

## 3.2 Environmental Context

Barr reviewed Chapters 3 and 8 of the *MnModel, Phase 3*, prepared by the Minnesota Department of Transportation (MnDOT), for information pertaining to the Project Area's physiography, climate, and flora and fauna (Gibbon et al. 2002; Hobbs et al. 2002). The *MnModel Phase 3* indicates that the Project Area is located in the Northern Bog Archaeological Region (Region 7) (Gibbon et al. 2002). Following the Ecological Classification System utilized in *MnModel Phase* 3, the Project Area is further located within the Aspen Parklands subsection of the Lake Agassiz, Aspen Parklands Section (Gibbon et al. 2002; Hobbs et al. 2002).

The Aspen Parklands subsection is characterized by a low, level plain and extensive wetlands. It consists of glacial lake plain with topography that is level and low relief (Gibbon et al. 2002). Poorly drained soils are also present throughout, and there are few lakes in this subsection. The Aspen Parklands subsection represents the lake plain of Glacial Lake Agassiz. The Project Area is located in a water-worked till plain that has low relief due to wave action of Glacial Lake Agassiz (MN DNR 2022). Presettlement vegetation consisted of "aspen savanna, tallgrass prairie, wet prairie, and dry gravel prairie" (MN DNR 2022). Floodplain forests were also present along streams and rivers.

The climate of this region ranges from the mid-70s Fahrenheit in the summer to the mid- to low teens in the winter (Gibbon et al. 2002). The growing season is less than 120 days per year, and the region's average annual precipitation is between 20 and 26 inches (Gibbon et al. 2002).

Flora and fauna within the region would have historically included deer, moose, caribou, beaver, and black bear in the uplands and fish in Red Lake, Lake of the Woods, and the major rivers. Waterfowl would have also been seasonally abundant. Wild rice was also present, though not in abundance as with other regions further south (Gibbon et al. 2002).

### 3.2.1 Precontact Site Suitability

A review of the *MnModel Phase 4*, prepared by the MnDOT and available for reference through the OSA portal, indicates that portions of the Project Area have a low probability of containing prehistoric archaeological deposits. However, the majority of the Project Area is located in an area of unknown site potential, due to a lack of previous archaeological survey data in the region.

According to *MnModel Phase 4* as referenced through the OSA portal, the Project Area consisted mainly of prairie, with small areas of "permanently wet", "seasonally wet", "deciduous forest", and "deciduous woodland" interspersed throughout. Prehistoric hydrography indicates the majority of the Project Area consisted of wetland. Wet, low-relief areas would not have been conducive for prehistoric occupation, though they would have provided seasonal food sources.

### 3.2.2 Soils

The Project Area contains small pockets of Kratka fine sandy loam, loamy till substratum and Kratka and Strathcona soils. However, the majority of the Project Area is located within the Smiley soil series. The Kratka series consists of "very deep poorly and very poorly drained soils that formed in a mantle of sandy

glacial lacustrine or outwash sediments over lacustrine sediments or loamy glacial till on glacial lake plains, glacial deltas of former glacial lakes, stream terraces, and moraines" (USDA 2009). The Smiley series consists of "very deep, poorly and very poorly drained soils formed in loamy glacial till on lake plains, till plains and moraines" (USDA 2015). Soils within the Project Area are depicted in Table 3-3 and Figure 3-3.

#### Table 3-1Soil Units in the Project Area

Soil Type	Soil Characteristics	Drainage Type	Hydric
137A	Kratka and Strathcona soils, 0 to 1% slopes	moderately well and somewhat poorly drained (Strathcona series) to poorly and very poorly drained (Kratka series)	All hydric (100%)
138A	Kratka fine sandy loam, loamy till substratum, 0 to 1% slopes	poorly and very poorly drained	Predominantly hydric (67% to 99%)
159A	Smiley loam, 0 to 1% slopes	poorly and very poorly drained	Predominantly hydric (67% to 99%)



### 3.3 Cultural Contexts

The following summaries provide a context through which to examine the cultural history of the Project Area. These contexts are based on information found in *Archaeology of Minnesota: The Prehistory of the Upper Mississippi River Region.* (Gibbon 2012), a series of statewide historic contexts developed by the Minnesota SHPO (Dobbs 1990a; Dobbs 1990b; SHPO 1993), as well as available Euroamerican county and state histories (Blegen 1963; Boughton Jr. 1929; Brunt 1922;).

### 3.3.1 Precontact Cultural Setting

The Project Area is located in a portion of Red Lake County with a low probability for long-term precontact settlement. Nevertheless, Red Lake County is located in a region containing aspen savanna, tallgrass prairie, wet prairie, dry gravel prairie, and floodplain forests along streams and rivers. These habitats would have provided abundant plants and animals for seasonal subsistence throughout history. Archaeological sites are not well documented in Red Lake County, with only 58 sites currently recorded (MDA State Archaeologist 2022a). Of these, 42 are precontact in nature (MDA State Archaeologist 2022a). The precontact occupation of northern Minnesota has been divided into three taxonomic periods, based on the material culture present at a site and the subsistence patterns interpreted from the artifact assemblage (Gibbon 2012). These are defined by geographic region in Minnesota and include Paleoindian, Archaic, and Woodland. Sites identified in Red Lake County represent only some of these occupational periods; however, the majority of the documented precontact sites do not contain diagnostic artifacts and therefore cannot be attributed to specific cultural occupations.

The Paleoindian period encompasses the cultural remains of the earliest recorded occupations in the region. Paleoindian sites date to early postglacial times, after 12,000 BP (years Before Present). Paleoindian sites are generally identified through the presence of fluted projectile points, a characteristic artifact type for the Paleoindian period. Although Paleoindian projectile points are some of the most widely distributed types across North America, they are underrepresented in Minnesota (Gibbon 2012). In Red Lake County, no Paleoindian sites have been documented (MDA State Archaeologist 2022a).

The Archaic period is identified by archaeologists as the timespan when more localized seasonal settlement and subsistence patterns replaced the broad seasonal migration patterns of the Paleoindian period. In Minnesota, the beginning of the Archaic period coincides with a warmer, drier postglacial environment. Spruce forests retreated north with the glaciers, and melting glacial ice formed large lakes and rivers. As a result, Archaic period subsistence included more aquatic resources, such as fish and shellfish, as well as smaller game and the foraging of wild plants (Gibbon et al. 2002). In Red Lake County, no Archaic sites have been documented (MDA State Archaeologist 2022a).

