



The Saginaw Chippewa Indian Tribe

PLANNING DEPARTMENT

7070 EAST BROADWAY

MT. PLEASANT, MICHIGAN 48858

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November 20, 2012

Mary P. Logan
Remedial Project Manager
U.S. Environmental Protection Agency Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604-3590

Re: Tribal concerns for culturally significant sites within the Tittabawassee River,
Saginaw River & Bay Site, Michigan (Site)

Dear Ms. Logan:

The Bureau of Indian Affairs and the Saginaw Chippewa Indian Tribe of Michigan (Tribe) appreciates the efforts of the United States Environmental Protection Agency (EPA) as you work towards a comprehensive evaluation of contamination in the Tittabawassee River and Saginaw River and Bay and associated floodplains. This letter focuses on Tribal historic preservation concerns and culturally significant sites relevant to the Tittabawassee River and Saginaw River and Bay area and provides a brief introduction to sites of tribal interest for EPA's consideration.

The Tribe is concerned about the potential unearthing of culturally significant artifacts and/or remains. An accidental discovery plan and proper protocol needs to be in place prior to any earth moving. Consultation with appropriate Tribal contacts and the State Historical Preservation Office will identify key personnel to establish a chain of command. Also, appropriate agencies need to be identified and contact information provided in this plan.

The Ziibiwing Cultural Center, although not an official Tribal Historic Preservation Office has, in the past acted in this capacity. As such, they have provided some historic maps and an inventory of culturally significant sites relevant to the Tittabawassee River and Saginaw River and Bay area.

The Tribe requests that EPA consider the appropriate and applicable statutes and any implementing regulations that may apply to cultural resources, archeological and historical sites presently known, suspected or that may be discovered in Tittabawassee River and Saginaw River and Bay site.

- The National Historic Preservation Act (NHPA), Section 106 outlines the requirements for compliance. Please see the attachments and websites provided by Ziibiwing Cultural Center. These should provide a valuable resource, but not be considered a comprehensive report for compliance purposes.
- American Indian Religious Freedom Act (42 U.S.C. §§1996, et seq.) - The U.S. must "protect and preserve for American Indians their inherent right of freedom to believe, express [their] traditional religions." The Saginaw Chippewa Indian Tribe of Michigan is a Trustee. Thus, any response action selected for this Site must meet this statute.
- Archaeological Resources Protection Act of 1979 (16 U.S.C. §§470aa, et seq.) and 43 C.F.R. §§7.1 et seq. - The Act provides for the protection of archeological resources located on public and tribal lands and establishes criteria which must be satisfied for any excavation or removal of archeological resources. The Act's definition of "public lands" includes the National Wildlife Refuge System (NWRS), which would include the Shiawassee NWR. 16 U.S.C. §470bb (3) The Federal land manager, as defined in the Act, must approve any excavation or removal. Note there are reported/known archeological sites/historical sites on the Shiawassee NWR.
- Native American Graves Protection and Repatriation Act (25 U.S.C. §§3001, et seq.) and 43 C.F.R. Part 10 - This Act establishes requirements for human remains and cultural items. This statute is applicable if Native American remains or cultural items are discovered during a response action.
- Executive Order 12962 - This EO requires federal agencies in cooperation with States and Tribes to improve the quality, function, productivity and distribution of aquatic resources for increased recreational fishing opportunities including "fostering sound aquatic conservation and restoration endeavors to benefit recreational fisheries."

Resources and materials provided (as attachments herein) by the Saginaw Chippewa Indian Tribe of Michigan Ziibiwing Cultural Center include:

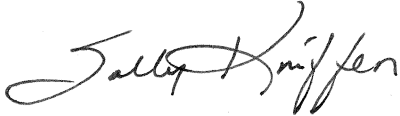
- *Advisory Council on Historic Preservation's* <http://www.achp.gov/> website.
- A list of tribal contacts within present day tribes associated with Indian Land Cessions 1784-1894 (attachment). The tribes mentioned in this attached list are from *Andrews Cultural Resources Publication an Inventory* which was performed in 1997 (attachment).
- Maps from *Archeological Atlas of Michigan [by] Wilbert B. Hinsdale...* (attachment)
- And updated map from the Tribal GIS department (attachment)

We appreciate your consideration of the attached materials as well as the appropriate authorities. By providing this information, the Tribe anticipates that our concerns can be considered early in EPA's efforts to comprehensively investigate and address risks to public health and natural resources resulting from the release of hazardous substances. We look forward to providing any assistance regarding cultural resources and archeological and historical sites that should be considered in selecting remedial

alternatives within Tittabawassee River and Saginaw River and Bay site including floodplains and associated natural resources.

We appreciate EPA's efforts to work closely with the Tribe at this site. Please feel free to contact Sally Kniffen, Environmental Specialist, for additional information or assistance.

Respectfully Submitted,

A handwritten signature in cursive script, reading "Sally Kniffen".

Sally Kniffen

Environmental Specialist

The Saginaw Chippewa Indian Tribe of Michigan

Attachments

cc: Judie Alfano - MDEQ
Charlie Chandler – BIA
Joseph Haas - USFWS
Todd Konechne - Dow
Allan Taylor - MDEQ

counties of interest (Bay, Midland, and Saginaw). A review of Michigan's Natural Features Inventory (MNFI 2011) indicates 13 state endangered species and 24 state threatened species have the potential to occur in the counties of interest. Additional details are described in Tables 3.5 through 3.7.

