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USCG

1/13/2021

*Submitted via e-mail*

RE: Comments to the Visual APE for Proposed Bridge Replacement on the Missouri River near Bismarck/Mandan, North Dakota (ND SHPO Reference 16-0636).

Mr. McCaskey,

Friends of the Rail Bridge and Preservation North Dakota are providing this very brief historical overview and the following illustration of the heritage of the Missouri River Valley to demonstrate the need for comprehensive analysis of the potential effects of the proposed undertaking on cultural resources at a broader geographical scale including but not limited to a previously unidentified vernacular cultural landscape significant under NRHP Criteria for Evaluation A, B, C, and D.

The historic 1883 NPRR Rail Bridge is an iconic landmark within the Missouri River Valley of central North Dakota. Less than two miles north of the confluence of the Heart and Missouri Rivers, this place is a traditional and historical crossroads. For generations, abundant resources supported Native American communities up and down the River's east and west banks—ancestral villages of the Mandan, Hidatsa, and Arikara—and their trade routes. Famed captains of the Corps of Discovery, Meriweather Lewis and William Clark passed through here, wintering north at the mouth of the Knife River, and described this place and its people in compelling detail that captures the imagination of historians, school children, and tourists to this day. Indigenous trade networks drew the fur trade onto the Plains, expanding an already bustling economy with an ever-abundant supply of European trade goods. By the 1850s, westward expansion had followed the navigable waterways and America began to regard the Missouri River Valley as the hub of the "steamboat society." The US military established a presence, to pursue and protect such interests, ultimately defending the railroad companies and their speculators as they drew lines across ancestral homelands and dividing newly imposed tribal reservations.

The origin story of 19th Century Dakota as it unfolded within the Missouri River Valley is the story of westward expansion and the displacement of Native peoples. The climax of this story happens to be completion of the NPRR Rail Bridge in 1883. What is more incredible than this story itself, perhaps, is that the evidence of each moment in the permanent transformation of the Great Plains still stands in plain sight. To this day, a patchwork of natural areas, archaeological sites, historic structures, and buildings offer a rare and inspiring means to interpret and understand a rich and complex traditional, cultural, and historical heritage. These interconnected sites are historically significant and constitute a vernacular cultural landscape within the geographical boundary of the Northern Plains National Heritage Area and the Lewis & Clark National Historic Trail.

A reasonable place to begin understanding this historic narrative, embodied in the Missouri River Valley, would be any number of earth lodge **village sites** on the bluffs overlooking the river,

occupied by the Mandan at different times from AD1500 into the 19th Century. They include Scattered Village, Chief Looking's Village, and On-A-Slant. Other sites associated with these communities are known throughout the river valley and still hold considerable cultural value to descendants. One of the best-known examples is Crying Hill, a prominent landform on the west bank on the river known as a spiritual site among members of the MHA Nation. Lewis and Clark recorded evidence in their journals of 17th and 18th Century villages—largely abandoned by 1804 due to the spread of smallpox from contact with Euro-Americans.

As would be expected, the gradual encroachment of Euro-Americans in the decades to come brought tension. Along Apple Creek, south of Bismarck where the University of Mary now stands, is the site of an 1863 conflict between the US Army and the Dakota and Lakota. The **Apple Creek Fight**, also known as the Battle of Apple Creek, took place from July 30-August 1, 1863. Following the Dakota War in Minnesota in 1862, General Sibley had been given orders to retaliate and pursue and engage any Sioux Indians to the west, across Dakota Territory. This is "the only native fight of the 1863-1864 Punitive Campaigns in which the Dakota and Lakota chose the battlefield, met their aggressor, and held them off until they withdrew". In 2019, Historian Dakota Goodhouse and Dr. Mike Taylor, associate professor of Education at University of Mary, further characterized this site, also referred to as "The Bluff Where They Dig for Paint" as having, "played a significant role in that victory, the Battle of Apple Creek also adds to the legend of North Dakota, and to U.S. and Native American history—one that is often neglected or continually overlooked by many historians and scholars."

