



# Cultural Resources

Within the context of the National Environmental Policy Act (NEPA), “cultural resources” typically refers to identified historic properties (considered under the National Historic Preservation Act or NHPA) and tribal resources. From a broader context, cultural resources encompass a wide range of resources associated with the way people interact with the surrounding natural and physical environment. A NEPA environmental review must address the effects that a project would have on cultural resources. A specifically prescribed method is used to identify and consider all types of cultural resources and balance the need for development with the need to protect cultural resources.

The Final Environmental Impact Statement (Final EIS) for the NorthMet Mining Project and Land Exchange looks at how the proposed NorthMet project would affect historic properties and cultural resources important to the Ojibwe people of northeastern Minnesota, including the Bois Forte Band of Chippewa, Fond du Lac Band of Lake Superior Chippewa, and Grand Portage Band of Chippewa (collectively the Bands).

## How could the proposed NorthMet project affect cultural resources?

The proposed NorthMet project would primarily affect historic and cultural resources during construction and operations, through excavation, filling, earth-moving, and other activities that could result in access restrictions, visual obstructions, noise, vibration, and dust.

Significant cultural resources identified within or near the proposed NorthMet project site include:

- the Spring Mine Lake Sugarbush site (maple sugar camp site) that is not located within the proposed NorthMet project footprint area, but could be affected by atmospheric effects, dust deposition, and inadvertent damage due to its location near key operational areas;
- the Partridge River Section of the *Mesabe Widjiu* (or Laurentian Divide, regarded as a sacred place to the Ojibwe people) that occurs within the proposed NorthMet project area, which would be affected due to direct and indirect impacts and the diminished quality of use by the Bands;
- the Partridge River Segment of the Beaver Bay to Lake Vermilion Trail that occurs within the proposed NorthMet project footprint area, which would be directly affected by construction;
- the Erie Mining Company Hoyt Lakes Operation Mining Landscape Historic District that is comprised of the Erie Plant Site and existing railroad infrastructure within the proposed NorthMet project area, and would be affected by both new construction and demolition of contributing buildings;

- the Erie Mining Company Railroad Mine and Plant Track, Main Line Segment, and Dunka Railroad Segment that occur within the proposed NorthMet project area, which would not be affected;
- the Duluth, Missabe, and Iron Range (DM&IR ) Railroad Segment that is located within the proposed NorthMet project area, but would not be affected;
- the Erie Mining Company Administration Building that occurs within the proposed NorthMet project area, which would not be affected; and
- the Erie Mining Company Concentrator Building that occurs within the proposed NorthMet project area, which would be affected through its proposed refurbishment and use.

The proposed NorthMet project area is also located on land that was ceded to the United States by the Bands under the 1854 Treaty. As part of the Treaty, the Bands reserved the right to hunt, fish, and gather on these lands. Some resources, such as fish, plant, and animal species, would be affected by the proposed NorthMet project; from a cultural resources context, the degree of impacts due to the proposed NorthMet project to these resources is unknown.

#### **How were the potential effects determined?**

The federal Co-lead Agencies (U.S. Army Corps of Engineers and U.S. Forest Service) consulted with the Bands and the State Historic Preservation Office (SHPO) to determine if the cultural resources listed above were eligible for listing in the National Register for Historic Places (NRHP). Places that were not eligible for the NRHP were eliminated from further consideration within the Section 106 process; if these properties have other cultural importance, then this is discussed in the Final EIS.

A discussion of treaty rights under the 1854 Treaty is included in the Final EIS as part of the cultural context used to understand the significance of the Ceded Territory to the Bands.

As part of the NHPA process, the federal Co-lead Agencies have included consulting parties such as the Bands in the finding and determination process completed to date. Multiple historic property identification efforts took place over a 15-year period within the proposed NorthMet project area, which include standard field inventory and assessment, as well as identification of properties of cultural and religious significance to consulting Bands.

#### **What would be done to avoid or minimize these effects?**

The federal Co-lead Agencies have taken into account the effects of the proposed NorthMet project on properties that are listed on, or considered eligible for listing on, the NRHP per Section 106 of the NHPA. Because the proposed NorthMet project would result in an adverse effect on certain eligible properties, the federal Co-lead Agencies have consulted with the SHPO, the Bands, and PolyMet to identify practicable ways to avoid, minimize, or mitigate the harmful effects of the undertaking. PolyMet has made efforts to avoid or minimize effects by moving project-related activities away from cultural resources. Additional mitigation measures could include: 1) monitoring the effects of activities occurring near these resources; and 2) study, dissemination, and interpretation of historic properties outside of the proposed NorthMet project area. The federal Co-lead Agencies are currently in the process of

developing a Memorandum of Agreement, which will identify the steps the federal Co-lead Agencies would take to avoid, minimize, or mitigate the adverse effects.

**For more information about how cultural resources would be affected by the NorthMet Mining Project and Land Exchange, see the Executive Summary, Sections 4.2.9 and 4.3.9 (Affected Environment, Cultural Resources), Sections 5.2.9 and 5.3.9 (Environmental Consequences, Cultural Resources), and Chapter 6 (Cumulative Effects) of the Final EIS. Also, refer to additional Fact Sheets about the NorthMet Mining Project and Land Exchange Final EIS:**

- 1. Project and Land Exchange Overview**
- 2. What is the Environmental Review Process?**
- 3. What's Changed since the Draft EIS?**
- 4. What's Changed since the Supplemental Draft EIS?**
- 5. Supplemental Draft EIS Comment Response Process**
- 6. Effective Commenting on the Final EIS**
- 7. A Guide to the Final EIS Document**
- 8. Air Quality**
- 9. Water Quantity**
- 10. Wetlands**
- 11. Water Quality**
- 12. Wild Rice**
- 13. Mercury**
- 14. Threatened & Endangered Species**
- 15. Cultural Resources**
- 16. Land Exchange**
- 17. Reclamation & Financial Assurance**
- 18. Cumulative Effects**
- 19. Tailings Basin Stability**
- 20. Water Modeling**
- 21. Northward Flowpath**
- 22. Duration of Treatment & Financial Assurance**
- 23. Human Health**