Appendix E

Cultural Resources Review

Phase I Archaeological Survey for the Proposed Clearbrook West Transmission Line in Clearwater County, Minnesota

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MANAGEMENT SUMMARY

Minnkota Power Cooperative, Inc. ("Minnkota Power") is planning to build a new 5.3-mile long, 115 kilovolt (kV) electric transmission line and a new 115/4.16 kV substation. The proposed project will start in Leon Township by tapping an existing 115 kV line via construction of a 1-way switch and the proposed project will end in Pine Lake Township at the new 115/4.16 kV substation. The proposed project is needed to serve a single industrial load in the Clearbrook, Minnesota area. The proposed project is located in T149N, R37W, Sections 28, 29, 30, 31, 32, and 33; and T149N, R38W, Sections 23,25,26,35, and 36 in Clearwater County, Minnesota.

Barr Engineering contracted with *10,000 Lakes Archaeology, Inc.* to conduct a Phase I archaeological survey of high potential locations for this proposed project. The survey took place October 20-24, 2014, and located no previously unrecorded archaeological sites. One recorded site is located at the far western end of the project corridor. This site was determined *not potentially eligible* for the National Register of Historic Places in 2014. Based on the results of the survey, *10,000 Lakes Archaeology* recommends that the project, as proposed, will not affect any archaeological resources. However, two cemeteries are within the Area of Potential Effect (APE). Thus, *10,000 Lakes Archaeology* recommends that the two cemeteries be avoided, and that the project be allowed to proceed as planned.

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INTRODUCTION

Minnkota Power Cooperative, Inc. ("Minnkota Power") plans to build a 5.3-mile long, 115 kilovolt (kV) electric transmission line and 115/4.16 kV substation. The project starts in Leon Township by tapping an existing 115 kV line via construction of a 1-way switch and will end in Pine Lake Township at the new 115/4.16 kV substation. The proposed project will serve a single industrial load in the Clearbrook, Minnesota area.

This project extends from south of Clearbrook, in the southwestern corner of Section 28, T149N, R37W west along the southern edges of Sections 29 and 30 (northern edges of Sections 31 and 32) into T149N, R38W. Here the line runs along the southern edge of Section 25 (northern edge of Section 36), then turns north along the eastern edge of Section 26, passing through the northeastern corner of Section 26 and into the southwestern portion of Section 23. The line terminates near the western edge of Section 23 (T149N, R38W) (USGS 7.5 Topo Clearbrook, Minn. 1969) (Figure 1). The proposed corridor for the proposed project varies from approximately 300 to 500 feet wide.

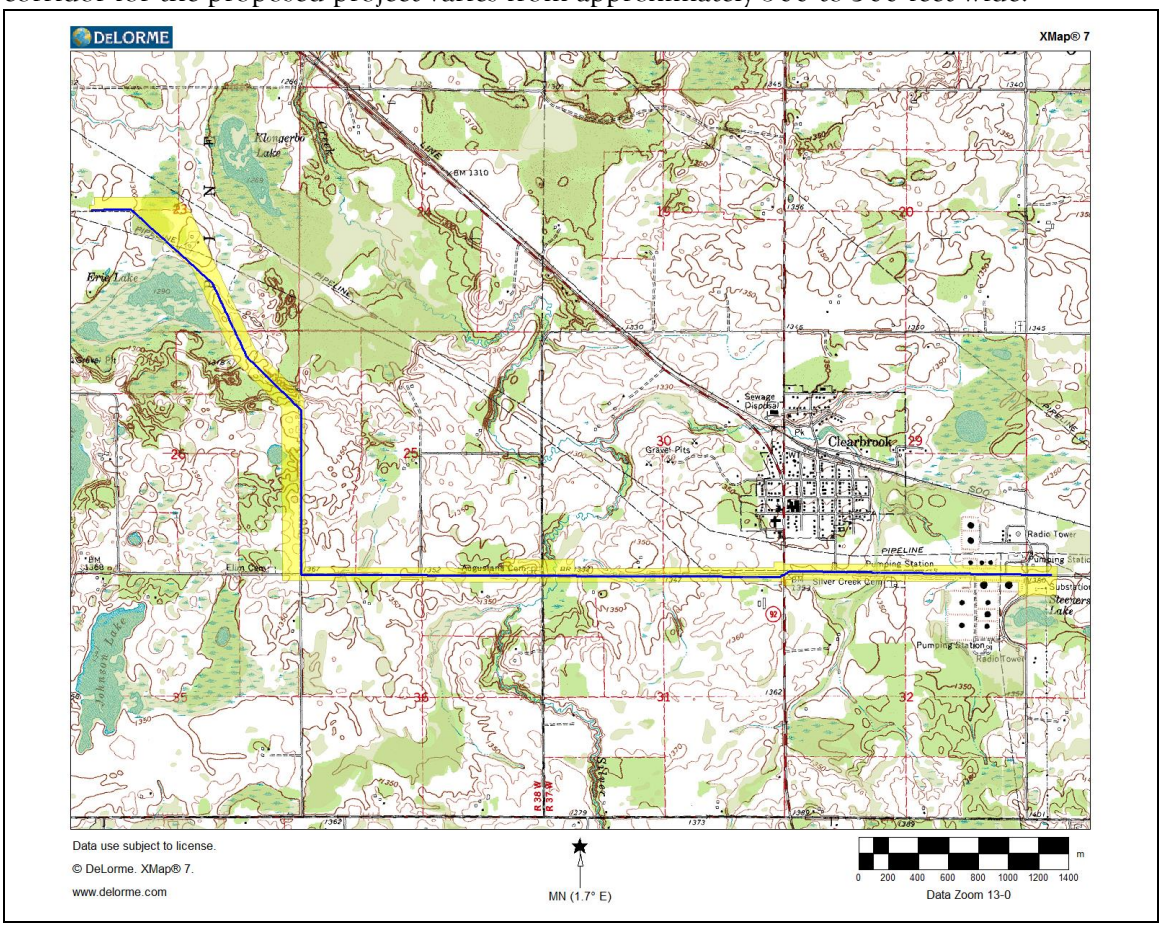

Figure 1. Location of the proposed Clearbrook West Transmission Line (blue) showing APE (yellow).

Cultural History

The Minnesota State Historic Preservation Office (SHPO) has developed several historic contexts for the state of Minnesota and the Upper Midwest. These contexts examine Minnesota's recent (historic) and distant (precontact) past and are based on decades of archaeological and historic research. They are designed to help generally describe and interpret the history of the state and give basic insight into the prevailing theories pertaining to the precontact and historic communities existing in specific locations and at discrete points of time.

The cultural histories focusing solely on American Indian communities are divided into three major traditions: Paleoindian, Archaic, and Woodland. These traditions are defined on the basis of significant changes in how American Indian communities lived. The cultural histories that integrate American Indian and Euroamerican history are generally divided into the Contact and Post-Contact Periods. These contexts range from the first contact between Europeans and American Indians during European exploration in the region, through Euroamerican settlement of traditionally American Indian lands.

The proposed project is located within Archaeological Region 5w (Anfinson 1990). The region consists of hilly terminal moraines as well as ground moraines, outwash plains, and lake plains. Historically, white, jack, and red pines dominated the vegetation, with large pockets of elm, maple, basswood, ash, oak, aspen, and birch. The region also contained significant wild rice beds, and was home to deer, beaver, moose, black bear, waterfowl, and fish (Anfinson 19990: 148-149). Generally, pre-contact American Indians chose habitation sites adjacent to major lakes and rivers, especially at stream intersections in near wild rice beds (Anfinson 1990: 158).

Pre-Contact Period

Paleoindian Tradition (12,000 to 8,000 Before Present [B.P.])

The Paleoindian Tradition refers to the period at the close of the Pleistocene and into the Holocene when American Indian communities were small, mobile, and focused on hunting. Archaeological evidence from Paleoindian sites throughout central United States and Canada indicates that these communities hunted a limited number of large animals in a variety of environmental settings. As the Pleistocene ended and the Holocene began, the megafauna (e.g., mammoth) gradually died out. This caused the Paleoindian people to shift their focus to primarily hunting the largest remaining species, bison. In addition to bison, it is likely that gathering wild plant foods and hunting smaller animals also contributed significantly to the diet of the Paleoindian people.

The distinctive stone tools made by the Paleoindians included large lanceolate projectile points, which changed through time (Figure 2). The projectile points that were made by the early Paleoindians are often fluted, meaning a channel was created from the base running up the middle of the point (see Clovis and Folsom in Figure 3), as opposed to those made later which were not (see Plainview in Figure 4). Because Paleoindian communities were very small and nomadic, archaeologists have found only sparse, scattered evidence of the Paleoindian people.

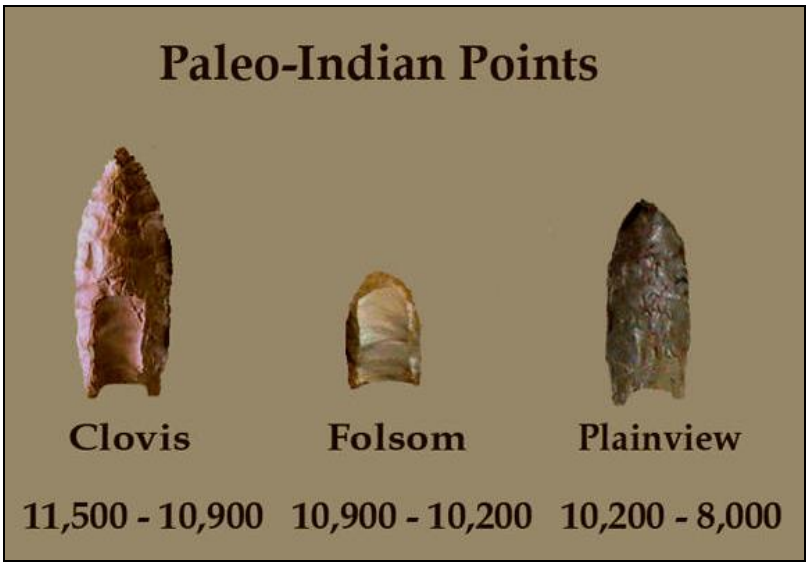

Figure 2. Paleoindian projectile points (Eddins n.d.).

