and other places where usufructuary rights are practiced.

Work began after the agreement created by the Bois Forte Tribal Historic Preservation Office (THPO) was approved by the Reservation Tribal Council and US Steel in May 2014. The survey was conducted through interviews of Bois Forte elders in May, June and July 2014.

Project Setting (Latady and Isham 2013)

The project area is located on the southern flank of the Mesabi Iron Range and the Laurentian Divide near Mountain Iron in St Louis County. The first surveyors employed by the US Government to survey the area where the Minntac Mine and APE are now located, described the Townships as well timbered with aspen, birch, pine, spruce and tamarack. The surveyor's notes go on to state that the land is rolling to broken with swamps between ridges, dense undergrowth and poor soils. The sole exception was T60N, R18W where much of the timber had been destroyed by fires that ravaged the area several years before the survey.

Wildlife typically found in this area includes black bear, white tail deer, ruffed grouse, small mammals and migratory birds including ducks and geese. Water bodies including Sandy Lake, the Dark River and Sand River contain a variety of fish including bluegill, crappie and northern and walleye pike. Many, if not all of the taxa, are economically significant to Bois Forte Band members, and in some instances have special spiritual import. Wild rice was once abundant in Big and Sandy Lakes.

American Indians have resided in northeastern Minnesota for time out of mind. Archaeological investigations indicate people arrived in the vanguard of retreating glacier's more than 10,000 years ago. The earliest inhabitants hunted large game and left behind evidence of their lives in the form of magnificently crafted spear points and other stone tools.

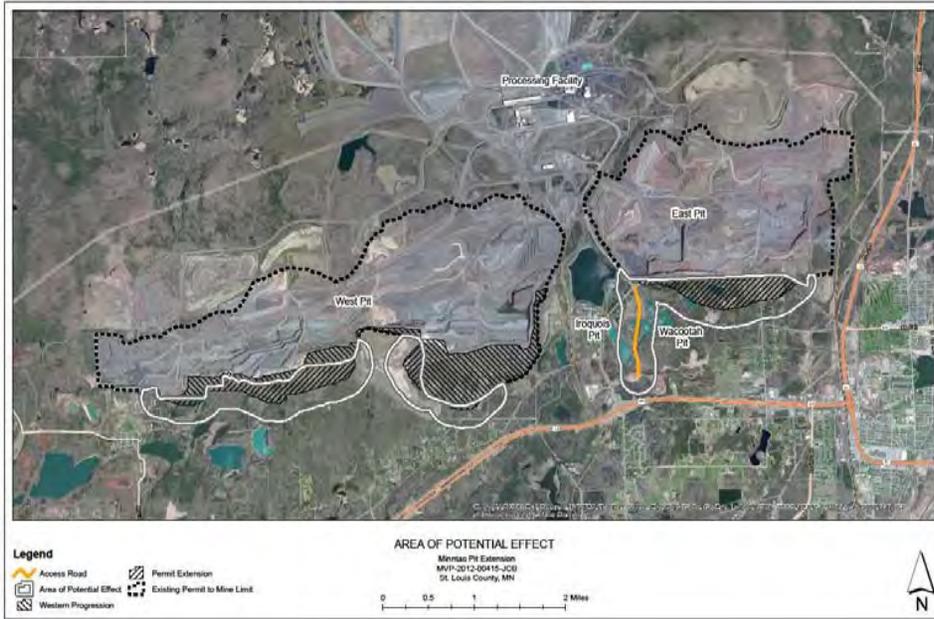


Figure 1. Location of project area.

The most recent Bands to reside in the project area are the Anishinabe (Ojibwe or Chippewa). The ancestor's of modern Anishinabe living in northeastern Minnesota originated on the east coast and migrated to the area before the United States became a nation. The journey to Minnesota began when the Anishinabe followed the vision received by an elder in a dream warning him to leave the homeland on the east coast (probably at or near the mouth of the St Lawrence River) and journey west to find "the food that grows on water" or manoomin (wild rice). The first historical reference to the Anishinabe in the area appears in the journal of a French Explorer, Pierre de la Verendrye, in which he mentions an encampment of Saultier (French term for Ojibwe encountered at Sault St. Marie) on the Vermilion River in 1731 (Lamppa 1996, Richner 2002).

French Fur Traders referred to the Ojibwe in Northeastern Minnesota as Bois Forte or "strong wood" a reference to the thick, almost impenetrable, forests covering much of the area where these people lived (Richner 2002). An Ojibwe village was probably established at Vermilion Lake around 1800 and by the middle of the century there were hundreds of families in the vicinity who traded almost exclusively with the British Hudson Bay Company (Lamppa, 1996).

Wild Rice was abundant in the shallow bays of Lake Vermilion and along the Pike River and its tributaries—including Twin Lakes. The LaPointe Treaty of 1854 referred to the residents of the area as the "Bois Forte of Vermilion Lake" and granted rights to the lake in addition to yearly annuities in trade goods and provisions, but ceded more than five million acres to the United States including the project area. In 1865 gold was discovered at Vermilion and fears of confrontation between Band members and prospectors lead to the Bois Forte Treaty of 1866. This treaty terminated Band rights to Lake Vermilion and ceded another two million acres to the United States in return for annuities and a 103,000 acre reservation at Nett Lake.

Gold prospectors had left the area by 1868 because there was little of the precious metal to be found and Band members returned to Lake Vermilion and once again roamed the surrounding forests, streams, rivers and lakes. The Band members living at Lake Vermilion held no legal title to the land, but most refused to leave the lake and move to the Nett Lake Reservation. In 1881 President Chester Arthur signed an Executive Order establishing the Vermilion Lake Reservation which became a gathering place for small bands of Ojibwe living across northern Minnesota.

After 1900, following traditional ways of life became increasingly difficult for Band members; traveling was restricted as land became privately owned. Logging reduced the forests to pitiful remnants and areas formerly used for berry picking, hunting fishing and ricing became homesteads and lake homes. Limited mobility infringed on basic subsistence practices, which eventually resulted in some families leaving the area and scattering to other communities. A number moved to Nett Lake and others moved to reservations, including across the border into Canada, where extended family resided. Many moved to cities and towns and a very few lived comfortably after finding wage work (Lamppa 1996). Those who remained often followed a seasonal round in order to survive; whenever possible gathering wild rice in the fall at area lakes

berry picking in the summer and sugaring in early spring on and off the reservation. In spite of these and many other challenges, today there are more than 200 people living on the Vermilion Sector and 600 at Nett Lake.

The outline presented above is sketchy, in part because existing documentation on the history of the Bois Forte Band is not well organized and exists as scattered references or the occasional footnote in publications describing the history of Minnesota. The struggle for survival and connections to one another and other communities in the face of rapid change have been overlooked in texts and ignored by the dominant culture. Here we present some of the recollections of the past, the stories told by elders whose interviews and reflections appear below.

Methods

Obtaining information on historic properties of religious and cultural significance to Indian tribes is complex. Sharing information on resources that comprise cultural identity with outsiders is carefully considered by tribal members because history has shown the information may be misused and exploited at the expense of the individual, tribe or resource. In some instances it is taboo to discuss activities with others and considered rude for another to ask. This methodological and sampling challenge results in the under-representation of historic properties of spiritual and cultural significance to Indian tribes in resource inventories.

Eighteen elders were contacted including two who were unable to contribute to the first Minntac traditional properties documentation survey, following a letter to all Bois Forte elders explaining that the Bois Forte THPO wanted to speak with anyone who was willing to share knowledge or information about the project area. Twelve elders contacted the THPO and provided at least some information about the area.

During May, June and July 2013 the Bois Forte Tribal Historic Preservation Office conducted interviews of Bois Forte Band members with knowledge of the project area. The interviews were conducted by Marybelle Isham, a Band elder and co-author of this report, who has worked on similar projects (Latady and Isham 2011, 2012, 2013). Interviews were conducted at individuals' homes and recorded when allowed. Six open-ended questions were asked during the course of the interview and contained in the letter requesting elder's participation:

1. Do you know of trails or routes that passed through the area?
2. Did you or anyone in your family use the area for collecting medicinal plants?
3. Can you tell me anything about places used for fishing, sugar bush, gathering bark, ricing or hunting?
4. What kinds of sacred areas have you heard about from the area?
 - How do you remember these ceremonies taking place or changing over time?
5. What stories do you remember about the area?
6. Do you recall traditional names of lakes, streams, outcrops, hills, important views?

Additional questions were sometimes asked in order to elucidate details or clarify points made by the interviewees, such as “did you or members of your family live in Parkview?”

In addition to interviews, the authors previously reviewed the archives at the Bois Forte Heritage Museum, the Gale Family Library at the Minnesota Historical Society and Minnesota Discovery Center (Latady and Isham 2013). Archival research centered on the Trygg Collection at the Heritage Museum and the Minnesota Historical Society and an assortment of legal and background papers related to William Trygg’s work as an appraiser for the Indian Claims Commission. Included are tree tallies, land sale information, abstracts from U.S. Land Surveyors’ field notes, printed reports, court exhibits and names of native and local informants.

In addition, avocational historians Todd Lindahl and Don Menuay of Two Harbors were consulted on July 25, 2014 regarding trails and other historic features in the project area. Both have spent years searching for historic features on the Iron Range and researching documents preserved in local historical societies. They have reported their findings to archaeologists from the Superior National Forest and the Minnesota Department of Natural Resources.

Interviews

Twelve elders were interviewed and their recollections appear below. Marybelle Isham, a coauthor of this and earlier reports, added her recollections.

Loren L. Connor

“I went ricing on Twin Lakes when I was very young, 11 or 12. I went with my step-father, Eugene Boshey Sr., Clyde Day, my uncle and Robert Ottertail. We drove there by car & boats. This was a good lake to rice on. We didn’t have very far to get to the rice bed. It was dark outside the morning we left. We did pretty good for the time we had on the lake. I’m sorry for not remembering the roads we took. All I know is that we were going to rice on Twin Lakes. All the other guys passed away now. This was about 51 or 52 years ago.”

Sandy Walter

“I lived outside of Mt. Iron which was Kimross, all five of us kids used to play and run in the woods right where Minntac is now. Minntac you know, is tearing up all that land up there and heading toward Sandy Lake and Sand Lake, I think now they’re just a few miles from Sandy Lake aren’t they, from Little Sandy? My cousin Rick Gibson said that Minntac now has eaten up a good portion outside of Buhl and around Kinney too, and Hibtac now is closing in coming close to Kinney so Minntac and Hibtac are getting pretty close together now. I hate seeing that, kinda makes me sad to think about that especially when I used to play in tree houses, ride horses, and hunt and play in the streams; can’t do that anymore. I stopped there last summer and checked out the streams that aren’t too far off the highway, the water in them is green, full of algae. They used to be clear and clean streams when I was a kid. They’re nasty now; they’re poisoned from the mine (Sorry for my tears). It always makes me feel bad when I talk about that. Sand Lake

north shore that's changing its gotten so loaded down with people that I don't know, too much construction, too much pollution, the last time I was up there the lake was full of weeds it didn't look safe to swim in, and that's still a little ways away from where Minntac is, I'm not sure what Sandy Lake looks like, I haven't been there for years."

(Marybelle) "I'd like to know about the area of expansion, which would be south and some time back the mine bought the little town of Parkville. What do you know about that?"

"They've been buying that up for a long time. My brother Victor told me the part that was absorbed by the mining company is chain linked off. They chain linked it off to stop people like me, Victor, and Janet. We were going in to rescue plants in old gardens, that's where I got my rhubarb from and rose bushes, lilies, iris, but now that is chain linked off, we can't go in there anymore."

(Marybelle) "Did you know of other Native American families that lived in Parkville?"

"There were Natives living there, but they weren't band members, there was Jordaines they were full blood, but not band members. They lived on the other side of Mt. Iron and DeSotos, I think they were half. They were not enrolled either. The Nelson kids, I don't think they were enrolled either. The Roy family lived right across from us. I think they had seven children. There are a few of these people still around, that I see once in awhile?"

(Marybelle) "Looking at this Trygg map, do you recognize any trails?"

She recalled the trail going through where the mine is now. "Parkville was such a nice little town my dad's parents lived there and that's where I grew up. And we lived across the street from them. It was a nice safe little town. Grandpa Wirta used to cook at the camps so he, a short talking person, didn't say much, he was all Finn. My grandma was all native. But everyone would come when he'd make a big meal, making bread and all. He'd call each one and just say 'come to supper tomorrow' real short. He added this huge room onto the main house, and had this huge long table about twenty some feet long, so everybody could sit down. He'd invite you over to eat chicken only to find out it was really rabbit. You probably know this, my grandmother had died when my Mom was eleven, but her husband was a game warden and he was a lot of the time at the Iron Rail where he worked also. I think parts of that homestead is still there, it's a marker. I have some of his paperwork (something I'd like to submit to the Heritage Center too) commendation from the state and everything as a game warden. Some of that paperwork are the original copies of the book that was written about John Linklatter and his dealings with the state as a game warden."

(Marybelle) "Was Warner a native from Bois Forte?"

"Yes, he and my mother were half. The Wirtanen farm from Wirta, my mother's father, is one of the historical sites the 'Wirtanen Farm.' He had his name shortened from Wirtanen to Wirta, so it's the family history in these parts, in Northern Minnesota lots. Grandpa Wirta came from the old country, from Finland. I think he said he was sixteen when he came here. He landed at Ellis Island. He started working in the camps and saved his money to buy his farm. He raised turkeys and chickens and later on a few cattle and grain. So Mom grew up, and Warner, in a hard

like and the kids, farm kids, very hard workers, tough people--not very lovable, but hard working.”

“Did you see the book that was written about the Linklatters?”

(Marybelle) “No, I didn’t.”

“I’ll bring the papers out and let you see some of that; pretty interesting reading, pretty much his history. There’s photos and there’s sketches drawn by Warner’s daughter for the book. It’s just incredible what she did. Warner and some man had written it. The book is just a small paperback not very thick. I have one copy here. I don’t know how many he had made and I have the original copies of the transcripts for the book. There could be a lot of information about his tracking around through northern Minnesota and he had something to do with Canada too. I’m not really sure. There’s a lot of information we didn’t get. What we got from Warner was what he wanted to feed out, what he wanted to write down. He talked and he took in a lot of things, but I think there’s a lot of things he forgot, he never got to share with the family. He was so busy digging history, that he lost history, you know, because he dug into this family background for probably close to fifty years. That’s a long time. He did interviews with people if people moved to another place, he went there and contacted them and got them documented, certified documentation. He did a lot of work, a lot of travel to get the information that’s in that book.”

(Marybelle) “There was probably more to Warner Wirta than most people will ever know.”

“Yeah, Warner was such a great part of my life, he was like a replacement after my Dad died you know. He and my Uncle Bob were the only good male figures we had. So when Uncle Bob went, soon after Dad, Warner and all the things he’s told us over the years, the places he’s gone, information about other people and how they belong to Bois Forte, or are related. But everything he brought up, was something I’d never heard yet. His head was so full of information I hope somewhere it’s in writing or recorded. Same time he’d be talking and say-oh here’s something I wanted to tell you kids, and it would be something I had never heard before.”

“The end for now.”

Gordon Adams, Jr.

“My name is Gordon Adams, Jr. I’ve lived all my life on the Nett Lake sector of the Bois Forte reservation. I have been married to my wife, Kathleen (Patsy) Adams for thirty some years now. I have three children, Rebecca age twenty-eight and Gordy age twenty four and Tyla age seventeen who is still in high school.”

“Today’s date is May 18, 2014 and we are at Marybelle Isham’s residence which is smack right in the middle of Nett Lake. When I was growing up in the early seventies, my mother was related to Mrs. Secola who resided in Parkville, Minnesota right next to the highway and right across the highway was the Minntac mine. At the time, being young, I never thought of any harmful effects or effects it would have on future developments or relating back to anything regarding the historical preservation act or anything in the Graves Native American Protection Act. What I know about the area is what I had learned from my mother, who was a very traditional Indian and which was related to Mrs. Secola and which they were both talking in the

Indian language and they truly enjoyed doing. Back then I remember those mine pits were off limits to just about anybody and everybody, but we used to go back there to explore, with Keith and his brothers when we were there to visit. And they would show us some of the deepest pits and ravines and a lot of places where the water collected. So that was quite limited, 'cause being a young boy didn't realize the full impact of what I was looking at or what impacts it would have on this generation and future generations."

"I'm looking at the map now of the proposed mine expansion it looks like it is really intruding on the Parkville area and some of the trails we used to walk and ride bikes on. I don't know the historical significance of those areas right now to me, but I do know that according to the Historical Preservation Act, that there should be someone doing test pits in these areas to find out what kind of historical significance are in the ground. By that I mean any clay pottery findings from the Clovis people, and fire pits, or anything of historical significance that would trigger the Historical Preservation Act to come into play and either limit, curtail or stop the pit extension proposed that is being forwarded to us. That would be my main opinion or request that something like that be done before this project continues."

