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January 31, 2024
J-1876.REV1/R-1981

Jason Jacks, P.E.
Senior Engineer
Stanley Consultants
Delivered Electronically

**RE: Seney National Wildlife Refuge Delta Creek Pool Dam Removal Project—
Section 106 Application Assistance and Cultural Resources Review, Schoolcraft
County, Michigan**

Dear Mr. Jacks,

Commonwealth Heritage Group, LLC (Commonwealth) completed a preliminary cultural resources assessment for Stanley Consultants (Client) for the Seney National Wildlife Refuge Delta Creek Pool Dam Removal project (Project) in Germfask, Schoolcraft County, Michigan (Figure 1 through Figure 25). The Client provided a textual description and images of the Project location to Commonwealth on May 26, 2023, and followed up with aerial images of the Project location on October 25, 2023 and a zipped Keyhole Markup Language (.kmz) file of the Project location to on November 6, 2023. The Project location includes the Delta Creek Dam; its associated control structure; the Culvert (1) - Route 405 Driggs River Road over Delta Creek; and the Culverts (2) - Route 405 Driggs River Road over Delta Creek in the Seney National Wildlife Refuge (Seney NWR), Germfask, Michigan. The Project Areas were photographed on November 3, 2023, by a Commonwealth architectural historian as part of the Section 106 form submission (Figure 3 through Figure 25). The Project is within the Seney NWR, which is managed by the U. S. Fish and Wildlife Service. Given the federal nexus, the Project is considered an undertaking under Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (Public Law 89-665), and is therefore subject to review by the Michigan State Historic Preservation Office (SHPO) under the Section 106 implementing regulations (36 CFR 800).

The proposed Project includes two work areas (Table 1). The proposed Project involves decommissioning the Delta Creek low-hazard dam in the Seney NWR. Planned Project activities include removing approximately 30.5 m (100.0 ft) of the Delta Creek Pool Dam embankment down to natural grade, removing the Water Control Structure, and constructing a rock 'roadway' across the breached dam opening for refuge staff to maintain access (West Project Areas, Figure 3). The work will also affect the Culvert (1) - Route 405 Driggs River Road over Delta Creek, and the Culverts (2) - Route 405 Driggs River Road over Delta Creek (East Project Area, Figure 4). These three work areas, as defined by the Client, comprise the Project Area.

Table 1. Project Area dimensions and locations

Project Area	PLSS Location	Length (N – S) Meters	Length (N – S) Feet	Width (E – W) Meters	Width (E – W) Feet	Area Hectares	Area Acres
West	T44N R14W S14 NW-SW, SW-SW & S15 NE-SE, SE-SE	285	935	139	456	1.48	3.66
East	T44N R14W S24 NW-NW	15	49	19	62	0.02	0.05
Total	-	-	-	-	-	1.50	3.71

The work areas in which ground disturbing activities are planned to occur as well as any permanent and temporary rights-of-way are assumed to be the Project Area, which is the area of potential effects (APE) for archaeological resources (Archaeology APE). Planned ground disturbing activities associated with the Project include excavation and grading to remove the existing dam embankment and water control structure, placement of the rock “roadway” across the breached dam, and rutting or other surface disturbance from the use of heavy equipment.

Dimensions of the two parts of the Archaeology APE are presented in Table 1. Overall, the Archaeology APE for the Project encompasses 1.5 ha (3.7 ac). The depth of disturbance presumably will not exceed the depth of existing disturbance.

The assumed Above-Ground APE is 38,639 ha (95,212 ac) and is considered to include those cultural resources (buildings, structures, objects, or sites) that are in the Project Area and the entirety of the Seney NWR surrounding it to account for any indirect effects, such as changes in setting.

This letter report provides the results of the background research as well as an assessment of the potential for the APEs to contain National Register of Historic Places (NRHP) eligible or listed *historic properties* that are protected under NHPA. For the background research, Commonwealth conducted a literature review at the Michigan SHPO compiling information regarding previously identified archaeological sites and surveys in the Archaeology APE and within the Seney NWR (Archaeology Study Area). Commonwealth compiled information derived from a review of the National and State Registers of Historic Places, historic aerials and maps, and online soils data for understanding the archaeological potential in the Archaeology APE. Commonwealth also conducted a desktop review of above-ground architectural/historic resources in the Above-Ground APE and in the Above-Ground Study Area, which extends in a radius of 0.8 km (0.5 mi) beyond the Above-Ground APE.

Archaeological Review

Soils

The Archaeology APE is 202 to 208 m (663 to 682 ft) above mean sea level. At each Project Area, Delta Creek flows along the north edge of the Archaeology APE. Delta Creek empties into the Driggs River approximately 175 m (574 ft) east of the East Project Area of the Archaeology APE. The Archaeology APE is within the Seney NWR, which is on the remnants of the Great

Manistique Swamp. This swamp was characterized by marshes bordered by small, sandy islands and ridges, and is in the Seney Sand Lake Plain sub-subsection of Albert's (1995) landscape ecosystem scheme for the Upper Great Lakes. This sub-subsection is characterized as a very poorly drained or excessively drained sandy lake plain with relict beach ridge and swale complexes, sand spits, transverse sand dunes, and sand bars. The sub-subsection contains the largest wetlands in Michigan, with numerous streams rising in the wetlands and meandering through the sub-subsection, creating oxbows and other fluvial landforms. The Manistique River forms the area's main watershed and flows into Lake Michigan. Soils tend to be excessively drained sands on level lake plains, outwash plains, and dune ridges and very poorly drained peaty soils on depressions and the floodplains of streams. Vegetation in the sub-subsection is primarily marshes, sedge-dominated wet meadows, shallow peatlands, and swamps. Jack pine grows on the droughty dune soils, and red pine, white pine, and aspen grow on the lake plain.

Early twentieth century efforts to drain the wetlands were abandoned due to low productivity soils (Albert 1995:169–170).

The Michigan State University Extension (2022) maps the Precontact period vegetation in most of the West and Central Project Areas as muskeg/bog, with a small shrub swamp/emergent marsh around the Delta Creek Pool in between the West and Central Project Areas and jack pine-red pine forest on the higher ground south of the Delta Creek floodplain in the Central Project Area. The mapped Precontact vegetation in the East Project Area is hemlock-white pine forest.

The U.S. Department of Agriculture Natural Resource Conservation Service (USDA NRCS) lists five soil types present in the Archaeology APE: Rousseau fine sand, 6–15% slopes; Rousseau fine sand, 15–35% slopes; Spot-Finch complex, 0–3% slopes; Ausable, Deford, and Tawas mucks; and Pelkie-Deford complex, 0–4% slopes (Table 2; Figure 26) (USDA NRCS 2024). The well drained Rousseau fine sands are found on the slopes on the margins of the Delta Creek floodplain as well as on the artificial slopes on the downstream (southeast) side of the dam.

These are sandy upland soils associated with dunes and outwash plains. Very poorly drained Ausable, Deford, and Tawas mucks are found on the Delta Creek floodplain downstream (southeast) of the dam in the West Project Area. The moderately well drained Pelkey-Deford complex, which consists of floodplain soils formed from sandy alluvium, is found in the East Project Area of the Archaeology APE.

Table 2. Soil types in the APE

Soil Code	Soil Name	Associated Landforms	Parent Material	Drainage	Acres	% of APE
24D	Rousseau fine sand, 6–15% slopes	Dunes	Eolian sands	Well drained	0.1	1.4%
24E	Rousseau fine sand, 15–35% slopes	Dunes	Eolian sands	Well drained	0.6	15.0%
26A	Spot-Finch complex, 0–3% slopes	Depressions on outwash plains	Sandy outwash	Poorly drained	<0.1	0.6%

Soil Code	Soil Name	Associated Landforms	Parent Material	Drainage	Acres	% of APE
65	Ausable, Deford, and Tawas mucks, frequently flooded	Flood plains	Woody organic material over glacial drift	Very poorly drained	2.6	69.6%
67B	Pelkie, occasionally flooded-Deford, frequently flooded, complex, 0–4% slopes	Flood plains	Sandy alluvium	Moderately well drained	<0.1	1.4%
W	Water	N/A	N/A	N/A	0.4	12.0%
Total	-	-	-	-	3.7	100.0%

Historic Land Use

Commonwealth reviewed the original Bureau of Land Management General Land Office (BLM GLO) survey map that includes Section 14, 15, and 24 in T44N R14W, as well as other historical maps, U.S. Geological Survey (USGS) topographic maps, and aerial images that include the Archaeology APE. Commonwealth also consulted previously conducted research on the historic context of the Seney NWR, completed by Commonwealth in 2021 (Remensnyder et al. 2021).