The innovation of ceramic technology and the emergence of burial mounds generally define the transition to the Woodland period. Woodland period sites are often identifiable through recovered pottery sherds, in addition to stylistic projectile points. In Red Lake County, five Woodland period sites have been documented (MDA State Archaeologist 2022a).

The remaining 15 recorded sites in Red Lake County are historic in nature, including one historic-period Native American site and one multicomponent site. There is also one site documented in Red Lake County from an unknown time period (MDA State Archaeologist 2022a).

### 3.3.2 Native American Cultural Setting

The Project is located on land that was home to the Dakota and the Ojibwe, although other tribes were likely present as well (Fleming et al. 2018). Minnesota is the Dakota homeland. The confluence of the Minnesota River with the Mississippi River is known as *Bdote* in Dakota – "the point of origin and a center point for spirituality for Dakota people" (Fleming et al. 2018: p. 57).

Prior to Euroamerican settlement, the Dakota were plentiful and prosperous in Minnesota. As Euroamerican settlers expanded into these states, the Dakota were subjected to war and disease. Following the Dakota War in 1862, the Dakota underwent forced removal (MDA State Archaeologist 2022b).

The Ojibwe arrived in Minnesota hundreds of years ago, following a migration along the Great Lakes from the Atlantic Coast. They were led by a prophecy to go to "the land where food grows on water" and settled in the Mississippi Headwaters region in the mid-eighteenth century (Benton-Banai 1988). Between 1805 and 1867, a series of treaties between the federal government and tribes including the Dakota, Ojibwe, Ho-Chunk, Menominee, Sac, and Fox resulted in the opening of Minnesota to Euroamerican settlement (Minnesota Indian Affairs Council et al. 2011).

The Project Area is located within the boundaries of the 1863 Ceded Territory. The 1863 treaty, known also as the "Old Crossing treaty", was a culmination of U.S. efforts that began in 1851 with the goal of obtaining the land in the Red River Valley (Minnesota Indian Affairs Council et al. nd). The Old Crossing Treaty was presented as an agreement to allow businesses to travel through Ojibwe territory. However, as written, the treaty actually ceded 11,000,000 acres in present-day Minnesota and North Dakota to the United States. The treaty included a 20-year annuity payment of \$20,000 to the Ojibwe while at the same time providing up to \$100,000 for "Indian traders" who worked in the territory (Minnesota Indian Affairs Council et al. nd). Before ratifying the 1863 treaty the U.S. Senate made significant changes to it, such that several Ojibwe signers refused to endorse it. In 1864 an Ojibwe delegation went to Washington to negotiate a new treaty, which resulted in increased annuity payments for the ceded territory (Minnesota Indian Affairs Council et al. nd).

While the following narrative focuses on historic Euroamerican activities within present-day Minnesota, it is important to acknowledge that Native American nations played a vital role in Minnesota's history and continue to influence its culture today. Nations including the Dakota, Ojibwe, and others have demonstrated resilience and resistance in the face of concerted efforts to remove them from their land and culture. Despite these attempts at removal, many native peoples continued to return to their homeland. We acknowledge the circumstances that led to the forced removal of Native American tribal members in Minnesota and honor their history and resilience.

### 3.3.3 Historic Cultural Setting

At the end of the American Revolution, the U.S. acquired all of the land east of the Mississippi River in the Second Treaty of Paris (Blegen 1963). This acquisition included the north-central, northeast, and east-central portions of Minnesota. In 1803, the United States acquired the majority of what was to become Minnesota from France as part of the Louisiana Purchase (Blegen 1963). After spending most of the first half of the nineteenth century changing hands between Spain, France, and the U.S., the region was formed into the Minnesota Territory in 1849. Nine years later it became the thirty-second state (Blegen 1963).

#### 3.3.3.1 Statehood

As Minnesota entered the Union in 1858, tensions between the North and South were coming to a head over the issue of slavery. When the Civil War started in 1861, Minnesota largely supported the Union, and provided approximately 22,000 troops to the war effort (Blegen 1963). By the second year of the war, Minnesota was facing its own war: the Dakota War (Blegen 1963). The war was a result of growing tensions between the Dakota and the U.S. government over violations of the Treaty of Traverse des Sioux and the Treaty of Mendota, as well as unacceptable payments by Indian agents. Due to an impasse over negotiations, a Dakota hunting party attacked and killed five white settlers, leading to the attack of settlements throughout the Minnesota River valley (Blegen 1963). These battles continued for several months, until most of the Dakota were captured. Eventually, 38 Dakota were hanged, the largest one-day execution in U.S. history (Blegen 1963). By April of 1863, the remaining Dakota in the region were expelled to South Dakota and Nebraska (Blegen 1963).

After the Civil War, thousands of Americans came to Minnesota to take advantage of the state's cheap and fertile land (Brunt 1922). Largely due to advertisements by the railroad industry, the state's population quickly tripled (Brunt 1922). Many of these new settlers came to the area to farm and cut timber, becoming the backbone of the state's early economy (Brunt 1922). To further economic success, local Grange chapters were established (Brunt 1922). The organization had great political influence on important farming matters, and also provided education on new farming methods.

By the end of the nineteenth century, Minnesota's industrial development began to take shape (Clark 1989). The state became one of the first to develop hydroelectric power with the building of a hydroelectric power plant in Saint Anthony Falls. The discovery of iron in the Mesabi Range and the Vermilion Range near Lake Superior in the 1880s established Minnesota's iron mining industry (Clark 1989).

### 3.3.3.2 Red Lake County

Red Lake County formed in 1896 from a portion of Polk County. Its boundaries continued to change until 1910, when Pennington County was formed from what had been the northern half of Red Lake County (Boughton Jr. 1929). Red Lake County is located in the heart of the Red River Valley and known for its fertile soil. The confluence of Red Lake River and Clearwater River is located within the county, at present-day Red Lake Falls (Boughton Jr. 1929). A French trading post was established at the confluence of these two rivers in 1798 (MHN 2008). The first Euroamerican settlers arrived in the county in 1876, when 119 French Canadian families were brought to the area by Pierre Bottineau (MHN 2008). Scandinavian and German immigrant farmers began to settle the county in the 1880s and 1890s (Boughton Jr. 1929).

Lumber was the major economy of Red Lake County until 1911, when it was replaced by farming (MNH 2008). Small tract farming gave way to large grain farms, and as a result milling operations became a staple operation in the early twentieth century, particularly in Red Lake Falls (MNH 2008).