But western expansion was not deterred. When the NPPRR was created by an act of Congress in 1864, the belief in Manifest Destiny guided public policy. As stated in the NPPRR's Congressional land grant, "the United States shall extinguish, as rapidly as may be consistent with public policy and the welfare of the said Indians, the Indian titles to all lands falling under the operation of this act and acquired in the donation to the [road] named in this bill." By 1873, the NPPRR had reached Bismarck and the Treaty of Ft. Laramie (1851) had been amended to allow for construction of the railroad further west, through tribal lands on the Northern Plains. Because of the threat of tribal resistance, surveyors for the railroad were escorted west to the Yellowstone River by the US Army stationed at **Fort Abraham Lincoln** south of present-day Mandan on the west bank of the Missouri River. These men were under the command of Lt. Col. George Armstrong Custer—one of the most famous characters of the era. Fort Lincoln is also a known site/historic district and is the state's first state park complete with fort reconstructions, a reconstructed earth lodge village, and CCC-built museum.

The NPPRR overextended its finances and triggered the Panic of 1873—then the worst worldwide depression ever experienced. Construction ceased with Bismarck at the literal end of the line. In the interim, the company had received a portion of its land grant and, between Fargo and Bismarck, proceeded to build towns and sell off farmland to speculators. When construction of track resumed west of the Missouri River, the NPPRR was still without a proper crossing. Until completion of the Rail Bridge in 1882-1883, train cars were remarkably ferried across the river or, when winter ice was thick enough, temporary tracks would be laid across the frozen water to Mandan. The **Rail Bridge**, eagerly anticipated, was literally the linchpin in completion of the NPPRR. The Rail Bridge is a known site and has received DOE from SHPO that it is an NRHP-eligible property.

With the NPPRR promoting agricultural settlement of northern Dakota Territory and advertising the Homestead Act on an international scale, this region experienced an unprecedented boom in population, growth, and development. This came at great cost to those Native people already displaced. One gradual but direct result of the incursion of settlers was the formation of Indian

Schools. In 1908, the BIA opened the **Bismarck Indian School** on 255 acres overlooking the Missouri River from the east bank. The purpose of this and 27 other off-reservation Indian Schools was to assimilate Native youth into Euro-American culture and society. The School operated until the mid-1930s, having become a boarding school specifically for female students. It then became the National Guard headquarters known as Fraine Barracks, named for John H. Fraine, 10th Lt. Governor of North Dakota. Historic buildings from the Bismarck Indian School still remain and are in use at Fraine Barracks. These include the Adjutant General's Quarters, Fraser Hall, Boyd Hall, four residences, a garage, and several storage buildings. This is a known district eligible for the NRHP under Criterion A and C.

The Missouri River, as a life source supporting early agriculture; as a transportation corridor facilitating exchange of goods, culture, and ideas; as a low point on the horizon, offering strategic long-range views from its bounding bluffs; as a challenge for industrial development; and as an idyllic setting in which to live, is the natural feature that gives each chapter of the cultural landscape's decades-long history and the history of its component parts—a dynamic quality of interconnectedness.

On behalf of FORB and PND, we urge the USCG to expand the proposed visual APE following topographic lines that fully encompass the associated significant cultural resources within its viewshed, as illustrated in the accompanying map and photographs (Figures 1-11). Further, we call for the documentation, treatment, and assessment of potential effect(s), to acknowledge the historically significant vernacular cultural landscape of the Missouri River Valley and consider the impact of subtracting the Rail Bridge within the historic context we have provided herein. Methods of documentation and evaluation should be inter-disciplinary and, at minimum, consider impacts to the integrity of the vernacular cultural landscape that includes but may not be limited to the following archaeological and historical sites:

SITS#	Site Name
32MO031	Scattered Village
32BL3	Chief Looking's Village
CHFM038	Crying Hill
32MO26	On-A-Slant Village
32BLX0041	Apple Creek Fight
3MO141	Ft. Abraham Lincoln Historic District
32BL801/32MO1459	Bismarck-Mandan Rail Bridge
32BL599-619, 682	Fraine Barracks/Bismarck Indian School