The original survey for T44N R14W was approved in 1850 (BLM GLO 1850). The original survey map shows Delta Creek and the Driggs River in their general modern channels and indicates details of the topography and vegetation, but does not depict any roads, structures, or other cultural features in or adjacent to the Archaeology APE. The BLM GLO issued patents for the aliquots in Sections 14 and 24 containing the Archaeology APE between 1868 and 1881 (Table 3) (BLM GLO 2024). The BLM GLO database does not contain any patents for land in Section 15.

Table 3. Patents issued by BLM GLO for land containing the Archaeology APE

Date	Accession	Name	PLSS Township	PLSS Section	PLSS Aliquots
3/5/1868	MI2030_078	Eric McArthur	T44N R14W	24	NW¼NW¼
6/10/1873	MW-0951-072	George E. Dole, James Elliott	T44N R14W	14	S½SW¼
6/23/1881	MI2140_129	Wilhelm Boeing	T44N R14W	14	NW¼SW¼

Commonwealth's previous historical work on the Seney NWR indicates that European contact in the region began with the establishment of French missions in Sault Ste. Marie (1668) and St. Ignace (1670), which were followed by fur trading posts, settlements, and forts (Remensnyder et al. 2021:17). The region was under the nominal administrative control of the British from 1760 to 1796, when the United States assumed control, but Euroamerican activity in the region largely was limited to the fur trade through the first decades of the nineteenth century. As the nineteenth

century progressed, the first shifts from the fur trade to other extractive industries emerged. The first commercial venture to stem from the fur trade was commercial fishing. The American Fur Trade Company became established in the fishing trade by the 1830s (Nute 1926). The logging industry also reached the eastern Upper Peninsula at this time.

Following the depletion of forest resources on the east coast of North America, loggers turned their attention to the Great Lakes region. Sawmills and logging camps were located on or near the Escanaba River, Rapid River, Sturgeon River, and Pendills Creek by the 1840s. The village of Germfask was settled in 1866 (Kopecky 2020:13). Several years later, in 1881, the village of Seney was settled. Seney initially served as a train stop on the Detroit, Mackinac, and Marquette Railroad for passengers who wanted to travel north to Grand Marais. Only one year later, logging companies, most notably the Alger, Smith Company, took advantage of the increased access granted by the railroad and moved into the area to begin logging the white pine on the Seney Plains. Immigrant workers quickly followed and Seney's population boomed to three thousand people. Despite the small population, the village boasted twenty-one saloons, ten hotels, one church, and several grocers and dry goods stores (Remensnyder et al. 2021:18–19).

By the late 1800s most of the Upper Peninsula's timber had been logged. Logging reached its peak in the Upper Peninsula shortly after the turn of the twentieth century, and lumber interests subsequently moved to western areas of the United States. By this time, most of the region's pineries were completely harvested and much of the natural vegetation had been transformed into second-growth forests and stump prairies (Remensnyder et al. 2021:18). Large fires swept through the Seney area in 1891, 1895, and 1904, leaving the land barren (Wood 2000). However, sensing an opportunity to repopulate the area, several residents formed the Upper Peninsula Development Bureau around 1910 with the hope of repurposing the land for agriculture (Remensnyder et al. 2021:19). In 1911 developers began a promotional campaign to attract farmers and settlers to the area, naming the area "Cloverland" and excavating large ditches and drainage canals to "reclaim several thousand acres of swamp" on the Seney Plain (Central Upper Peninsula and Northern Michigan University Archives 2008; Remensnyder et al. 2021:19).

However, the settlers who arrived would soon learn that the land was not suitable for agriculture at all and that the claims were grossly exaggerated. In addition to the poor soils, farming attempts throughout the Upper Peninsula were mostly unsuccessful due to a variety of factors: long distances to potential markets, the high cost of receiving goods and supplies, short growing seasons, and the collapse of market prices. Eventually, most of the resource-depleted lands became tax delinquent and reverted to the state government, forming the base for the public lands of Michigan. By the early 1930s, much of the former marsh land on the Seney Plain had been drained by the land companies, settlers and homesteaders had largely abandoned their lands, and fishing, hunting, and tourism were becoming more of a draw to tourists (Remensnyder et al. 2021:20).

A county atlas published in 1930 shows the ongoing federal land acquisition within what would become the Seney NWR, with parcels of federally owned land interspersed among parcels owned by banks, lumber companies, and private individuals (Hixson 1930). This map shows the portion of the Archaeology APE that is in Section 14 overlapping a 65-ha (160-ac) parcel owned by J. Gerves that takes up the southwest quarter of Section 14; the portion in Section 15 overlapping a 210-ha (520-ac) federally owned parcel that occupies most of Section 15; and the

portion in Section 24 overlapping a 16-ha (40-ac) parcel labeled as state tax land that makes up the northwest quarter of the northwest quarter of Section 24. A USGS topographic map published in 1931 shows the Archaeology APE along Delta Creek with scattered wetlands in the surrounding area (Figure 27) (USGS 2024). This map also shows a road running through the eastern portion of the Archaeology APE.

In 1935 Harry L. Hopkins, a federal emergency relief administrator, approved the purchase of fifty thousand acres of land in Schoolcraft County to be developed as a refuge for migratory waterfowl, administered by the Bureau of Biological Survey. Options were approved on land that was determined to be unfit for agriculture. Although about forty percent of the land had become tax delinquent and reverted to the State of Michigan, families were still living on some of the parcels that the federal government wished to acquire in order to avoid a patchwork of federal lands (Remensnyder et al. 2021:22). On December 10, 1935, President Franklin D. Roosevelt authored an executive order that officially established the Seney Migratory Waterfowl Refuge “as a refuge and breeding ground for migratory birds and other wildlife” (Roosevelt 1935).

A 1937 map (Figure 28) of the “Seney Migratory Waterfowl Refuge,” the precursor to the Seney NWR, shows numerous canals and ditches dissecting the wetlands that make up the refuge, with water management infrastructure such as open spillways, spill boxes, culverts, and pools indicated. However, none of these cultural features are shown in or near the Archaeology APE (Migratory Waterfowl Division 1937).

Dahlke’s (1958) county atlas labels the sections that make up the Seney NWR as belonging to the “U. S. Govt.” This atlas shows and labels Delta Creek and other waterways and shows a road running along the west side of the Driggs River in the east half of Section 14, well outside the Archaeology APE. This map does not depict any roads, structures, or other cultural features in or near the Archaeology APE. A county plat book published in 1963 has a label for the Seney NWR covering all of T44N R14W and does not show any cultural features in or near the Archaeology APE (Rockford Map Publishers 1963:28).

Archaeological Sites and Surveys

According to the Michigan SHPO files, no previously recorded archaeological sites are in the Archaeology APE and no previously recorded archaeological investigations occurred inside the Archaeology APE (Figure 29). The Michigan SHPO and the Seney NWR have files for seventeen previously recorded archaeological sites (20ST124 through 20ST140) in the Archaeology Study Area, defined for this Project to include the entire Seney NWR, and four previously recorded archaeological investigations (ER-2257, ER-89059, ER-89508, and ER-890059) having occurred in the Archaeology Study Area (Table 4 and Table 5; Figure 29).

All seventeen previously recorded archaeological sites are from the historic period and are included in Larsen’s (1978) report on historic and archaeological resources in the Seney NWR (ER-2257). This report indicates that some areas were field checked, but exact locations and extent of field checking was unreported. None of the sites have been evaluated for their eligibility for listing in the NRHP.

These sites include four logging camps (20ST128, 20ST129, 20ST132, and 20ST140), three

cabins (20ST125, 20ST126, and 20ST129), two farms (20ST137 and 20ST138), two railroad stations (20ST133 and 20ST134), two farmsteads/homesteads (20ST131 and 20ST136), a hunting camp (20ST135), and three sites of undetermined function (20ST124, 20ST127, and 20ST130).