At the time of its organization in 1896, the Northern Pacific and the Great Northern railroads traversed Red Lake County. In 1904 the Minneapolis, St. Paul and Sault Ste. Marie Railroad, also known as the Soo Line, was built through the county, which resulted in the establishment of two new towns: Oklee and Plummer (Healy and Kankel 1976).

#### 3.3.3.3 Emardville Township

Emardville Township is named after Pierre Emard, who held the first organizational town board meeting at his home on July 18, 1883 (Healy and Kankel 1976). This board meeting resulted in the election of townspeople to oversee the building of roads and bridges. Between 1887 and 1889 male members of Emardville Township were expected to volunteer time annually to help build roads throughout the township (Healy and Kankel 1976). In 1884, the town board organized school districts within the county, resulting in the creation of six separate districts. In 1911, Emardville Township grew in size, when 12 sections of land from Wyandotte Township were added to Emardville after the creation of Pennington County (Healy and Kankel 1976). The 2016-2020 American Community Survey, published by the U.S. Census Bureau, indicates that the population of Emardville Township, which has a total area of approximately 45 square miles, is 229<sup>2</sup>.

#### Plummer, MN

The Town of Plummer formed following construction of the Soo Rail Line through Red Lake County, and is located off U.S. Highway 59, adjacent to the Soo Line (Boughton Jr. 1929). The Clearwater River travels just west of the town, which is named after C.A. Plummer, the first storekeeper in the town (Healy and Kankel 1976). Plummer was incorporated in 1906. Major enterprises within the town included the Thief River Falls Milling Company, which owned a large elevator in the town and the Emardville Creamery Association, who moved their creamery to the west side of the Clearwater River. The Soo Line Railroad also built a branch line from Plummer to Duluth in 1910, to support heavy lumbering activity in the area (Healy and Kankel 1976). The 2016-2020 American Community Survey indicates that the population of Plummer, Minnesota is 333<sup>3</sup>.

### 3.4 Summary and Discussion

This section presents the results of the cultural resources background research. The literature review indicates that one archaeological site and no historic architectural resources are located within the 1.6 km (1 mi) study area.

 <sup>&</sup>lt;sup>2</sup> Data retrieved from the 2020 ACS 5-year Estimates Subject Table, Selected Characteristics of the Total and Native Populations, Table ID: S0601. <u>https://data.census.gov/cedsci/</u>
<sup>3</sup> Ibid.

The predictive model for precontact archaeological sites developed by the MnDOT suggests that the Project Area has low potential to contain precontact resources. A review of available historic maps and aerials indicates that the Project Area also has low potential to contain historic archaeological resources.

# 4 Methods

This section describes the regulations and guidelines governing archaeological fieldwork as well as the research design, field methods, and laboratory methods employed during the Phase I survey. The objective of the Phase I survey was to identify cultural resources that may be affected by the Project.

### 4.1 Applicable Regulations and Guidelines

The Project requires a Site Permit from the Minnesota PUC pursuant to the Minnesota Power Plant Siting Act (Minnesota Statutes, chapter 216E) and Minnesota Rules, chapter 7850 for proposed projects meeting the definition of "large electric power generating plants" and "high voltage transmission lines". Minnesota Rules 7850.1900, Subpart 3 requires that an applicant for a Site Permit include "a description of the effects of the facility on archaeological and historic resources"<sup>4</sup>.

The Project is also subject to the Minnesota Historic Sites Act (MS 138.661-138.669), which requires that state agencies consult with the SHPO before undertaking or licensing projects that may affect properties on the State or National Registers of Historic Places.

Under the Minnesota Private Cemeteries Act (MS 307.08), if human remains are encountered during construction, construction at that location must be halted immediately and local law enforcement and the OSA must be contacted. Construction cannot proceed at that location until authorized by local law enforcement and the OSA.

### 4.2 Research Design

Barr based the research design on the results of the background research and in consideration of the requirements for archaeological and historic resources pursuant to the Minnesota Rules 7850.1900, Subpart 3. Barr's methodology, therefore, was designed to complete a cultural resources survey of the additional Project Area to determine whether the Project will affect archaeological resources, historic resources, or resources significant to Native American tribes.

### 4.3 Field Methods

Barr conducted the archaeological fieldwork using methods consistent with Minnesota SHPO guidelines (Anfinson 2005). The Project Area consists of recently tilled agricultural fields with excellent ground surface visibility; therefore, a systematic pedestrian survey was completed in transects spaced at 15-meter intervals.

When artifacts were identified, the crew collected and bagged artifacts by individual provenience, recorded relevant information such as soils and depth of deposits (when applicable), mapped features with a Global Positioning System (GPS), and took photographs.

<sup>&</sup>lt;sup>4</sup> 7850.1900 - MN Rules Part

The TCRS consisted of a pedestrian walkover survey completed in transects spaced at 15-meter intervals by members of the Leech Lake Band of Ojibwe and other tribally affiliated individuals. The goal of the TCRS was to identify and document Tribal cultural resource locations including cultural corridors, known archaeological sites, cemeteries, water resources, seasonal activity sites and other places or items of cultural and religious significance. Relevant information was documented through photographs, measurements, and recorded with a GPS receiver.

The archaeological reconnaissance and TCRS was a collaborative effort between DDCRM and Barr.

### 4.4 Laboratory Methods

Archaeological material identified in the field was collected by DDCRM for cleaning, analyzing, and cataloging according to their methodology.

# **5** Results

Barr and DDCRM conducted the archaeological field work on October 25, 2022, and May 23, 2023. Weather was moderate, with temperatures ranging from the low-50 degrees Fahrenheit in October 2022 to warm, with temperatures in the mid-60 degrees Fahrenheit in May 2023. The Project Area consisted of recently plowed agricultural fields with ground surface visibility near 100 percent (Plate 1, Plate 2). The northern-most parcel was surveyed on October 25, 2022. Crops were still standing in the southern-most parcel during the October mobilization; therefore, Barr returned to the Project Area on May 23, 2023, and completed a pedestrian survey of the southern-most parcel, which had been recently tilled. Photographs of the field investigation are included in Appendix B. Results of the TCRS are presented in a separate report prepared by DDCRM (Appendix C).



Plate 1. Project Area Overview, Northern-most Parcel (October 2022)

Plate 2. Project Area Overview, Southernmost Parcel (May 2023)

As a result of the archaeological investigation, two new archaeological sites were identified Further discussion is included below.

### 5.1 Site 21RL0041

Site 21RL0041 consists of an omarolluk erratic that appears to have been utilized as a groundstone artifact. The site was identified during pedestrian survey of an agricultural field with near 100 percent ground surface visibility (Plate 3).