"Many times over and through historical facts and history, the non-native people have infringed upon Native lands and native burial sites, significant historical sites, so on and so forth. This right here is no different. We, as an Indian people, need to find out where and what historical significance is, if any are located in this area. And the way to do this is to do some test digging with a shovel, two feet or three it doesn't need to be a giant hole. I think what they need to see is if there were any presence of Native Americans in that area, prior I believe, to the arrival of the Chippewa which would have been Sioux descendants. Prior to the Sioux descendants would have been far back. Five thousand years ago would have been the Clovis people who lived here long before the Sioux and long, long before the Ojibwe people. In which, we here in Nett Lake have presented evidence of Clovis culture that resided here even on the reservation and if they resided here, that tells me that they resided throughout Minnesota as well, and how the land looked prior to the excavation of these mines from the air. I'll tell you it would change your mind about mining and what the impact that those mines have done to the area there."

"I believe to me again, the Historical Preservation Act should have kicked in or was it bypassed, or maybe not even thought of back then. I think maybe it just came into law in the seventies or eighties. But again, it's my opinion because of my experiences dealing with historical preservation and NAGPRA laws and things of that nature. I do believe that before any expansion is done, they need to really thoroughly comply with the American Preservation Act and also the NAGPRA Act, especially if they find any human remains of our ancestors, or of the Sioux people, or of the Clovis people if they can preserve that far back. I think that should automatically trigger NAGPRA into action to say, look this has to stop until we find the historical significance of these remains, where they came from and who they belong to, if possible. I believe that should be part of this. I don't know if that has been done and completed, if there has been test sites that have checked out. I just don't know the status of that. But, again

I'm of the opinion that entire Minnesota was occupied either by the Clovis people or the Sioux people prior to our arriving at some point in time. As Chippewa people and when we came, we came from the North and so that would be my recommendation; that the test sites be done and completed. If there are any findings I believe that should trigger other mechanisms within those two laws to investigate."

(Marybelle) "Do you know of any fishing, trapping, etc. done in that area?"

"This whole area prior to mining, whatever year that was, maybe the 20's, was open to hunting and fishing, not only families that resided in that area, but in the advent of mining and the establishment of huge mining companies claiming their stakes to this property pretty much just brushed aside those Indian families, back then. I know that we didn't all live on a reservation way back then, we lived as families we lived according to the time of the year, whether it be spring camps, summer camps, fall or winter. At one point in time must have been occupied, especially the lake areas, that these lakes were used for fishing or whatever native people did back then. I'm of the opinion that there was significant movement, camp grounds, travel routes throughout this entire area, but when the mining companies came in none of this was taken into consideration they just started mining these big areas out and pretty much forced any Indian families out of the area."

"I do believe these areas do have some significant evidence that our people occupied that area for hunting and for fishing. Indian people back then were very connected with the Great Spirit in which these ceremonies were conducted. Again during all times of the year, the four seasons of the year in which also, if there were camps there that's where they would bury their relatives, or bury people that died in these camps, back then they didn't bury people six feet into the ground, because of the lack of shovels or digging instruments, they used anything they had; where it be animal bones or antlers of whatever. They had to get them into the ground, so the graves weren't very deep and to me, a bulldozer wouldn't have no problem just pushing these graves over and not even realizing what they were doing. Yes, these trails and campsites did have religious significance to them in addition to also burying family members all throughout these whole campground site areas again, whether, summer, spring, fall or winter. That's where they were buried and remembered. I'm of the opinion that there has to be un-marked sites and graves throughout the whole area."

"I think the Federal Government in its complexity and its enormity, it has to pay specific and particular attention to the NAGPRA laws and also to the Historical Preservation Act laws which prevent this kind of thing that's happening. They are encroaching upon our sacred sites our ceremonial sites, our ancestral lands, our hunting and fishing areas. It's a continual encroachment and expansion on those lands. Indian people need to stand up and make a stand. We need to defend those lands and those sites because of their historical significance. I believe the law should be carried out all the way around by everybody."

Bernard O'Leary

"My name is Bernard O'Leary. My parents were Thomas O'Leary and Susan. I am

seventy-three years old. I am a Bois Forte band member. I used to live at the old CC Camp, out there we did a lot of hunting. My parents were really good ricers and they riced a lot. I guess we want to talk about natural resources, so I'll say the ricing, hunting and fishing were all a big part of what my parents and even today, what I and my kids do to help make a living. I have three kids, they all like to hunt; fish, moose, grouse, venison, ducks, because we believe this meat is more healthy than what we buy in the super markets. So that's really important to all of us at Bois Forte."

"I guess I can say my parents participated in harvesting wild rice, they went to all the lakes, Big Rice Lake, Twin Lakes, Vermilion River, Nett Lake, East Lake, they'd go to Cut Foot Sioux, Four mile lake, up the North Shore, just about every place that wild rice grew. They would pick rice all fall and sometimes we had a thousand pounds, even eleven hundred pounds and that was all hand finished by my mom and dad. And I still hand finish all my wild rice to this day. It seems it's no longer easy to get a deer, or what we need to eat. There is a lot less wild rice in the lakes. Some of these lakes are depleted, Big Rice Lake. I don't know what happened to that lake, but there's hardly any there if any, at all. Twin Lakes, I guess there is none at all. Even the best lake I ever knew for ricing is Nett Lake, and I don't believe the rice is as good there as it used to be."

"But there is a lot of stuff that is changing our environment. You know a lot of lakes have been ruined by pollution, air pollution, lots of other stuff. A guy said to me once, the fish in Lake Superior were going away, there are not hardly any lake trout left and this was when I worked in Duluth. One guy said the Indians are netting all the fish. My reply to him was the little bit of fish that the Indians take is not the problem with Lake Superior, it's the lamprey, all the foreign species, and the pollution is what's killing off the fish. It's the same way here in Vermilion, the Indians net fish; I'm one that nets fish. We net fish here under the 1854 Authority, but the fishing in Lake Vermilion right now is down. I don't know if it is going to come back. I don't know, but I can say that cause I've been fishing in this lake since 1972. Our family vacationed here before moving here. The fishing isn't even 25% of what it was in 1974, so that kind of tells you what is happening to our lakes. We've got some sort of red crab in here, we've got some foreign weed, and I used to fish the Fish Lake a lot near Duluth, and that's got some spinney water flea, milfoil and a lot of other things that is ruining our natural way of life."

"We used to eat all the game and fish-now it's getting more scarcer & scarcer all the time. I don't know what can be done about that you know. I tell you, you go down to any big city, Chicago, Duluth any big city, that all built their industrial plants on shore lines, and they all had a pipe going into the lake. I worked at a wood products plant in Superior, Wisconsin and that's what they had. Eventually the plant was closed and we no longer were putting no more of our processed water into Superior Bay, but for quite a few years there they did."

"It seems that every time anybody wants to build something that's what they do. I went to a meeting at Fortune Bay it had something to do with the Polymet thing. They said they were going to put like 1500 gallons of water or more into some river every hour. Well you shouldn't have to do that. There should be some other way to handle that water. I'm not a pollution expert,

but every time someone wants to do something they should not have to stick a pipe into a river or a lake, but I guess that's enough said about that."

(Marybelle) "Is there anything you would like to put in about historical sites?"

"Just last year I went with the elder's on a pontoon trip over here to the new State Park, and over there they showed us an old camp site where they recovered some old artifacts, spear heads, arrowheads, some old deer bones. And there was another spot there in Stuntz Bay where there was another ancient camp site. There are some spots like that where I believe they shouldn't disturb. I used to live in the Fond du Lac neighborhood of Duluth. Up the road there on Hwy 210 it goes up to the Jay Cooke Park. There's a spot right next to the Jay Cook Park line where there's an old Indian cemetery. I don't know who is supposed to be taking care of it, but it isn't being cared for very well. I don't know if the city is responsible or who it is, but that's one spot, and there are other spots in Nett Lake, like Big Point should be checked and preserved. When I was a kid back in the late 40's maybe 1946, there was some people that came to Big Point. I don't know where they were from, but they were archaeologists and they were finding a lot of artifacts. I don't know if anybody has ever explored that any more. But that's one spot where there are graves, campsites."

(Marybelle) "Do you remember these places changing over time?"

"Well they've put roads into some of these places like at the State park where there is a park there now. When I talked to the ranger there, the guy in charge, he said they are going to keep those spots isolated. So I guess they will take care of it, but I guess everything is subject to development wherever there were places, Indian campsites, or grave sites were replaced by roads or highways or whatever, the area now is far from being as pristine as it was if you want to look at a place like the St Louis River down at the Fond du Lac neighborhood. I have read books about Indian settlements there; way back a hundred years which was the Fond du Lac people they say was one of the most pristine places. The fish were plentiful and the water was crystal clear, but take a look at it now and that's pretty much of what's happening all around the country. All of our resources which were natural to us to survive are all depleted bad with pollution and logging. Everybody knows how many white pine there was in this state of Minnesota, but there is lots of logging going on. You know the moose, I'm sure the logging has something to do with the moose population and the deer and forest fires. It all adds up that there is nowhere near the natural resources left here for the native people like there was, even fifty years ago. The fishing is bad; the hunting is not good. Now we can't hunt moose. Everything that's taking place, like getting rid of a bunch of land or eliminate some forest, you're taking away from our food supply that's what it amounts to.

Marybelle "I know your heart is in your words, I guess that's life.

" Yes, but I hope somehow they can turn it around."

Jennie Woodenfrog

(Marybelle) "Can you tell me how you got to Twin Lakes when you riced there?"

“I think they used to haul us around in Gerald Sheehey’s truck, they would haul us around, when there wasn’t much rice on our lake. They would carry our boats.”

(Marybelle) “Did you stay overnight?”

“Yeah, we camped on Twin Lakes for a few days with the Strongs; George Strong and his family. When Joanne Donald was a teenager she poled her grandpa around the lake, his name was Jim Boness. Her mother was Emma Bones who had two brothers, Frank & Charlie Boness. She lived with Herbert Strong. I was ricing with my mother, my brother William went along, also Billy & Mary Strong.”

(Marybelle) “Did you sell your rice?”

“No, we brought ours home, a lot of people made their rice out there-just enough to eat while they were there. A different party took us when we went to Big Rice Lake. There was a rice buyer there, so we sold our rice. There was a lot of people there, Roy Boness and his wife Sadie, that’s the only two times I went to outside lakes. The rest of the time I riced with my brother John on Nett Lake. My sister Mary and Billy riced in the Deer Lake area, one time-they used to go around with John Whiteman. A lot of people riced around in the Ely area. Someone mentioned Hay Lake that’s around Virginia too-that’s all I know, I hope I helped you.”

Kenneth Boney

“My name is Kenneth Boney. I’m from the Bois Forte Reservation. I was born and raised here. Right now I’m a spiritual leader & healer here at Bois Forte.”

(Marybelle) “Are you familiar with medicines from the area in question?”

“There is a plant picked in July called Weekaa that is used for many things, like arthritis, smudging, for healing, like a salve. Long ago, all of the sicknesses were treated by a healer, or medicine man. When we were ricing at Twin Lakes, Frank Boness found where Weekaa was growing, he said he was going to come back, since he seen where it was growing. There was enough there to last for a couple of years.”

(Marybelle) “Do you know if there were spiritual ceremonies done, during the gathering or medicine, or harvesting rice?”

“Yes, they have ceremonies first, to let the spirits know that they were going to go out down to the lake-or to get medicine.”

(Marybelle) “When you harvested rice in Twin Lakes was there a lot of rice that year?”

“Yes, there was quite a lot of rice on both sides and there was quite a few people there from Bois Forte.”

(Marybelle) “What do you attribute to the rice not being there anymore?”

“I think it’s the weather and all the other stuff like pollution even our lake is dying, and a lot of other lakes around here are dying from pollution, I attribute it to that, and there is nothing that can stop it. I’m concerned about that too, myself, you know. The old guys from long ago used to tell about this, they actually forecasted this, they knew that something was coming and that everything would be gradually poisoned, they knew about it. The water would be poisoned, they knew about it. That the water would be poisoned and that would be the end of the earth.

You know people can't live anymore if they can't have water. That's what they said long ago, they knew what was going to happen."

(Marybelle) Do you know about any particular trails?"

"There were trails all over. If a party of four got together to be gone for four or five days, they knew where they were going, whether it be North-south, east or west. They knew what they were going there for and what trail to travel on. They were guided by their spiritual dreams and were told what to look for as they went along, such as certain rocks or different things on the landscape. I remember this big old truck that had a canvas over the top, it could fit a lot of people back there, the truck belonged to Ed Foster he owned a store right off Hwy 53 he was also a rice buyer. He would drop his load of people off and make another trip to pick up more people. We would be left there for a couple days, and he would come back. He even had a processing plant to parch and thrash the rice in the back of his store. He'd hire three or four guys to work there. They knew what they were doing."

"This is the end of my story."

Marcella Drift

(Marybelle) Marcy was telling me that her grandpa built the first thresher for threshing wild rice ever used in Nett Lake-I responded saying, "Boy that sure saved a lot of work"

"Oh yeah, every day after ricing people would parch their rice at home then bring it to my grandpa. They would fan the rice (winnowing) (to remove the chaff) instead of taking money. He had a 83 lard bucket that he'd put into a bag and that's what we ate all winter and he's take the rice into Orr to barter at Lammis' or get hay with rice. All of us kids remember that. We were never hungry because my grandpa made sure we always had food and he'd even give some of the old people food to help them out. Grandpa had horses, two of them, he would cut wood and he told people to cut their wood and he would have it home for them. So he helped people. He was so generous, every Thanksgiving he'd put two long tables together and had all the old people come to eat. They had turkey, duck, deer meat, a lot of food to eat. Grandpa told us to 'never be lazy.' I asked him why our uncle was so poor, he said, because he is lazy. Grandpa even made a plow that the horses pulled, he'd plow the driveway, and he even filled barrels of water at the pump, so we didn't have to carry all the water such a long way. (Sigh) I retired not too long ago, but sometimes I wish I was still working because sometimes I don't have anything to do. I go for long walks. I walk downtown and if I stop for some groceries, I call dial-a ride."

(Marybelle) "Can you tell how you came to work for Minntac?"

I'm thankful for being hired. It all started when my cousin Benny said, Indian, you are always working. Why don't you go and put in an application where I work for the Minntac mining company. You would make more money, so I did. I later got a message that I was to attend some classes and later I was hired. I had a car, but after a while I worked with a lot of old guys that worked for US Steel in Duluth, but they had been laid off when they closed down in Duluth, so we all rode together in a van. I was the only lady in the van, but all the guys were so good and when I came up to Minntac all the people were good. I guess because I was a good worker or something. One electrician said yeah, everybody says how good you work. I said I had

a good teacher, my grandpa always told us, you gotta work, if you don't work you'll never have anything. Then I found out that was true, so I took care of my kids all by myself.”

“When I first started working, I started downstairs, hosing all the pellets into a conveyor belt where they were carried to the trains and loaded up. After I was done cleaning there, I was sent upstairs, and I would push the pellets down to the floor where I was before. In time, I was sent to the tap floor where all the balls were crushed and put into drums that went round and round all the stuff fell out and went down to the balling floor where the pellets were made. I worked there awhile. Then I went to the back where they cooked the pellets. After that I'd been to each floor, I went back to the balling floor. I was making the chemicals and stuff to make the pellets, that's where I stayed. I liked it there the best. One time they asked me to be labor foreman, I said no I don't want to 'cause I know what guys are lazy or who is not. They might get to hate me, if I told them what to do, stayed on the same floor all those years. I finally said, I'm going to retire as soon as I get old enough to because I've worked all my life, my kids are all grown up now I can just take it easy for a while. Now I'm kind of tired of being home. I'd like to take care of the yard, but the landlady does all that. I tell my kids to be thankful for the mines- they supported us through those hard years. Miigwech”

Delano Gonier

“I am seventy three years old, and I was born and raised on the Nett Lake reservation and I would like to speak a little about the mining companies. Mining the land on the iron Range in particular, talking about Big Rice Lake that is producing very little wild rice whereas fifteen, twenty years ago I believe that there was a lot of wild rice being produced on Big Rice Lake. Now there isn't much, if any, rice out there. A few sparse stands, I believe this is all due to the mining going on, on the Iron Range because of the seepage going into the water system and chemicals are being mined also and they're being washed also into the lakes around here on the Iron Range. No, on the Bois Forte Reservation there doesn't seem to be as much rice either and the size of the rice is much smaller. And I believe also, that somehow something is getting into that lake, maybe run off from farms, and possibly from the mines reaching up that far because, all water runs north from the Laurentian Divide so there may be some chemicals also. And Little Rice Lake also, is not producer of rice anymore, as are lots of lakes on the Iron Range from Babbitt to the Hibbing area, Nashwauk. So I think something has to be done. I don't think these mining companies United Taconite, Reserve Mining and those companies should have free access to mining. As I say, I've been wild ricing for a long, long time when the lakes were pure – so I think the mining has a lot to do with what is happening to the wild rice. I thank you.”

