

16. 4th Ave N and N 20th St, looking north



Image capture: Oct 2008 © 2020 Google

17. Ludington St and N 6th St, looking south



Image capture: Oct 2008 © 2020 Google

18. N 10th St and Ludington St, looking south



Image capture: Oct 2008 © 2020 Google

19. N 14th St and Ludington St, looking south



Image capture: Oct 2008 © 2020 Google

20. Stephenson Ave and 2nd Ave N, looking west



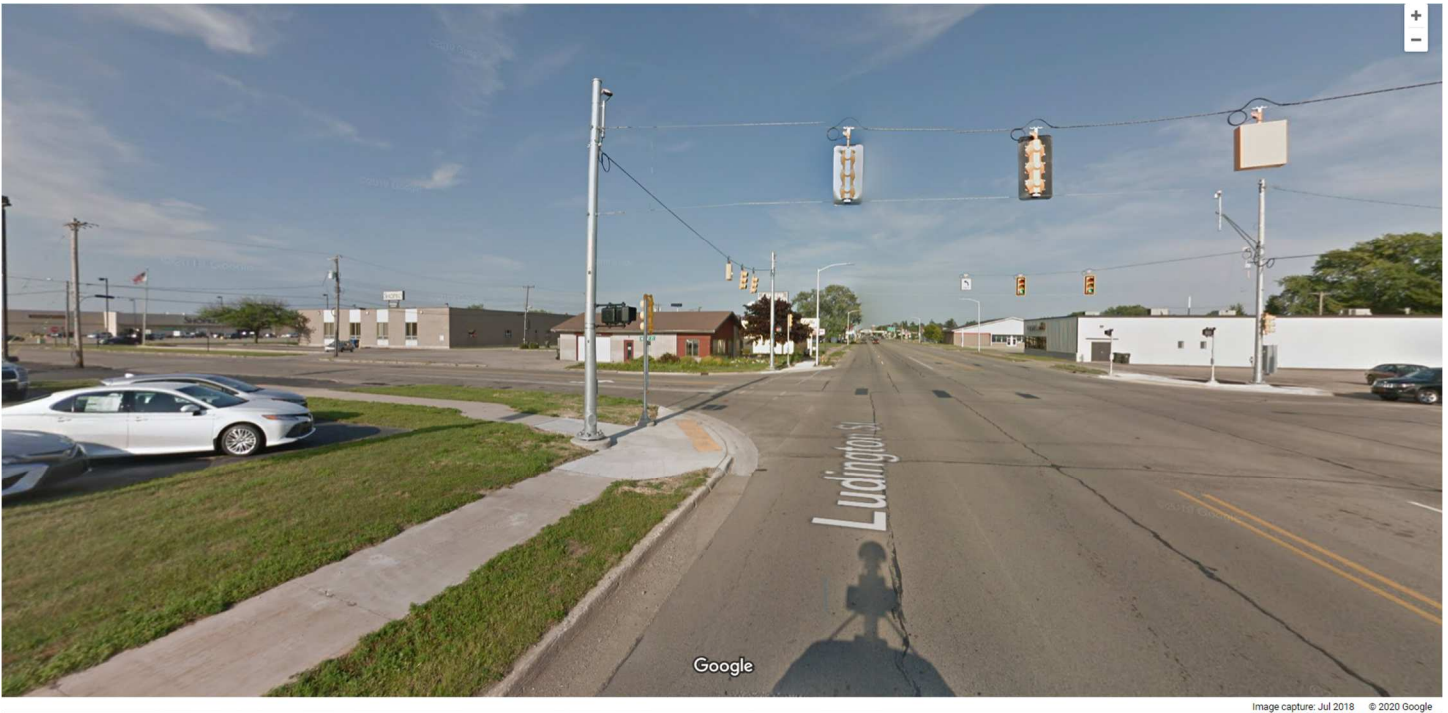
Image capture: Jul 2018 © 2020 Google

21. S Lincoln Rd and Ludington St, looking south



Image capture: Jul 2018 © 2020 Google

22. N 26th St and Ludington St, looking east



23. Ludington St and N 19th St, looking east



24. 1st Ave S and N 15th St, looking east



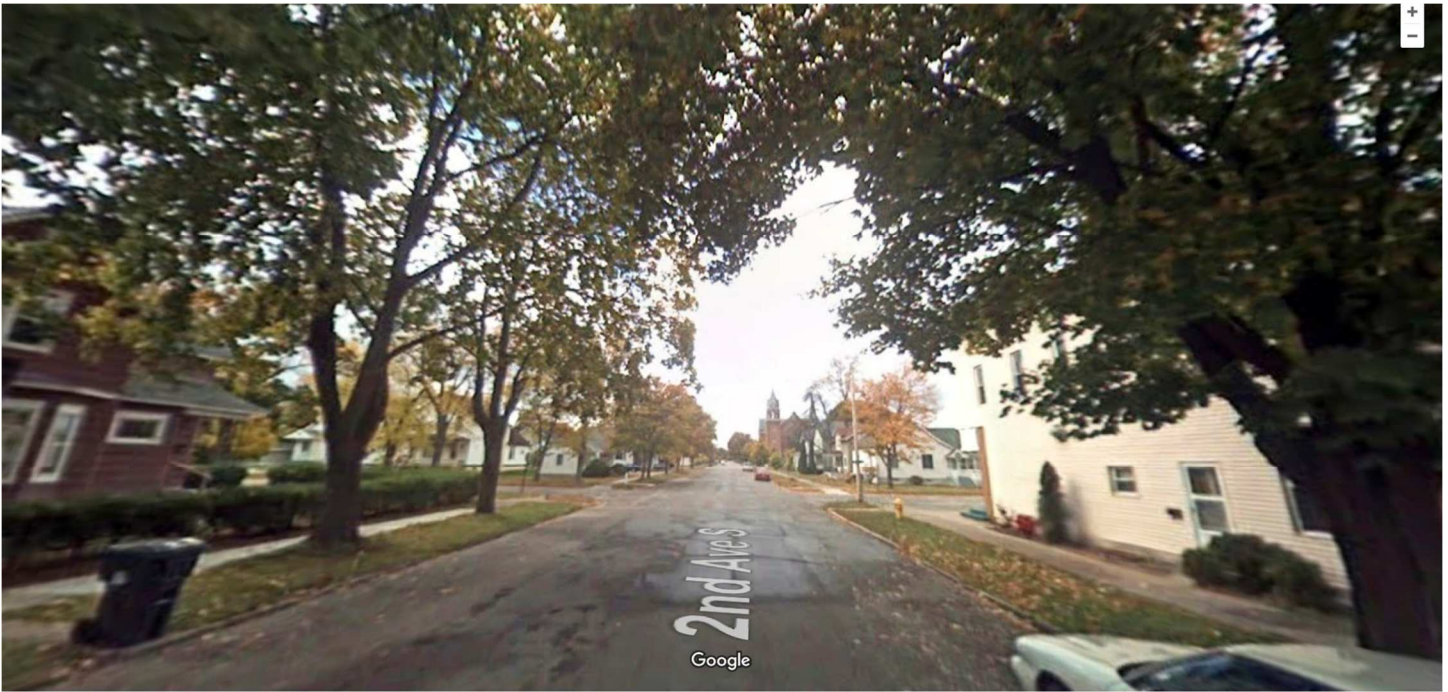
Image capture: Oct 2008 © 2020 Google

25. Ludington St and N 12th St, looking east



Image capture: Jul 2018 © 2020 Google

26. 2nd Ave S and S 11th St, looking west



27. S 8th St and Ludington St, looking north



28. 2nd Ave S and S 5th St, looking east



Image capture: Oct 2008 © 2020 Google

29. Lake Shore Dr and 1st Ave S, looking west



Image capture: Oct 2008 © 2020 Google

30. S 3rd St and Ogden Ave S, looking north



Image capture: Oct 2008 © 2020 Google

31. S 5th St and Ogden Ave S, looking north



Image capture: Oct 2008 © 2020 Google

32. Ogden Ave S and S 7th St, looking north



Image capture: Oct 2008 © 2020 Google

33. Lake Shore Dr and S Bay St, looking south



Image capture: Oct 2008 © 2020 Google

34. S 10th St and 5th Ave S, looking west



35. S 12th St and 4th Ave S, looking south



36. S 14th St and 3rd Ave S, looking east



Image capture: Oct 2008 © 2020 Google

37. S 17th St and 2nd Ave S, looking north



Image capture: Oct 2008 © 2020 Google

38. Willow Creek Rd and 8th Ave S, looking south



Image capture: Oct 2008 © 2020 Google

39. S 30th St and 5th Ave S, looking north



Image capture: Oct 2008 © 2020 Google

40. 5th Ave S and S Lincoln Rd, looking west



Image capture: Oct 2008 © 2020 Google

41. 8th Ave S and S 20th St, looking west



Image capture: Oct 2008 © 2020 Google

42. 5th Ave S and S 16th St, looking west



Image capture: Oct 2008 © 2020 Google

43. S 17th St and 8th Ave S, looking east



Image capture: Oct 2008 © 2020 Google

44. 6th Ave S and S 14th St, looking west



Image capture: Oct 2008 © 2020 Google

45. 7th Ave S and S 11th St, looking north



Image capture: Oct 2008 © 2020 Google

46. Lake Shore Dr and 10th Ave S, looking west



Image capture: Oct 2008 © 2020 Google

47. S 13th St 10th Ave S, looking south



Image capture: Oct 2008 © 2020 Google

48. S 15th St and 10th Ave S, looking north



Image capture: Oct 2008 © 2020 Google

49. Lake Shore Dr and 13th Ave S, looking north



Image capture: Oct 2008 © 2020 Google

50. S 15th St and 16th Ave S, looking north



Image capture: Oct 2008 © 2020 Google

51. Lake Shore Dr and 18th Ave S, looking north



Image capture: Oct 2008 © 2020 Google

52. Lake Shore Dr and 22nd Ave S, looking south



Image capture: Oct 2008 © 2020 Google

53. S 21st St and 25th Ave S, looking south



Image capture: Oct 2008 © 2020 Google

54. 18th Ave S and S 21st St, looking east



Image capture: Oct 2008 © 2020 Google

55. S Lincoln Ave and 14th Ave S, looking north



Image capture: Jul 2018 © 2020 Google

56. 23rd Ave S and S 22nd St, looking east



57. S Lincoln Rd and Lake Shore Dr, looking south



58. M35 and Airport Dr, looking south



59. 14th Ave S and S 30th St, looking north



60. Willow Creek Rd looking north



Hendricks, Ashley

From: Grennell, Brian (LEO) <GrennellB@michigan.gov>
Sent: Monday, April 20, 2020 11:33 AM
To: Hendricks, Ashley
Cc: Cain, David; Pionk, Darren; MSF-SHPOResearch
Subject: RE: Escanaba DWRF SHPO Status (200023)

It appears that we received it on 4/6 (ER20-619). We will try to complete a review within the 30 day response period, but under the current circumstances, I can't guarantee it.

Brian G. Grennell
Cultural Resource Management Coordinator
State Historic Preservation Office
Michigan Economic Development Corporation
300 N. Washington Square | Lansing, MI 48913
Direct Phone (517) 335-2721

Grennellb@michigan.gov www.michigan.gov/shpo

In accordance with Gov. Gretchen Whitmer and the Michigan Department of Health and Human Services' [recommendations designed to help prevent the spread of Coronavirus Disease 2019 \(COVID-19\)](#), the Michigan Economic Development Corporation and the State Historic Preservation Office will be closed for research appointments beginning March 17th.

The state is taking proactive steps to mitigate the spread of COVID-19 in Michigan, and we are approaching all of our operations with public health and safety as our top priority. We apologize for any inconvenience and will reach out with additional communications as we learn more. We appreciate your understanding and cooperation in reducing the coronavirus risk to Michigan residents.

For current and up-to-date information regarding the Coronavirus visit <http://www.Michigan.gov/Coronavirus> or <http://www.CDC.gov/Coronavirus>.

SHPO Staff will work to complete research requests via email but please understand that some files are not digitally accessible and in some cases it will be necessary to wait for the office to reopen to complete your research. Staff will continue to keep this email updated. We appreciate your patience.

From: MSF-SHPOResearch <MSF-SHPOResearch@michigan.gov>
Sent: Monday, April 20, 2020 10:29 AM
To: Grennell, Brian (LEO) <GrennellB@michigan.gov>
Subject: FW: Escanaba DWRF SHPO Status (200023)

Katie Kolokithas
Survey Coordinator
State Historic Preservation Office
Michigan Economic Development Corporation
300 N. Washington Square | Lansing, MI 48913
Office: 517.335.9840 | Desk: 517.241.6062

This message contains information which may be confidential and privileged. Unless you are the intended recipient (or authorized to receive this message for the intended recipient), you may not use, copy, disseminate or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by reply e-mail, and delete the message. Thank you very much

From: Hendricks, Ashley <ashley.hendricks@C2AE.COM>
Sent: Monday, April 20, 2020 10:24 AM
To: MSF-SHPOResearch <MSF-SHPOResearch@michigan.gov>
Cc: Cain, David <david.cain@C2AE.COM>; Pionk, Darren <darren.pionk@c2ae.com>
Subject: Escanaba DWRF SHPO Status (200023)

Good Morning,

I received initial correspondence for the City of Escanaba's DWRF Project on March 6, 2020 from Stacy Tchorzynski at SHPO with the sites near the TRS; upon reviewing these sites it was found that none of them were within the project area. On March 26th, I submitted a SHPO Section 106 Application for this project via hardcopy in the mail. From what I understand, you guys are unable to meet the 30-day turn around with the Stay Home order. However, I wanted to confirm you guys have received this application and also wanted to check on when it is expected that this application will be reviewed.

