



RICK SNYDER
GOVERNOR

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

KEVIN ELSENHEIMER
EXECUTIVE DIRECTOR

October 6, 2015

CHRIS ESPENSHADE
COMMONWEALTH CULTURAL RESOURCES GROUP INC
2530 SPRONG ARBOR ROAD
JACKSON MI 49203-3602

RE: ER14-458 ET Rover Pipeline Project Phase I Cultural Resource Survey - Monroe, Lenawee, Washtenaw, Livingston, Shiawassee, Genesee, Oakland, Lapeer, Macomb, St. Clair Counties

Dear Mt. Espenshade:

We have reviewed the report entitled *Phase I Cultural Resources Survey of the Proposed Rover Pipeline Project in Monroe, Lenawee, Washtenaw, Livingston, Shiawassee, Genesee, Oakland, Lapeer, Macomb, and St. Clair Counties, Michigan* prepared by Commonwealth Cultural Resources Group (CCRG). The report includes information on 127 archaeological sites that were either newly discovered sites or previously recorded sites that were field verified. CCRG recommends that nine sites located within the area of potential effect (APE) need to either be avoided or investigated further if avoidance is not possible. Those sites are: 20LE338, 20LE355, 20LE193, 20LE368, 20WA452, 20WA461, 20WA466, 20GS147 and 20LP357. We agree that these nine sites may be eligible for listing on the National Register of Historic Places (NRHP), and if they cannot be avoided, further investigation needs to be conducted to determine their eligibility.

For above-ground properties within the project area defined in the report, we note that the report only provides descriptive and historical information and photographs for those evaluated in the report as eligible. This procedure is at variance with the procedure followed for archaeological resources, where descriptive information and an analysis of potential significance are presented for all archaeological sites identified through this project. The lack of descriptive and historical information and photographs and the consultant's recommendation and rationale for it for the other surveyed above-ground properties prevents us from making our own reviews. Providing data for only the above-ground resources the consultants viewed as eligible is not acceptable. Sufficient information and photographs of all the newly surveyed above-ground properties for us to form our own conclusions concerning their eligibility must be provided.

A number of the assessments for above-ground farm and farmstead properties list the properties as eligible partly or even exclusively under criterion A under the theme of Agriculture. For each the assessment provides some background on agricultural uses from historical sources of information, but in no case does the assessment refer back to any kind of agricultural context information that would help make a case for how the property meets the criteria under Agriculture. We note the same issue for properties evaluated as significant under Architecture. As is done for archaeological resources, the assessments for above-ground resources need to be based on context, for Architecture based on a look at the area's other architectural resources of similar age, type, and style as best as that can be determined from whatever information is available such as applicable national and state register forms, architectural survey reports and studies, local township or other histories that illustrate historic properties, and, if nothing else is available, by the project team looking around the project area enough to get a sense of the local architectural context. Each assessment should include the rationale for the evaluation made.

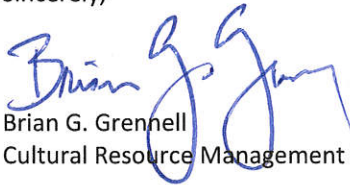
We note also the above-ground inventory entries in Volume 1 do not list the township or municipal units in which the properties are located (the archaeological site records always do contain that information). The local governmental unit is a key part of the basic identification for any property and should always be included. Nor do the aerial view site plans or photographs in Appendix E identify either the county or municipal unit – this makes



finding the illustrations for the inventory records in Volume I a cumbersome task. Ideally the site plans and photos should appear alongside the record, but if that is difficult to accomplish, making sure both the inventory record and illustrations list the town and county and citing the page numbers for the illustrations in the record (Appendix E-20-21, for example), would make the report much easier to use.

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,

A handwritten signature in blue ink, appearing to read "Brian G. Grennell". The signature is stylized and written over the printed name and title.

Brian G. Grennell
Cultural Resource Management Specialist

for Brian D. Conway
State Historic Preservation Officer

SAT:ROC:bgg