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ARCHAEOLOGICAL LITERATURE REVIEW AND ASSESSMENT FOR THE MINNEHAHA REGIONAL PARK – DOG PARK FENCING PROJECT

**Minneapolis and Fort Snelling Unorganized Territory, Hennepin County,
Minnesota**

June 2025

Certain data regarding the specific location or character of archaeological sites were redacted from this document per Minnesota Statute § 307.08, subd. 11 and Minnesota Statute § 13.37. Additionally, these redacted sections contain information that may be considered sensitive under Section 304 of the National Historic Preservation Act. However, determination of the applicability of Section 304 is the responsibility of the lead federal agency.



ARCHAEOLOGICAL LITERATURE REVIEW AND ASSESSMENT FOR THE MINNEHAHA REGIONAL PARK – DOG PARK FENCING PROJECT

Minneapolis and Fort Snelling Unorganized Territory, Hennepin County,
Minnesota

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MANAGEMENT SUMMARY

During April through June 2025, 106 Group conducted an archaeological literature review and assessment for the Minnehaha Regional Park – Dog Park Fencing Project (Project) located in Minneapolis and Fort Snelling Unorganized Territory, Hennepin County, Minnesota. Minneapolis Park & Recreation Board (MPRB) received a grant from the National Park Service (NPS) to construct fencing on MPRB land to enclose an existing off-leash dog area. The fencing is intended to demarcate the MPRB property boundary and prevent off-leash dogs from entering non-MPRB owned land in the areas adjacent to the Minnehaha Regional Park dog park and in the vicinity of Mni Owe Sni (Coldwater Spring). Because this project is receiving federal funding from the NPS, the Project will need to comply with Section 106 of the National Historic Preservation Act of 1966, as amended, as well as applicable state mandates governing cultural resources such as the Minnesota Field Archaeology Act, Minnesota Historic Sites Act, and Minnesota Private Cemeteries Act.

The project area is located in Section 20, Township 28 North, Range 34 West, Fort Snelling Unincorporated Territory and Minneapolis, Hennepin County, Minnesota. The Area of Potential Effect (APE) has been defined by NPS as the area within the proposed horizontal and vertical construction limits of the proposed new fencing. However, the study area for this literature review and assessment includes a slightly larger area that encompasses the APE, in order to provide information to guide Project decisions, allow for flexibility in construction, and inform future planning. The study area is defined as all areas within the current and proposed future dog park fencing, as well as a 20-foot (ft.) (6 meter [m]) buffer (on MPRB property) and includes approximately 18.6 acres (7.5 hectares) within the Central Lakes Deciduous (4s) archaeological region.

The archaeological investigation included a literature review and desktop assessment. The literature review consisted of a review of documentation of previously identified archaeological sites within the study area and within one mile (1.6 kilometers) of the study area, and of surveys previously conducted within the study area. Historical maps and aerial photographs were also reviewed to aid in the archaeological investigation. The desktop assessment identified whether the study area has the potential to contain unknown intact archaeological resources that may be potentially eligible for listing in the National Register of Historic Places (NRHP).

The literature review identified that the study area is located within the boundaries of one recorded archaeological site, 21HE0099 (Fort Snelling), which is a contributor to the NRHP-listed Fort Snelling Historic District and Fort Snelling National Historic Landmark. The study area was historically part of the US military's ca. 1820-1823 Camp Coldwater, as well as the ca. 1820-1840 Coldwater Spring civilian community. Recent survey has identified intact post-contact archaeological features within the study area, including [REDACTED]. Precontact artifacts have also been reported within the study area and nearby, and the study area is located adjacent to sources of water, including the Mississippi River and Coldwater Spring. Moreover, the study area is relatively undisturbed.

This section contains information regarding the specific location or character of archaeological sites and was removed from this document per Minnesota Statute §13.37

Therefore, the study area is assessed as possessing moderate to high potential for intact significant precontact and post-contact archaeological resources.

106 Group recommends that Project impacts to known archaeological features be avoided, if feasible. Because no systematic survey of the entire study area has been conducted, in order to identify additional archaeological resources, if present, 106 Group recommends a Phase I archaeological field survey be conducted in areas that will be subject to Project-related ground-disturbing activities, prior to construction.