Archaic Tradition (8,000 to 2,800 B.P.)

Shifts in diet and settlement patterns define the transition to the Archaic Tradition. During this period, archaeological evidence suggests that native people were adapting to environmental changes by using more diverse plant and animal resources, and creating and using a broader range of tools including new projectile point forms, atlatls (spear thrower that allowed spears to be thrown farther and with more force), copper tools and ground and pecked stone tools. Although some research suggests that community size increased during the Archaic period, other archaeological evidence counters that assumption, suggesting that community sizes remained small and that day-to-day activities took place at a series of seasonal camps (Anfinson 1987; 1997).

During this period, Archaic people began developing regional differences within their material culture. In Minnesota, this variation appears to have been tied to the natural environment, specifically the plant communities. These variations focused on the "Plains Archaic" in the western prairies, "Eastern Archaic" in the deciduous forest, "Lake-Forest Archaic" in the transitional zone between the deciduous and boreal forest areas, and the

"Shield Archaic" in the boreal forest areas of the northeast. As with Paleoindian sites, Archaic sites are relatively small and ephemeral.

Woodland Tradition (2,800 B.P. to European Contact)

Throughout the Midwest, the Woodland Tradition is generally divided into three periods: Early, Middle and Late; however, Anfinson (1987) has suggested that a division into Initial and Terminal periods might be more appropriate in Minnesota. Archaeological research indicates that in many ways, life for communities during the Woodland Tradition remained similar to those of the Archaic period, with a dependence upon a diverse, seasonal resource base of plants and animals (Anfinson 1987:222; Johnson 1988). The transition to the Initial Woodland Tradition occurred when American Indians began manufacturing ceramic vessels, using bows and arrows, constructing earthen burial mounds, and cultivating and harvesting select plant species. The adoption of ceramics by the Woodland American Indians might have caused significant changes in many aspects of this culture, the foremost being subsistence strategies (Boszhardt et al. 1986:258) (Figure 3).

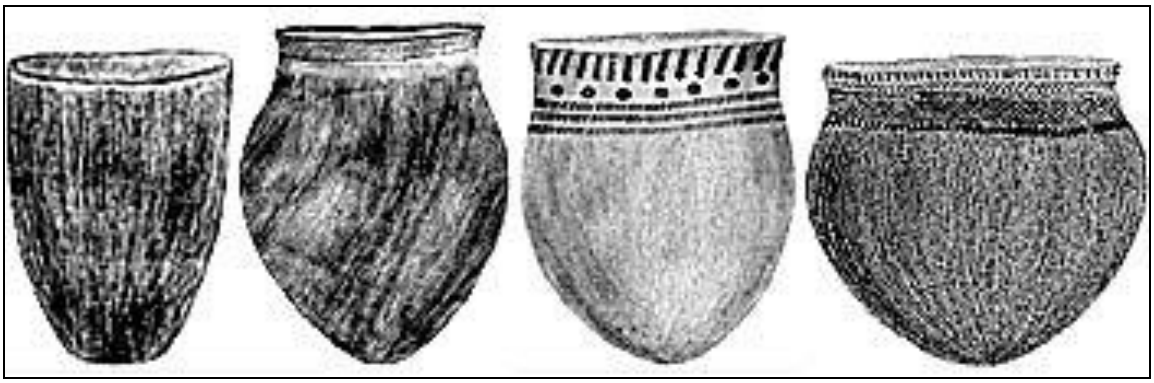

Figure 3. Woodland ceramic pots (MVAC n.d.).

Populations began to grow, marking the transition into the Late or Terminal Woodland period. Settlement patterns shift to larger, more permanent villages typically located near rivers. One possible reason for this is that toward the end of Woodland Period, American Indians became increasingly efficient in how they acquired food. The subsistence strategies of these people incorporated hunting and gathering with limited agriculture focusing on specific plants. Ceramic vessels differed from previous types in form and decoration. Woodland period communities were situated in locations that ranged from focusing on a specific resource to general environments capable of sustaining a large community for a long time.

Site types assigned to the Woodland Tradition throughout the region range from cemeteries and small, limited use sites to extensive village and habitation sites.

Contact/Postcontact Period (1630 to Present)

This period generally refers to the span of time extending from the first European explorations until intensive Euroamerican settlement of the region. Minnesota's historical period began in 1673 when French explorers Marquette and Joliet discovered the upper portion of the Mississippi River. Ten years later, Catholic Missionary Father Louis Hennepin returned to France to write the first book about Minnesota, *Description de la Louisiane*, telling his story of exploring Minnesota and of being held captive by the Dakota Indians (Figure 4).

Figure 4. Father Hennepin at St. Anthony Falls (Minnesota Historical Society 1903)

The territory containing modern-day Minnesota was claimed by Spain, France, Great Britain, and eventually the United States. Lieutenant Zebulon Montgomery Pike led the first United States expedition through Minnesota in 1805. Fort St. Anthony (later Ft. Snelling) was completed between 1819 and 1824, and in 1836, the Wisconsin Territory, including a portion of Minnesota, was formed. Minnesota became a territory in 1849 and achieved statehood on May 11, 1858. The fur trade drove much of the European exploration and settlement in Minnesota through the mid-1800s.

As white settlers came to Minnesota, the state's economy and numerous industries began developing. One of the earliest industries to peak in Minnesota was the lumber industry (Figure 5). The extensive white pine forests of northern Minnesota brought industrialists, capital, and settlers to the state. Lumbering peaked between 1899 and 1905 and eventually the loggers moved out of Minnesota as the forests were obliterated.

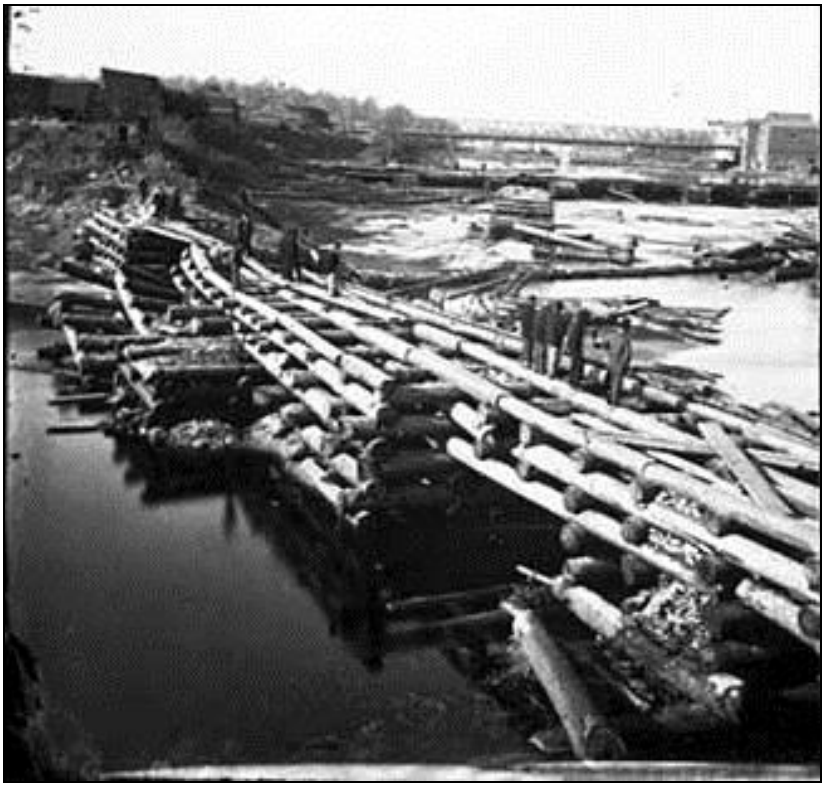

Figure 5. Logging at St. Anthony Falls (Minnesota Historical Society 1870).

Agriculture, specifically wheat farming, was also a key industry in Minnesota. The huge wheat farms in central western and southern Minnesota caused mills to spring up along waterways across the state. The most notable milling center was Minneapolis, which ultimately dominated the world in wheat and flour processing until the 1930s.

In addition to lumber and milling, Minnesota was also a leader in iron mining. Looking at the industries and economy of northeastern Minnesota today, one might have difficulty imagining the area prior to the iron ore industry. Mining and the iron industry created the towns, built the roads, and brought the people to the heavily wooded and remote northeastern Minnesota of the late 19th century. Iron ore shipments were sent from Michigan's Upper Peninsula nearly three decades earlier, but once the Minnesota iron lodes were discovered, the state quickly established a dominant position atop the iron ore production hierarchy.

Associated archaeological and historic site types categorized in the Contact/Postcontact Period include standing structures as well as archaeological sites.

Background Research

In the summer of 2014, *10,000 Lakes Archaeology* conducted a background research for the proposed project area to determine if the APE contained or is likely to contain archaeological sites (Gronhovd 2014). During the background research, *10,000 Lakes Archaeology* examined the Minnesota Archaeological Site Files, and the Minnesota Architectural History Site Files, and original land survey maps to determine if the proposed project might impact any archaeological sites.

This research revealed that six archaeological sites are recorded within approximately 1½ miles of the proposed project, four of which are within less than half a mile of the proposed project. During the background research, nine areas with moderate to high potential for unrecorded archaeological sites were also identified (Figure 6; Table 1). These locations were defined by considering many factors such as proximity to water, proximity to recorded archaeological sites, and topography. Archaeological sites are more likely to be found near water (including historic or precontact water bodies) and on prominent topographic features; however these are not the only locations archaeological sites could be located. Areas with low potential for archaeological sites include wetlands and areas with slopes over 20%. The areas with moderate to high potential for archaeological sites were surveyed as part of this project.