The sites tend to be near named waterways, including the Driggs River (20ST125, 20ST126, 20ST127, 20ST128, 20ST129, 20ST130, 20ST132, and 20ST133); Walsh Creek (20ST131 and 20ST134); Pine Creek (20ST124); Greys Creek (20ST137); the Manistique River (20ST139), and Mead Creek (20ST140). Sites 20ST135 and 20ST136 are located near unnamed tributaries of Marsh Creek and the Manistique River, respectively. The only site not located on or near a waterway is the Chicago farm site (20ST138), which is located in between the Manistique River, which is approximately 1.2 km to the east, and the Driggs River, which is approximately 0.9 km to the west.

Table 4. Previously identified sites within the Archaeology Study Area

SHPO Site Number	Seney Refuge Identifier	Site Name	Location	Period	Culture	Function	NRHP Eligibility	In APE
20ST124	SNY-FN001	Curly	T45N R14W S20 SE-NE-NW	Historic	American	Undetermined	Unevaluated	No
20ST125	SNY-FN002	Hadsall	T45N R14W S28 SW-SW- NW	Historic	N/A	Cabin	Unevaluated	No
20ST126	SNY-FN003	Kelsey	T45N R14W S 28 W-SE-SW	Historic	N/A	Cabin	Unevaluated	No
20ST127	SNY-FN004	Cookson S Camp	T45N R14W S20 SE-NE-NW	Historic	American	Undetermined	Unevaluated	No
20ST128	SNY-FN005	Chicago Lumbering Co.	T45N R14W S17 SW-SE-SW	19 th century	American	Logging Camp	Unevaluated	No
20ST129	SNY-FN006		T45N R14W NW-SE-NE	Historic	N/A	Logging Camp	Unevaluated	No
20ST130	SNY-FN007	Old Hemlock Camp	T45N R14W S18 NE-NE-NE	Historic	American	Undetermined	Unevaluated	No
20ST131	SNY-FN008	Clark	T45N R15W S12 SW-NW- NE	Historic	N/A	Farmstead	Unevaluated	No
20ST132	SNY-FN009		T45N R15W S1 SE-SE-NE	Historic	American	Logging Camp	Unevaluated	No

SHPO Site Number	Seney Refuge Identifier	Site Name	Location	Period	Culture	Function	NRHP Eligibility	In APE
20ST133	SNY-FN010	Driggs Station	T45N R15W S35 NE-NE-NE	19 th century	American	Railroad Station	Unevaluated	No
20ST134	SNY-FN011	Walsh Station	T45N R15W S33 NE-NE-NE	19 th century	American	Railroad Station	Unevaluated	No
20ST135	SNY-FN012	Creighton	T44N R15W S12 SE-SE-SE	Historic	N/A	Hunting Camp	Unevaluated	No
20ST136	SNY-FN013	Stillson	T44N R14W S1 SE-NE-NW	Historic	N/A	Homestead	Unevaluated	No
20ST137	SNY-FN014	Cheesboro	T44N R13W S8 NE-NW-NE	Historic	N/A	Farm	Unevaluated	No
20ST138	SNY-FN015	Chicago	T44N R14W C- E	Historic	N/A	Farm	Unevaluated	No
20ST139	SNY-FN016	Painter	T44N R13W S17 SW-SW- SW	Historic	N/A	Cabin	Unevaluated	No
20ST140	SNY-FN017		T44N R13W S30 NW-NW- NE	Historic	American	Logging Camp	Unevaluated	No

Table 5. Previous archaeological investigations conducted within the Archaeology Study Area

ER Number	Report Title	Reference	Comments	Includes APE
ER- 2257	Historic and Archaeological Sites, in Technical Report for the Seney National Wildlife Refuge	(Larsen 1978)	This report summarizes the existing knowledge concerning archaeological and historical sites in the Seney NWR. No prehistoric and few historic archaeological sites are known within the refuge's boundaries. Some areas were field checked during this project, but the exact locations and extent of field-checking was unreported. Sites notes on the project map were given state designations 20ST124-140. The text omits any discussion concerning these sites.	No
ER- 89508	1990 Great Lakes Gas Transmission Company Pipeline Expansion Projects: Michigan TCPL-2/Loops 11-14, 16-17 Addendum J- Additional Extra Work Space	(Branstner 1991b)	This survey was conducted on one acre in Section 30, T44N, R13W using Phase I archaeological techniques. No archaeological remains were found.	No
ER- 890059	A Phase I Archaeological Survey of the Driggs River Timber Sale, Seney National Wildlife Refuge, Schoolcraft County, Michigan	(Branstner 1991a)	A survey was conducted on 70 acres in Section 36, T46N, R15W, Sections 1 and 12 T45N, R15W, and Section 6, T45N, R14W. No archaeological sites were encountered.	No
ER- 890059	Seney National Wildlife Refuge Draft Comprehensive Conservation Plan and Environmental Assessment	(Casselman et al. 2008)	Conservation plan and environmental assessment for the Seney National Wildlife Refuge. Page 20 indicates that 40 recorded cultural resource properties have been recorded on the Refuge. The EA does not include any specific information about any sites.	No

Previous investigation ER-2257 is a desktop study that summarizes “the existing knowledge concerning archaeological and historical sites” within the Seney NWR (Larsen 1978). The bibliography report on file for ER-2257 with Michigan SHPO states that some areas were field verified, but that the report does not include the exact locations and extent of fieldwork or any discussion of the sites. As a result, the basis for placing sites on the 1978 map (i.e., field survey, historical reference, informant information, or other) is not known. The aerial distribution of the previously identified sites, mainly along named waterways, may be the result of survey conducted along the area’s major waterways or the result of post contact period preferential site placement. Two previous investigations within the Seney NWR are assigned environmental review number ER-890059. The first is a survey conducted in 1991 on 70 acres in Section 36 of T46N R15W, Sections 1 and 12 of T45N R15W, and Section 6 of T45N R14W in support of the Driggs River Timber Sale (Figure 29) (Branstner 1991a). This survey did not result in the identification of any archaeological sites. The second project included under ER-890059 is a conservation plan and environmental assessment prepared for the Seney NWR (Casselman et al.

2008). The bibliography report on file with Michigan SHPO for ER-890059 states that there are 40 recorded cultural resource properties on the refuge. The environmental assessment does not include any specific information about any of the cultural resource properties; therefore, it is assumed that 17 of the 40 previously identified cultural resource properties are the archaeological sites referred to in Larsen's (1978) report and the remaining 23 previously identified cultural resource properties are not archaeological sites.

The ER-89508 survey was conducted in 1990 on one acre in Section 30 of T44N R13W, in support of a gas pipeline expansion project (Figure 29) (Branstner 1991b). No archaeological remains were found during either project.

Above-Ground Resources

For the Seney NWR Delta Creek Pool Dam Removal Project, the Above-Ground APE that accounts for indirect effects is considered to include those cultural resources (buildings, structures, objects, or sites) that are in the Project Area and the entirety of the Seney NWR surrounding it. Commonwealth conducted a literature review for the Above-Ground APE and Above-Ground Study Area, which extends 0.8 km (0.5 mi) beyond the Refuge boundary, to identify any previously recorded above-ground resources (Figure 30). Review of SHPO survey files revealed that there are two previously recorded above-ground resources in the Above-Ground Study Area or Above-Ground APE; the Ten Curves Road/Manistique River Bridge and the Seney National Wildlife Refuge Historic District.

The Ten Curves Road/Manistique River Bridge was listed in the NRHP on December 17, 1999 (NRIS # 99001538; National Park Service 1999). Project activities will not affect this historic resource because it is no longer extant (United States Department of Transportation 2023).

The Seney National Wildlife Refuge Historic District includes the Project Area and makes up the entirety of the Above-Ground APE. The Refuge has been determined eligible for inclusion in the NRHP by Michigan SHPO (2021). The Refuge is significant under Criterion A in the area of Politics/Government for its associations with the United States Fish and Wildlife Service, the New Deal, the Civilian Conservation Corps (CCC), the Works Progress Administration (WPA), and the Civilian Public Service (CPS). It is also significant in the area of Conservation for its associations with the U.S. Fish and Wildlife Service's (then the Bureau of Biological Survey) large-scale habitat restoration efforts to convert cutover, burned, and drained land for agriculture to land that provided wildlife habitat, and in the area of Recreation for its associations with tourism, birdwatching, hunting, and fishing in the central Upper Peninsula. The Refuge is also significant under Criterion C, for Engineering because it was the first national wildlife refuge in Michigan to engineer a system of dams, dikes, and pools to create habitat for wildlife.