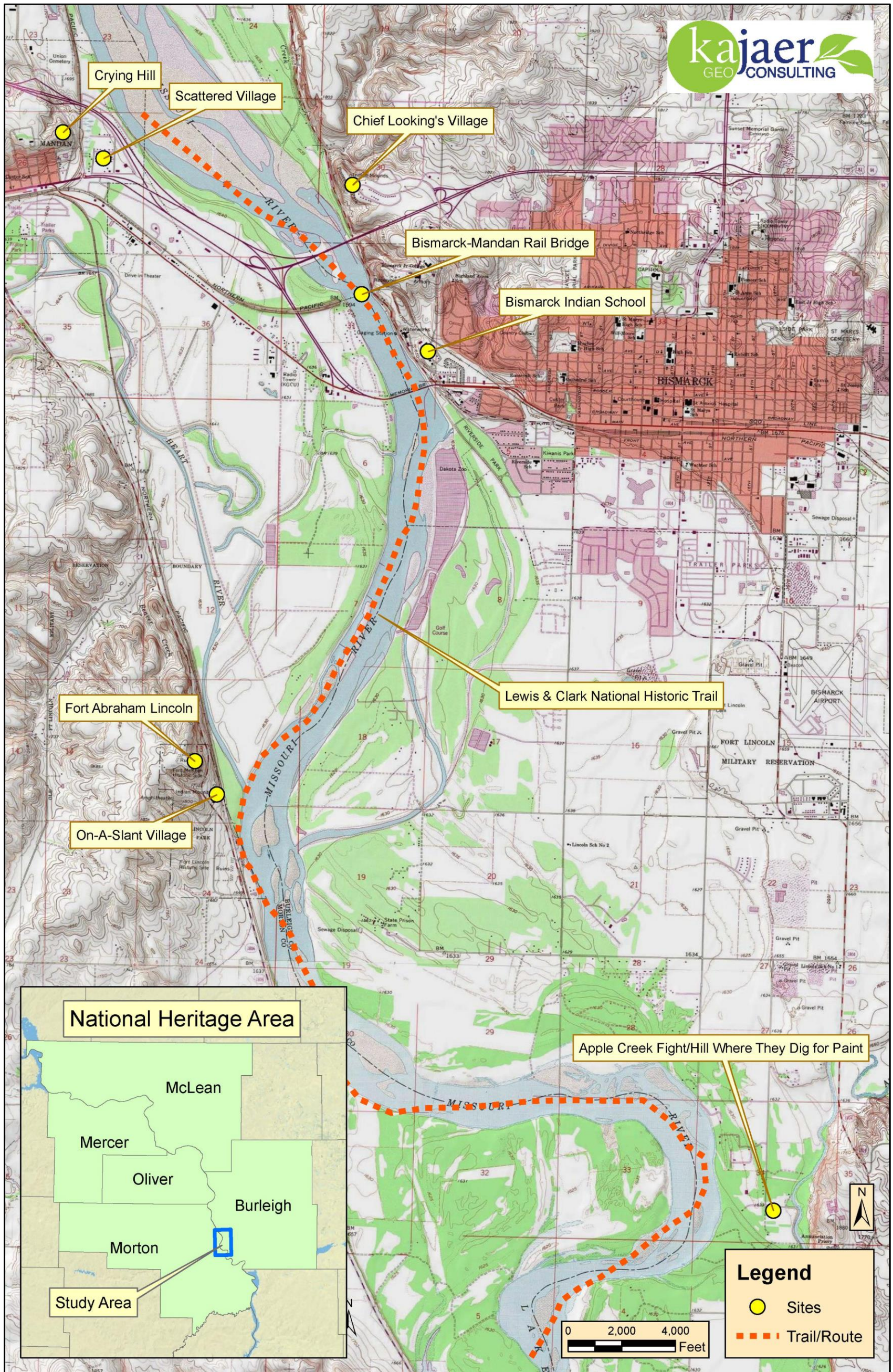
Respectfully,



Mark Zimmerman  
 President, Friends of the Rail Bridge



Emily Sakariassen,  
 President, Preservation North Dakota



Map 1: Missouri River Valley at Bismarck and Mandan, depicting interrelated sites within the viewed of the proposed Bridge Replacement on the Missouri River (ND SHPO Reference 16-0636) and within the context of the Northern Plains National Heritage Area and Lewis & Clark National Historic Trail. Our proposed study area would include these sites which contribute to a historically significant vernacular cultural landscape within the Missouri River Valley previously undocumented and unevaluated.



Figure 1: View southwest over the Missouri River Valley from Chief Looking's Village (32BL3). [https://www.tripadvisor.com/Attraction\\_Review-g49709-d10642829-Reviews-Chief\\_Lookings\\_Village-Bismarck\\_North\\_Dakota.html](https://www.tripadvisor.com/Attraction_Review-g49709-d10642829-Reviews-Chief_Lookings_Village-Bismarck_North_Dakota.html), accessed 111/2021.