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1.0 INTRODUCTION

During April through June 2025, 106 Group conducted an archaeological literature review and assessment for the Minnehaha Regional Park – Dog Park Fencing Project (Project) located in Minneapolis and Fort Snelling Unorganized Territory, Hennepin County, Minnesota. Minneapolis Park & Recreation Board (MPRB) received a grant from the National Park Service (NPS) to construct fencing on MPRB land to enclose an existing off-leash dog area. The fencing is intended to demarcate the MPRB property boundary and prevent off-leash dogs from entering non-MPRB owned land in the areas adjacent to the Minnehaha Regional Park dog park and in the vicinity of Mni Owe Sni (Coldwater Spring). MPRB is considering two options for fencing material: 4-foot chain link and live staking. Both chain link and live willow stakes would be inserted to a depth of approximately 10 inches.

Because this project is receiving federal funding from the NPS, the Project will need to comply with Section 106 of the National Historic Preservation Act of 1966, as amended, as well as applicable state mandates governing cultural resources such as the Minnesota Field Archaeology Act, Minnesota Historic Sites Act, and Minnesota Private Cemeteries Act.

The project area is located in Section 20, Township 28 North, Range 34 West, Fort Snelling Unincorporated Territory and Minneapolis, Hennepin County, Minnesota (Figure 1). The Area of Potential Effect (APE) has been defined by NPS as the area within the proposed horizontal and vertical construction limits of the proposed new fencing. However, the study area for this literature review and assessment includes a slightly larger area that encompasses the APE, in order to provide information to guide Project decisions, allow for flexibility in construction, and inform future planning. The study area is defined as all areas within the current and proposed future dog park fencing, as well as a 20-foot (ft.) (6 meter [m]) buffer (on MPRB property) (Figure 1). The study area includes approximately 18.6 acres (7.5 hectares [ha]) within the Central Lakes Deciduous (4s) archaeological region.

The archaeological investigation included a literature review and desktop assessment. The literature review consisted of a review of documentation of previously identified archaeological sites within the study area and within one mile (1.6 kilometers [km]) of the study area, and of surveys previously conducted within the study area. Historical maps and aerial photographs were also reviewed to aid in the archaeological investigation. The desktop assessment identified whether the study area has the potential to contain unknown intact archaeological resources that may be potentially eligible for listing in the National Register of Historic Places (NRHP).

The following report describes literature review and assessment methodology, results, and recommendations for the Project. Appendix A contains a list of project personnel.

Figure 1 contains information regarding the specific location or character of archaeological sites and cemeteries and was removed from this document per Minnesota Statute § 307.08, subd. 11 and Minnesota Statute § 13.37

2.0 OBJECTIVES

The primary objective of the literature review was to identify whether there are any known archaeological sites within the study area and to identify whether any portion of the study area may have been previously surveyed. The objective of the archaeological assessment was to gauge whether the study area has the potential to contain any unknown intact archaeological resources that may be potentially eligible for listing in the NRHP. The results of this investigation aid in determining what, if any, additional cultural resources studies may need to be completed to comply with federal and/or state law. All work was conducted in accordance with the Minnesota State Historic Preservation Office (SHPO) *Manual for Archaeological Projects in Minnesota* (SHPO 2005), *State Archaeologist's Manual for Archaeological Projects in Minnesota* (Office of the State Archaeologist [OSA] 2011), and *The Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* [48 Federal Register 44716-44740] (National Park Service [NPS] 1983).

3.0 METHODS

3.1 Literature Review

A literature review, including research at SHPO and OSA, was completed for the project in May 2025 to obtain information regarding previously identified archaeological sites within the study area.¹ Information was gathered on archaeological sites within a one-mile (1.6-km) radius of the study area in order to provide a broader context of the study area and to provide a basis by which to assess the general potential for archaeological sites to be present within the vicinity of the study area. Reports of previous archaeological investigations were also reviewed to determine if any portion of the study area had been previously surveyed and, therefore, would not require further investigation. In addition, multiple documentary sources were consulted, including United States Geological Survey (USGS) topographic quadrangles, historical plat maps, and aerial photographs, in order to identify portions of the study area that possess a higher potential for containing intact significant archaeological sites.