Counties of documented occurrence only include those counties of interest (Bay, Midland and Saginaw) and their adjacent counties (Arenac, Clare, Clinton, Genesee, Gladwin, Gratiot, Isabella, Shiawassee, and Tuscola). The natural community associations listed were obtained from the MNFI Rare Species Explorer (MNFI 2007). Determinations for potential species presence in Segment 2 sediments were based upon documented occurrences in Midland County, the location of Segment 2, and the species habitat requirements. For the purpose of this review, species presence in Segment 2 is limited to the utilization of habitat that is located within the river (i.e. sediment and water) or along the banks.

3.5 Cultural and Historic Resources

The National Historic Preservation Act (NHPA), Section 106 lays out a review process designed to ensure that historic properties are considered during Federal project planning and execution. Specifically Section 106 stipulates that federal actions including CERCLA are:

“..required to take into account the effects of remedial activities on any historic properties included on *or eligible for inclusion on* the National Register of Historic Places.” (USEPA 1989)

The National Register of Historic Places lists:

“districts, sites, buildings, structures, and objects that are significant in American history, architecture, archeology, engineering, and culture.” (USEPA 1989)

Thus, in addition to structures, Section 106 includes a requirement to consider cultural resources including archeological or culturally significant artifacts. This section describes requirements under Section 106, identifies the steps that have been taken to date and outlines future activities to comply with these requirements. The entity with responsibility for compliance with Section 106 would be EPA in this case.

3.5.1 Steps in Complying with NHPA

To comply with the NHPA, a first step is identification of cultural resources within the study area that are included on, or eligible for inclusion on, the National Register. If such resources are found, the second step is to identify the possible effects of proposed remedial activities on those resources. If there is potential for adverse effects on the resource, the EPA must consider whether there are feasible alternatives to the planned action that would avoid adverse effects. Where adverse effects cannot be avoided, the NHPA requires measures be taken to minimize or mitigate the potential effects. In describing these steps EPA (1989) states:

“If, at any point, the conclusion is reached that cultural resources are not present or will not be affected, no further investigation is necessary (see Exhibit 4-1).” (USEPA 1989)

3.5.2 Applicability of Section 106 to Segment 2 Work

Because Segment 2 is focused on in channel work and the river banks, no structures are anticipated to be of concern. However, Section 106 applies to both onsite activities and to offsite activities needed to address the site including access roads. Thus areas adjacent to Segment 2 sediments are considered here. In addition, cultural resources could include archeological or culturally significant artifacts which could be present within areas accessed during the investigation or remedial process.

3.5.3 Identification of Historic or Culturally Significant Resources

Resources for identifying either known or potential cultural or historic resources include:

- National Register of Historic Places
- Advisory Council on Historic Preservation
- State Historic Preservation Officer
- Local historic districts
- Native American resources

A search for properties within Midland and Saginaw County did not identify any sites on the National Register of Historic Places adjacent to or within the Segment 2 action area.¹² Specifically, the only properties on the list within Midland and Saginaw Counties were the Alden Dow House and Studio and the Herbert H. Dow house in Midland, which are not located near the Segment 2 areas to be addressed in association with this response proposal

3.5.4 Accidental Discovery Plan

In addition to the discussions and research described above, an accidental discovery plan will be prepared to address any unanticipated findings of archeological or cultural significance. To prepare such a plan, Dow will work with the Agencies to prepare a straightforward plan that will set out requirements in the event that artifacts of archeological, cultural, or historical significance are discovered during activities in Segment 2.

3.6 Evaluating the Basis for Action

This section evaluates the basis for action in Segment 2, as determined by potential exposure and risks to human health and the environment resulting from the presence of PCOIs and SCOIs in sediments and bank soils. The NCP (40 C.F.R. §300.415(b)(2)(iv)) sets forth goals to reduce the actual and potential exposures and transport risks at contaminated sites. The overall objective of this Segment 2 Response Proposal is consistent with the NCP and will inform the basis for action in Segment 2. Segment 2 will also be included in Task 10 of the AOC/SOW, the post-response residual risk assessment (RRA). The RRA, which will be initiated after completion of the Segment 2 response actions described herein, will be conducted in accordance with EPA guidance included in Section VIII D of the AOC/SOW. The outcome of the

¹² <http://tps.cr.nps.gov/nhl/result2.cfm>

List of Contacts within Present Day Tribes Associated with Indian Land Cessions from 1784-1894

Bad River Band of the Lake Superior Tribe of Chippewa Indians of the Bad River Reservation- Ms. Edith Leoso, THPO, Bad River Band of the Lake Superior Chippewa Tribe, P.O. Box 39, Chief Blackbird Center, Odanah, WI 54861

Bay Mills Indian Community- Paula Carrick, Bay Mills History Department, 12140 W. Lakeshore Drive, Brimley, Michigan 49715

Boise Fort Band (Nett Lake) of the Minnesota Chippewa Tribe- Ms. Rosemary Berens, NAGPRA Contact, Boise Fort Band of Chippewa, Heritage Center and Cultural Museum, 1500 Boise Fort Road, Tower, MN 55790