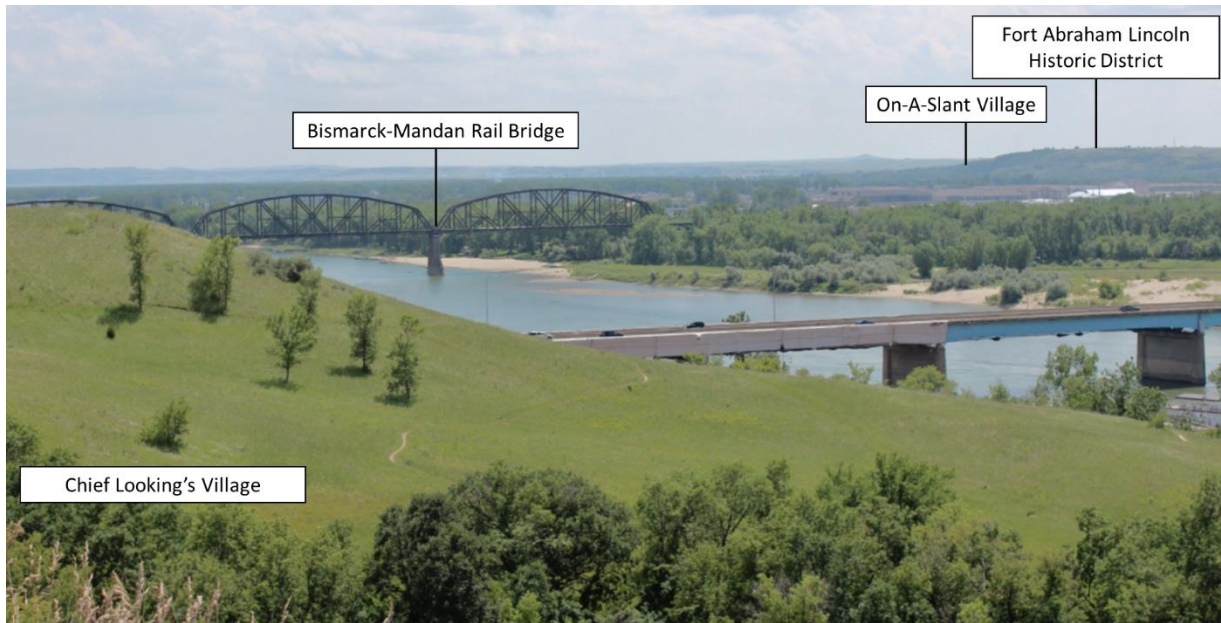


Figure 2: View southwest over the Missouri River from Chief Looking's Village (32BL3), depicting location of Bismarck-Mandan Rail Bridge (32BL801/32MO1459), On-A-Slant Village (32MO26), and Ft. Abraham Lincoln (32MO141) visible downriver. Original photo from [https://www.tripadvisor.com/Attraction\\_Review-g49709-d10642829-Reviews-Chief\\_Lookings\\_Village-Bismarck\\_North\\_Dakota.html](https://www.tripadvisor.com/Attraction_Review-g49709-d10642829-Reviews-Chief_Lookings_Village-Bismarck_North_Dakota.html), accessed 111/2021.