3.2 Archaeological Assessment

The assessment was based on the results of the background research only, and no site visit was conducted.

Areas generally assessed as having a greater probability to contain intact archaeological sites included undisturbed portions of the study area that are:

- located within 150 m (492 ft.) of an existing or former water source of 40 acres (16 ha) or greater in extent or within 150 m (492 ft.) of a former or existing perennial stream;
- located on topographically prominent landscape features;

¹ For background research regarding known historic properties and previously conducted cultural resource surveys, we rely primarily on the information on file at SHPO. The 106 Group cannot guarantee the accuracy and reliability of the data provided.

- located within 100 m (328 ft.) of a previously reported site; or
- located within 100 m (328 ft.) of a former or existing historical structure or feature (such as a building foundation or cellar depression).

Areas assessed as having a relatively low potential for containing intact archaeological resources included inundated areas, former or existing wetland areas, poorly drained areas, areas with slope of 20 degrees or greater, and areas of extensive disturbance.

Additionally, Minnesota Statewide Archaeological Predictive Model (MnModel) data available through the OSA was reviewed to inform and refine areas of precontact archaeological potential identified using the above criteria (Minnesota Department of Transportation [MnDOT] 2025). MnModel uses environmental data, such as landform, vegetation, terrain, and surface waters to generally assess the potential for precontact archaeological sites in certain areas.

4.0 RESULTS

4.1 Literature Review

4.1.1 Previous Studies

Research indicates that one archaeological study has been previously conducted within a portion of the study area. This study, conducted by Two Pines Research in 2016-2020, with field survey in the study area conducted in 2016-2017, was aimed at refining the boundaries of the Fort Snelling National Register Historic District through research and focused survey of the Pike Island, Cantonment New Hope on Picnic Island, Camp Coldwater, and Dakota Stockade areas (Terrell 2020). In the Camp Coldwater area, a portion of their survey overlapped with the southern portion of the study area for this Project. Historical research conducted by Two Pines Research included review of maps and aerial photographs, LiDAR imagery, and previously completed professional and amateur documentation of informal surveys. Two Pines’ 2016-2017 archaeological survey methods included “walkover survey” and shovel testing where needed to investigate suspected archaeological resources or inform assessment of archaeological potential in select areas. However, no shovel testing was conducted within the study area. Because the pedestrian survey transect width and observed surface visibility are not stated in the report, it is not clear whether this previous study conformed to SHPO and OSA standards for intensive Phase I archaeological survey (OSA 2011; SHPO 2005). For this reason, it is not possible to say that the study area has been previously subject to systematic archaeological survey meeting OSA and SHPO standards, and therefore the Two Pines survey is not shown on Figure 1. However, Two Pines’ survey did result in the documentation of resources within the study area, and therefore it is included in this section. Resources are discussed in Section 4.1.2 below.

In addition to the Two Pines investigation, informal survey and mapping of the Coldwater area, including the MPRB property, was conducted in 1971 by Loren Johnson and Charlie Nelson (Terrell 2020). Features documented during these visits within the study area include [REDACTED]. It does not appear that additional investigation beyond mapping was completed at this time.

This section contains information regarding the specific location or character of archaeological sites and was removed from this document per Minnesota Statute §13.37

4.1.2 Previously Identified Archaeological Resources

One archaeological site has been recorded (field confirmed) and no sites have been reported (not field confirmed) within the study area (Table 1, italicized entry; Figure 1). Four additional sites have been recorded, and three sites have been reported within one mile of the study area (Table 1; Figure 1).

Table 1. Previously Identified Archaeological Sites within One Mile of the Study Area

Site No.	Site Name	Township	Range	Section	Description
<i>21HE0099</i>	<i>Fort Snelling</i>	<i>28N</i>	<i>23W</i>	<i>17</i>	<i>Post-contact military fort; precontact and contact period American Indian habitation</i>