#### Site 21RL0041 is located

The site consists of a single, potential groundstone artifact. The soil on which the site is located is Smiley loam, 0 to 1% slopes (159A). One shovel test probe was excavated adjacent to the artifact. It contained an Ap/B/C soil profile with the following characteristics: 0-20cmbs: black (10YR 2/1) sandy loam, 20-40cm: very dark grayish brown (10YR 3/2) sandy loam with brown (10YR 5/3) mottles, 40-50cmbs: light olive brown (2.5Y 5/3) sandy loam (Plate 4).



Plate 3. Overview, site 21RL0041, looking north



Plate 4. Shovel Test, site 21RL0041

The artifact was collected by DDCRM for post-field analysis; therefore, Barr's analysis focused on what could be determined during fieldwork. The artifact measures approximately 9cm in diameter, and appears to consist of a hand-held mortar (Plate 5, Plate 6). Discussions with the Minnesota Office of the State Archaeologist (OSA) indicate that the artifact could represent an omar or omarolluk erratic. Barr archaeologists and DDCRM employees examined the artifact in the field and concluded that although the artifact could be natural in origin, it appears to have been utilized by precontact peoples. Therefore, an archaeological site record was submitted to the OSA, and the object documented as site 21RL0041.





Plate 5. Recovered artifact, 21RL0041

Plate 6. Recovered artifact, 21RL0041

Upon identification of the artifact, Barr and DDCRM conducted a systematic pedestrian survey at 2-meter intervals in the area surrounding the artifact. No additional cultural resources were identified. The artifact comprising site 21RL0041 is located adjacent to a small, linear topographic depression that may represent the location of a drainage tile in the agricultural field **Control**. The artifact comprising site 21RL0041 was collected by DDCRM for additional analysis.

Site 21RL0041 is an isolated artifact that may represent an episode of accidental discard.

Site 21RL0041 cannot currently be directly associated with any significant persons or events in the region, nor does it appear to offer information important to the prehistory of the region. Site 21RL0041, as it is currently defined, is recommended not eligible for the NRHP and no further archaeological work is recommended.

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### 5.2 Site 21RL0042

Site 21RL0042 consists of an omarolluk erratic that may have been utilized as a groundstone artifact. The site was identified during pedestrian survey at the edge of an agricultural field with near 100 percent ground surface visibility (Plate 7).

#### Site 21RL0042 is located

The site consists of a single, potential groundstone artifact. The soil on which the site is located is Smiley loam, 0 to 1% slopes (159A). One shovel test probe was excavated adjacent to the artifact. It contained the following soil profile: 0-60cmbs: yellowish brown (10YR 5/4) silt loam (Plate 8).



Plate 7. Overview, site 21RL0042, looking north



Plate 8. Shovel Test, site 21RL0042

The artifact was collected by DDCRM for post-field analysis; therefore, Barr's analysis focused on what could be determined during fieldwork. The artifact measures approximately 10cm by 4cm, appeared to consist of a granitic material, and contained two cupules on opposite sides of the rock (Plate 9, Plate 10). Discussions with the Minnesota Office of the State Archaeologist (OSA) indicate that the artifact could represent an omar or omarolluk erratic. Barr archaeologists and DDCRM employees examined the artifact in the field and concluded that although the artifact could be natural in origin, it may also have been utilized by precontact peoples as a nutting stone or fire-starter. Therefore, an archaeological sire record was submitted to the OSA, and the object documented as site 21RL0042.





Plate 9. Recovered artifact, 21RL0042

Plate 10. Recovered artifact, 21RL0042

Upon identification of the artifact, Barr and DDCRM conducted a systematic pedestrian survey at 2-meter intervals in the area surrounding the artifact. No additional cultural resources were identified. The artifact comprising site 21RL0042 is located on a slight topographic rise adjacent to a county ditch (Figure 5-3). The artifact comprising site 21RL0042 was collected by DDCRM for additional analysis.

Site 21RL0042 is an isolated artifact that may represent an episode of accidental discard.

Site 21RL0042 cannot currently be directly associated with any significant persons or events in the region, nor does it appear to offer information important to the prehistory of the region. Site 21RL0042, as it is currently defined, is recommended not eligible for the NRHP and no further archaeological work is recommended.

# 6 Conclusions and Recommendations

Enbridge is proposing to develop a 130 MWac solar facility (Project) adjacent to their existing Plummer Station, southeast of Plummer, Minnesota. Barr, at the request of Enbridge, conducted a supplemental Phase I for the Project when two new parcels were added to the Project Area. This work was completed to ensure that no significant cultural resources would be impacted as a result of the Project.

### 6.1 Project Overview

The additional parcels measure approximately 164 acres and are located on land primarily used for agriculture.

Background research conducted in April 2022 and supplemented in October 2022 focused on the additional Project Area. The background research determined that the Project Area has not been previously surveyed for cultural resources.

Barr and DDCRM conducted the Phase I and TCRS fieldwork on October 25, 2022, and Barr returned on May 23, 2023. The goal of this survey was to identify cultural resources that may be affected by Project activities within the two added Project parcels.

### 6.2 Summary of Results and Recommendations

As a result of the Phase I investigation, two new archaeological sites were recorded. Sites 21RL0041 and 21RL0042 are each an isolate artifact consisting of a groundstone tool that may have been natural in origin but utilized by precontact peoples. DDCRM also indicated that these two new precontact sites, in addition to other known precontact sites within 1-mile of the new Project Area, demonstrate an extended history of Tribal cultural use of the area.

The TCRS also determined that numerous trees, plants, and wildlife traditionally and currently used by tribes for food, medicine, arts, ceremony and/or materials are present within the new Project Area. Additionally, delineated wetlands interspersed with cropland in the new Project Area provide the type of habitat for food and other natural resources that are traditionally and currently used by tribes ancestral to this area.

The sites, as isolated artifacts, do not have the potential to yield important information about the past and are recommended not eligible for the NRHP. Barr recommends that no further archaeological work be required for the Project to proceed as planned. These determinations and recommendations are based on the current Project design. If during the course of construction the Project boundaries should change, additional work may be required.

DDCRM recommends that Enbridge continue to consult with Tribal Resource Managers to ensure protection of irreplaceable cultural/natural resources for future generations. Additionally, DDCRM recommends that Tribal Monitors be present for any future Project-related ground disturbing activities.

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Appendices

Appendix A

Historic Maps and Aerials

Appendix A Historic Maps and Aerials



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Appendix B

Photographs Documenting the Phase I

Appendix B Photographs Documenting the Phase I



Photo 1: Project Area Overview: northern parcel, looking north.