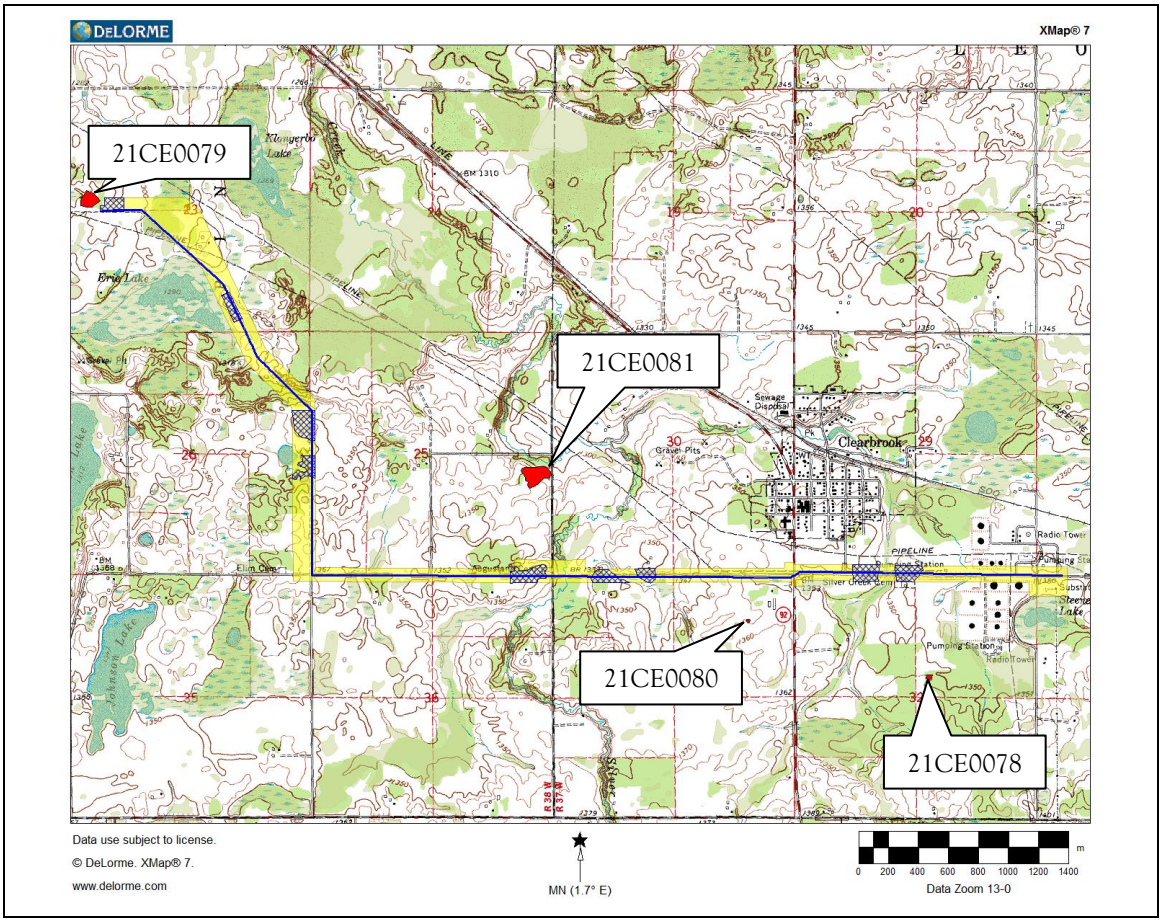

Figure 6. Survey areas (blue) and recorded archaeological sites (red) within ½-mile of the APE (yellow).

Table 1. Cultural resources located within 1½ miles of the proposed project area.

Site Type	State Site #	Location	Site description	Distance from Project Area
Historical Archaeology	21CE0031	T149N, R37W, Sec. 34	Ruins of an historic farmstead with silo and windmill	1½ miles
Precontact Archaeology	21CEq	T149N, R38W, Sec. 27	Precontact ceramics were found at this location in 1938. Site has not been verified by archaeologists.	1½ miles
Precontact Archaeology	21CE0078	T49N, R37W, Sec. 32	Single lithic	½ mile
Historical Archaeology	21CE0079	T149N, R38W, Sec. 23	Historic farmstead	Within APE
Precontact	21CE0080	T149N, R37W,	Single lithic tool	<1/4 mile

Archaeology		Sec. 31		
Historical Archaeology	21CE0081	T149N, R38W, Sec. 36	Historic site	½ mile

Archaeological Fieldwork

Methods

The Phase I archaeological survey consisted of primarily pedestrian surface survey supplemented by shovel testing. The surface survey occurred in areas where more than 25% of the ground surface was visible, and involved walking over the area in five to 15-meter intervals while examining the ground surface for archaeological materials or features.

In wooded and grass-covered areas where less than 25% of the ground surface was visible, shovel testing was conducted. Shovel testing involved the excavation of test pits that measured 30 to 40 centimeters in diameter and were placed at 15-meter intervals or intuitively, as appropriate. As the soil was removed, it was screened through ¼-inch mesh hardware cloth to determine if cultural materials were present. Survey areas were photographed and all shovel tests were mapped using a hand-held GPS unit. Field surveys were consistent with the methods set forth in the *SHPO Manual for Archeological Projects in Minnesota* (Anfinson 2005).

Results

The survey examined nine separate areas identified as having a moderate to high potential for unrecorded archaeological sites. Each parcel surveyed is discussed below, beginning at the southeastern end and moving to the northwestern end.

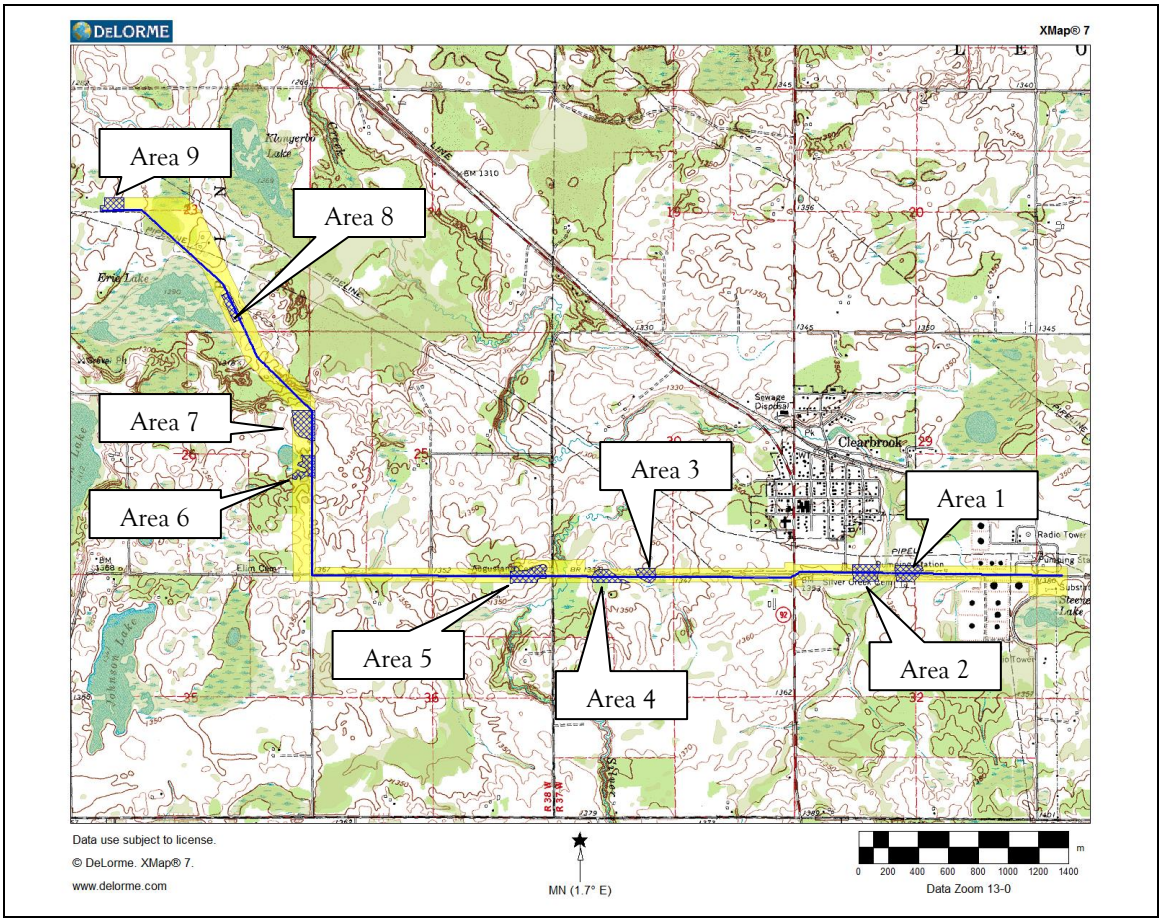

Figure 7. Survey areas (blue) and APE (yellow).

Areas 1 and 2

Areas 1 and 2 are located toward the eastern end of the proposed transmission line corridor, on the east and west sides of an intermittent/seasonal drainage (see Figure 7; Figure 8). The southern portion of Area 1 contains Silver Creek Cemetery (Figure 9). The earliest grave marker located in Silver Creek Cemetery dates to 1908, and the cemetery appears to remain in use.