Site No.	Site Name	Township	Range	Section	Description
21HE0309	-	28N	23W	20	Post-contact habitation
21HE0386	Minnehaha	28N	23W	17	Precontact habitation and post-contact artifacts
21HE0391	Debris Field	28N	23W	17	Precontact lithic scatter and post-contact artifact scatter
21HE0440	-	28N	23W	20	Isolated precontact artifact
21HEap	Taku Wakan Tipi	28N	23W	17	Place of traditional cultural importance to Dakota; possible post-contact cemetery
21RAe	Pike Island	28N	23W	27	Historically mapped location
21RAk	Rumtown	28N	23W	17	Historically mapped post-contact community

Site 21HE0099, which the study area is located within, is associated with Fort Snelling, a U.S. military installation active between 1819 and 1946. Fort Snelling was designated as a National Historic Landmark (NHL) in 1960, and with the passage of the NHPA in 1966, was listed in the NRHP as a historic district. Site 21HE0099 is a contributing resource to both the NHL and the NRHP District. The study area is located within a subarea of Fort Snelling known as Camp Coldwater. Historically, this area was used by Dakota, Ojibwe, and other Native American communities prior to and during the period of U.S. occupation; served as an early army campsite during the construction of Fort Snelling (known as Camp Coldwater, ca. 1820–1823); and later became a community of traders, tradespeople, and other civilians between 1821–1840, referred to in this report as the Coldwater Spring civilian community.²



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² The Coldwater Spring civilian community was in the same location as Camp Coldwater; throughout this document the phrase “Coldwater Spring civilian community” will only refer to this latter period of civilian occupation and not the military campsite.

³ The geographic area surrounding Coldwater Spring and the historical Camp Coldwater is referred to as the “Coldwater area” to distinguish it from the NRHP-listed Mni Owe Sni (Coldwater Spring) TCP and the historical military camp.

[REDACTED]

[REDACTED]

Although not an archaeological property, it is worth noting that in 2023, Mni Owe Sni/Coldwater Spring was listed in the NRHP (SG100009497) as a Traditional Cultural Place (TCP) for its association with Dakota beliefs and traditions from time immemorial to the present (Terrell 2006; Jackson and Ott 2023). Because the Mni Owe Sni/Coldwater Spring TCP is a natural and cultural property, and not an archaeological resource, it is not addressed further in this report.

4.1.3 Environmental History Overview

The study area is located within a wooded area on a bluff above the Mississippi River. Several sources of perennial water are near the study area, including the Mississippi River, located immediately to the east of the study area, and Coldwater Spring, located approximately 1400 ft. (425 m) to the southwest.

Soils in the study area are primarily Dorset, bedrock substratum - Rock outcrop complex, 25-65 percent slopes, which are characterized by sandy loam over coarse sandy loam and gravelly coarse sand, with bedrock commonly found at 60-80 inches below the surface (Natural Resources Conservation Service 2025). Also present are Urban lands-Hubbard, bedrock substratum complex, 0 to 8 percent slopes, characterized by loamy sand over bedrock at 60-80 inches below the surface (Natural Resources Conservation Service 2025). The study area is located within the Anoka Sand Plain (222Mc) ecological subsection, Minnesota and NE Iowa Morainal ecological section, Eastern Broadleaf Forest ecological province, which is generally characterized by forests, glacial lakes, and rivers (Minnesota Department of Natural Resources [MnDNR] 2025). It is located within the Central Lakes Deciduous South archaeological region.

4.1.4 Historical Overview

The study area is located near the confluence of the Minnesota and Mississippi Rivers, an area of significance to the Dakota known as Bdote (Westerman and White 2012). Many Dakota villages and places of importance have been documented along the Minnesota and Mississippi river valleys, several within miles of the study area (Durand 1994). Bdote is and has been a spiritually and historically significant place to the Dakota people for over 10,000 years. It is respected as a place of creation and coming together for many of the Dakota people and other American Indian Nations (Westerman and White 2012). Coldwater Spring, located just southwest of the study area, was used by the Dakota prior to the American occupation of the area, and continued to be used by Dakota and Ojibwe periodically thereafter (Terrell 2006).

