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STATE ARCHAEOLOGIST**

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**FILED WITH
Executive Secretary**

May 22, 2015

IOWA UTILITIES BOARD

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Iowa Utilities Board

Re: Docket No. HLP-2014-0001 (the Dakota Access Pipeline, a.k.a. Bakken Pipeline)

The Office of the State Archaeologist, in its historic preservation advocacy role per the Iowa Code (263B), offers the following comments concerning the Dakota Access Pipeline (DAPL) project and the likelihood construction activities associated with this pipeline will cause adverse effects to historic properties including archaeological sites.

Research by my office using available published information on the proposed project centerline buffered to 100 ft to each side suggests upwards of 8,000 acres of Iowa land will potentially be impacted, much of it prime farmland likely preserving significant archaeological sites. Our best estimate is less than 3 percent of this project area has been subject to professional archaeological survey. Nonetheless, in addition to potentially intersecting historically significant but currently unknown locations of 1800s-era Meskwaki camps in southwest Story County and possibly Blondeau's 1821 fur trading post in Des Moines County, it appears DAPL may also intersect the site of on-going excavations of the Mahaska County Mammoth findspot, which has to date yielded the partial remains of three individual mammoths. Additional research at this special place may yet demonstrate interaction of early Iowans with these Ice Age mammals, which would be a first for our state and of national historical significance.

In addition, our research documents 27 known archaeological sites are within or adjacent to the 200 ft wide buffer we examined for DAPL and an additional 137 known archaeological sites are within 3300 ft of the proposed pipeline. These known resources should be taken into account by the project per the requirements of Section 106 of the National Historic Preservation Act but the vast areas of archaeologically unexplored landscape slated to be affected by construction of DAPL should also be investigated as it is highly likely currently unknown but significant archaeological deposits will be discovered. If this were an Iowa DOT or DNR project, the entire area of potential effect would be included in requirements for archaeological compliance and DAPL should be subject to the same level of scrutiny to which we hold Iowa agencies.

Please include my office as an interested party in consultation about the archaeological compliance for this project including decisions about where archaeological investigations take place, the field methods utilized, the adequacy of the work, and the findings.

Sincerely,

John Doershuk, Ph.D.



State Archaeologist and Director