

**Ethnographic Traditional Cultural Property Study
of the Mouth of the Kalamazoo River, Allegan County, Michigan,
with Recommendations as to its Eligibility for Listing in the
National Register of Historic Places**

Prepared for



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1.0 Project Introduction

Algonquin Consultants, Inc. (Algonquin) is pleased to present the results of an ethnographic study of the mouth of the Kalamazoo River.

This study was prepared at the request of the Match-E-Be-Nash-She-Wish Band of Pottawatomi Indians (also known as the Gun Lake Tribe), in order to help inform the U.S. Army Corps of Engineers, Detroit Region's (USACE-Detroit) evaluation of a permit application submitted by North Shores of Saugatuck, LLC, (North Shores) for a Department of the Army permit under Section 10 of the Rivers and Harbors Act of 1899 and Section 404 of the Clean Water Act (Permit No. LRE-2010-00304-52-S17-2; Figure 2).

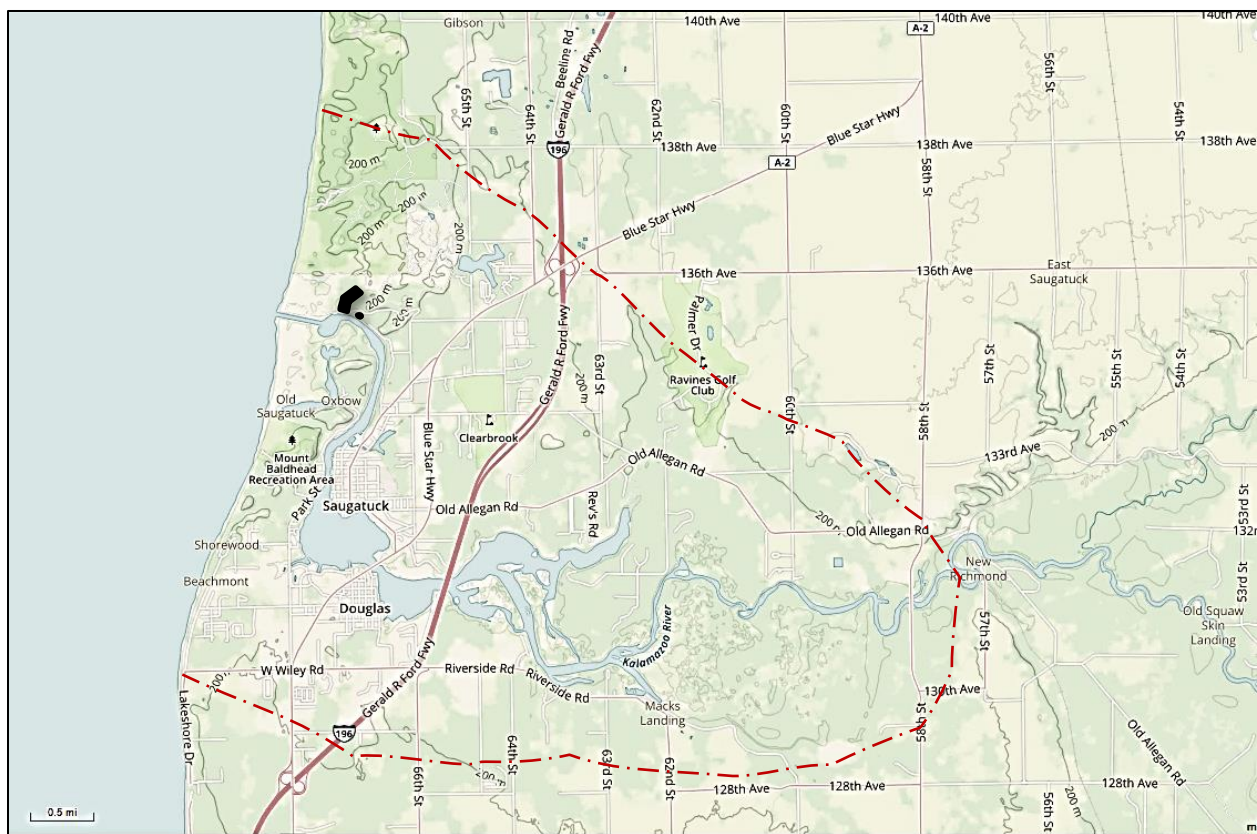


Figure 1: Location of the area designated by the Match-E-Be-Nash-She-Wish Band as the mouth of the Kalamazoo (red dashed line) and the proposed North Shores marina permit area and laydown area (black polygons). Background map from ESRI (scale in lower left is 0.5 mi). Permit area locations taken from enclosures in USACE-Detroit letter of 29 August 2019. *North is to the top.*

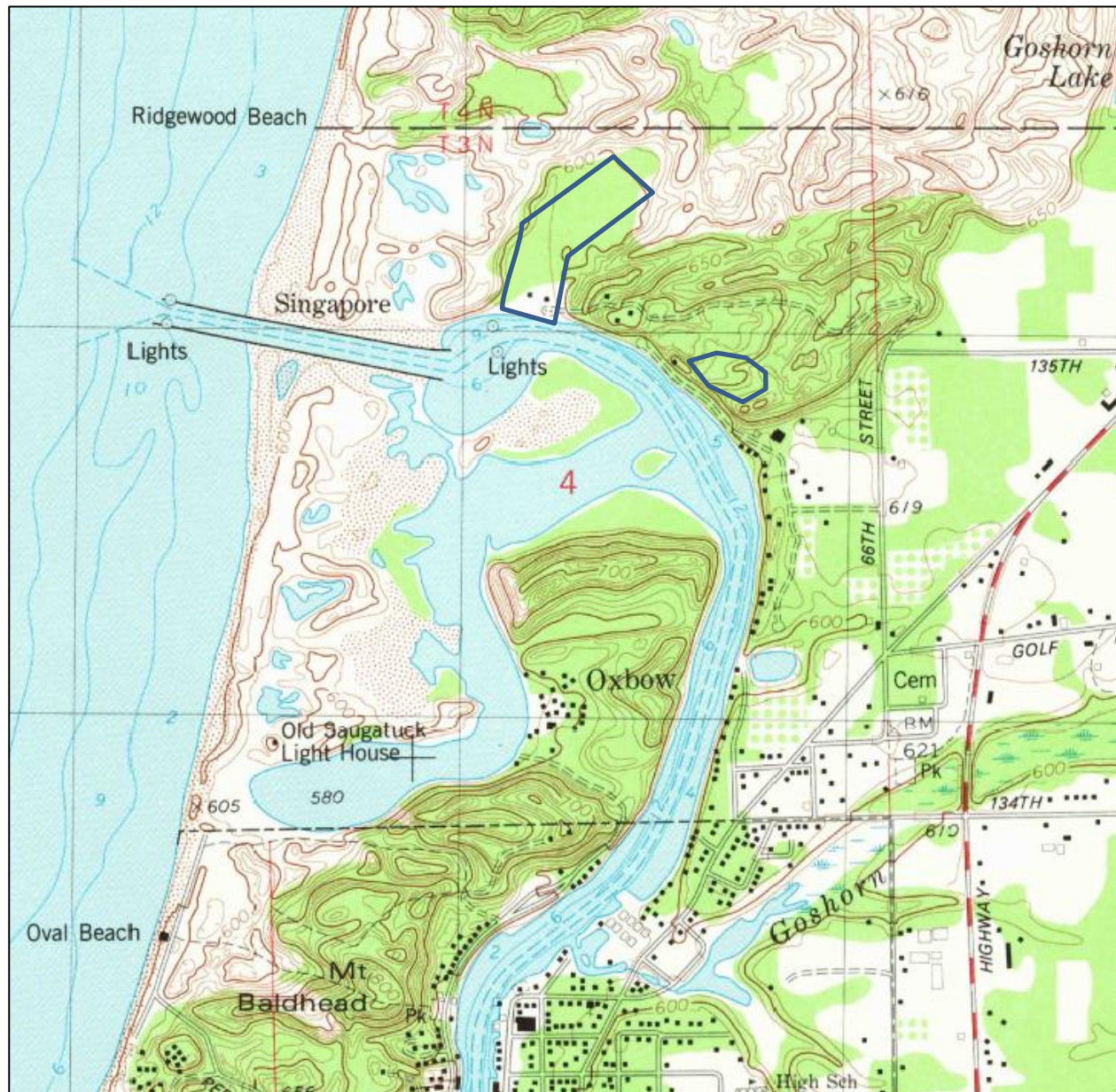


Figure 2: Location of the proposed North Shores marina permit area and laydown area (blue polygons) in Section 4. Background map is a portion of the Saugatuck 1:24,000 USGS topo map. Contour interval is 10 ft, sections are 1.0 mi (1.61 km) on a side. Permit area locations taken from enclosures in USACE-Detroit letter of 29 August 2019. North is to the top.

Algonquin's study gathered, organized, and researched ethnographic and ethnohistoric information related to the mouth of the Kalamazoo River (see Figure 1); this information is summarized in the following report. Based on that research, Algonquin assessed whether the mouth of the Kalamazoo River is a TCP

associated with the Match-E-Be-Nash-She-Wish Band of Pottawatomi Indians, as defined by the National Register (36 CFR 60.4) and as described in *National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties* (Parker and King 1998), and under which criterion or criteria it may be eligible (36 CFR 60.4a-d). The manner of this assessment and its findings are discussed further below.

North Shores proposes to construct a marina basin at the mouth of the Kalamazoo River in Saugatuck Township, Michigan. If the project is permitted, a 6.5-acre marina basin will be excavated from upland areas adjacent to the River's mouth. The project also will include the construction of marina docks, pilings, boat hoists, seawalls, and riprap erosion protection. In all, the marina would house 50 boat slips, each between 40 and 80 feet long. The proposal notes that all excavated material from the marina will be transported by truck and disposed of in a laydown area approximately 7.7 acres in size (Figures 1 and 2). A luxury, gated residential development planned for areas around the marina is not included in the permit.

As part of their permit review process, USACE-Detroit is currently reviewing the project's potential impacts on historic places in accordance with Section 106 of the National Historic Preservation Act and, more broadly, on cultural resources in accordance with Section 102 of the National Environmental Policy Act (NEPA).

Although USACE-Detroit has not yet established what historic properties or other cultural resources will be affected – nor determined how they will be affected in accordance with the National Historic Preservation Act Section 106 regulations of the Advisory Council on Historic Preservation – USACE-Detroit has advised the Match-E-Be-Nash-She-Wish Band of Pottawatomi Indians of Michigan (Match-E-Be-Nash-She-Wish Band) that it wishes to negotiate a Memorandum of Agreement (MOA) with project stakeholders. Comments on the MOA, originally due 29 September 2019, have been solicited from the Match-E-Be-Nash-She-Wish Band; the original date for comments was extended to 29 November 2019.

Phase I background research and pedestrian archaeological survey of the North Shores permit area by Ball State University (Purtill et al. 2018) earlier identified four areas with intact archaeological resources. The archaeological materials identified by the Phase I survey included artifacts, building foundations, a buried midden, and a pit feature, some of which may be related to the former town of Singapore. A prehistoric stone flake was found within one of the four archaeologically sensitive areas, but no other prehistoric material was found. Based on these findings, the Corps determined that the North Shores permit area contains resources that are part of an archaeological site (Singapore, state-designated archaeological site 20AE619) and that the site is eligible for listing in the National Register of Historic Places (National Register) under 36 CFR 60.4(D).

USACE-Detroit also has reviewed comments submitted by tribes in the area, including the Match-E-Be-Nash-She-Wish Band, regarding the North Shores marina permit, and asserted that:

Available information on past or present tribal use of the area does not indicate that the area is of a specific cultural importance; rather, it suggests general use of the area similar in nature to tribal use of other broad geographic areas. The activities described occurred in various locations and waterways and are not clearly tied to the Kalamazoo River mouth or another particular area that includes the permit area. We have

received no information or comment suggesting that particular beliefs or cultural practices are associated with the permit area itself. Therefore, the permit area does not appear to be a TCP.

By “TCP,” USACE-Detroit refers to a “traditional cultural place” or “traditional cultural property,” a location that is significant to the maintenance of a tribe’s or other community’s cultural identity and hence is eligible for listing in the National Register, usually under 36 CFR 60.4(a), (b), and/or (c). TCPs are discussed in *Guidelines for Evaluating and Documenting Traditional Cultural Properties* (Parker and King 1998).

In comments submitted to USACE-Detroit, the Match-E-Be-Nash-She-Wish Band asserted that the mouth of the Kalamazoo River is, in fact, a distinctive TCP eligible for the National Register not only in its own right, but also as part of a larger Traditional Cultural Riverscape used by tribal peoples for generations. A “riverscape” is a landscape in which a river plays a defining role (for a discussion, see King 2004:4–5). The tribe has also stated that traditional cultural resources such as lake sturgeon and wild rice are contributing elements to the mouth of the Kalamazoo River TCP and will be negatively affected by the marina, particularly vis-à-vis ongoing efforts by the tribe to restore and reestablish these cultural resources within the marina’s presumed Area of Potential Effects (APE; see Figures 1 and 2).

The tribe has further asserted that many other important historic places and other cultural resources will likely be affected by the marina, including known burial sites, historic village site(s), and plant and animal resources. As well, multiple spiritual and ceremonial practices still are conducted at the mouth of the Kalamazoo River. These beliefs and relationships associated with the mouth, the tribe has affirmed, have been in place for generations. Despite the previous manipulation of the mouth of the river to create a shipping channel, the Match-E-Be-Nash-She-Wish Band emphasizes that the Kalamazoo River watershed, and its mouth, still “maintains its integrity due to the same cultural resources, beliefs, and practices continuing to exist on and along the watershed, including the mouth of the river” (Match-E-Be-Nash-She-Wish Band’s Tribal Historic Preservation Officer, comments provided to USACE-Detroit during consultation for the Permit No. LRE-2010-00304-52-S17-2).

Concerned by the USACE-Detroit’s dismissive response to its comments, the Match-E-Be-Nash-She-Wish Band contracted with Algonquin to conduct an independent ethnographic evaluation of the mouth of the Kalamazoo as a TCP eligible for listing in the National Register and to assess the likely impacts of the marina, if constructed, on its significant characteristics. To assist in this effort, Algonquin teamed with Dr. Thomas F. King, the surviving author of the NPA guidance on TCPs (Parker and King 1998), and other relevant literature (e.g. King 2003, 2004), to advise Algonquin’s study and thoroughly review and provide critical comment on the resulting report. Mario Battaglia, the senior report author, is Algonquin’s senior ethnographer and ethnoarchaeologist. He received an M.A. from the University of Arizona, where he worked with several Tribes on TCP identification, evaluation, and nomination. Prior to joining Algonquin in 2017, he directed the Nez Perce Tribe’s Ethnography Program, working to identify TCPs, cultural sites, and other important traditional places affected by federal, state, and other undertakings. Rebecca A. Hawkins (M.A., Anthropology) served as project coordinator and final editor. She also contributed research of existing published and unpublished archival sources to the study and prepared maps for this report.

It should be noted that nomination of the mouth of the Kalamazoo for listing in the National Register was not within the scope of Algonquin's study. A nomination for listing in the National Register would be a separate effort that specifically assessed the characteristics, significance, and integrity of the property, demarcated a clear property boundary, and integrated this information into the National Park Service's *National Register of Historic Places 10-900* nomination form. National Register eligibility is determined following Section 800.4(c)(2) of the Advisory Council on Historic Preservation's Section 106 regulations (36 CFR Part 800) and is a responsibility of the lead federal agency, in this case USACE-Detroit.

Algonquin's study gathered, organized, and researched ethnographic and ethnohistoric information related to the mouth of the Kalamazoo River; this information is summarized in the following report. Based on that research, Algonquin assessed whether the mouth of the Kalamazoo River is a TCP, as defined by the National Register and as described in *National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties* (Parker and King 1998), and under which criterion or criteria it may be eligible (36 CFR 60.4a-d). The manner of this assessment and its findings are discussed below, as is a summary of the likely effects of marina construction.

2.0 The National Historic Preservation Act, Section 106, and TCPs

Federal undertakings and other development projects can affect valued historic, cultural, and archaeological properties, collectively known as historic properties. Recognizing the impacts federal government actions may have upon historic properties, Congress enacted the National Historic Preservation Act (54 U.S.C. 300101 et seq.) of 1966, Section 106 of which resulted in the creation of a process by which federal agencies are required to identify and assess the effects their actions may have upon historic properties. The Advisory Council on Historic Preservation, established by the National Historic Preservation Act, issued regulations to implement and guide the historic property identification and evaluation process. In following these regulations, a federal agency – in consultation with tribes, State Historic Preservation Officers (SHPOs), and other interested parties – identifies historic properties that may be affected by its actions, evaluates them as needed, determines whether and how they will be affected, and seeks to resolve any effects that are adverse.