The Bdote area has a rich history dating back approximately 12,000 years (Fleming and Anderson 2018). For thousands of years prior to the arrival of Europeans, American Indian groups within the Siouan language family, including the Dakota, Ojibwe, and Ioway, were living in the southern part of the land that would later become known as Minnesota. In the mid-seventeenth century, the westward expansion of the fur trade, a growing Euro-American presence, and conflicts between tribes resulted in the migration of the Ioway and Ojibwe south and west into what is now Iowa and Nebraska (Forsberg 2003). During this time, the Dakota presence increased in present-day southeastern Minnesota, due in part to the expansion of Ojibwe settlement in northern and central Minnesota. Euro-Americans arriving in present-day southeastern Minnesota, therefore, encountered the Dakota, who were living across present-day Minnesota as well as in parts of present-day Wisconsin, Iowa, and the Dakotas, based on accounts of mid-seventeenth-century French travelers (Westerman and White 2012).

The earliest Euro-Americans in Minnesota were French missionaries and fur traders during the mid-to-late seventeenth century, followed by British, and later American, traders and explorers in the eighteenth and nineteenth centuries. The arrival of Euro-Americans initiated a 200-year process of dramatic alteration of the environment and social landscape through the fur trade, warfare, settlement, and treaties. This process continually forced American Indian peoples to find new ways to adapt to an increasingly altered homeland.

In September 1805, American explorer Zebulon Pike met at Bdote with Dakota leaders, two of whom agreed to sign a treaty selling 100,000 acres of land to the United States government in exchange for an unspecified sum. By 1820, the first cornerstone of the fort that was to become Fort Snelling had been laid by the U.S. military, despite the fact that the title to the land purchased in the 1805 treaty remained in question into the 1850s (Anfinson 2003; MIAC et al. 2021). The fort originally housed military garrisons as well as the St. Peter's Indian Agency. During the Civil War, Fort Snelling became a training and staging post, and numerous new buildings, roads, and trails were constructed. Following the US-Dakota Conflict of 1862, about 1,500 Dakota prisoners were held in a concentration camp at Fort Snelling over the winter of 1862–1863. Fort Snelling grew in the period following the Civil War, with the Upper Post being established south and west of the Lower Post. Fort Snelling continued to function as an active

military facility until after the Second World War. In 1946, Fort Snelling was decommissioned (Quinn Evans Architects 2017).

In the 1820s and 1830s, refugees from the Selkirk Colony in Manitoba arrived in the Coldwater area, establishing the Coldwater Spring civilian community. Many of these refugees were of Swiss or Scottish origin and were farmers or skilled craftspeople, as well as midwives and domestic servants for officers stationed at Fort Snelling (Terrell 2020). Other residents of the Coldwater Spring civilian community included traders, as well as blacksmiths and translators who worked for the St. Peter’s Indian Agency; many of their wives were of Ojibwe or Dakota origin (Smith 2021). Likely due to these family ties, Ojibwe parties often camped at Coldwater Spring civilian community when visiting the Indian Agency (Smith 2021). At its largest in the 1830s, the Coldwater Spring civilian settlement included a diverse mix of Scottish, Swedish, and Swiss settlers, American traders, Native Americans, and individuals of mixed ancestry. In 1840, the U.S. Army, declared the Coldwater Spring civilian community settlers to be “squatters” and evicted all residents of the community and burned their houses (DeCarlo 2020).

The earliest historical maps that show the study area date from the initial period of military occupation and the subsequent civilian community. Maps from 1820, 1821, and 1823 show details of the military Camp Coldwater located just southwest of the study area, but do not depict anything within the study area itself (Heckle 1821; Marsdon 1823; Talcott 1820). The first map to show historical features [REDACTED] [REDACTED] dates to 1837. This map shows two structures, labeled “Massey’s” and “Brunell’s,” along with a “Good Landing” along the Mississippi River, and a road or trail connecting the structures and landing to a larger northwest-southeast oriented road “to Coldwater Spring” (Smith 1837; Figure 2). One structure is visible in this general area on a less-detailed 1838 map (Smith 1838). According to an 1838 census, Louis Massey (also spelled “Massie” or “Massy”) was a settler and mail carrier, and his household included three males and one female (Terrell 2020). Massey, a Selkirk colonist, settled near Camp Coldwater in 1828 and lived there until the settlers were expelled from the Coldwater Spring civilian community in 1840. Massey’s wife, Françoise Marie Boucher, was of mixed European and Ojibwe origin, making their family one of several in the community comprised of Euro-American and Native American cultures. Louis Brunell (also spelled Brunelle) was a settler whose household included his wife, Angelique Cotty, and four children (Hoffmann 1927; Schoen 2002). Angelique Cotty (also spelled Cotte or Côté) was also likely of mixed European and Ojibwe ancestry (Minnesota Canadian Interest Group 2025).