Thank you,

Ashley Hendricks, EIT
Civil Engineer

C2AE
architecture | engineering
1211 Ludington Street
Escanaba, MI 49829
O: 906.217.1014
M: 920.562.9158

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In response to COVID-19, C2AE's staff is continuing to provide fully integrated services from the safety of our homes using a robust telecommunication system and following our clients' established protocols. We remain committed to serving our clients and working with our contracting and vendor partners. We wish you good health in this period of uncertainty.

2. Archaeological and Historical Resources

An application was submitted to SHPO on March 26th and received by SHPO on April 6, 2020 (refer to correspondence on previous two pages). Under the circumstances of the Stay at Home Order and the Covid-19 virus, the response from SHPO may be delayed. Responses will be included when they are received.

MICHIGAN ECONOMIC
DEVELOPMENT CORPORATION

May 11, 2020

SONYA T BUTLER
MICHIGAN DEPARTMENT OF ENVIRONMENT GREAT LAKES AND ENERGY
P O BOX 30817
LANSING MI 48909

RE: ER20-619 City of Escanaba Water Distribution System Improvements, T38N, R22W, T38N,
R23W, T39N, R22W, T39N, R23W, City of Escanaba, Delta County (EPA)

Dear Ms. Butler:

Under the authority of Section 106 of the National Historic Preservation Act of 1966, as amended, we have reviewed the above-referenced undertaking. Based on the information provided for our review, it is the opinion of the State Historic Preservation Officer (SHPO) that the proposed undertaking will have **no adverse effect** [36 CFR § 800.5(b)] on historic properties within the area of potential effects for the above-cited undertaking **provided the following condition is met:**

- If landscape changes or tree removals are to occur as part of this project, information (plans, maps, photos, addresses, historical information, etc.) regarding locations where mature trees (larger than 6 inches in diameter) will be removed or other landscape changes may occur will be submitted to the SHPO for review, comment and meaningful consultation.

If you concur, the accompanying form must be signed by an agency official with legal authority to act on behalf of the agency [36 CFR § 800.2(a)]. Please return the signed original to us. Please note that the Section 106 review process will not be complete and the EPA's responsibility to comply with 36 CFR § 800.4, "Identification of historic properties," and 36 CFR § 800.5, "Assessment of adverse effects," will not be fulfilled until we have received this letter with the original signature of the agency official. **If the agency official disagrees with this condition, then consultation with this office shall be reopened per 36 CFR § 800.5(a).**

We remind you that federal agency officials or their delegated authorities are required to involve the public in a manner that reflects the nature and complexity of the undertaking and its effects on historic properties per 36 CFR § 800.2(d). The National Historic Preservation Act also requires that federal agencies consult with any Indian tribe and/or Tribal Historic Preservation Officer (THPO) that attach religious and cultural significance to historic properties that may be affected by the agency's undertakings per 36 CFR § 800.2(c)(2)(ii).

The State Historic Preservation Office is not the office of record for this undertaking. You are therefore asked to maintain a copy of this letter with your environmental review record for this undertaking. **If the scope of work changes in any way, or if artifacts or bones are discovered, please notify this office immediately.**

STATE HISTORIC PRESERVATION OFFICE

If you have any questions, please contact Brian G. Grennell, Cultural Resource Management Coordinator, 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 this opportunity to review and comment, and for your cooperation.

Sincerely,

A handwritten signature in blue ink that reads "Martha MacFarlane Faes". The signature is written in a cursive style with a long, sweeping underline.

Martha MacFarlane Faes
Deputy State Historic Preservation Officer

MMF:SAT:BGG

Enclosure(s)

copy: Jeff Lampi, City of Escanaba
Ashley Hendricks, C2AE



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
MICHIGAN STRATEGIC FUND
STATE HISTORIC PRESERVATION OFFICE

MARK A. BURTON
PRESIDENT

May 11, 2020

~~SONYA T BUTLER~~ City of Escanaba, MI
~~MICHIGAN DEPARTMENT OF ENVIRONMENT GREAT LAKES AND ENERGY~~
~~P O BOX 20817~~
~~LANSING MI 48909~~

RE: ACCEPTANCE LETTER

ER20-619 City of Escanaba Water Distribution System Improvements, T38N, R22W, T38N,
R23W, T39N, R22W, T39N, R23W, City of Escanaba, Delta County (EPA)

We have received comments from the State Historic Preservation Office (SHPO) regarding the above-cited undertaking at the location noted above. We intend to follow the conditions as specified by the SHPO.

I concur: X Patrick S Jordan Date: X 6-12-2020

Printed name and title of agency official: X Patrick S Jordan



Appendix C

Part 3: Tribal Historic Preservation Officers



1211 Ludington St.
Escanaba, MI 49829
O: 906.233.9360
www.c2ae.com

March 20, 2020

Melissa Wiatrolik, THPO
Little Traverse Bay Bands of Odawa Indians
7500 Odawa Cir.
Harbor Springs, MI 49740

**Re: City of Escanaba, Michigan
Delta County
Water Distribution System Improvements
To Evaluate Needs and Recommend Alternatives for Improvements
Environmental Review and Evaluation**

Dear Ms. Wiatrolik,

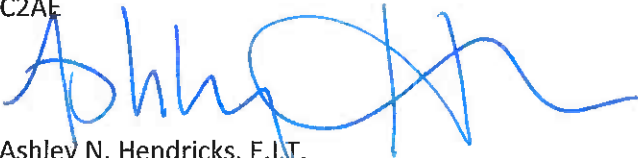
On behalf of the City of Escanaba, Delta County, we are requesting review and comment of plans for improvements to their existing water distribution system.

The City of Escanaba is preparing an EGLE DWRP Program Project Plan to evaluate needs and recommended alternatives for improvements to the water distribution system. The project location spans across the following townships, ranges, and sections: 38N'22W 06, 38N 23W 01, 38N 23W 02, 39N 22W 07, 39N 22W 18, 39N 22W 19, 39N 22W 29, 39N 22W 30, 39N 22W 31, 39N 22W 32, 39N 23W 12, 39N 23W 13, 39N 23W 14, 39N 23W 24, 39N 23W 25, and 39N 23W 36.

We have enclosed a Project Summary and Location Maps. We are requesting your review and comment. Comments received within 30 days will allow them to be incorporated into the project plan prior to the preparation of the final DWRP Project Plan.

Comments can be mailed to our Escanaba office or emailed to ashley.hendricks@c2ae.com.

Sincerely,
C2AE



Ashley N. Hendricks, E.I.T.

Enclosure
cc: 20-0023 File B-10



1211 Ludington St.
Escanaba, MI 49829
O: 906.233.9360
www.c2ae.com

March 20, 2020

Daisy McGeshick, THPO
P.O. Box 249
Watersmeet, MI 49969

**Re: City of Escanaba, Michigan
Delta County
Water Distribution System Improvements
To Evaluate Needs and Recommend Alternatives for Improvements
Environmental Review and Evaluation**

Dear Ms. McGeshick,

On behalf of the City of Escanaba, Delta County, we are requesting review and comment of plans for improvements to their existing water distribution system.

The City of Escanaba is preparing an EGLE DWRP Program Project Plan to evaluate needs and recommended alternatives for improvements to the water distribution system. The project location spans across the following townships, ranges, and sections: 38N 22W 06, 38N 23W 01, 38N 23W 02, 39N 22W 07, 39N 22W 18, 39N 22W 19, 39N 22W 29, 39N 22W 30, 39N 22W 31, 39N 22W 32, 39N 23W 12, 39N 23W 13, 39N 23W 14, 39N 23W 24, 39N 23W 25, and 39N 23W 36.

We have enclosed a Project Summary and Location Maps. We are requesting your review and comment. Comments received within 30 days will allow them to be incorporated into the project plan prior to the preparation of the final DWRP Project Plan.

Comments can be mailed to our Escanaba office or emailed to ashley.hendricks@c2ae.com.

Sincerely,
C2AE

A handwritten signature in blue ink, appearing to read 'Ashley N. Hendricks', is written over the typed name below.

Ashley N. Hendricks, E.I.T.

Enclosure
cc: 20-0023 File B-10



1211 Ludington St.
Escanaba, MI 49829
O: 906.233.9360
www.c2ae.com

March 20, 2020

Earl Meshigaud, Hannahville Indian Community
N-14911 Hannahville B1 Rd.
Wilson, MI 49896

**Re: City of Escanaba, Michigan
Delta County
Water Distribution System Improvements
To Evaluate Needs and Recommend Alternatives for Improvements
Environmental Review and Evaluation**

Dear Mr. Meshigaud,

On behalf of the City of Escanaba, Delta County, we are requesting review and comment of plans for improvements to their existing water distribution system.

The City of Escanaba is preparing an EGLE DWRP Program Project Plan to evaluate needs and recommended alternatives for improvements to the water distribution system. The project location spans across the following townships, ranges, and sections: 38N 22W 06, 38N 23W 01, 38N 23W 02, 39N 22W 07, 39N 22W 18, 39N 22W 19, 39N 22W 29, 39N 22W 30, 39N 22W 31, 39N 22W 32, 39N 23W 12, 39N 23W 13, 39N 23W 14, 39N 23W 24, 39N 23W 25, and 39N 23W 36.

We have enclosed a Project Summary and Location Maps. We are requesting your review and comment. Comments received within 30 days will allow them to be incorporated into the project plan prior to the preparation of the final DWRP Project Plan.

Comments can be mailed to our Escanaba office or emailed to ashley.hendricks@c2ae.com.

Sincerely,
C2AE



Ashley M. Hendricks, E.I.T.

Enclosure
cc: 20-0023 File B-10



1211 Ludington St.
Escanaba, MI 49829
O: 906.233.9360
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March 20, 2020

Bay Mills Indian Community
Paula Carrick, THPO
12140 W. Lakeshore Drive
Brimley, MI 49715

**Re: City of Escanaba, Michigan
Delta County
Water Distribution System Improvements
To Evaluate Needs and Recommend Alternatives for Improvements
Environmental Review and Evaluation**

Dear Ms. Carrick,

On behalf of the City of Escanaba, Delta County, we are requesting review and comment of plans for improvements to their existing water distribution system.

The City of Escanaba is preparing an EGLE DWRP Program Project Plan to evaluate needs and recommended alternatives for improvements to the water distribution system. The project location spans across the following townships, ranges, and sections: 38N 22W 06, 38N 23W 01, 38N 23W 02, 39N 22W 07, 39N 22W 18, 39N 22W 19, 39N 22W 29, 39N 22W 30, 39N 22W 31, 39N 22W 32, 39N 23W 12, 39N 23W 13, 39N 23W 14, 39N 23W 24, 39N 23W 25, and 39N 23W 36.

We have enclosed a Project Summary and Location Maps. We are requesting your review and comment. Comments received within 30 days will allow them to be incorporated into the project plan prior to the preparation of the final DWRP Project Plan.

Comments can be mailed to our Escanaba office or emailed to ashley.hendricks@c2ae.com.

Sincerely,
C2AE

A handwritten signature in blue ink, appearing to read 'Ashley N. Hendricks', written over the printed name below.

Ashley N. Hendricks, E.I.T.

Enclosure
cc: 20-0023 File B-10



1211 Ludington St.
Escanaba, MI 49829
O: 906.233.9360
www.c2ae.com

March 20, 2020

Colleen Medicine, Cultural Repatriation Specialist
523 Ashmun St.
Sault Ste Marie, MI 49783

**Re: City of Escanaba, Michigan
Delta County
Water Distribution System Improvements
To Evaluate Needs and Recommend Alternatives for Improvements
Environmental Review and Evaluation**

Dear Ms. Medicine,

On behalf of the City of Escanaba, Delta County, we are requesting review and comment of plans for improvements to their existing water distribution system.

The City of Escanaba is preparing an EGLE DWRF Program Project Plan to evaluate needs and recommended alternatives for improvements to the water distribution system. The project location spans across the following townships, ranges, and sections: 38N 22W 06, 38N 23W 01, 38N 23W 02, 39N 22W 07, 39N 22W 18, 39N 22W 19, 39N 22W 29, 39N 22W 30, 39N 22W 31, 39N 22W 32, 39N 23W 12, 39N 23W 13, 39N 23W 14, 39N 23W 24, 39N 23W 25, and 39N 23W 36.

We have enclosed a Project Summary and Location Maps. We are requesting your review and comment. Comments received within 30 days will allow them to be incorporated into the project plan prior to the preparation of the final DWRF Project Plan.

Comments can be mailed to our Escanaba office or emailed to ashley.hendricks@c2ae.com.

Sincerely,
C2AE

Ashley N. Hendricks, E.I.T.

A handwritten signature in blue ink, appearing to read 'Ashley N. Hendricks', with a stylized flourish at the end.

Enclosure
cc: 20-0023 File B-10

Appendix C

Part 4: Facility Discharge Permits
SEE APPENDIX B



1211 Ludington St.
Escanaba, MI 49829
O: 906.233.9360
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4. Facility Discharge Permit

The proposed project does not require a NPDES Permit.

Appendix C

Part 5: Farmland and Open Space Preservation



1211 Ludington St.
Escanaba, MI 49829
O: 906.233.9360
www.c2ae.com

March 20, 2020

MI Department of Agriculture & Rural Development
Farmland Preservation Program
Environmental Stewardship Division
PO BOX 30499
Lansing, MI 48909

**Re: City of Escanaba, Michigan
Delta County
Water Distribution System Improvements
To Evaluate Needs and Recommend Alternatives for Improvements
Environmental Review and Evaluation**

Dear Mr. or Ms.,


On behalf of the City of Escanaba, Delta County, we are requesting review and comment of plans for improvements to their existing water distribution system.