Chippewa Cree Indians of the Rocky Boy's Reservation of Montana- Mr. Alvin Windyboy, Chippewa Cree Tribe of the Rocky Boy's Reservation of Montana- 31 Agency Square, Box Elder, MT. 59521

Fond du Lac Band of the Minnesota Chippewa Tribe- Mr. Jeff Savage, Museum Director and NAGPRA Contact, Fond du Lac Band of Lake Superior Chippewa, Fond du Lac Center, 1720 Big Lake Road, Cloquet, MN 55720

Grand Portage Band of the Minnesota Chippewa Tribe- Grand Portage Tribal Council- ATTN: Chairman, P.O. Box 428, Grand Portage, MN 55605

Grand Traverse Band of Ottawa and Chippewa Indians- Cindy Patek, Eyaawing Museum & Cultural Center, 2605 N. West Bayshore Drive, Peshawbestown, MI 49654

Keweenaw Bay Indian Community- Chris Chosa, 16429 Beartown Road, Baraga, MI 49908

Lac Courte Oreilles Band of Lake Superior Chippewa Indians- Mr. Jerry Smith, Lac Courte Oreilles Band of Lake Superior Chippewa, 13394 W. Trapania Road, Bldg No. 1, Hayward, WI 54843

Lac du Flambeau Band of Lake Superior Chippewa Indians of the Lac du Flambeau Reservation of Wisconsin- Ms. Melinda Young, Alternate NAGPRA Contact, Lac du Flambeau Band of Lake Superior Chippewa Indians, P.O. Box, 67, Lac du Flambeau, WI 54538

Lac Vieux Desert Band of Lake Superior Chippewa Indians- Giwégiizhigookway Martin, P.O. Box 249, Watersmeet, MI 49969

Leech Lake Band of the Minnesota Chippewa Tribe- Ms. Gina Lemon, THPO and NAGPRA Contact, Leech Lake Band of Ojibwe, Tribal Historic Preservation Office, 115 6th Street, NW, Suite E, Cass Lake, MN 56633

Mille Lacs Band of the Minnesota Chippewa Tribe- Ms. Elisse Aune, NAGPRA Contact, Mille Lacs Band of Ojibwe Assembly, 43408, Oodena Drive, Onamia, MN 56359

Minnesota Chippewa Tribe- Mr. Brian Brunelle, Minnesota Chippewa Tribe, P.O. Box 217, Cass Lake, MN 56633

Red Cliff Band of the Lake Superior Chippewa Indians of Wisconsin, Mr. Larry Balber, Red Cliff Band of the Lake Superior Chippewa Indians, 88385 Pike Road, Hwy 13, Bayfield, WI 54814

Red Lake Band of Chippewa Indians- Mr. Floyd Jourdain, Chairperson, Red Lake Band of Chippewa Indians, Minnesota, P.O. Box 550, Red Lake, MN 56671

Sault Ste. Marie Tribe of Chippewa Indians- Mr. Cecil E. Pavlat Sr, 523 Ashmun Street, Sault Ste. Marie, MI 49783

Sokaogon Chippewa Community- Mr. Chris Quade, NAGPRA Contact, Sokaogon Chippewa Community, 3051 Sand Lake Road, Crandon, WI 54520

St. Croix Chippewa Indians of Wisconsin- Ms. Wanda McFaggen, NAGPRA Contact, St. Croix Chippewa Indians of Wisconsin, 24663 Angeline Ave, Webster, WI 54893

Turtle Mountain Band of Chippewa Indians of North Dakota- Mr. Kade Ferris, THPO, Turtle Mountain Band of Chippewa Indians of North Dakota, Highway 5 West, Belcourt, ND 58316

White Earth Band of the Minnesota Chippewa Tribe- Mr. Mike Swan, Natural Resources Director, White Earth Band of the Minnesota Chippewa Tribe, 41044 S. Ice Cracking Road, Ponsford, MN 56575

Advisory Council on Historic Preservation- Martha Catlin, Advisory Council on Historic Preservation, 1100 Pennsylvania Avenue NW- Room 803, Washington, DC 20004

William Johnson, Curator
Ziibiwing Center of Anishinabe Culture & Lifeways
6650 E. Broadway
Mt. Pleasant, Michigan 48858
Phone: (989) 775-4730
Toll Free: 1-800-225-8172 Ext. 1-54730
Fax: (989) 775-4770
Email: wjohnson@sagchip.org
Website: www.sagchip.org/ziibiwing