Photo 2: Project Area Overview: northern parcel, looking northwest.



Photo 3: Project Area Overview: northern parcel, looking south.



Photo 4: Example Project Area ground surface visibility, northern parcel.





**PROJECT PHOTOGRAPHS** 



Photo 5: Project Area Overview: southern parcel, looking north.



Photo 7: Project Area Overview: southern parcel, looking south.



Photo 6: Project Area Overview: southern parcel, looking south.



Photo 8: Overview: Example Project Area ground surface visibility, southern parcel.



Plummer — Solar Enbridge Energy, L.P.

**PROJECT PHOTOGRAPHS** 

# Appendix C

# **Tribal Cultural Resources Report**

Appendix C Tribal Cultural Resources Report

# A Tribal Cultural Resource Survey of the Proposed Enbridge Plummer Solar Project - Addendum 1: Eastern Parcels

130 Megawatt Enbridge Plummer Solar Project Red Lake County, Minnesota



Prepared for: Barr Engineering Co. Principal Investigator, Veronica A. Parsell

Submitted by: Dirt Divers Cultural Resource Management LLC, December 2023

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### **1** Executive Summary

Enbridge Energy, Limited Partnership (Enbridge) commissioned Dirt Divers Cultural Resource Management LLC (DDCRM) to conduct a Tribal Cultural Resource Survey (TCR Survey) and Barr Engineering Co (Barr) to conduct a Phase I Archaeological Survey for two additional eastern parcels added to the proposed Enbridge Plummer solar development (Project). The Project lies within the 1863 Ceded Territory, within six miles west of the 1889 Ceded Territory with the Red Lake Band. The Project is adjacent to Enbridge's existing pump station, southeast of Plummer in Emardville Township, Red Lake County, Minnesota. The Project encompasses an area measuring approximately 164 acres (Project Area) on land primarily used for agriculture.

In 2022, DDCRM and Barr completed a combined TCR Survey and Phase I archaeological reconnaissance of the proposed Enbridge Plummer solar development for an initial main area measuring 854 acres. The TCR Survey and Phase I Archaeological Survey of the current Project follows the combined surveys conducted in 2022.

The current TCR Survey was completed for the Project Area concurrent with a Phase I Archaeological Survey completed by Barr. In October through November 2022, DDCRM conducted the TCR Survey in conjunction with Barr's Phase I for the northern parcel in the Project Area. In May 2023, DDCRM and Barr completed surveys for the southern parcel in the Project Area. Key personnel of the TCR Survey crew included Ojibwe band members of the Leech Lake Band and other tribally affiliated individuals.

DDCRM conducted the TCR Survey of the Project Area to identify cultural resources important to Tribal communities. Cultural resources identified included trees, plants and wildlife traditionally and currently used for food, medicine, arts, ceremony and/or materials. The delineated wetlands interspersed with cropland in the Project Area provide the type of habitat for food and other natural resources that are traditionally and currently used by Tribes ancestral to this area.

During the TCR Survey and concurrent Phase I, two new archaeological sites were found within the Project Area identified as precontact ground stone materials. Barr recommended that the new archaeological sites, as currently defined, are not eligible for the National Register of Historic Places (NRHP). Background research within three miles of the Project Area identified twelve archaeological sites, ten of which are precontact sites. Although not eligible for the NRHP, the new precontact sites in combination with known precontact sites demonstrate an extended history of Tribal cultural use in the area.

The construction and installation of solar facilities involves ground-disturbing activities that have the potential to disturb cultural sites. Based on the findings of the investigations, DDCRM recommends that Enbridge continue to consult with Tribal Resource Managers to ensure protection of irreplaceable cultural/natural resources for future generations. Additionally, DDCRM recommends that Tribal Monitors be present for any Project future ground disturbing activities.

### 2 Introduction

Enbridge Energy, Limited Partnership (Enbridge) commissioned Dirt Divers Cultural Resource Management LLC (DDCRM) to conduct a Tribal Cultural Resource Survey (TCR Survey) and Barr Engineering Co (Barr) to conduct a Phase I Archaeological Survey for two additional eastern parcels added to the proposed Enbridge Plummer solar development (Project). The Project lies within the 1863 Ceded Territory, within six miles west of the 1889 Ceded Territory. The Project is adjacent to Enbridge's existing pump station, southeast of Plummer in Emardville Township, Red Lake County, Minnesota. The Project encompasses an area measuring approximately 164 acres (Project Area) on land primarily used for agriculture.

In 2022, DDCRM and Barr completed a combined TCR Survey and Phase I archaeological reconnaissance of the proposed Enbridge Plummer solar development for an initial main area measuring 854 acres. The TCR Survey and Phase I Archaeological Survey of the current Project follows the combined surveys conducted in 2022. The Enbridge Land Control Area for the proposed Plummer solar development is represented in Figure 1.

The current TCR Survey was completed for the Project Area concurrent with a Phase I Archaeological Survey completed by Barr. In October through November 2022, DDCRM conducted the TCR Survey in conjunction with Barr's Phase I for the northern parcel in the Project Area. In May 2023, DDCRM and Barr completed surveys for the southern parcel in the Project Area. Key personnel of the TCR Survey crew included Ojibwe band members of the Leech Lake Band and other tribally affiliated individuals.

DDCRM conducted the TCR Survey of the Project Area to identify cultural resources important to Tribal communities. Cultural resources identified included trees, plants and wildlife traditionally and currently used for food, medicine, arts, ceremony and/or materials. The delineated wetlands interspersed with cropland in the Project Area provide the type of habitat for food and other natural resources that are traditionally and currently used by Tribes ancestral to this area.

### 2.1 Project Location

The Project Area is within the 1863 Ceded Territory, within six miles west of the 1889 Ceded Territory, southeast of Plummer, Minnesota and encompasses two parcels of land measuring 164 acres (Figure 1). Additional locational information is provided in Table 1.

#### Table 1: Project location information

Parcel Number	Ceded Territory	State	County	Township Name	Township	Range	Section
02-0335-000	1863	MN	Red Lake	Emardville	151N	42W	12
(northern parcel)							
02-0339-000	1863	MN	Red Lake	Emardville	151N	42W	13
(southern parcel)							

#### Figure 1: Overview of Project location



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TCR Survey of the Proposed Enbridge Plummer Solar Project—Addendum 1 Page - 6

### 2.2 Personnel

The TCR Survey and concurrent Phase I Archaeological Survey was a collaborative effort between DDCRM personnel and Barr.