"Historic Properties" under the National Historic Preservation Act and its implementing regulations are "districts, sites, buildings, structures, and objects significant in American history, architecture, archaeology, engineering, and culture" (54 U.S.C. 302101). Any such property may be eligible for listing in the National Register and thus may be considered under Section 106.

Although TCPs have been found eligible for listing in the National Register since the National Register's inception, questions arising about them in the late 1980s resulted first in issuance of National Park Service guidance in 1990 (Parker and King 1998) and then in the 1992 addition of Section 101(d)(6) to the National Historic Preservation Act, specifying that "properties of traditional religious and cultural importance to an Indian Tribe or Native Hawaiian organization may be determined to be eligible for inclusion on the National Register" (54 U.S.C. 302706).

National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties (Parker and King 1998) outlines ways to identify and describe a TCP. Such a historic property is significant

because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community (Parker and King 1998:1). TCPs draw upon a community's traditions, defined as the

...beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice. The traditional cultural significance of a historic property, then, is significance derived from the role the property plays in a community's historically rooted beliefs, customs, and practices (Parker and King 1998:2).

TCPs can include a great variety of places. The Match-E-Be-Nash-She-Wish Band recognizes as TCPs places that include, but are not limited to: (1) traditional resource gathering areas, (2) areas used for spiritual supplication, ceremony, and sacred activities, (3) legend sites associated with traditional narratives ("mythology"), (4) villages, campsites, and associated trail systems, and (5) traditionally named geographic areas that help define the tribe's ethnohistoric and cultural landscape. These components are regarded by members of the Match-E-Be-Nash-She-Wish Band as contributing elements to a TCP.

Algonquin's study sought to address three questions in sequence:

1. Does the mouth of the Kalamazoo River appear to be a TCP as defined by the National Register;
2. If so, does it appear to be eligible for listing in the National Register; specifically, does it meet any of the four criteria of evaluation, as outlined in 36 CFR 60.4 (a, b, c, d); and
3. If so, what can be said about the likely effects of marina construction that may be helpful to the consulting parties in Section 106 review.

Note that a determination of National Register eligibility does not necessitate that specific actions need to be taken to manage a historic property. A determination of eligibility does not give a site or area any particular or special protections, nor does it affect land ownership in any way. A determination of eligibility simply means that project effects on a historic property must be taken into account in accordance with the consultative procedures set forth in the Advisory Council on Historic Preservation's Section 106 regulations (36 CFR 800.5).

3.0 The Mouth of the Kalamazoo River – Traditional Cultural Property Evaluation

This section presents the findings of the study's analysis regarding whether or not the mouth of the Kalamazoo River (see Figure 1) is a TCP. We then turn to defining any contributing and non-contributing elements that may be associated with the mouth of the Kalamazoo River, as reported by members of the Match-E-Be-Nash-She-Wish Band. The section is followed by one that assesses whether the mouth of the Kalamazoo River is eligible for listing in the National Register, using the four-step process outlined in *National Register Bulletin 38* (Parker and King 1998).

3.1 Landscape and Riverscape Approach

To be considered a TCP, a place must be associated with the "cultural practices or beliefs of a living community that (a) are rooted in that community's history and (b) are important in maintaining the

continuing cultural identity of the community” (Parker and King 1998:1). To assess if mouth of the Kalamazoo is a TCP, we reviewed published and unpublished documents, and considered the contents of oral history interviews.

We concluded that the mouth of the Kalamazoo River would be best evaluated from a “traditional cultural landscape” approach, and specifically as a “riverscape.” Below, we offer some background information about the concepts of cultural landscapes and riverscapes. In order to provide a broader understanding of the evaluation process and of the types of landscapes and riverscapes, we also furnish summaries of a few similar studies in which cultural landscapes and riverscapes have been evaluated as TCPs.

A “cultural landscape” can encompass a broad range of human activities and interactions. Cultural landscapes include, but are certainly not limited to: (1) holy landscapes, (2) storyscapes, (3) regional landscapes, (4) ecoscapes, and (5) landmarks (Stoffle et al. 1997:234). For the National Park Service, a cultural landscape is defined as a “geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person, or that exhibit other cultural or aesthetic values” (Page et al. 1998:12). The National Park Service views cultural landscapes as a cultural resource that can be eligible for inclusion in the National Register (Evans et al. 2001:53).

The National Park Service, in recognition of the importance of cultural landscapes in recent years, has published multiple documents to better identify, record, and ultimately manage cultural landscapes. *A Guide to Cultural Landscape Reports: Contents, Process, and Techniques* (Page et al. 1998:53), for example, introduced the characteristics and features of a cultural landscape, which include: natural systems and features, spatial organization and land use, cultural traditions, cluster arrangement, buildings, views and vistas, topography, vegetation, circulation (trails, roads, canals, etc.), water features, and structures and other objects, small scale features, and archaeological sites. Although useful, the concept of a cultural landscape is included to (over)emphasize the built environment, is more temporally static, and tends not to focus as much on traditional belief systems, cultural practices, and intangible elements.

Ethnographic landscapes, which may simply be a more refined type of cultural landscape (Page et al. 1998:53), contain “a variety of natural and cultural resources that associated people define as heritage resources ... Small plant communities, animals, subsistence grounds, and ceremonial grounds are included” (Page et al. 1998:12). The ethnographic landscape concept is more commonly used outside of the Section 106 framework. An ethnographic landscape is identified and defined via the cultural groups who ascribe value and meaning to the landscape (Evans et al. 2001). Therefore, the idea of an “ethnographic landscape” focuses on an area’s past, present, and future value to a living community, its range of uses, and the overall human-nature interrelationship (Page et al. 1998:28–29; Stoffle et al. 1997:233). Put plainly, they are areas “that have been given special and specific cultural and social meaning by people associated with them” (Evans et al. 2001:53). This concept recognizes that, as those uses change, the landscape alters accordingly; current uses will grow out of past relations between humans and “the land.”

The concept of an ethnographic landscape closely parallels the concept of a TCP. Both concepts work to capture and describe the multivalent, dynamic nature of a place or geographic area, and both recognize

the past significance of a place, along with its ongoing importance to living communities. Although TCPs operate more as a place described and managed within the Section 106 framework, both are useful concepts to employ in understanding a group's connection to place.

Even though TCPs are necessarily geographically bounded, resources and places located outside of a defined TCP boundary are frequently still intrinsically connected to places located within it. Taken holistically, cultural elements found within as well as outside a bounded TCP are often viewed as part of an even larger "traditional cultural landscape" or "traditional cultural riverscape", indicating that the significance of a traditional place does not simply end once a TCP boundary is crossed. Thus, the utility of creating a boundary around a TCP for understanding and evaluating the effects that an undertaking may have upon an area may be irrelevant in an assessment of the larger cultural landscape. Focusing on boundaries also may limit an understanding of the true and wider extent of adverse effects on a landscape. Further discussion of this issue as it pertains to the mouth of the Kalamazoo River may be found in subsection 3.6.

A riverscape as a special kind of cultural landscape is a newer concept and thus has not been considered as often within the National Historic Preservation Act framework. Generally, a riverscape is an area where a river or waterway plays a defining part in a landscape. Riverscapes frequently incorporate not just the waterway itself, but the shorelines and adjacent uplands on either side. A cultural riverscape, then, can be said to include the cultural use-shed and traditional activities associated with the waterway, its riparian margins, and the broader valley through which it flows. As King (2004:4) defined it, a cultural riverscape is "a river and its environs, including their natural and cultural resources, wildlife, and domestic animals, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values." Much like a landscape, a riverscape is dynamic, with often un-defined, temporally shifting, or "fuzzy" boundaries.

TCPs and cultural or ethnographic landscapes and riverscapes can incorporate multiple elements of a community's history and culture into one distinctive "property." They can and often do include a variety of resources (e.g., plant, animal, and mineral), ceremony loci, and associated histories and stories that all serve to highlight the significance of a place and to explain past and inform present practices and beliefs. As Basso (1996:35) notes "people's sense of place, their sense of their tribal past, and their vibrant sense of themselves are inseparably intertwined."

3.2 Example Landscape/Riverscape Approach Projects

Following are brief descriptions of four projects involving the designation of TCPs and determinations of their National Register eligibility using a traditional cultural landscape approach. Certain aspects of each of these projects are similar to the current study of the mouth of the Kalamazoo River. Two of these examples incorporate sections of rivers and other waterways, as well as adjacent terrain, that were slated to be affected by development (e.g., the Heller Bar TCP study in Washington and the Celilo Falls TCP study in Oregon). The other two examples employ the concept of a "riverscape" (e.g., the Lochsa River Corridor TCP study in Idaho and the Klamath Riverscape TCP study in California).

3.2.1 Heller Bar: TCP Study

The Washington State Department of Fish and Wildlife (WDFW) contracted with the Nez Perce Tribe Cultural Resource Program in 2016 to conduct a traditional land use study of Heller Bar and the surrounding ethnographic landscape as part of the Heller Bar boat ramp extension project. The Heller Bar project area is located on the west bank of the Snake River, just north of the mouth of the Grande Ronde River, in southeastern Washington.

The Nez Perce Tribe Cultural Resource Program's traditional land use study determined that the Heller Bar project area is in the middle of the significant Nez Perce village site *'elwitéespe*. The project area is also located in close proximity to multiple Nez Perce burials, identified through ethnographic accounts and from a 1917 Corps of Engineers survey map. Numerous other Nez Perce village sites and cultural places are located near the proposed Heller Bar boat ramp extension and together create an interconnected traditional cultural landscape. The ethnographic study determined that the identified cultural resources formed a TCP that is directly associated with, and encompasses, the proposed Heller Bar project area. The CRP also found that the TCP is eligible under criteria a, b, and d, as codified in 36 CFR 60 of the National Register of Historic Places regulations, and as described in *National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties* (Parker and King 1998). The CRP identified a number of project impacts that would adversely affect the TCP, including ongoing use of the boat ramp, which likely would see increased boat traffic if the proposed ramp extension were constructed. The CRP recommended mitigation of these adverse effects (Battaglia et al 2017).

3.2.2 Celilo Falls: TCP Study

Beginning in 2014 the U.S. Army Corps of Engineers Portland District (USACE-Portland) and the Bonneville Power Administration (BPA) proposed conducting determinations of National Register eligibility for Nez Perce TCPS and other cultural sites associated with the operations and maintenance of the dams found in the Columbia River System waterway. Activities in the USACE-Portland's *Performance Work Statement* included compiling ethnographic information about Nez Perce land use and defining Nez Perce legend sites and other TCPs associated with the Columbia River.

In 2015, the Corps contracted with the Nez Perce Tribe Cultural Resource Program to conduct the study that focused on compiling cultural, historic, and ethnographic information to define sites and determine their eligibility. For the study, the Cultural Resource Program synthesized archival materials, ethnographies, tribal histories, and published as well as unpublished documents available at universities, local historical societies, and the National Archives in Seattle for this work. Over 25 sites were identified along the stretch of the Columbia River that included the Bonneville, The Dalles, and the John Day locks and dams. These sites are currently being formally evaluated for listing in the National Register of Historic Places (Battaglia 2016).

3.2.3 First Salmon: Klamath Riverscape

A 2004 study was conducted by Tom King on behalf of the Yurok, Karuk, and Shasta tribes to understand the cultural significance of the Klamath Riverscape: an area that included the Klamath River and its immediate surroundings. The study investigated the merit and utility of defining the Klamath River as a

Traditional Cultural “Riverscape,” finding that this concept best fits the indigenous use and understanding of the area. The study determined that the Klamath Riverscape was eligible under National Register eligibility criterion a, and likely eligible under criteria b and d. Additionally, the study considered the effects of the Klamath Hydroelectric Project on the Klamath riverscape, with the subsequent report concluding that:

there is a complex pattern of cumulative adverse effects, caused by multiple factors, to which the hydroelectric project contributes. Effects include obstructions to fish passage, alterations in water quality, quantity, temperature, and flow regime that affect fish, plant life, habitat, and human use of the river, and erosion of significant cultural sites [King 2004:1].

Ultimately, the study’s report recommended that the Federal Energy Regulatory Commission seriously consider not relicensing the Klamath Hydroelectric Project, or to relicense it only under certain conditions, such as requiring the removal of the facilities that contribute the most to ongoing adverse impacts.

3.2.4 Lochsa River TCP Study and Nomination

In 2013, the Nez Perce-Clearwater National Forest initiated consultation in order to identify and evaluate Nez Perce values and places associated with U.S. Highway 12 and the Lochsa River Corridor. During this consultation process, the Nez Perce Tribe petitioned the Forest Service to both evaluate the Lochsa River Corridor as a TCP and make a formal determination of its eligibility for listing in the National Register of Historic Places. An ensuing comprehensive traditional land use study established that the Lochsa River Corridor was a Nez Perce TCP.

The Lochsa River Corridor TCP is located entirely within the lands traditionally occupied and used by the Nez Perce Tribe. Although some development that had adverse impacts to the property had occurred in certain locations within the Lochsa River Corridor (i.e., U.S. Highway 12), the overall integrity of the TCP remained intact in the eyes of the Nez Perce people. The corridor continued to be an important and heavily-used landscape intimately connected to the past, present, and anticipated future activities and lifeways of the Nez Perce people. Consultants interviewed during the study noted, however, that further development would likely result in cumulative adverse effects that would impede traditional activities and traditional use of the area, as well as negatively impose upon the natural soundscapes and viewsheds found there. The study determined that such development and damage to this dynamic landscape would negatively and irreversibly impact essential landscape characteristics important to the Nez Perce Tribe, and be detrimental to their health, wellbeing, and livelihood.

The Lochsa River Corridor TCP incorporated culturally important and significant places, including: waypoints, pilot points, landforms, and landmarks; gathering, hunting, and fishing sites; water sources used for cleansing, drinking, and rituals; prehistoric village sites; past and present campgrounds; named aboriginal places; legend sites; birth places and burial grounds; and areas used for spiritual and ceremonial activity. Each of these many contributing elements hold various levels of historic and contemporary significance to the Nez Perce people and are essential for the perpetuation of Nez Perce society, culture, and identity. Factoring these elements into their considerations, the CRP determined that the Lochsa River Corridor TCP was eligible for listing in the National Register under criteria a, b, c(4), and d in accordance

with the codified language in 36 CFR 60.4 of the National Historic Preservation regulations and the guidelines put forth in *National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties* (Parker and King 1998).

Overall, the study concluded that the Lochsa River Corridor (or Lochsa Riverscape) remains integral to the traditional economy, identity, and worldview of the Nez Perce people, whose present practices are informed by past knowledge (Battaglia et al. 2015).

3.3 The TCP Identification and Documentation Process

As noted above in subsection 3.1, TCPs are associated with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community (Parker and King 1998:1). Because of their strong connection to a living community, TCPs are best identified by consulting directly with the community that ascribes value to that particular geographic area. Members of the traditional community often have unique knowledge and experiences that directly relate to the significance of the property in question.

Although publications, archival maps, "gray literature" archaeological reports, and various other ethnographic materials such as interview transcripts can contribute toward the identification and documentation of a TCP, it is frequently only within the community itself where the knowledge of a property resides. Oral traditions, historically-rooted beliefs and worldviews, traditional customs, cultural practices, and other activities about or connected to a place are frequently only identified and fully understood by community members. In many cases, information about a place is not widely known or even documented outside of the community, and if it is, such information may be limited and may not accurately capture the depth and dynamics of the place, resources, or relationships.

For American Indian Tribes in particular, a cultural tradition of oral history and not written history has preserved traditional knowledge within the community rather than within texts and publications, although some texts and publications may exist and can complement research within the community. Knowledge about a traditional place may be known by tribal elders, traditional practitioners, and other community members who are connected to the place in question. These community members often can speak expertly on the nature and characteristics of a place, and can more fully express the community's long term relationships to the place. Identifying and fully documenting a TCP, therefore, involves interviews, consultations, and other interactions with these members within the traditional community, as well as a review of information available in available documentary sources.