The City of Escanaba is preparing an EGLE DWRP Program Project Plan to evaluate needs and recommended alternatives for improvements to the water distribution system. The project location spans across the following townships, ranges, and sections: 38N 22W 06, 38N 23W 01, 38N 23W 02, 39N 22W 07, 39N 22W 18, 39N 22W 19, 39N 22W 29, 39N 22W 30, 39N 22W 31, 39N 22W 32, 39N 23W 12, 39N 23W 13, 39N 23W 14, 39N 23W 24, 39N 23W 25, and 39N 23W 36.

We have enclosed a Project Summary and Location Maps. We are requesting your review and comment. Comments received within 30 days will allow them to be incorporated into the project plan prior to the preparation of the final DWRP Project Plan.

Comments can be mailed to our Escanaba office or emailed to ashley.hendricks@c2ae.com.

Sincerely,
C2AE



Ashley N. Hendricks, E.I.T.

Enclosure
cc: 20-0023 File B-10



1211 Ludington St.
Escanaba, MI 49829
O: 906.233.9360
www.c2ae.com

March 20, 2020

Farmland Preservation Program
USDA Natural Resources Conservation Service
3001 Coolidge Road, Suite 250
East Lansing, MI 48823-6362

**Re: City of Escanaba, Michigan
Delta County
Water Distribution System Improvements
To Evaluate Needs and Recommend Alternatives for Improvements
Environmental Review and Evaluation**

Dear Mr. or Ms.,

On behalf of the City of Escanaba, Delta County, we are requesting review and comment of plans for improvements to their existing water distribution system.

The City of Escanaba is preparing an EGLE DWRP Program Project Plan to evaluate needs and recommended alternatives for improvements to the water distribution system. The project location spans across the following townships, ranges, and sections: 38N 22W 06, 38N 23W 01, 38N 23W 02, 39N 22W 07, 39N 22W 18, 39N 22W 19, 39N 22W 29, 39N 22W 30, 39N 22W 31, 39N 22W 32, 39N 23W 12, 39N 23W 13, 39N 23W 14, 39N 23W 24, 39N 23W 25, and 39N 23W 36.

We have enclosed a Project Summary and Location Maps. We are requesting your review and comment. Comments received within 30 days will allow them to be incorporated into the project plan prior to the preparation of the final DWRP Project Plan.

Comments can be mailed to our Escanaba office or emailed to ashley.hendricks@c2ae.com.

Sincerely,

C2AE

A handwritten signature in blue ink, appearing to read 'Ashley N. Hendricks', written over the printed name below.

Ashley N. Hendricks, E.I.T.

Enclosure

cc: 20-0023 File B-10

Hendricks, Ashley

From: Hendricks, Ashley
Sent: Tuesday, March 24, 2020 11:08 AM
To: 'Rosek, Martin - NRCS, East Lansing, MI'
Cc: Skinner, Lorrie (CTR) - NRCS, East Lansing, MI; Pionk, Darren; Cain, David
Subject: RE: Escanaba Water Distribution Improvements
Attachments: 200023_200324_EscanabaDWRf_WaterServiceReplacementLocs.pdf

Hi Marty,

We will be replacing existing water service lines (previously disturbed areas) that are outside the right-of-way. There are about 4,000 services scattered throughout the City of Escanaba that need to be replaced. If the service cannot be replaced by directionally drilling, we would have to open trench (width of 10 feet). If we assume an average service length of 30 feet for about 4,000 services, this would come out to 28 acres total. None of these services are on farmland. I think the map with all the service replacement locations was with the letter I sent, but I have attached it to this email for reference. Please let us know if you have any further questions.

Thank you,

Ashley Hendricks, EIT
Civil Engineer

C2AE
architecture | engineering
1211 Ludington Street
Escanaba, MI 49829
O: 906.217.1014

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From: Rosek, Martin - NRCS, East Lansing, MI [mailto:martin.rosek@usda.gov]
Sent: Tuesday, March 24, 2020 10:34 AM
To: Hendricks, Ashley <ashley.hendricks@C2AE.COM>
Cc: Skinner, Lorrie (CTR) - NRCS, East Lansing, MI <lorrie.skinner@usda.gov>
Subject: Escanaba Water Distribution Improvements

Ashley,

I just received the Escanaba Water Distribution Improvements Plan. In order to complete my review of this proposed project, I need to know if any of the improvements are outside the existing road right-of-way. If so, which ones, and where are they located, and how many acres are involved.

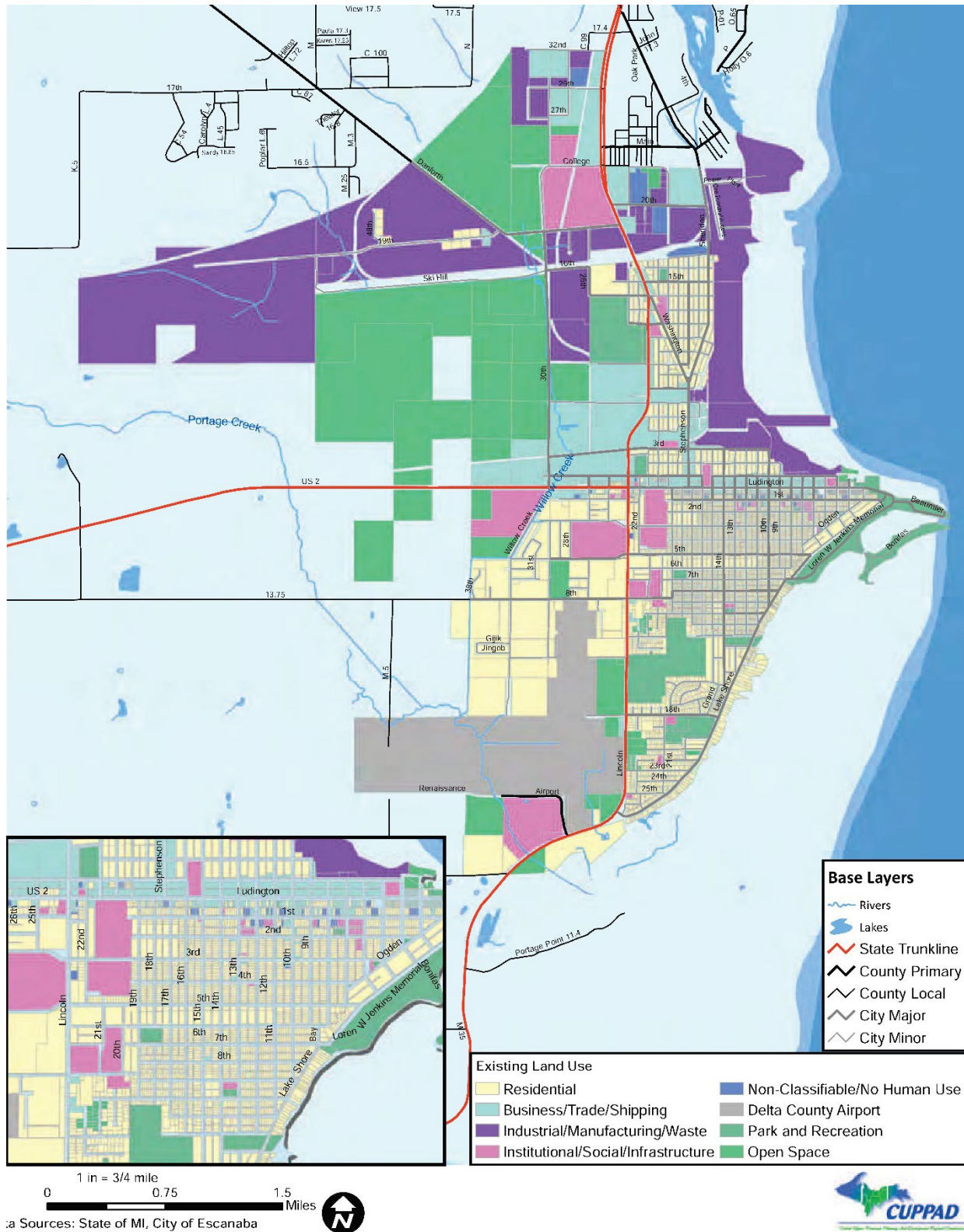
Thank you for this opportunity to review this project.

Marty

Martin J. Rosek, Ph.D.
State Soil Scientist
3001 Coolidge Road

5. Farmland and Open Space Preservation

A map of the Land Uses in the City of Escanaba from the 2016 Master Plan is on the following page. It is not anticipated that the proposed project would involve converting farmlands to nonagricultural uses. Construction will be replacing water main or services in previously disturbed areas.



Map 22: City of Escanaba, Existing Land Uses

Appendix C

Part 6: Local Health Department



1211 Ludington St.
Escanaba, MI 49829
O: 906.233.9360
www.c2ae.com

6. Health Department Permits

The proposed project does not involve the construction, alteration, extension, or replacement of onsite septic systems. Thus the local health department was not contacted.

Appendix C

Part 7: Lagoon Berm Permits
NOT APPLICABLE



1211 Ludington St.
Escanaba, MI 49829
O: 906.233.9360
www.c2ae.com

7. Lagoon Berm Permits

The proposed project will not impact a lagoon as defined where the berm encloses more than five acres. Thus the DEQ WRD Damstaff was not contacted.

Appendix C

Part 8: National Natural Landmarks

8. National Natural Landmarks

A list of national natural landmarks was reviewed, the following three designated National Natural Landmarks in the Upper Peninsula of Michigan were found:

1. Dukes Research Natural Area (Marquette County): 231 acres in the U.S. Forest Service Upper Peninsula Experimental Station, 22 miles southeast of Marquette near Maple Grove.
2. Porcupine Mountains (Gogebic and Ontonagon Counties): 47,761 acres on the southern shore of Lake Superior, 14 miles north of Wakefield.
3. Strangmoor Bog (Schoolcraft County): 9,700 acres within the Seney National Wildlife Refuge, 14 miles southwest of Seney.

None of which are near the vicinity of the project location.

Appendix C

Part 9: Project Site Contamination



1211 Ludington St.
Escanaba, MI 49829
O: 906.233.9360
www.c2ae.com

March 30, 2020

Tom Flaminio
Brownfield Redevelopment, Marquette District Office
Michigan Department of Environment, Great Lakes, and Energy (EGLE)
1504 West Washington Street
Marquette, MI 49855

**Re: City of Escanaba, Michigan
Delta County
Water Distribution System Improvements
To Evaluate Needs and Recommend Alternatives for Improvements
Environmental Review and Evaluation**

Dear Mr. Flaminio,

On behalf of the City of Escanaba, Delta County, we are requesting review and comment of plans for improvements to their existing water distribution system.

The City of Escanaba is preparing an EGLE DWRP Program Project Plan to evaluate needs and recommended alternatives for improvements to the water distribution system. The project location spans across the following townships, ranges, and sections: 38N 22W 06, 38N 23W 01, 38N 23W 02, 39N 22W 07, 39N 22W 18, 39N 22W 19, 39N 22W 29, 39N 22W 30, 39N 22W 31, 39N 22W 32, 39N 23W 12, 39N 23W 13, 39N 23W 14, 39N 23W 24, 39N 23W 25, and 39N 23W 36.

We have enclosed a Project Summary and Location Maps. We are requesting your review and comment. Comments received within 30 days will allow them to be incorporated into the project plan prior to the preparation of the final DWRP Project Plan.

Comments can be mailed to our Escanaba office or emailed to ashley.hendricks@c2ae.com.

Sincerely,
C2AE

Ashley N. Hendricks, E.I.T.