#### 2.3 Curation

The archaeological artifacts found during the field surveys were collected by DDCRM for cleaning, analyzing, and cataloging. In October 2023 all artifacts found were returned to the landowner. All additional records (field notebooks, GPS data, photographs) will be organized and stored long-term by DDCRM.

### 3 Research Design and Methods

### 3.1 Objectives

The TCR Survey sought to identify and document Tribal cultural resources including cultural corridors, known archaeological sites, cemeteries, water resources, seasonal activity sites and other places of cultural and religious significance to Tribal communities within, immediately adjacent, and/or surrounding the Project Area.

#### 3.2 Methodology

The TCR Survey consisted primarily of a pedestrian walkover survey. The TCR Survey was conducted by DDCRM and Barr using a maximum survey interval of fifteen meters. Documentation methods included taking photographs, measurements, and collecting locations with a GPS receiver. When artifacts were found, they were collected and bagged, soils and depth of deposits were recorded, photographs were taken, and locations were mapped with a GPS.

#### 3.3 Background Research

A literature search was conducted to identify recorded cultural resources within three miles of the Project Area. Historic and environmental contexts were also considered when evaluating the potential for cultural sites. Sources consulted for this research included, but are not limited to, the following.

- The Minnesota Office of the State Archaeologist (OSA) archaeological site files
- The State Historic Preservation Office (SHPO) historic site files
- The National Register of Historic Places (NRHP)
- United States General Land Office (GLO) survey maps and notes
- Trygg composite maps
- Modern and historic aerial photographs
- Regional historical overviews
- Previous archaeological survey reports

Further, the TCR Survey benefited from the deep knowledge of local history and contemporary land use held by DDCRM staff members and crew. This diverse first-hand knowledge was invaluable in identifying locations of significance to members of the Leech Lake Band of Ojibwe and other Tribal communities such as Red Lake Nation.

#### 3.3.1 Cultural Corridor

The Project lies within the 1863 Ceded Territory, within six miles west of 1889 Ceded Territory. The Project is in Red Lake County, which is partially within the fertile Red River Valley—a place of paramount importance to the heritage and continuing traditions of the Ojibwe and Dakota nations.

Minnesota became the 32<sup>nd</sup> U.S. state on May 11, 1858. Within six years thereafter, on the western side of Red Lake County, the making and signing of the Old Crossing Treaty occurred October 2, 1863, at the "Old Crossing" of the Red Lake River, near present day Huot, Minnesota. This location was a resting place along the Woods Trail, which was an eastern branch of the Red River Trails, used by the Red River ox carts. From 1844 to the 1870s, thousands of ox carts crossed at the Old Crossing while hauling goods between St. Paul, Minnesota and the Red River colony in Winnipeg, Manitoba, Canada (Gilman, et al. 1979).

By 1863, business interests had been focused on the fertile Red River Valley for more than a decade. The Old Crossing Treaty was presented by United States treaty negotiators as an agreement to allow businesses to travel through Ojibwe territory. The treaty as written, however, ceded eleven million acres of some of the most fertile land in the world, in present-day Minnesota and North Dakota to the United States. In exchange, the Ojibwe were to receive \$20,000 per year for 20 years and "Indian traders" would receive up to \$100,000. In addition, "each male adult half-breed or mixed-blood...who has adopted the habits and customs of civilized life, and who is a citizen of the United States" would receive a 160-acre homestead, benefitting traders who had married into Ojibwe families.

Before ratifying the 1863 treaty, the U.S. Senate made amendments which several Ojibwe signers refused to endorse. In 1864, a delegation travelled to Washington to negotiate, which increased annuity payments for the ceded territory. In subsequent actions, the Red Lake Ojibwe ceded nearly three million additional acres. Their remaining land comprises the Red Lake Reservation, held in common by Red Lake band members today <u>1863 & 1864: Treaties with the Chippewa Red Lake & Pembina Bands (treatiesmatter.org)</u>.



Figure 2: Territory affected by the Old Crossing Treaty

Clara NiiSka, compiled from maps in "Indian Land Cessions in the United States," edited by Charles P. Royce (*Treaty of* <u>Old Crossing - Wikipedia)</u>

At the turn of the century the townsite of Plummer, Minnesota was located west of the Clearwater River Dam. In 1904 the Soo Ste. Marie Railroad (Soo Line) built through Emardville Township of Red Lake County and a town soon grew close to the railroad east of Plummer. In 1910, due to heavy lumbering in the area, the Soo Line Railroad built a branch line from Plummer to Duluth (Healy and Kankel, 1976). The current Project is within a mile north of the railroad and the southern edge of the Enbridge Land Control Area borders the railroad (Figure 1).

During the logging era, intensive logging took place along the Clearwater and Red Lake Rivers. As timberlands adjacent to navigable waterways were depleted, railroads were constructed to move logs to the mills. Thousands of miles of logging railroads were built across the northern part of Minnesota to access pine stands and to move logs to sawmills, rivers, and railroads. The logging railroads were used until the timber was exhausted, then they were typically abandoned, and the tracks removed (Peterson). Through time, increasing problems presented that were related to deforestation, destruction of valuable waterways and pollution of ceded lands. The massive

stripping of great forests was devastating to Indigenous Peoples and interfered with their ability to relate to the land and its inhabitants in ways that are culturally recognizable. Major sources of nutrition and wealth—native plants and trees used for medicine, food and materials were obliterated <u>Minnesota Chippewa Tribe (mnchippewatribe.org)</u>.

### 3.3.2 Geologic Setting

Red Lake County contains moraines and outwash deposits associated with the Des Moines lobe of the Wisconsin glaciation. This includes the Erskine moraine association which is generally clayey because of reworked lake sediment, lake-modified till, sand, and gravel.

Soils include the Smiley series, which consist of very deep, poorly, and very poorly drained soils formed in loamy glacial till on lake plains, till plains and moraines. The Kratka series consists of very deep and poorly drained soils that formed in a mantle of sandy glacial lacustrine or outwash sediments over lacustrine sediments or loamy glacial till on glacial lake plains, glacial deltas of former glacial lakes, stream terraces, and moraines. The highest potential for prehistoric cultural properties is along high ground within 1,000 feet of lakes, streams, and wetlands.

