



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



LIESL EICHLER CLARK
DIRECTOR

June 18, 2019

Mr. Robert Bincsik, Director of Public Works
City of Flint
1101 South Saginaw Street
Flint, Michigan 48502

Dear Mr. Bincsik:

SUBJECT: Drinking Water Revolving Fund (DWRF)
City of Flint – Phase 6 Service Line Replacement
DWRF Project Nos. 7421-01 and 7422-01

On May 30, 2019, a Michigan Department of Environment, Great Lakes, and Energy (EGLE) staff member conducted a site visit related to the Phase 6 Service Line Replacement project. During this visit staff observed service line replacements being conducted at [REDACTED] Oak Street and [REDACTED] Oak Street. These addresses are in an area that was identified in consultation with the Michigan State Historic Preservation Office (SHPO) to be especially sensitive for the presence of and potential for archaeological sites, as early Native American ancestral human remains have previously been discovered. For planning purposes, this area has been referred to as the "Archaeological Zone." Based on comments from SHPO and an Environmental Assessment Update published by EGLE in March 2019, the following stipulations were given for service line replacements that occur in the Archaeological Zone:

The Archaeological Zone includes an area of the city bordered by Flushing Road and 5th Avenue to the north, Court Street to the south, Saginaw Street to the east, and Dupont Street to the west, this identified area requires a professional archaeologist meeting the Secretary of the Interior's Professional Qualification Standards be on site to monitor any service line replacement, excavation, or disturbance work.

As noted by EGLE staff, these two homes are located within the boundaries of the Archaeological Zone and excavation and replacement activities occurred without a professional archaeologist monitoring construction.

On June 3, 2019, EGLE confirmed that the City of Flint (City) had carried out activities in conflict with the stipulations previously agreed to for construction in the Archaeological Zone. EGLE immediately contacted the City to ensure all construction activities within the Archeological Zone ceased until an archaeologist was onsite. The City then contacted ROWE Professional Services Company, who is serving as the site manager for the project, to inform them that work in the Archaeological Zone must cease until an archaeologist is on site. EGLE staff later followed up with ROWE Professional Services Company to request a list of addresses within the Archaeological Zone where excavation or service line replacement occurred without supervision by an archaeologist. The following 29 addresses were provided:

[REDACTED] Mason Street
[REDACTED] Mc Aras Court

[REDACTED] Oak Street
[REDACTED] Oak Street

[REDACTED] Oak Street
[REDACTED] Oak Street

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████ Patrick Street
████ Sanford Place
████ W Second Avenue
████ W Second Avenue
████ W Second Avenue
████ W Second Avenue
████ W Second Avenue
████ W Second Avenue
████ W Second Avenue

████ N Stevenson Street
████ N Stevenson Street
████ N Stevenson Street
████ Stockton Street
████ Stockton Street
████ Stockton Street
████ Stockton Street
████ Stockton Street
████ Stone Street

████ Stone Street
████ Wolcott Street
████ Wolcott Street
████ Wolcott Street
████ Wolcott Street
████ Wolcott Street
████ Wolcott Street

On June 11, 2019, EGLE contacted the Saginaw Chippewa Indian Tribe of Michigan and its Tribal Historic Preservation Office to discuss the locations and nature of work that occurred without an archaeologist on site. Representatives from the Saginaw Chippewa Indian Tribe of Michigan and its Tribal Historic Preservation Office indicated that █████ Stone Street, also termed the Flint Neighborhood Improvement and Preservation Project house, is an address within the Flint Stone Street Ancestral Recovery and Reburial Project site. This site has been given the archaeological site number 20GS136 by SHPO. It is the opinion of the Saginaw Chippewa Indian Tribe of Michigan and its Tribal Historic Preservation Office that it appears unlikely that excavation would occur at █████ Stone Street without any discovery of ancestral human remains or associated funerary objects. The Saginaw Chippewa Indian Tribe of Michigan concurs with the requirement to stop work until an archaeologist is on site to monitor construction.

At the recommendation of SHPO and the Saginaw Chippewa Indian Tribe of Michigan we ask that you respond to this letter detailing the construction activities that occurred outside the agreed upon stipulations set for work in the Archaeological Zone, steps taken to correct this oversight, and the plan for future work in this area. Additionally, provide a statement summarizing interviews of all on-site personnel regarding artifacts, associated funerary objects, ancestral human remains, or burial grounds, if any, that were discovered during the excavations. When a certified archaeologist is retained by the City, a visual survey should be performed by the archaeologist at each of the 29 addresses previously listed. The archaeologist should prepare and submit a report to EGLE on the survey findings.

If you have any questions regarding this project, please contact Mr. Eric Pohan, Project Manager, Water Infrastructure Financing Section, at 517-284-5416.

Sincerely,



Karol Patton, Acting Manager
Water Infrastructure Financing Section
Financing Division
517-284-5433

cc: Ms. Sarah Jones, Saginaw Chippewa Indian Tribe of Michigan
Mr. Jeff Markstrom, ROWE Professional Services Company
Michigan State Historic Preservation Office
Mr. Eric Pohan, EGLE
Ms. Katie Kruse, EGLE