Enclosure
cc: 20-0023 File B-10

9. Project Site Contamination

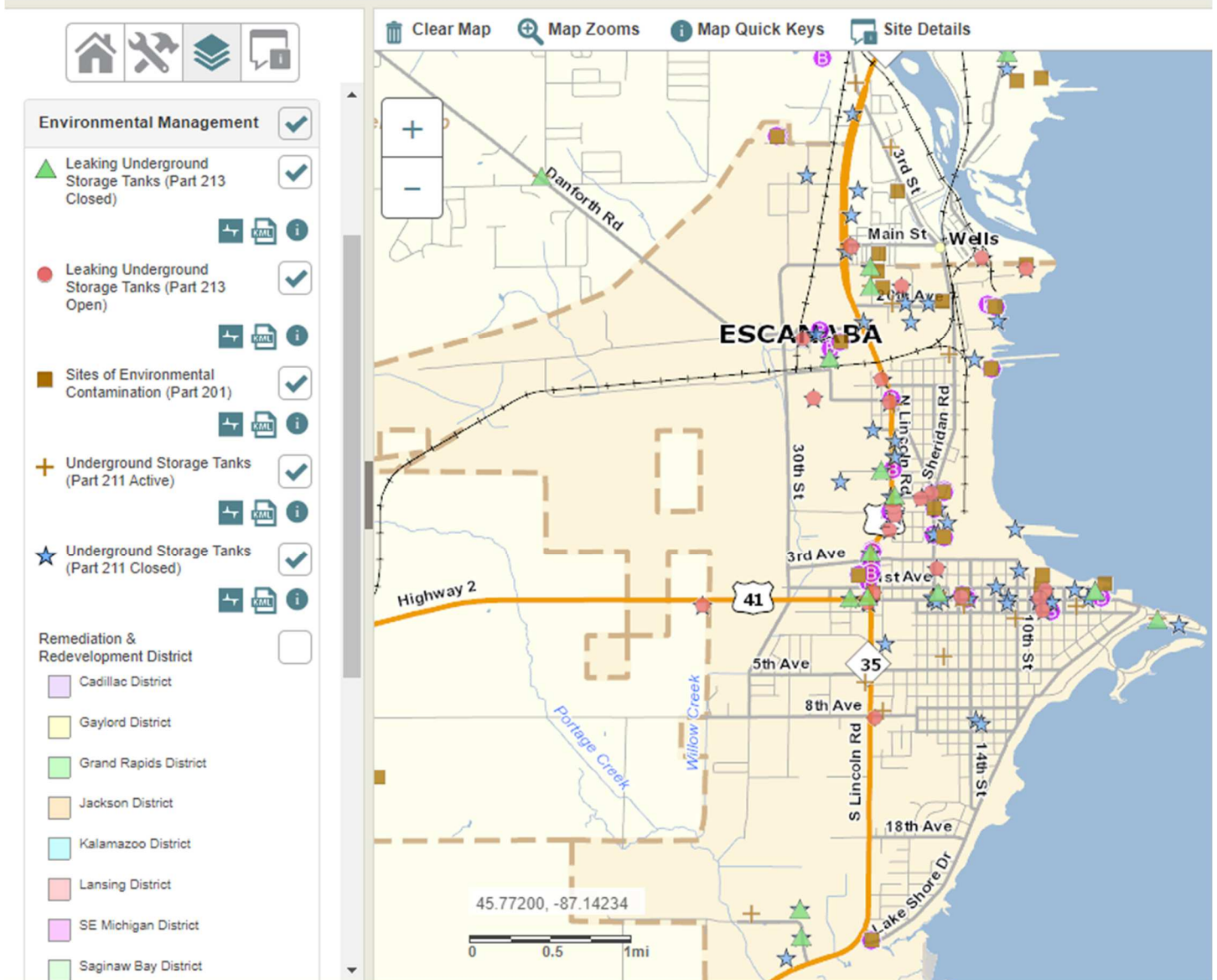
The EGLE Environmental Mapper was used to examine for potential areas with contamination. The possible and/or confirmed contamination sites and sites with underground storage tanks (116 sites) are shown in the map below and listed in the following tables attached. When individual projects are designed contaminated areas will be avoided via utility routing where possible. When construction may infringe on impacted areas, a FOIA request for these sites will be made, EGLE permitting will be pursued if appropriate, and mitigation and safety measures will be required by contractor via construction documents:

Compliance with all applicable health and safety regulations, use of properly trained personnel in accordance with OSHA requirements, preparation of a Site Health and Safety Plan in accordance with OSHA requirements, monitoring of hydrocarbon levels in the work area, proper material segregation, storage and backfill of affected soils, and use of hydrocarbon resistant gaskets (Nitrile or Viton) on the utility being installed.



Environmental Mapper

Department of Environment, Great Lakes, and Energy



City of Escanaba
Open Part 201 Sites

4/6/2020

Site Name	Address	City	Zip Code	County	Source	Pollutants	Latitude	Longitude	
21000001	Bay de Noc Oil Company - Escanaba	2715 South Lincoln Road	Escanaba	49829	Delta	Gasoline Service Station	Benzene; Ethylbenzene; Xylenes	45.715608	-87.079615
21000002	Chicago and Northwestern RNDHS	1st Avenue North	Escanaba	49829	Delta	null	Diesel fuel	45.747862	-87.05802
21000006	Escanaba Highway Garage	1st Ave North, 800 Block	Escanaba	-0-	Delta	General Government	Na; Salt	45.746586	-87.058178
21000018	South Ninth St Vlg of Wells	6344 US 2	Wells	49894	Delta	Petroleum Products	Benzene; Ethylbenzene; MTBE; Toluene; Xylenes; trans-1,2 DCE	45.776364	-87.078706
21000021	Amoco Terminal Escanaba	2230 20th Avenue North	Escanaba	48829	Delta	Petroleum Bulk Stations & Term	Benzene; Ethylbenzene; MTBE; Toluene; Xylenes	45.773389	-87.078273
21000027	Basic Marine Inc	440 North 10th Street	Escanaba	49829	Delta	Misc Repair Services	Ethylbenzene; Zn	45.747861	-87.057978
21000086	Northern Motors Rebuilders SA	800 1st Ave. North	Escanaba	49829	Delta	Transformers	null	45.74704	-87.058137
21000092	NuWay Cleaners, Escanaba	106 North 15th Street	Escanaba	49829	Delta	null	PCE; TCE	45.746164	-87.0681099
21000111	Escanaba Ore Dock Creosote	Escanaba Ore Dock 1660 Sheridan Avenue	Escanaba	49829	Delta	Railroad Transportation	Naphthalene; Coal tar	45.766128	-87.0644
21000116	Klemm/Sem-Fuels AST Overfill	2222 N 23rd Street	Escanaba	49829	Delta	null	null	45.77486	-87.078927
21000117	Former Cloverland Manufacturing, Inc.	2501 Danforth Road	Escanaba	49829	Delta	null	PCE; TCE	45.768525	-87.083559
21000120	Stephenson Ave Bulk Plant	514 Stephenson Avenue	Escanaba	49829	Delta	Petroleum Bulk Stations & Term	1,2,4 TMB; Benzene; Ethylbenzene; Xylenes	45.751277	-87.070465
21000121	Citgo Quick Food Mart	102 N Lincoln Rd	Escanaba	49829	Delta	null	null	45.746313	-87.079407
21000122	Fleet Maintenance (Act 381)	1700 20th Avenue North	Escanaba	49829	Delta	null	null	45.772169	-87.070735
21000124	Escanaba Municipal Electric Utility	2000 Power Plant Road	Escanaba	49829	Delta	null	null	45.77169	-87.06394
21000127	Former Delta County Sportsman's Club	3000 32nd Avenue North	Escanaba	49829	Delta	null	Pb	45.786672	-87.091615
21000128	Delta Plaza PCE Contamination	301 North Lincoln Rd	Escanaba	49829	Delta	null	null	45.74791	-87.08128
21000129	Commercial Property 718 Stephenson Ave	718 Stephenson Avenue	Escanaba	49829	Delta	null	null	45.75382	-87.07162
21000506	Caron Property	Street	Escanaba	null	Delta	null	null	45.747084	-87.0500457
21000536	Coplan's Iron & Metal	1610 7th Avenue North	Escanaba	null	Delta	null	null	45.755291	-87.0704452

City of Escanaba
Storage Tank Facilities

4/6/2020

Facility ID	Facility Name	Address	City	Zip Code	County	Latitude	Longitude
3540	United Parcel Service	2129 N 23RD ST	ESCANABA	49829	Delta	45.773473	-87.07975
5758	ECO Fuels	2300 Ludington St	Escanaba	49829	Delta	45.745992	-87.080185
9790	Driftwood Mobil	120 Stephenson Ave	Escanaba	49829	Delta	45.74632	-87.071227
10010	Delta County Jail	310 Ludington St	Escanaba	49829	Delta	45.746497	-87.051345
11645	Escanaba Garage & Strm	2301 23RD AVE	ESCANABA	49829	Delta	45.775179	-87.079755
14658	Bark River Culvert & Equip. Co	430 N LINCOLN RD	ESCANABA	49829	Delta	45.749899	-87.079755
14709	Delta County Airport	3300 Airport Rd	Escanaba	49829	Delta	45.718338	-87.088715
18545	Jacklin Steel Supply Co	1701 N 26th St	Escanaba	49829	Delta	45.767051	-87.084939
36214	First Bank, Upper Michigan N.a.	2301 9TH AVE	ESCANABA	49829	Delta	45.757193	-87.078411
36450	Tuff-kote Dinol Automotive Rust	800 N LINCOLN RD	ESCANABA	49829	Delta	45.754974	-87.076753
40792	Escanaba Vortac	3300 AIRPORT RD AIRPORT ENTRANCE RD	ESCANABA	49829	Delta	45.715915	-87.088587
50000286	Town & Country Motors Inc	2600 Ludington St	Escanaba	49829	Delta	45.745868	-87.082361
1224	Escanaba Schools Garage	2220 20TH AVE	ESCANABA	49829	Delta	45.773504	-87.075848
2312	Hengesh Service Station	1422 LUDINGTON ST	ESCANABA	49829	Delta	45.745961	-87.068225
5464	Former Jerrys Marathon	2301 LUDINGTON ST	ESCANABA	49829	Delta	45.745478	-87.080009
6791	Purchasing Department	120 N 8TH ST	ESCANABA	49829	Delta	45.746585	-87.057692
12327	Gas Station	1325 N LINCOLN RD	ESCANABA	49829	Delta	45.76317	-87.07736
12901	Holiday Stationstore #200	700 N Lincoln Rd	Escanaba	49829	Delta	45.753968	-87.076822
13558	Gross Common Carrier, Inc	1803 7TH AVE	ESCANABA	49829	Delta	45.754743	-87.073321
14461	Chuck Dubord Automotive	801 Stephenson Ave	Escanaba	49829	Delta	45.755128	-87.07202
15298	Krist Food Mart #5	102 N Lincoln Rd	Escanaba	49829	Delta	45.746313	-87.079407
15304	Citgo Quick Food Mart	2730 LAKE SHORE DR	ESCANABA	49829	Delta	45.777122	-87.082277
18838	The Store	901 S LINCOLN RD	ESCANABA	49829	Delta	45.73528	-87.079257
18839	Dunlaps Service	129 S 8TH ST	ESCANABA	49829	Delta	45.744782	-87.057895

Facility ID	Facility Name	Address	City	Zip Code	County	Latitude	Longitude
35264	Freudenberg/nok G.p.	2803 DANFORTH RD	ESCANABA	49829	Delta	45.768841	-87.08842
36464	Dunlaps Service	800 Ludington St	Escanaba	49829	Delta	45.745849	-87.058299
37194	Lafaves Small Engine	1507 N LINCOLN RD	ESCANABA	49829	Delta	45.765182	-87.078309
38856	Up Car Care	536 N LINCOLN RD	ESCANABA	49829	Delta	45.751957	-87.077422
38882	Escanaba Taxi Co	318 STEPHENSON AVE	ESCANABA	49829	Delta	45.748507	-87.071302
50001036	Eskey Quick Lube, Inc	626 N LINCOLN RD	ESCANABA	49829	Delta	45.753262	-87.076671
50001620	Harnishferger Corp	2525 14TH AVE	ESCANABA	49829	Delta	45.763553	-87.087018
1042	Northern Motor Co	1419 LUDINGTON ST	ESCANABA	49829	Delta	45.74519813	-87.06793793
3540	United Parcel Service	2129 N 23RD ST	ESCANABA	49829	Delta	45.773473	-87.07975
3742	Delta Sports Complex	6645 N.75 DR	ESCANABA	49829	Delta	45.740671	-87.070457
5465	Stropich Oil Co	1325 Washington Ave	Escanaba	49829	Delta	45.762948	-87.076902
5474	St. Anne Parish	2230 8TH AVE	ESCANABA	49829	Delta	45.735892	-87.078178
5758	ECO Fuels	2300 Ludington St	Escanaba	49829	Delta	45.745992	-87.080185
9790	Driftwood Mobil	120 Stephenson Ave	Escanaba	49829	Delta	45.74632	-87.071227
11705	Escanaba CO (M29120)	1005 1ST AVE	ESCANABA	49829	Delta	45.744077	-87.061372
12901	Holiday Stationstore #200	700 N Lincoln Rd	Escanaba	49829	Delta	45.753968	-87.076822
15298	Krist Food Mart #5	102 N Lincoln Rd	Escanaba	49829	Delta	45.746313	-87.079407
17526	Admiral Petroleum #5790	720 N LINCOLN RD	ESCANABA	49829	Delta	45.754367	-87.07659
18838	The Store	901 S LINCOLN RD	ESCANABA	49829	Delta	45.73528	-87.079257
19558	Amoco Oil Co	2230 20TH AVE	ESCANABA	49829	Delta	45.771902	-87.076972
21478	Immanuel Lutheran Church	600 S Lincoln Rd	Escanaba	49829	Delta	45.738412	-87.080475
33282	Harbor Tower	110 S 5th St	Escanaba	49829	Delta	45.745112	-87.053668
36134	Fueling Station	1711 SHERIDAN RD	ESCANABA	49829	Delta	45.767397	-87.069788
40742	Visitors Hospital	15198 Main St	Buchanan	49107	Berrien	45.717898	-87.09484
720	Kmart #9065	801 N LINCOLN RD	ESCANABA	49829	Delta	45.754974	-87.077146
985	State Bank Of Escanaba	112 N 11th St	Escanaba	49829	Delta	45.745943	-87.062254
1224	Escanaba Schools Garage	2220 20TH AVE	ESCANABA	49829	Delta	45.773504	-87.075848