MICHIGAN—Present-Day Tribes Associated with Indian Land Cessions 1784-1894

MAP #	MAP Name	State	County	Tribe Named in Treaty	Present-Day Tribe
261	Wisconsin 1, Michigan 1	MI	Menominee	Chippewa of the Mississippi and Lake Superior	Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin
261	Wisconsin 1, Michigan 1	MI	Menominee	Chippewa of the Mississippi and Lake Superior	White Earth Band of Minnesota Chippewa Tribe, Minnesota
219	Michigan 1, Wisconsin 1	MI	Menominee	Menomini	Menominee Indian Tribe of Wisconsin
111	Michigan 1	MI	Midland	Chippewa	Bad River Band of the Lake Superior Tribe of Chippewa Indians of the Bad River Reservation, Wisconsin
111	Michigan 1	MI	Midland	Chippewa	Bay Mills Indian Community, Michigan
111	Michigan 1	MI	Midland	Chippewa	Bois Forte Band (Nett Lake) of the Minnesota Chippewa Tribe, Minnesota
111	Michigan 1	MI	Midland	Chippewa	Chippewa-Cree Indians of the Rocky Boy's Reservation, Montana
111	Michigan 1	MI	Midland	Chippewa	Fond du Lac Band of the Minnesota Chippewa Tribe, Minnesota
111	Michigan 1	MI	Midland	Chippewa	Grand Portage Band of the Minnesota Chippewa Tribe, Minnesota
111	Michigan 1	MI	Midland	Chippewa	Grand Traverse Band of Ottawa and Chippewa Indians, Michigan
111	Michigan 1	MI	Midland	Chippewa	Keweenaw Bay Indian Community, Michigan
111	Michigan 1	MI	Midland	Chippewa	Lac Courte Oreilles Band of Lake Superior Chippewa Indians of Wisconsin
111	Michigan 1	MI	Midland	Chippewa	Lac du Flambeau Band of Lake Superior Chippewa Indians of the Lac du Flambeau Reservation of Wisconsin
111	Michigan 1	MI	Midland	Chippewa	Lac Vieux Desert Band of Lake Superior Chippewa Indians, Michigan
111	Michigan 1	MI	Midland	Chippewa	Leech Lake Band of the Minnesota Chippewa Tribe, Minnesota
111	Michigan 1	MI	Midland	Chippewa	Mille Lacs Band of the Minnesota Chippewa Tribe, Minnesota
111	Michigan 1	MI	Midland	Chippewa	Minnesota Chippewa Tribe, Minnesota
111	Michigan 1	MI	Midland	Chippewa	Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin
111	Michigan 1	MI	Midland	Chippewa	Red Lake Band of Chippewa Indians, Minnesota
111	Michigan 1	MI	Midland	Chippewa	Saginaw Chippewa Indian Tribe of Michigan
111	Michigan 1	MI	Midland	Chippewa	Sault Ste. Marie Tribe of Chippewa Indians of Michigan
111	Michigan 1	MI	Midland	Chippewa	Sokaogon Chippewa Community, Wisconsin
111	Michigan 1	MI	Midland	Chippewa	St. Croix Chippewa Indians of Wisconsin
111	Michigan 1	MI	Midland	Chippewa	Turtle Mountain Band of Chippewa Indians of North Dakota
111	Michigan 1	MI	Midland	Chippewa	White Earth Band of Minnesota Chippewa Tribe, Minnesota
396	Michigan 2	MI	Midland	Chippewa of Saginaw, Swan creek, and Black river	Saginaw Chippewa Indian Tribe of Michigan

MICHIGAN—Present-Day Tribes Associated with Indian Land Cessions 1784-1894

MAP #	MAP Name	State	County	Tribe Named In Treaty	Present-Day Tribe
238	Michigan 1	MI	Midland	Chippewa, Saginaw tribe	Saginaw Chippewa Indian Tribe of Michigan
205	Michigan 1	MI	Missaukee	Chippewa	Bad River Band of the Lake Superior Tribe of Chippewa Indians of the Bad River Reservation, Wisconsin
205	Michigan 1	MI	Missaukee	Chippewa	Bay Mills Indian Community, Michigan
205	Michigan 1	MI	Missaukee	Chippewa	Bois Forte Band (Nett Lake) of the Minnesota Chippewa Tribe, Minnesota
205	Michigan 1	MI	Missaukee	Chippewa	Chippewa-Cree Indians of the Rocky Boy's Reservation, Montana
205	Michigan 1	MI	Missaukee	Chippewa	Fond du Lac Band of the Minnesota Chippewa Tribe, Minnesota
205	Michigan 1	MI	Missaukee	Chippewa	Grand Portage Band of the Minnesota Chippewa Tribe, Minnesota
205	Michigan 1	MI	Missaukee	Chippewa	Grand Traverse Band of Ottawa and Chippewa Indians, Michigan
205	Michigan 1	MI	Missaukee	Chippewa	Keweenaw Bay Indian Community, Michigan
205	Michigan 1	MI	Missaukee	Chippewa	Lac Courte Oreilles Band of Lake Superior Chippewa Indians of Wisconsin
205	Michigan 1	MI	Missaukee	Chippewa	Lac du Flambeau Band of Lake Superior Chippewa Indians of the Lac du Flambeau Reservation of Wisconsin
205	Michigan 1	MI	Missaukee	Chippewa	Lac Vieux Desert Band of Lake Superior Chippewa Indians, Michigan
205	Michigan 1	MI	Missaukee	Chippewa	Leech Lake Band of the Minnesota Chippewa Tribe, Minnesota
205	Michigan 1	MI	Missaukee	Chippewa	Mille Lacs Band of the Minnesota Chippewa Tribe, Minnesota
205	Michigan 1	MI	Missaukee	Chippewa	Minnesota Chippewa Tribe, Minnesota
205	Michigan 1	MI	Missaukee	Chippewa	Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin
205	Michigan 1	MI	Missaukee	Chippewa	Red Lake Band of Chippewa Indians, Minnesota
205	Michigan 1	MI	Missaukee	Chippewa	Saginaw Chippewa Indian Tribe of Michigan
205	Michigan 1	MI	Missaukee	Chippewa	Sault Ste. Marie Tribe of Chippewa Indians of Michigan
205	Michigan 1	MI	Missaukee	Chippewa	Sokaogon Chippewa Community, Wisconsin
205	Michigan 1	MI	Missaukee	Chippewa	St. Croix Chippewa Indians of Wisconsin
205	Michigan 1	MI	Missaukee	Chippewa	Turtle Mountain Band of Chippewa Indians of North Dakota
205	Michigan 1	MI	Missaukee	Chippewa	White Earth Band of Minnesota Chippewa Tribe, Minnesota
205	Michigan 1	MI	Missaukee	Ottawa	Grand Traverse Band of Ottawa and Chippewa Indians, Michigan
205	Michigan 1	MI	Missaukee	Ottawa	Ottawa Tribe of Oklahoma
66	Michigan 1, Ohio	MI	Monroe	Chippewa	Bad River Band of the Lake Superior Tribe of Chippewa Indians of the Bad River Reservation, Wisconsin
89	Michigan 1	MI	Monroe	Chippewa	Bad River Band of the Lake Superior Tribe of Chippewa Indians of the Bad River Reservation, Wisconsin
66	Michigan 1, Ohio	MI	Monroe	Chippewa	Bay Mills Indian Community, Michigan
89	Michigan 1	MI	Monroe	Chippewa	Bay Mills Indian Community, Michigan