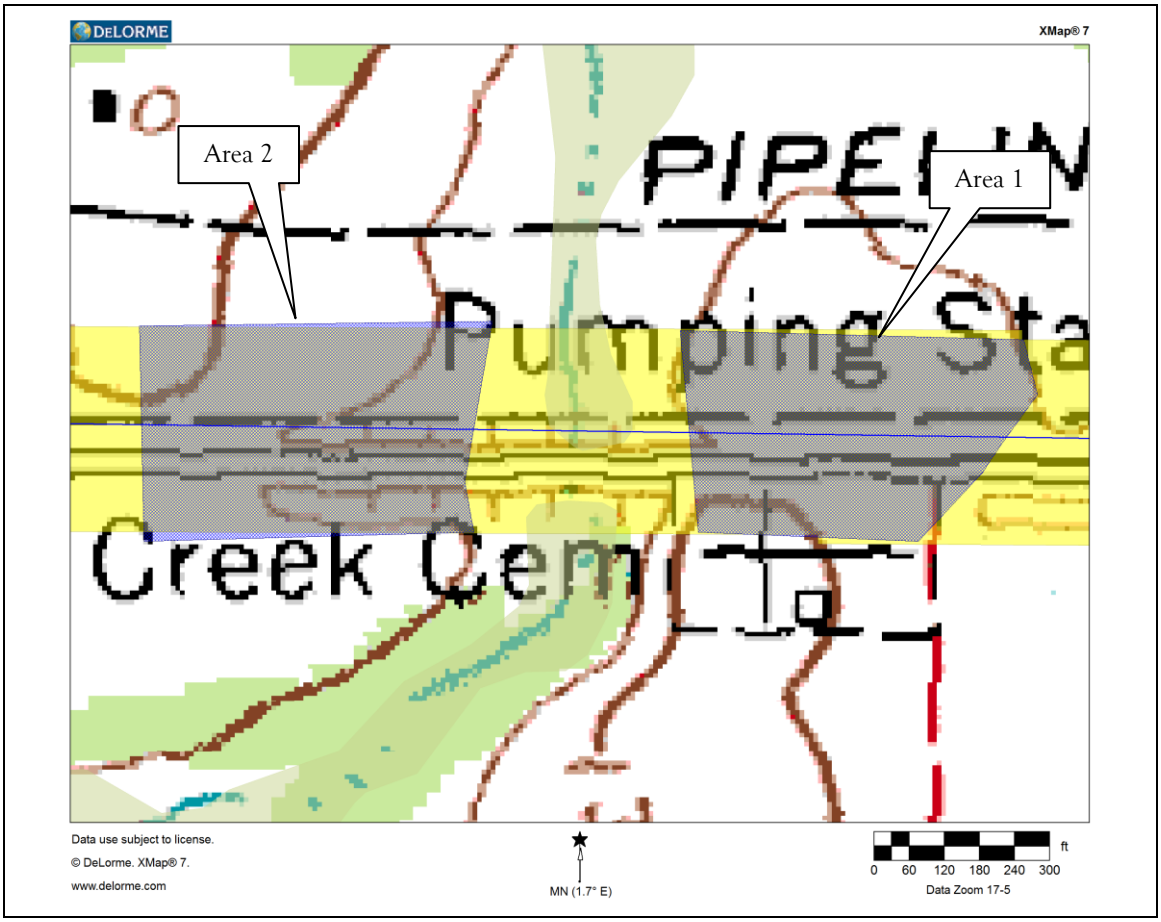

Figure 8. Survey Areas 1 and 2 showing APE (yellow) and survey areas (gray).

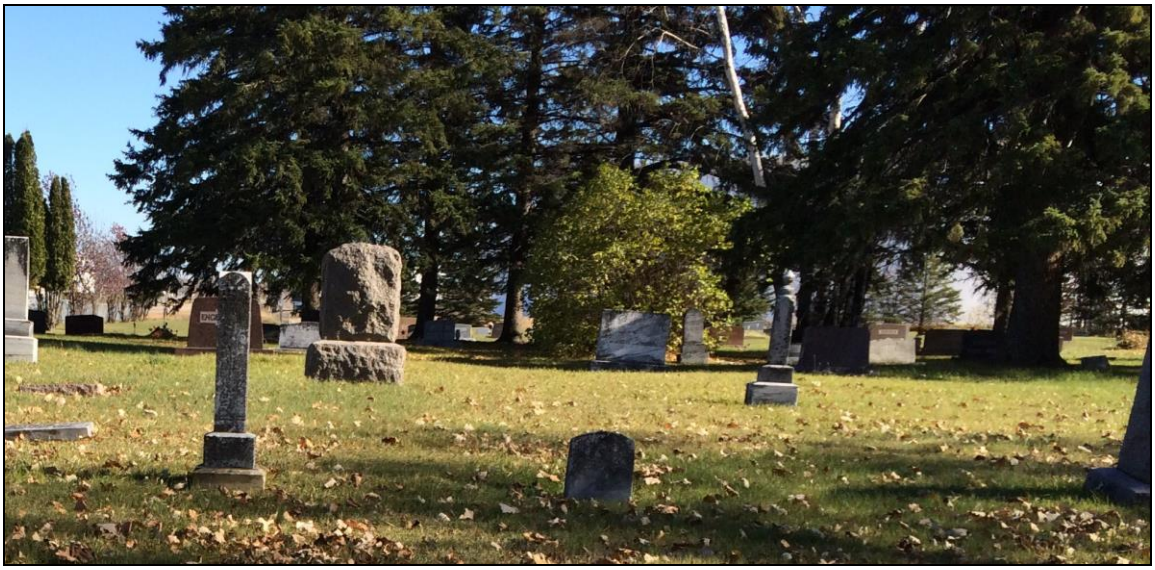

Figure 9. Silver Creek Cemetery in the southern portion of Area 1, looking east.

The northern portion of Area 1 and all of Area 2 consisted of plowed agricultural fields with excellent (>90%) surface visibility (Figure 10). These areas were pedestrian surface surveyed in 15-meter transects. No archaeological sites or features were identified during the survey of Areas 1 and 2.

Figure 10. Area 1, looking east.

Areas 3, 4, and 5

Areas 3, 4, and 5 are located southwest of Clearbrook, on three high spots between drainages (see Figure 7; Figure 11). Area 3 is located on the east side of an intermittent/seasonal drainage, with Area 4 on the west side of the seasonal drainage, and the east side of Silver Creek. Area 5 is located on the west side of Silver Creek.

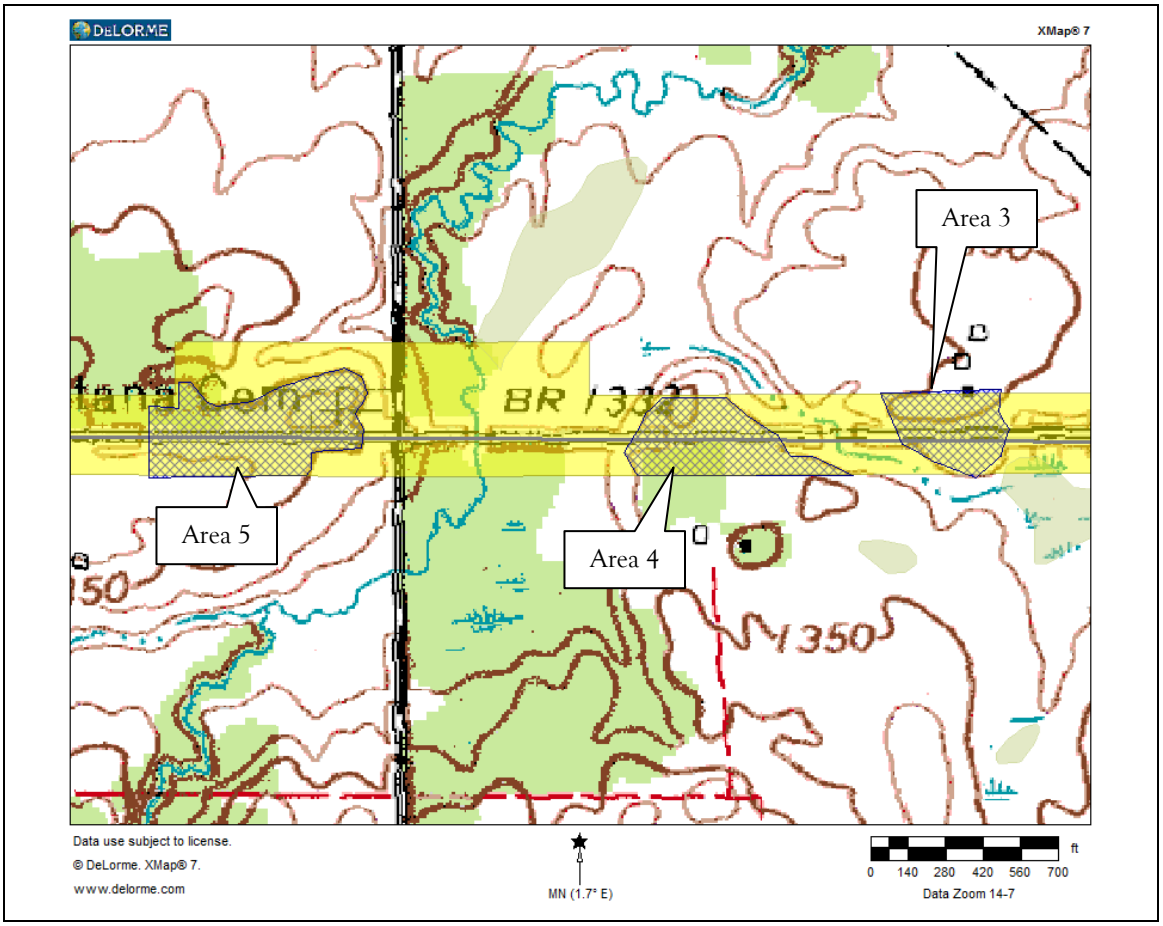

Figure 11. Areas 3, 4, and 5 showing APE (yellow) and survey areas (gray).

The south side of Area 3 consists of an alfalfa field, while the north side is a residential lawn. One shovel test was excavated on the south side of Area 3 in the alfalfa (Figure 12). The shovel test extended to a depth of 43 centimeters (cm) and consisted of approximately 20 cm of dark brown silt over very light brown silt.

