



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
MICHIGAN STATE HOUSING DEVELOPMENT AUTHORITY
STATE HISTORIC PRESERVATION OFFICE

KEVIN ELSENHEIMER
EXECUTIVE DIRECTOR

October 14, 2016

ELAINE ROBINSON
COMMONWEALTH CULTURAL RESOURCES GROUP INC
2530 SPRONG ARBOR ROAD
JACKSON MI 49203-3602

RE: ER14-458 ET Rover Pipeline Project - 1st Addendum to Phase I Cultural Resource Survey - Lenawee, Washtenaw & Livingston Counties

Dear Ms. Robinson:

We have reviewed the report entitled Addendum to the Phase I Cultural Resources Survey of the Proposed Rover Pipeline Project in Lenawee, Washtenaw, and Livingston Counties, Michigan, prepared by Commonwealth Cultural Resources Group (CCRG). This is the report commonly referred to as the First Addendum report (R-1187). It is our understanding that this report covers only archaeological resources, and any above-ground cultural resources are addressed in the Second Addendum report.

The survey examined and recorded a total of twenty sites, both newly discovered and previously identified. Those sites are: 20LE356, 20LE368, 20LE376, 20LE377, 20LE378, 20LE379, 20LE380, 20LE381, 20LE382, 20LE384, 20LE385, 20WA471, 20WA472, 20WA473, 20WA474, 20LE475, 20WA476, 20LV367, 20LV68, and 20LV369.

Of the twenty sites discussed in the report, CCRG recommended that eighteen of the sites are not eligible for listing on the National Register of Historic Places (NRHP). Those eighteen sites are: 20LE356, 20LE376, 20LE377, 20LE378, 20LE379, 20LE380, 20LE382, 20LE384, 20LE385, 20WA471, 20WA472, 20WA473, 20WA474, 20LE475, 20WA476, 20LV367, 20LV68, and 20LV369. Site 20WA474 is among the sites recommended as not eligible, but the report indicates that due to changes in the project corridor, the site is now outside of the APE.

CCRG recommended that site 20LE381 is eligible for the NRHP. CCRG also recommended that site 20LE368 requires further evaluation to determine its eligibility.

We agree with the recommendation that the eighteen sites listed above are not eligible for the NRHP. We also agree that site 20LE368 may be eligible, but requires further evaluation to make that determination. We do not, however, agree at this point with CCRG's recommendation that site 20LE381 is eligible for listing on the NRHP. The diagnostic Hi-Lo point recovered from the site indicates a Late Paleoindian occupation, and as CCRG points out, it is possible that the site is a single component Late Paleoindian site. Those circumstances establish the possibility that the site may be eligible. However, as it is currently understood, the site is very sparse, represented by 13 artifacts recovered from an area over an acre in size. It is unknown whether there are subsurface deposits and additional artifacts present at the site. While we agree that this could be an important site, and may be eligible, we believe that additional evaluation is needed to determine whether the site meets the eligibility requirements of Criterion D.

In the text discussions of sites 20LE368 (p. 3-13) and 20LE381 (p. 3-15) CCRG indicates that Rover has issued a modified proposed survey corridor and associated work space for the proposed Michigan Market Segment of the pipeline. In both cases, Rover has shifted the locations of the proposed work spaces to avoid those sites. Since the sites will be avoided, further investigation of the sites to determine eligibility will not be necessary at this time. CCRG recommends that exclusion fencing be placed along the edge of the work space adjacent to the north side of site 20LE368, and along the edge of the work space adjacent to the west side of site 20LE381 to prevent any inadvertent disturbance of the sites. We agree with their recommendation, and ask that the fencing be installed prior to any work taking place.

Finally, we noted that the abstract for the report indicates that 3.9 miles of project area intended to be surveyed were



not surveyed due to property owners denying access. Please let us know of any plans for eventually completing survey of that 3.9 mile area.

In summary, it is our opinion that eighteen of the twenty archaeological sites discovered during the survey or previously identified are not eligible for the NRHP. One of those sites – 20WA474 – is also no longer within the project corridor. It is our opinion that sites 20LE368 and 20LE381 may be eligible for the NRHP. It is also our understanding that those sites will be avoided during project construction. Fencing will be placed to ensure that sites 20LE368 and 20LE381 are not inadvertently disturbed.

If you have any questions, please contact Brian Grennell Cultural Resource Management Specialist, at 517-335-2721 or by email at grennellb@michigan.gov. **Please reference our project number in all communication with this office regarding this undertaking.** Thank you for your cooperation.

Sincerely,



Brian G. Grennell
Cultural Resource Management Specialist

for Brian D. Conway
State Historic Preservation Officer

DLA:BGG