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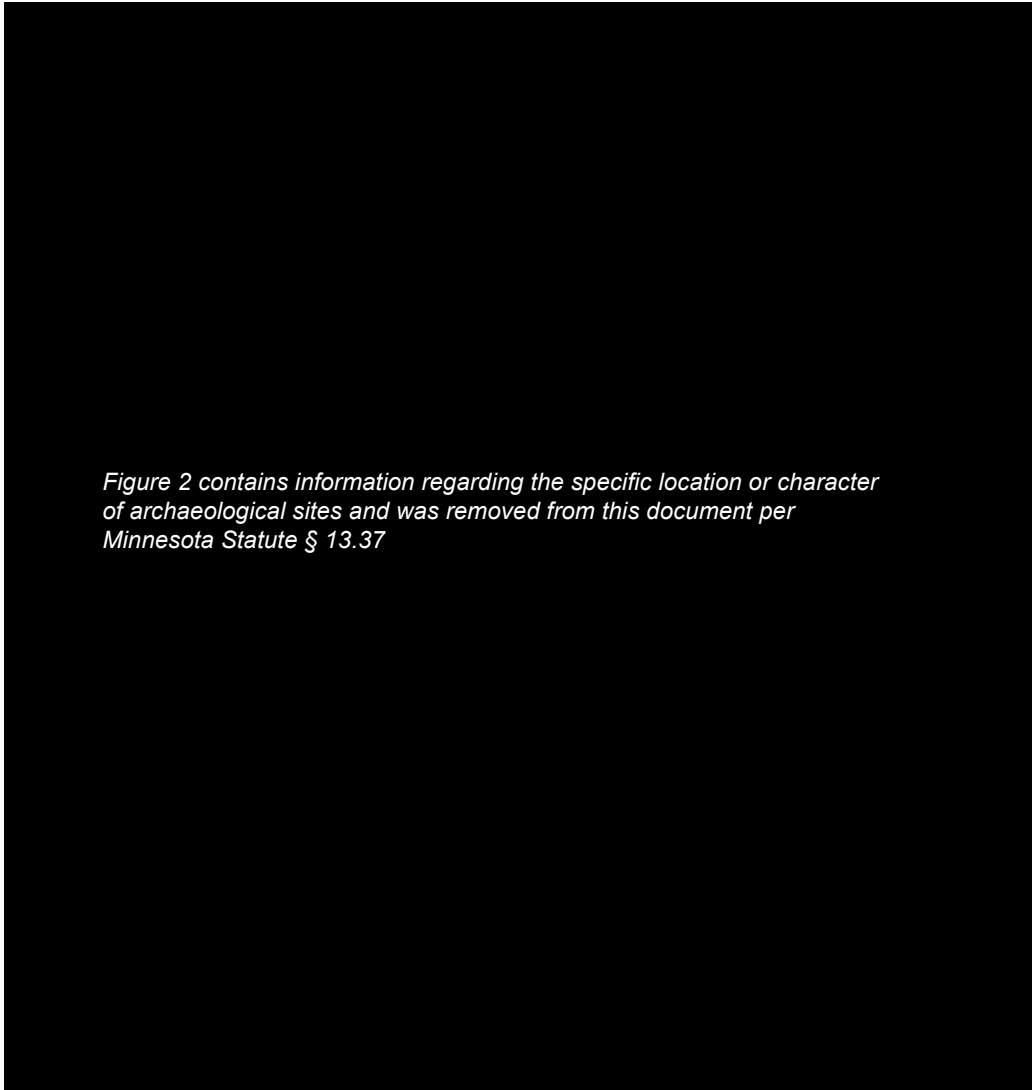


Figure 2 contains information regarding the specific location or character of archaeological sites and was removed from this document per Minnesota Statute § 13.37

Figure 2: 1837 map of Coldwater area, with Massey's house, Brunell's house, Good Landing, and roads in the vicinity of the study area (in red circle) (Smith 1837)

Later maps do not show any development within the study area. Aerial imagery from 1938 through 1957 shows some disturbance in the extreme northern portion of the MPRB property, just at the edge of the study area; this is likely from a WPA quarry (University of Minnesota 1938, 1953, 1957). Aerial imagery from 1957 and later shows power lines cutting through the area from northwest to southeast, but no other evidence of development or disturbance is visible. In recent decades, the area has been used as an off-leash dog park, although evidence of this use is not apparent in maps or aerial/satellite photos.

