



MICHIGAN DEPARTMENT OF STATE
Candice S. Miller, Secretary of State

Lansing, Michigan 48918-0001

STATE HISTORIC PRESERVATION OFFICE
Michigan Historical Center
717 West Allegan Street
Lansing, Michigan 48918-1800

April 3, 2001

MARGARET BARONDESS
MICHIGAN DEPARTMENT OF TRANSPORTATION
425 WEST OTTAWA
PO BOX 30050
LANSING, MI 48909

RE: ER-01-19 M-15 Improvement Project, I-75 to I-69, Goodrich, Oakland and Genesee
Counties (FHWA)

Dear Ms. BarondeSS:

We have reviewed your letter dated February 15 regarding the Area of Potential Effects (APE) for the M-15 Improvement Project. Under the Section 106 regulations, the APE includes all locations where the project may directly, or indirectly, cause changes in the use or character of resources. The area of potential effects (APE) for a highway project such as this should comprise each property that could be affected by the project, and must include the whole property. If a half-acre property containing potentially historic resources may be affected by the project through the taking of part of the property or demolition of contributing resources, the entire property must be included in the APE. The same goes for a farm or other large properties. With this in mind, please revise the APE for this project accordingly, and resubmit it to this office for review and comment.

If you have any questions, please contact Martha MacFarlane-Faes, Environmental Review Coordinator, at (517) 335-2721. **Please reference our project number in all communication with our office regarding this undertaking.** Thank you for your cooperation.

Sincerely,

Brian D. Conway
State Historic Preservation Officer

BDC:JRH:ROC:bgg

copy: Ted Stone, The Corradino Group ✓
Steve Demeter, CCRG, Inc.

STATE OF MICHIGAN



JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING, PO BOX 30028, LANSING MI 48909-7528

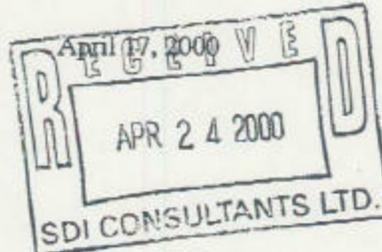
K.L. COOL, Director

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REPLY TO:
 NATURAL HERITAGE
 P.O. BOX 30160
 LANSING MI 48909

Mr. Marc Wojtczak
 SDI Consultants, Ltd.
 2000 York Road, Suite 130
 Oak Brook, IL 60523



Dear Mr. Wojtczak:

The location of the proposed project (M-15 Project) was checked against known localities for special natural features recorded in the Michigan Natural Features Inventory (MNFI) database, which is part of the DNR, Wildlife Division, Natural Heritage Program.

The MNFI database is an ongoing, continuously updated information base, which is the only comprehensive single 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 MNFI database indicate that a qualified observer has documented the presence of special natural features at a site. The absence of records in the database for a particular site may mean that the site has not been surveyed. Records are not always up-to-date, and may require verification. In some cases, 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.

The presence of threatened or endangered species does not necessarily preclude development but may require alterations in a development plan. If a threatened or endangered species has the potential to be "taken" or "harmed" by a proposed development or activity, an endangered species permit will be required from the Department of Natural Resources, Wildlife Division, under Part 365, Endangered Species Protection, of the Natural Resources and Environmental Protection Act, Act 451. Special concern species are not protected under endangered species legislation, but recommendations regarding their protection may be provided. Protection of special concern species will help prevent them from declining to the point of being listed as threatened or endangered.

The following is a summary of the results of the MNFI review of the project in:
 Oakland, Genesee Counties, M-15 between I-75 and I-69.