Planned Project activities include removing the Delta Creek Dam and the associated water control structure to return a portion of the managed wildlife area to native wetland/upland conditions that existed prior to construction of the refuge pond system. The Delta Creek Dam and its water control structure have been determined to be contributing resources to the Seney National Wildlife Refuge Historic District. The dam and water control structure were constructed ca. 1937 by the CCC, WPA, and refuge staff as part of the early development of the refuge. The dam is built of sand and is approximately 1.2 km (0.8 mi) in length. It extends across Delta

Creek, creating the 5.3 ha (13.0 ac) Delta Creek Pool (Remensnyder et al. 2021). Removing the dam and the associated water control structure will change the designed landscape of the refuge and will eliminate Delta Creek Pool, which will result in an adverse effect to the district.

The planned activities are also expected to affect the Culvert (1) - Route 405 Driggs River Road over Delta Creek, and the Culverts (2) - Route 405 Driggs River Road over Delta Creek. The culverts were constructed in 1968 by refuge staff. They have been determined to be non-contributing resources to the Seney National Wildlife Refuge Historic District because they were constructed after the period of significance. Removing the Route 405 Driggs River Road over Delta Creek culverts will have no adverse effect on the district.

Recommendations

According to the Michigan SHPO files, no previously recorded archaeological sites are in the Archaeology APE. Thus, the Project as planned will not affect previously recorded archaeological sites listed in or eligible for listing in the NRHP. Commonwealth's literature review reveals that the sediments in the Archaeology APE were disturbed by the construction of the Delta Creek Dam and its associated infrastructure in ca. 1937, making the preservation of Precontact period archaeological features or artifacts unlikely. However, the Archaeology APE has not been subjected to archaeological survey and, given that it is located along a named waterway, the Archaeology APE has an elevated potential to contain historic period archaeological features or artifacts associated with late nineteenth century logging or early to mid-twentieth century federal activities. Therefore, Commonwealth recommends further archaeological investigation of the APE in areas where ground disturbing activity is planned.

Specifically, Commonwealth recommends a Phase I archaeological survey (pedestrian walkover observation and the excavation of shovel test pits) be conducted within the Archaeology APE in areas of planned ground disturbing activity prior to the commencement of ground disturbing activities.

Based on the literature review, there are two previously recorded above-ground resources in the Above-Ground Study Area or Above-Ground APE, the Ten Curves Road/Manistique River Bridge and the Seney National Wildlife Refuge Historic District. The Ten Curves Road/Manistique River Bridge is listed in the NRHP. Project activities are not expected to affect this historic resource because it is no longer extant.

The Seney National Wildlife Refuge Historic District includes the Project Area and makes up the entirety of the Above-Ground APE. It has been determined eligible for inclusion in the NRHP by Michigan SHPO under Criteria A in the area of Politics/Government and Criteria C for Conservation and Recreation. The Delta Creek Dam and the associated water control structure have been determined to be contributing resources to the district. The removal of the Delta Creek Dam and water control structure will alter the designed landscape and will eliminate the Delta Creek Pool, which will result in an adverse effect on the district.

The planned activities are also expected to affect the Culvert (1) - Route 405 Driggs River Road over Delta Creek, and the Culverts (2) - Route 405 Driggs River Road over Delta Creek. The culverts were constructed in 1968 by refuge staff. They have been determined to be non-

contributing resources to the Seney National Wildlife Refuge Historic District because they were constructed after the period of significance. Removing the Route 405 Driggs River Road over Delta Creek culverts will have no adverse effect on the district.

Commonwealth is pleased to have been able to assist with your cultural resource review. Please do not hesitate to contact either of us or Ethan Epstein (715-482-0273; ethan.epstein@chg-inc.com), Regional Director of Archaeology, if you have any questions or concerns related to this letter or require assistance with future cultural resources projects.

Sincerely,



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Freedom of Information Act (FOIA) Notice

The location of any archaeological site is considered sensitive information and is protected from release under the Freedom of Information Act (FOIA). Site location data should not be released to the public because the information may create a risk, harm, theft, or destruction of a non-renewable resource. Information on archaeological sites should only be shared with those individuals directly involved with the subject project. Archaeological site information should not be used for future unrelated projects.

References Cited

Albert, D. A.

- 1995 *Regional Landscape Ecosystems of Michigan, Minnesota, and Wisconsin: A Working Map and Classification*. General Technical Report NC-178. United States Department of Agriculture, Forest Service, North Central Forest Experiment Station, St. Paul, Minnesota.

BLM GLO

- 1850 United States Department of the Interior Bureau of Land Management General Land Office Plat Map of T44N R14W.
https://glorerecords.blm.gov/details/survey/default.aspx?dm_id=32227, accessed January 17, 2024.
- 2024 Records Database. *United States Department of the Interior Bureau of Land Management General Land Office*. <https://glorerecords.blm.gov/default.aspx>, accessed January 22, 2024.

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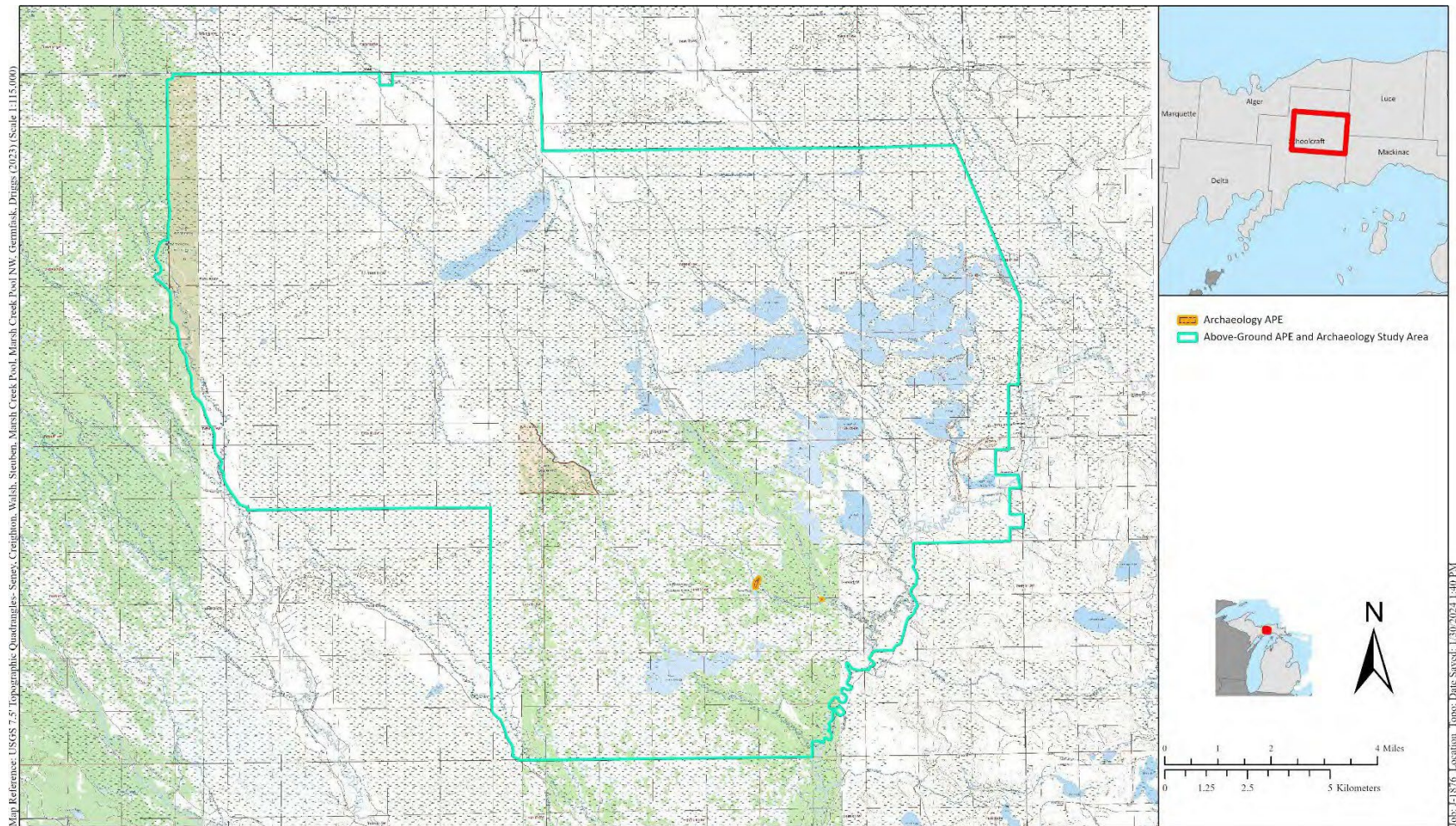


