



HEADQUARTERS

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June 2, 2020
J-1157/R1443

Carol McCoy
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12075 Corporate Parkway Suite 200
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RE: Railsplitter Solar Desktop Review, Augusta Township, Washtenaw County, Michigan

Ms. McCoy,

Commonwealth Heritage Group, Inc. (Commonwealth) completed a preliminary cultural resources assessment for the proposed Railsplitter Solar project. Located in Sections 29, 30, 31, and 32 of Augusta Township (T4S R7E), Washtenaw County, Michigan (Figure 1), the 700 ha (1,728 ac) Project Area (PA) is based on keyhole markup language zipped (.kmz) files provided to Commonwealth by Stantec on May 13, 2020, and as revised by Stantec on May 14, 2020 removing two parcels in Section 31. This letter report provides the results of the background research as well as an assessment of the potential for the area to contain historic properties eligible for or listed in the National Register of Historic Places (NRHP).

Solar projects are not commonly reviewed by the Michigan State Historic Preservation Office (SHPO) due to the lack of federal involvement. Although no federal nexus is anticipated for this project, Commonwealth reviewed archaeological resources in a study area that includes the PA, in which ground disturbing activity is expected to occur, and extends to include a 1.0-mile radius beyond the PA's boundaries (Archaeology Study Area). Commonwealth established a study area for above-ground resources that includes the PA and extends to include a 0.25-mile radius beyond the PA to allow for consideration of indirect impacts to extant resources (Above-Ground Study Area).

Archaeological Sites and Surveys

Michigan SHPO records (Figure 1; Table 1) show that one archaeological survey was conducted in the PA (Holman and Hambacher 1988: ER81-04) and that two additional surveys were conducted in the Study Area (Stillwell 2015: ER-7.15.150289; Taylor et al. 2002: ER03-18). Not reflected in SHPO records, however, was a 307 acre survey conducted by Atwell, LLC (2015) that occurred in the PA north of Arkona Road in support of the once proposed Motor City Solar 100-Megawatt (MW) photovoltaic solar energy generation facility and associated Gen-Tie electric connection. "Atwell utilized a pedestrian survey methodology with transects spaced 30 meters apart and shovel testing as necessary at the discretion of the Principal Investigator (Atwell, LLC 2015:11)" to investigate 45% of the 680-acre 2015 project area, in places believed to reflect the highest probability of harboring cultural

OTHER LOCATIONS

Alexandria, VA [703] 354-9737 Columbus, OH [614] 549-6190 Littleton, MA [978] 793-2579 Milwaukee, WI [414] 446-4121
Minneapolis, MN [612] 597-1589 Ogden, UT [801] 394-0013 Tarboro, NC [252] 641-1444 Traverse City, MI [517] 262-3376

resources. Atwell, LLC focused their fieldwork within agricultural fields bordering Sugar Creek, Buck Creek, and an unnamed tributary of Buck Creek, as well as in areas within 200 ft of road ways identified on historic maps, and avoided areas previously surveyed by Holman and Hambacher (1988: ER81-04) and Taylor et al. (2002). Atwell, LLC’s prefield research suggested that precontact period cultural resources would most likely be encountered on well drained soils in close proximity to these water sources, though the report is unclear regarding their treatment or investigation of potential resources that might be found on topographic rises or in association with soils indicative of past wetland resources.

Table 1. Previous archaeological surveys conducted within one mile of the PA

Environmental Review (ER) Number	Project	Associated Sites	Associated References	In Project Area
ER-88104	Proposed Hazardous Waste and Landfill Facility in Augusta Township	20WA206 through 20WA211	Holman and Hambacher 1988	Yes
ER00-7.15.150289	An Archaeological Field Reconnaissance of a Proposed Telecom. Facility, Michigan		Stillwell 2015	No
ER03-18	Cultural Resources Survey: Michigan Power Plant Lateral Project	20WA367-369	Taylor et al. 2002	No
	Cultural Resources Pedestrian Reconnaissance Survey for Motor City Solar Facility, Washtenaw County, Michigan	MC-01 through MC-10	Atwell, LLC 2015	Yes

SHPO records further indicate that seven previously identified archaeological sites are located in the PA, and an additional four sites are located in the 1.0-mile Archaeology Study Area (Table 2). SHPO’s site records do not include 10 archaeological sites, MC-01 through MC-10, and 15 isolated finds (Table 3) identified during the Atwell, LLC (2015) survey. The report by Atwell, LLC does not provide location information for the isolated finds.