#### 3.3.3 Historic Cemeteries

One historic cemetery was identified within three miles of the Project Area (Table 2

#### Table 2: Historic cemeteries within three miles of the Project Area

Cemetery ID	Cemetery Name	Distance	Township	Range	Section	Township Name
82309	Finnish Cemetery	2,455' @ 270°	151N	42W	12	Emardville

#### 3.3.4 Archaeological Sites

The Minnesota archaeological site database maintained by the Office of the State Archaeologist (OSA) lists twelve archaeological sites within approximately three miles of the Project Area. Of these, ten are precontact sites which demonstrate an extended history of Tribal cultural use in the area (Table 3

Site #	Distance from Project Area	Distance from Enbridge Land Control Area	PLSS	Cultural/Temporal Affiliation	NRHP Eligibility
21RL0041	In Project Area	In Project Area	T151N, R42W, Section 12	Isolated precontact ground stone mortar (9500 BC-1650 AD)	Not Eligible
21RL0042	In Project Area	In Project Area	T151N, R42W, Section 12	Isolated precontact ground stone mortar (9500 BC-1650 AD)	Not Eligible
21RL0033	2,260' @ 270°	In Enbridge Land Control Area	T151N, R42W, Section 14	Indeterminate post contact artifact scatter (1837-1945)	Not Eligible
21RL0035	5,200' @ 177°	4,180' @ 157°	T151N, R42W, Section 24	Isolated precontact debitage flake (9500 BC-1650 AD)	Undetermined
21RL0036	1.17 miles @ 270°	650' @ 14°	T151N, R42W, Section 10	Indeterminate post contact artifact scatter & cellar depressions (1837-1945)	Undetermined
21RL0032	1.60 miles @ 270°	1,880' @ 354°	T151N, R42W, Section 10	Isolated precontact debitage flake (9500 BC-1650 AD)	Undetermined
21RL0008	2.66 miles @ 283°	1.51 miles @ 317°	T151N, R42W, Section 9	Precontact artifact scatter (9500 BC-1650 AD)	Not Eligible
21RL0040	2.96 miles @ 282°	1.74 miles @ 310°	T151N, R42W, Section 9	Precontact lithic scatter (9500 BC-1650 AD). Post contact artifact scatter, Railroads & Agricultural Development (1870- 1940)	Not Eligible
21RL0039	3.00 miles @ 284°	1.82 miles @ 313°	T151N, R42W, Section 4	Precontact artifact scatter (9500 BC-1650 AD)	Not Eligible
21RL0037	3.04 miles @ 285°	1.88 miles @ 313°	T151N, R42W, Section 4	Isolated precontact debitage flake (9500 BC-1650 AD)	Undetermined
21RL0038	3.10 miles @ 284°	1.53 miles @ 277°	T151N, R42W, Section 8	Precontact artifact scatter, Archaic. Indeterminate Post Contact artifact scatter (1837- 1945)	Undetermined
21RL0025		2.51 miles @ 330°	T151N, R42W, Section 19	Isolated precontact flake (9500 BC-1650 AD)	Undetermined

#### Table 3: Known archaeological sites within three miles of the Project Area



#### 3.3.5 Historic Map

Trygg composite maps represent a unique compendium of 46 maps of the United States Land Surveyors' plats and field notes with land features as noted at the time of the original General Land Office (GLO) surveys from approximately 1832-1907. The Trygg composite Minnesota map #20 illustrates the Project Area as prairie and marsh in the 1876 and 1891 surveys. There is a small settlement along the Clear Water River that is noted on Trygg map #20 within two miles to the northeast of the Project at the time of the GLO surveys. A portion of the boundary between the 1863 and 1889 ceded territories is also represented on Trygg map #20 (Figure 4).



Figure 4: Portion of Trygg Map Sheet #20 (© 1967 J. Wm. Trygg, Ely, MN)

Portion of Minnesota Sheet #20, Composite Map of the United States Land Surveyors' Original Plats and Field Notes © 1967 J. Wm. Trygg used with permission from Trygg Land Office, P.O. Box 628, Ely, Minnesota (<u>Trygg Historical Maps of Minnesota, Wisconsin, Michigan, Iowa</u>).

## 4 Field Results

The TCR Survey, in conjunction with Barr's Phase I, included a pedestrian walkover survey using a maximum survey interval of fifteen meters. In October through November 2022, the northern parcel was surveyed. At the time of the survey, row crops were still standing in the southern parcel. As a result, DDCRM and Barr returned to the Project Area in May 2023 to complete a pedestrian survey of the southern parcel after the crops had been tilled.

### 4.1 Trees, Plants and Wildlife

Vegetation throughout the Project Area was mostly agricultural (planted soybean and corn fields) with some field delineated wetlands interspersed with cropland.

The Minnesota Department of Natural Resources (DNR) and the U.S. Forest Service developed an ecological landscape classification in Minnesota. The Project Area lies within the Aspen Parklands subsection that is part of the low, level lake plain of Glacial Lake Agassiz, with extensive forested peatlands to the east and tallgrass prairie to the west. Pre-settlement vegetation consisted of aspen savanna, tallgrass prairie, wet prairie, and dry gravel prairie on gravelly beach ridges. Floodplain forests of silver maple, elm, cottonwood, and ash occurred along rivers and streams (*state.mn.us*).

Native prairies support a biodiverse array of trees, plants, and wildlife important to Tribal communities and play a vital role in maintaining ecological balance. The conversion of native prairies to agricultural land presents significant problems and the loss of native prairies has resulted in a decline in biodiversity, soil erosion and water pollution.

Although land use in the Project Area is mostly agricultural, the TCR Survey observed wildlife, trees, and plants used traditionally and currently for food, medicine, arts, ceremony, and/or materials, summarized in Table 4. Most all of the trees and plants that were observed are listed in *Ethnobotany of the Ojibwe Indians* by Huron H. Smith (1932).

#### Table 4: Trees, plants and wildlife observed

Trees and Plants Observed	Wildlife and Signs Observed
Soybean field, Corn field, Birch, Cottonwood, Popple, Wild	Bear (tracks), Deer (tracks), Grouse, Birds, Frogs,
Strawberries	Grasshoppers, Ducks, possible Moose tracks

### 4.2 Water Resources

To the Ojibwe People, water is sacred. It is the main constituent of the fluids of all living organisms. The Project is within two miles south of the Clearwater River and three miles north of the Lost River (Figure 1), which support a wide range of trees, plants and wildlife that have played an essential role in the cultural importance of the region. Ditch No 57 and 18 are adjacent to the Project Area (Figure 1).