Phyllis Boshey

“I'm Phyllis Boshey, living at Lake Vermilion reservation and I'm originally from Nett Lake. My Dad was Albert Strong and my Mother, Mary Boness. They divorced, and I grew up with my grandmother and grandfather, aunties and uncles. I went to school in Nett Lake from kindergarten, eventually on to Orr High School. I went to work at Minntac for six and a half years, they shut down for a while. They called me in to do a physical exam so I thought I was

going to go back to work, but they never called me, so I called them. They said I was number 6 to be called back but instead of having 4,400 people they had 2,200 people so that's why I didn't make it, but I enjoyed working up there. I worked nine months inside the building and where it was dirty in there, every day I would clean it up and the next day come back, it would be dirty again, because the night crew didn't do anything, they didn't clean up, so we had to do their work on the day shift. But after nine months I was able to bid on different jobs. Anyway I was surprised to get the job I bid on, it was unloading rail cars and loading the pellets that were going out. So I did unload coal and unloaded bitrate that was used to make pellets. So I worked three different places and really enjoyed going outside. I smoked, and needed to go to my car to smoke, 'cause they wouldn't dare to have us smoke less than 20 feet from the building. So I'd go up to my car which was about 50 feet from the building. I'd start up my car, smoke there, and eat my lunch. So I finally got the job I wanted to be outside a little bit. I really enjoyed working there. They were saying the men wouldn't like us women working there, 'cause they already had some there, and hiring more women was against what they wanted, that the women would take over the taconite plant up there. We didn't do that, but, there was a lot of us women up there. I was there six and a half years. Then the plant shut down. There was four thousand four hundred working then at the time of the shut-down. When there was a call back there was only two thousand two hundred called back. I was number six from being called back to work. I was hoping I could retire from there, but my cousin Marcy got to retire from there. She was hired two to three years before I was so she had seniority. But I was able to draw up until five years ago. My money ran out from Minntac so I felt like I was living quite high for a while until money ran out. Now I just buy what I absolutely need."

"But anyway my husband Bob got two checks, so he was able to buy a new truck every two years. I was happy to get one of his trucks when he was done with it. I didn't have to pay for it (laugh). I was too cheap. I'm paying for his truck now 'cause Bob died just recently. I guess he forgot to make sure it was paid for through his insurance if something happened. But living away from the city, a person needs a reliable car."

"I riced with my mom and stepdad over in Twin Lakes and my uncle Calvin (Guam). We went everywhere with my mom and stepdad. There wasn't much rice there. If there was more than four canoes in there-we stayed only a couple hours, but the rice from there was real good and tasty. We riced in Big Rice Lake whenever there was rice there. I remember I was working at Minntac when I went to go ricing, they said where are you going? I said Big Rice Lake, oh maybe we'll try, we'll see you out there. I said yeah I'll be out there with my kids my partner was Rosemary (Glig's) wife. We had four canoes. Sure enough, them guys came pulling in to shore, two six packs, no rice in their canoes. I told them to look at the kid's rice. He asked her how old she was, she said twelve. He said twelve years old and you've got that much, I guess were not good pickers."

"I told them at work I was teaching my children to harvest wild rice, cause that was that age when I learned. That same year after we sold the rice, my dad made me help to buy school clothes and Sarah was just starting school that year, so grandma and I went shopping, we bought

winter boots-snow pants and a jacket. I felt so rich I even bought another jacket. My grandmother said, you give me sixty dollars and I will give you ten dollars every month-don't ask me for any more, make it last. So she was my banker. I got ten dollars on the first of every month."

(Marybelle) "Do you remember these places we've talked about, how have they changed over time?"

"Yes, my uncles, I can't remember what year it was-we were looking for rice, so we went to Twin Lakes. There was about four other boats in there, and we cleaned out that patch in two hours. We used to get three or four sacks, but not this time. So that was the last time we went there. My two uncles, Benny and Calvin and I riced with my brother Minge. Gerald Chicog and my ma and Jerry went out looking for rice; they didn't want to go to Twin Lakes. We had to walk from the road. We couldn't get a truck in there because of big ditches, big holes in the road I went as far as we could."

(Marybelle) "Did your grandparents live in the days that they would travel to harvest for winter use?"

We picked every kind of berry that was edible. Then my grandma would make jam. The only berry we could eat out there was June berries because of the big seeds in them, but she never let us eat pin cherries, choke cherries and cranberries. We used to pick cranberries in Nett Lake too I believe, Windigo's landing, high bush cranberries. Then of course blueberries so we could pretty much eat fruit all winter long. With all the kids picking, we had a lot."

(Marybelle) "Was there ceremonies done at harvest time?"

"Yeah, we had two sides, my grandpa, my mother's dad lived on one side and we lived on the other side. Then there was a big waginagon in the front and then we had old man Pego who lived over here, his name was Jim Boness. Then my grandma's house was here, and we had a round one there too, where they did ceremonies."

(Marybelle) "Do they do the ceremonies, giving thanks for the rice crop, the berries and all that was provided?"

"Yeah, anyway the ceremonies were, well almost like a church you know, that they wanted you to live good, they were the same way, especially if you went through Midewewin. The elder's would all talk to you when you sat in front of them you can't do this, you can't do that, you know, they would tell you what you could do. I went through once. Bob went through two times, cause both of his grandpa's were medicine men. I can't think of the first name of his other grandpa, Pete was the last name. They moved here from Burnside. The reason they moved here was Joe Boshey's wife died, so all the kids left there and moved here. Bob's grandpa Joe Boshey would go there to stay for the summer and guide over there. They had an island, but they never went back, once in a while they would go there to have ceremonies. After that old lady died, they just couldn't stay there anymore. So there is quite a few graves on that island, but they all made their homes here.

(Marybelle) "What are your thoughts about the mining that's going to be done, concerning our natural resources?"

“Well, they destroy a lot of land, when I worked up there I used to load the train, and I’d look around me, at what was being done” (The tape ran out).

Jim & Becky Gawboy

“I’m Jim Gawboy, I was born 78 years ago, Lake Vermilion Reservation. Last time I talked about the Twin Lakes area. I guess sometimes it’s called Big Sandy and Little Sandy. When I was a kid we picked wild rice there, and had wild rice camps north of Minntac. I don’t know too much of south of Minntac but as far as rice camps go, when a person died, wherever they were, they had to bury that person right there before the time of Indian reservations. I heard the old people talk of graves being in that area, but I was too young to remember or if they even knew where the graves were. But, the mining companies tend to do what they want. At one time I spoke with a guy, John Make, was his name. He said he had an aunt and sister buried in Britt. He said if you’ve got a business in Virginia you just don’t talk about what the mining companies do, but he did tell me about it. As far as the expansion goes it won’t affect the Indians up here because all the water is flowing south. The first Indians affected will be Fond du Lac reservation, the Saint Louis River goes through the Fond du Lac reservation, but except for the fact that was an important trade route all the way up the St. Louis River into the Embarrass River, right into the Pike River-right into Lake Vermilion.”

(Becky) “I’m Becky Gawboy. I was born and raised here. I’m 62. I have watched the mining companies swallow the land and poison the water. Even as I was a small child riding into Virginia, looking at the tailings ponds, we talked about there not being any birds or animals around there. My father talked about the land being poisoned and this was only what we could see from the road. And they could do what they wanted because they were rich. Now, I’m pretty sure that the US Steel or USX will say they’re going to do an archeological survey of this area. They did one on the new State Park and they told the State Park people that there was no findings. So the elder’s committee said you do more. This was after it became a State Park and there was thousands and thousands of artifacts there, and they discovered that Indian people had been living there for ten thousand years and that was the quarry for “chert” that had been found by archeologists for the last hundred years all over the country had been traded. That was a very rich resource and Minntac would have blasted a hole in it if it hadn’t become a state park. They don’t have any conscience about this land, they have no love for the land, they don’t honor it, people that get rich from that, they don’t live here, they live somewhere else. They will continue to do whatever they can do for more profit from this land. And they are not interested in what Indian people, or local people, or any people have to say about how they are poisoning the water and poisoning the land. Because their only interest is profit and that’s why it is so important to speak truth to power about this and to explain that these are sacred grounds, just like all the lands here are sacred land. These are gifts from the Creator and we have no right to poison it. We have no right to stand by and watch big corporations do the same thing. Where they are talking about expanding, they are not going to tell anybody about what the impact will be, because they don’t have to. That’s how they feel. They don’t have to because they are rich. And that has often been true over the years, but things are changing, people are listening, people are more concerned,

people are afraid because they know about the poisons. The people that are the fat takers the ones that take the best cut of everything, that take from the top of the pile from everything, that they are the ones that will take the earth away from our children's future. We need to stop and listen and take a look at this. The line has to be drawn now and it's very important for all of us to not be afraid of their lies. Because they will tell us that without them that we can't survive, but we know that is not true, because this land has all that we need as long as we take care of it. But as long as we continue to let it be poisoned, soon it won't be a fit place for anyone to live, just as all the fish, the birds, the animals, they leave when the mine companies come because it's poisoned, that's what we will have to do too"

(Jim) "The mining companies say they are there to provide jobs-they are not. They are there to make money! And if they can make money with fewer and fewer jobs, which is the history of the past, they will hire fewer and fewer people. So they will get by with as few people as they can."

(Becky) "And they bought off the unions, because they are saying, oh we need these people, we need them. But we don't need them; this land can support all of us in a good way, without them."

(Jim) When they used that river all the way to Lake Superior for transportation you could find good places to camp. If you were taking a canoe trip down there, you would find good places where the Indians would camp, just because it's a good place to camp. Just like the place at the state park, they wanted to build condos there when they found they couldn't because of there being too much ledge rock there. They chose that site for the condominiums because it was the most beautiful site, it was breezy, good access, and everything else. Well that is where they found all the artifacts and the chert Becky was talking about. That's the only place in the whole United States that it's found. It's a certain type of chert. They knew it was at Northern Minnesota some place, but they didn't know just where. They knew the further they got from Northern Minnesota, the less and less there was. In Wyoming at a village site, there was artifacts found there, or in Nebraska it was the same, but the closer you got to Minnesota, the more common it became archeological digs in Minnesota. The closer you got to Lake Vermilion the more there was because they not only mined it there, but they manufactured the little arrowheads there, then they took the little arrowheads out to trade, instead of taking big chunks of rock to other tribes, of course it was the finished product and there had to be a lot of craftsmen there to make these trade pieces that they traded out all over the whole United States."

(Becky) "What has happened is that the lies that the mining company have become the truth and the truth is buried. The lies are that this was all empty land, waiting for exploitation but, we all know that wasn't true. There was Indian people living all over Lake Vermilion, all along the river, in all of the good places, there was Indian people there. The fact that all those people were gone when the settlers came was simply the testament of the loss of life because of disease, the disease the French traders brought. Probably to 70-75 percent of the population was killed off because of those diseases, and there was few people left and many of those communities were gone. But it doesn't deny the fact that they existed and the history is still there

in the land and the resources that they used are still there for Indian people to use. The mining company comes in and claims the land for their own. It's land that was reserved by treaty for the Indian people to use, for hunting and gathering and things that they need to sustain themselves and it's a big lie that they don't have to follow those treaties. They are bound by those treaties, because they are not independent of the US Government, even though they try to be, they are part of this country and they have to follow those laws too."

(Marybelle) "Jim, do you know of any areas that were used for hunting, fishing and gathering or other activities in the time of going with your parents?"

(Jim) "I don't remember going south, although they did go south to Old Mesabi location to make maple sugar, that would be just south of where the Erie Mining company is now. They used to take a train there in the later days. I think earlier they probably walked there from Pike River. There is still evidence that they made maple sugar there, they also went to Big Rice Lake to make maple sugar our family only went to the Mesabi location once maple season came up, the people went to the traditional place where they have always went. Which is a little different then harvesting wild rice, wild rice is unpredictable, some years it is there, and others not-so. There is a mixture of people at the wild rice camp. Families go where the wild rice is growing. The area south of the plant I don't have much information."

(Becky) "Most of the land was logged off very early because there was all those lumber mills in Virginia early on at the turn of the century so there wasn't a stick of wood standing anywhere around the area. All the logs were cut off, so the land was spoiled initially the water wasn't, but the land was, so only along the river were there people traveling still."

(Jim) "I remember stories about the area called the "Thunderbird Trail" where the ridge goes. Well, it's probably on the bottom of the Minntac mine now, all the way up to Grand Portage, for the Thunderbird to travel back and forth. Indians still stop there on that rock just north of Virginia to put out tobacco on that place. Whenever we stop there we still see evidence that shows other people still stop there to put tobacco and small items on that rock, called The Laurentian Divide."

(Marybelle) "The maps show Indian trails going through where the mine is now and other trails from other directions coming in to that area, would you say that area was a point of Indian activity?"

(Becky) Yes, I think so, I think they recognized the sacredness of the Laurentian they recognized that was the route the Thunderbird took was there, because of the power of that spot, now they are digging holes in it on the other side."

(Jim) "When they would travel to Duluth or from here south, they would go to Fond du Lac because I have relatives there was because there was travel all the way down the St Louis River, a two day paddle to Cloquet really and that wasn't a long way to travel in those days."

(Becky) "And there was Indian communities in between there, just where the reservations are, that's not only where Indian people lived, they lived everywhere. The illusion is that Indian people only live in Nett Lake or Tower, Lake Vermilion or Fond du Lac, but the fact is this was all Indian land. They were always moving, harvesting with the changing of the seasons."

(Jim) “I remember looking at old copies or re-prints of Biwabik Times way back at the end of the 1800’s where they talked about Indians picking blueberries or going down to Embarrass to pick blueberries. Well when they went on these routes they didn’t just stick to these routes they didn’t just say we’re going to Fond du Lac. They would go upstream, maybe hunt and fish for a while, stop and visit at different family groups staying in places for harvesting. It could take weeks to reach their destinations.”

(Becky) “This was a time when people were connected. It’s connections that has been broken. All the things, the stuff that people collect around their houses now, the junk and the things they buy, are a distraction from their connection. Their connection to the mother earth is the important connection. It’s the only thing that puts us in a peaceful place. They understood their part, what humans play in the world. They were not on top of anything; they were part of it and respectful of it. Then the Europeans came and they had the value that they could take, that they could take whatever they were strong enough to get, the fat takers.”

(Jim) “They had gardens they never had permanent places to grow a garden, now when we have a garden, we think we are pretty close to the earth with our garden and our animals, but we’re getting further and further away from it, like we’re waiting to go and pack up our ATV tonight (chuckle). When we talk about the medicines that all the Indians used they say; they must have had someone that specialized in that. I’d say, well to a limited extent they did. But they knew what they had to do, so everybody knew what had to be used for certain illnesses. I can remember what size of tire my pick-up used but I don’t know, I know maybe two dozen medicine plants, and they knew hundreds, so that’s the difference and everybody knew, not just the specialists. They did that because that was their life. But it was a life they knew, this life we have now is imposed on us by the greedy ones. They did some studying and figured that they only had to work about twenty hours a week to survive, that was including women with babies, so it wasn’t nearly as hectic, life as it is now. So they had time to make beautiful things and sing beautiful songs and tell stories and those are the things that are missing now and the reason why we can’t stay connected to all of the relatives now.”