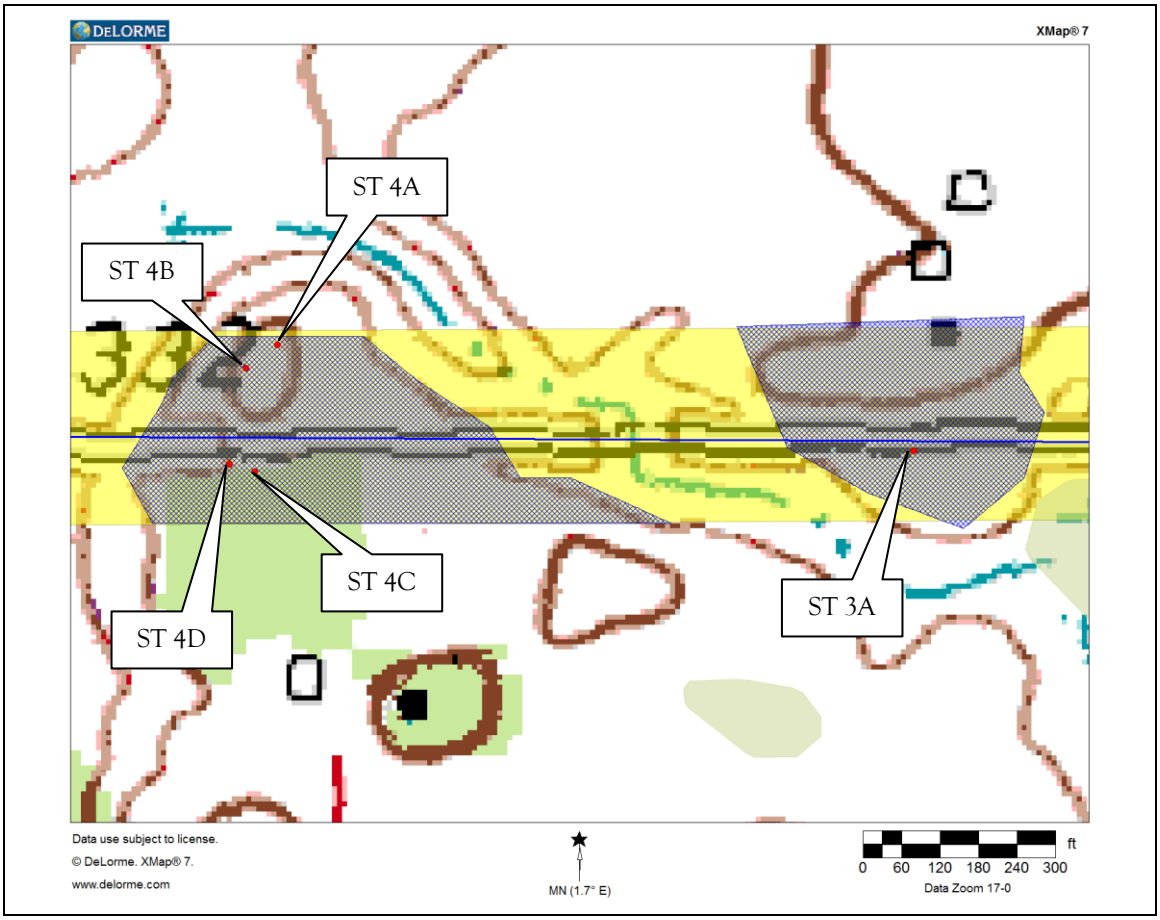

Figure 12. Areas 3 and 4 showing APE (yellow), survey areas (gray), and shovel test locations.

Area 4 was partially grass-covered and partially wooded. Four shovel tests were excavated in Area 4 (see Figure 12). Three of the four shovel tests consisted of 20-30 cm of very dark brown silt over 10-20 cm of brown silt, over compact dark yellowish brown silty clay. The top layer of soil appeared to have been scraped off the forth shovel test in Area 4, and consisted of approximately 20 cm of brown silt over dark yellowish brown silty clay.

The northeastern corner of Area 5 holds Augustana Cemetery, while the northwestern portion consisted of a cornfield, and the southern portion, an alfalfa field (Figure 13). The earliest grave marker in the cemetery dates to 1911, and the cemetery appears to remain in use. There also appear to be potentially unmarked graves along the eastern end of the cemetery, as evidenced by oblong depressions.

Figure 13. Cemetery in Area 5, looking west.

West of the cemetery was a cornfield (Figure 14). The corn had not been harvested, but offered good to very good (50-70%) surface visibility conditions. This portion of Area 5 was pedestrian surface surveyed in 15 meter transects.

Figure 14. Cornfield in Area 5, looking northwest.

The southern portion of Area 5 consisted of an alfalfa field with poor surface visibility (0-15%) (Figure 15). Three shovel tests were excavated in Area 5 and yielded 40 to 60 cm of compact dark grayish brown silt over yellowish brown clay—silt (Figure 16). No cultural materials or features were identified during the survey of Area 3, 4, or 5.

Figure 15. Alfalfa field in Area 5, looking southwest.

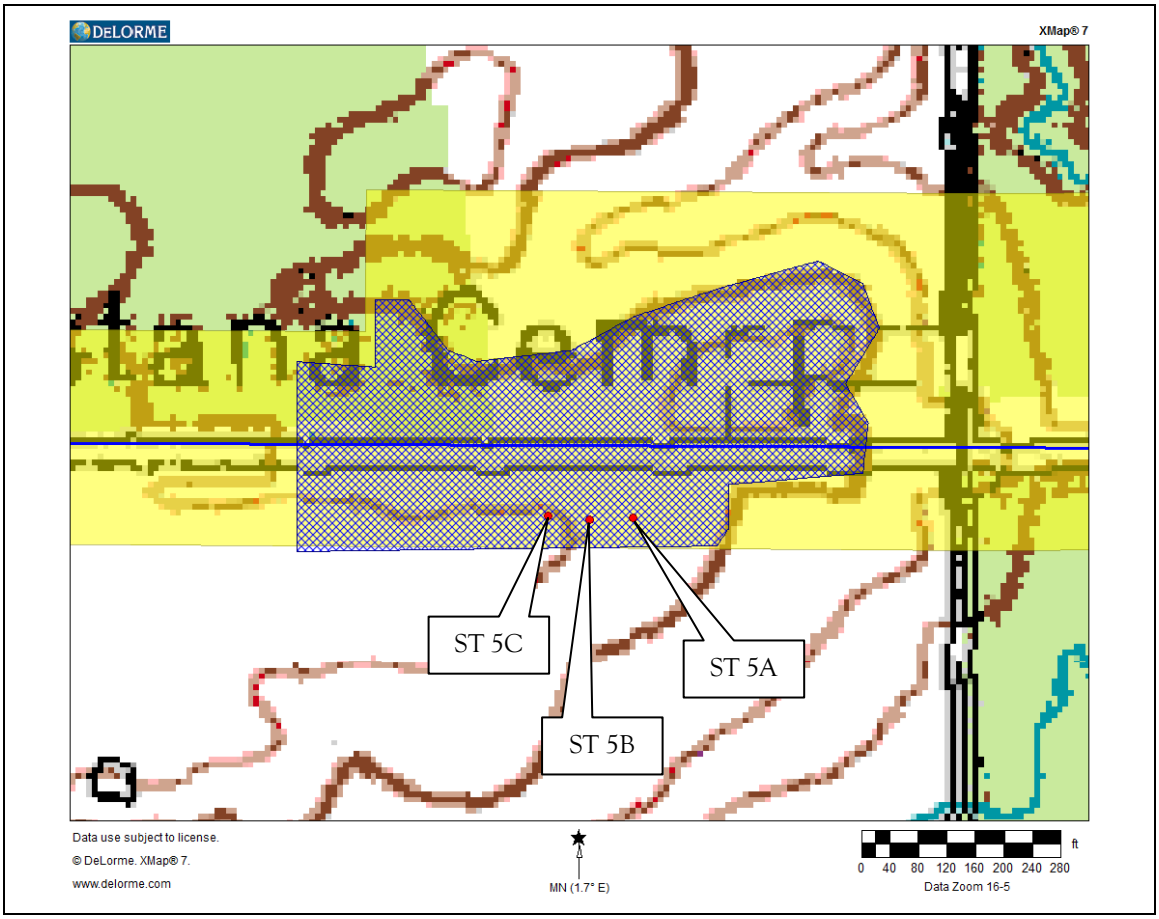

Figure 16. Area 5 showing shovel test locations.

Areas 6 and 7

Areas 6 and 7 are located west of Clearbrook, and overlook a wetland/lake area to the west (see Figure 7; Figure 17). Area 6 was primarily wooded with the far eastern edge consisting of a plowed agricultural field. The eastern portion of Area 6 was pedestrian surface surveyed in 15 meter intervals under excellent surface visibility conditions (>90%) (Figure 18).