The characteristics of the mouth of the Kalamazoo River and the long-term relationships of the Match-E-Be-Nash-She-Wish Band with that area that they designate as the mouth (Figure 1) are enumerated and discussed further in the following subsection. These characteristics and relationships are examined as "contributing elements", i.e., as parts of a larger whole that add to the integrity or other qualities of that larger whole as a distinct and significant place. Identifying contributing elements is an important step in determining if an area is, in fact, a TCP.

3.4 Contributing Elements of the Mouth of the Kalamazoo River

Algonquin's research included gathering, examining, and synthesizing information from archival maps, published and unpublished reference materials, and interview transcripts, as well as in-person discussions with Match-E-Be-Nash-She-Wish Band tribal members and the Band's Tribal Historic Preservation Officer (THPO), Lakota Pochedley, and other tribal staff in Shelbyville, Michigan. Analysis of gathered materials began by identifying the contributing elements outlined below that are associated with the mouth of the Kalamazoo River (Figure 1).

As noted in the preceding subsection, a cultural landscape is defined by the National Park Service as "a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values" (*Preservation Brief* 36; found at <https://www.nps.gov/tps/how-to-preserve/briefs/36-cultural-landscapes.htm>). Similarly, as also noted above, Page et al (1998:12) discuss the fact that cultural landscapes often contain "small plant communities, animals, subsistence grounds, and ceremonial grounds." These elements not only contribute to a landscape's National Register eligibility, but may be "cultural resources" in their own right under NEPA (see 40 CFR 1508.8 and also Section 5.0 of this report).

Taking a cultural landscape approach, the ethnographic study identified multiple cultural resources – contributing elements – that are important to the Match-E-Be-Nash-She-Wish Band and are associated with and contribute to the significance of the mouth of the Kalamazoo River, including *nmé* (lake sturgeon), suckers, *mnomen* (wild rice), black and other ash, birch, maple, reeds, cattails, and various other plants, and also animals that are culturally significant elements that are known and understood through tribal stories, oral histories, clan relationships, and ongoing cultural practices.

One interviewee from the Match-E-Be-Nash-She-Wish Band, "SM", notes many of these resources when she speaks of the Kalamazoo River, and includes a reference to a burial site of one of her relatives near the mouth of the River:

I can go back and trace where my great-great-great grandfather was buried [undisclosed location along] the Kalamazoo River at one of those bluffs where [name withheld] Creek empties into the Kalamazoo River. He died there when he was hiding, he, and his family, and members of his band were hiding out from the encroaching people, white people, coming here because they were going to remove them if they saw them, so they went out to the Allegan State Forest and right along the Kalamazoo River. All of that sacred river that nourished us and fed us and provided food, not only fish, but other sources of food that we knew grew along the river. They knew where the wild rice and everything was. They used a lot of the seaweed and the plants that grow in the river to eat, so it was more than fish and muskrats and beaver, it was a lifeline because in the summer, spring, and fall, they would also use the river to gather black ash to make their tools with, their baskets with, what they needed because baskets wore out a lot in those days because they used the baskets daily and in some instances they would conk out after two, three years. So there was always a lot of re-building. They used a lot of the black ash mats in their lodging that they would weave into mats along with [cattails]. Everybody think it was only cattails, but it was also black ash. Everything was so prolific along the river and of course we used it for

traveling, going upriver and out into the lake, so that's what they were doing there. They were hiding out and when it came time for the sturgeon to start...when they came upriver to spawn, they knew that because they were living right there on the banks, so they could see them. And where [REDACTED] runs into the river, it creates a great, big, long sandbar that goes almost halfway across the river at that point. That's where they would go out and stand there to spear enough sturgeon that they could dry and preserve. So they weren't spearing every Sturgeon nearby...they knew how much they needed.

The contributing elements noted in SM's narrative and other cultural resources, as well as their connections to the mouth of the Kalamazoo River specifically, are further described below.

3.4.1 Lake Sturgeon

Lake sturgeon (*Acipenser fulvescens*), known as *nmé* by the Match-E-Be-Nash-She-Wish Band, is the premiere fish of the contemporary Fish Clan, indicating its ongoing importance as a cultural resource. The Match-E-Be-Nash-She-Wish Band has historically maintained a strong relationship with *nmé*, as the *Nmé Dodem*, Sturgeon Clan, was one of the original clans of the Pottawatomi:

the mythological clan ancestor—the original Bear or Bald Eagle or Sturgeon who, according to the clan's origin myth, had dreamed the special power needed to create the clan; it was also the name of the clan's symbolic representations, the emblems that marked the clan's identity...The key to understanding Potawatomi clans is the fact that they are genealogically thick—they reached back in time to long deceased ancestors and down in time to generations yet unborn, and they were wide—they stretched beyond the immediate and even the extended family (Clifton 1984:10).

For millennia, lake sturgeon have been an important dietary staple. Faunal analyses of archaeological sites in southwestern Michigan have demonstrated an intensive use of lake sturgeon by indigenous peoples beginning in the Early Woodland Period, who developed a “unique regional fishery that targeted lake surgeon during their spring spawning runs, and this became a significant factor in subsequent settlement systems” (Martin 2008:61–72). Multiple archaeological sites dated to ca. 1420 AD include a considerable amount of sturgeon bones uncovered along the Kalamazoo River Watershed (Walz 1991; Wesley 2005). Barr (1979) and Higgins (1980) both note that sturgeon bones were abundant in the Kalamazoo River area as well, suggesting that the mouth and lower river segments were used for spring fishing by local residents and as spawning grounds for the fish.

In a statement made in the *Match-E-Be-Nash-She-Wish Band Climate Change Adaptation Plan* (2015:5-6), Punkin Shananaquet (Match-E-Be-Nash-She-Wish Band member) spoke of the importance of sturgeon for her people:

Sturgeon were another source of subsistence for native people in the watershed as they moved from the big lake up the river. It was at one of these camps that my great-great-great-great grandfather became ill and died while spearing sturgeon. The people wrapped him in birch bark and placed him in a cliff along the Kalamazoo River so that his final resting place would not be disturbed by the Whiteman. This story has been handed down in oral tradition from one generation to another. My mother told it to

me as part of the reason why I would be fasting at this particular place along the Kalamazoo River. My four-day 'berry fast' occurred when I was fourteen years of age in 1975. I offer this story as but one example among many within the history of my people an example of the spiritual significance along with oral traditions that ties me and my people to the land and Kalamazoo River forever.

On another occasion, Punkin provided further information about the cultural significance of sturgeon:

The "Nme'" or Sturgeon Clan is referred to as the Ogema or Chief Clan of the fish pantheon w/Turtle also holding the title of Chief or "King". The Fish Clan people or Water Clans as they are often referred are considered the philosophers and spiritualists; those who interpret and provide spiritual knowledge and guidance. Colors for the clan are animate meaning they move and provide life is Blue, Green and Silver. Fish Clan people are often regarded as mediators in tribal disputes with their word and/or decisions being final. We observed upon thousands of generations the existence of the fish and how important of a role they have with the water, the lakes, the creeks and streams. The survival of water is critical with the inhabitants of those who live within that environment. Like the life of the fish, Sturgeon Clan people often survive to an old age and before the arrival of the European the life span of our people easily reached 130 years.

Match-E-Be-Nash-She-Wish Band members view sturgeon as their revered grandmothers and grandfathers and less as simply an exploitable resource and more as relatives or Animal Kin, a concept nearly ubiquitous in American Indian worldviews. Within this worldview, Animal Kin or "Animal People" are treated as relatives and sometimes bestowed with spiritual or supernatural power and insight. In many cases, Animal People acted and influenced the early ethnogenesis and histories of native peoples. Because of this, lake sturgeon can be viewed as historical figures that are significant in the past and present of Pottawatomini livelihood. For the Match-E-Be-Nash-She-Wish Band specifically, lake sturgeon act as spiritual advisors and mediators for the tribe and are considered as elders with inherent wisdom. Reintroduction and rehabilitation of lake sturgeon is therefore critical to the wellbeing of tribal members and maintains a vital connection to their animal relatives (Gun Lake Tribe 2017).

Because of the historical pressures placed upon lake sturgeon, their reintroduction and rehabilitation is especially critical. The US Fish and Wildlife Service (USFWS n.d.) noted that:

Great Lakes sturgeon declined dramatically in the late 1800s from overfishing, pollution and habitat loss. Though many populations were extirpated long ago, sturgeons still persisting in at least 8 rivers around Lake Michigan at a small fraction of their historic abundance. Once depleted, it is often difficult for sturgeon to recover because the survival rate of young fish is poor and it takes them many years to mature.

Match-E-Be-Nash-She-Wish Band staff member, JL, during an interview for this study, spoke of the importance of maintaining sturgeon populations in the Kalamazoo River:

Minimum Viable Population (MVP) is the number of individuals needed in a population to continue its existence in the wild. Falling below MVP could mean the population

trajectory is heading towards extinction and there may not be enough individuals to contribute to the genetic diversity to stop extinction of the population. Kalamazoo population was estimated at 88 individuals during last population estimate by Michigan DNR. MVP has been set for lake sturgeon at 80 spawning individuals. Lake sturgeon show high site fidelity to where they were born, so each tributary to the Great Lakes that harbors spawning lake sturgeon in the spring have unique populations. Even though they may mix together during non-spawning times it has been shown that they will return to their respective rivers when ready to spawn. The Kalamazoo River lake sturgeon population has been linked to be most closely related to Grand River and Muskegon River lake sturgeon populations, but genetics work has shown that Kalamazoo River lake sturgeon are distinct from other populations of lake sturgeon that inhabit Lake Michigan.

Fishing for sturgeon and other species of fish occurs with regularity near the mouth of the Kalamazoo River, as one interviewed Band member, LS, noted:

We did fish in Lake Michigan off the piers near the mouths of the Kalamazoo and Grand Rivers. Saugatuck and Grand Haven, Muskegon also. Walleye, Perch, Lake Trout, then later we started to catch salmon. I did not like the way the Salmon tasted. I also knew that the Salmon were taking over the Lake Trout and Whitefish feeding areas and habitat.

The importance of lake sturgeon within tribal culture would be difficult to overstate, and current efforts by the Match-E-Be-Nash-She-Wish Band to rehabilitate lake sturgeon in the Kalamazoo River and other Michigan waterways serves to underscore this significance. Consequently, many tribal members have expressed concerns to Match-E-Be-Nash-She-Wish Band staff and leadership about the negative impacts the proposed North Shores marina will have upon this resource. These tribal members assert that activities associated with the marina, particularly any and all boating, will likely adversely affect this important cultural resource (see section 6.0 for a discussion of adverse effects).

3.4.2 Suckers

In a statement in the *Match-E-Be-Nash-She-Wish Band Climate Change Adaptation Plan* (2015:5), Punkin Shananaquet (Match-E-Be-Nash-She-Wish Band member) spoke of the importance of suckers:

One of our moons is referred to as Namebini Giizis or "Sucker Moon," known in the English language as February. Suckers would move upstream to spawn and our people would gather to harvest the fish as they moved inland. Entire families would gather and reconnect at various times throughout the year when we depended on one another to assist by means of spearing, cleaning, or preserving and smoking the fish.

3.4.3 Wild Rice

Wild rice, known to the Pottawatomi as *mnomen* (also spelled *manoomin*), is another cultural resource directly connected to the mouth of the Kalamazoo River and the surrounding area. Wild rice was a staple in local diets for millennia, fully integrated into feasts and celebrations as well as daily subsistence. Barton, in her book about the history of wild rice in Michigan, includes several maps that show the importance of

the mouth of the Kalamazoo River both to early gatherers of wild rice – she notes 212 historically documented wild rice stands in Michigan (Figure 3).

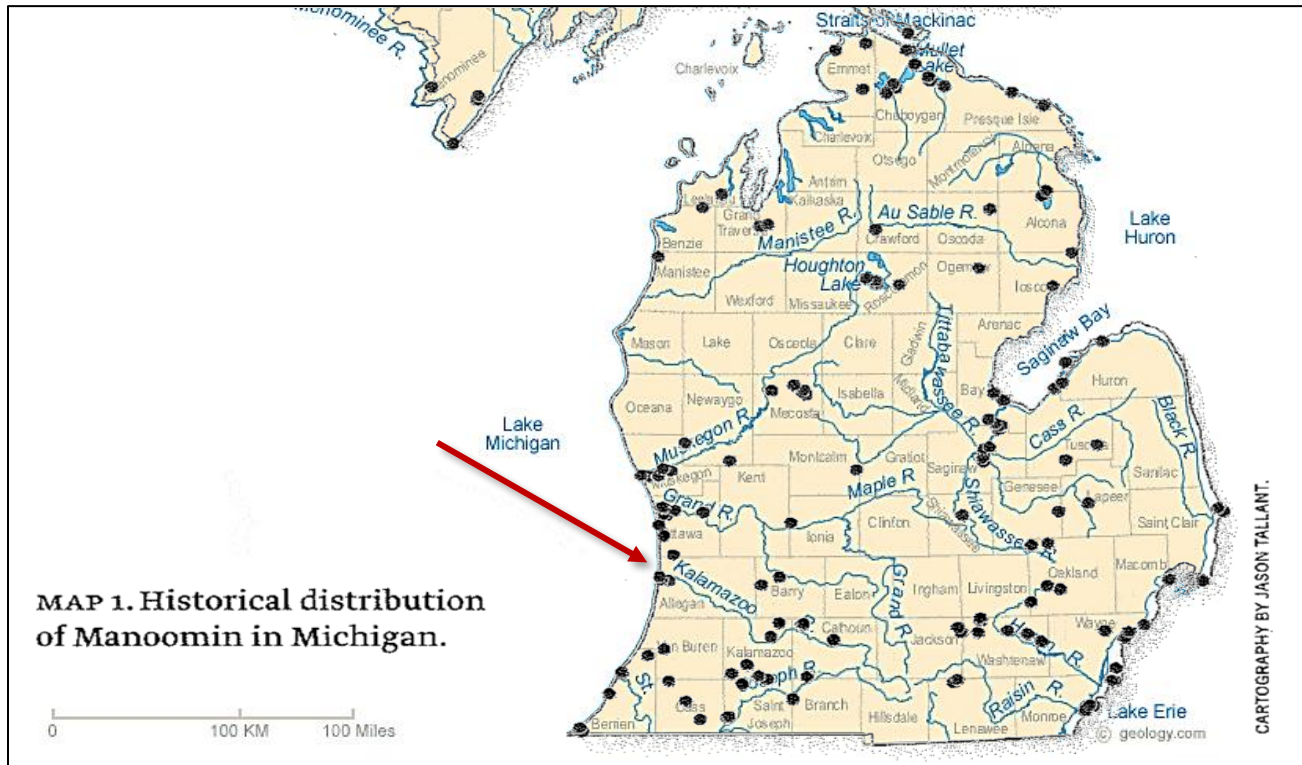


Figure 3: Historical distribution of wild rice gathering areas in southern Michigan, drafted from an overlay of Barton’s Map 1 (2018:28) on a Geology.com map of Michigan rivers. The arrow references the location of the area around the mouth of the Kalamazoo River. North is to the top.

Wild rice is, in fact, the featured food in the Pottawatomi origin story that tells of how they came to be in the location where they reside today:

The significance of Manoomin comes from our people’s migration story. Thousands of years ago, the Anishinaabe lived on the east coastline of Turtle Island (North America). They were visited by eight prophets and were given seven prophecies to follow. The third of these prophecies instructed the Anishinaabe to travel westward until they found a place where “food grows on the water”. When they arrived in the Great Lakes Region, they discovered vast beds of wild rice. This is the area our people have lived and thrived ever since, because of Manoomin [Gun Lake Tribe 2017].