Figure 1 Project Area, Above-Ground APE/Archaeology Study Area, and Above-Ground Study Area displayed on the Seney, Creighton, Walsh, Steuben, Marsh Creek Pool, Marsh Creek Pool NW, Germfask, and Driggs topographic quadrangles

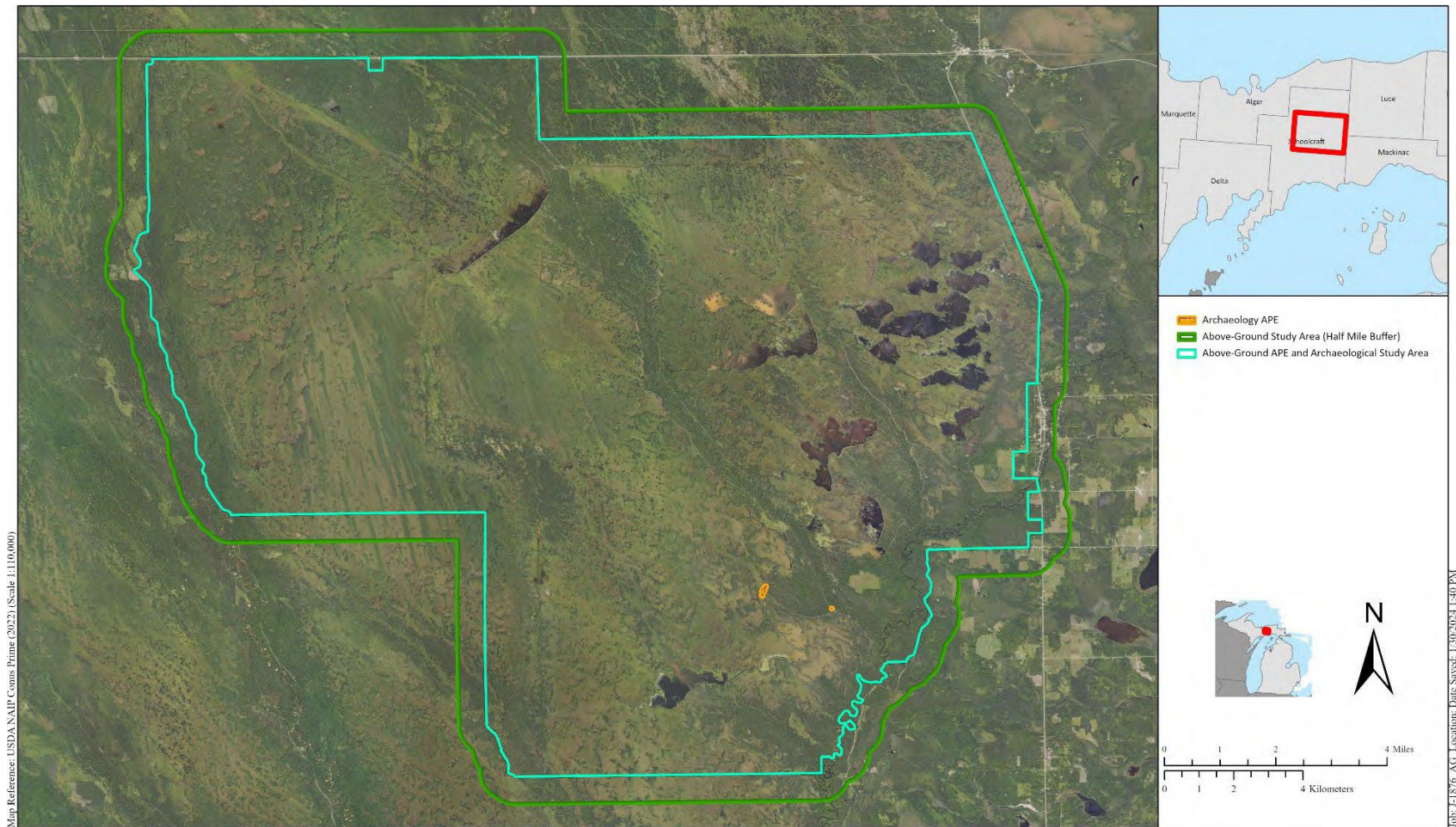


Figure 2 Project Areas, Above-Ground APE, Archaeology Study Area, and Above-Ground Study Area displayed on a 2022 aerial image



Figure 3 West Project Area and photo directions displayed on a 2022 aerial image



Figure 4 East Project Area and photo directions displayed on a 2022 aerial image



Figure 5 Project Area, Delta Creek Dam, view to the north



Figure 6 Project Area, Delta Creek Pool, view to the northeast



Figure 7 Project Area, Delta Creek Dam, view to the south



Figure 8 Project Area, West bank of Delta Creek Pool and water control structure, view to the north



Figure 9 Project Area, Delta Creek Dam and water control structure, view to the northeast



Figure 10 Project Area, west bank of Delta Creek Pool and water control structure, view to the north



Figure 11 Project Area, water control structure, view to the southeast



Figure 12 Project Area, west bank of Delta Creek Pool, view to the northwest



Figure 13 Project Area, Delta Creek Dam, view to the southwest



Figure 14 Project Area, Delta Creek Dam, view to the northeast



Figure 15 Project Area, Delta Creek Dam, view to the southwest



Figure 16 Project Area, Delta Creek pool, view to the southeast



Figure 17 Project Area, Delta Creek Dam, view to the northeast



Figure 18 Project Area, Delta Creek Dam, view to the north



Figure 19 Project Area, Delta Creek Pool, view to the northwest



Figure 20 Project Area, Driggs River Road Delta Creek Culvert, view to the southeast



Figure 21 Project Area, Driggs River Road Delta Creek Culvert, view to the west



Figure 22 Project Area, Driggs River Road Delta Creek Culvert, view to the southeast



Figure 23 Project Area, Driggs River Road Delta Creek Culvert, view to the south



Figure 24 Project Area, Delta Creek east of Driggs Reiver Road, view to the southeast