4.2 Archaeological Assessment

The study area is within archaeological site 21HE0099, Fort Snelling. Within 21HE0099, there are many documented precontact artifacts, [REDACTED].

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[REDACTED] Given the study area's proximity to water, the documented presence of Native American groups before and during the Fort Snelling-related use of the area, and the previous precontact artifacts found in the area, the study area is assessed as possessing moderate to high potential for intact significant precontact archaeological resources.

The redacted sections on this page contain information regarding the specific location or character of archaeological sites and were removed from this document per Minnesota Statute §13.37

As discussed above, recent archeological survey (Terrell 2020) identified several well-preserved post-contact archaeological features within the study area that are associated with the 1821–1840 Coldwater Spring civilian community, including [REDACTED]

Two Pines' 2016-2017 survey demonstrated that known archaeological features related to the Coldwater Spring civilian community, [REDACTED] are intact and have excellent data potential: they can be associated with individual families, have a single period of historical occupation, were subject to rapid abandonment when the Coldwater Spring settlers were removed in 1840, and remain well-preserved. Therefore, data from the known archaeological features within the study area, as well as others that may potentially exist, have the potential to contribute important information regarding the diverse Coldwater Spring civilian community, and would likely contribute to the significance of the NRHP-listed Fort Snelling Historic District and the Fort Snelling NHL. Therefore, the study area is assessed as possessing moderate to high potential for intact significant post-contact period archaeological resources.

Although many portions of the Coldwater area were heavily disturbed by the construction and demolition of the Bureau of Mines Twin Cities Research Center Campus, the study area was not part of this campus and was therefore not subject to disturbance related to its use or demolition. Maps and aerial imagery dating after 1837 do not indicate development or significant disturbance, suggesting that this area remained relatively undisturbed over time. Although there is a corridor of overhead power lines that cuts through some of the study area, disturbance from the construction of these lines was likely localized and related to construction of towers and vegetation removal. The [REDACTED] documented by Two Pines within the study area was described as "well-preserved," and the [REDACTED] are still evident in LiDAR imagery and on the ground (Terrell 2020:141-143). While no shovel testing was conducted within the study area, shovel testing completed near similar features outside of the study area demonstrated intact subsurface contexts (Terrell 2020). Based on this, and on the good state of preservation observed on the surface within the study area, it is likely that the study area is characterized by similarly good subsurface preservation. The existence of known precontact and post-contact archaeological resources combined with the lack of significant disturbance strongly suggests the potential for additional intact precontact or post-contact archaeological features, which are likely to yield additional important information.

Figure 3 contains information regarding the specific location or character of archaeological sites and was removed from this document per Minnesota Statute § 13.37

5.0 RECOMMENDATIONS

The literature review identified that the study area is located within the boundaries of one recorded archaeological site, 21HE0099 (Fort Snelling). The study area was historically part of the U.S. military's Camp Coldwater, as well as the ca. 1820-1840 Coldwater Spring civilian community. Recent survey has identified intact post-contact archaeological features within the study area, including [REDACTED] (Terrell 2020). Precontact artifacts have also been reported within the study area and nearby, and the study area is located adjacent to sources of water, including the Mississippi River and Coldwater Spring. Moreover, the study area is relatively undisturbed. Therefore, the study area is assessed as possessing moderate to high potential for intact significant precontact and post-contact archaeological resources.

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106 Group recommends that Project impacts to known archaeological features be avoided, if feasible. Because no systematic survey of the entire study area has been conducted, in order to identify additional archaeological resources, if present, 106 Group recommends a Phase I archaeological field survey be conducted in areas that will be subject to Project-related ground-disturbing activities, prior to construction.

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APPENDIX A: PROJECT PERSONNEL

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