Ronald King

“My name is Ronald King. My father and mother were LaVern King and Gwendolyn King. I basically grew up in Virginia, Minnesota. When I was a small child, 2 or 3 years old, we lived in Nett Lake. I remember when I was young my mom and dad ricing all the time on Nett Lake, about the state lakes, maybe Big Rice lake, it was so long ago. Personally, I riced on Pike River in Biwabik, Big Rice Lake. Up in Ely there’s a lake a little ways out of town on the north side. I riced there. I did a lot of hunting by the Laurentian Divide by Big Rice Lake, very beautiful country, but they’ve logged a lot of that out right now. My friend rented a cabin near Big Rice Lake. He leased the land so we took a lot of deer out of there, and also a lot of rice. When I was about twenty, my sister and I riced there. I’m now fifty seven and no longer rice there. I don’t know if it was the way the people beat the rice stock, it was beaten so often I basically quit ricing there. I haven’t been back there for at least fifteen years. The only places I

harvest rice now is Vermilion River and Nett Lake. I have only riced these two areas for the past ten years. There's a site at the Laurentian Divide where there's a rock right next to the freeway. My family would go there whenever anyone went anywhere whether it be a road trip or by plane, train or whatever. I have had people that I loved and honored, a woman who I loved very dearly was my second wife. She was making a plane trip out of the country, she was going to Jamaica and was deathly fearful of flying. So I went to the rock put out tobacco and prayed that she would have a safe trip and she did. I remembered that from my childhood. Also in my childhood, every ricing time we'd go up to Nett Lake from Minneapolis my parents had a little trailer house behind Bronco Villebrun's house. We lived there a couple weeks, ricing and parching the rice. I remember the roads were not paved at that time, I remember the people that would stop just to visit. They would tell stories. Some had musical instruments, sing music, just enjoy the heck out of themselves. Now they don't do that anymore, just wave. I've been up into the boundary waters and I heard stories about (I can't remember what lake it was about). They had a trail that went up to a rock. I think the hill was called "brave hill" in order for a young man to become a brave they needed to run up this trail to the top of the hill. It was a very long hill and steep on a rock. I was young, I tried to run up that hill didn't make it more than half way. I tried several times and never made it to the top. So this was one of the stories how a young man made it to the top of the hill, to earn his manhood. I guess I'm not a brave, I never made it (chuckle). Just things and stories like that are what made life interesting. I think the story came from Roger and Donnie King, they were both a little bit older than I am. We were all up there together and the hieroglyphics I seen up there on the rocks and they used to tell me about the route the Indian people would take coming in, how they got in there and that was one of the places they would have to stop. This was years ago, those people are no longer around. I have just moved up here, about two and a half years ago, to Indian Point and I do a lot of visiting with just the locals around here. It reminds me of when my father lived here on Indian Point, everybody would gather on the road with their morning coffee, or whatever, and just talk and visit. I laugh because my two sisters who have their homes right beside me, they tell me I have turned into my dad, because it's what he used to do. People used to come to him for advice on their vehicles now people come and ask the same of me for help and it's a real good feeling, it really is. To look back what he used to do and what I'm doing. I'm filling his shoes, basically. There are so many things, when I was young we would drive up here from Minneapolis every Fourth of July. There wasn't many houses on Indian Point, just a few and there would be one huge gathering over at the beach area. Uncle Bronc would bring his boat and we could water ski and go swimming. There was a hundred people there easy, these were not all family, but people from Nett Lake too, all mingling together and once again there was beer, guitars and music. But those are the kind of days I miss. I have family gatherings with my own family now; sons, grandson, sisters, nieces and nephews. The only stories we can tell is stories we heard when we were children about my parents. They are lovely stories, but we need to carry on some traditional value and by telling these stories to our children and grandchildren. They ask me questions now, like what was grandpa and grandma like? What did you do when you were a child? Things have changed a lot

what we used to do, what we do now it seems a lot different. It's the same kinda, but it seems different to me, maybe cause those elderly people that were there are just not there anymore. I don't know it just seems so different to me. And I'm just trying to carry on a little bit of what I know and unfortunately I was never raised on the reservation. I lived in the white world where I got a lot of grief from children in high school, since the schooling programs I went through I had a lot of fights just being Indian and being called that. There was a lot of problems as I was growing up with it. My children, my sons, went through a little bit of that, but as they got older it got better, much easier to deal with. They had more programs that were covered in the school systems. They had Indian programs set up for them and they were also, as I remember when they were small we were able to get help with clothing and shoes through the Indian programs. So they didn't have to dress funny because we couldn't afford good clothes. And the special Ed programs too, it was a lot easier to get into them at that time. I can't remember what it's called, but I do know the program still exists. I have a hard time thinking of things, but I do know things have changed quite a bit. When we started getting casinos built, we went through a thing of, why do we deserve things like that? But it's not of deserving it; it's something we earned and pushed to get, a better way of life and to get away from depending on the State of Minnesota and the Government programs. Although we still have that, but we are more an independent person so things have changed. I can only hope that things continue to change, that it gets better and better as life goes on, so that our children can grow up to be better people themselves."

(Marybelle) "I'd like to ask what you think of what changes do you think mining has made in our lives; the lives of the Bois Forte people in regards to the wild rice?"

I know that Donnie King and most of the men in that family worked in the mines. Roger, Donald, Danny, Dale, they were all steel workers and worked a lot in the mining companies, constructing buildings and putting up other things. I can't remember why they quit, but a lot of other people who worked for years got sick from the dust – mesothelioma or whatever they call that. I think the dust itself is hurting the wild life. I know I worked with Johnny Mattson when I was a kid of about seventeen. As a logger I ran a skidder for him, we went in to some of the mining companies to clear cut a lot of the wood and there was. I seen a lot of wildlife, deer, wolves, beaver a lot the animals were in there, because nobody could hunt there. So it created an environment for the animals so they couldn't be bothered. But they took away a lot of wetlands that were there; they dug a lot of holes all through. The pits are still there with water in them, so deep, it's taken away some of the population for the people, a lot of the land is gone; even now they are planning on re-routing Highway 53. Which is a good possibility it's gonna take over Midway between Virginia and Eveleth. The population here will have to move and it's going to destroy businesses in that area. People will bypass those places, so it's ruining the economy. I think it's just more of a greed thing. We need more money; the mining companies want to make more money. I realize they can go only so far down, but to expand and destroy the land around, taking out the woodland and creating big holes."

Ronald Geshick

“My name is Ronald Geshick. I was born in Nett Lake in February 1942. I went into the service when I just turned nineteen. There’s a lot of things going on cultural wise with the Indians; pow-wows and ceremonies giving thanks for ricing, fishing and hunting. I came from a family of seven boys and three girls in which I was the youngest one, so I didn’t get much training in Indian ways and language. My parents didn’t teach me these ways, because they were intimidated into not doing any of those ways, but the ways were still going on, a lot of it was. I just wish I could have learned these things, the language I understand the language, I just don’t talk it very much, or very well. Growing up we had hunting and fishing; fishing on Nett Lake, hunting on Nett Lake because that’s the only world we knew was Nett Lake and it was a happy life that I had doing all these things as a young boy. Then when I went into the service I got to know the world a little bit better, a better understanding of it, but I still have my roots in Nett Lake and will always be there. Although I lived all over Minnesota, California, Chicago, I had, or I have this problem with alcohol, although I haven’t drank for over twenty years. So that kind of kept me down as far as learning about things, but right now I feel pretty good about myself that I was able to quit drinking and look at life more spiritual. My spiritual life now is pretty good, it’s growing. I think I’ve had it all along, but never used it until I sobered up again and it has helped me a lot.”

(Marybelle) “Could you tell me what you experienced as a youngster going to harvest wild rice on outside lakes?”

“When I was young, a teenager, we used to go out quite a ways. There’s a place called Twin Lake we went to and a place called Dora Lake it’s over by Leech Lake and we riced on Vermilion River and Big Rice Lake. There was a lot of people at these lakes we rode on a big truck filled with people. I believe it was Ed Foster or Matt Holmes.”

(Marybelle) “Did you camp there?”

“No, we came back the same day, but there was some people that would stay for days or weeks, ricing or picking blueberries.”

(Marybelle) “Did you know, or hear of the Laurentian Divide being a spiritual place to the Indians, then and now?”

“They had full ceremonies up on that ridge many years ago. I think they knew that it was a dividing line, so that made it a sacred place where they would have ceremonies there at certain times of the year. I’m sure as I think more on this, I’ll probably think of a lot more things. There used to be rice on Sand Lake here too! As I look at this map of the Minntac mine, I remember a friend of mine told me there was a little lake called Knuckey Lake and it was plumb full of rice. That was about four years ago. Moose Lake had rice on it too.”

Marybelle Isham

“My recollection of harvesting wild rice on state lakes, outside of our reservation brings memories of my mom and dad, my husband, who have gone before me. Our preparation of packing lunches, making sure we had sunglasses which was very important for the protection of the eyes, because once the rice kernel hits the eyes, the whole kernel may stay in the eye, or just

the tail part which we call a “beard” which has ridges which are sharp and helps to move the beard in deeper, almost like it crawls, much like the porcupine quill. Another necessity is to wear good gloves, as the tools of harvest are rough wood, knocking sticks, used to flail the rice off of the rice stock into the boat, the push pole used in the back of the canoe to propel the canoe and steer or manipulate the canoe through the rice, and of course the paddles. Our destination was decided by rumors of amounts of wild rice on different lakes, or news reports, sometimes someone was sent ahead to check out the lakes, lakes that I remember, Mud Lake, Big Rice Lake, Twin Lakes, Moose Lake, Vermilion River. Dad was chosen to harvest a couple times on East Lake near McGregor MN. That’s how they handled that lake, almost like a lottery. I am a member of the Conservation Committee on our reservation; we observe the wild rice closely up to harvest time. Worms are a problem, we hope for the black birds to come back to help with the problem, the worms eat a lot of rice-we have noticed the rice kernel is somewhat smaller. I hope the great-great grandchildren will not be deprived of this wonderful cultural seed that is a part of who we are as Native Americans. Miigwech”

Results

Four of the 12 people interviewed during the course of the Minntac Extension project, Jim Gawboy, Ronald King, Bernard O’Leary and Sandy Walter, were consulted for the Minntac Progression project in 2013. As documented in the earlier project, the latest interviews confirm that through the early 1980’s, vestiges of the ancient Ojibwe settlement and subsistence pattern were pursued to the extent possible (Latady and Isham 2013). These interviews once again confirm that traces of the ancient lifeways remain imbedded in the Ojibwe worldview as respondents speak of ricing on the Vermilion River and when possible, State lakes, such as Twin Lakes a.k.a. Sandy and Little Sandy Lakes, in addition to Nett Lake.

Not surprisingly, interviewees again indicated that the area around the Minntac Mine had been in general use up to 30-40 years ago when resources became unavailable ostensibly due to the effects of mining. In the case of towns like Parkville people were forced to move because of the encroachment of the mine.

Subsistence activities such as ricing, maple sugaring or berry picking were noted by almost all of the interviewees. Those who did not speak of one or more of these actions alluded to them. Ricing was noted the most often followed by sugaring and berry picking. People riced as families or with family members, sometimes camping with other families and at other times making day trips to the lake(s). Often ricers were transported to the lakes, including Twin Lakes, by rice buyers; individuals who purchased rice from the harvesters and had a vested interest in making certain that transportation to and from rice lakes was available.

Phyllis Boshey spoke eloquently about berry picking stating: “We picked every kind of berry that was edible. Then my grandma would make jam. The only berry we could eat out there was June berries because of the big seeds in them, but she never let us eat pin cherries, choke cherries and cranberries. We used to pick cranberries in Nett Lake too I believe, Windigo’s landing, high bush cranberries. Then of course blueberries so we could pretty much eat fruit all

winter long. With all the kids picking, we had a lot.” Berry picking was also mentioned by Jim and Becky Gawboy.

Maple sugaring was mentioned by Jim and Becky Gawboy, both locations they speak about are beyond the project boundaries, but it is noteworthy that people returned to the sugarbush where their families had sugared before. In contrast to ricing, where rice productivity is variable year to year and the harvest unpredictable which leads to a mixture of people at the rice camp and no one family returning annually to the same rice lake/river.

Other activities such as fishing and hunting were described. Deer hunting was mentioned specifically, by several interviewees as was fishing. One respondent, Bernard O’leary, laments the declining fish and game populations attributing the decline to pollution and introduced taxa. He also notes that wild game is important to his family explaining that wild game is healthier than meats purchased in a supermarket and emphasizing that usufructuary rights are important for his family’s welfare.

Trails were mentioned by three Band members. Sandy Walters recalls a trail that went through where the mine is now and Ken Boney states that there were “Trails all over” and individuals or groups using the trails were guided by spiritual dreams. Jim Gawboy recalls the Thunderbird Trail, a spiritual journey along the Laurentian Divide. He also notes that trails were transportation networks and not confined to walking trails, but included, indeed often depended upon rivers, such as the St Louis. Becky Gawboy, comments that trails, in particular rivers, connected numerous native villages. Prior to the fur trade and the introduction of European diseases, native communities were ubiquitous; unlike now when native communities are confined to reservations.

Concern about the loss of usufructuary rights was expressed by the interviewees. Several noted the disappearance of rice or diminishing productivity and actual size of the rice grains. Some attributed the depletion to mining while others thought pollution, introduced taxa and climate were culprits. All expressed concern about the loss of resources and worried about the consequences if this trend is not reversed.

Another concern was historic preservation, in part due to the importance of conserving physical links to the past, but also because of the possibility that the physical remains of native people might be disturbed. Gordon Adams, Jr. and Becky and Jim Gawboy made it clear that federal laws pertaining to historic preservation should be followed by Minntac including the National Historic Preservation Act (NHPA) and the Native American Graves and Repatriation Act (NAGPRA). The Gawboys mentioned the work done at the Vermilion State Park by archaeologists as did Bernard O’Leary. It is of vital importance to these interviewees that the State acted as a responsible steward by identifying and preserving these connections to the past. They clearly feel Minntac has a similar responsibility to follow the letter and the spirit of the antiquities laws and regulations.

Spirituality was touched upon by five interviewees. Becky and Jim Gawboy acknowledged the sacred nature of the land and this theme was reiterated by Ken Boney and Ronal King. Jim Gawboy and Ronald King described a rock where tobacco and other offerings

are made at the intersection of Hwy 53 and the Laurentian Divide. This area is only a mile north of Sandy and Little Sandy Lakes. Ron Geshick, notes that ceremonies were conducted on the Laurentian Divide and also remarked that ceremonies were performed giving thanks for success in ricing, hunting and fishing at Nett Lake. Phyllis Boshey echoed Ronald's statement about ceremonies in Nett Lake.

The importance of medicinal plants to Band members was noted by Becky and Jim Gawboy and Ken Boney. The Gawboys explained that they knew the uses of perhaps only two dozen medicinal plants in the not too distant past Band members probably knew the uses of hundreds of medicinal plants and spiritual advisors knew even more. Ken Boney described and named a plant, "Weekaa," that he said grew near the Twin Lakes (Sandy and Little Sandy) which another Band member planned to harvest.

The topic of graves was mentioned by three interviewees, but in general terms. Burials are an extremely sensitive issue and specific information on grave locations would only be revealed if the informant was certain that the knowledge would not be exploited and/or lead to desecration of the graves. Gordon Adams and Becky and Jim Gawboy noted the association of graves and historic campsites used by Band members and Mr. Adams stressed that internments were not very deep. The other mention of graves was by Bernard O'Leary and he referred to areas on the Bois Forte Reservation.

Two interviewees, Phyllis Boshey and Marcella Drift, had worked for Minntac and several others noted that they knew or had family members who had worked in the mines. When queried about their experiences, Mrs. Boshey said that she had hoped to retire from Minntac, but had not been recalled after a layoff. Mrs. Drift noted some of her duties as an employee, but also noted that she was thankful that the mines helped support her family.

The interviews revealed that there are few specifics known or recalled by the interviewees within the Minntac Extension Project APE. Sandy Walter and Gordon Adams mentioned Parkville and their association with that community, but did not describe specific areas where traditional activities occurred. Sandy Walter described a trail that has since been swallowed by the Minntac Mine and that Parkville has been slowly consumed by mining activity.

Discussion

Band members with knowledge of historic traditional practices or resource use in the general area of the Minntac Extension project provided information about when, how and where usufructuary rights were practiced. The authors were fortunate that interviews conducted during Minntac Progression project identified individuals and families with ties to the area who could be interviewed a second time about activities in the Extension project. Unfortunately little is recalled about activities of Band members within the Extension APE. This deficiency in detail is a characteristic in the interviews of the eight other interviewees. Were we able to interview

elders from a generation or two prior to this one, there would have been considerably more information.

However, these interviews added considerably to what was established during the Progression project, namely that usufructuary rights were practiced in the vicinity of the Minntac mine by Band members who lived both on and off the reservation. The four individuals, Jim Gawboy, Ronald King, Bernard O'Leary and Sandy Walter who were interviewed for both projects expanded upon their initial statements concerning the practice of usufructuary rights in to include their concerns about the effects of mine expansion and the loss of traditional resources.

Spiritual activities were another topic covered by interviewees. Band members identified medicinal plant gathering, offering tobacco and other ceremonies. Three interviewees, Jim Gawboy, Ronald Geshick and Ronald King touched upon the sacred nature of the Laurentian Divide; speaking of ceremonies and leaving tobacco along side of Hwy 53 where it crosses the Divide. Becky Gawboy noted that the land itself is sacred and is being harshly treated today. The references to graves did not include specific locations, but their proximity to settlements, even short term camps was noted.

The Twin Lakes (Sandy and Little Sandy Lakes) came up in a number of interviews. Descriptions of ricing, transportation to and from the lakes and even if the rice was retained or sold and whether pickers spent the day or camped further corroborates the historic importance of these lakes to the Bois Forte Band (Latady and Isham 2013:14-16). An inventory of the lakeshores would probably reveal the location of camps used historically and in antiquity.

As noted in previous reports (Latady and Isham 2011, 2012, 2013) the importance of wild rice to the Bois Forte Band and indeed the Ojibwe as a whole cannot be overstated. Indeed, Latady and Isham (2013) affirm that "Manoomin (wild rice) is not only an important food, but also the center of Ojibwe life as it is the reason for the westward migration, which for Bois Forte culminated in their arrival in northeastern Minnesota. Manoomin appeared in the vision received by an elder on the east coast that initiated the Anishinabe migration to find the food that grows on water." The drastic reduction of wild rice in areas where it was once abundant is a continual concern to all Ojibwe and in this area of particular distress to Bois Forte Band members.