Figure 4 shows wild rice and cattails located at the River’s mouth, as well as Indian trails in the adjacent virgin forest; this map, produced by a local artist, embodies a broad community knowledge of current

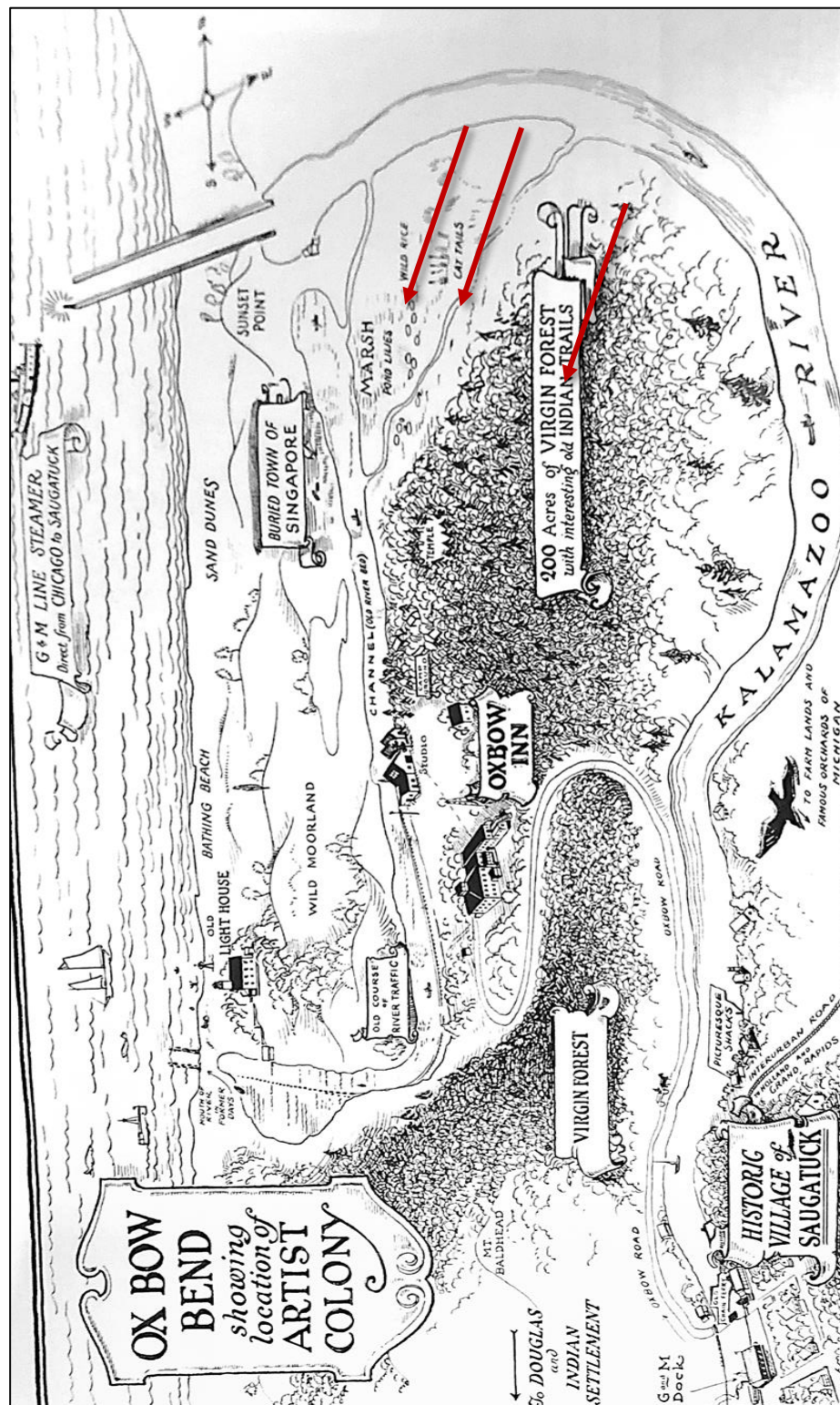


Figure 4: Artist's rendition of the mouth of the Kalamazoo River; arrows added to note wild rice and cattails, as well as Indian Trails (Anthrop 2009:25) . North is to the left.

Indian use of the area. Discussion of the trail network around the mouth of the Kalamazoo is discussed in more detail below in subsection 3.7.3.

3.4.4 Running Water (“Wild Water”) and Rapids (Boiling Rapids)

Water is an important contributing element of the mouth of the Kalamazoo River. Water largely defines the mouth physically and supports the sturgeon, wild rice, and other resources that depend on it. Ensuring that the river remains unpolluted so that these resources remain unimpacted is critical to the Match-E-Be-Nash-She-Wish Band. In the *Match-E-Be-Nash-She-Wish Band Climate Change Adaptation Plan* (2015:5), Punkin Shananaquet (a Match-E-Be-Nash-She-Wish Band member) spoke of the importance of water and waterways, particularly the Kalamazoo River:

The Kalamazoo River has always been and remains today a source of spiritual power for the Potawatomi of Southwest Michigan. The water is one of four main spirits that we acknowledge when offering prayers and medicine bundles for healing. The Kalamazoo River was one of the main sources for sustenance for the Potawatomi people in earlier times. We recognize the sacred balance the rivers, lakes, and streams provide by referring to them as the lifeblood of Mother Earth.

3.4.5 Pine, Birch, and Black Ash

Places where pine, birch, black ash, and other tree species meet water are significant to the Match-E-Be-Nash-She-Wish Band, as indicated briefly during an interview with, SM, a Match-E-Be-Nash-She-Wish Band member:

Everything occurred there [the places where rivers, lakes, and forest would meet], our people from around Anishinaabe country all knew where these places were. We didn’t have a road map to know, we knew, our people knew this.

The mouth of the Kalamazoo River is one such place where forest, lake, and river meet. Birch and black ash bark remain important resources used by the Match-E-Be-Nash-She-Wish Band, and frequently collected along the Kalamazoo River, including at the mouth. Band member SM described the collection of black ash bark along the Kalamazoo:

And my mom would go out to [REDACTED] all the time when we used to live by [REDACTED] [REDACTED] and go get her black ash. She would single-handedly go out and get it and get a small log and be able to get it out because she would pound her own black ash sometimes too.

3.4.6 Reeds / Cattails

Reeds are collected to weave into mats, and to make rush-mat lodges. This traditional practice is described in one of the Pottawatomi’s origin stories (Skinner 1927:333). Cattails have been identified in several locations at the river’s mouth, and the practice of gathering cattails continues today, as noted in several of the interviews conducted for this study.

3.5 Non-contributing Elements

Not everything within the area considered to be the “mouth of the Kalamazoo River” (see Figure 1) contributes to the distinctness or the cultural significance of the area to the Match-E-Be-Nash-She-Wish Band. Although it is likely that many non-contributing elements exist in the vicinity of the mouth of the Kalamazoo River, it is beyond the scope of this study to list them all. These non-contributing elements include various modern buildings and structures, signage, and roads, among a great many other objects and features.

3.6 Suggested Property Boundary

Based on both the identification of the contributing elements presented above, and its physical distinctness (i.e., a river mouth) the mouth of the Kalamazoo River (see Figure 1) can be said to be a unique place separate from, although still undeniably connected to, the rest of the Kalamazoo River and riverscape. The mouth, in the Match-E-Be-Nash-She-Wish Band world view, is roughly bounded by Ottawa Marsh on the east and where it carries the Kalamazoo River out into Lake Michigan on the west. This sense of the mouth derives from physical characteristics of the River (Figures 5 and 6) as well as traditional land use and cultural concepts

The current study indicates that, although the channel’s opening into Lake Michigan was relocated, it was relocated within the area of historic use and occupancy thought of by the Match-E-Be-Nash-She-Wish Band as the “mouth of the Kalamazoo River.” Band members spoke of “the mouth” as an area that extended beyond the shoreline and included areas of resource procurement, ceremonial gatherings, and other traditional activities, such as burial, that also encompassed the area where the “new” channel is located. Further, lake sturgeon, arguably one of the biggest contributing resources or elements connected to the mouth, continue to move through the “new” channel to spawn upriver and to return to Lake Michigan, much as they have always done. Match-E-Be-Nash-She-Wish Band members continue to think of the “new” channel as they did the “old” channel, viewing the passage of sturgeon from the Lake into the River’s mouth as a major contributing component to the property’s significance. In addition, the “new” channel, being more than 50 years old, technically could be considered separately from the “old” mouth in an analysis of TCP status and National Register eligibility. That being said, this study’s analysis of the area known as the “mouth of the Kalamazoo River” considers the mouth as that geographic area viewed and understood by the Match-E-Be-Nash-She-Wish Band and as shown in Figure 1, above, and Figures 5 and 6.

Based on the ethnographic information collected from published and unpublished source material and the interviews with tribal members, the “mouth of the Kalamazoo River” site encompasses:

- the village sites (both archeological and ethnographic) on either side of the old mouth,
- burial areas (both historically documented and ethnographic)
- gathering areas for wild rice, cattails, birch and pine, black ash and other ash along the shoreline and adjacent riparian areas,
- the actual waterway and adjacent terrain extending upriver to Ottawa Marsh, and downriver into its outflow into Lake Michigan.



Figure 5: General Land Office plat maps of part of mouth of Kalamazoo River, showing the broad channel and marshy areas up as far as the confluence with the Rabbit River, the mouth's eastern boundary. Note the original channel opening into Lake Michigan at the mouth's western boundary. Figure drafted from the Township 3 North, Range 16 West plat on left and Township 3 North, Range 15 West plat on right; the match is imperfect. Sections are 1.0 mi on a side. Surveys for these plats were performed in 1831 (Range 16 West) and 1832 (Range 15 West). North is to the top.

Archaeological evidence and ethnographic sources indicate that the historic use and occupancy around the "old" mouth of the Kalamazoo River encompasses a large area that includes the more recently relocated mouth. Traditional activities of the two village locations (to the north and south of the mouth circa 1810-1830) included gathering, hunting, fishing, and traditional activities that broadly used the adjacent areas (Kidorf et al. 2010; Walz 2017).

Based on these characteristics, the site or property known by the Match-E-Be-Nash-She-Wish Band as "the mouth of the Kalamazoo River" can be defined as the area mapped in Figure 1, above, and Figure 6. Although it is possible that a more refined boundary could be established, at this present time, the Match-E-Be-Nash-She-Wish Band considers the property to include both the old and new mouths of the River, as well as all the site components listed in the preceding paragraph. If, to better identify adverse effects, a

more refined and delineated boundary is needed, it is recommended that close consultation with the Match-E-Be-Nash-She-Wish Band be conducted for a more refined boundary determination. Otherwise, because of the inherent arbitrary nature of determining a TCP boundary in a great many cases, the boundary suggested for the mouth of the Kalamazoo, as presented here, is that area that includes all the key contributing elements and known historic land uses that have been identified by the Match-E-Be-Nash-She-Wish Band at this time.

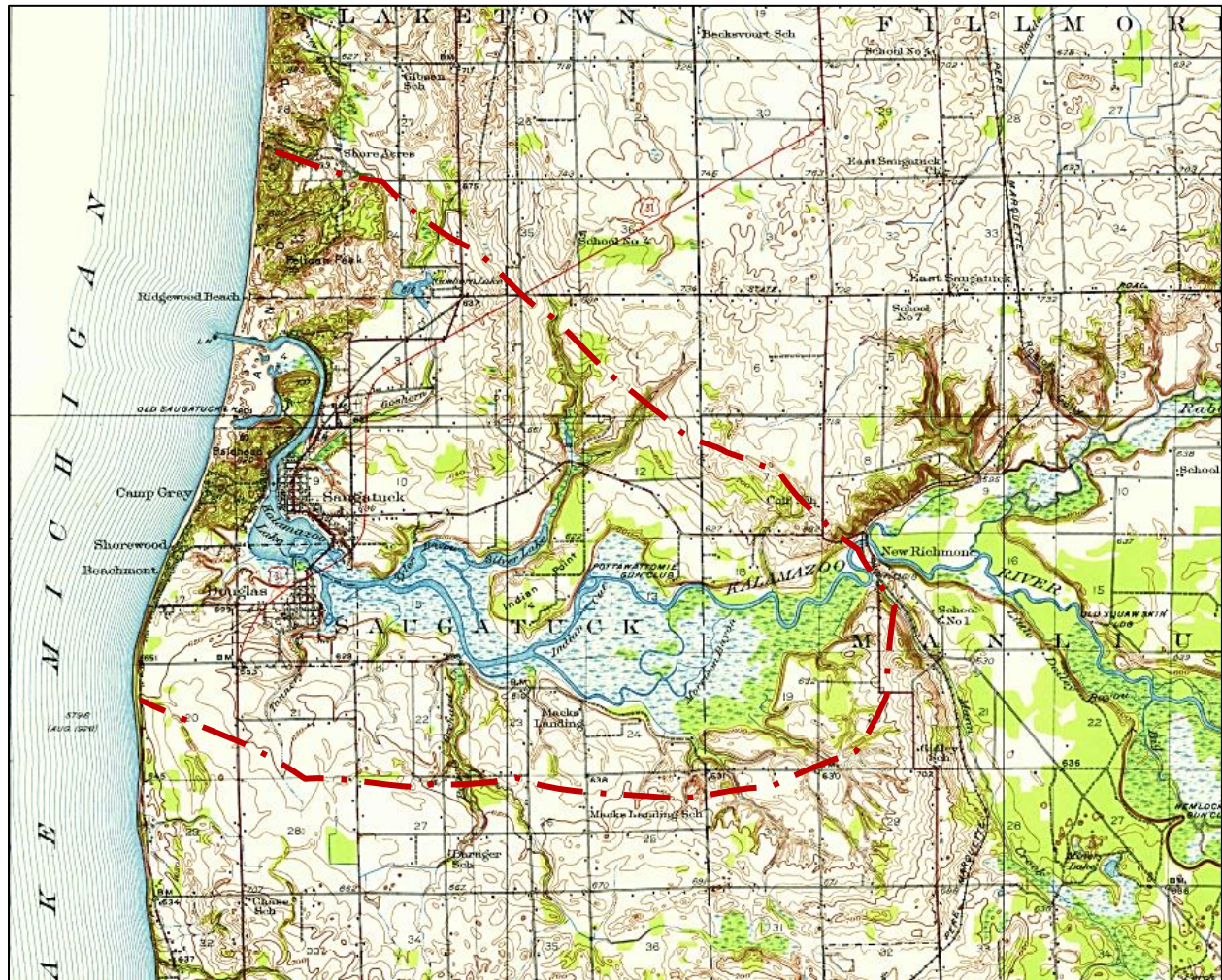


Figure 6: Generalized boundary of the mouth of the Kalamazoo TCP (red dashed outline). Figure drafted on USGS 1:62,500 Fennville topo map (1928). Map shows the broad channel and marshy areas up as far as the confluence with the Rabbit River/Ottawa Marsh, the mouth's eastern boundary. Note the original channel and the new channel opening into Lake Michigan at the mouth's western boundary. Contour interval is 10 ft, sections are 1.0 mi on a side. North is to the top.

3.7 Assessment of the Traditional Cultural Significance of the Mouth of the Kalamazoo River

Members of the Match-E-Be-Nash-She-Wish Band of Pottawatomi Indians of Michigan, also called the Gun Lake Tribe, have lived in the Great Lakes region for millennia. The Pottawatomi were first encountered by Jean Nicolet in the western Great Lakes, when their territory encompassed lands south of Mackinaw and stretched along the eastern shore of Lake Michigan to the western shores of Lake Huron. However, by the mid-1600s, the Iroquois began moving into their territory, pushing the Pottawatomi north across the Straits of Mackinaw. During this time, the Pottawatomi established temporary encampments around the Straits of Mackinaw. They then began reclaiming territory further southwest in the upper peninsula of Michigan and northeastern Wisconsin along the shores of Green Bay and the Door Peninsula, and then even further south into northern Illinois, Indiana, and southern Michigan (Clifton 1986; Edmunds 1978; Winger 1939).

By 1641, “the Potawatomi had developed several distinctive cultural patterns and social institutions that set them apart from neighboring and kindred societies ... they were masters of framed-up bark canoe technology and long distance transportation by waterway” (Clifton 1984:2). Notably, these distinctive cultural patterns and social institutions related to navigation and canoeing continue within the Match-E-Be-Nash-She-Wish Band today and are frequently referenced in association with the names of people and organizations. For example, the Citizen Band Potawatomi, who are descendants of the removed St. Joseph Potawatomi, refer to themselves as Shishibaniyek, a reference to their navigational prowess and deep understanding of waterways (personal correspondence 2019, LP and KJM, Citizen Band members).

Around 1680, the Pottawatomi had moved into the Lake Michigan region in such great numbers, that “they soon spread over a vast area stretching from the vicinity of Chicago northward to the mouth of the Kalamazoo River, eastward to include the headwaters of the Grand River, and southward into Indiana and Illinois” (Buechner 1933:290).

Close to a century later, in 1795, members of the Ottawa, Potawatomi, and Ojibway groups – groups who spoke similar dialects of the same Algonquian language and shared many cultural beliefs – were acknowledged by the U.S. government as the Three Fires Confederacy. The Three Fires Confederacy was under the leadership of several Ogemak (chiefs), including Chief Match-E-Be-Nash-She-Wish, who signed the Treaty of Greenville (Clifton et al. 1986:v). By the early 19th century, the Chief’s Band occupied much of the Kalamazoo River Valley. The Band’s primary village was located at the head of the Kalamazoo River, with other villages extending down to the river’s mouth.