Facility ID	Facility Name	Address	City	Zip Code	County	Latitude	Longitude
1677	Peninsula Beverage Co	2800 29TH AVE	ESCANABA	49829	Delta	45.783253	-87.087787
1840	Holy Cross Cemetery	HIGHWAY M-35	ESCANABA	49829	Delta	45.714058	-87.090403
2312	Hengesh Service Station	1422 LUDINGTON ST	ESCANABA	49829	Delta	45.745961	-87.068225
2826	Larrys Marathon	200 N 12th St	Escanaba	49829	Delta	45.74688	-87.063744
2905	Upper Peninsula State Fair	N LINCOLN RD	ESCANABA	49829	Delta	45.760803	-87.07944
2988	Coyne Chevrolet Inc	501 Stephenson Ave	Escanaba	49829	Delta	45.751544	-87.071676
3123	E&m Enterprises, Inc	400 LUDINGTON ST	ESCANABA	49829	Delta	45.745841	-87.052166
3782	Farmers Supply & Equip. Co Inc	717 Stephenson Ave	Escanaba	49829	Delta	45.745902	-87.071928
4008	Chicago & Northwestern	PO BOX 395	ESCANABA	49829	Delta	45.767068	-87.06665
4101	Jaeger Brothers, Inc	2500 9TH AVE	ESCANABA	49829	Delta	45.756265	-87.083607
5273	Escanaba Steam Laundry, Inc	707 LUDINGTON ST	ESCANABA	49829	Delta	45.745572	-87.056853
5464	Former Jerrys Marathon	2301 LUDINGTON ST	ESCANABA	49829	Delta	45.745478	-87.080009
6791	Purchasing Department	120 N 8TH ST	ESCANABA	49829	Delta	45.746585	-87.057692
8991	Shoreline Battery Co	1000 N LINCOLN RD	ESCANABA	49829	Delta	45.758344	-87.07675
9311	Upper Peninsula Concrete Pipe Co	6480 US 2-41	ESCANABA	49829	Delta	45.782025	-87.08128
10009	Miracle Shield Car Care Center	1402 Ludington St	Escanaba	49829	Delta	45.745858	-87.067175
10010	Delta County Jail	310 Ludington St	Escanaba	49829	Delta	45.746497	-87.051345
11645	Escanaba Garage & Strm	2301 23RD AVE	ESCANABA	49829	Delta	45.775179	-87.079755
12327	Gas Station	1325 N LINCOLN RD	ESCANABA	49829	Delta	45.76317	-87.07736
12385	Garceau Insurance	823 LUDINGTON ST	ESCANABA	49829	Delta	45.745575	-87.058527
13221	Escanaba Station	328 N 10TH ST	ESCANABA	49829	Delta	45.748387	-87.06096
13272	Holy Name Central Grade School	409 S 22nd St	Escanaba	49829	Delta	45.741898	-87.077937
13398	St Francis Hospital	1018 S 13TH ST	ESCANABA	49829	Delta	45.734822	-87.065699
13558	Gross Common Carrier, Inc	1803 7TH AVE	ESCANABA	49829	Delta	45.754743	-87.073321
14461	Chuck Dubord Automotive	801 Stephenson Ave	Escanaba	49829	Delta	45.755128	-87.07202
14650	Lakeshore Warehouse Co	2020 N 19TH ST	ESCANABA	49829	Delta	45.770416	-87.074608
14658	Bark River Culvert & Equip. Co	430 N LINCOLN RD	ESCANABA	49829	Delta	45.749899	-87.079755
14709	Delta County Airport	3300 Airport Rd	Escanaba	49829	Delta	45.718338	-87.088715

Facility ID	Facility Name	Address	City	Zip Code	County	Latitude	Longitude
15163	Emery Viau	1920 20TH AVE	ESCANABA	49829	Delta	45.772042	-87.075282
15304	Citgo Quick Food Mart	2730 LAKE SHORE DR	ESCANABA	49829	Delta	45.777122	-87.082277
16259	Old Dnr Garage	1126 N LINCOLN RD	ESCANABA	49829	Delta	45.759847	-87.076751
16448	Mead Corp (mead Garage)	101 POOR FARM RD	ESCANABA	49829	Delta	45.771998	-87.07245
18545	Jacklin Steel Supply Co	1701 N 26th St	Escanaba	49829	Delta	45.767051	-87.084939
18839	Dunlaps Service	129 S 8TH ST	ESCANABA	49829	Delta	45.744782	-87.057895
19175	P & J Auto Sales	622 N LINCOLN RD	ESCANABA	49829	Delta	45.753512	-87.076757
19176	Groos Auto Parts	1636 LUDINGTON ST	ESCANABA	49829	Delta	45.74586	-87.070485
19177	Autoway Truck Stop	1022 N LINCOLN RD	ESCANABA	49829	Delta	45.758569	-87.07675
19362	Clark Service Station	823 LUDINGTON ST	ESCANABA	49829	Delta	45.745462	-87.062515
19413	Delta Service Center	117 STEPHENSON AVE	ESCANABA	49829	Delta	45.745991	-87.071785
20305	Independent Roofing & Siding Co	700 Stephenson Ave	Escanaba	49829	Delta	45.753807	-87.071273
33191	St Francis Hospital	3401 Ludington St	Escanaba	49829	Delta	45.735128	-87.066408
35264	Freudenberg/nok G.p.	2803 DANFORTH RD	ESCANABA	49829	Delta	45.768841	-87.08842
35502	Great Lakes Energy Sys Sales Sev	1930 N Lincoln Rd	Escanaba	49829	Delta	45.770424	-87.080661
36214	First Bank, Upper Michigan N.a.	2301 9TH AVE	ESCANABA	49829	Delta	45.757193	-87.078411
36450	Tuff-kote Dinol Automotive Rust	800 N LINCOLN RD	ESCANABA	49829	Delta	45.754974	-87.076753
36464	Dunlaps Service	800 Ludington St	Escanaba	49829	Delta	45.745849	-87.058299
36503	Former Pearson Building	2717 DANFORTH RD	ESCANABA	49829	Delta	45.769295	-87.086607
36905	Krist Oil Co	514 Stephenson Ave	Escanaba	49829	Delta	45.751627	-87.071283
37194	Lafaves Small Engine	1507 N LINCOLN RD	ESCANABA	49829	Delta	45.765182	-87.078309
37320	Schleis Service Station	2429 LUDINGTON ST	ESCANABA	49829	Delta	45.745594	-87.080109
38409	Hilltop Campers Inc	2905 N Lincoln Rd	Escanaba	49829	Delta	45.776593	-87.08294
38653	Gasman News Agency Inc	511 1ST AVE	ESCANABA	49829	Delta	45.746617	-87.05389
38856	Up Car Care	536 N LINCOLN RD	ESCANABA	49829	Delta	45.751957	-87.077422
38882	Escanaba Taxi Co	318 STEPHENSON AVE	ESCANABA	49829	Delta	45.748507	-87.071302
39021	Escanaba Machine	1700 LUDINGTON ST	ESCANABA	49829	Delta	45.745866	-87.0718
39353	Escanaba Machine Co-owner	1719 LUDINGTON ST	ESCANABA	49829	Delta	45.745589	-87.071359

Facility ID	Facility Name	Address	City	Zip Code	County	Latitude	Longitude
40792	Escanaba Vortac	3300 AIRPORT RD AIRPORT ENTRANCE RD	ESCANABA	49829	Delta	45.715915	-87.088587
50000286	Town & Country Motors Inc	2600 Ludington St	Escanaba	49829	Delta	45.745868	-87.082361
50000986	Gallagher Marine Construction Co	PO BOX 315	ESCANABA	49829	Delta	45.77047	-87.06365
50001036	Esky Quick Lube, Inc	626 N LINCOLN RD	ESCANABA	49829	Delta	45.753262	-87.076671
50001620	Harnishferger Corp	2525 14TH AVE	ESCANABA	49829	Delta	45.763553	-87.087018
50002405	Degrad Oil Co	616 N 16TH ST	ESCANABA	49829	Delta	45.752582	-87.069979

Appendix C

Part 10: Protected Plants and Animals



1211 Ludington St.
Escanaba, MI 49829
O: 906.233.9360
www.c2ae.com

March 20, 2019

Michigan Natural Features Inventory
PO Box 13036
Lansing, MI 48901-3036

**Re: City of Escanaba, Michigan
Delta County
Water Distribution System Improvements
To Evaluate Needs and Recommend Alternatives for Improvements
Environmental Review and Evaluation**

Dear Mr. or Ms.,

On behalf of the City of Escanaba, Delta County, we are requesting review and comment of plans for improvements to their existing water distribution system.

The City of Escanaba is preparing an EGLE DWRP Program Project Plan to evaluate needs and recommended alternatives for improvements to the water distribution system. The project location spans across the following townships, ranges, and sections: 38N 22W 06, 38N 23W 01, 38N 23W 02, 39N 22W 07, 39N 22W 18, 39N 22W 19, 39N 22W 29, 39N 22W 30, 39N 22W 31, 39N 22W 32, 39N 23W 12, 39N 23W 13, 39N 23W 14, 39N 23W 24, 39N 23W 25, and 39N 23W 36.

We have enclosed a Project Summary and Location Maps. We are requesting your review and comment. Comments received within 30 days will allow them to be incorporated into the project plan prior to the preparation of the final DWRP Project Plan.

Comments can be mailed to our Escanaba office or emailed to ashley.hendricks@c2ae.com.

Sincerely,
C2AE

A handwritten signature in black ink, appearing to read 'Ashley N. Hendricks', with a long horizontal flourish extending to the right.

Ashley N. Hendricks, E.I.T.

Enclosure
cc: 20-0023 File B-10

March 20, 2020

Ashley Hendricks, EIT
Civil Engineer
C2AE
1211 Ludington Street
Escanaba, MI 49829

Rare Species Review - INVOICE #:2579

2020 DWRP Project Plan City of Escanaba Delta County, MI T38-39N R22-23W several sections	\$340.00 Standard order
--	----------------------------

*Please note: Prices will change as of October 1st.

Payment Options:

If you would like to pay with credit card you can go out to the MNFI web site and use MSU's secure credit card server. Under the Information Requests section you will see the Credit Card Payment heading, a link to this site is listed below. Please enter your own information and submit your payment accordingly. If you have any questions feel free to contact the MNFI staff person you have been working with

Link to credit card payment:
<http://mnfi.anr.msu.edu/services/rare-species-review.cfm>

If paying with check or money order, please make payable to Michigan State University. If needed, our Federal Identification Number is 38-6005984

Mail to: Michigan Natural Features Inventory
P.O. Box 13036
Lansing, MI 48901-3036



MSU EXTENSION

**Michigan Natural
Features Inventory**

P.O. Box 13036
Lansing, MI 48901

(517) 284-6200
fax: (517) 373-9566

mnfi.anr.msu.edu

Information Agreement

The Michigan Natural Features Inventory (MNFI) is a member of the Natural Heritage Program Network and is part of Michigan State University Extension. MNFI is an organization of professionals dedicated to the conservation of Michigan's special natural features. MNFI has the responsibility for inventorying and collecting information about the state's "elements of biological diversity". These data are used to guide conservation and land management activities throughout the state.

MNFI manages an ongoing and continuously updated information and research database. The database is proprietary and the most comprehensive single source of existing information on Michigan's endangered, threatened, or otherwise significant plant and animal species, natural plant communities, and other natural features. This database cannot provide a definitive statement on the presence, absence, or condition of the natural features in any given locality, since most sites have not been specifically or thoroughly surveyed. Furthermore, plant and animal populations and natural communities change with time. Therefore, the information services provided should not be regarded as a complete statement on the occurrence of special natural features of the area in question. In many cases the information may require the interpretation of a trained scientist.

The recipient(s) of the information understand that state endangered and threatened species are protected under state law (Act 451 of 1994, the Natural Resources and Environmental Protection Act, Part 365, Endangered Species Protection). Any questions, observations, new findings, violations or permitting of project activities should be conducted with the Michigan Department of Natural Resources, Wildlife Division. Contact the Endangered Species Coordinator at (517) 284-6194. The recipient(s) of the information understand that federally endangered and threatened species are protected under federal law (Endangered Species Act of 1973). Any questions, observations, new findings, violations or permitting of project activities should be conducted with the U.S. Fish and Wildlife Service in East Lansing. Their phone number is (517) 351-2555. Recipients of the information are responsible for ensuring the protection of protected species before project activities begin.

MNFI is a not-for-profit entity and fees for the data are turned back into database maintenance and program support. The costs for information can be obtained on our website MNFI.ANR.MSU.EDU under the services heading.

By acceptance of the information services made available through MNFI, the recipient understands that access to the information is provided for primary use only. MNFI requests that the user respect the confidential and sensitive nature of the information and restrict access to only those individuals requiring the information for the primary use. There should be no redistribution of the information. Distribution of information regarding locations of many rare species represents a threat to their protection. Additionally, since the information is constantly being updated MNFI requests that any information service provided by MNFI is destroyed upon completion of the primary use. This information should be considered valid for one year only.

The user should identify MNFI as information contributors on any map or publication using MNFI information, as follows: Michigan Natural Features Inventory. [Year]. Biotics 5 - Michigan's Natural Heritage Database. Lansing, Michigan. (Accessed: Month Day, Year). Abbreviations are acceptable on maps if referenced in full on accompanying documents.



MSU EXTENSION

Michigan Natural Features Inventory

P.O. Box 13036
Lansing, MI 48901

(517) 284-6200
fax: (517) 373-9566

mnfi.anr.msu.edu

Rare Species Review #2579 - 2020 DWRP Project Plan, City of Escanaba, Delta County, MI

Standard turn around

Eight-day turn around

Project or primary use of Information: Review of data for potential impacts to protected and rare species

Description of information: For the intended area (T38-39N R22-23W several sections) and 1.5 miles surrounding

Ashley Hendricks
Recipient (Please Print)

Ashley Hendricks
Signature

CAAE
Organization/Association

3/23/20
Date

Ms. Ashley Hendricks, EIT
C2AE
1211 Ludington Street
Escanaba, MI 49829
(906) 217-1014

March 26, 2020

Re: Rare Species Review #2579 – 2020 DWSRF application, City of Escanaba, Delta County, MI (T38-39N, R22-23W several sections).