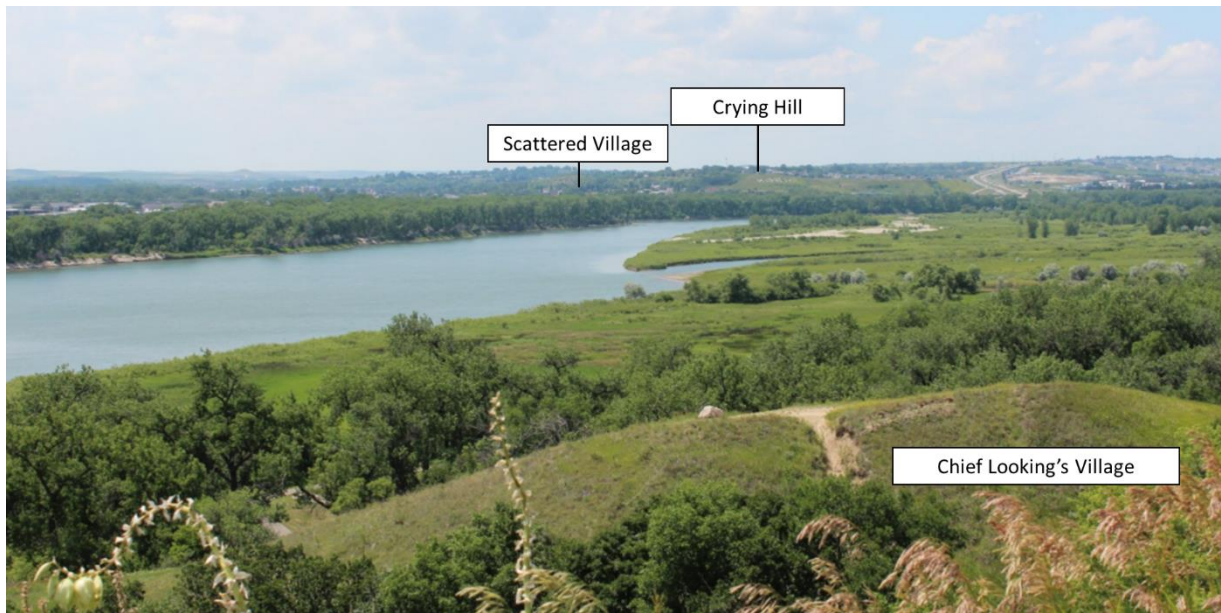


Figure 3: View northwest across the Missouri River Valley from Chief Looking's Village (32BL3) toward Scattered Village site (32MO31) and Crying Hill (CHFMO38). Original photo from [https://www.tripadvisor.com/Attraction\\_Review-g49709-d10642829-Reviews-Chief\\_Lookings\\_Village-Bismarck\\_North\\_Dakota.html](https://www.tripadvisor.com/Attraction_Review-g49709-d10642829-Reviews-Chief_Lookings_Village-Bismarck_North_Dakota.html), accessed 11/2021.



Figure 4: View southeast across the Missouri River Valley from On-A-Slant Village (32MO26) toward Whiskey Point, associated with the historic occupation of Ft. Lincoln (32MO141) and the site of the Apple Creek Fight (32BLX41). Photo by FORB, 2021.