Figure 25 Project Area, Driggs River Road Delta Creek Culvert, view to the south

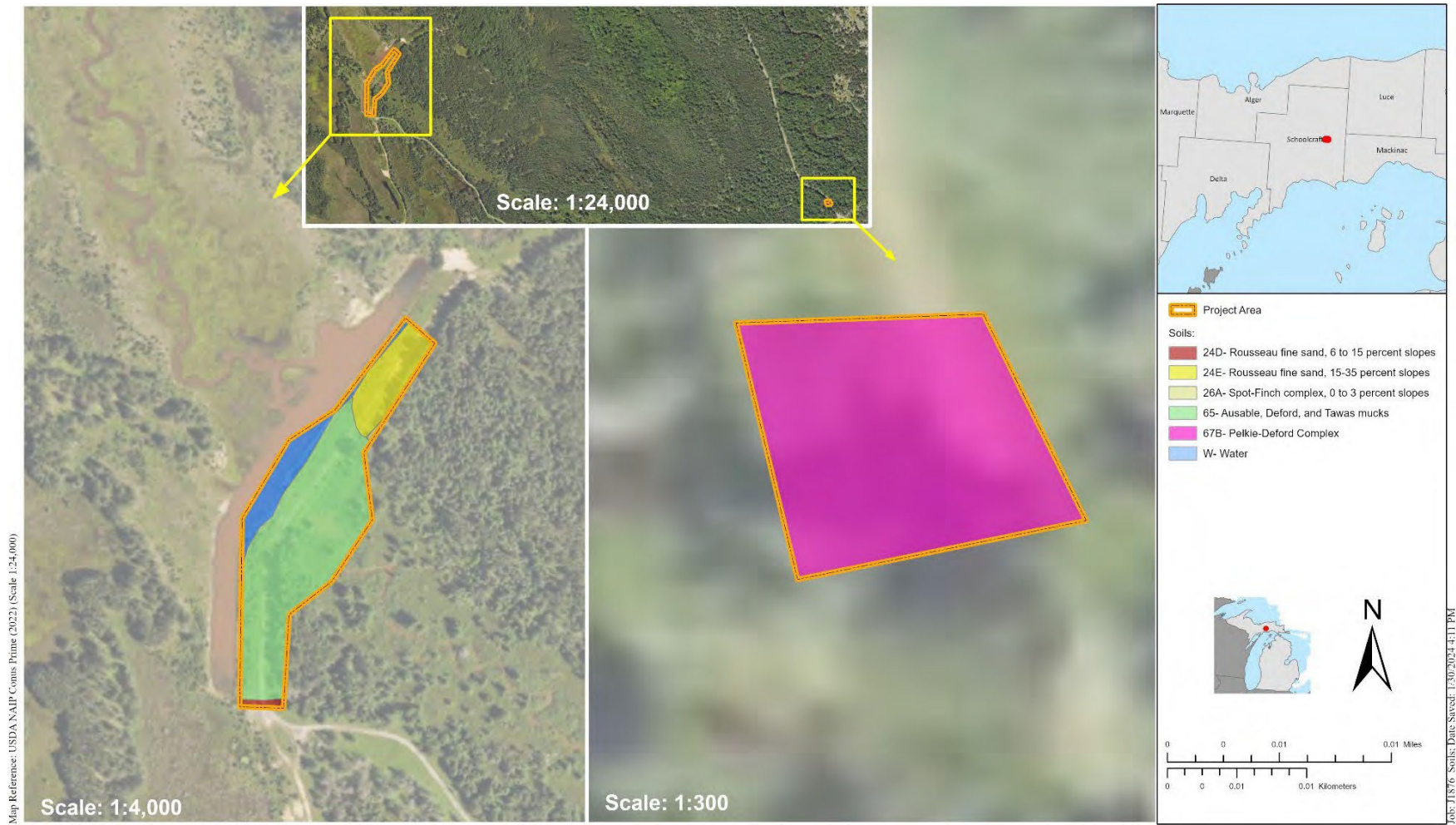


Figure 26 Identified soils

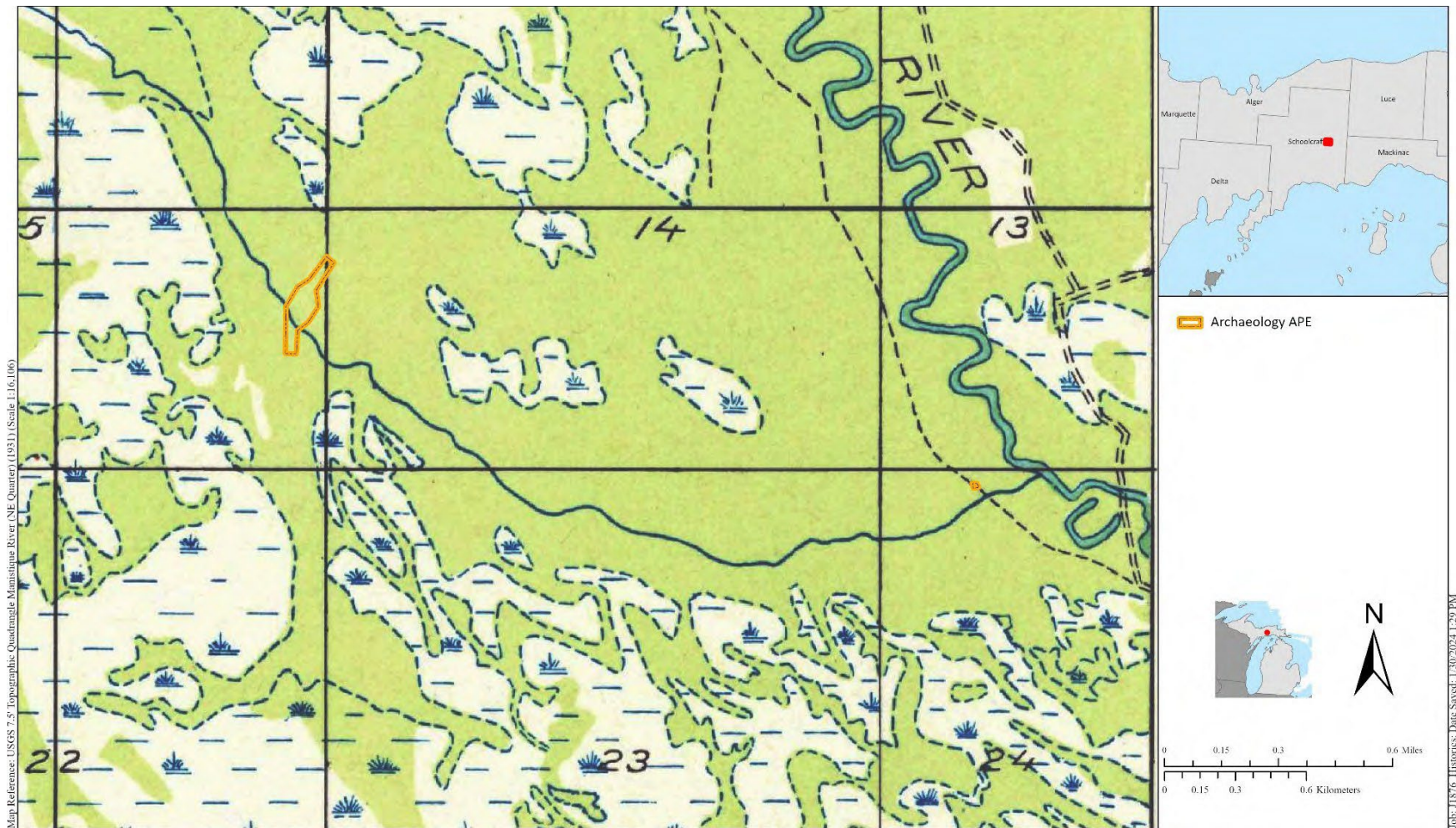


Figure 27 Archaeology APE georeferenced to the Manistique River NE (1931) USGS topographic quadrangle (USGS 2024)



Figure 28 Archaeology APE georeferenced to a 1937 refuge map (Migratory Waterfowl Division 1937)