Several decades later, in 1821, Chief Match-E-Be-Nash-She-Wish signed the Treaty of Chicago, which was the first land cession to the U.S. government directly affecting his Band. Under the terms laid out in this Treaty, the Tribe retained a three-square-mile reservation located at present day downtown Kalamazoo. Just a few years later, in 1827, the U.S. and the Pottawatomi tribes signed another treaty, the Treaty of St. Joseph. Under the terms of this new treaty, the Chief ceded rights to the Kalamazoo reserve granted under the 1821 treaty. Notably, neither payment nor land was ever provided to the Chief’s Band (Gun Lake Tribe 2017).

The era after these treaties were signed was marked by the Band’s constant movement northward to avoid forced removal out west. As a result, the Band briefly settled in Cooper, then Plainwell, and then

Martin before permanently settling ca. 1838 in Bradley, near Gun Lake and the Kalamazoo River, where they reside today (Gun Lake Tribe 2017). Despite these migrations and early efforts aimed at their removal, the Match-E-Be-Nash-She-Wish Band persevered, continuing relationships and connections to the Kalamazoo River established by their ancestors.

The importance of the Kalamazoo River is underscored by a history of Pottawatomi groups fighting hard to retain their connection to the area. Clifton et al. (1986:64) noted that:

And then there were the Potawatomi who by one means or another remained near their old villages and cornfields in southwestern Michigan. Some of them took temporary refuge in out-of-the way places, the marshes along the lower Galien River in Berrien County, for example, or the isolated headwaters of the Kalamazoo River. But there were others, the Catholic Potawatomi, generally known as the Pokagons who had in their hands the hard-won treaty right to remain where they were. They exercised this right successfully, not by escape or evasion, but by direct confrontation and negotiation with American authorities.

3.7.1 Connection to Historical Figures and Potawatomi History

The Kalamazoo watershed, from the headwaters down to the river's mouth, is an immensely important area for Pottawatomi people, who know the name of the River as *Kekamzoo Zibe*, which refers to swift water or rapids. Similarly, Clifton et al. (1986:58) noted that the word "Kalamazoo" likely derives from the Pottawatomi word *kekalamazoo* meaning 'boiling pot,' a likely reference to the bubbly, frothy nature of rapids (Figure 7).

According to JSW, a Pokagon Pottawatomi Band member interviewed for this study, the mouth of the Kalamazoo River:

is named zagitek because the area around that specific river mouth is of particular importance. Additionally, I know the location of a crooked tree, in my estimation at least 150 years old, on the south side of the river, high up in the dunes. It's an old giant. It points directly to the area known to be the location of the old Odawa/Potawatomi burial grounds [2019, personal communication].

Additional names associated with the mouth of the Kalamazoo River include Leopold Pokagon's (Figure 6) – his Pottawatomi name, *sakiwnik* (alternatively spelled *zakiwnik* or *sakekwinik*) means "man of the outlet of the river (2019, personal communication, KM Pokagon Band member). Similarly, Clifton et al. (1986:46) noted that the name Zagitek (or Sakekwinik) means "river's mouth". Pokagon's Anishnabe name, *sakiwnik*, which was eventually corrupted to Saugatuck, is significant to Match-E-Be-Nash-She-Wish Band members and members of other Pottawatomi tribes affiliated with southwest Michigan, who directly connect this prominent leader and historical figure to the mouth of the Kalamazoo River. Historically, the area around the Kalamazoo River was where the Ottawa, Potawatomi, and Ojibway members of the Three Fires Confederacy had established their villages (e.g., Figures 9 and 10).

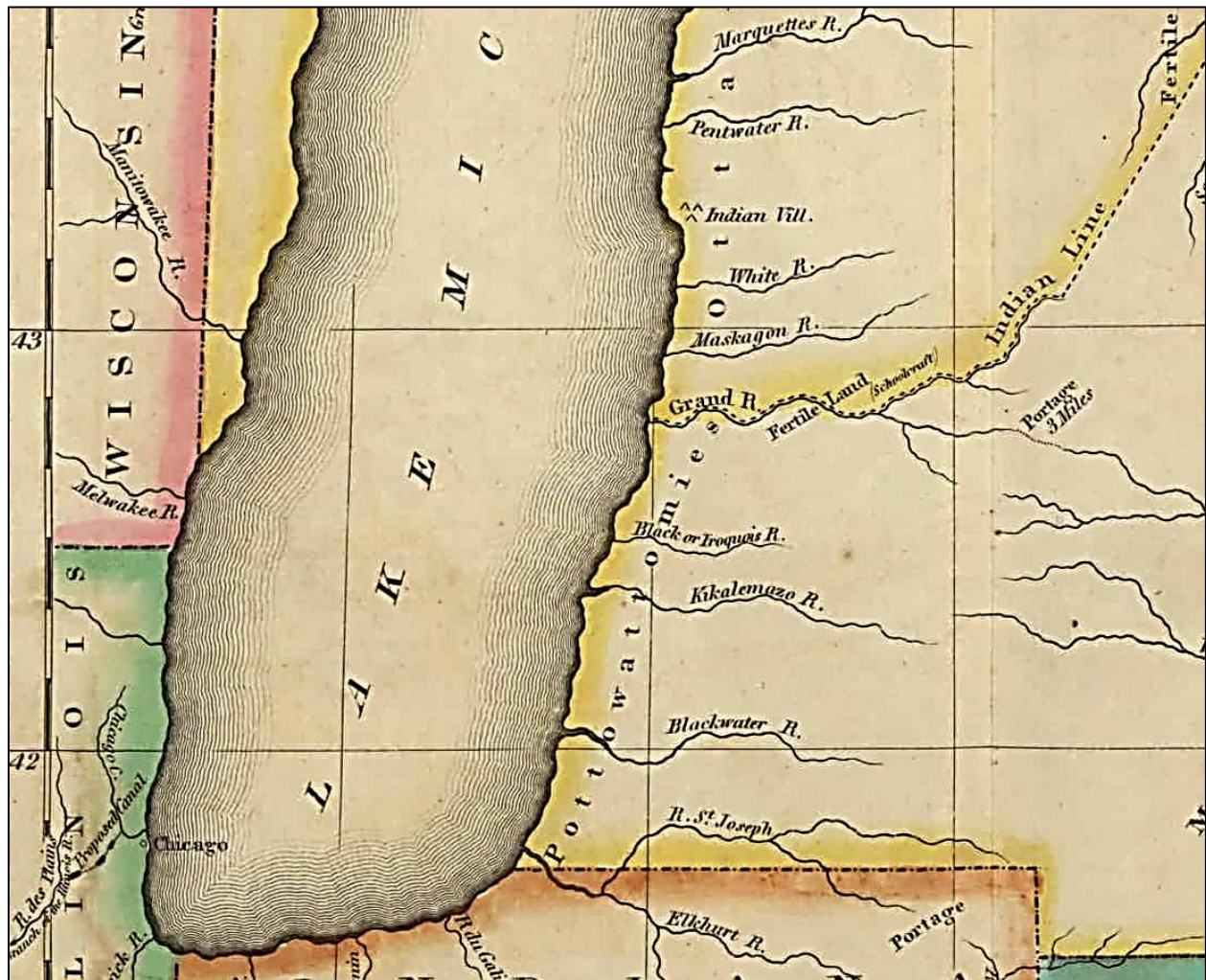


Figure 7: The Kalamazoo River is labeled “Kikalemazo” on this 1822 map from the *Geographical, Historical and Statistical State Map of Michigan Territory*. North is to the top.

KM, another Pokagon Band member, acknowledges this fact and the connection of Chief Leopold to the Saugatuck area:

Saugatuck comes from the word zagitek meaning mouth of the outlet (of the river). Now known as Leopold Pokagon, whose original name was Zakiwnik (man of the outlet), was not Potawatomi, but was born to Odawa & Ojibwe parents. Later called Pegegen (Pokagon – rib or to shield) by Potawatomi chief Topinabee, Zakiwnik was born in an Odawa village. In our ways you can usually tell where someone originates from due to their name, example here in southwest Michigan the Potawatomi villages were mostly along the St. Joseph River & you see that all through history with names. We call the St. Joseph River “senathwen zibe” (rocky flow) because of the rocky rapids

before the dam was put in. This too exists within Odawa & Ojibwe communities, names often tie into locations. Now with Zakiwnik being from an Odawa village he wasn't originally from the St. Joseph river area, so you have to look elsewhere. It is a fact that the Odawas North of here used to camp with the St. Joseph Potawatomi in the winter & also did a lot of trading here. The fact that there is only one place that we call Zagitek that also had an Odawa village, & that Zakiwnik means man of the place of the outlet, then therein states where Zakiwnik / Pegegen / Leopold Pokagon came from.

Leopold Pokagon is a hero of resistance and his story is well-known in Potawatomi history. He quickly rose to become a prominent chief in the southern Michigan area and, through various alliances, stood up to encroaching white settlement into the area. The rapid development of Pokagon's prestige and potency did not come from his numerous alliances alone, however. He also proved to be a savvy player in American politics, standing up to American officials in Chicago, Fort Wayne, and Detroit, while also dispatching memorials to the Governor of Michigan, the Secretary of War, and the President; these maneuvers greatly enhanced both his notoriety and political clout. He used his newfound platform to secure annuity payments at Fort Wayne or St. Joseph. Quickly, however, he began increasingly speaking on more critical issues like the welfare of the Potawatomi, holding on to what lands remained in their possession, and eventually, demanding a treaty to remain in Michigan (Clifton et al. 1986:62).

This staunch refusal to leave the Michigan area is perhaps what Pokagon is best known for. Referencing this, Clifton et al. (1986:62) wrote that "one St. Joseph River Wkama [leader], Leopold Pokagon, refused to yield, and emerged as the most argumentative and effective spokesman for one group of Potawatomi determined to remain in Michigan." His history is enmeshed in legend and tale, viewed as one of the last "Noble Savages" by white America. However, his real biography is more complicated and interesting, as Clifton states, "Leopold Pokagon's very successful career was best understood as a search for the necessary steps that would allow these Potawatomi to stay in the St. Joseph River valley." Efforts to push the Potawatomi out of Michigan in the 1830s-1840s was intensifying:

In 1839, a major effort was underway in southern Michigan to clear this region of Potawatomi, but it failed, not only as regards those exempted by the Chicago treaty from removal because of their religion...[Isaac] Ketchum met with extreme resistance from most Potawatomi, who instead of moving west migrated north, or to Canada, or simply hid out in wooded and swampy areas until the storm had passed [Clifton et al. 1986:71].

And, largely because of this intensifying pressure:

The St. Joseph River bands were determined to resist the threat of removal. Becoming Christians, actively seeking formal education in mission schools, and working to learn American agricultural methods, they prepared themselves well for the 1833 Chicago treaty negotiations. There they demanded and obtained the right to remain in Michigan at the same time that they lost their remaining Michigan reservation lands [Clifton et al. 1986:66].

After more than a decade of negotiations, Pokagon helped to win “their right to remain in Michigan [having] been fully recognized, both by state and federal authorities” (Clifton et al. 1986:67–68). Through these efforts, Leopold Pokagon had established a distinctive identity for his people, and (re)affirmed special treaty rights to stay in southern Michigan (Clifton et al. 1986:69). Notably, several supplementary articles of the 1833 Treaty of Chicago were specifically negotiated by Pokagon, upholding Judge Epaphroditus Ranson’s written opinion that “[the Pokagon Band] had the legal authority to remain in the Michigan should they choose, and no federal authority had the right to force them to do otherwise” (Clifton et al. 1986: 72).

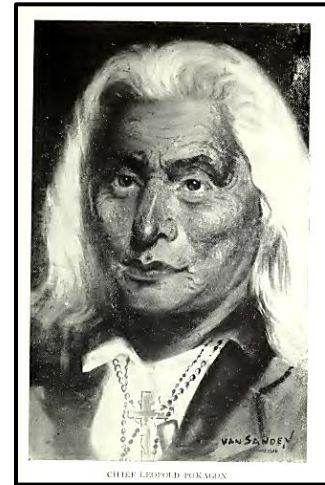


Figure 8: Image of Chief Leopold Pokagon, Pottawatomi historical figure associated with the mouth of the Kalamazoo River (taken from Buechner 1933:295).

3.7.2 Village Sites at the Mouth

The area of southwestern Michigan, particularly areas along waterways and lakes with a consistent and reliable supply of water, have been found to have a higher potential for archaeological sites than areas of higher elevation (Walz 2017:9). The archaeological sites identified and excavated in the region to date are indicative of long-term occupation of the area, extending from early Paleoindian times into the present era. Several archaeological sites, in particular, testify to the long-term use of the mouth of the Kalamazoo River and immediate environs. Site 20AE127, for example, is “reported as the location of a prehistoric Native American village site near the mouth of the Kalamazoo River” (Hinsdale 1931, taken from Walz 2017). Additionally, archaeological site 20AE249 is “reported as the location of numerous Native American graves on the west side of the Kalamazoo River opposite Saugatuck” (Johnson 1880, in Walz 2017). Neither archaeological site has been fully investigated, and therefore, their boundaries and full extents remain largely unknown and undocumented. Likely, they include much, if not all, of the mouth of the Kalamazoo River.

Likely, these archaeological sites are all closely associated with, if not a part of, the documented and culturally known village site or sites located at the mouth of the Kalamazoo River (see Figures 9-11). Important to note, is the fact that these sites are defined and delineated by archaeologists and, therefore, may differ from a tribe’s or descendant community’s definition of its traditional or ancestral site. While archaeological sites may be defined almost exclusively through the presence or absence of archaeological materials, an ancestral site as defined by a community may depend more on landforms, watercourses, soundscapes, viewsheds, and smellscape, plant distributions, animal movements or congregations, and other factors unrelated to how an archaeologist defines a “site.” This can result in a village site, for example, encompassing a much greater area than what the archaeological signatures would suggest the boundary of “a site” to be.

Whether one village site or multiple sites are understood to be there, occupation at the mouth of the Kalamazoo River has been recorded in multiple historical texts and identified in the oral and recorded history of the Match-E-Be-Nash-She-Wish Band. Hinsdale (1931:39) in *Archaeological Atlas of Michigan*

includes a village site and associated burial grounds located at the mouth of the Kalamazoo River near Saugatuck (Figure 9).

According to Fuller (1928), just around the time of non-Indian encroachment into the Kalamazoo Valley (ca. the early decades of the 1800s), several "Indian settlements" were located near the mouth of the Kalamazoo River. He notes that the mouth was a rendezvous point for local tribes and describes, in particular, those gathering to make "the long canoe journey to L'Arbre Croche" (in today's Emmet County, Michigan). He also notes that the beach at the base of the great sand dune at the mouth of the Kalamazoo, known as Mount Baldy or Mount Bald Head, was usually lined with canoes. Fuller describes the conduct of an annual ceremony there at the foot of Mount Baldy, which he refers to as the "Feast of the Dead." He also notes "an Indian village of considerable size" at the "Peach Orchard", a location most likely near the confluence of Peach Creek and the Kalamazoo. In the early 1800s, according to Fuller, every autumn the Ottawa chief Macksaabee and his band would arrive at the mouth of the Kalamazoo, coming there from the area around Mackinaw. Macksaabee's band would spend the winter hunting in the area, and Fuller reports that they regularly held ceremonies on the top of Mount Baldy.