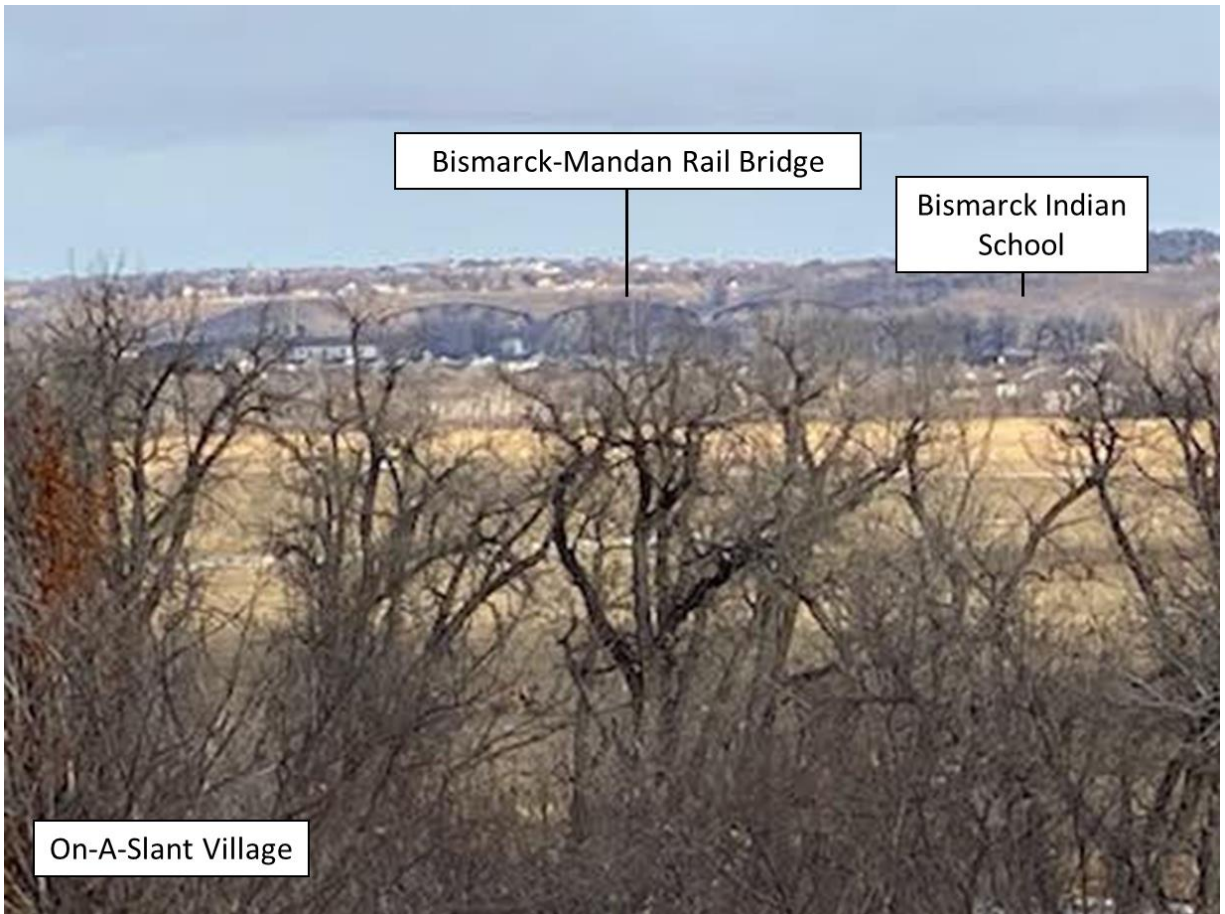


Figure 5: View northeast across the Missouri River Valley from On-A-Slant Village (32MO26) toward Bismarck, the Bismarck-Mandan Rail Bridge (32BL801/32MO1459) and location of the Bismarck Indian School (32BL599-619, 682) visible below the horizon. Photo by Preservation North Dakota, 2021.



Figure 6: View northeast across the Missouri River Valley from Ft. Lincoln (32MO141) to the Bismarck-Mandan Rail Bridge (32BL801/32MO1459) and Chief Looking's Village (32BL3). Photo by FORB, 2021.





Figure 7: View north-northeast across the Missouri River Valley from Ft. Lincoln (32MO141) to Crying Hill (CHFMO30). Photo by FORB, 2021.



Figure 8: View north-northwest from "the Bluff Where They Dig for Paint" showing the Bismarck-Mandan Rail Bridge (32BL801/32MO1459). Photo by FORB, 2021.



Figure 9: View west across the Missouri River Valley from "the Bluff Where They Dig for Paint" to On-A-Slant Village (32MO26) and Ft. Lincoln (32MO141). Photo by FORB, 2021.



Figure 10: View northeast from Ft. Lincoln (32MO141) showing Crying Hill (CHFMO38), Scattered Village (32MO31), Chief Looking's Village (32BL3), the Bismarck-Mandan Rail Bridge (32BL801/32MO1459), and Bismarck Indian School (32BL599-619, 682) on the horizon. Photo by FORB, 2021.

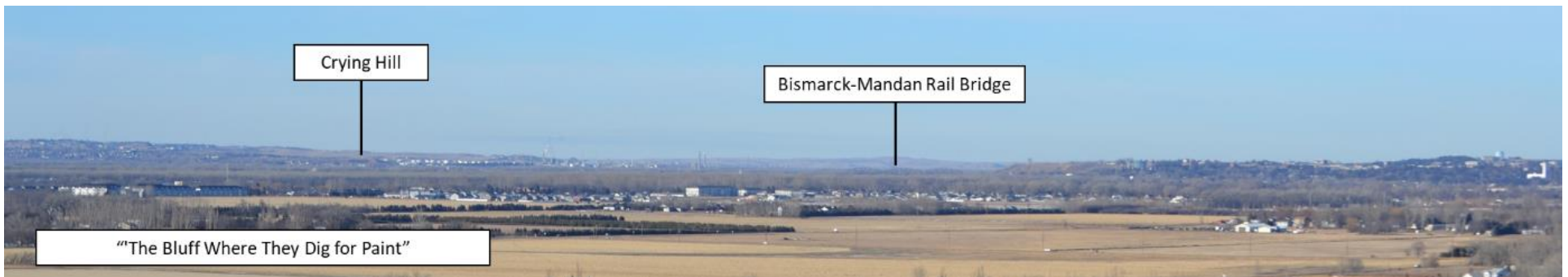


Figure 11: View north-northwest across the Missouri River Valley from "the Bluff Where They Dig for Paint". Crying Hill (CHFMO38) and the Bismarck-Mandan Rail Bridge (32BL801/32MO1459) visible on the horizon. Photo by FORB, 2021.