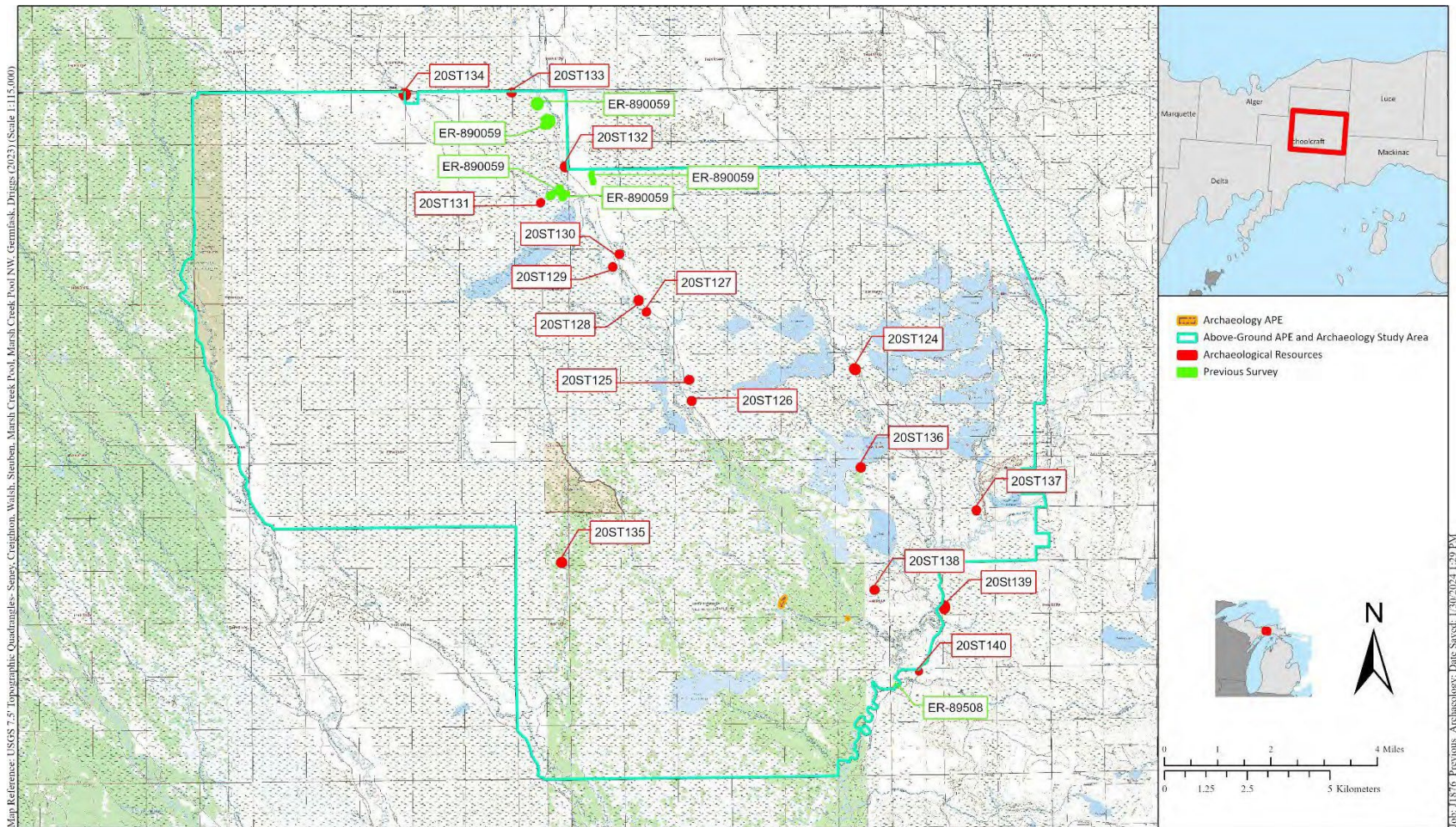


Figure 29 Archaeological sites and investigations

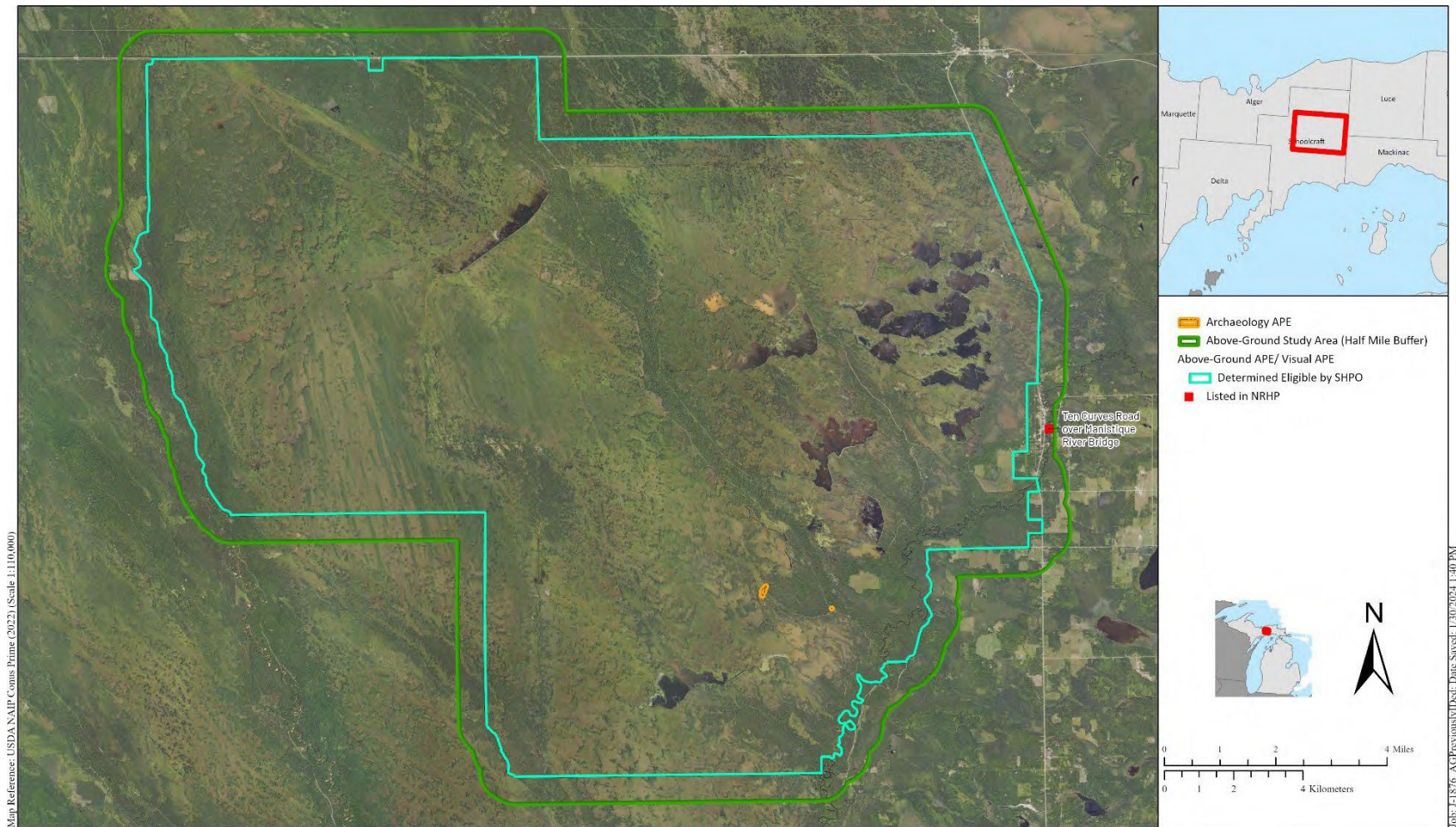


Figure 30 Project Area and previously identified above-ground resource map

IDENTIFICATION FORMS

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Michigan SHPO Architectural Properties Identification Form



Rewritten to be in a more accessible format. All information is transcribed from the official document. The official document is available upon request.

Property Overview and Location

Street Address: Dam Low Hazard – Delta Creek Pool

City/Township, State, Zip Code: Germfask, Michigan, 49883

County: Schoolcraft

Assessor's Parcel #: None

Latitude/Longitude (to the 6th decimal point): Lat: 46.202279, Long: -86.031874

Ownership: Public-Federal

Property Type

Structure



Architectural Information

Construction Date: ca. 1938

Eligibility

Component of a Historic District: Contributing to a district

Integrity – Does the property possess integrity in all or some of the 7 aspects? Location (yes); Design (yes); Materials (yes); Workmanship (yes); Setting (yes); Feeling (yes), Association (yes)

Area(s) of Significances: Nothing listed.

Period(s) of Significance: Nothing listed.

General Integrity: Nothing Listed.

Historic Name: Nothing Listed.

Current/Common Name: Dam Low Hazard – Delta Creek Pool

Historic/Original Owner: Nothing Listed.

Historic Building Use: Landscape/Conservation Area

Current Building Use: Landscape/Conservation Area

Architecture/Engineer/Designer: Nothing Listed

Builder/Contractor: Civilian Conservation Corps (CCC), Works Progress Administration (WPA), Refuge Staff

Survey Date: November 3, 2023

Recorded by S. Reyes

Narrative Architectural Description

Provide a detailed description of the property, including all character defining features and any accessory resources.

The Delta Creek Pool Dam is built of sand and is approximately 0.75 miles long. The dam extends across Delta Creek, creating the 13-acre Delta Creek Pool. Delta Creek Road to Marsh Creek Road follows the top of the dam, and there is one water control structure: the Delta Creek Pool to Delta Creek WCS.

History of the Resource

Provide information on previous owners, land use, construction and alteration dates in a narrative format. This is required for all intensive level surveys and designation and recommended for other identification efforts.

The Delta Creek Pool Dam was built ca. 1937 by the CCC, WPA, and refuge staff.

Statement of Significance/Recommendation of Eligibility

Provide a detailed explanation of the property's eligibility for the National Register, including an evaluation under at least one of the four criteria, discussion of the seven aspects of integrity, and recommendations about eligibility. This is required for all properties.

The Delta Creek Pool Dam is recommended contributing to the Seney National Wildlife Refuge Historic District. It retains much of its integrity and reflects the early development of the refuge, and the efforts of refuge staff working in coordination with the CCC and WPA to restore wildlife habitat, fulfilling goals of both the New Deal and the Bureau of Biological Survey.

References

List references used to research and evaluate the individual property.

Remensnyder, Katie, Sarah Reyes, and Ethan Epstein, *National Register of Historic Places Eligibility Evaluation for the Seney National Wildlife Refuge* (Dexter, MI: Commonwealth Heritage Group, Inc. 2021).