Nine of the 11 total sites in the Archaeology Study Area on record at SHPO are verified and were identified during previous archaeological surveys. These nine sites have been determined not eligible for NRHP listing by SHPO staff. The two remaining sites, 20WA41 and 20MR330, are unverified precontact period sites of unknown age, cultural affiliation, or site type. 20WA41 was recorded as a result of inclusion in Holmquist’s atlas (Holmquist 1946) and 20MR330 was recorded based on information obtained from a private collector (Shott 1980). Neither of these two sites have been evaluated for NRHP eligibility. Eight of the 11 sites, or 73%, date to the precontact period, the remaining three sites, or 27%, date to the nineteenth and twentieth centuries. A review of Figure 1 shows that four, or 50% of the eight precontact sites are located near waterways (20WA41, 20WA206, 20WA210, and 20WA367) and that four, or 50% are located on topographic rises (20WA7, 20WA8, 20WA9, 20MR330).

Seven of the 10 sites identified during the Atwell, LLC (2015) survey are nineteenth or twentieth century residences, farmsteads or associated debris, one site is a mid-twentieth century railroad bridge, one site consists of mid-twentieth century cement debris, and one site, or 10% of the sites identified, is an artifact scatter believed to reflect use as an open-air precontact period camp. Atwell, LLC recommends all 10 sites not eligible for NRHP listing. Six of the 15 isolated finds identified during the Atwell, LLC (2015) survey date to the postcontact period and nine, or 60% of the finds, consist of flaked stone lithic material. SHPO guidelines deem all precontact lithic material finds to be archaeological sites. Considering the precontact period sites and isolated finds identified by Atwell, LLC as well as the postcontact period sites and isolated finds in aggregate, 15 of 25, or 67% date to the postcontact period and 10, or 33% date to the precontact period. These results differ markedly from the previous surveys in the area which resulted in 73% of sites dating to the precontact period suggesting that precontact period cultural resources may be underrepresented in the Atwell, LLC (2015) study.

Table 2. Previously identified archaeological sites

Site Number	T/R/S Location	Period	Culture	Function	Description/ Comments	SHPO Status	NRHP Eligibility	In Project Area
20MR330	T5S R7E, Sec. 5, S-SE-NE	Prehistoric unknown	Native American	Undetermined	Private collection	Unverified	Unevaluated	No
20WA41	T4S R7E, Sec. 33, NE-NE-NW	Prehistoric unknown	Native American	Undetermined	Historic reference	Unverified	Unevaluated	No
20WA206	T4S R7E, Sec. 32, SW-NE-NE	Late Woodland period	Native American	Undetermined	Lithic scatter	Verified	Not eligible	Yes
20WA207	T4S R7E, Sec. 32, NE-SE-NW	Prehistoric unknown	Native American	Undetermined	Find spot - flake	Verified	Not eligible	Yes
20WA208	T4S R7E, Sec. 32, NW-NW-SE	Prehistoric unknown	Native American	Undetermined	Lithic scatter	Verified	Not eligible	Yes
20WA209	T4S R7E, Sec. 32, NE-NW-SW	Early Archaic period	Native American	Undetermined	Findspot – projectile point	Verified	Not eligible	Yes
20WA210	T4S R7E, Sec. 32, SW-NW-NW-NE	Prehistoric unknown	Native American	Undetermined	Findspot – fire cracked rock	Verified	Not eligible	Yes
20WA211	T4S R7E, Sec. 32, SE-SE-NE	Nineteenth Century	American/ Euro-American	Undetermined	Findspot – kaolin pipe	Verified	Not eligible	Yes

Site Number	T/R/S Location	Period	Culture	Function	Description/ Comments	SHPO Status	NRHP Eligibility	In Project Area
20WA367	T4S R7E, Sec. 19, SW-NW-NW-SW	Prehistoric unknown	Native American	Undetermined	Small lithic scatter	Verified	Not eligible	No
20WA368	T4S R7E, Sec. 30, NW-NW-NW	Late Nineteenth to early Twentieth Century, ca. 1880-1915	American	Undetermined	Surface scatter – domestic refuse	Verified	Not eligible	No
20WA369	T4S R7E, Sec. 32, NW-NE-NW-SE	Twentieth Century, ca. 1930-1967	American	Farmstead	Abandoned farm buildings, collapsed structures, artifact scatter	Verified	Not eligible	Yes
MC-01	T4S R7E, Sec. 30, SE-NW	Late 19th to Early 20th Century	American	Residence	Domestic debris scatter		Not eligible*	No
MC-02	T4S R7E, Sec. 29, NW-SW	Mid-19th Century to Mid-20th Century	American	Midden/refuse pile	Domestic debris scatter		Not eligible*	Yes
MC-03	T4S R7E, Sec. 29, SE-SW	Prehistoric unknown	Native American	Open camp	Artifact scatter		Not eligible*	Yes
MC-04	T4S R7E, Sec. 29, SE-SW	Early to Mid-20th Century	American	Residential/Farm/ Agricultural	Foundations and Artifact Scatter		Not eligible*	Yes
MC-05	T4S R7E, Sec. 29, SW-SW	Early to Mid-20th Century	American	Residential/Farm/ Agricultural	Foundations and Artifact Scatter		Not eligible*	Yes
MC-06	T4S R7E, Sec. 29, NW-SW	Mid-20th Century	American	Unknown	Fragmented Concrete Foundation Scatter		Not eligible*	Yes
MC-07	T4S R7E, Sec. 30, SE-NE	Early to Mid-20th Century	American	Residence/ Agricultural	Demolished structure		Not eligible*	Yes
MC-08	T4S R7E, Sec. 29, SW-NW	Early to Mid-20th Century	American	Residence/ Agricultural	Demolished structure		Not eligible*	Yes
MC-09	T4S R7E, Sec. 30, SW-SE	Early to Mid-20th Century	American	Unknown	Demolished structure		Not eligible*	Yes
MC-10	T4S R7E, Sec. 30, SE-NE	Mid-20th Century	American	Railway	Railroad Bridge over Sugar Creek		Not eligible*	Yes