Another topic noted by interviewees is transportation, historically via foot trails and waterways, and in modern times through the use of motor vehicles along roads. Trails were used to access locations of different resources, such as berries, rice, maple groves hunting and fishing areas as well as associated camps. According to Kenneth Boney, individuals also were guided in their use trails by spiritual dreams, a statement that is similar to one uttered by Lester Drift in the Minntac Progression project report (Latady and Isham 2013:9-10) in which he notes ceremonies were also performed in conjunction with subsistence activities or camping. Traditional travel routes were abandoned once other forms of transportation became available. In the last 60 years Band members often travelled to ricing areas by vehicles, but once there used traditional harvest methods to pick rice. By the time many of the elders alive today were born, traditional travel

corridors and routes were rarely used and probably accounts for the lack of detail on the locations of trails.

The loss of traditional life ways within the 1854 Ceded Territory is an ongoing concern and is expressed in many of the interviews. The decline in wild rice, but also game animals and fish was attributed to pollution, climate changes and invasive species. One interviewee noted that the mines used a lot of land implying these actions impacted Band members ability to pursue their usufructuary rights within the ceded territory. Concern about mine impacts to traditional ways was also voiced by three interviewees who indicated Minntac should to adhere to federal historic preservation laws.

The lack of information about traditional activities within the Minntac Extension APE is a little surprising given that several of the interviewees either grew up in the area or visited families who lived in towns within the project area. During discussions with the Corps of Engineers before this project was initiated, the authors thought that Band members who grew up in Parkville, a community within the APE would have accessed specific areas to rice, pick berries or other plants and possibly hunt and fish. However, few specifics were mentioned and the anticipated information on trails and access routes in addition to specific resource localities did not materialize.

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Identification of Historic Properties of
Traditional Religious and Cultural Significance to
The Bois Forte Band in UTAC Tailings Basin 3 Project
Area of Potential Effect

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Introduction

This report presents the results of a survey to identify historic properties of spiritual and cultural significance to the Bois Forte Band within the United Taconite (UTAC) Tailings Basin 3 Project Area of Potential Effect (APE). The survey was conducted by interviewing Bois Forte elders during the autumn of 2014 and results from plans by UTAC to expand its tailings Basin near Forbes, Minnesota, located south of Eveleth in St Louis County (Figure1).

In an effort to help UTAC comply with federal regulations to identify and document historic properties of traditional religious and cultural significance to Tribes, the Bois Forte Tribal Historic Preservation Office (THPO) proposed to document places visited by Band members. The proposal grew out of consultation between the Ojibwe Bands and the US Army Corps of Engineers. The survey was designed to document and evaluate historic properties of significance to the Band within the APE located near Forbes in St Louis County, Minnesota. These properties include, but are not limited to, off-reservation treaty resources within the 1854 Ceded Territory, such as maple sugaring areas, wild rice waters, sites with spiritual significance, trails, village sites, fishing areas and other places where usufructuary rights are practiced.

Work began after the agreement created by the Bois Forte THPO was approved by the Reservation Tribal Council and UTAC in early September, 2014. The survey was conducted through interviews of Bois Forte elders in the latter part of September, October and November 2014.

Project Setting

The project area is located near Forbes, Minnesota, south and east of the St Louis River in St Louis County. The first US Government survey of the area in which the United Taconite (UTAC) tailings basin is located occurred in 1875 by William Kindred. He described the Township as having uplands well suited to cultivation. Timber included pine, birch, ash, elm, aspen and tamarack. Kindred's notes go on to state that the lowlands are a "swamp," principally open with a few small trees 2-3 inches in diameter. Furthermore, the St Louis River was 8-10 feet deep with a rapid current and that the river, its branches and the lakes contained good clear water.

Wildlife typically found in this area includes black bear, white tail deer, ruffed grouse, small mammals and migratory birds including ducks and geese. Water bodies including Murphy Lake, the St Louis River and its tributaries contain a variety of fish including bluegill, small and largemouth bass, crappie and northern and walleye pike. Many, if not all of these taxa, are economically significant to Bois Forte Band members, and in some instances have special spiritual import. Wild rice is found in Perch Lake, Round Lake, Stone Lake, East Stone Lake, Anchor Lake and Elliot Lake. Historically, wild rice occurred along the entire length of the St Louis River (Jenks 1901).

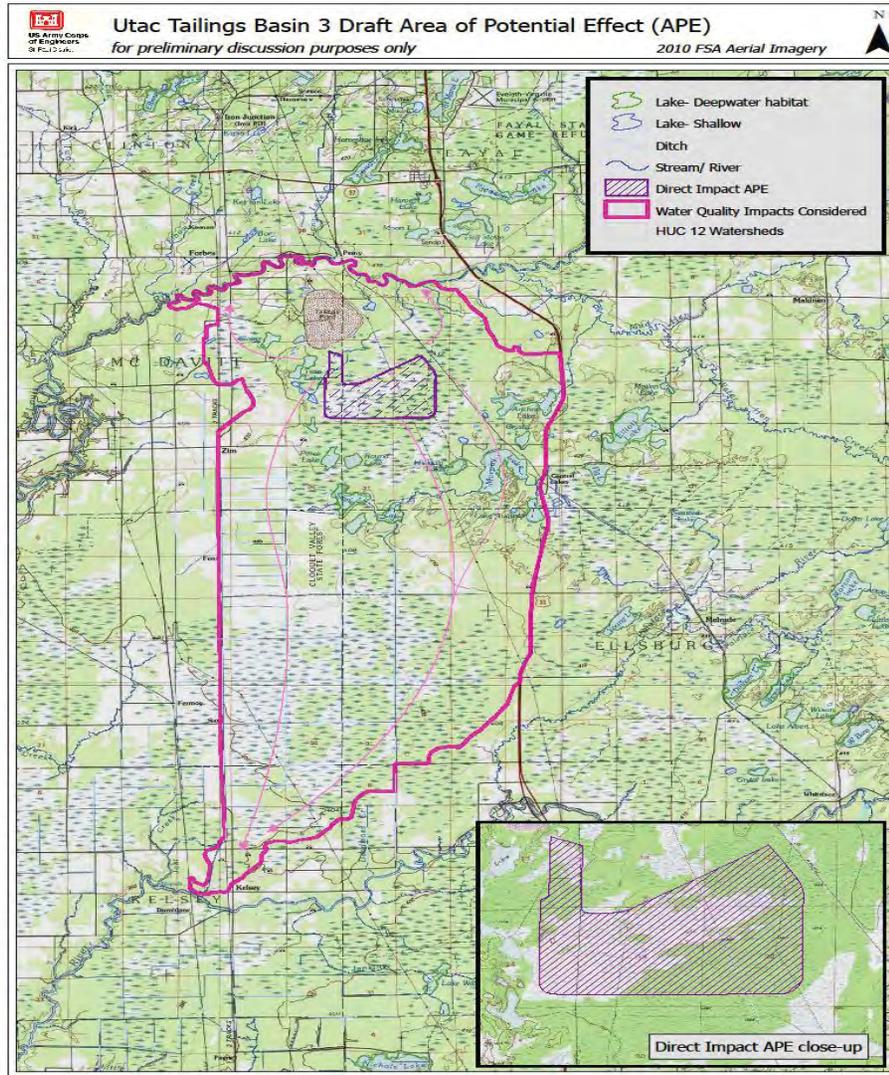


Figure 1. Location of Project area showing the Area of Potential Effect.

American Indians have resided in northeastern Minnesota for time immemorial. Archaeological investigations indicate people arrived in the vanguard of retreating glacier's more

than 10,000 years ago. The earliest inhabitants hunted large game and left behind evidence of their lives in the form of beautifully crafted spear points and other stone tools.

The most recent Bands to reside in the project area are the Anishinabe (Ojibwe or Chippewa). The ancestors of modern Anishinabe living in northeastern Minnesota originated on the east coast and migrated to the area before the United States became a nation (Warren 2009). The journey to Minnesota began when the Anishinabe followed the vision, received by an elder in a dream, warning him to leave the homeland on the east coast (probably at or near the mouth of the St Lawrence River) and journey west to find “the food that grows on water” or manoomin (wild rice). The first European reference to the Anishinabe in the area appears in the journal of a French Explorer, Pierre de la Verendrye, in which he mentions an encampment of Saultier (French term for Ojibwe encountered at Sault St. Marie) on the Vermilion River in 1731 (Lamppa 1996, Richner 2002).

French Fur Traders referred to the Ojibwe in Northeastern Minnesota as Bois Forte or “strong wood” a reference to the thick, almost impenetrable, forests covering much of the area where these people lived (Richner 2002). An Ojibwe village was probably established at Vermilion Lake around 1800 and by the middle of the century there were hundreds of families in the vicinity who traded almost exclusively with the British Hudson Bay Company (Lamppa, 1996).

Wild Rice was abundant in the shallow bays of Lake Vermilion and along the Pike River and its tributaries. The LaPointe Treaty of 1854 referred to the residents of the area as the “Bois Forte of Vermilion Lake” and granted rights to the lake in addition to yearly annuities in trade goods and provisions, but ceded more than five million acres to the United States including the project area. In 1865 gold was discovered at Vermilion and fears of confrontation between Band members and prospectors lead to the Bois Forte Treaty of 1866. This treaty terminated Band rights to Lake Vermilion and ceded another two million acres to the United States in return for annuities and a 103,000 acre reservation at Nett Lake.

Gold prospectors had left the area by 1868 because there was little of the precious metal to be found and Band members returned to once again reside at Lake Vermilion and roam the surrounding forests, streams, rivers and lakes. Band members living at Lake Vermilion held no legal title to the land, but refused to leave and move to the Nett Lake Reservation. In 1881 President Chester Arthur signed an Executive Order establishing the 1,600 acre Vermilion Lake Reservation which became a gathering place for small Bands of Ojibwe living across northern Minnesota.

After 1900, following traditional ways of life became increasingly difficult for Band members; traveling was restricted as land became privately owned. Logging reduced the forests to pitiful remnants and areas formerly used for berry picking, hunting fishing and ricing became homesteads and lake homes. Limited mobility infringed on basic subsistence practices which eventually resulted in families leaving the area and scattering to other communities. Some moved to Nett Lake while others traveled to other reservations including crossing the border into Canada. Many moved to cities and towns and a very few lived comfortably after finding wage

work (Lamppa 1996). Those who remained often followed a seasonal round in order to survive; whenever possible gathering wild rice in the fall, berry picking in the summer and sugaring in early spring on and off the reservation. In spite of these and many other challenges, today there are more than 200 people living on the Vermilion Sector and 600 at Nett Lake.

The outline presented above is sketchy, in part because existing documentation on the history of the Bois Forte Band is not well organized and exists as scattered references or the occasional footnote in publications describing the history of Minnesota. The struggle for survival and connections to one another and other communities in the face of rapid change have been overlooked in texts and ignored by the dominant culture. Here we present some of the recollections of the past though the stories told by elders in interviews. Their reflections appear below.

Methods

Obtaining information on historic properties of religious and cultural significance to Indian tribes is complex. Sharing information with outsiders on resources that comprise cultural identity is carefully considered by tribal members because history has shown the information may be misused and exploited at the expense of the individual, tribe or resource. In some instances it is taboo to discuss activities with others and offensive to ask. This methodological and sampling challenge results in the under-representation of historic properties of spiritual and cultural significance to Indian tribes in resource inventories.

Elders are highly respected individuals who are 55 years or older and the traditional repositories of knowledge. For millennia they have passed the Band's beliefs, customs and traditions to succeeding generations and continue to do so today. It is to them that we who are requesting knowledge turn to first.

Seven elders were contacted following a letter to all Bois Forte elders explaining that the Bois Forte Tribal Historic Preservation Office (THPO) wanted to speak with anyone who was willing to share knowledge or information about the project area.

During late September, October, November and early December the Bois Forte THPO conducted interviews of Bois Forte Band members willing to share their traditional knowledge. The interviews were conducted by Marybelle Isham, a Band elder and co-author of this report, who has worked on similar projects (Latady and Isham 2011, 2012, 2013). Interviews were conducted at individuals' homes and recorded when allowed. Six open-ended questions were asked during the course of the interview and contained in the letter requesting elder's participation:

1. Do you know of trails or routes that passed through the area?
2. Did you or anyone in your family use the area for collecting medicinal plants?
3. Can you tell me anything about places used for fishing, sugar bush, gathering bark, ricing or hunting?
4. What kinds of sacred areas have you heard about from the area?

- How do you remember these ceremonies taking place or changing over time?
- 5. What stories do you remember about the area?
- 6. Do you recall traditional names of lakes, streams, outcrops, hills, important views?

Additional questions were sometimes asked in order to elucidate details or clarify points made by the interviewees, such as “did you or members of your family live near the project area?”

In addition to interviews, the authors previously reviewed the archives at the Bois Forte Heritage Museum, the Gale Family Library at the Minnesota Historical Society and Minnesota Discovery Center (Latady and Isham 2013). Archival research centered on the Trygg Collection at the Heritage Museum and the Minnesota Historical Society and an assortment of legal and background papers related to William Trygg’s work as an appraiser for the Indian Claims Commission. Included are tree tallies, land sale information, abstracts from U.S. Land Surveyors’ field notes, printed reports, court exhibits and names of native and local informants.

In addition, avocational historians Todd Lindahl and Don Menuay of Two Harbors, Minnesota were consulted in October, 2014 regarding trails and other historic features in the project area. Both have spent years searching for historic features on the Iron Range and researching documents preserved in local historical societies. They have reported their findings to archaeologists from the Superior National Forest and the Minnesota Department of Natural Resources.

Interviews

Seven elders were interviewed and their recollections appear below. Marybelle Isham, a coauthor of this and earlier reports, included her thoughts.

Harold “Dayshun” Goodsky

“My name is Dayshun Goodsky. I am from Sugar Bush and my parents used to do a lot of ricing for Ed Foster, he paid them really good, he paid them by the pound and he knew what lakes had rice on them, because Steve Gheen used to fly his plane for him. And Steve Gheen could land his plane on a can, he was really a good pilot! My dad trapped for him all over this area. Twin Lakes always stands out in my mind. We used to go to them lakes back there, we had tents and we would get firewood while they were out ricing. Most of the area there, well it’s pretty hard to tell now, cause it’s all urban and them Twin Lakes are dried up completely, nothing! I guess Minntac is losing about a million gallons a day, according to a source that lives right back there and there’s about six people that have cancer back there. The road run right through those Twin Lakes and we camped right on the end of it. Iris smoked a pipe, made medicine and we all prayed the Great Spirit would take care of them. I went up there about two months ago just to see if them lakes were there--there was nothing there. Them lakes were all weeds and swamps, but I remember them. We used to go there all the time, they used to pay a good price for rice-even the kids who tried to rice, he even bought from them. But, there is on

distinct place besides Nett Lake, where we always riced, did you ever hear of doo-dash-di-dabon? It's a river, Vermilion River, that's it!"

(Marybelle) "What does the word mean?"

(Dayshun) "Means a fire train, there are old railroad ties running right into Pelican Lake. Before they flooded Pelican here you used to be able to go all over back there, it was a waterway. I did that one summer, we used to talk about the Indian people, the Lakota the Sioux. They had a place over by Littlefork River. My dad used to stay there. They used to sing in the evening for the rice and that. Oh gosh, the only lakes I can talk about is those two lakes, Twin Lakes, they used to be chock full of rice, there used to be a river in between them where you could knock rice even there without losing anything, and there was real-real good rice on them lakes. We would camp, all the kids would have to get the wood; we all had something to do. Twin Lakes always sticks in my mind because of how hard we had to work."

(Marybelle) "What can you tell me about the Laurentian Divide?"

"There was a grant given by the University of Minnesota because they wanted people to know more about the history of the Ojibway people. I don't think many of you people utilize that. We have to hire a different people to come in and speak. I went up there a few days speaking to them people, speaking about the lands and how the big bucks ran through there years ago (So as far back as you can remember they have changed a lot from what they used to be) Oh yes, I went up to Nett River the other day just to take a ride, cause I've been staying in the house so much."

Lillian (Ruby) Boshey

(Marybelle) "Ruby started her interview in our native Ojibwe, I had to tell her I'm sorry, but I couldn't understand, or wouldn't be able to write down what she was telling me."