Figure 1 Dam Low Hazard - Delta Creek Pool, view to the north



Figure 2 Dam Low Hazard - Delta Creek Pool, view to the south



Figure 3 Dam Low Hazard - Delta Creek Pool, view to the southwest



Figure 4. Dam Low Hazard - Delta Creek Pool, view to the northeast



Figure 5. Dam Low Hazard - Delta Creek Pool, view to the northeast



Figure 6. Dam Low Hazard - Delta Creek Pool, view to the southwest

Michigan SHPO Architectural Properties Identification Form



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Property Overview and Location

Street Address: Culvert (1) - Route 405 Driggs River Rd over Delta Creek

City/Township, State, Zip Code: Germfask, Michigan, 49883

County: Schoolcraft

Assessor's Parcel #: None

Latitude/Longitude (to the 6th decimal point): Lat: 46.200906, Long: -86.006742

Ownership: Public-Federal

Property Type

Structure



Architectural Information

Construction Date: 1968

Eligibility

Component of a Historic District: Non-contributing to a district

Integrity – Does the property possess integrity in all or some of the 7 aspects? Location (yes); Design (yes); Materials (yes); Workmanship (yes); Setting (yes); Feeling (yes), Association (yes)

Area(s) of Significances: Nothing listed.

Period(s) of Significance: Nothing listed.

General Integrity: Intact

Historic Name: Nothing Listed.

Current/Common Name: Culvert (1) - Route 405 Driggs River Rd over Delta Creek

Historic/Original Owner: Nothing Listed.

Historic Building Use: Landscape/Conservation Area

Current Building Use: Landscape/Conservation Area

Architecture/Engineer/Designer: Nothing Listed

Builder/Contractor: Refuge Staff

Survey Date: November 3, 2023

Recorded by S. Reyes

Narrative Architectural Description

Provide a detailed description of the property, including all character defining features and any accessory resources.

This culvert runs under Route 405 Driggs River Road and carries Delta Creek. A pair of additional culverts is a short distance to the north. The culvert consists of a single corrugated metal tube.

History of the Resource

Provide information on previous owners, land use, construction and alteration dates in a narrative format. This is required for all intensive level surveys and designation and recommended for other identification efforts.

This culvert may be one of two installed by refuge staff in 1968, as referred to in the annual narrative report.

Statement of Significance/Recommendation of Eligibility

Provide a detailed explanation of the property's eligibility for the National Register, including an evaluation under at least one of the four criteria, discussion of the seven aspects of integrity, and recommendations about eligibility. This is required for all properties.

The Route 405 Driggs River Road over Delta Creek Culvert (1) is recommended non-contributing to the Seney National Wildlife Refuge Historic District. It was installed after the period of significance.

References

List references used to research and evaluate the individual property.

Remensnyder, Katie, Sarah Reyes, and Ethan Epstein, *National Register of Historic Places Eligibility Evaluation for the Seney National Wildlife Refuge* (Dexter, MI: Commonwealth Heritage Group, Inc. 2021).



Figure 1. Route 405 Driggs River Road over Delta Creek Culvert (1), view to the south-southeast

Michigan SHPO Architectural Properties Identification Form



Rewritten to be in a more accessible format. All information is transcribed from the official document. The official document is available upon request.

Property Overview and Location

Street Address: Culverts (2) - Route 405 Driggs River Rd over Delta Creek

City/Township, State, Zip Code: Germfask, Michigan, 49883

County: Schoolcraft

Assessor's Parcel #: None

Latitude/Longitude (to the 6th decimal point): Lat: 46.200994, Long: -86.006806

Ownership: Public-Federal

Property Type

Structure



Architectural Information

Construction Date: 1968

Eligibility

Component of a Historic District: Non-contributing to a district

Integrity – Does the property possess integrity in all or some of the 7 aspects? Location (yes); Design (yes); Materials (yes); Workmanship (yes); Setting (yes); Feeling (yes), Association (yes)

Area(s) of Significances: Nothing listed.

Period(s) of Significance: Nothing listed.

General Integrity: Intact

Historic Name: Nothing Listed.

Current/Common Name: Culverts (2) - Route 405 Driggs River Rd over Delta Creek

Historic/Original Owner: Nothing Listed.

Historic Building Use: Landscape/Conservation Area

Current Building Use: Landscape/Conservation Area

Architecture/Engineer/Designer: Nothing Listed

Builder/Contractor: Refuge Staff

Survey Date: November 3, 2023

Recorded by S. Reyes

Narrative Architectural Description

Provide a detailed description of the property, including all character defining features and any accessory resources.

These two culverts run under Route 405 Driggs River Road and carry Delta Creek. Another culvert is a short distance to the south. These culverts consist of a pair of corrugated metal tubes.

History of the Resource

Provide information on previous owners, land use, construction and alteration dates in a narrative format. This is required for all intensive level surveys and designation and recommended for other identification efforts.

These culverts may be two of those installed by refuge staff in 1968, as referred to in the annual narrative report.

Statement of Significance/Recommendation of Eligibility

Provide a detailed explanation of the property's eligibility for the National Register, including an evaluation under at least one of the four criteria, discussion of the seven aspects of integrity, and recommendations about eligibility. This is required for all properties.

The Route 405 Driggs River Road over Delta Creek Culverts (2) are recommended non-contributing to the Seney National Wildlife Refuge Historic District. They were installed after the period of significance.

References

List references used to research and evaluate the individual property.

Remensnyder, Katie, Sarah Reyes, and Ethan Epstein, National Register of Historic Places Eligibility Evaluation for the Seney National Wildlife Refuge (Dexter, MI: Commonwealth Heritage Group, Inc. 2021).

Michigan SHPO Architectural Properties Identification Form



Rewritten to be in a more accessible format. All information is transcribed from the official document. The official document is available upon request.

Property Overview and Location

Street Address: Water Control Structure - Delta Creek Pool to Delta Creek

City/Township, State, Zip Code: Germfask, Michigan, 49883

County: Schoolcraft

Assessor's Parcel #: None

Latitude/Longitude (to the 6th decimal point): Lat: 46.205823, Long: -86.032542

Ownership: Public-Federal

Property Type

Structure



Architectural Information

Construction Date: 1960

Eligibility

Component of a Historic District: Contributing to a district

Integrity – Does the property possess integrity in all or some of the 7 aspects? Location (yes); Design (yes); Materials (yes); Workmanship (yes); Setting (yes); Feeling (yes), Association (yes)

Area(s) of Significances: Nothing listed.

Period(s) of Significance: Nothing listed.

General Integrity: Nothing Listed.

Historic Name: Nothing Listed.

Current/Common Name: Water Control Structure - Delta Creek Pool to Delta Creek

Historic/Original Owner: Nothing Listed.

Historic Building Use: Landscape/Conservation Area

Current Building Use: Landscape/Conservation Area

Architecture/Engineer/Designer: Nothing Listed

Builder/Contractor: Denison Construction Company

Survey Date: November 3, 2023

Recorded by S. Reyes

Narrative Architectural Description

Provide a detailed description of the property, including all character defining features and any accessory resources.

The Delta Creek Pool to Delta Creek water control structure is near the northern end of Delta Creek Pool on the Delta Creek Pool Dam. It regulates the outflow from Delta Creek Pool to Delta Creek. The east side of the water control structure consists of a three-sided concrete structure with concrete wing walls; the western side is open and has slots for inserting wood stoplogs. The structure channels water from Delta Creek Pool into a steel culvert that passes under the road and exits into Delta Creek. Steel wing walls flank the culvert on this side.

History of the Resource

Provide information on previous owners, land use, construction and alteration dates in a narrative format. This is required for all intensive level surveys and designation and recommended for other identification efforts.

The Denison Construction Company built this water control structure in 1960. No changes appear to have been made since it was constructed.

Statement of Significance/Recommendation of Eligibility

Provide a detailed explanation of the property's eligibility for the National Register, including an evaluation under at least one of the four criteria, discussion of the seven aspects of integrity, and recommendations about eligibility. This is required for all properties.

The Delta Creek Pool to Delta Creek water control structure is recommended contributing to the Seney National Wildlife Refuge Historic District. It retains much of its integrity and reflects the development of the refuge in the 1950s-1960s.

References

List references used to research and evaluate the individual property.

Remensnyder, Katie, Sarah Reyes, and Ethan Epstein, *National Register of Historic Places Eligibility Evaluation for the Seney National Wildlife Refuge* (Dexter, MI: Commonwealth Heritage Group, Inc. 2021).



Figure 1. Delta Creek Pool to Delta Creek water control structure, view to the north



Figure 2. Delta Creek Pool to Delta Creek water control structure, view to the northeast