*MC-01 through MC-10 NRHP listing eligibility as recommended by Atwell, LLC (2015).

Table 3. Isolated finds (Atwell, LLC 2015)

Isolate Number	Description	Period
MC-IO-01	Metal fragment, Plate glass fragment and brick fragments	Postcontact
MC-IO-02	Whiteware and salt glazed crockery fragments and a brick fragment	Postcontact
MC-IO-03	Milk glass fragment and salt glazed crockery fragment	Postcontact
MC-IO-04	Salt glazed crockery fragment and glass fragment	Postcontact
MC-IO-05	Unknown ungulate articulated joint bone	Postcontact
MC-IO-06	Bayport chert Flake	Precontact
MC-IO-07	Scattered <i>Bos torus</i> bones (modern)	Postcontact
MC-IO-08	Possible core	Precontact
MC-IO-09	Bayport Flake	Precontact
MC-IO-10	Three Bayport chert flakes in a 20 meter by 20 meter area	Precontact
MC-IO-11	Bayport chert Flake	Precontact
MC-IO-12	Four flakes in a 20 meter by 20 meter area with 2 material types.	Precontact
MC-IO-13	Seven primary flakes in a 20 by 20 meter area which are all the same Bayport chert material type	Precontact
MC-IO-14	Three Bayport chert flakes in a 20 meter by 20 meter area	Precontact
MC-IO-15	Two Bayport chert flakes in a 10 meter by 10 meter area	Precontact

Above-Ground Resources

Commonwealth conducted a literature review of the PA and surrounding 0.25-mile buffer (the Above-Ground Study Area, Figure 1) to identify previously recorded above-ground resources in the Project vicinity. Review of the NRHP database revealed that there are no NRHP-listed properties in the Above-Ground Study Area (National Park Service 2020). Additionally, according to records in the Michigan SHPO database there are no recorded above ground cultural resources within the Above-Ground Study Area.

Summary

Commonwealth's review of Michigan SHPO archaeological records and other area investigations resulted in the identification of seven previously recorded sites, nine sites that have not been recorded, 15 isolated finds of which at least nine should be recorded, and two previous cultural resource surveys in the PA. These previously identified sites mainly include a mix of prehistoric lithic scatters and remnants of historic residences and farmsteads. Approximately two-thirds of the PA has been previously subjected to formal archaeological investigation; however, these surveys date to 1998, 2002, and 2015 and may reflect outdated information. A comparison of the results between the Atwell, LLC (2015) survey and the Holman and Hambacher (1988) survey suggests that additional precontact cultural resources may be located on topographic rises in the PA distant from waterways in areas that have not been surveyed. Further, the presence of postcontact period resources in other parts of the PA may suggest similar resources in areas of the PA that have not been subject to survey.

Ms. Carol McCoy

June 2, 2020

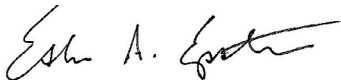
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Therefore, based on the information gathered including the number of archaeological sites previously identified, there is an elevated likelihood of locating additional archaeological sites in the PA. If there were a federal nexus, archaeological survey of the entirety of the proposed PA would be required where ground-disturbing activities are planned. SHPO would likely expect survey of the PA in partial fulfillment of a federal agency's NHPA Section 106 responsibilities. If NRHP-eligible archaeological sites are identified, avoidance and/or mitigation measures could be developed to resolve potential adverse effects.