"Hello! My name is Lillian Boshey, my clan is the lynx. My Mum was from here, Tower, Minnesota. Her name was Mary Ellen Labotte Jourdain. She was born on Jackfish Bay. My Dad is from Koochiching, First Nation, his name was Andrew Jourdain, Sr. and they had 13 children. My Dad always pretended he couldn't talk our Ojibwe language, so we would talk English then we would talk half and half 'cause my Mum didn't understand English, so we would say it half and half so the both could understand. Later we found out that my Dad was fluent, that he was just making that up, learning both languages at once. He was the one that really pushed us to school. Our cousins would be playing outside and had come up the hill and yell to us "Jordain kids, 8:00" and we'd all have to go in, even if we were seventeen years old, he'd sit at the table and watch us do our homework. Then if we said we already did it, and didn't, then we'd have two days of school work to do. He really pushed us hard and we benefitted from it. We have five social workers in my family, four teachers and two lawyers. He really pushed us. When me and my husband got married, or when I was just going with him, he had come from Lake Vermilion here cause his mama died and his Granma and Grandpa raised him here on this rez, and he used to come and visit his dad at Lac LaCroix, then that's how I met him. When we got married we moved to Lake Vermilion here. Then we used to go ricing at Big Rice Lake. That guy that owned

the land around the lake, he'd let us camp there. We'd stay there three or four days ricing, then we'd come back and parch the rice with his grandpa and grandma. But, I haven't been there for many years. It must be about twenty years ago when I went ricing. My cousin Isabelle Strong-gosh we had a tough time—we almost tipped over when we first got out. She was paddling and I was knocking, but we still made thirty dollars for that day, cause we were so busy laughing. The other Indians from Vermilion said we were like Che-mook (white) women cause we couldn't paddle or rice. When we got our kids we used to pick berries and then take them camping. Then this one time we went with Bobby and Phyllis and their girls. By the time we got on the other side of the portage it was really dark, we couldn't see and we had six kids with us. We had to shine the light for the guys so they'd know where to go, then we went to a little island, we set up camp. Mosquito's galore! The first thing they did was build a fire, so the kids could sit around the fire while we set up the tents. We'd have a little wiener roast and send them to bed. Next day we'd go fishing all day; we'd come back and cook the fish and stay one more day. On Sunday we'd get back so our husbands could go to work at Minntac. Quite a few times we did that!!

Then when we got our grandkids we started to teach them how to set net, how to pick blueberries and how to put your "asaima" (tobacco) down before you do anything, like ricing at Big Rice. We put "asaima" down in the water to give thanks for what we are going to get. My great grandson, he was only four, my Dad had passed away so we took my Mum out on the lake at Lac LaCroix, cause she was feeling bad, so we went blueberry picking and my Mum said make sure your grandson puts asaima down. I said he knows, so I gave him a pinch of tobacco, he went put it under a rock, he said this is for the makwa (bear), my doodem (totem). My Mum said "shaa" (expression for surprise or disgust) he's the one eating all our berries, so we can't pick them (laugh). All my grandkids know what to do—spiritually. Two of them live in Duluth. They call me all upset about things—I just tell them—you know what to do, grandma taught you what to do—ok, yeah, put out asaima by the tree—yeah that's what you do, the spirits understand you even if you don't talk Ojibwe. That's what they still do, they are young ladies now. Now my granddaughter who is eleven—I started teaching her how to bead when she was four and first used pony beads. By the time she was five, she was beading with my beads. They were here about a month ago. Her parents told me she made seventy dollars from her bead work. She called me, than they came to visit so she took more of my beads, thread and needles. She said she was going to have her other grandma teach her how to string the loom I bought for her. She wants to do loom work now. Then to pay her back I'm going to help her bead her mukluks here, she's only seven. She made a medallion for herself with a bear on it and she makes a lot of earrings and sold them. Now she's teaching the other little girls to bead. She said they are at the place I was when I started to use real beads. I told her not to supply the beads, let the parents buy their beads, because they are too expensive. But I really enjoy teaching my grandkids and the older three when they were young. I taught them to bead and make regalia. I'd tell them to come sit by me and watch what I'm doing. By the time you are fourteen, you're going to do it on your own, 'cause I'm not going to touch that sewing machine, or the needle. You are going to do it, unless you run into a problem. I'll advise you, but I'm not doing it 'cause grandma won't be making

anything for you anymore-you'll have to do it yourself. The seven year old said "but that won't be for seven more years grandma. Now I am teaching her the language. The other grandkids, my mum told me that's okay if they understand it, they don't have to talk it. So I followed what she told me. Now I'm sorry that I did. Now they can't teach their kids how to talk, they only understand and can't verbalize it. So that's my regret, cause I listened to my mummy, cause she said at least they'll know if someone is talking about them she said. I've been living here now since I got married. Only time I was out for nineteen years. I went to the university for four years then our deal was that I would have to come back to my Rez. to practice my teaching and help them out with teaching the kids, so I did that for fifteen years. Within that fifteen years I was taking summer courses and I got to earn a three degrees in education administrative, then I was teaching kindergarten and they told me that I have to get early childhood certificate cause my license was from grade one to grade eight, so I'd have to go back to school. So I went to Bemidji for three summers and I'm still short three credits to get my degree. I'm still going to try to get the credits through the internet, to get finished. I don't know why, but I just want to. I enjoy teaching; right now I'm enjoying reading native books, comparing our spirituality to what other tribes do. It's really interesting.

My great grandma, Nora Labotte Pete, was my mum's mom. I went to boarding school for seven years, every time we came home she would take us out on the lake and teach us the language, the medicines and the names of the animals, the birds and everything, cause we'd be out there with her all summer, until we had to go back to that boarding school. Then that's how I kept my language to keep it in my heart, not to let it go, or lose it, that's all. Miigwech (Thank you)"

Jim Gawboy

"This is Jim Gawboy. I have been asked if I can remember anything about the area where they are expanding this tailings basin. I don't know. I think maybe I've told everything I have in my head already, but I may as well. I'm not familiar with that area, but I did paddle that route from Murphy Lake to Stone Lake once back in, I'd say before 1965 and it was very hard to paddle as it was overgrown with brush. These routes that were used by Indians didn't have to be very wide three foot wide and a foot deep and a canoe could go through there, the only real problem we had was alder bush growing over each side of the creek, or river in the old days that was always cut clear so it was real usable. I suppose the reason I went in there was because it was my patrol area when I was working as a game warden for the State of Minnesota. It was a creek I had never been on. About half way through we were kind of regretting that decision, but we made it through. A lot of these small creeks were used as canoe routes and kept clear of this kind of brush. I suppose they would come up St Louis River to Anchor Lake and maybe portage into Murphy or maybe through Eliot Lake, cause there's a creek coming into Elliott Lake too that's probably usable. But the area they are going to use as a proposed tailings pond and proposed plant area is an already overburdened. But the place that's a tailings basin it looks by the map that it's all muskeg swamp which of course is sphagnum that holds water and lets out a

little at a time. So if everything was paved over, everything downstream would be flooded out the next day, but muskeg swamps hold all this water and other than being useful for cranberries and it's fairly close to the Saint Louis River and it drains north and almost every direction draining out too- into Round Lake. To be completely safe it would have to be waterproofed and I don't know how you'd make that area waterproofed cause I don't know how deep those muskegs go. Around Zim it would go twenty-thirty feet to the ground. I remember 20-30 years ago when they were putting a pipe line through that Zim Swamp. Just west of this map it might be right on the edge of the river. (Edge of this map) I remember when they were working on the pipeline, they parked a caterpillar-a bulldozer, on their work site. They came back the next day, it had disappeared. The muskeg gave way. It went down into the peat, they probed and couldn't find it. It's probably still down there. Those swamps are unlike nothing else in the whole United States. The swamps in Louisiana and Florida they all have solid bottoms, sandy bottoms. (Laugh) and these swamps here have muskeg that just goes down and down, the only way to keep the pipeline down, would be to weigh them down with concrete blocks as big as a house to keep them from popping up. It's really a unique area, a unique kind of swamp. There's probably other swamps like this in other parts of the world and Canada, but they're not as deep as around here. When the glacier left I think it filled in faster here than it did other places further north because of longer seasons. An ancient glacial lake that filled in a lot faster than the ones up north, so it would make the muskeg bogs much deeper. But I paddled the St Louis River all the way down too, on several occasions. I don't know how much leakage is going in there that wasn't going in there before, I don't have too much else to say around that area. I don't know of any old. My family never lived in that area, or moved through there. I've been through there a few times. I remember people talking about paddling the St Louis River going downstream on long trips. I suppose they were going down as far as Fond du Lac because I have relatives there too. My great grandparents had relatives there the last couple generations I don't even know. But I'm sure there were other people that used that area for a lot of things. Indians use a lot of medicines. Plants grow in bogs, there's swamp tea and other medicine plants besides cranberries. Of course they used spruce wood for a lot of things, but it wouldn't be too critical for spruce wood to disappear, other than that's about all I know of that area. My wife Becky has something to say."

Becky Gawboy

"The doubling of the tailings pond and the questions asked about the historic significance to Bois Forte, all of the land in the 1854 Treaty is historic and has religious significance. Any harm that is done to the land will hurt the people of Bois Forte because it is part of them. It's not just the complications of adding this to the tailings ponds is why this tailings pond is once again being expanded, it's because in other parts of the 1854 area, more land is being mined and more taconite is being taken out and if these tailings ponds weren't a risk or a danger, there wouldn't be a need for this study. If what they were putting back was harmless it could be put back anywhere but it isn't harmless, it is poisonous and does put all the rice lakes at risk. It puts the St Louis River at risk and it puts all the well water for all the people who live around there at risk,

and the question is, who profits from this? The people around there don't profit by this, the mining company, the multi-national. They're the ones who profit. This is all sacred land-every inch of it-because that's just the nature of the land-a lot of this land is still hunted and still riced by the people of Bois Forte and it will definitely make an impact on these people and the health of the rice. In fact, we just had rice from Stone Lake the other night because our boys riced there several years ago, they got three sacks. Stone Lake is a nice rice lake-good rice! Perch and Round Lakes are too"

(Marybelle) "I would like to know if Perch and Round Lake had any rice this year?"

The tailings pond will change the acidity of the waters, is anyone going to stop this because of those rice lakes? I don't know, I don't know what the process is, or if it matters you know, if anyone is going to do anything about this? Every time they move further into that swampland and take more land, which are full of plants and full of medicines that heal the people and the land, they diminish the resources left for Bois Forte people. That's all I have to say.

Lester Drift

"All the lakes that produce rice are sacred to us, we put medicine in the lake to keep it sacred, we do ceremonies around the lake to keep it sacred, we even had powwows in some areas because it is a sacred place to us. Any lake that has rice on it is food for the Native American and we treat it with high respect because it's fed us through the winter. There is probably a lot of individual ceremonies taking place. I do a ceremony every spring, every fall. I thank the Creator for giving us wild rice. I cook up some wild rice, I mix in some blueberries and maple sugar and talk to the Creator in the native language. We do the same thing at the sugar camp and the blueberry camp. We put tobacco down and talk to the ground area to tell it to bring back the blueberries next year and do the same at the maple sugar camp. We did a sacred ceremony at every place where we took or got something from that place, to sustain us in food or whatever it was for our winter use. Sugar we could keep, blueberries we could keep, wild rice we could keep. We are thankful for this food for our use. Up here in Nett Lake we still do the ceremonies, like myself, probably at every lake, at every Indian campground, wherever the Native American lived or moved there were sacred ceremonies. So to look at it realistically, the whole northern part of Minnesota is sacred to the American Indian, especially all the lakes that have wild rice. We know that as Native Americans we do not own the earth. The earth owns us, because we are only here for a short time. The earth is old, the universe is old. In the short time we are here we get to do sacred ceremonies. We are thankful for the part of the earth that gets into our systems through the blueberries, maple syrup and wild rice and all the plants that contain Indian medicine- and it grows all across the Iron Range and we know that there are plants out there, that there is a plant out there that can heal every sickness. We know as Native Americans that sooner or later we're going to run out of these medicines. Men and women know that it is fast disappearing, because nobody wants to believe that part of our life, but we know. I've tried as hard as I could. The sun, the moon, the wind, all the parts of the universe are sacred. They were here long before men were, but they are still a part of our life because if it wasn't for them I

don't think we would be here. I'll always be thankful for that, and anything that is taken from the earth, like minerals, a kind of gold, nickel, copper and all the kinds of mining that is going to go on, something should be put back, at least a little bit of tobacco. That's what we do; giving a little something back because if we don't do that, it will be taken away from us. Or if we abuse it, it will be taken away from us. Just like most of the lakes that had wild rice on them, they allow motor boats and everything else to go in them. Now there isn't any more rice on them lakes. That's a good example of when you abuse something, Creator takes it away, can't give it to you anymore! What traditional people used to do, ceremonies, talking all the time so everyone knew what they had to do; the warriors knew what to do, the chief's knew what to do, the ladies knew what to do, the elders knew what to do-even the kids, like if they were moving from one camp to another camp, everyone had a part so that the whole community moved together. We just didn't go one at a time, we moved all together, this brought the community closer together, cause we were all helping each other and that's the way we shared the blueberries and maple sugar and wild rice. We are all in this world together, so, let's help each other. What we take, put something back, be thankful, we didn't do that because we knew that belonged to Mother Earth, that's probably why we didn't grab the iron ore and all those other metals cause they didn't belong to us, they belonged to mother Earth. So the traditional Indians long time ago, did all kinds of sacred ceremonies, finally dropped the medicine and rights to protect them, to keep them safe. There's less and less of us doing that, so the lake is getting less and less rice out there, because nobody is being thankful-nobody is doing anything to help the lake anymore. It was hard work back then and it still is hard work, but we still do the ceremonies. After it's all over I do a ceremony here in the house. Hopefully, we will be given rice again next year. We keep taking, taking and not giving anything back. What I hope to see done is maybe pick the rice once or maybe twice then let it go, don't rice anymore, let that lake fill up again; guaranteed, in four or five years that lake will fill up again, guaranteed! But if we keep take, take, take and never put anything back, guaranteed, we will lose it-Creator will take it!"

Bernard O'Leary

"My name is Bernard O'Leary, I live at the Vermilion Reservation. I was born February 20, 1932 at the Cloquet Hospital. At the time, we were living in Nett Lake. I lived there from the day I was born up until the late 50's, even though we weren't living there we still came up here every year to pick rice, to pick berries, fished, we picked princess pine. We used to harvest pine cones, everything to use in various things we did, we sold the pine cones too. I guess if you've read history books of what the people at Bois Forte did, you'd find we sold a lot of blueberries and raspberries. It was all a part of making a living. I guess that's what this program is about, to let everybody know how much Bois Forte Band depends on all our natural resources we have whether it's logging, picking berries, picking wild rice, hunting deer, or wild game of any sort and also the fishing. With the rice being our greatest resource, because it's what we use for food, it's very important to do everything that can be done to prevent the loss of wild rice being eliminated even partially should be stopped. The fact that there isn't much rice, as there used to

be before is quite alarming to people who depend on it. I remember when I was a small boy and my mom and dad would prepare to go out to harvest the rice in all these area lakes, they had a pick-up truck and they used to go camping. They had a tent and they picked wherever there was a good crop of rice and we really depended on that. We had all we wanted to eat, plus my dad and ma bought us school clothes. They bought everything we needed after they sold the rice. The rice was a way to earn money for everything we needed back then. My dad would buy half of a beef every fall with that ricing money, so it was an important time for people. So was selling the blueberries. We used to can eighty quarts of blueberries every summer and we canned at least twenty or more quarts of raspberries and we also used to pick a lot of plums. We would pick a lot of plums and pin cherries and make jelly out of that. We had chokecherry jam. We had blueberries on our pancakes in the winter time. So all these natural resources that are here are really important and I bet there are a lot of people yet today including myself, my kids and their families. We all hunt, pick wild rice, blueberries, and fish, and that's kind of a sad story when I talk about fish, because the lakes are so polluted, there's fish advisories where you should only eat so many fish a week and the invasive species thing is getting to be a big problem. When I take my boat to the lake there's someone there at the launch to check and make sure that there's no milfoil and all the different kinds of things that they check for. You know there's getting to be Zebra mussels and all kinds of different foreign species of fish in the St Louis River and that's all in the 1854 ceded territory. So it's a big loss for the Bois Forte people and not only for us, but the general population the non-native people. A lot of them depend on all of these things too. I know a lot of people who are not Native American, that go picking berries and fish so it's for anybody, but manly it's for the Bois Forte people. We for centuries have depended on the land and lakes for our food. I guess I can't stress how important it is to have all our natural resources to stay intact. It's a sad thing to see them going, there ain't nothing like it used to be. You used to be able to get a deer in a couple of hours and the fishing, it used to be that you could go out and get all the fish you wanted, even every day. No I spent three years of ice fishing here on Lake Vermilion and I put in a lot of time and there was one year where all I caught was one white fish! Never seen a walleye, never seen a perch. Talking to some of the people here at the Vermilion Sportsman club, they keep a pretty good eye on what is happening here and there is some red species of crawdad of something that is eating up the weeds and the population of the perch is really low and there's weeds in every bay that had to be gotten rid of. I guess if we were to start naming all the problems and things that are causing this, it's a pretty sad situation. Oh ok, I guess that something has to be done to slow this down, or to stop it or even reverse it and get our natural resources coming back, because there's a lot of people who depend on what we have here in Northern Minnesota-Thank you! I'd like to further comment on this map I am looking at, of what's happening at the UTAC plant. I guess I don't know exactly what is being done, but I'd like to say that eliminating any wetland is never a good idea, because you are eliminating habitat for many different plants, fish, frogs, wild rice, berries, high bush cranberries; there's a lot of stuff that wetlands have. Looking at this map, on the north side is the St Louis River and whatever is seeping out of these tailings basins that's going to end up into the St Louis River and

ultimately into Lake Superior. So, it seems that with all these mines opening up around here, we're losing a lot of timber, wetlands; whatever we need it's going to affect our wild rice crops, our hunting. It's just not a very good idea. That looks like that area might be at least three and a half miles long by probably in spots, two miles wide that's a lot of wetlands to use and being where it is, it looks like a drainage area which is, there's other rivers there. It just ain't good! Our main concern of course is the wild rice and the natural habitat that is eliminated. I just don't believe as a Bois Forte band member, I don't believe that should happen."