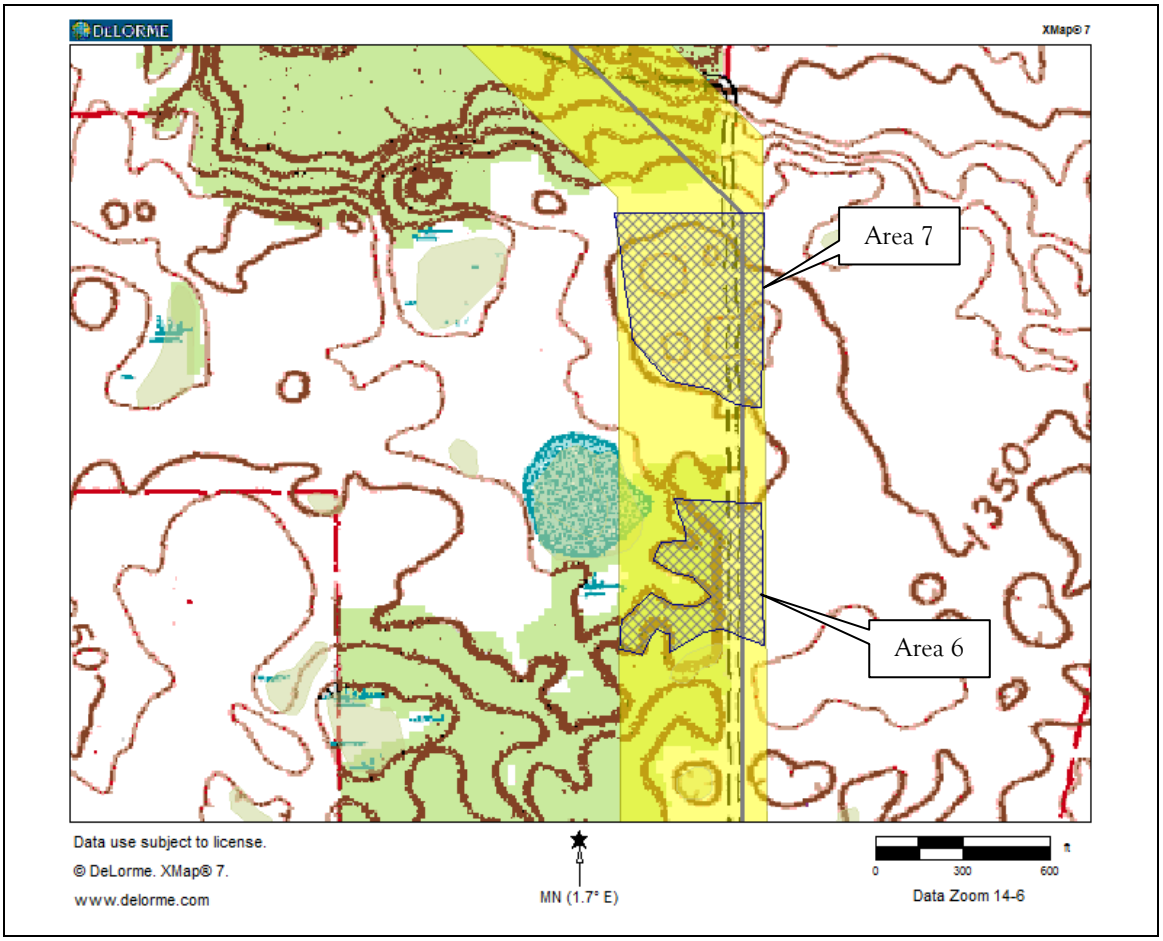

Figure 17. Areas 6 and 7 showing APE (yellow) and survey areas (gray).

Figure 18. Eastern portion of Area 6, looking northeast.

The western portion of Area 6 had poor surface visibility and thus six shovel tests were excavated (Figures 19 and 20). These tests were located along two small ridges adjacent to a wetland, and consisted of approximately 15 to 30 cm of dark brown silt, over approximately 20 cm of light brownish-gray silt, over dark yellowish brown sandy clay.

Figure 19. Area 6, looking west.

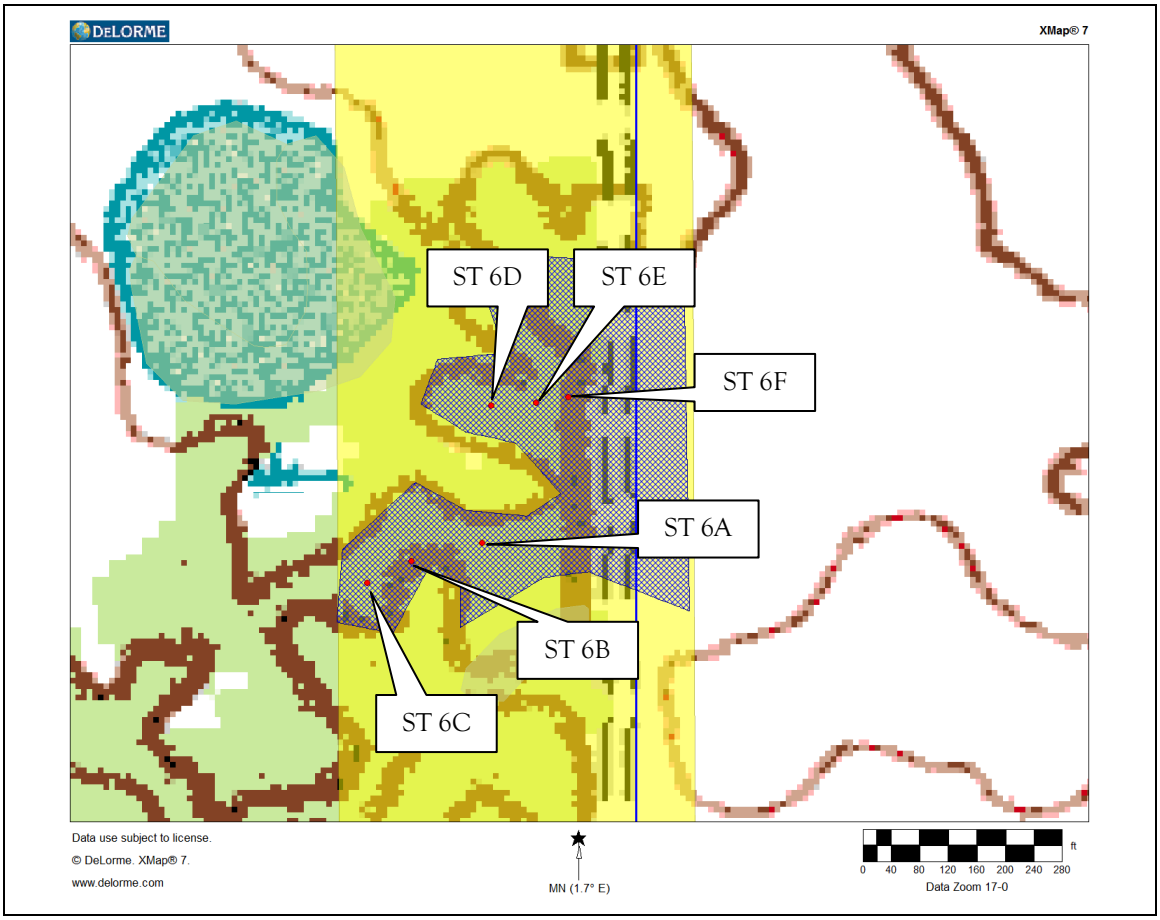

Figure 20. Area 6 showing shovel test locations.

Area 7 consists of a plowed agricultural field (see Figure 18). The area was pedestrian surface surveyed in 15 meter intervals under excellent surface visibility conditions (>90%). No cultural materials or features were identified during the survey of Areas 6 and 7.

Area 8

Area 8 is located on a small terrace overlooking a wetland and lake to the west (see Figure 7; Figures 21, 22, and 23). Area 8 consists of a pasture and had poor surface visibility (0-10%). Five shovel tests were excavated along the ridge (Figure 24). The tests consisted of approximately 20 cm of brown silty sand, over 20 cm of dark yellowish brown sand, over light brown sand. No cultural materials or features were identified during the survey of Area 8.

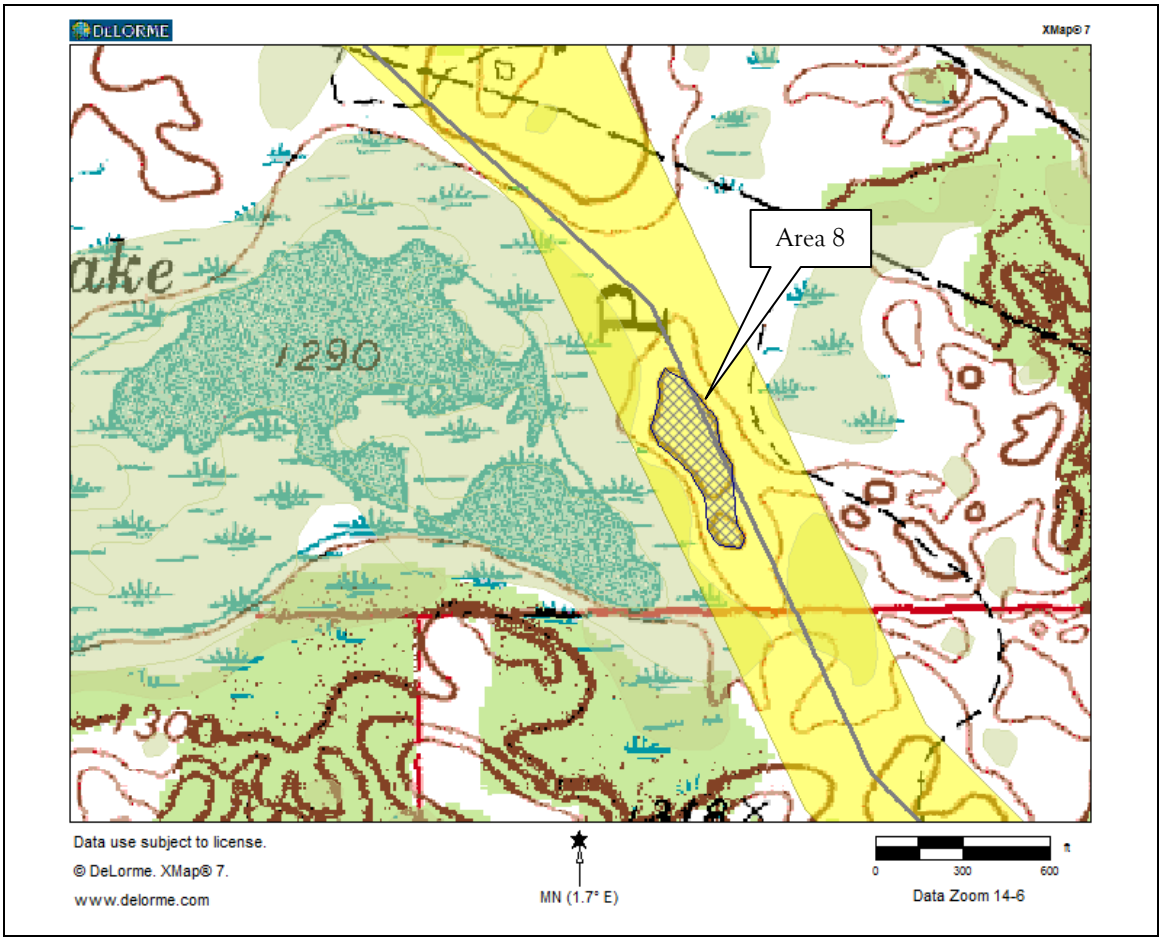

Figure 21. Area 8 showing APE (yellow) and survey areas (gray).