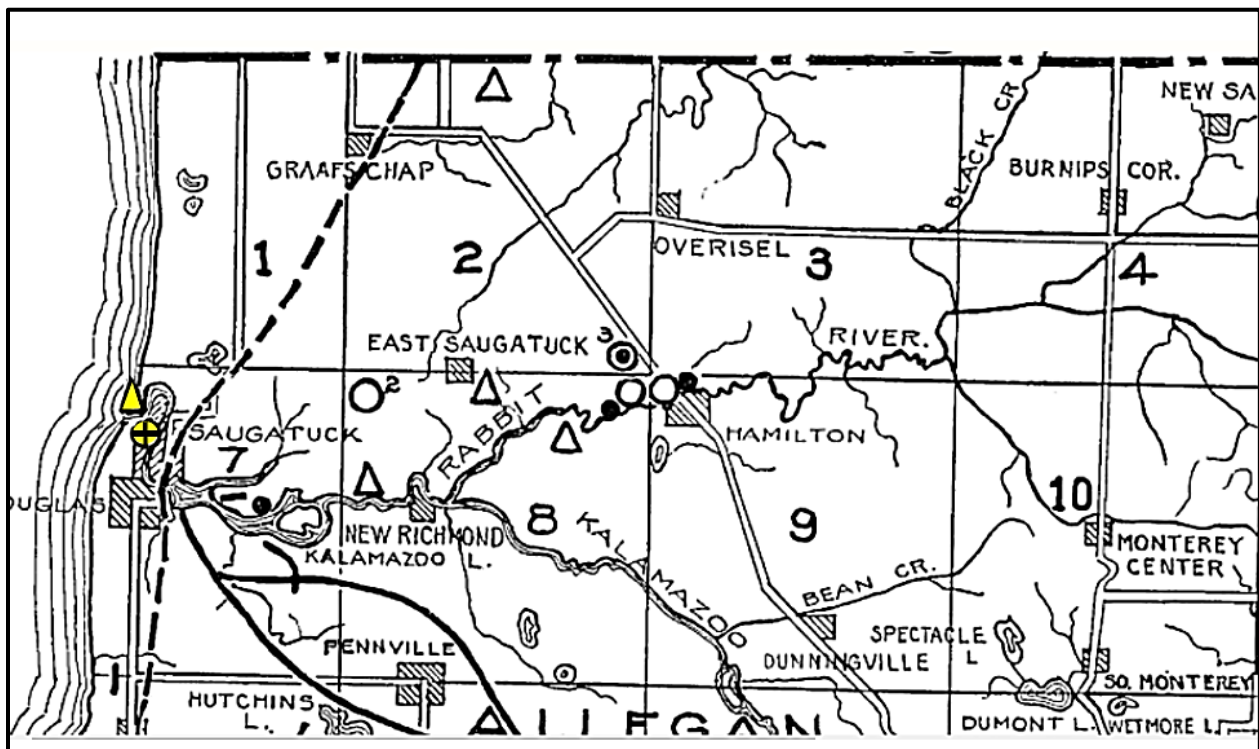


Figure 9: Map of village site (yellow triangle) at the mouth of the Kalamazoo River and burial ground (yellow circle enclosing cross) to the south side, slightly east of the village, taken from Hinsdale (1931:39), yellow highlighting added for the village site and burying ground.

The *Atlas of Great Lakes Indian History* edited by Helen Tanner (1987) also indicates a village site (or several) associated with the mouth of the Kalamazoo River. One map depicting Indian village sites ca. 1810

(Figure 10) shows a village located just south of the mouth, while the other ca. 1830 map indicates a village just north of the mouth of the River (Figure 11). It is not unlikely that the village site spanned both sides of the river, with intensified occupancy switching sides, perhaps as a result of resource availability.

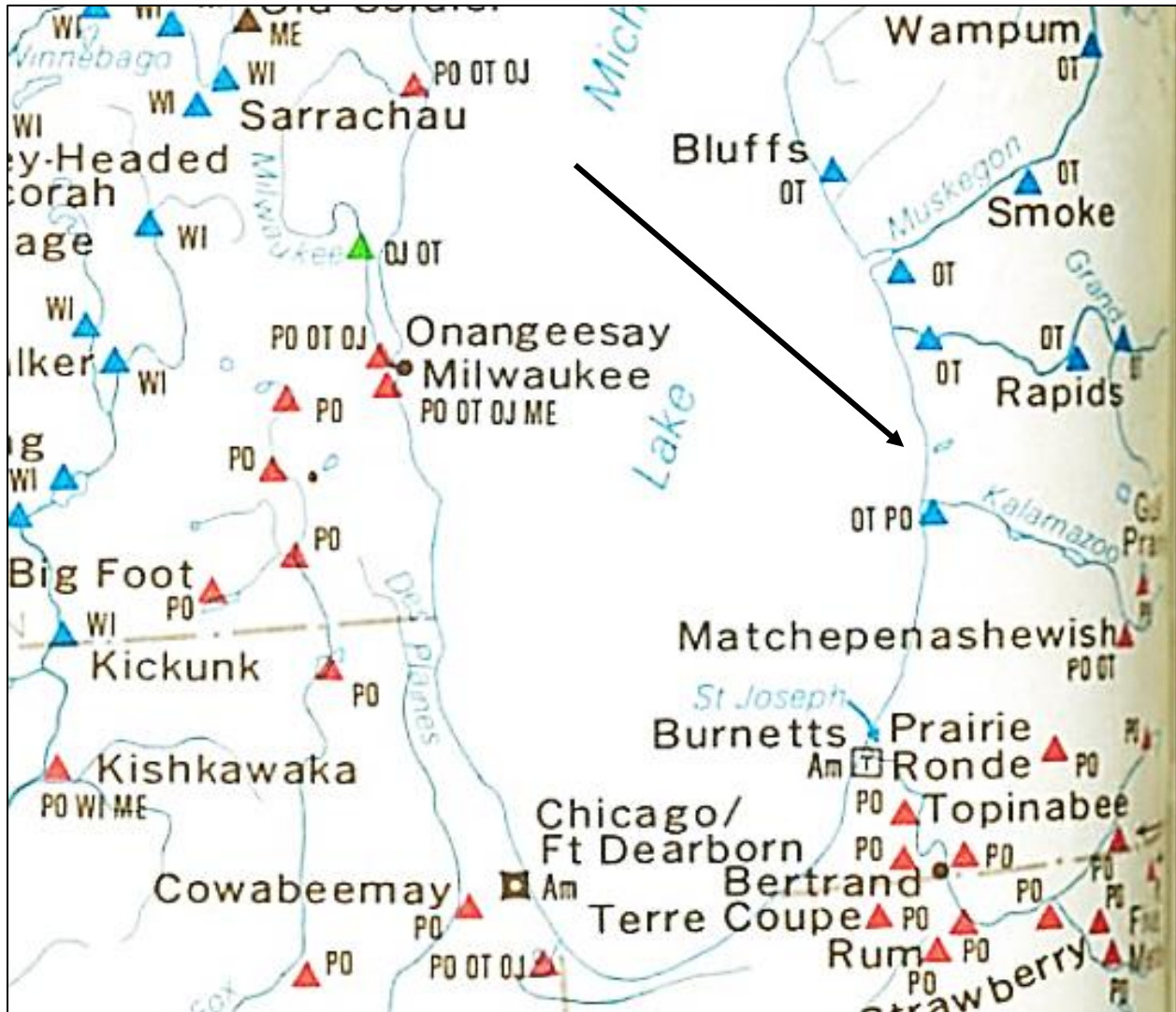


Figure 10: An Ottawa-Pottawatomie village (blue triangle) is shown where the Kalamazoo River joins Lake Michigan. Figure drafted on a portion of Tanner's (1987) map *Indian Villages c. 1810*. Note the overall density of villages. North is to the top.

The Saugatuck Dunes Coastal Alliance and the Saugatuck-Douglas Historical Society attempted to survey and make preliminary assessments of the archaeological and historic resources in and around the coastal dunes to the north and south of the mouth of the Kalamazoo River. The survey identified 17 historic properties that included both standing structures and archaeological sites, of which:

three are listed on the National Register (Felt Estate, Saugatuck Harbor Navigation Structures, Lake Shore Chapel); seven appear to be eligible for listing in the NHRP, and four are considered likely to be eligible for the National Register, but require additional investigation. This latter group includes 20AE619, the Singapore town site. *The study also concludes that the entire study area should be considered to be an important cultural landscape* [Kidorf, Grammer and Busch 2010, emphasis added].

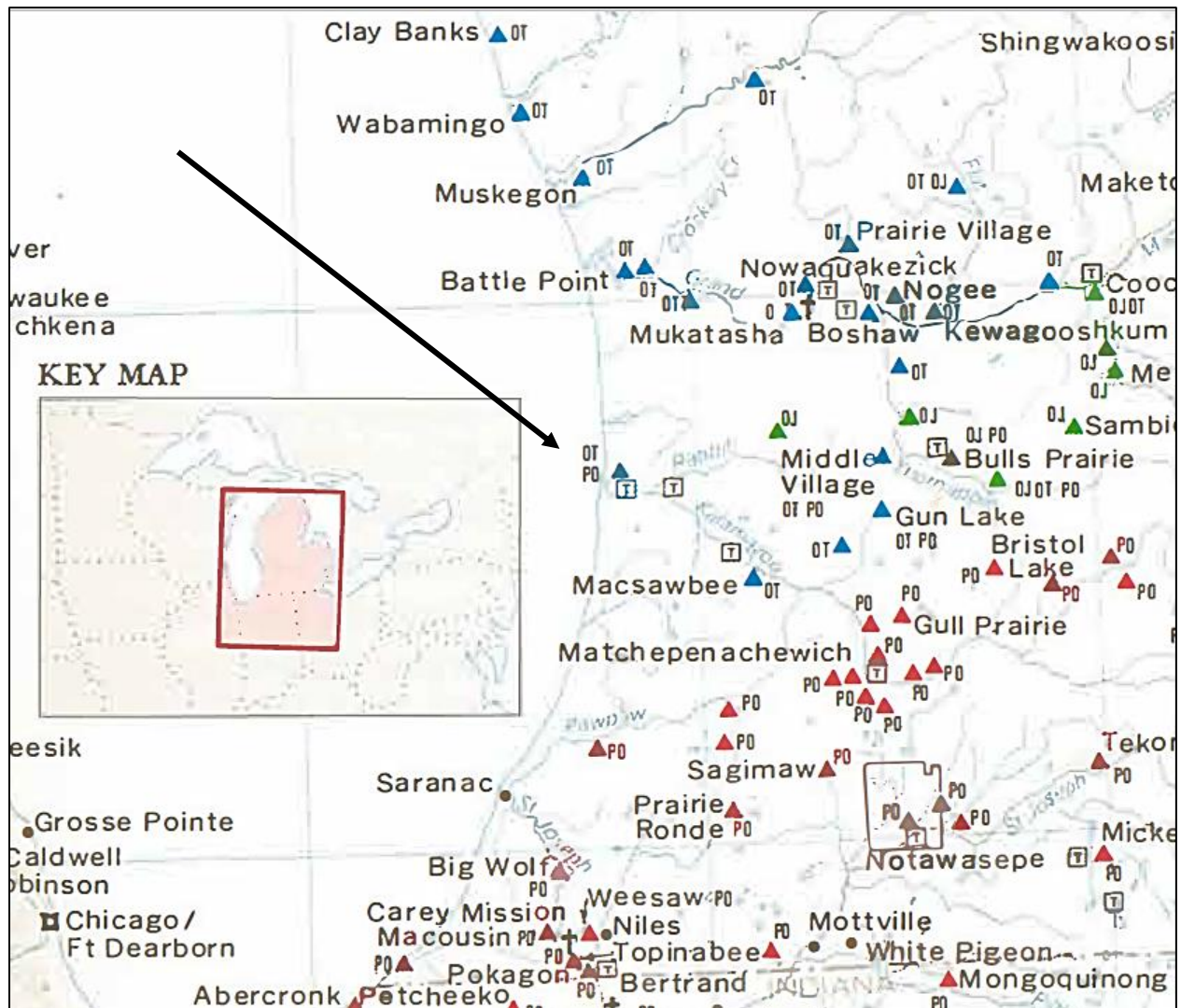


Figure 11: An Ottawa-Pottawatomie village (blue triangle) and a trading post (boxed "T") are shown where the Kalamazoo River joins Lake Michigan. Figure drafted on a portion of Tanner's (1987) map *Indian Villages c. 1830 Michigan Territory, Indiana, Ohio*. Note the overall density of villages. North is to the top, inset map shows area of larger map of which this figure shows a small portion. Black arrow added for reference.

Human burials have been associated with the mouth of the Kalamazoo River. Kidorf, Grammer, and Busch (2010) noted that:

Burials have been reported in both Saugatuck and near the mouth of the Kalamazoo River. Crisfield Johnson recounted that as late as 1842, Indian mounds existed on what is presumably the west side of the Kalamazoo River. Johnson wrote: “[o]n the hills opposite Saugatuck there were visible until recently traces of Indian graves, and among them that of a chief called Wamnus, but there is now no sign to show where they were.” In 1929, an Indian cemetery was reportedly found within Saugatuck: archaeologist George Quimby recounted that between thirty and fifty burials were found during construction of a community hall. The grave goods included birch bark, bundles of feathers, brass kettles, pewter porringers, an iron knife, iron axes, brass-rimmed spectacles, china, a mirror, silver spoons, silk, cotton prints, blankets, and wooden pipes. Perhaps most intriguing are three marked silver brooches that were recovered. One was marked with the initials “JK,” most likely for silversmith John Kinzie and dating between 1780 and 1812, making it an excellent horizon marker.

Other references to mounds near Saugatuck also can be found. Volume 1 of the *Michigan History Magazine* notes a donation to the State Museum in East Lansing from W.W. Moulton of Saugatuck of “Seven Indian beads dug up at Saugatuck, from an old Indian mound where thirteen Indians were buried in a sitting position” (1917:159).

3.7.3 Trails Leading to the Mouth

The mouth of the Kalamazoo River, as well as the Kalamazoo Riverscape in its entirety, is associated with a trail network indicative of long-term occupation and traditional cultural activity. Frequently, trail density, especially close to a river, indicates a meeting place, a living space, or a good fording place. In his seminal text entitled *Economic and Social Beginnings of Michigan*, Fuller (1916:325-326) describes this situation along the Kalamazoo River:

the concentration of trails at a river indicated usually a good fording place, sometimes caused by shallows, often by rapids, the latter affording stepping stones for crossing. At the rapids fish were likely to accumulate in passing up-stream. The soil in the vicinity being usually a fertile alluvium and easy to cultivate, and Indian village was likely to grow up there and with the interest of the Indian coincided those of the fur trader in making this the chief point of their trade.

The 1931 *Archaeological Atlas of Michigan*, which indicated that the mouth of the Kalamazoo River was, in fact, the destination of a major branch of the Pottawatomi “Territorial Trail,” noted:

Two paths crossed the Chicago or Sauk Trail at Ypsilante and passed through Ann Arbor. One followed the Huron River from its mouth; the other came in over the higher land from the south. Beyond Ann Arbor the so-called Territorial Trail went through the centers of Jackson and Calhoun counties and branched. A branch went to Kalamazoo and finally united with the Chicago trail in southeastern Berrien county. The northern branch of the Territorial Trail again bifurcated for the mouth of the St. Joseph River at St. Joseph and for the mouth of the Kalamazoo at Saugatuck [Hinsdale 1931:5, emphasis added].

The passage above, particularly the italicized section, explains that the mouth of the Kalamazoo River is directly connected to a vast trail network that spanned much of the region. The passage indicates that the mouth of the Kalamazoo River, in particular, was a specific destination point. Hinsdale (1931), referencing Fuller's (1916) text, also highlighted the density of the trail network in Allegan County and along the Kalamazoo River, noting that Hinsdale (1931) had referred to the Kalamazoo as an important avenue for travel for Indian people moving through the area.

Fuller (1916:324–325) adds:

Closely associated with the waterways as agents in determining the location of the first [white] settlements were the Indian trails. The principal trail of the section was the Washtenaw Trail, which lay westward from Ann Arbor along the banks of the Kalamazoo, and from which at various points local trails branched off to the neighboring country. In the western part of the section the site of Kalamazoo was a point upon which local trails converged from various directions, chiefly from the neighboring prairies, and became the lines of the first recorded roads in the county. In the eastern part of the section a similar point was the site of Jackson, a favorite Indian camping ground; its first white settler is said to have reached that point by the aid of the Potawatomi Indian guide. These two places, *together with Saugatuck at the mouth of the Kalamazoo, an Indian haunt* commemorated by Cooper, were the first river sites in the section to be chosen for white settlement [emphasis added].

That one branch of the Territorial Trail led to the mouth of the Kalamazoo River suggests the importance of this section of the river (i.e., its mouth). The cultural distinctiveness or elevated significance of the mouth of the Kalamazoo River, particularly as a destination or “gathering place,” is demonstrated further in Johnson and Ensign (1880):

The vicinity of the mouth of the Kalamazoo was, from a period long anterior to the first settlement of the whites down to 1840 or later, a great gathering-place for the Ottawa and some Pottawattamie Indians, who came thither from Mackinaw every autumn, scattered through the country to the eastward to hunt during the winter, and returned to the mouth of the river in the spring ... As late as 1842 there existed near Saugatuck several Indian mounds, but the plowshares of the settlers soon obliterated these relics of primeval days. On the hills opposite Saugatuck there were visible until recently traces of Indian graves, and among them that of chief called Wamnus, but there is now no sign to show where they were.