UNIVERSITY MUSEUMS, UNIVERSITY OF MICHIGAN

ARCHAEOLOGICAL ATLAS OF MICHIGAN

WILBERT B. HINSDALE



MICHIGAN HANDBOOK SERIES, NO. 4

University of Michigan Publications

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ANN ARBOR
UNIVERSITY OF MICHIGAN PRESS
1931

MIDLAND COUNTY

(Map 8)

The villages that were aligned along the Tittabawassee River from its juncture with other streams to form the Saginaw, in Saginaw County, extended into Midland. There were six villages within eight miles of the present city of Midland, one of them upon Pine River.

9 —

From the number of artifacts that have been reported, one might expect that more sites would have been found than are charted, but one village and a single group of three mounds are all the sites that can be given upon the Tittabawassee and the trail that followed its banks above Midland into Gladwin County. The trail along the Chippewa is referred to in notes upon Isabella County. In Mills Township there is a group of mounds marked "vague," which signifies uncertainty as to exact situation and number. A mound stood upon each side of the Chippewa near the center of Homer Township.

SITES IDENTIFIED

Villages	8
Burying grounds	2
Mounds	9

TOWNSHIPS

1. Warren	9. Greendale
2. Edenville	10. Lee
3. Hope	11. Homer
4. Mills	12. Midland
5. Geneva	13. Jasper
6. Jerome	14. Porter
7. Lincoln	15. Mount Haley
8. Larkin	16. Ingersoll

Sally, Kelly and Jessica,

This is the map book info for the maps in the attachments.

Author: Hinsdale, W. B. (Wilbert B.), 1851-1944.

Title: Archaeological atlas of Michigan [by] Wilbert B. Hinsdale...

Publication Info: Ann Arbor, Michigan: University of Michigan Library
2008

Availability: Where applicable, subject to copyright. Other restrictions on distribution may apply. Please go to <http://www.umd.umich.edu/> for more information.

Print source: *Archaeological atlas of Michigan [by] Wilbert B. Hinsdale...*
Hinsdale, W. B. (Wilbert B.), 1851-1944., McCartney, Eugene Stock, 1883-, Stevens, Edward J.
Ann Arbor: University of Michigan press, 1931.

Subject terms: Indians of North America -- Michigan
Names, Geographical -- Michigan.
Michigan -- Antiquities
Michigan -- Description and travel


URL: <http://name.umd.umich.edu/1265156.0001.001>
[unavailable for reprint]

Here are a couple clips of maps from an additional reference book, Atlas of Great Lakes Indian History edited by Helen Hornbeck Tanner, published by University of Oklahoma Press, 1987, ISBN 0-8061-2056-8