Figure 22.Photograph from Area 8, looking west.

Figure 23. Photograph of Area 8, looking west.

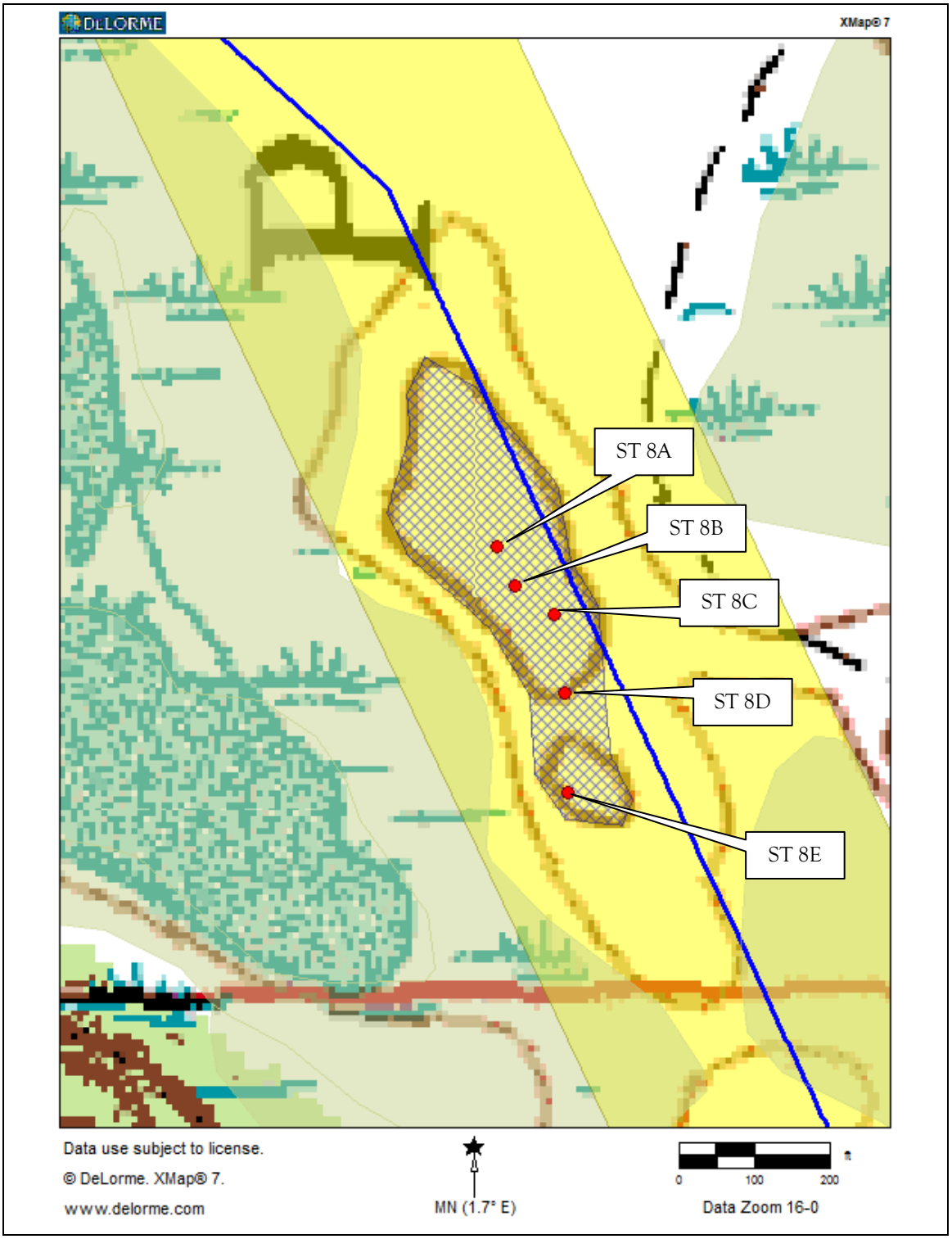

Figure 24. Area 8 showing shovel test locations.

Area 9

Area 9 is located on the far northwestern end of the project area, and is partially within recorded archaeological site 21CE0079 (Figure 25). A portion of the property within Area 9, was also considered outside the scope of this project (depicted in purple on the map) as that parcel is being examined separately.

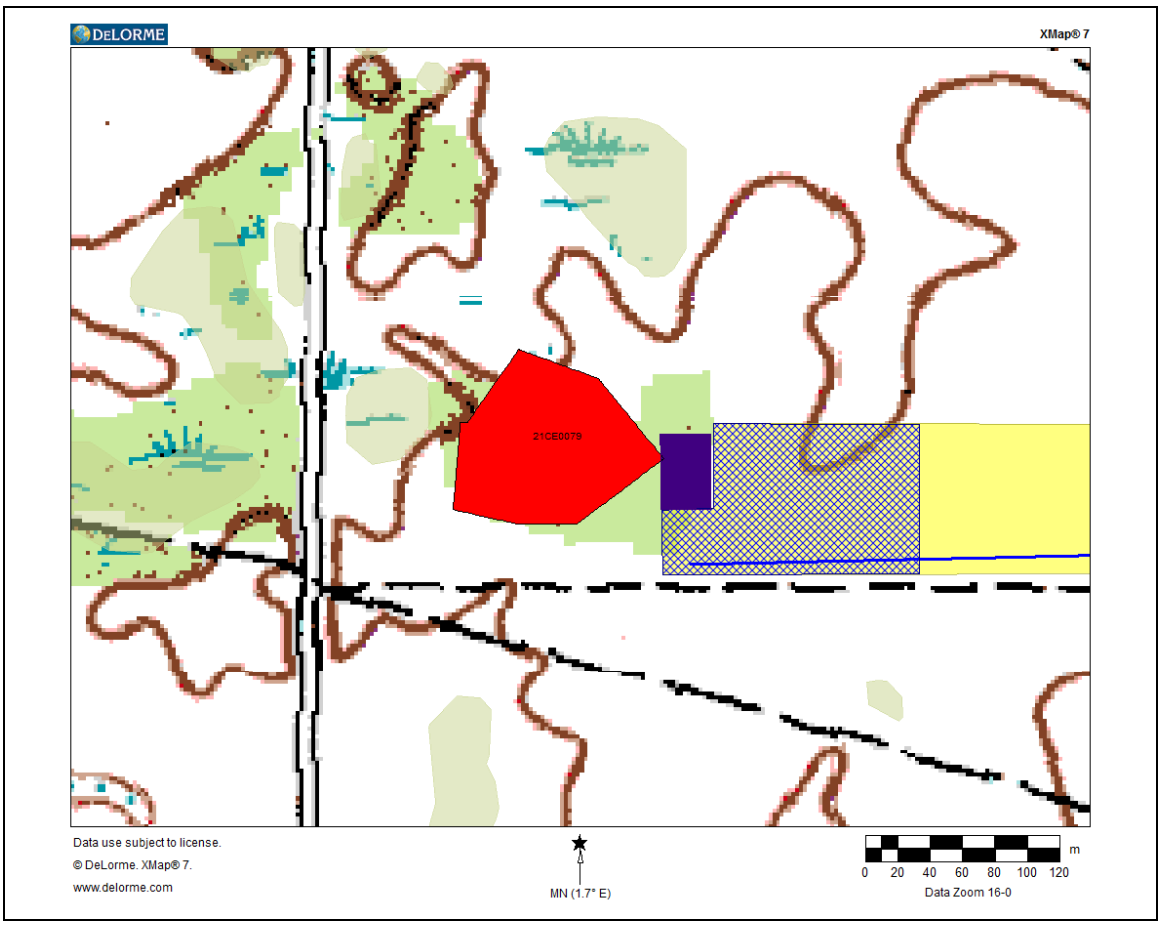

Figure 25. Area 9 showing location of archaeological site 21CE0079.

Site 21CE0079 consists of the remains of an historic farmstead (Figures 26, 27, and 28). The site was recorded in 2013 during which time archaeologists conducted a surface survey and shovel testing. The shovel tests were placed on a 15-meter (50 foot) grid across the site. It does not appear as though any of the features were specifically tested using shovel tests. The 2013 investigations resulted in a recommendation of *not eligible* for the National Register of Historic Places. The State Historic Preservation Office concurred with this recommendation in a letter dated September 4, 2014 (Appendix A).

Figure 26. Surface features at site 21CE0079, facing southeast.

Figure 27. Structural remains at site 21CE0079, facing east.

Figure 28. Structural remains at site 21CE0079, facing southeast.

Examination of this area for the current project, involved an intensive surface survey of the farmstead to determine if historic features relating to the farm might exist within the proposed project APE. Based on the survey of Area 9, the majority of the APE is outside the main historic farmyard, however, the previously recorded site boundaries (2013) excluded a portion of a foundation that appears to have been the barn (an integral part of the farm) (Figure 29). Thus, the site boundaries for 21CE0079 have been modified slightly, and do extend into the APE for the proposed project (Figure 30).

Figure 29. Remains of the possible barn foundation at site 21CE0079, facing southeast.