The Enbridge Line 3 pipeline intersects the Clearwater River in Section 9, T151N, R42W in the northern part of Plummer, MN. Although the Project Area is mostly agricultural, it does encompass some field delineated wetland areas interspersed with cropland, collected by Barr in 2022

The Project is within the Clearwater River Watershed. The Minnesota Pollution Control Agency (MPCA) reports that this watershed drains an area of 886,600 acres in the Red River of the North basin. The Clearwater River flows to the northwest and southwest, eventually emptying into Red Lake River near Red Lake Falls. The strategic juncture of the Clearwater and Red Lake Rivers (Section 15, T151N, R44W) near Red Lake Falls, has an extended history of human habitation long before the first white explorers and fur traders came to the area. This crossroads was a favored Indian camp and village site <u>History Tour (redlakecountyhistory.org)</u>.

The upper reaches of the watershed encompass wetlands fed by clear, cold ancient springs low in dissolved oxygen. Approximately one third of the watershed is flat with fertile soils formed by Glacial Lake Agassiz. As a result, intensive agricultural land use in the basin accounts for 54% of the watershed acres (33% intensive row crop farming and 21% grass/pasture/hay). Forest accounts for 25%, wetlands 14% and residential and commercial development 4%. Throughout the watershed, forests and wetlands are interspersed with croplands, which are more prevalent in the eastern portion of the watershed. Extensive ditching and tile throughout the watershed divert water from farms to rivers and streams. These alterations, combined with the loss of historic wetlands and conversion of native prairie to farmland, contribute to frequent floods and can negatively impact aquatic life.

In 2014, the MPCA began an intensive watershed monitoring effort of lakes and streams within the watershed to determine whether they met thresholds that support aquatic life and recreation use. Main resource concerns in the watershed are wind and water erosion, nutrient management, wetland management, surface water quality, flood damage reduction, and wildlife habitat (*state.mn.us*).

The quality of these waters is vitally important to Tribal communities and possible effects from contaminated water include disruption of the bands' traditional lifeways based on the harvest of fresh water, fish, game, wild rice and other aquatic plants, wildlife and resources that are culturally significant.



#### 4.3 New Archaeological Sites

The surveys found two new precontact archaeological sites that OSA assigned to Site 21RL0041 and Site 21RL0042, described below. Additional surface artifacts found include whiteware and a possible lithic shown in section 4.4: Additional Photographs.

Table	5:	New	archaeo	logical	sites
IUNIC	٠.		archaco	.og.cu	51665

Site #	Site Name	PLSS	Cultural/Temporal Affiliation	<b>NRHP Eligibility</b>
21RL0041	Emardville Ground Stone 1	151N, 42W,	Isolated Precontact ground stone	Not eligible
		Section 12	mortar (9500 BC-1650 AD)	
21RL0042	Emardville Ground Stone 2	151N, 42W,	Isolated Precontact ground stone	Not eligible
		Section 12	mortar (9500 BC-1650 AD)	

#### 4.3.1 Site 21RL0041

Site 21RL0041 consists of a hand-held, ground stone mortar constructed from a granitic cobble, approximately 8cm in diameter. It was discovered in a recently tilled and rain-washed field with near 100% ground surface visibility. One shovel test unit was excavated adjacent to the find to a depth of 50cmbs; no artifacts or evidence of features was identified in the shovel test (*https://osaportal.gisdata.mn.gov*). Barr recommended that Site 21RL0041, as it is currently defined, is not eligible for the NRHP. Although not eligible for the NRHP, the new precontact site demonstrates an extended history of Tribal cultural use in the Project Area.

#### Site 21RL0041 photographs





#### 4.3.2 Site 21RL0042

Site 21RL0042 consists of a single ground stone artifact which appears to be a nutting stone or fire starter with two pits ground into a granitic cobble. The cobble measures approximately 9cm by 4cm. One shovel test was excavated adjacent to the artifact, which was negative for cultural resources and features. The site was located on a small rise in an agricultural field, adjacent to what appeared to be a former drainage (*https://osaportal.gisdata.mn.gov*). Barr recommended that Site 21RL0042, as it is currently defined, is not eligible for the NRHP. Although not eligible for the NRHP, the new precontact site demonstrates an extended history of Tribal cultural use in the Project Area.

#### Site 21RL0042 photographs



#### 4.4 Additional Photographs

The TCR Survey was photo documented. Some of the photographs along with type of vegetation and/or wildlife and signs observed by crew members are listed in Table 6. Figure 6 displays the photograph locations that correspond to Table 6 information.

#### Figure 6: Select photograph locations



#### Table 6: Additional photographs









TCR Survey of the Proposed Enbridge Plummer Solar Project—Addendum 1 Page - 24

### 5 Conclusions and Recommendations

The Project lies within the 1863 Ceded Territory, within six miles west of 1889 Ceded Territory. The Project is in Red Lake County, which is partially within the fertile Red River Valley—a place of paramount importance to the heritage and continuing traditions of the Ojibwe and Dakota nations.

In October through November 2022, DDCRM conducted the TCR Survey in conjunction with Barr's Phase I for the northern parcel in the Project Area. In May 2023, DDCRM and Barr completed surveys for the southern parcel in the Project Area after the crops were tilled. The Project Area encompasses approximately 164 acres, located on land primarily agricultural land with some delineated wetlands interspersed with cropland.

Both Tribal cultural and archaeological resources were identified during the TCR Survey and concurrent Phase I of the Project Area. Within the Project Area, the cultural resources identified by the TCR Survey included trees, plants and wildlife traditionally and currently used for food, medicine, arts, ceremony and/or materials. The delineated wetlands within the Project Area provide the type of habitat for food and other natural resources that are traditionally and currently used by Tribes ancestral to this area. The quality of these waters is vitally important to Indigenous communities that harvest fish, game, wild rice and other aquatic plants and animals that are culturally significant.

The TCR Survey and concurrent Phase I found two new archaeological sites assigned by OSA as Site 21RL0041 and Site 21RL0042. Barr determined that both archaeological sites, as they are currently defined, are not eligible for the NRHP. Background research within three miles of the Project Area identified twelve archaeological sites, ten of which are precontact sites. Although not eligible for the NRHP, the new precontact sites in combination with known precontact sites demonstrate an extended history of Tribal cultural use in the area.

Based on the survey results, DDCRM recommends that Enbridge continue to consult with Tribal Resource Managers to ensure protection of irreplaceable cultural/natural resources for future generations. DDCRM also recommends that Tribal Monitors be present for any Project future ground disturbing activities that may impact cultural/natural resources.

The TCR Survey was conducted only within the Project boundary, as defined in this report. If the Project boundary is altered, additional TCR Survey may be necessary.

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