Indian Villages c. 1830
Michigan Territory. Indiana, Ohio

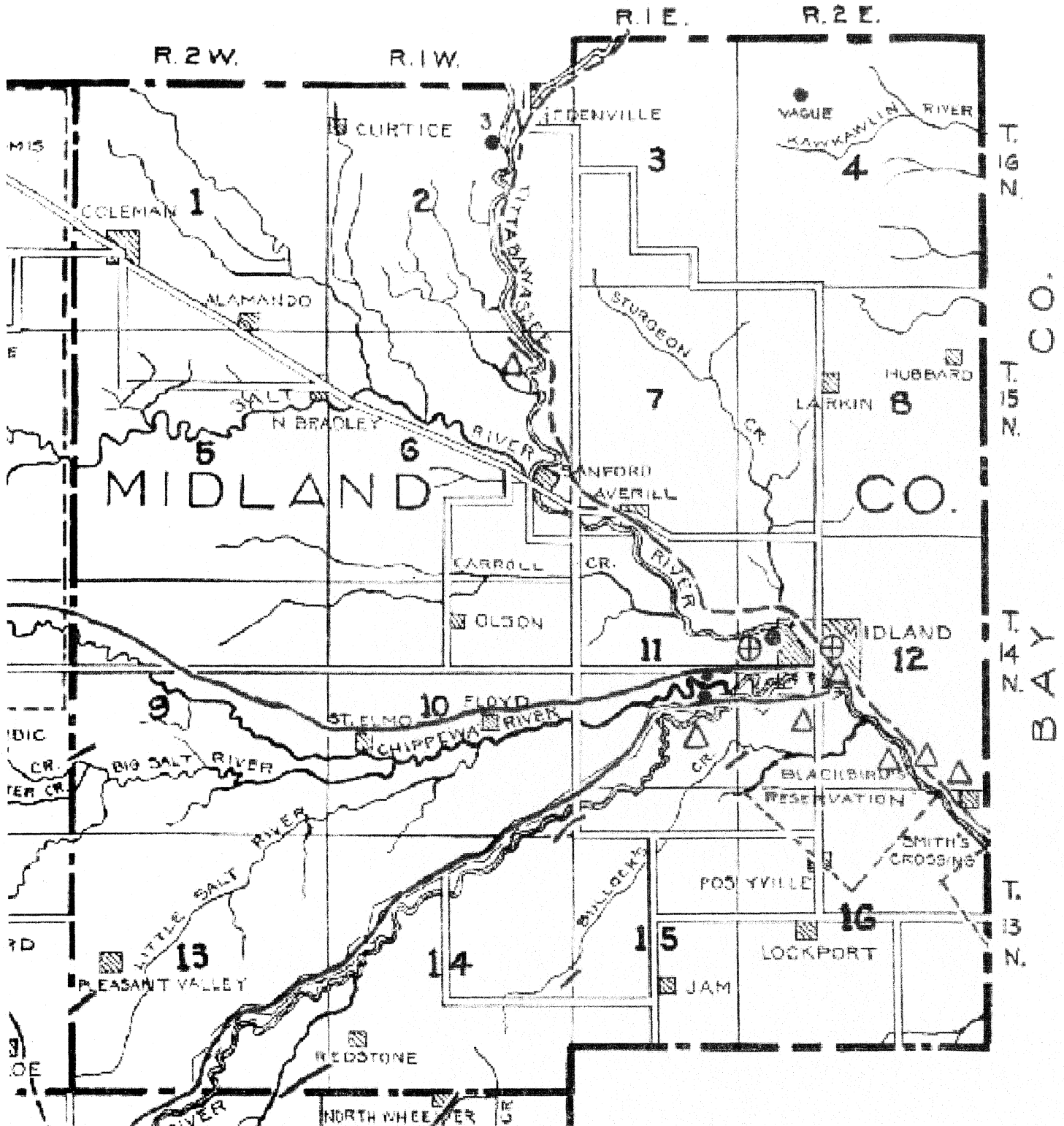
EXPLANATION OF CARTOGRAPHIC SYMBOLS

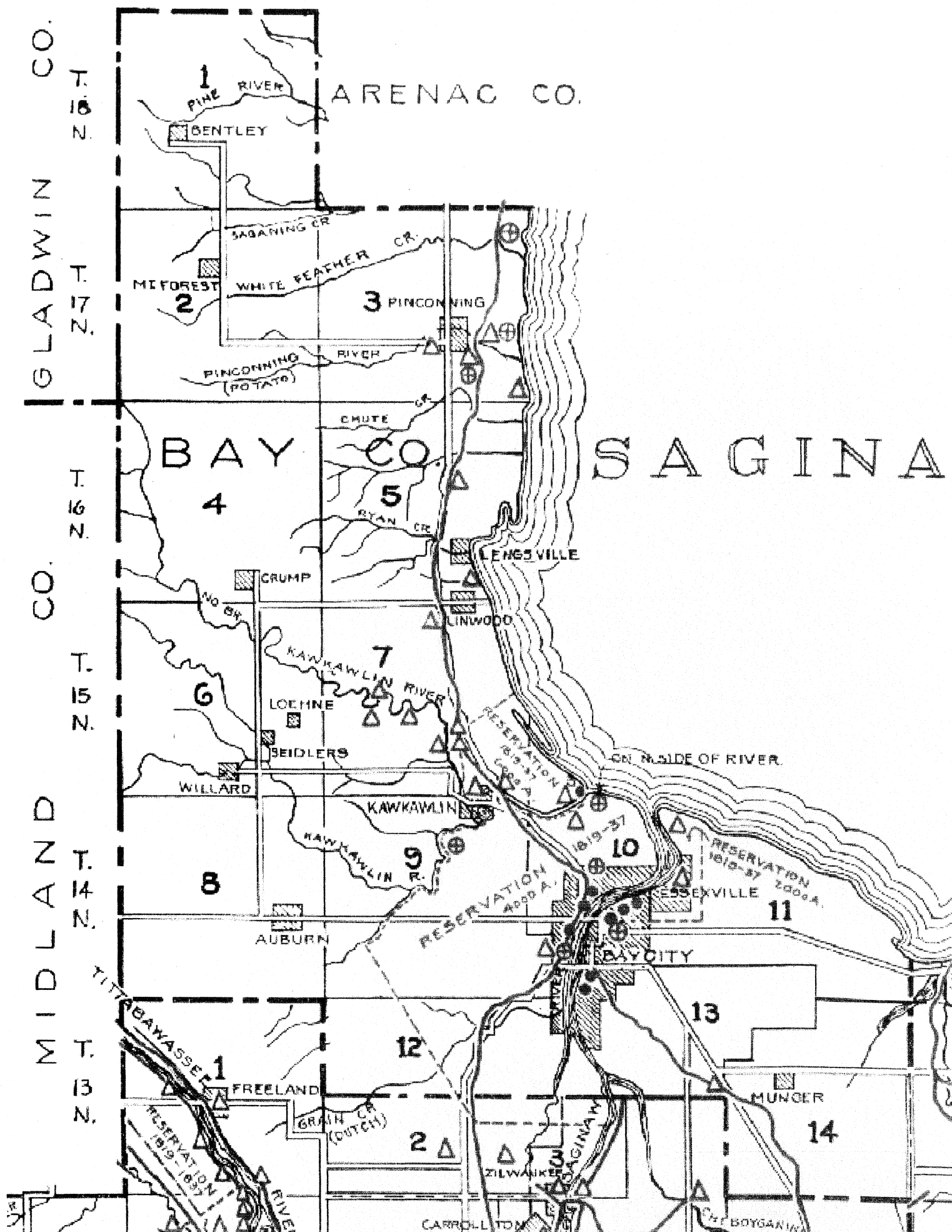
The numbers upon the maps indicate townships, which are listed in Chapter X, "Notes Upon the Archaeological Features of the Counties." The word "vague" beside a symbol indicates that the location was not determined nearer than a section of land.

