

**FOREST COUNTY POTAWATOMI COMMUNITY
COMMENTS
ON
PROPOSED REVISIONS TO CH. NR 446,
RELATING TO LIMITS ON MERCURY EMISSIONS
FROM COAL-FIRED ELECTRIC GENERATING UNITS**

MAY 5, 2008

EXHIBIT 4

DEPARTMENT OF THE ARMY
ST. PAUL DISTRICT, CORPS OF ENGINEERS
ARMY CORPS OF ENGINEERS CENTRE
190 FIFTH STREET EAST
ST. PAUL, MINNESOTA 55101-1638

REPLY TO
ATTENTION OF

AUG 1 2003

Construction-Operations
Regulatory Branch

Mr. Sherman Banker
Historic Preservation Division
State Historical Society of Wisconsin
816 State Street
Madison, Wisconsin 53706

In re: SHWS#: 82-0335/FR/LG, Crandon Mine

Dear Mr. Banker,

The St. Paul District, Corps of Engineers, has received and reviewed a determination of eligibility submitted by the Forest County Potawatomi Community (FCPC) and their consultants for an historic property of cultural importance to them. The property under consideration is called the Forest County Potawatomi Traditional Resource Catchment District (FCP Traditional District). Tribal consultants Charles E. Cleland and Richard A. Carlson prepared the determination of eligibility form (DOE) and the supporting study entitled *The Elders Speak: Natural Resource Use By The Forest County Potawatomi Community*. The information was submitted to the St. Paul District to assist in its consideration of historic properties under Section 106 of the National Historic Preservation Act for the Crandon Mine permit.

The proposed FCP Traditional District includes two areas known as the Devils Lake Catchment and the Thunder Catchment (see attached map). These two areas have been foci of the traditional procurement of resources for the Forest County Potawatomi for the last 120 years. The areas were identified through interviews with knowledgeable tribal members as documented in *The Elders Speak*. The two catchment areas contain the essential resources necessary to the maintenance of many aspects of the Forest County Potawatomi cultural identity, including the pure water, plants and animals necessary for ceremony, medicines, and special traditional foods.

The Forest County Potawatomi Traditional Resource Catchment District consists of two areas with approximate boundaries defined by actual historic use. The actual collection

sites and traditional gathering areas described by tribal members are considered extremely proprietary. They are shown on a confidential map on file with the Forest County Potawatomi Community. These catchment areas each have a diameter of roughly 10 miles and each has the diversity and purity necessary to supply the natural resources requisite for continuation of Potawatomi traditional culture. The property can be described as a district, since it consists of a linkage of sites and resource areas that together form a cultural whole. The boundaries shown in the attached maps describe the boundary of the extent of those linked sites and resource areas, which are habitats supporting culturally important plants and animals (see list in DOE). The boundaries should not be understood as indicating that everything within them are contributing elements

The report and the DOE provide evidence for the historic and cultural contexts for the FCP Traditional District. The resource use described in the study indicates roots in community history. The beliefs and practices associated with the resources of these catchments continue to act as a basic element forming the cultural identity of the community by a) providing the necessary resources (whether water, plant or animal) for medicine and ceremony, and b) exercising traditional knowledge and its transmission to the next generation.

The Resource Catchment District meets Criterion A, that is, they are associated with events that have made a significant contribution of broad patterns of Potawatomi history. The long oral and written histories of the Forest County Potawatomi agree that the use of wild game, fish, and plant products gathered from nature sustained the Potawatomi until after the midpoint of the twentieth century. Today these same resources are no less important as the source of "pure" foods for ritual and for medicinal purposes and for subsistence and craft production. The Potawatomi believe that the continued health of the natural world as well as their own continued existence as a people requires the use of these resources to conduct rituals of harmony and atonement.


The study has demonstrated that the District retains integrity of relationship to the practice and belief of the Potawatomi. Interviews revealed that use of the same areas to obtain culturally important resources can be traced back three generations, and are in active use today. Although each catchment contains some developed and agricultural land, especially the western one, each retains to a large degree the essential habitats to support the natural resources that make them important to the Potawatomi. The FCP Traditional District also retains integrity of condition, and its relatively pristine condition is illustrated by the photographs in *The Elders Speak*

The St. Paul District finds that the Forest County Potawatomi Traditional Resource Catchment District is eligible for the National Register of Historic Places under Criterion A, association with events that have made a significant contribution to the broad patterns of Potawatomi history.

Enclosed for your review and comment is the study *The Elders Speak* and the determination of eligibility form for the Forest County Potawatomi Traditional

Catchment District . We would be grateful for your response by 30 August 2003. Please call Sissel Johannessen (612 770-6449) with any comments or questions.

Sincerely,


Robert J. Whiting,
Chief, Regulatory Branch

Enclosures

Copies furnished (without enclosures):

✓ Douglas B.L. Endreson, Sonosky, Chambers, Sachse, Endreson & Perry, 1250 Eye Street, N.W.,
Suite 1000, Washington, DC 20005

Jon Ahlness, Project Manager for Crandon Mine EIS, CO-R, St. Paul District, Corps of
Engineers