Based on the desktop review, there has been no recorded survey designed to identify above-ground resources in the PA. Although not required, Commonwealth similarly recommends an above-ground survey of the PA that takes into consideration the viewshed of the proposed solar farm. In a setting with open views and flat expanses, this could include up to a half-mile buffer around the PA. A reconnaissance-level field survey of these resources by qualified architectural historians would establish a historic context for the PA, by which resources could be evaluated. If historic properties are identified, avoidance and/or mitigation measures could be developed to resolve potential adverse effects.

Commonwealth is pleased to have been able to assist with your cultural resource review for the proposed Railsplitter Solar Project in Washtenaw County, Michigan. Please do not hesitate to contact either of us or the Michigan Regional Director, Brandon Gabler (571-488-5912; bgabler@chg-inc.com) if you have any additional questions or concerns related to this letter or require assistance with future cultural resources projects.

Sincerely,



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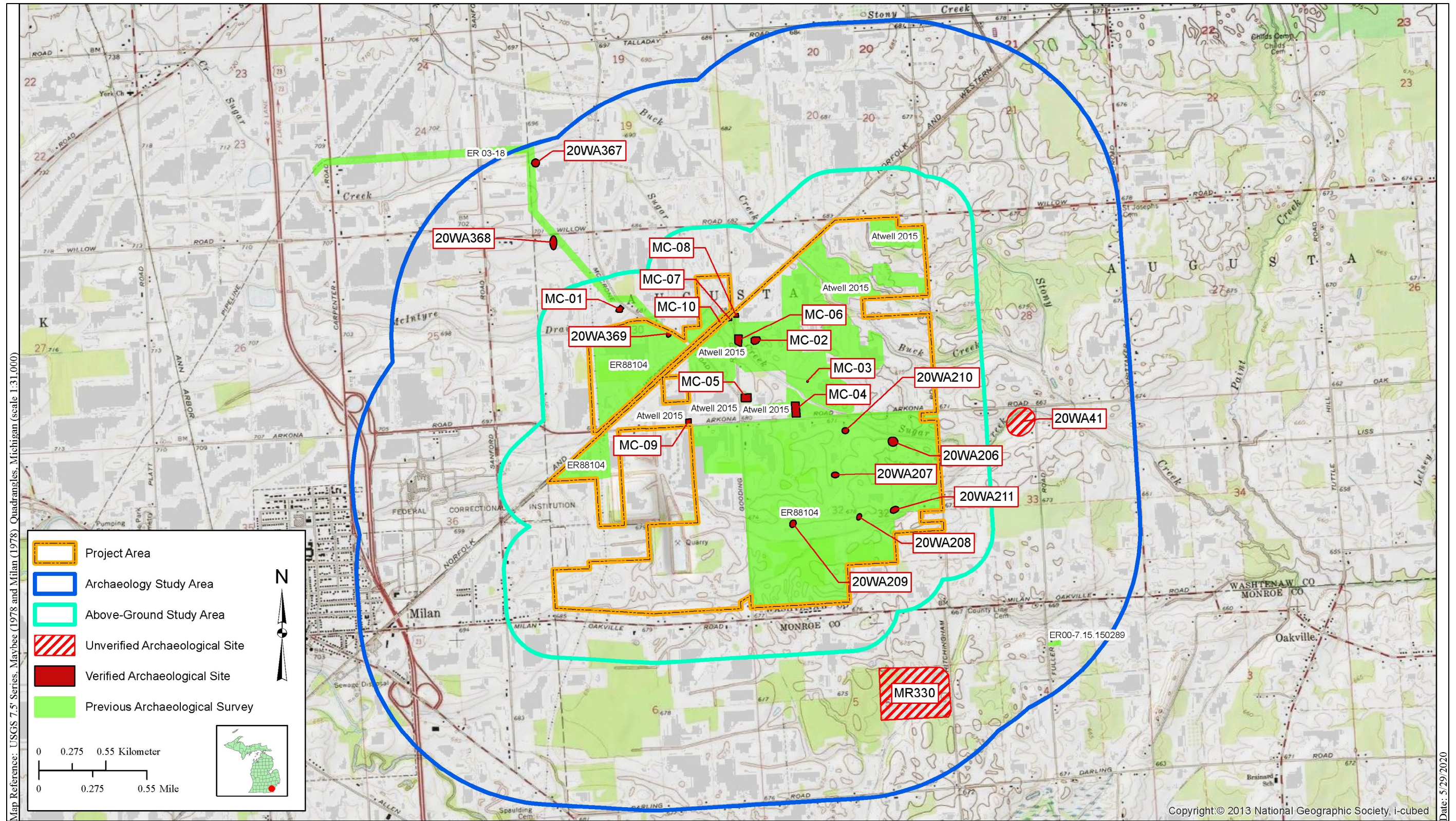


Figure 1. Project Area, Archaeology Study Area, archaeological sites and surveys in the Archaeology Study Area, and Above-Ground Study Area