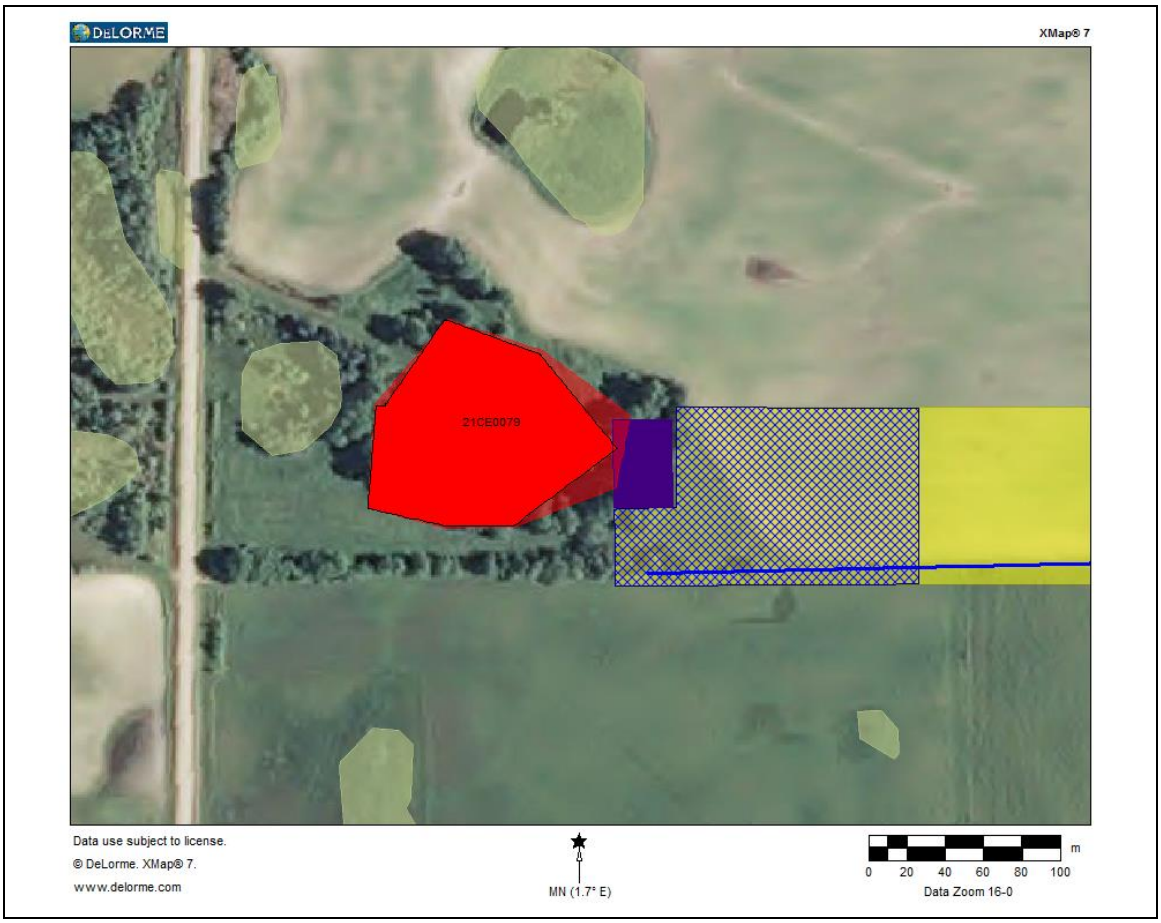

Figure 30. Map showing original (solid red) and revised (blended red) site 21CE0079 boundaries.

Recommendations

The Phase I archaeological survey of nine moderate and high potential areas within the proposed Clearbrook West transmission line APE resulted in the location of no previously unrecorded archaeological sites. Based on the results of the survey, *10,000 Lakes Archaeology* recommends that the project, as proposed, will not affect any archaeological resources. However, two cemeteries are within the APE. *10,000 Lakes Archaeology* recommends that these cemeteries be avoided*. The recorded site located within the proposed project area has been determined not eligible for the National Register of Historic Places, thus no additional work at the site is necessary.

** Minnesota Statute 307.08, the Private Cemeteries Act, prohibits the intentional disturbance of human burials.*

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Appendix A: Letter from the State Historic Preservation Office

Minnesota
Historical Society

Using the Power of History to Transform Lives
PRESERVING › SHARING › CONNECTING

STATE HISTORIC PRESERVATION OFFICE

September 4, 2014

Sara Ploetz
Enbridge
North Dakota Pipeline Company
1409 Hammond Avenue, Second Floor
Superior, WI 54880

RE: Sandpiper Pipeline Project
Cass, Kittson, Red Lake and St. Louis Counties
SHPO Number: 2013-1826

Dear Ms. Ploetz:

Thank you for the opportunity to comment on the above project. Information received in our office on 6 August 2014 has been reviewed pursuant to the responsibilities given to the Minnesota Historical Society by the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act.

As requested in your correspondence dated 5 August 2014, David Mather, SHPO National Register Archaeologist has completed a review of the *2013 Minnesota Archaeological Reconnaissance Studies* (April 2014) report as prepared by Commonwealth Cultural Resources Group and Merjent. His comments and recommendations are summarized below.

General Report Comments
Regarding the Phase I survey, the general approach seems appropriate. However, the report says that the survey protocol is described further in the Appendices, but we could not find this information. It appears from the survey maps that some areas identified as needing survey have not yet been surveyed. Your accompanying correspondence states that routing is still being determined, so we assume additional survey reports will be submitted as the routing is finalized and project review progresses. It will be important to somehow track these additional survey areas in relation to results we are reviewing now.

Specific Site Recommendations, by County:

Polk County

21PL91, 21PL106, 21PL103, 21PL104, 21PL93, 21PL99, 21PL95, 21PL94, 21PL101, CCRG603_CAC-03, 21PL100 – We agree that these sites are not eligible for listing in the National Register of Historic Places (NRHP).

21PL102 – Phase II evaluation was conducted at this site, with a recommendation that it is potentially eligible, pending a geomorphology study. We believe that the geomorphology study will be useful, but that the current data demonstrates that the site is eligible for listing in the NRHP.

21PL96/97 – Phase II evaluation recommends this site(s) as eligible for listing in the NRHP. We agree.

21PL105 – Phase I conducted with recommendation of Phase II evaluation needed. We agree.

21PL92 – Phase I conducted with recommendation of not eligible. We do not believe that the current data is sufficient to support this recommendation. A Phase II evaluation should be conducted to determine eligibility.

21PL98 – Phase II evaluation conducted with recommendation for additional Phase II. We agree that this would be helpful, but that the current data is sufficient to demonstrate it is eligible for listing in the NRHP.

Red Lake County

21**RL**31 (Note: Red Lake County is **RL** and not **RE**, please correct the references to this site in the report) We agree that this site is not eligible for listing in the NRHP.

Clearwater County

21CE79, 21CE81, 21CE80, 21CE78, CCRG04_MCT_06, 21CE75, 21CE77, 21CE66 – We agree that these sites are not eligible for listing in the NRHP.

21CE76 – Phase I conducted with recommendation of not eligible. We do not believe that the current data is sufficient to support this recommendation. A Phase II evaluation should be conducted to determine eligibility.

Hubbard County

21HB86, 21HB85 – We agree that these sites are not eligible for listing in the NRHP.

21HB81 – Phase I conducted with recommendation of not eligible. We do not believe that the current data is sufficient to support this recommendation. A Phase II evaluation should be conducted to determine eligibility.

21HB79 – Phase I conducted with recommendation of not eligible. We do not believe that the current data is sufficient to support this recommendation. A Phase II evaluation should be conducted to determine eligibility.

21HB82 – Phase I conducted with recommendation that Phase II evaluation is needed. We agree that this is necessary. It is disappointing, however, that there is so little information about the unusual artifacts observed at this site (daub fragments and charred botanical remains). It is surprising that the

artifacts were not collected, or at least photographed in the field. These are presumably fragile materials, and it seems likely that an opportunity has been lost. It's possible that they will still be there when/if the Phase II evaluation is conducted, but it will be a matter of luck if that's the case. This is an example that calls into question the appropriateness of no-collection archaeological surveys.

21HB84 – Phase I conducted with recommendation that Phase II evaluation is needed. We agree that this is necessary.

21HB89 – Phase I conducted with recommendation that Phase II evaluation is needed. We agree that this is necessary.

21HB87 – Phase I conducted with recommendation that the portion of the site within the survey corridor is apparently not eligible (?). We recommend that a Phase II evaluation be conducted at this site to determine eligibility.

21HB80 – Phase I conducted with recommendation that the portion of the site within the survey corridor is apparently not eligible (?). We recommend that a Phase II evaluation be conducted at this site to determine eligibility.

21HB88 – Phase I conducted with recommendation that Phase II evaluation is needed. We agree that this is necessary.

21HB83 – Phase I conducted with recommendation that Phase II evaluation is needed. We agree that this is necessary.

Cass County

CCRG01_CJY_02 – We agree that this site is not eligible for the NRHP.

21CA755 – Phase I conducted with recommendation that the site is not eligible. We agree, but consultation should occur with the Office of the State Archaeologist regarding potential need for burial authentication.

21CA736 – Phase I conducted with recommendation that Phase II evaluation is needed. We agree that this is necessary.

Aitkin County

21AK125, 21AK126 - We agree that these sites are not eligible for listing in the NRHP.

21AK127- Historic cemetery - Consultation with the Office of the State Archaeologist is needed.

Carlton County

21CL47, 21CL43, 21CL46 - We agree that these sites are not eligible for listing in the NRHP.

21CL42 – Phase I conducted with recommendation of not eligible. We do not believe that the current data is sufficient to support this recommendation. A Phase II evaluation should be conducted to determine eligibility.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36CFR800, Procedures of the Advisory Council on Historic Preservation for the protection of historic properties.

We look forward to continuing consultation with Enbridge and the Minnesota Public Utilities Commission, and also with the St. Paul District-U.S. Army Corps of Engineers, as this project's environmental review is completed.

Please feel free to contact me at 651-259-3456 or by e-mail at sarah.beimers@mnhs.org if you have any questions or concerns regarding our comments and recommendations.

Sincerely,

Sarah J. Beimers

Sarah J. Beimers, Manager
Government Programs and Compliance

cc: Scott Elk, Minnesota Public Utilities Commission
Brad Johnson, USACE, Regulatory Branch
Michael Madsen, Merjent