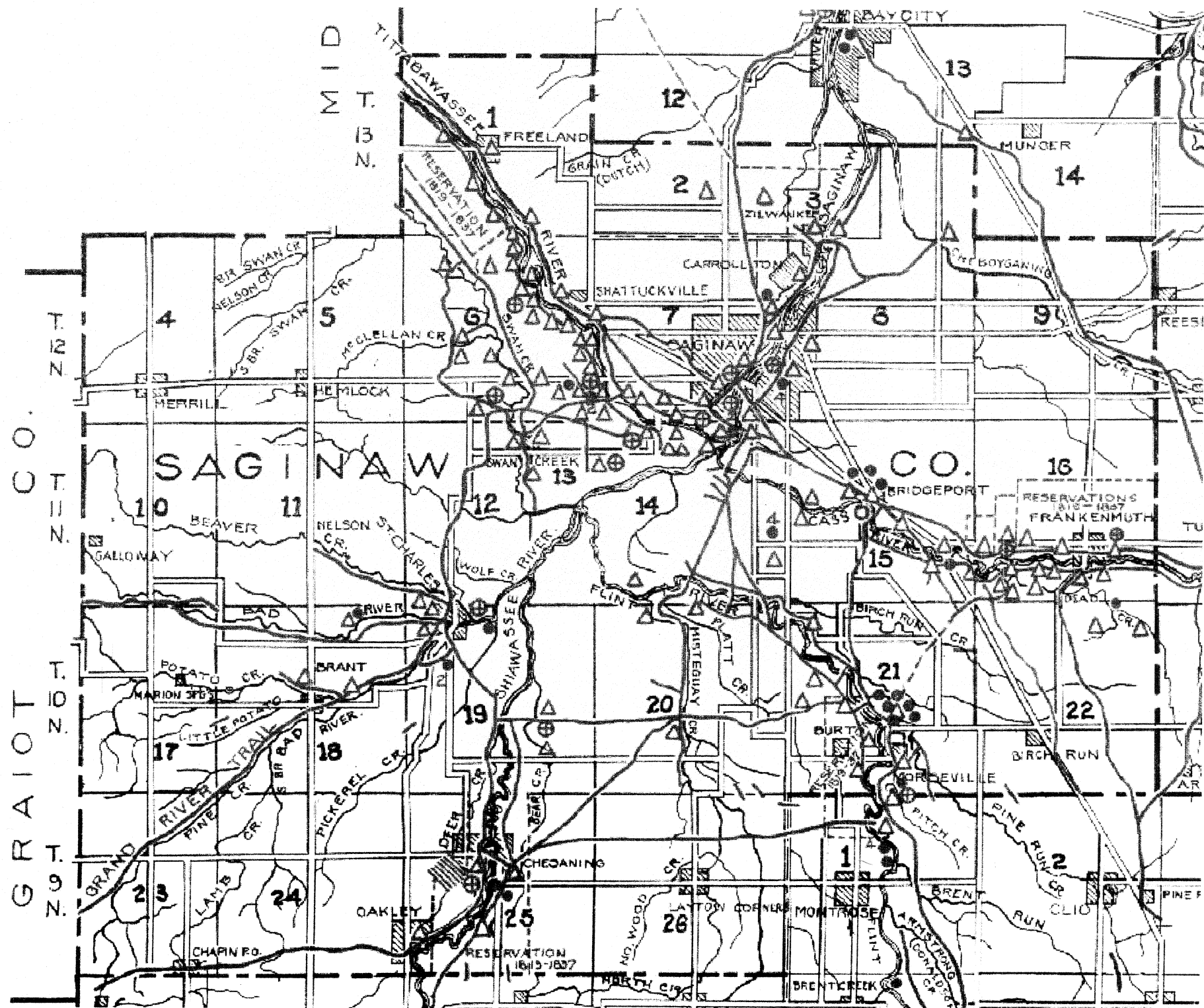
●	Mound		Irregular earthwork
●4	Figures indicate exact number of mounds in a group	▲	Village
●N	Letter N indicates that the number of mounds in group is undetermined	⊕	Burying ground
○	Circular inclosure	▨	Garden bed
◌	Incomplete circular inclosure	~~~~~	Trail
□	Rectangular inclosure	-----	Trail, location not accurately determined
◌	Incomplete rectangular inclosure	×	Ancient excavation for copper