Ron King

"I'm Ron King. I lived and grew up in Eveleth most of my life; just recently moved up to Orr, MN three years ago. Now the area we are looking at on the map I believe it's just south of Eveleth in the Zim area between Zim and Cotton. If it was in the Zim area, I have relatives living there, so I've done some hunting and fishing there. Highway 4 goes all the way from Virginia to Duluth, I traveled that way quite a lot and they have that new Forbes mine, it's part of the Eveleth Mines. When they created that my dad used to have horses out on Perry Road, which was south of Eveleth, with a guy named Butch Geefer, I was about seven years old a lot of the houses that were there are not there anymore, they actually got rid of the highway that was there. I think it was the late 70's we did a tree plantation out in that area, we planted thousands of them and I don't know how much they've grown, if at all. I was out there again, about seven years ago. Everything is changed out there. The wetlands, you can't even see the pine forest that should have been there from the thousands of trees we planted--there is a few. There's a lot of little lakes in the area in question, I think it was in the seventies that they moved the plant from Eveleth to the Zim area (Forbes Plant). It's not right off Highway 4, its back where you don't see the pits, they are further back. I think they go back towards Highway 52 and in towards Hibbing that way. But they don't have the lakes that were in there, and they've lost a lot of wetlands. I guess I've never been into that mining company, UTAC. Like I've been over to Mt Iron in that mine and I've worked in the Hibbing Taconite plant doing construction for the Draywell Company out of Virginia. In all of these plants, we had to go in there to make footings for buildings that were being put up in Hibbing. That's a big mining company too. I guess my concern overall is the pollution they put in the air, it affects the wild life, I think the only things that's surviving right now is the wolves, the deer count is down. I used to snare rabbits over that way too, that slowed down too, either that or it was getting too close to summer. There's not too much more I know of the Forbes area, we used to watch the smoke rise out of those plants (I wonder if there still is rice on Round Lake like the map claims) And, as far as lakes with rice on them, I just can't remember wild rice growing on any of these lakes that are on the map. North of Virginia there is a river which I think I've talked about before but that one is just deteriorating there's just barely a little rice on it. But I think it's because of the chemicals they send up into the sky, they travel miles and miles on the wind actually, in the winter you can see the discoloration on top of the snow when you travel the Zim area. When I visited Donny King in that area I don't think it affected the trees, but season after season of that dust looking stuff going into the ground

would have an effect on the plant life and wild rice. On highway 16 in Cook County, actually the Cook county Line changes from Highway 16 to highway 15. I've done a lot of moose hunting around there, my sister Cheryl and I used to rice on Breda Lake in that area, we had to paddle in about two miles up a little river to get to it and that rice used to be big, beautiful kernels. It grew real thick and it was almost as good as Bois Forte used to be; big lone kernels and it was canoe full all the time. I spent many years going up and down that river, eventually the rice began to diminish. You get the reports every year from the 1854 on the lakes. Big Rice Lake, Twin Lakes, all the lakes that had rice growing, but doesn't grow anymore. The same with Breda, it's not a big lake, so you get a couple boats in there and it's picked out in a day. It's just not like it used to be. There's a river by Biwabik, it may be the Embarrass River, we used to harvest all these lakes that had wild rice and had good pickings. Now I'm down to the Vermilion River and Nett Lake, that's it! The only places I go."

Marybelle Connor Isham

"I am repeating the words of Heather Friedli Ratzloff exactly as she wrote them. 'Let's not forget my ancestors who walked, hunted, worshipped, and lived on this land before, during and after contact with white settlers.'"

"My name is Marybelle Connor Isham. I was born and raised on the Bois Forte Indian Reservation until the age of eighteen, when I married and left the reservation. We are Ojibwe people, also known as Anishinaabe, or Chippewa. The nomadic life of our people was before my time, but my heart goes out to our ancestors, who suffered such hardships of having to depend on seasonal food and whether the food for that season is abundant or not a good season or not having enough to last through the harsh winter.

"I am going to describe our reservation briefly. I left the area at quite a young age, but never missed a rice harvest season. I'm back home now! Our reservation is built on a peninsula on a lot of rock, with water and swampland surrounding it. We have a huge amount of clay in the soil, so it is necessary to buy soil suitable for planting seeds and growing a garden. My generation was the depression era. We relied greatly on what we could grow. We still rely on the seasonal food. In the spring, it's the sugar bush, which reminds me of the early maps of the area in question, and it shows a sugar bush at Murphy Lake and 1854 Treaty Authority reports Round Lake supports wild rice. There is also setting nets in the spring for fish. This is a great time and we can feast on fresh fish. Netting season as well as sugar bush season doesn't last very long. There is not a danger of depleting the resources, or using it all up. The summer season is more plentiful. The bears are out of hibernation, ducks and geese are back from migration and more fish can be stored and also mushrooms and other forest plants. Our ancestors preserved all the vegetables, fruits, and berries. The Ojibwe people realized that cattail roots made great food, eaten like potatoes. They also dug wild onions and picked wild grapes, butternuts, hazel nuts, and many types of berries. As with their harvests of each season, they offered tobacco as a sign of respect, and as a spiritual offering for the food. In the fall, the harvesting of wild rice is about the most important food for the Ojibwe people. Legend has it, the Ojibwe people were told by

prophets to travel west from their ancestral homelands on the Atlantic Coast to ‘the land where food grows on water.’ The land is the wild rice country of Minnesota, Wisconsin, Michigan, Ontario, and Manitoba.

I am reminded of another journey in which the Creator fed his people for the forty years that they remained in the wilderness on a substance called manna. The dictionary describes manna as “something of value that comes one’s way”. I find it hard to express the value we place on wild rice, both spiritually and economically. I hear from others, and have experienced it myself, the effects of a loss of a staple that you feel that you cannot be without. Wild rice and maple sugar are the most hardy for storing and keeping. These foods were probably the difference between life and death in some instances. They are called ‘super foods’ providing calories and nutrients. We have freezers now to freeze the fish, grouse, deer and moose that are hunted in the fall, but our ancestors had to dry and pack away all they could acquire for a long winter. Winter hunting for the Ojibwe people was fishing through the ice, trapping beaver and other animals for meat and pelts. A favorite of mine is the snowshoe rabbit. My mom fixed the snowshoe hare many different ways. Yum! I can still taste the soup!

The St. Louis River is on the map of the UTAC tailings basin expansion. I have an article taken from the historical Trygg files previous to year 1840. This article is written by Reverend T. M. Fullerton, describing what he sees while riding in a boat on the St. Louis River. ‘The river at it’s mouth is less than a quarter mile wide and obstructed by a sandbar holding countless snags; but on passing this a few rods, brings the boat beyond the bend into calm, deep water in any weather. At the head of the bay the traveler is in want of a pilot, as there are numerous channels. *From that point to the falls, the river is full of islands and fields of wild rice*’” (emphasis added).

“This leads to a question that I have! I have a map of the 1854 Ceded Territory. According to the map, the UTAC tailings basin is within the ceded territory. I am curious to know the procedure of procuring the land for mining when there is a treaty in place; The treaty of September 30, 1854 (ratified January 10, 1855) at La Porte, Wisconsin or Madeline Island?”

Discussion

Traditional Ecological Knowledge (TEK) is a system of understanding one's environment based on observations and experience. It is built over generations as people who depend on the environment for their food, materials, and culture gain understanding of how the variables comprising the ecology interact. The Bands have special knowledge of the 1854 ceded territory because they have lived there for hundreds of years. Local knowledge systems are based on the shared experiences, customs, values, traditions, lifestyles, social interactions, ideological orientations and spiritual beliefs specific to Native communities. This understanding evolves as new knowledge is obtained and generated (Environmental Protection Agency 2014).

The six questions asked of the elders interviewed for the UTAC traditional properties survey were designed to provide information about the project area not generally available through conventional methods advocated during an environmental review process. Our intent

was to obtain specific information on the types of activities conducted, resources gathered, hunted or obtained, how they were accessed and components of spirituality.

One of the interviewees, Dayshun Goodsky, spoke about his recollections in the vicinity of the Minntac tailings basin, located almost 20 miles north of the project area. Clearly, the area north of Mountain Iron is a place in which he is interested.

The interviews indicate that until a few decades ago, vestiges of traditional Ojibwe life ways were pursued when and where possible. Admittedly, patterns had been extensively disrupted by changes in landownership, poverty, reservation life and the lack of economic opportunity. However, interviewees confirm that the old ways remain imbedded in the Ojibwe worldview as respondents speak of ricing on rivers and when possible, State lakes, such as Perch and Round Lakes.

Ricing was described by all of the interviewees, although only two, Becky Gawboy and Ron King, specified areas close to the proposed tailings basin expansion. Curiously, Ron does not recall rice on any of the small lakes in proximity to the project area. In contrast, Becky Gawboy notes recently eating wild rice obtained by their sons at Stone Lake and that Perch and Round Lakes produce good rice.

Berry picking, in particular blueberries, was mentioned by all of the elders. Ruby Boshey noted that parents and grandparents taught the younger generation how to pick berries and included them when the family went berry picking. Bernie O'Leary spoke eloquently on the importance of berry picking to his family, stating: "We used to can eighty quarts of blueberries every summer and we canned at least twenty or more quarts of raspberries and we also used to pick a lot of plums. We would pick a lot of plums and pin cherries and make jelly out of that. We had chokecherry jam. We had blueberries on our pancakes in the winter time. So all these natural resources that are here are really important and I bet there are a lot of people yet today including myself, my kids and their families."

Hunting, in particular deer hunting, was also described. One respondent, Ron King noted that he had hunted deer as well as rabbits proximal to the project area. Another interviewee, Bernard O'Leary, laments the declining fish and game populations attributing the decline to pollution and invasive species. He also notes the importance of game and fish to his family and emphasized that the Band's usufructuary rights are important for his family's welfare.

Concern about the loss of usufructuary rights was expressed by the interviewees. Several noted the disappearance of rice or diminishing productivity and kernel size. Some attributed the depletion to pollution, others thought introduced species and climate were culprits. All expressed concern about the loss of resources and worried about the consequences should the trend continue.

Four interviewees discussed spirituality. Becky Gawboy acknowledged the sacred nature of the land and this theme was reiterated and expanded upon by Lester Drift. He notes that ceremonies were conducted at every place where Band members obtained something; giving thanks for success in ricing, hunting and fishing among other things. At Nett Lake these ceremonies still take place and he feels that every lake and Indian campground, wherever Native

Americans lived or moved, sacred ceremonies occurred. Furthermore, Lester feels strongly that the whole northern part of Minnesota is sacred especially all of the lakes with wild rice. In fact, Lester's entire interview is a call for understanding that we are all in this world together and we should help one another. When something is taken, be thankful and put something back to show appreciation. Ruby Boshey explains that one of the first things taught to children is to offer tobacco in appreciation of the things that would be provided by the Creator.

The importance of medicinal plants to Band members was noted by Lester Drift and Jim Gawboy. Mr. Gawboy noted the importance of medicinal plants found in bogs such as swamp tea. Mr. Drift explained that plants across the Iron Range can be used medicinally. He further states that a plant exists to heal every illness. Bernard O'Leary mentioned collecting princess pine with his parents, but did not mention how it was used.

Of some note, two interviewees, Ruby Boshey and Ron King, mention the importance of iron mining to their families. Ruby's husband worked for Minntac and Ron helped in construction of portions of Hibtac.

Trails, actually canoe routes were mentioned by only one person, Jim Gawboy. He described paddling a route from Murphy Lake to Stone Lake sometime before 1965, noting that it was difficult due to being overgrown with brush. He notes that canoe routes used by Indians need not be deep or wide, but did need to be kept clear of brush in order to be useable. He had made the journey as he was a Minnesota game warden and the region was within his patrol area. He had not been on that creek before and questioned his decision before he was done. He goes on to describe possible routes for access into the project area via the St Louis River. In an earlier interview (Latady and Isham 2014), Becky Gawboy, comments that trails, in particular rivers, connected numerous native villages. Prior to the fur trade and the introduction of European diseases, native communities were ubiquitous; unlike now when native communities are confined to reservations.

Maple sugaring is mentioned by Lester Drift and Marybelle Isham, although not in terms of a specific locale within or even close to the project area. Both note the significance of maple sugaring spiritually and economically.

These last two topics, trails and sugar camps, are noteworthy as the Trygg map (1966, sheet 18) depicting this area shows a sugar camp on Murphy Lake and the "Indian Trail to Stone Lake" that originates at the St. Louis River. Evidently the trail portrayed on the Trygg map is the one followed by Jim Gawboy in the early 1960's. However, the archival searches, including the U.S. Land Surveyors' field notes, did not contain any references to trails, portages or sugar camps within the township or adjoining townships. It is conceivable that these features were plotted incorrectly or information on which the depictions are based was obtained from one or more of Trygg's informants.

The interviews revealed that there are few specifics known or recalled by the interviewees within the proposed UTAC Tailings Basin Expansion project APE. Rice from Lakes within the APE was mentioned by Becky Gawboy and Ron King wondered if rice still

grew on those lakes. More than 50 years ago Jim Gawboy, canoed some of the streams between the small lakes, but has not done so since that time.

Conclusions

Band members with knowledge of historic traditional practices or resource use in the general area of the UTAC Tailings Basin 3 Project provided information about when, how and where usufructuary rights were practiced. Unfortunately little is recalled about activities of Band members within the APE, although two elders noted having been in the area and one mentioned hunting. Another elder described eating rice from lakes within the APE. Overall there is a deficiency in detail which is a characteristic of interviews conducted for other projects. Were we able to interview elders from a generation or two prior to this one, there would have been considerably more information.

However, these interviews added to our knowledge of use of the area by Band members in that usufructuary rights were practiced in the vicinity of the UTAC Tailings Basin by Band members who lived off the reservation. Four individuals, Jim Gawboy, Becky Gawboy, Ronald King and Bernard O'Leary stated their concerns about the effects of mine expansion and the loss of traditional resources.

Spiritual activities were another topic covered by interviewees. Band members identified medicinal plant gathering, offering tobacco and other ceremonies. Three interviewees, Lester Drift and Becky Gawboy, spoke of the sacred nature of the earth and the importance of giving thanks for the gifts the land bestows.

Perch, Round and Stone Lakes were described by one interviewee as being good for ricing. Another noted traditional ways of accessing in lakes the area through canoes using even the smallest streams, provided the streams were clear of brush. Clearly in recent years ricers made day trips to the lakes, but historically people may have camped on the lakes being riced. An archaeological inventory of the lakeshores would probably reveal the location of camps used historically and in antiquity.

As noted in previous reports (Latady and Isham 2011, 2012, 2013, 2014) the importance of wild rice to the Bois Forte Band and indeed the Ojibwe as a whole cannot be overstated. Indeed, Latady and Isham (2013) affirm that "Manoomin (wild rice) is not only an important food, but also the center of Ojibwe life as it is the reason for the westward migration, which for Bois Forte culminated in their arrival in northeastern Minnesota. Manoomin appeared in the vision received by an elder on the east coast that initiated the Anishinabe migration to find the food that grows on water." The drastic reduction of wild rice in areas where it was once abundant is a continual concern to all Ojibwe and in this area of particular distress to Bois Forte Band members.

Results for questions on information about trails and travel corridors were disappointing. Historically, as noted by Jim Gawboy, travel proceeded via foot trails and waterways, and in modern times through the use of motor vehicles along roads. Trails were used to access locations

as traditional travel routes were abandoned once other forms of transportation became available. In the last 60 years Band members often travelled to ricing areas by vehicle, but once there used traditional harvest methods to pick rice. By the time many of the elders alive today were born, traditional travel corridors and routes were rarely used and may account for the lack of detail on the locations of trails.

The loss of traditional life ways within the 1854 Ceded Territory is an ongoing concern and is expressed in many of the interviews. The decline in wild rice, but also game animals and fish was attributed to pollution, climate changes and invasive species. Concern about mine impacts to traditional ways was also voiced by interviewees.

The lack of detailed information about traditional activities within the UTAC Tailings Basin 3 Project APE is a little surprising given that one of the interviewees grew up in the area. During discussions with the Corps of Engineers before this project was initiated, the authors hoped Band members might recall the sugarbush or accessing Stone Lake by the old trail from the St Louis River plotted on the Trygg maps. Unfortunately, these expectations did not materialize and the authors were unable to even find the records upon which Trygg relied for the information.

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2013 Identification of Historic Properties of Traditional Religious and Cultural Significance to the Bois Forte Band in the Minntac Progression Project Area of Potential Effect. File, Bois Forte Heritage Museum, Tower.

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William A. Kindred

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18 Trygg Land Office, Ely, Minnesota.