3.7.4 Continuing Traditional Cultural Significance

In more recent years, the Match-E-Be-Nash-She-Wish Band continues to use the mouth of the Kalamazoo River for a variety of cultural activities, honoring the long tradition connected to this place. One interviewee of the Match-E-Be-Nash-She-Wish Band, SM, spoke of her relative buried along the River, as well as her daughter fasting near the mouth, an important traditional activity. The story, recalled in vivid detail, helped to underscore her point of the area's unique significance:

Anyway, he got sick there, he got pneumonia or something, and he passed away, so his people buried him [at an undisclosed location along the Kalamazoo downriver from Ottawa Marsh]. In order to hide it [his grave] in case white people did come and discover where they were hiding, they built a big fire over it...to them a sacred fire. [5:00] And that was to hide his grave from anybody that might come along and see it. And afterwards...they planted a tree there, and that's another thing that our people did to hide our graves, was to plant trees over our graves so that, that would keep people from...finding it. So that...my great aunt Helen, my grandpa's sister, took us out there, and told us all of this, and showed us that place, and so we were using that [place], and to this day we use it. My [older] daughter ... went out there for her first fast when she had her first period. Medicine people [Moose Pamp and Jim Shaver] took her out and put her out there. And they left her there for her fast to last long enough till her first period was finished. This was on January 9 and it was the middle of winter and I was very fearful about it.

But she wanted to do this and she knew she just had to do it, and the medicine people had planned for this because they knew it was her time. And they took her there, and [my husband], of course, went along, I didn't. And our [younger] daughter ... went along, and she was just a little girl then and probably two or three years old...so she [went] along with them because she was the kind of little girl that had to be in on everything and she loved her dad and she went everywhere he went. She stuck to him like glue. Any way they went out there and took some firewood with them, enough to give her [older daughter] some...[warmth] enough for the night after they helped her build her lodge and she built it in a place where she could use the young trees around there, it was about halfway down from the bluff to the creek where she found a nice, flat, level spot. She took those twig trees that were around her there and built it there. She had a tarp and she made kind of like a lean-to because she wanted her fire to be able to get into her lean-to to keep her warm. So they left her there with water and that was that, no food, and [younger daughter] was watching all of that and she was amazed. She came home wanting to know why [older daughter] wanted to do that, and I told her, so we had to go through all of that women's biological functions and she just listened. So every day her dad would go back out there with either Moose or Jim to go check on her, but they wouldn't go down and talk to her. They would just stand up there and see she was alive and well. She would see them and wave, and they would wave, and they would take some more firewood for her at that point and they would just leave it right at the top of the hill and she could come up and get it. So she did that and this went on for five days until she came and met them and said she thought she was finished with her first period, but during this time she knew that was where her ancestor was buried, right on top of the hill, where they went to drop off the firewood, so she felt safe knowing that her ancestor was there, and sure enough it turned out she was.

One evening, when [younger daughter] went out there with her dad, she saw [older daughter], she never went down there, but she saw [older daughter's] fire and everything. You know how those embers go up in the air sometimes? She saw those, and she says to her dad and Moose on the way back, she said when do fireflies come

out? And they said well that's usually in August, in the late summer. And she said well I saw some around [older daughter's] house. So she was seeing not embers, but fireflies going around and around [older daughter's] house [lean to]. So they knew what that meant, and they didn't say anything, and we told her later when she grew up that those were spirits. So I believe that because I see fireflies in January sometimes myself...

So that place where my great-great-great grandfather was buried was significant because that was shown to us by Aunt Helen who was Sam Pigeon's sister, my grandpa's sister.

The River, including the mouth from Lake Michigan inland to Ottawa Marsh, plays a central and ongoing role in community language, environmental, and cultural preservation/education activities. A few recent examples include an event in 2019, where Match-E-Be-Nash-She-Wish Band member CB taught language and traditional food lessons about the plants and animals along the River, about traditional canoes, and about the River itself. In immediately preceding years, other language and culture teaching events included presentations about the River's healing power and the community's responsibility to protect its waters, ceremonies related to the River, plants and animals important to the community that live near the River, and the River's traditional role as a "highway" that facilitated trade. Additional events during this time included canoeing on the River in birch and elm bark canoes while learning language related to watercraft and traveling on the River. The Match-E-Be-Nash-She-Wish Band's lake sturgeon program also releases fish every year at the Ottawa Marsh/Rabbit River confluence as part of its lake sturgeon recovery efforts.

3.7.5 Summary of Traditional Cultural Significance

The Match-E-Be-Nash-She-Wish Band asserts that many of the cultural resources connected to the TCP, although in some cases dynamic or migratory, are still inseparably tied to the River's mouth. Within the Pottawatomi worldview, one cannot divorce the resources from a particular area, especially in the context of a flowing river. Lake sturgeon, for example, use the mouth of the Kalamazoo River as they do the rest of the waterway, and therefore, any impacts to one area can have far reaching consequences beyond a project's often more narrowly defined "footprint."

The mouth of the Kalamazoo River and its immediate vicinity upriver is the site of traditional sturgeon fishing, as noted above. This practice so important to the Band that efforts to rehabilitate the sturgeon population are ongoing. Sturgeon fishing and the tribe's relationship with sturgeon have been important components of the Match-E-Be-Nash-She-Wish Band for centuries, evidenced archaeologically through material remains and ethnographically through sturgeon's elevated importance within tribal beliefs, as discussed above in subsection 3.4.1 (e.g., the sturgeon clan and viewing sturgeon as relatives and ancestors). The mouth is also connected to ceremonial practices such as fasting, and a great many other traditional activities like wild rice gathering, birch bark collection, and cattail gathering. These activities are all deeply rooted in the community's history and worldview. The historically documented village sites at the mouth underscore long-term traditional connections to the mouth of the river specifically.

The Match-E-Be-Nash-She-Wish Band's identity is closely linked to sturgeon and wild rice harvesting. Maintaining sturgeon populations and reseeded the Kalamazoo watershed with wild rice to harvest are

important activities today that maintain a relationship with the land; as one Band member, LS, noted during an interview, these current practices rooted in historical lifeways and tradition are intimately linked to what it means to be Pottawatomi today:

So for the last 6 years, my family and I have been working with several tribes to help restore wild rice in the area. My sons ... and my daughter ... have been helping me to locate and harvest wild rice for reseeding into the Kalamazoo and St. Joseph watersheds. We have been cooperating with NHBP [Nottawaseppi Huron Band of the Potawatomi] and Gun Lake environmental departments in this effort, working upriver from the Kalamazoo Oil Spill area, in the tributaries, and downriver of the Oilspill to Lake Michigan. Also, [Match-E-Be-Nash-She-Wish Band member], her daughter, and [member of Citizen Band Potawatomi] assisted in seeding the upper sections of the Kalamazoo River this year. We also gathered seeds along our Potawatomie historical locations, on the Illinois River and the Fox River Watershed, Grass Lake and the Mukwonago River watersheds.

Gun Lake Environmental has been working in the downriver portion of the Kalamazoo River. Together, we have transplanted wild rice plants from upriver in the Kalamazoo by Albion, back into the lower Kalamazoo watersheds as part of the Natural Resource Damage Assessment and Restoration (NRDAR) efforts on the Enbridge Oil Spill.

Wild Rice Restoration Efforts in the Kalamazoo are a system wide effort. There is ample historical evidence of wild rice growing throughout the entire Kalamazoo Watershed from our ways of understanding. Our prophecies, our stories, have us living where the food grows on the water. So our relatives chose to live here in this part of the Great Lakes. I believe that it is part of our history, restoring the damage, bringing back wild rice, and clan fish, the sturgeon whose clan has responsibilities to guard the waters for our wild rice. We talk of wild rice and sturgeon restoration in the Kalamazoo Rivers. These are two of the indicator species, that thrive in healthy river systems, where dams are removed, and wild rice seeds flow down the river, and sturgeon and lake trout come up the Kalamazoo River above the Dams.

Further, as noted earlier, wild rice is featured in the ethnogenesis of the Pottawatomi. According to their oral history, wild rice is literally the driving resource in their movements and origin stories. Therefore, the continuing relationship to gathering areas, such as the one located at the River's mouth, is of utmost importance to maintaining tribal identity. It should be noted that development in the area is impinging and negatively impacting that ongoing maintenance of the Band's cultural identity. The mouth, which remains largely undeveloped, is one of the last bastions in which the Band can actively practice and maintain these cultural beliefs and practices that inform their unique identity.

The information discussed above and elsewhere in this report make it clear that the Band's very identity is influenced and partly defined through their ancestral ties to the River's mouth. That connection to one of the last remaining undeveloped pieces of land in the area increases the significance of this place simply because other nearby cultural places have been damaged or destroyed by development. Indeed, Band members' "sense of self" is actively maintained through their "sense of place". Indeed, "what matters

most is where events occurred, not when ... [therefore] temporal considerations, though certainly not irrelevant, are accorded secondary importance" (Basso 1996:31).

Our research supports the contention of the Match-E-Be-Nash-She-Wish Band that the mouth of the Kalamazoo River is a TCP, one probably best viewed as a cultural landscape and part of a larger Kalamazoo Riverscape. The significance of this landscape and its contributing elements is deeply rooted within Pottawatomie culture, tradition, beliefs, and practices, and remains important in maintaining and expressing what it means to be Pottawatomie today.

4.0 Establishing Eligibility for Listing in the National Register of Historic Places

National Register Bulletin 38 outlines four steps to establish whether a TCP is eligible for listing in the National Register. These steps are listed and discussed below:

STEP 1: Ensure that the Entity Under Consideration is a Property

National Register Bulletin 38 specifies that "the entity evaluated must be a tangible property—that is, a, a district, site, building, structure, or object" (Parker and King 1998:11). As we established in the preceding section, the mouth of the Kalamazoo River is easily regarded as a traditional cultural landscape, and as such, is a distinctive physical, tangible *property*. It is a place with contributing physical and non-physical elements that, altogether, comprise the TCP. This property called the mouth of the Kalamazoo extends upriver to at least the first rapids, as well as north and south of the mouth to incorporate a variety of interconnected cultural resources. Among the site types listed in the National Historic Preservation Act, the mouth of the Kalamazoo River TCP would be best characterized as a *site* or cultural *district*.

STEP 2: Consider the Property's Integrity

National Register Bulletin 38 notes that "in order to be eligible for inclusion in the Register, a property must have 'integrity of location, design, setting, materials, workmanship, feeling, and association'" (36 CFR 60), but in the case of TCPs specifically, the two main things to ask are "first, does the property have an integral relationship to traditional cultural practices or beliefs; and second, is the condition of the property such that the relevant relationships survived?" (Parker and King 1998:11). These two issues of integrity are discussed below.

As far as an *Integrity of Relationship*, National Register Bulletin 38 clarifies that if a "property is known or likely to be regarded by a traditional cultural group as important in the retention or transmittal of a belief, or to the performance of a practice, the property can be taken to have an integral relationship with the belief of practice, or vice-versa" (Parker and King 1998:11). On this point, the Match-E-Be-Nash-She-Wish Band has continually asserted its connection to the Mouth of the Kalamazoo River as a place important for traditional cultural practices including fasting, fishing and fish management, and resource collection. Multiple tribal consultants underscored this strong connection. These accounts, presented in full above, include statements such as:

the Kalamazoo River has always been and remains today a source of spiritual power for the Potawatomi of Southwest Michigan. The water is one of four main spirits that we acknowledge when offering prayers and medicine bundles for healing [Match-E-Be-Nash-She-Wish Band member Punkin Shananaquet]

And Punkin Shananaquet's other statement:

Sturgeon were another source of subsistence for native people in the watershed as they moved from the big lake up the river. It was at one of these camps that my great-great grandfather became ill and died while spearing sturgeon. The people wrapped him in birch bark and placed him in a cliff along the Kalamazoo River so that his final resting place would not be disturbed by the Whiteman. This story has been handed down in oral tradition from one generation to another. My mother told it to me as part of the reason why I would be fasting at this particular place along the Kalamazoo River. My four-day 'berry fast' occurred when I was fourteen years of age in 1975. I offer this story as but one example among many within the history of my people an example of the spiritual significance along with oral traditions that ties me and my people to the land and Kalamazoo River forever.

As well as this from SM, another Match-E-Be-Nash-She-Wish Band member:

All of that sacred river that nourished us and fed us and provided food, not only fish, but other sources of food that we knew grew along the river. They knew where the wild rice and everything was. They used a lot of the seaweed and the plants that grow in the river to eat, so it was more than fish and muskrats and beaver, it was a lifeline because in the summer, spring, and fall, they would also use the river to gather black ash to make their tools with, their baskets with, what they needed.

SM also added:

It would be the place [the confluence of the Kalamazoo River and Lake Michigan] our ancestors gathered for centuries and centuries and centuries, it would be the place we can feel at home and feel but we're home. We know this is the place our ancestors were, we know that. And it's important for us to have access to it.

Based on the ethnographic source material presented in this report, and the selected excerpts above from tribal members' statements, it appears that there remains a strong relationship between the Match-E-Be-Nash-She-Wish Band's core values and belief systems and the mouth of the Kalamazoo River. Although development has occurred in the area, and some of the property within the TCP is now privatized, the Match-E-Be-Nash-She-Wish Band's beliefs and values connected to the mouth remain strong; the property continues to be used for traditional practices that inform Tribal members what it means to be Pottawatomi. And, the property contributes to the transference of those beliefs and practices from generation to generation today. Because of this, integrity of relationship appears to exist.

In terms of *Integrity of Condition*, Bulletin 38 warns that "a property that once had traditional cultural significance can lose such significance through physical alteration of its location, setting, design, or materials," adding that "in some cases, a traditional cultural property can also lose significance through alteration of its setting or environment" but a property may still "retain its traditional cultural significance even though it has been substantially modified, however (Parker and King 1998:12). This is because cultural values, belief systems, and other traditional practices are dynamic, and can adapt to change. Critically, it should be underscored, just because beliefs and practices may accommodate change doesn't necessarily mean they are any less integral to a group's ongoing relationship to a place. Addressing this,

National Register Bulletin 38 specifies that “the integrity of a possible traditional cultural property must be considered with reference to the views of traditional practitioners; if its integrity has not been lost in their eyes, it probably has sufficient integrity to justify further evaluation.” And, even more critically, “some kinds of traditional cultural significance also may be retained regardless of how the surroundings of a property may be changed” (Parker and King 1998:12).

As noted above, the landscape as shown in Figure 1 (Section 1.0) includes both the location of the old mouth and the location of the new mouth, as well as related contributing elements associated with the river’s mouth. For Match-E-Be-Nash-She-Wish Band members, the mouth is considered a larger area that encompasses the area where the forests, river, and lake meet. As was noted previously in the statement by JS, a tribal member interviewee: *Everything occurred there [the places where rivers, lakes, and forest would meet], our people from around Anishinaabe country all knew where these places were. We didn’t have a road map to know, we knew, our people knew this.* Therefore, although the mouth has been relocated, it still lies within the “coming together of the river, the lake, and forest” which is an important component of what makes the area significant. Further, although the mouth has been moved, a major component of why the actual mouth is important is the migration of sturgeon and other fish up into the Kalamazoo to spawn, and back through the mouth into Lake Michigan, which has continued to occur as the mouth has moved.

Other surrounding developments have undoubtedly impacted the once much more pristine and undeveloped setting of the landscape. Particular to fishing, several Match-E-Be-Nash-She-Wish Band members, including LS, expressed concerns over the quality of the water and fish:

On the Kalamazoo and Grand River as a kid, probably 12-15, we did fish a few times in the big rivers, but we gave any fish we caught away to people who would eat them. Even then we knew the rivers were polluted from industry, agricultural runoff and sewage. So we stayed away from the Grand River and Kalamazoo River for the most part, just for fun, even though we knew better. My dad didn’t like us to fish unless we planned on eating the fish. I don’t ever remember eating a fish my brothers and I caught from the Grand River or the Kalamazoo river.

However, the mouth of the Kalamazoo River retains an unusually high degree of undeveloped area. The Lower Kalamazoo River, in fact, was designated by the Michigan Department of Natural Resources in 1981 as a “wild and scenic” river under the Natural Rivers Act. Further, the Kalamazoo River Watershed, specifically the mouth of the river on the Lake Michigan shoreline, remains one of the very few undeveloped river outlets on the Lake Michigan shoreline and one of the only undeveloped river outlets on Lake Michigan within the ancestral territory of the Pottawatomi.