Ms. Hendricks:

The location for the proposed project was checked against known localities for rare species and unique natural features, which are recorded in the Michigan Natural Features Inventory (MNFI) natural heritage database. This continuously updated database is a comprehensive source of existing data on Michigan's endangered, threatened, or otherwise significant plant and animal species, natural plant communities, and other natural features. Records in the database indicate that a qualified observer has documented the presence of special natural features. The absence of records in the database for a particular site may mean that the site has not been surveyed. The only way to obtain a definitive statement on the status of natural features is to have a competent biologist perform a complete field survey.

Under Act 451 of 1994, the Natural Resources and Environmental Protection Act, Part 365, Endangered Species Protection, "a person shall not take, possess, transport, ...fish, plants, and wildlife indigenous to the state and determined to be endangered or threatened," unless first receiving an Endangered Species Permit from the Michigan Department of Natural Resources (MDNR), Wildlife Division. Responsibility to protect endangered and threatened species is not limited to the lists below. Other species may be present that have not been recorded in the database.



MSU EXTENSION

Michigan Natural Features Inventory

PO Box 13036
Lansing MI 48901

(517) 284-6200
Fax (517) 373-9566

mnfi.anr.msu.edu

At-risk species have been documented within 1.5 miles of the project site and **it is possible** that negative impacts will occur. Keep in mind that MNFI cannot fully evaluate this project without visiting the project site. MNFI offers several levels of [Rare Species Reviews](#), including field surveys which I would be happy to discuss with you.

Sincerely,

Michael A. Sanders

Michael A. Sanders
Environmental Review Specialist/Zoologist
Michigan Natural Features Inventory

Comments for Rare Species Review #2579: It is important to note that it is the applicant's responsibility to comply with both state and federal threatened and endangered species legislation. Therefore, if a state listed species occurs at a project site, and you think you need an endangered species permit please contact: Casey Reitz, Michigan DNR Wildlife Division, 517-284-6210, or ReitzC@michigan.gov. If a federally listed species is involved and, you think a permit is needed, please contact Carrie Tansy, Endangered Species Program, U.S. Fish and Wildlife Service, East Lansing office, 517-351-8375, or Carrie_Tansy@fws.gov.

Please consult MNFI's [Rare Species Explorer](#) for additional information regarding the table below.

Special concern species and natural communities are not protected under endangered species legislation, but efforts should be taken to minimize any or all impacts. Species classified as special concern are species whose numbers are getting smaller in the state. If these species continue to decline they would be recommended for reclassification to threatened or endangered status.

Table 1: Occurrences of threatened & endangered species within 1.5 miles of #2579

ELCAT	SNAME	SCOMNAME	USESA	SPROT	G_RANK	S_RANK	FIRSTOBS	LASTOBS
Animal	<i>Sterna hirundo</i>	Common tern		T	G5	S2	1976	2007-06-08
Animal	<i>Hydroprogne caspia</i>	Caspian tern		T	G5	S2	1996	1996-06-13
Animal	<i>Sander canadensis</i>	Sauger		T	G5	S1	1970-04-15	1972-05-18
Animal	<i>Charadrius melodus</i>	Piping plover	LE	E	G3	S2	2006-06-21	2008-06-22
Animal	<i>Sterna hirundo</i>	Common tern		T	G5	S2	2006-06-21	2007-06-05
Animal	<i>Ixobrychus exilis</i>	Least bittern		T	G4G5	S3	2007-06-10	2007-06-10
Animal	<i>Coturnicops noveboracensis</i>	Yellow rail		T	G4	S2	2007-06-09	2007-06-09

Of concern:

No concerns with these listed species.

Table 2: Occurrences of special concern species & natural communities within 1.5 miles of #2579

ELCAT	SNAME	SCOMNAME	USESA	SPROT	G_RANK	S_RANK	FIRSTOBS	LASTOBS
Animal	<i>Pandion haliaetus</i>	Osprey		SC	G5	S4	2000-07-31	2007-06-06
Animal	<i>Botaurus lentiginosus</i>	American bittern		SC	G5	S3	2006-08-07	2019-05-21
Animal	<i>Cistothorus palustris</i>	Marsh wren		SC	G5	S3	2007-06-09	2007-06-11
Animal	<i>Nycticorax nycticorax</i>	Black-crowned night-heron		SC	G5	S3	2009	2009
Animal	<i>Physella magnalacustris</i>	Great Lakes physa		SC	G5	SNR		
Animal	<i>Bombus terricola</i>	Yellow banded bumble bee		SC	G3G4	SNR	1958-06-29	1958-06-29
Animal	<i>Haliaeetus leucocephalus</i>	Bald eagle		SC	G5	S4	2017	2017
Animal	<i>Haliaeetus leucocephalus</i>	Bald eagle		SC	G5	S4	2017	2017

Of concern:

Osprey - the state special concern osprey (*Pandion haliaetus*) has been known to nest in Section 18 of T39NR22W. Ospreys are most found in forested regions near lakes, large rivers, and floodings. They will nest in snags, dead topped pines, tamaracks, and man-made platforms near bodies of water. They feed on fish caught in relatively clear rivers or lakes.

Management and Conservation: their past decline has been attributed to habitat loss, human intrusion, and chemical pollution. It is recommended that land altering activities not occur within 400 meters (1/4 mile) of an active nest(s) during the nesting season (March 15 to August 31). Impacts will be minimized if work is avoided during the nesting season. If the landowner wishes to provide nesting habitat for osprey, leaving supercanopy trees, both dead and alive, which have strong wide branches high up in the canopy would be useful.

Bald eagle - the special concern bald eagle (*Haliaeetus leucocephalus*) has been known to nest in Section 25 of T39NR23W. Bald eagle nests are usually located within ½ - mile of water and at the top of tall, established trees. These birds prefer forested habitats adjacent to the shorelines of lakes, large rivers, floodings, and other bodies of water where prey is available throughout the breeding season which runs from mid-March through the end of June. Live trees are generally preferred over dead ones. In Michigan, eagles arrive on nesting territories between mid-February and mid-March. Nesting pairs are usually faithful to previous nesting sites. By October and November, immature bald eagles and most adults move southward, with many remaining in Michigan throughout the winter. Bald eagles are extremely sensitive to human activity during the first 12 weeks of the breeding season. Maintain a ¼ - mile buffer zone around the nest from mid-March through the end of June. Any maintenance and construction activities within the buffer zone should take place between August and February.

Effective August 8, 2007, the bald eagle in the lower 48 States was **removed** from the Federal List of Endangered and Threatened Wildlife (Federal Register Vol. 72, No. 130; July 9, 2007) but are still protected under the Migratory Bird Treaty Act, the Lacey Act and the [Bald and Golden Eagle Protection Act](#): which prohibits anyone from “taking” bald eagles, including their parts, eggs or nests.

To help provide clarity on the management of bald eagles after delisting, the U.S. Fish and Wildlife Service (USFWS) published National Bald Eagle Management Guidelines in May 2007. These guidelines as well as other information regarding bald eagles can be viewed at the USFWS [Midwest Bald Eagle page](#). The management guidelines were established to help people minimize harmful impacts, especially where they may constitute a “disturbance.” A variety of human activities can potentially interfere with bald eagles, affecting their ability to forage, nest, roost, breed or raise young. A [permit](#) from USFWS is recommended if you are unable to minimize or prevent disturbance, injury or potential mortality of bald or golden eagles as a result of an otherwise lawful activity. For permit information in Michigan contact Ms. Carrie Tansy, USFWS East Lansing Field Office, 2651 Coolidge Road, East Lansing, MI 48823, Ph: 517-351-8375, Carrie_Tansy@fws.gov

Codes to accompany Tables:

State Protection Status Code Definitions (SPROT)

E: Endangered

T: Threatened

SC: Special concern

Federal Protection Status Code Definitions (USESA)

LE = listed endangered

LT = listed threatened

LELT = partly listed endangered and partly listed threatened

PDL = proposed delist

E(S/A) = endangered based on similarities/appearance

PS = partial status (federally listed in only part of its range)

C = species being considered for federal status

Global Heritage Status Rank Definitions (GRANK)

The priority assigned by [NatureServe](#)'s national office for data collection and protection based upon the element's status throughout its entire world-wide range. Criteria not based only on number of occurrences; other critical factors also apply. Note that ranks are frequently combined.

G1 = critically imperiled globally because of extreme rarity (5 or fewer occurrences range-wide or very few remaining individuals or acres) or because of some factor(s) making it especially vulnerable to extinction.

G2 = imperiled globally because of rarity (6 to 20 occurrences or few remaining individuals or acres) or because of some factor(s) making it very vulnerable to extinction throughout its range.

G3: Either very rare and local throughout its range or found locally (even abundantly at some of its locations) in a restricted range (e.g. a single western state, a physiographic region in the East) or because of other factor(s) making it vulnerable to extinction throughout its range; in terms of occurrences, in the range of 21 to 100.

G4: Apparently secure globally, though it may be quite rare in parts of its range, especially at the periphery.

G5: Demonstrably secure globally, though it may be quite rare in parts of its range, especially at the periphery.

Q: Taxonomy uncertain

State Heritage Status Rank Definitions (SRANK)

The priority assigned by the Michigan Natural Features Inventory for data collection and protection based upon the element's status within the state. Criteria not based only on number of occurrences; other critical factors also apply. Note that ranks are frequently combined.

S1: Critically imperiled in the state because of extreme rarity (5 or fewer occurrences or very few remaining individuals or acres) or because of some factor(s) making it especially vulnerable to extirpation in the state.

S2: Imperiled in state because of rarity (6 to 20 occurrences or few remaining individuals or acres) or because of some factor(s) making it very vulnerable to extirpation from the state.

S3: Rare or uncommon in state (on the order of 21 to 100 occurrences).

S4 = apparently secure in state, with many occurrences.

S5 = demonstrably secure in state and essentially ineradicable under present conditions.

SX = apparently extirpated from state.

Section 7 Comments for Rare Species Review #2579

C2AE

2020 DWRP Project Plan

City of Escanaba

Delta County, MI

March 26, 2020

For projects involving Federal funding or a Federal agency authorization

The following information is provided to assist you with Section 7 compliance of the Federal Endangered Species Act (ESA). The ESA directs all Federal agencies "to work to conserve endangered and threatened species. Section 7 of the ESA, called "Interagency Cooperation," is the means by which Federal agencies ensure their actions, including those they authorize or fund, do not jeopardize the existence of any listed species."

The project falls within the range of seven (7) federally listed species which have been identified by the U.S. Fish and Wildlife Service (USFWS) to occur in Delta County, Michigan:

Federally Endangered

Gray wolf – there appears to be suitable habitat within the 1.5-mile search buffer. The gray wolf (*Canis lupus*) is the largest member of the Canid (dog) family, which includes coyotes, red fox and gray fox. Wolves have no specific habitat requirements, other than minimal disturbance from humans and a sufficiently large mammal prey base (primarily white-tailed deer but also snowshoe hare, beaver, and other mammals). Gray wolves require large extensive tracts of contiguous forests in which to range; home ranges are over 100 mi².

Management and Conservation: general management recommendations for the gray wolf include maintaining large areas of mature vegetation, maintaining a healthy prey base (primarily deer), and reducing probability of encounters with humans (settlements as well as roads). One of the greatest threats is an anti-wolf attitude by the general public based on erroneous beliefs. Education and outreach to increase public awareness and understanding of gray wolf ecology, behavior and management would enhance conservation efforts for this species.

Piping plover – there is a documented occurrence within the 1.5-mile search buffer. In the Great Lakes region, the piping plover (*Charadrius melodus*) prefers to nest and forage on sparse or non-vegetated sand-pebble beaches, averaging 100 feet in width. Vegetative cover is usually less than 5 %. Associated bodies of water and interdunal wetlands enhance these areas by increasing food availability. Optimal foraging areas are especially crucial along Lake Superior, where shoreline and benthic invertebrate communities are known to be naturally sparse. Nests are generally placed in level areas between the water's edge and the first dune. While feeding, open shoreline is preferred to vegetated beach areas. Piping plovers begin arriving in mid- to late-April. The nesting season is under way by mid-May and lasts until mid-August. The nests are simple depressions in the sand and are difficult to see. This species is declining throughout the Midwest due to habitat destruction and disturbance. People walking on the beach may inadvertently destroy nests. Dogs on the beach can be especially dangerous for chicks and adults.

Management and Conservation: this species is declining throughout the Midwest due to habitat destruction and disturbance. The nests are simple depressions in the sand and are difficult to see. People walking on the beach may inadvertently destroy nests. Dogs on the beach can be especially dangerous for chicks and adults. Piping plovers are protected under the Federal Endangered Species Act and are very sensitive to human disturbance. Please avoid activity along the shoreline in this compartment between May and September.

Federally Threatened

Northern long-eared bat - Northern long-eared bat (*Myotis septentrionalis*) numbers in the northeast US have decline Northern long-eared bat (*M. septentrionalis*) numbers in the northeast US have declined up to 99 percent. Loss or degradation of summer habitat, wind turbines, disturbance to hibernacula, predation, and pesticides have contributed

to declines in Northern long-eared bat populations. However, no other threat has been as severe to the decline as White-nose Syndrome (WNS). WNS is a fungus that thrives in the cold, damp conditions in caves and mines where bats hibernate. The disease is believed to disrupt the hibernation cycle by causing bats to repeatedly awake thereby depleting vital energy reserves. This species was federally listed in May 2015 primarily due to the threat from WNS.

Although no known hibernacula or roost trees have been documented within 1.5 miles of the project area, this activity occurs within the designated [WNS zone](#) (i.e., within 150 miles of positive counties/districts impacted by WNS). In addition, there appears to be suitable habitat as well. The USFWS has prepared a [dichotomous key](#) to help determine if this action may cause prohibited take of this bat. Please consult the USFWS [Endangered Species Page](#) for more information.