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April 13, 2015

VIA ELECTRONIC FILING

The Honorable Ann O'Reilly
Office of Administrative Hearings
PO Box 64620
St. Paul, MN 55164-0620

Re: *In the Matter of the Request by Minnesota Power for a Route Permit for the
Great Northern Transmission Line*
Landowners Jason, Greg and Maynard Braaten Letter
MPUC Docket No. E015/TL-14-21
OAH Case No. 65-2500-31637

Dear Judge O'Reilly:

Please find enclosed to be included for consideration in the above-referenced Docket a letter by Landowners Jason, Greg and Maynard Braaten in support of Minnesota Power's Great Northern Transmission Line Proposed Route dated April 15, 2014. Copies of this letter will also be filed with the United States Department of Energy for consideration in its federal Presidential Permit determination in OE Docket No. PP-398. This letter and resolution has been filed with the E-Docket system and served on the attached service list.

Yours truly,

David R. Moeller
Senior Attorney
Minnesota Power

DRM:sr
Enc.

Minnesota Power is suggesting the construction of the 500 KV Great Northern Transmission Line from the Manitoba/Minnesota international border in Roseau County to the Blackberry Substation in Itasca County by June 1, 2020. Minnesota Power is partnering with Manitoba Hydro to build this line that will distribute, clean renewable hydropower from northern Manitoba to Minnesota and the upper Midwest. Minnesota Power has been working with Roseau County residents and landowners in Roseau County, for over three years to develop and improve a route for this project that delivers the least amount of impact to the area’s residents and landowners.

This voluntary outreach included multiple open houses in Roseau County, in addition to the required legal notices to Roseau County and multiple public hearings on the need for the Great Northern Transmission Line. In October 2014, Minnesota Power submitted to the United States Department of Energy an amendment to its border crossing based on the consultation with landowners and stakeholders in Roseau County that the originally proposed border crossing was no longer feasible given constraints from the future expansion of the Piney-Pinecreek Border Airport and the Roseau Wildlife Management Area. With this new information, Minnesota Power and Manitoba Hydro reached an agreement on a new border crossing that would originate at te Minnesota-Manitoba border roughly 2.9 miles east of Highway 89 in Roseau County. It would proceed southwest 0.2 miles and then travel south 2.3 miles to 390th Street and turn east following Minnesota Power’s proposed Blue and Orange Routes as indicated in its April 15, 2014 Route Permit and Presidential Permit applications.

During the scoping process for the environmental impact statement, additional border crossings were proposed by the Minnesota Department of Natural Resources and private landowners, and four of these additional border crossings were carried forward by the Minnesota Department of Commerce into the scope of the draft environmental impact statement. As a land owner in Roseau County, I strongly oppose the proposed route alternatives in Roseau Cunty, submitted by the Minnesota Department of Natural Resources and the United States Fish and Wildlife Service that were done without input from Roseau County officials and land owners. Including the Roseau Lake WMA Alternative, due to more impacts on private landowners and agricultural land use and interfering with a public airport. It is in the best interest of residents in Roseau County that the impacts to the agricultural land uses and human settlements be minimized, and Minnesota Power’s proposed route appears to accomplish those objectives. The route alternatives submitted by the Minnesota Department of Natural Resources and the United States Fish and Wildlife Service negate over three years of good faith participation of Roseau County residents, in working collaboratively with Minnesota Power to route the Great Northern Transmission Line in a manner that attempts to provide the least impact to residents and landowners. As a land owner. I support Minnesota Powers preferred route as submitted on April 15, 2014 and Minnesota Power’s proposed border crossing as submitted in October 2014 to the United States Department of Energy.

Jason Braaten, Roseau county land owner

Greg Braaten, Roseau county land owner

Maynard Braaten, Roseau county land owner

0207-1

The alternatives that are evaluated in the EIS were provided during the scoping process and were developed to address concerns associated with the Proposed Blue and Orange Routes. For each alternative, the land use, land ownership, proximity to airports, and length of the alternatives, are discussed in the EIS. No changes are made to the EIS in response to this comment.

0207-1

STATE OF MINNESOTA)
) ss AFFIDAVIT OF SERVICE VIA
COUNTY OF ST. LOUIS) ELECTRONIC FILING AND
 U.S. MAIL

Susan Romans of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 13th day of **April, 2015**, she served Minnesota Power's Letter to the ALJ in OAH Case No. 65-2500-31637 and PUC Docket No. E015/TL-14-21 regarding **Landowners Jason, Greg and Maynard Braaten Letter** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The remaining parties on the attached service list were served as indicated.

Susan Romans

Exhibit __ Schedule (JBA Supplemental-4), Page 127 of 221

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_14-21_Official CC Service List
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_14-21_Official CC Service List
Michael	Kaluzniak	mike.kaluzniak@state.mn.us	Public Utilities Commission	Suite 350 121 Seventh Place East St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_14-21_Official CC Service List
David	Moeller	dmoeller@allte.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_14-21_Official CC Service List
Ann	O'Reilly	ann.oreilly@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_14-21_Official CC Service List
Janet	Shaddix Elling	jshaddix@janeshaddix.com	Shaddix And Associates	Ste 122 100 W Bloomington Bloomington, MN 55431	Electronic Service	Yes	OFF_SL_14-21_Official CC Service List
Tracy	Smetana	tracy.smetana@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_14-21_Official CC Service List
William	Storm	bill.storm@state.mn.us	Department of Commerce	Room 500 85 7th Place East St. Paul, MN 551012198	Electronic Service	Yes	OFF_SL_14-21_Official CC Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinistine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_14-21_Official CC Service List

Exhibit __ Schedule (JBA Supplemental-4), Page 128 of 221

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sarah	Beimers	sarah.beimers@mnh.s.org	Minnesota Historical Society	345 Kellogg Boulevard West St. Paul, MN 55102	Electronic Service	No	SPL_SL_14-21_Agency Reps 14-21
Tamara	Cameron	tamara.e.cameron@usace.army.mil	U.S. Army Corps of Engineers	180 5th St. # 700 Saint Paul, MN 55101	Electronic Service	No	SPL_SL_14-21_Agency Reps 14-21
Travis	Germundson	travis.germundson@state.mn.us	Board of Water & Soil Resources	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	SPL_SL_14-21_Agency Reps 14-21
Brooke	Haworth	Brooke.Haworth@state.mn.us	Department of Natural Resources	500 Lafayette Road Saint Paul, MN 55155	Electronic Service	No	SPL_SL_14-21_Agency Reps 14-21
Susan	Helfron	susan.helfron@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	SPL_SL_14-21_Agency Reps 14-21
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Ray	Kirsch	Raymond.Kirsch@state.mn.us	Department of Commerce	85 7th Place E Ste 500 St. Paul, MN 55101	Electronic Service	No	SPL_SL_14-21_Agency Reps 14-21
Stacy	Kotich	Stacy.Kotich@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul, MN 55155	Electronic Service	No	SPL_SL_14-21_Agency Reps 14-21
Debra	Moynihan	debra.moynihan@state.mn.us	MN Department of Transportation	395 John Ireland Blvd MS 620 St. Paul, MN 55155-1899	Electronic Service	No	SPL_SL_14-21_Agency Reps 14-21
Bob	Patton	bob.patton@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	SPL_SL_14-21_Agency Reps 14-21

Exhibit __ Schedule (JBA Supplemental-4), Page 129 of 221

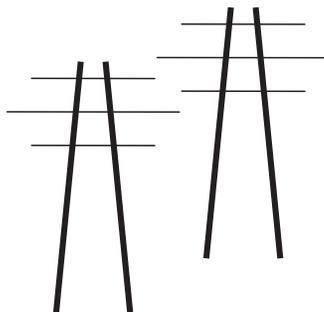
First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Margaret	Rheude	Margaret_Rheude@hws.gov	U.S. Fish and Wildlife Service	Twin Cities Ecological Services Field Office 4101 American Blvd. E. Bloomington, MN 55425	Electronic Service	No	SPL_SL_14-21_Agency Reps 14-21
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Jamie	Schrenzel	jamie.schrenzel@state.mn.us	Minnesota Department of Natural Resources	500 Lafayette Road Saint Paul, MN 55155	Electronic Service	No	SPL_SL_14-21_Agency Reps 14-21
David	Seykora	dave.seykora@state.mn.us	MN Department of Transportation	395 John Ireland Boulevard Mail Stop 130 St. Paul, MN 55155-1899	Electronic Service	No	SPL_SL_14-21_Agency Reps 14-21
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0208-1

The response to your questions are provided in the letter (dated June 24, 2015) sent to you by Mr. Bill Storm and Dr. Julie Smith on June 24, 2015 (eDocket 14-21, document 20156-111735-01). The letter is also attached as the next 8 pages after this comment letter.

No changes are made to the EIS in response to this comment.

June 23, 2015

Julie Ann Smith, PhD
Electricity Policy Analyst
DOE National Electricity Delivery Division (OE-20)
1000 Independence Avenue SW
Washington, DC 20585

via email: JulieA.Smith@hq.doe.gov

William Cole Storm
Environmental Review Manager
Energy Environmental Review and Analysis
85 7th Place East, Suite 500
Saint Paul, Minnesota 55101

via email: bill.storm@state.mn.us

RE: Great Northern Transmission Line – DEIS Public Hearings
PUC Docket No. TL-14-21; DOE No. EIS-0499

Dear Ms. Smith and Mr. Storm:

I've reviewed the Notice of Availability for the GNTL DEIS, and note that there are public "meetings" planned, and not public hearings. Is this consistent with the requirements of NEPA?

What is your authority for holding public "meetings" rather than public "hearings?" Will people making public comments at meetings be offered the option of making their comment under oath? Will there be a publicly available transcript made?

Thank you for your consideration of these points.

Very truly yours,

Carol A. Overland
Attorney at Law

cc: David Moeller and Eric Swanson, Great Northern Transmission Line via eService

0208-1



85 7TH PLACE EAST, SUITE 500
SAINT PAUL, MINNESOTA 55101-2198
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651.539.1500 FAX: 651.539.1547
AN EQUAL OPPORTUNITY EMPLOYER

June 24, 2015

Carol Overland
1110 West Avenue
Red Wing, Minnesota 55066

RE: Great Northern Transmission Line – Draft EIS Public Hearings/Meetings
PUC Docket No. TL-14-21; DOE/EIS-0499

Dear Ms. Overland:

I writing to you in response to your letter dated June 23, 2015 (eDocket 20156-111703-01) regarding the joint federal public hearings and state informational meetings on the Great Northern Transmission Line (GNTL) Draft Environmental Impact Statement (DEIS).

Attached is a response letter from Dr. Julie Smith, NEPA Document Manager, National Electricity Delivery Division (OE-20) U.S. Department of Energy (DOE). The Department of Commerce Energy Environmental Review and Analysis (DOC EERA) staff concurs with the DOE statement, feels that the response adequately addresses your concerns, and does not have further comments.

Please feel free to contact DOC EERA staff if you require additional assistance.

Sincerely,

William Cole Storm, DOC EERA Staff



Department of Energy
Washington, DC 20585

June 24, 2015

Carol Overland
1110 West Avenue
Red Wing, Minnesota 55066

1 Stewart Street
Port Penn, Delaware 19731

RE: Great Northern Transmission Line – Draft EIS Public Hearings
PUC Docket No. TL-14-21; DOE/EIS-0499

Dear Ms. Overland:

I writing to you in response to your June 23, 2015 letter addressed to me and Bill Storm, Environmental Review Manager, Minnesota Department of Commerce – Energy Environmental Review and Analysis, regarding the joint federal public hearings and state informational meetings on the Great Northern Transmission Line (GNTL) Draft Environmental Impact Statement (DEIS). Thank you for your inquiry and I appreciate the opportunity to clarify the federal public hearing process on the GNTL DEIS for you.

First, I must ask that you disregard the response to your inquiry that was provided to you by Mr. Kaluzniak of the Minnesota PUC staff via email on June 24, 2015 at 8:14 a.m. regarding the federal review and comment process. The information Mr. Kaluzniak provided to you in that email is inaccurate and this letter not only addresses your inquiry but also to correct for the misinformation about DOE's process in the referenced email.

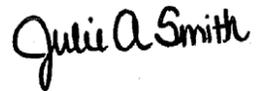
In response to your question regarding the notice that you received about the joint federal and state public comment period and public hearings/informational meetings, DOE is conducting federal public hearings on the subject DEIS according to both Council on Environmental Quality's and DOE's National Environmental Policy Act (NEPA) regulations at 40 CFR Part 1500 and 10 CFR Part 1021, respectively; DOE is not conducting 'meetings.' The title of this Notice is very clear with regard to its subject and that among the public comment opportunities planned are both state informational meetings and federal public hearings but that they are being held jointly in order to reduce duplication of effort and process.

As to the nature of how public comments will be provided to DOE at the joint federal public hearings and state informational meetings: DOE accepts oral comments on an DEIS during its public hearings and these comments are recorded (as were public scoping comments) by a court recorder. There is no "option," as you suggest in your inquiry, to provide comments under oath. I will be present at all eight jointly planned federal public hearings and state informational meetings, acting as the federal hearings officer, and you will be provided the opportunity to sign up to provide oral comments upon arrival at the hearing/meeting locations. The record of public comments (transcripts) of the joint federal public hearings and state public information meetings will be made publicly available following the close of the comment period.

Finally, DOE will not be participating in the MN Public Utilities Commission (PUC) Public and Evidentiary Hearings; these are hearings are solely a part of the state Route Permit process and are not held for the purposes of the federal Presidential permit decision and related NEPA process. DOE is not a party to the PUC Evidentiary Hearings process on this project.

Again, thank you for your inquiry and the opportunity to address your questions about the public comment process for the GNTL DEIS and to clear up any misinformation about the jointly planned DOE public hearings and MN DOC public information meetings on the GNTL DEIS planned for the dates, times and locations provided in the Notice of Availability that you received.

Sincerely,

A handwritten signature in black ink that reads "Julie A. Smith". The signature is written in a cursive, flowing style.

Julie Ann Smith, PhD
NEPA Document Manager
National Electricity Delivery Division (OE-20)
U.S. Department of Energy

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Letter to Carol Overland**

Docket No. E015/TL-14-21

Dated this **24th** day of **June 2015**

/s/Sharon Ferguson

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David	Moeller	dmoeller@state.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_14-21_Official CC Service List
Ann	O'Reilly	ann.oreilly@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_14-21_Official CC Service List
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Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_14-21_Official CC Service List

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Sarah	Beimers	sarah.beimers@mnhs.org	Minnesota Historical Society	345 Kellogg Boulevard West St. Paul, MN 55102	Electronic Service	No	SPL_SL_14-21_Agency Reps 14-21
Tamara	Cameron	tamara.e.cameron@usace.army.mil	U.S. Army Corps of Engineers	180 5th St. # 700 Saint Paul, MN 55101	Electronic Service	No	SPL_SL_14-21_Agency Reps 14-21
Travis	Germundson	travis.germundson@state.mn.us		Board of Water & Soil Resources 520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	SPL_SL_14-21_Agency Reps 14-21
Susan	Heifron	susan.heifron@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	SPL_SL_14-21_Agency Reps 14-21
Karl	Howe	karl.howe@state.mn.us	DEED	332 Minnesota St. #E200 1ST National Bank Bldg St. Paul, MN 55101	Electronic Service	No	SPL_SL_14-21_Agency Reps 14-21
Ray	Kirsch	Raymond.Kirsch@state.mn.us	Department of Commerce	85 7th Place E Ste 500 St. Paul, MN 55101	Electronic Service	No	SPL_SL_14-21_Agency Reps 14-21
Stacy	Kotch	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul, MN 55155	Electronic Service	No	SPL_SL_14-21_Agency Reps 14-21
Debra	Moynihan	debra.moynihan@state.mn.us	MN Department of Transportation	395 John Ireland Blvd MS 620 St. Paul, MN 55155-1899	Electronic Service	No	SPL_SL_14-21_Agency Reps 14-21
Bob	Patton	bob.patton@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	SPL_SL_14-21_Agency Reps 14-21
Margaret	Rheude	Margaret_Rheude@fws.gov	U.S. Fish and Wildlife Service	Twin Cities Ecological Services Field Office 4101 American Blvd. E. Bloomington, MN 55425	Electronic Service	No	SPL_SL_14-21_Agency Reps 14-21

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David	Seykora	dave.seykora@state.mn.us	MN Department of Transportation	395 John Ireland Boulevard Mail Stop 130 St. Paul, MN 55155-1899	Electronic Service	No	SPL_SL_14-21_Agency Reps 14-21
Bruce	West	Bruce.West@state.mn.us	Department of Public Safety	Box 145 444 Cedar Street St. Paul, MN 55151	Electronic Service	No	SPL_SL_14-21_Agency Reps 14-21
Jonathan	Wolgram	Jonathan.Wolgram@state.mn.us	Department of Public Safety	445 Minnesota Street Suite 147 St. Paul, MN 55101-1547	Electronic Service	No	SPL_SL_14-21_Agency Reps 14-21