Thus, even in the face of negative impacts due to development, poor water quality, and other changes to the original condition of the area, it is understandable that the Match-E-Be-Nash-She-Wish Band still feels that the significance of the landscape remains; the mouth of the Kalamazoo River continues to be a place of religious and cultural significance to Pottawatomi people where they are able to continue cultural practices and restore cultural resources. It seems, in the eyes of the Match-E-Be-Nash-She-Wish Band members, there is a clear integrity of condition.

Notably, attempts to maintain this integrity of condition are ongoing through surgeon rehabilitation programs and regular wild rice reseeding efforts within the Kalamazoo River watershed:

For me, this is important [wild rice reseeding]. The Rivers we live on and near, are becoming viable as a food source, transportation, medicines, and connects the land to the water's edge, and the air. As a crane clan member, this is where I spend my time. This is where I bring my children to understand the Kalamazoo River. I live in the Kalamazoo River Watershed, and have spent considerable time here in many of the Tributaries and source lakes to the Kalamazoo. The Gun Lake Tribe takes our youth to the Kalamazoo River, and I know that Tribal Members also traverse the Kalamazoo River in certain areas.

Restoring the Kalamazoo River from headwaters to its Delta at Lake Michigan is important to our Peoples. Overcoming and mitigating the legacy of Industrial, Agricultural and Urban pollutions, and repurposing of wetlands, and the sand dunes that accompany our rivers journey to the shores of Lake Michigan is essential to our peoples' wellbeing and history. A healthy river system is also important to all the clan relations in the water air and land. It is also important to the new peoples who live in our Potawatomi territories. It is my belief that as we continue to live in this part of the world, as a riverine people, all these waters are important. As long as our stories continue, our Migration Story, to live with the food that grows on the water, and our creations story of the Turtle and Muskrat, and other clan relations continue, we the Anishinabek, Potawatomi will continue, in a good way [LS, Match-E-Be-Nash-She-Wish Band member].

However, there is still a concern by the Match-E-Be-Nash-She-Wish Band and its members that continued developmental projects, such as the proposed marina, might severely and irreversibly damage this remaining integrity of condition:

Well it [the Kalamazoo River Mouth] is important to us, and it should be important to everybody, not only me and you and the Indians, it should be important to white people, to other Michiganders why it's important. It isn't just a resource for them to have their summer cottages there because it's a beautiful place. But I always think back to before everybody was there, it must have really been beautiful then in the old ways.

I wish they could respect that water because the more people that come and dump their sewage, garbage, oil on our water—you know this from the all water awareness from the [protests] out in the Dakotas a couple of years ago, everybody knows about it now, but we have to make our own area here and be aware of the history of this place, not just what they can build or improve or change. Or they think enhance, or by enhancing that area...[to build the marina]...is not for the benefit of anybody except themselves...that area, they took it from us already, they don't need to take it again and again and again, and do with it what they want. They have some obligation to keep it natural, it's too beautiful, it's too precious to confiscate for their own ends... [SM].

STEP 3: Evaluate the Property with Reference to the National Register Criteria

Having established that the mouth of the Kalamazoo is a TCP and that it retains both integrity of relationship and integrity of condition, it is our opinion that the mouth of the Kalamazoo River TCP is eligible for the National Register under 36 CFR 60.4. There are four criteria of eligibility to the National Register of Historic Places. A property needs to meet only one of the four criteria to be eligible for listing. This study recommends that the mouth of the Kalamazoo River is likely eligible under the following criteria:

Criterion (a): Association with events that have made a significant contribution to the broad patterns of our history.

- The mouth of the Kalamazoo River is emblematic of Pottawatomi subsistence and settlement patterning that have informed tribal activity and history for millennia. Most distinctively, the long history of sturgeon fishing and management at the mouth of the Kalamazoo River are practices that have greatly contributed to Pottawatomi history and cultural practices.
- Additionally, gathering wild rice, a resource that is featured in their oral histories and ethnogenesis in the area, was historically collected at the river's mouth, and continues to be a resource important to the tribe today. The management and gathering of this resource, traditionally practiced over the centuries, greatly impacted Pottawatomi belief systems as well as seasonal movements across their traditional lands. As such, the ongoing practice of wild rice gathering has significantly contributed to the broad patterns of Pottawatomi history, both in the distant past as well as in the more recent post-EuroAmerican contact period.
- Further, the collection of other important traditional resources such as birch bark, cattails, reeds, and other resources present at the mouth of the river are traditional practices that have been done for centuries, if not millennia. These activities greatly impact seasonal movements, land use, and traditional belief systems. Because of this, these activities have also significantly contributed to the broad patterns of Pottawatomi history. These many activities continue to inform and contribute to what it means to be Pottawatomi today, contributing not just to their identity but the cultural vitality of the tribe as well.

Criterion (b): Association with the lives of persons significant in our past.

- The mouth of the Kalamazoo River, and village site located at the mouth, is associated with Chief Leopold Pokagon, a prominent and historically significant Pottawatomi figurehead who vigorously fought to retain Pottawatomi connections to the lands and waterways in southwestern Michigan, including the Kalamazoo River watershed. His efforts allowed Pottawatomi people to continue traditional practices at the mouth of the River.
- Additionally, the mouth of the Kalamazoo River is connected to Sturgeon, viewed by the Match-E-Be-Nash-She-Wish Band as ancestral grandparents, and serve as animal kin significant in their past and current traditional lifeways.

Criterion (d): History of yielding, or may be likely to yield, information important in prehistory or history.

- Ethnographic and archaeological studies have yielded information important to the prehistory and history of the area. Future studies of the area will likely yield more information about the significance of both the mouth of the Kalamazoo River specifically, and the surrounding area generally. Some of the archaeological and historical material culture already uncovered include:
 - Several prehistoric villages sites and archaeological material are associated with the mouth of the river, including mounds, that may have the potential to yield more information.
 - Because this is the first ethnographic study done of the mouth of the Kalamazoo River, and ethnographic information can often be esoteric in nature because it is scattered in various archives and/or sometimes only known by a few individuals within the community, there is a strong likelihood that continued ethnographic study of the mouth of the Kalamazoo River would yield more information about the cultural significance of the area.

STEP 4: Determine Whether any of the National Register Criteria Considerations Make the Property Ineligible

After listing the eligibility criteria, National Historic Preservation Act federal regulation 36 CFR 60.4 “Criteria for Evaluation” further stipulates that:

Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible for the National Register.

The mouth of the Kalamazoo River cultural site and traditional cultural property does not fall under any of these criteria of ineligibility, and is therefore eligible under the criteria a, b, and d as listed above. However, these criteria considerations are still discussed further below, demonstrating they do not meet any of the ineligibility considerations:

Consideration A: a religious property deriving primary significance from architectural or artistic distinction or historical importance.

- The property is used for religious purposes, however, since these activities are done by a Native American Tribe—and therefore a ward of the state—it is subject to Permissible Accommodation (Exec. Order No. 13007, 61 Fed. Reg. 26,771 [1996]).

Consideration B: a building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event.

- There are no contributing properties that have been relocated to be within the TCP.

Consideration C: a birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his productive life.

- With prehistoric villages and seasonal camps located within and near the mouth of the Kalamazoo River, it has been a birthplace for tribal members as well as a property likely containing numerous undisclosed prehistoric and historic burials and gravesites. Although these disclosed and undisclosed places hold an ancestral significance and pay testament to the Pottawatomi's deep-time connection to place, they are, however, only a small part of the overall traditional cultural significance of the property.

Consideration D: a cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events.

- As a property associated with the Match-E-Be-Nash-She-Wish Band for generations and as a property that contains archaeological deposits, and a known village and surrounding campsites, undisclosed cemeteries and other grave sites are undoubtedly located within the property. These undisclosed cemeteries and grave sites are undoubtedly important to the Match-E-Be-Nash-She-Wish Band, and contribute to the need to preserve and protect the area. However, the property does not derive its primary significance from these undisclosed graves.

Consideration E: a reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived.

- Not Applicable.

Consideration F: A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance.

- Not Applicable.

Consideration G: A property achieving significance within the past 50 years if it is of exceptional importance.

- The mouth of the Kalamazoo River is a property that has been significant to the Pottawatomi for centuries, and thus, possesses strong significance to the tribe for much longer than 50 years.

5.0 Connections to the National Environmental Policy Act

Although the discussion has focused predominately on the National Historic Preservation Act and the framework established by its Section 106, the National Environmental Policy Act (NEPA) has obvious connections to the marina project. The discussion of "cultural resources" above is found within the NEPA regulations at 40 CFR 1508.27(b)(3) and (b)(8). Cultural resources include the mouth of the Kalamazoo River along with the many identified plants, animals, and other contributing elements detailed earlier in

the report (i.e., sturgeon, suckers, wild rice, birch and ash trees, cattails, reeds, water, etc.). These many important cultural resources connected to the mouth of the Kalamazoo River TCP remain important to the health as well as the physical, spiritual, and cultural wellbeing of the tribe regardless of their significance and eligibility to the National Register. These many cultural resources identified and discussed previously are among the factors that should be evaluated when assessing whether an environmental impact (EIS) is necessary under NEPA.

6.0 Discussion of Adverse Effects

Below is a brief discussion of potential adverse effects that have been identified by tribal members during the course of the ethnographic study. Match-E-Be-Nash-She-Wish Band members expressed concerns about multiple current and potential adverse effects related to the marina's construction. It should be noted that identifying all the adverse effects the undertaking may have is beyond the current scope of Algonquin's contract. However, likely adverse impacts expressed by tribal members during the interviews include concerns over the effects the undertaking may have upon sturgeon rehabilitation efforts, the cultural integrity of the landscape, and issues of the cumulative development effect.

6.1 The Area of Potential Effects

It is not clear, at this time, what the full extent of the Area of Potential Effects (APE) will be when formally designated by USACE-Detroit. Multiple consulting parties, including the Match-E-Be-Nash-She-Wish Band, have expressed that the North Shores permit area as defined by the Army Corps per their Appendix does not encompass the Area of Potential Effects as defined by the Section 106 regulations. Per the Advisory Council on Historic Preservation's Section 106 regulations, the APE must include "the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist" (36 C.F.R. § 800.16(d)). Multiple consulting parties have stated that the North Shores permit fails to include the proposed construction of homes, septic, fields, roads, and driveways that would not occur "but for" the construction of the marina and the groundwater drawdown area (Match-E-Be-Nash-She-Wish Band's Tribal Historic Preservation Officer, Comments for consultation for the Permit No. LRE-2010-00304-52-S17-2). The proposed construction activities are dependent upon the issuance of the Army Corps Permit for the marina development, and the Match-E-Be-Nash-She-Wish Band asserts that all of the development activities will "directly or indirectly" cause alteration of the character of the Kalamazoo River Watershed and surrounding viewsheds, including the mouth of the Kalamazoo River. Arguably, the entire mouth of the Kalamazoo River traditional cultural landscape falls within the APE, as well as additional reaches of the Kalamazoo River upstream.

6.2 Some Tribally Identified Adverse Effects

During one interview for this study, JL, for one, raised concerns as to the negative impacts the marina may have on sturgeon:

Adding a marina at the river mouth would add more boat traffic to the area. Every lake sturgeon utilizing the Kalamazoo River at any point in the year must pass by where the marina is being proposed. The act of constructing and maintaining the marina could have negative effects on sturgeon and possibly make them avoid the Kalamazoo River due to pounding of sheet metal or dredging activities. Juvenile lake sturgeon are not the best swimmers and we know very little about where they go after drifting from

the spawning grounds. Any flow alteration at the mouth or pipes that allow sturgeon to enter may have adverse effects on their migration to Lake Michigan.

JL also raised concerns about the current impacts from historic development that, cumulatively, could increase was the marina is constructed:

Dredging and shoreline development of the lower section of the Kalamazoo River has diminished the amount of juvenile lake sturgeon habitat. If conditions are not suitable in the river for juvenile lake sturgeon they would most likely continue to move out into Lake Michigan which is less productive, resulting in less resources available for young sturgeon and could negatively impact their fitness and survival.

Another interviewee during the study, SM, spoke of a need to maintain the feeling and character of the area in the face of development:

Well it [the Kalamazoo River Mouth] is important to us, and it should be important to everybody, not only me and you and the Indians, it should be important to white people, to other Michiganders why it's important. It isn't just a resource for them to have their summer cottages there because it's a beautiful place. But I always think back to before everybody was there, it must have really been beautiful then in the old ways. I wish they could respect that water because the more people that come and dump their sewage, garbage, oil on our water—you know this from the all water awareness from the [protests] out in the Dakotas a couple of years ago, everybody knows about it now, but we have to make our own area here and be aware of the history of this place, not just what they can build or improve or change. Or they think enhance, or by enhancing that area is not for the benefit of anybody except themselves...that area, they took it from us already, they don't need to take it again and again and again, and do with it what they want. They have some obligation to keep it natural, it's too beautiful, it's too precious to confiscate for their own ends...

SM concluded that, put simply, development of a marina would likely negatively impact the cultural activities still conducted at the site:

It would be the place our ancestors gathered for centuries and centuries and centuries, it would be the place we can feel at home and feel but we're home. We know this is the place our ancestors were, we know that. And it's important for us to have access to it. I can't have access to it with a bunch of millionaire yachts parked out there, I wouldn't feel comfortable doing a sweat lodge out there or having a naming ceremony or marriage ceremony or I wouldn't feel comfortable about being buried there.

On top of these potential direct and indirect effects caused by the marina's construction, there are compounding cumulative effects from the industry in the area negatively impacting cultural resources, particularly fish. One Match-E-Be-Nash-She-Wish Band member, LS, expressed this fact during an interview for this study:

On the Kalamazoo and Grand River as a kid, probably 12-15, we did fish a few times in the big rivers, but we gave any fish we caught away to people who would eat them. Even then we knew the rivers were polluted from industry, agricultural runoff and

sewage. So we stayed away from the Grand River and Kalamazoo River for the most part, just for fun, even though we knew better. My dad didn't like us to fish unless we planned on eating the fish. I don't ever remember eating a fish my brothers and I caught from the Grand River or the Kalamazoo River.

JF, Pokagon Band member, also speaks about the negative cumulative impacts as a result of development:

It is my feeling but that north side where the development is going, that property probably should have been left alone. If anything, not such a heavy effort to put a big road in there and plot out the entire area and dig in a marina, it seems really unnecessary. It just seems really unnecessary. I'm sure you've seen the aerial photographs of all that out there, you can see it's just a big scar on that whole area. It doesn't look like it wants to be there. In my personal response to that whole thing is the Kalamazoo River mouth is the last undeveloped river mouth on this side of the state. You can go all the way down to the Michigan City area, or New Buffalo, I think is the town up that has some border, has a major river in it. From that point on, all the way up to the Mackinac Bridge. All the major river mouths have been developed to pieces.

These various issues are not all encompassing, and there are likely other areas of concern not identified during this study, in no small part because this study focused on identifying the mouth of the Kalamazoo River TCP and assessing its eligibility. A specific study to identify adverse effects, as is suggested below, would serve to much more effectively address these presented concerns.

6.3 Recommendations

Based on the accounts and concerns found within this report, there is likely a strong potential for a variety of adverse impacts that will need to be considered in Section 106 and NEPA review before the marina project. We recommend that USACE-Detroit consult closely with the Match-E-Be-Nash-She-Wish Band to address the concerns expressed in this report, and to identify any other impacts there may be to the TCP and its cultural values, cultural resources, and the tribal community that ascribes value to it. Through tribal interviews and ethnographic research, this report suggested that the viability of the tribe's cultural, spiritual, and physical wellbeing is intimately tied to the Kalamazoo River, and to the mouth specifically. The Kalamazoo River continues to play a vital role to the Match-E-Be-Nash-She-Wish Band through lake sturgeon rehabilitation, hunting and trapping, wild rice reseeding, and the historical mound burial sites. Despite the previous manipulation of the mouth of the river by the Army Corps, the TCP encompassing the mouth of the Kalamazoo River retains its integrity in the eyes of the Match-E-Be-Nash-She-Wish Band community. However, the potential for the marina to negatively affect this integrity, as well as the egress and ingress of sturgeon into the river, in particular, are things that should not be taken lightly. Given these ongoing concerns, these issues should be addressed in Section 106 review, and in environmental impact analysis under NEPA.

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