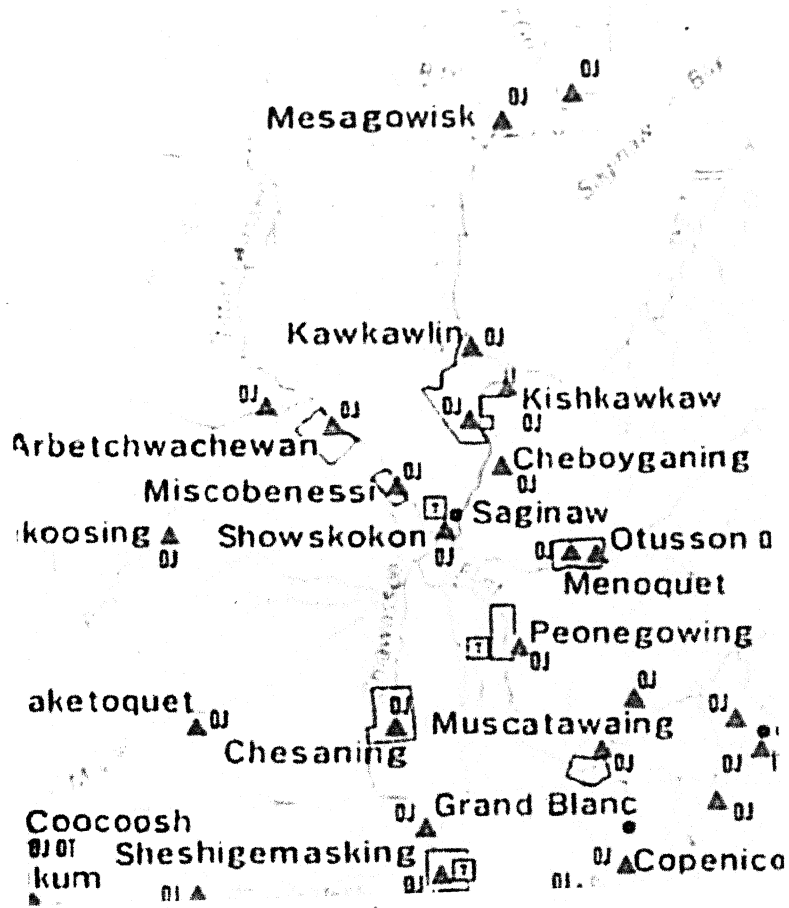
GLADWIN

CO.

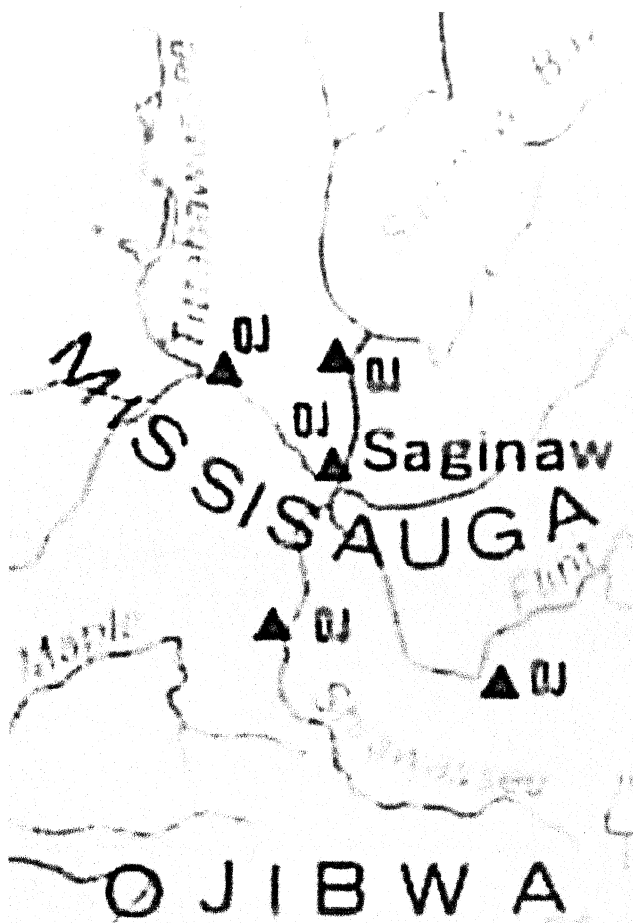








Indian Villages and Tribal Distribution c. 1768



Hope this helps out!

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