The following special features are known to occur on or near the site(s) and may be impacted by the project. Federally listed threatened or endangered species (marked with an asterisk *) may be affected by the project. Please contact the U.S. Fish and Wildlife Service, 2651 Coolidge Road, East Lansing, 48823 (517-351-2555) for information on federal regulations that apply to these species.

common name	status	scientific name
Poweshiek skipper	state threatened	<i>Oarisma poweshiek</i>
Massasauga rattlesnake	special concern	<i>Sistrurus catenatus</i>
Blazing star borer	special concern	<i>Papaipema beeriana</i>

The **poweshiek skipper** has been known to occur near the project area (section 12, T5N R8E). In Michigan, the poweshiek skipper inhabits alkaline wetlands known as fens. This habitat is characterized by scattered tamaracks, poison sumac, and dogwood clones with a ground cover of

sedges and other herbaceous species. The powesheik skipper has a single generation each year. Egg laying is believed to occur on sedges and rushes. Eggs are laid sometime around early July, larvae (caterpillar stage) hibernate through the winter on the underside of the blade of grass on which they have been feeding on. In early April, they resume feeding. Flight dates occur in late June through the first three weeks of July.

The Eastern massasauga rattlesnake has been known to occur in section 15, T4N R9E and in section 15, T6N R8E. Massasauga are usually associated with damp lowlands, including river bottom woodlands, shrub swamps, bogs and fens, marsh borders, sedge meadows, and moist prairie. In early summer many Massasaugas move into adjacent well-drained uplands to spend the warmer months foraging in shrubby fields and grasslands, including pastures and hay fields. These snakes usually overwinter singly in crayfish or mammal burrows, often close to the groundwater level, and emerge in April as water levels rise. They spend much time in spring basking on higher ground, such as sedge and grass clumps, muskrat and beaver lodges, or the edges of dikes and other embankments. Their diet mainly consists of small mammals.

The blazing star borer is also found in section 12, T5N R8E. This species occurs with its larval host plant, blazing star or snakeroot (*Liatris* spp.) In Michigan the species has been recorded from a variety of plant communities crossing gradients from wet to dry including lakeplain prairies, prairie fens, and sandprairie or barrens. Many Michigan sites represent only small parcels of what was once widespread habitat. At known sites associated prairie plants typically include big bluestem (*Andropogon gerardii*), Indian grass (*Sorghastrum nutans*), common mountain mint (*Pycnanthemum virginianum*), tall coreopsis (*Coreopsis tripteris*), Ohio goldenrod (*Solidago ohioensis*), Culver™s root (*Veronicastrum virginicum*), and switchgrass (*Panicum virgatum*).

The project site appears to include suitable habitat for the above listed threatened/endangered species. Potential impacts of the project that would likely negatively affect this/these species include alteration of wetland hydrology, removal of forest canopy, direct destruction of species, disturbance of critical habitat.

Because this project may affect protected species, clearance from this office in the form of a "No Effect" statement will be needed before work on this project begins. To obtain an evaluation for project clearance, please provide at least one of the following to this office:

1. description of the project area with regard to the species habitat type(s) described above. A recent photo of the project site and a map that shows habitat type(s) and location(s) of the proposed project will be necessary. This can be done by the landowner, other responsible party, or knowledgeable source (i.e. botanist, ecologist, biologist, experienced birder, etc.). This level of evaluation will only define the presence or absence of available habitat. If it is determined by this office that there is no significant available habitat, the project may be cleared at this point. If potential habitat does exist, the next level of evaluation must be undertaken (see options 2 or 3 below).
2. a statement from a knowledgeable source (see above) stating that suitable habitat is or is not present and why the project will not impact the species or habitat(s) identified above.
3. results from a complete and adequate survey by a knowledgeable source (see above) showing whether or not the above listed species are present in the affected project area. Guidelines for conducting surveys can be obtained from this office on request. For additional information and guidance for conducting surveys, including consultation with MNFI staff biologists, please contact Lori Sargent at the number below.

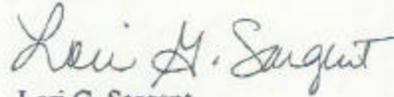
Mr. Marc Wojtczak
Proposed road project

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In most situations, the most efficient, thorough, and expeditious evaluation of the project and its impacts results from option 3.

Thank you for your advance coordination in addressing the protection of Michigan's natural resource heritage. If you have further questions, please call me at 517-373-1263.

Sincerely,



Lori G. Sargent
Endangered Species Specialist
Wildlife Division

cc:

LGS:jao