Also called northern bat or northern myotis, this bat is distinguished from other *Myotis* species by its long ears. In Michigan, northern long-eared bats hibernate in abandoned mines and caves in the Upper Peninsula; they also commonly hibernate in the Tippy Dam spillway in Manistee County. This species is a regional migrant with migratory distance largely determined by locations of suitable hibernacula sites.

Northern long-eared bats typically roost and forage in forested areas. During the summer, these bats roost singly or in colonies underneath bark, in cavities or in crevices of both living and dead trees. Roost trees are selected based on the suitability to retain bark or provide cavities or crevices. Common roost trees in southern Lower Michigan include species of ash, elm and maple. Foraging occurs primarily in areas along woodland edges, woodland clearings and over small woodland ponds. Moths, beetles and small flies are common food items. Like all temperate bats this species typically produces only 1-2 young per year.

Management and Conservation: when there are no known roost trees or hibernacula in the project area, we encourage you to conduct tree-cutting activities and prescribed burns in forested areas during October 1 through March 31 when possible, but you are not required by the ESA to do so. When that is not possible, we encourage you to remove trees prior to June 1 or after July 31, as that will help to protect young bats that may be in forested areas but are not yet able to fly.

Red knot – there appears to be suitable habitat within the 1.5-mile search buffer. The red knot (*Calidris canutus rufa*) is one of the longest-distance migrants in the animal kingdom, flying some 18,000 miles annually between its breeding grounds in the Canadian Arctic to the wintering grounds at the southern-most tip of South America. Primarily occurring along the Atlantic and Gulf coasts, small groups of this shorebird regularly use the interior of the United States such as the Great Lakes during the annual migration. The Great Lakes shorelines provide vital stopover habitat for resting and refueling during their long annual journey.

The largest concentration of rufa red knots is found in May in Delaware Bay, where the birds stop to gorge on the eggs of spawning horseshoe crabs; a spectacle attracting thousands of birdwatchers to the area. In just a few days, the birds nearly double their weight to prepare for the final leg of their long journey to the Arctic. This species may be especially vulnerable to climate change which affects coastal habitats due to rising sea levels.

Management and Conservation: applies to actions that occur along coastal areas during the Red Knot migratory window of MAY 1 - SEPTEMBER 30.

Canada Lynx – there appears to be suitable habitat within the 1.5-mile search buffer. With its large paws and long hind legs, the Canada lynx (*Lynx canadensis*) is adapted to hunting its primary prey, the snowshoe hare (*Lepus americanus*). Lynx and hares are associated with moist, cool, boreal spruce-fir forests. Hares require forests with dense understories that provide food and cover, especially during periods of deep snow. Snowshoe hares comprise a majority of the lynx diet throughout its range. Lynx prey opportunistically on other small mammals, particularly red squirrels (*Tamiasciurus hudsonicus*), and birds, especially when hare numbers are low. Canada lynx experience widespread food shortages and many die of starvation or abandon home ranges to search for adequate prey.

Management and Conservation: any management that promotes snowshoe hare populations while retaining large blocks of conifers on the larger landscape will likely benefit this species. It is quite shy of humans, so areas of minimal

intrusion (roads, snowmobile trails, campsites, etc.) should be maintained. The species is still threatened by illegal poaching, natural population lows combined with continued human-induced mortality, mismanagement of mature coniferous forests, and incidental trapping.

Dwarf lake Iris – there appears to be suitable habitat within the 1.5-mile search buffer. Dwarf lake iris (*Iris lacustris*) usually occurs near Great Lakes shorelines on sand or in thin soils over calcareous gravel or bedrock. It tolerates full sun to nearly complete shade, but appears to flower best in semi-open edge or ecotonal habitats, typically amongst scattered trees or on shoreline forest margins where it occurs with northern white cedar (*Thuja occidentalis*) and balsam fir (*Abies balsamea*). Dwarf lake iris is almost invariably associated with northern white cedar, though spruce (principally white spruce, *Picea glauca*), balsam fir, and trembling aspen (*Populus tremuloides*) may also be present in the overstory. This species has demonstrated that under certain conditions it can readily spread into artificially cleared areas with dryish, calcareous substrates, where it may clone aggressively. This species usually flowers from mid-May to early June, depending on site exposure and annual weather variations. Each flower remains open approximately three days.

Management and Conservation: since *Iris lacustris* is largely restricted to the Great Lakes shores, it is highly vulnerable to ongoing shoreline development and intensive recreation. Fortunately, this species is a persistent and rather ecologically resilient plant, and can often withstand less-than-catastrophic disturbances (e.g. overstory removal, occasional trampling, shading). It is clearly sensitive to mechanical disturbance or removal of its substrate but can often recolonize small disturbed areas if it flourishes nearby.

Pitcher's thistle – there does not appear to be suitable habitat within 1.5 miles of the search buffer. Pitcher's thistle (*Cirsium pitcheri*) grows on the open and grassland sand dunes and along the shorelines of Lakes Michigan, Superior and Huron. It is occasionally found on lag gravel associated with dunes. It is mainly found in near-shore plant communities but can also grow in all non-forested areas of a dune system. This monocarpic (once-flowering) plant produces a rosette that will mature to flowering in 2-8 years, after which the plant dies. Seeds germinate in June, and most seedlings (rosettes) appear within 1-3 meters of parent plants. The taproot of this thistle, which can reach 2 m in length, enhances its ability to survive the often desiccating conditions of its dune habitat. Pitcher's thistle blooms from approximately late-June to early September. The blooms are pollinated by insects mainly bees; some thirty insect species have been observed visiting the blooms.

Management and Conservation: - Pitcher's thistle can be locally extirpated by destruction or major disturbance of its habitat (e.g. by shoreline development, vehicular or ORV traffic, heavy foot traffic and/or intensive recreation).

USFWS Section 7 Consultation Technical Assistance can be found at:

<https://www.fws.gov/midwest/endangered/section7/index.html>

The website offers step-by-step instructions to guide you through the Section 7 consultation process with prepared templates for documenting "no effect." as well as requesting concurrence on "may affect, but not likely to adversely affect" determinations.

Please let us know if you have questions.

Mike Sanders
Environmental Review Specialist/Zoologist
Sander75@msu.edu
517-284-6215

10. Protected Plants and Animals

The MNFI found at-risk species documented within 1.5 miles of the project site; of concern was the Osprey and Bald Eagle. Disturbance to these species will be minimized. Water service replacements will be in previously disturbed areas; typically, either in paved or frequently mowed areas.

10. Protected Plants and Animals

The U.S. Fish and Wildlife Services technical assistance website on Section 7 Endangered Species Act Consultation was used to determine if the project will impact any federally listed species. According to the website, there may be the following endangered and/or threatened species present in Delta County: Canada Lynx, Gray Wolf, Northern Long-eared Bat, Piping Plover, Red Knot, Dwarf Lake Iris, and Pitcher's Thistle. There were no critical habitats found at the Action Area location. Also possibly present in Delta County includes the migratory birds: American Britten, Bald Eagle, Black Tern, Bobolink, Canada Warbler, Cape May Warbler, Dunlin, Least Bittern, Lesser Yellowlegs, Lesser Yellowlegs, Long-eared Owl, Marbled Godwit, Red-headed Woodpecker, Ruddy Turnstone, Rusty Blackbird, and Whimbrel. Furthermore, there are no refuge lands, fish hatcheries. Although there are wetlands within the IPAC area (the entire IPAC area is the City's water service area), no construction is anticipated to be near the wetlands.

The action area will be limited to already developed area (an area that is already paved or supports structures and the only vegetation is limited to frequently mowed grass or conventional landscaping). Therefore, this project will not affect suitable habitat for federally listed species. For these reasons, it can be concluded that the project will have "no effect" on listed species, their habitats, or proposed or designated critical habitat.



[Conserving the nature of America](#)

[USFWS Midwest](#)

[Midwest Ecological Services](#)

[Contact Us](#)

S7 Consultation Technical Assistance Decision Process for "No Effect" Determinations

Pipeline or Buried Utilities Projects - Step 6

Step 6. "No Effect" Determination and Documentation

A "No Effect" determination is appropriate for your project. As it is located entirely within existing, fenced, graveled/mowed, and maintained facility yards and the Karner blue butterfly is not on the county list, your project will not affect suitable habitat for any listed species. Therefore, no listed species or designated critical habitat is anticipated to be directly or indirectly affected by this action.

To document your section 7 review and "no effect" determination, we recommend that you print this page (go to File<Print Preview), fill-in the project name and date, attach your [species list](#), and file in your administrative record.

Pipeline Project Name: City of Escanaba DWRP - Water Distribution System Improvements

Date: 3/26/2020

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[Home - "No Effect" Determination Process](#)

In the Midwest

[USFWS Midwest Home](#)

[Midwest Ecological Services Home](#)

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Section 7 Consultation

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[Section 7: A Brief Explanation](#)

[Section 7: Technical Assistance](#)

[Biological Assessment Guidance](#)

[Section 7 Consultation Handbook](#)

[Contact Us](#)

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Delta County, Michigan



Local office

Michigan Ecological Services Field Office

☎ (517) 351-2555

📅 (517) 351-1443

2651 Coolidge Road Suite 101
East Lansing, MI 48823-6360

<http://www.fws.gov/midwest/endangered/section7/s7process/step1.html>

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population, even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species¹ and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries²).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

1. Species listed under the [Endangered Species Act](#) are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information.
2. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Mammals

NAME

STATUS

Canada Lynx *Lynx canadensis* Threatened
 There is **final** critical habitat for this species. Your location is outside the critical habitat.
<https://ecos.fws.gov/ecp/species/3652>

Gray Wolf *Canis lupus* Endangered
 There is **final** critical habitat for this species. The location of the critical habitat is not available.
<https://ecos.fws.gov/ecp/species/4488>

Northern Long-eared Bat *Myotis septentrionalis* Threatened
 No critical habitat has been designated for this species.
<https://ecos.fws.gov/ecp/species/9045>

Birds

NAME	STATUS
Piping Plover <i>Charadrius melodus</i> There is final critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/6039	Endangered
Red Knot <i>Calidris canutus rufa</i> This species only needs to be considered if the following condition applies: <ul style="list-style-type: none"> Only actions that occur along coastal areas during the Red Knot migratory window of MAY 1 - SEPTEMBER 30. No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/1864	Threatened

Flowering Plants

NAME	STATUS
Dwarf Lake Iris <i>Iris lacustris</i> No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/598	Threatened
Pitcher's Thistle <i>Cirsium pitcheri</i> No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/8153	Threatened

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the [FAQ below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME

BREEDING SEASON (IF A BREEDING SEASON IS INDICATED FOR A BIRD ON YOUR LIST, THE BIRD MAY BREED IN YOUR PROJECT AREA SOMETIME WITHIN THE TIMEFRAME SPECIFIED,

WHICH IS A VERY LIBERAL
ESTIMATE OF THE DATES INSIDE
WHICH THE BIRD BREEDS
ACROSS ITS ENTIRE RANGE.
"BREEDS ELSEWHERE" INDICATES
THAT THE BIRD DOES NOT LIKELY
BREED IN YOUR PROJECT AREA.)

American Bittern *Botaurus lentiginosus*

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

<https://ecos.fws.gov/ecp/species/6582>

Breeds Apr 1 to Aug 31

Bald Eagle *Haliaeetus leucocephalus*

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

<https://ecos.fws.gov/ecp/species/1626>

Breeds Dec 1 to Aug 31

Black Tern *Chlidonias niger*

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

<https://ecos.fws.gov/ecp/species/3093>

Breeds May 15 to Aug 20

Bobolink *Dolichonyx oryzivorus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 20 to Jul 31

Canada Warbler *Cardellina canadensis*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 20 to Aug 10

Cape May Warbler *Setophaga tigrina*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds Jun 1 to Jul 31

Dunlin *Calidris alpina arctica*

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

Breeds elsewhere

Least Bittern *Ixobrychus exilis*

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

<https://ecos.fws.gov/ecp/species/6175>

Breeds Aug 16 to Oct 31

Lesser Yellowlegs *Tringa flavipes*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9679>

Breeds elsewhere

Long-eared Owl *asio otus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/3631>

Breeds Mar 1 to Jul 15

Marbled Godwit *Limosa fedoa*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9481>

Breeds elsewhere

Red-headed Woodpecker *Melanerpes erythrocephalus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 10 to Sep 10

Ruddy Turnstone *Arenaria interpres morinella*

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

Breeds elsewhere

Rusty Blackbird *Euphagus carolinus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 10 to Jul 20

Whimbrel *Numenius phaeopus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9483>

Breeds elsewhere

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

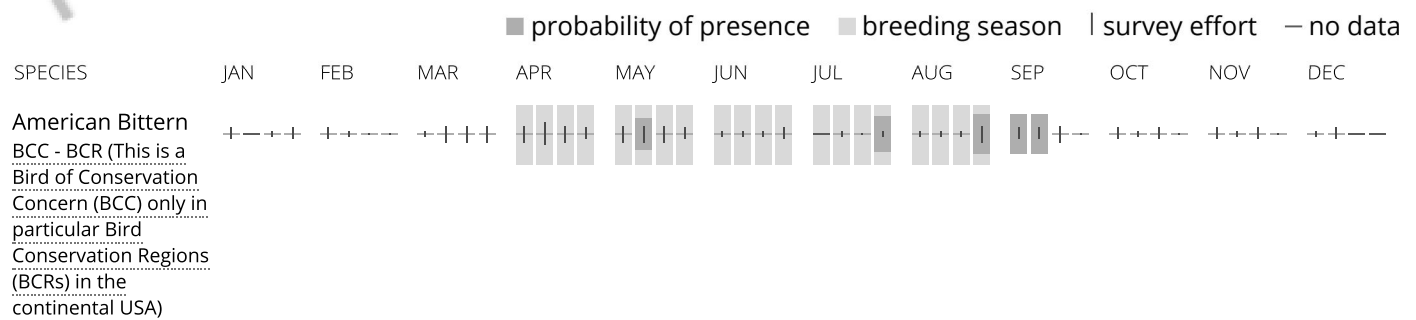
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (—)

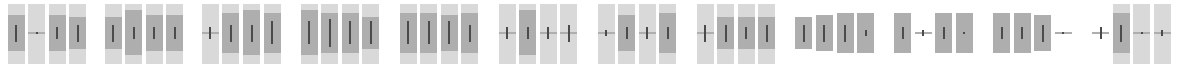
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



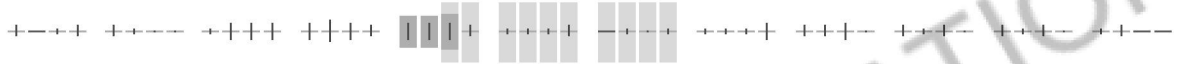
Bald Eagle
 Non-BCC Vulnerable
 (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)



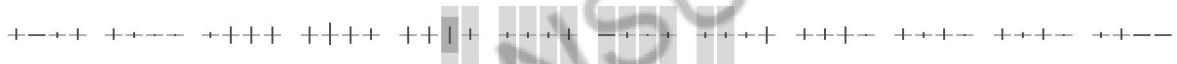
Black Tern
 BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)



Bobolink
 BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



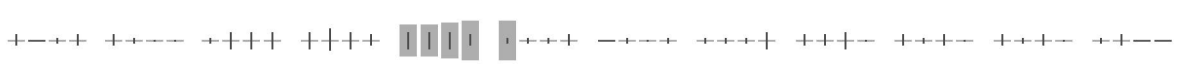
Canada Warbler
 BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



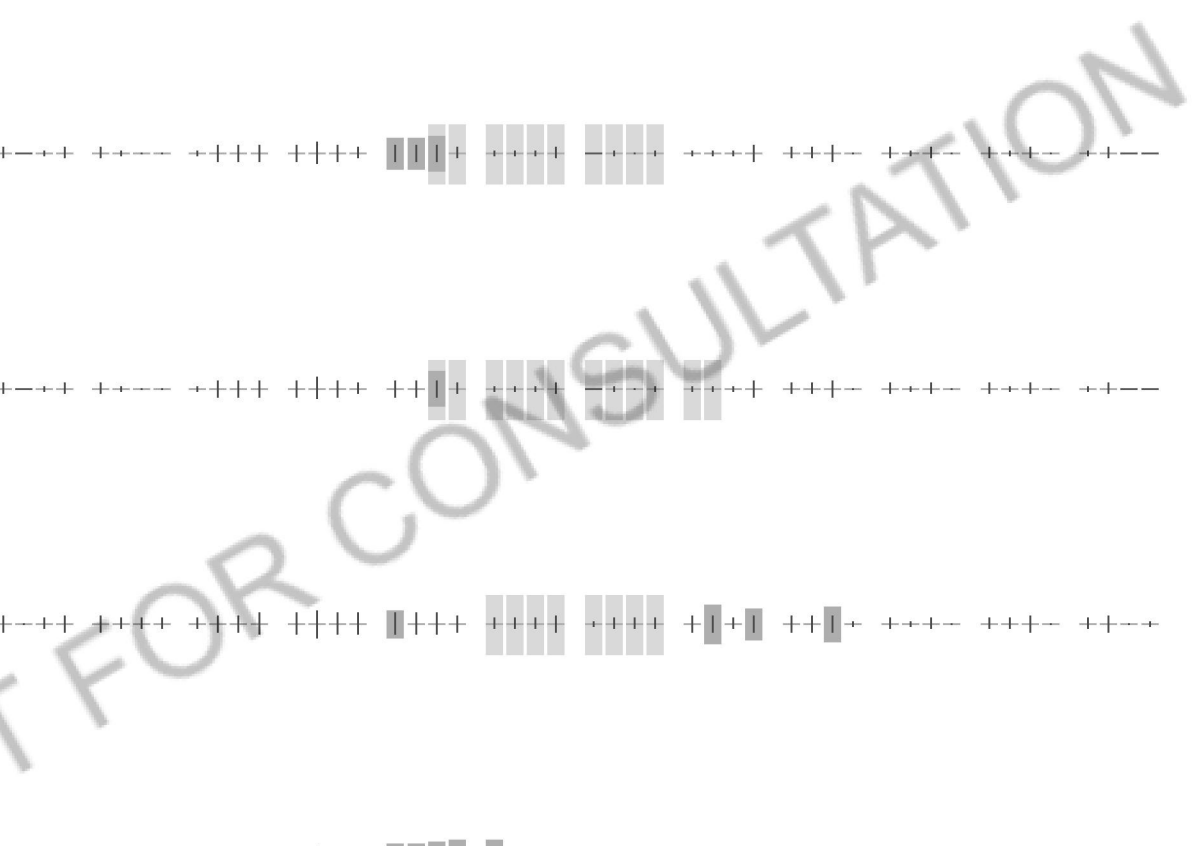
Cape May Warbler
 BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)

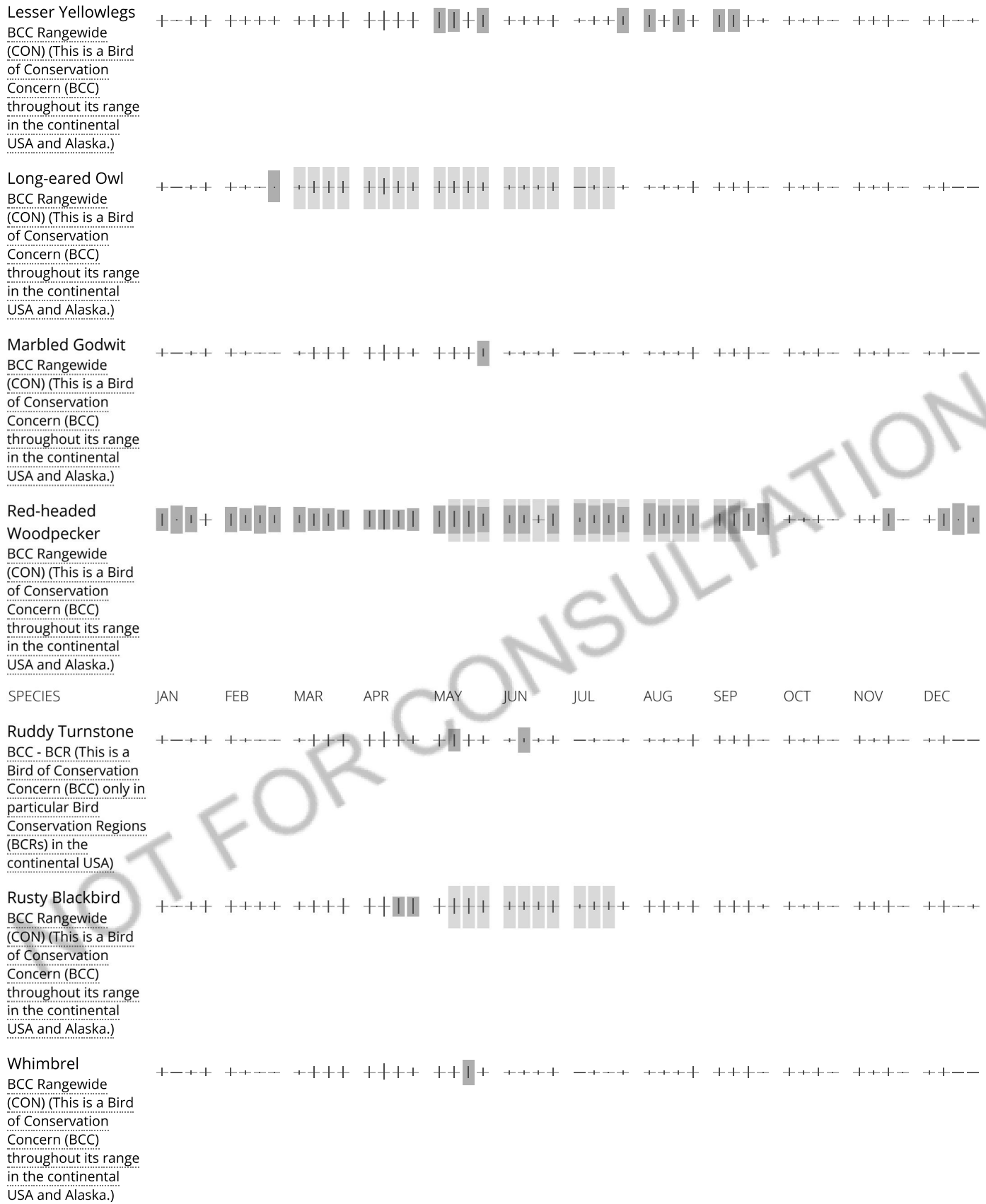


Dunlin
 BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)



Least Bittern
 BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)





Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Conservation Measures describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to

occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) and/or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [AKN Phenology Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern \(BCC\)](#) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS AT THIS LOCATION.

Fish hatcheries

THERE ARE NO FISH HATCHERIES AT THIS LOCATION.

Wetlands in the National Wetlands Inventory

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

This location overlaps the following wetlands:

FRESHWATER EMERGENT WETLAND

[Palustrine](#)

LAKE

[Lacustrine](#)

RIVERINE

[Riverine](#)

A full description for each wetland code can be found at the [National Wetlands Inventory website](#)

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters.

Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

NOT FOR CONSULTATION

Appendix C

Part 11: Regional Planning



1211 Ludington St.
Escanaba, MI 49829
O: 906.233.9360
www.c2ae.com

March 20, 2020

Dotty LaJoye
Executive Director
Central Upper Peninsula Planning & Development Regional Commission
2950 College Avenue
Escanaba, MI 49829

**Re: City of Escanaba, Michigan
Delta County
Water Distribution System Improvements
To Evaluate Needs and Recommend Alternatives for Improvements
Environmental Review and Evaluation**

Dear Ms. LaJoye,

On behalf of the City of Escanaba, Delta County, we are requesting review and comment of plans for improvements to their existing water distribution system.

The City of Escanaba is preparing an EGLE DWRF Program Project Plan to evaluate needs and recommended alternatives for improvements to the water distribution system. The project location spans across the following townships, ranges, and sections: 38N 22W 06, 38N 23W 01, 38N 23W 02, 39N 22W 07, 39N 22W 18, 39N 22W 19, 39N 22W 29, 39N 22W 30, 39N 22W 31, 39N 22W 32, 39N 23W 12, 39N 23W 13, 39N 23W 14, 39N 23W 24, 39N 23W 25, and 39N 23W 36.

We have enclosed a Project Summary and Location Maps. We are requesting your review and comment. Comments received within 30 days will allow them to be incorporated into the project plan prior to the preparation of the final DWRF Project Plan.

Comments can be mailed to our Escanaba office or emailed to ashley.hendricks@c2ae.com.

Sincerely,
C2AE

Ashley N. Hendricks, E.I.T.

Enclosure
cc: 20-0023 File B-10

Appendix C

Part 12: Stormwater Discharge Permits



1211 Ludington St.
Escanaba, MI 49829
O: 906.233.9360
www.c2ae.com

March 20, 2020

Mitch Koetje
EGLE Construction Stormwater Division
1504 W. Washington Street
Marquette, MI 49855

**Re: City of Escanaba, Michigan
Delta County
Water Distribution System Improvements
To Evaluate Needs and Recommend Alternatives for Improvements
Environmental Review and Evaluation**

Dear Mr. Koetje,

On behalf of the City of Escanaba, Delta County, we are requesting review and comment of plans for improvements to their existing water distribution system.

The City of Escanaba is preparing an EGLE DWRP Program Project Plan to evaluate needs and recommended alternatives for improvements to the water distribution system. The project location spans across the following townships, ranges, and sections: 38N 22W 06, 38N 23W 01, 38N 23W 02, 39N 22W 07, 39N 22W 18, 39N 22W 19, 39N 22W 29, 39N 22W 30, 39N 22W 31, 39N 22W 32, 39N 23W 12, 39N 23W 13, 39N 23W 14, 39N 23W 24, 39N 23W 25, and 39N 23W 36.

We have enclosed a Project Summary and Location Maps. We are requesting your review and comment. Comments received within 30 days will allow them to be incorporated into the project plan prior to the preparation of the final DWRP Project Plan.

Comments can be mailed to our Escanaba office or emailed to ashley.hendricks@c2ae.com.

Sincerely,
C2AE

Ashley N. Hendricks, E.I.T.

Enclosure
cc: 20-0023 File B-10

12. Stormwater Discharge Permit

The proposed project does not involve additional stormwater discharges nor does it include separation of combine sewer system. Construction activities are part of the water distribution system upgrades only. Construction activity will be limited to the area encompassing these upgrades. Disturbance during construction will most likely be greater than one acre. Therefore, a Part 91 SESC permit and Notice of Coverage shall be required for this project. An SESC plan will be prepared to minimize soil erosion and sedimentation leaving the site during construction. Best Management Practices will be incorporated for review and approval by ELGE.

Appendix C

Part 13: Water Withdrawal and Dewatering

13. Water Withdrawal and Dewatering

The proposed project will not require consumptive uses or diversions that would result in significant impacts to the water and water dependent natural resources. There is some dewatering that may be needed temporarily during construction. Construction is not anticipated to exceed depths more than twenty feet.