



**CONESTOGA-ROVERS
& ASSOCIATES**

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www.CRAworld.com

April 10, 2015

Reference No. 058502

Ms. Liz Theile
Michigan Department of Environmental Quality
Water Resources Division
401 Ketchum Street, Suite B
Bay City 48708

Dear Ms. Theile:

Re: Joint Permit Application – File No. 15-73-0003-P
EPA ID #MID 041 793 340
RACER Saginaw Nodular Iron Industrial Land - Saginaw, Michigan

Conestoga-Rovers & Associates (CRA) on behalf of Revitalizing Auto Communities Environmental Response (RACER) has prepared the following responses to the Michigan Department of Environmental Quality (MDEQ) comments received on March 17, 2015 on the Joint Permit Application (File No. 15-73-0003-P) for the work proposed in the North Ditch at RACER's Nodular Industrial Land (Site) in Saginaw, Michigan. The following Attachments are included as part of CRA's responses.

Attachment A – MDEQ letter dated March 12, 2015
Attachment B – Cut and Fill Volume Calculations
Attachment C – Cross-Sections of the North Ditch

For ease of review, MDEQ's comments, which are included for reference in Attachment A, are provided in italics, followed by CRA's response.

MDEQ Comment No.1

The vertical datum listed in the permit application in Section 10 is NAVD88. The vertical datum listed in the permit application in Section 13 is NGVD29. Drawing "Dwg1" states that the vertical datum is NGVD29/AMSL. Other plans drawings do not have a vertical datum listed. Only one vertical datum should be used throughout the submittal. Clarify the vertical datum used and provide conversions from any other datum when necessary. Include calculations and references.



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CRA Response No.1

Vertical datum NGVD29 was used in all the plans that were prepared. The vertical datum that was checked in Section 10 (NAVD88) of the permit was inadvertently selected and should have been checked as NGVD29.

MDEQ Comment No. 2

The OHWM in drawing "Dwg1" is 585.64 ft AMSL. The OHWM in Section 10 of the permit application is 584.68 ft. NAVD88. Clarify the discrepancy and, if necessary, provide conversions with calculations and references.

CRA Response No. 2

The water elevation included in Section 10 of the permit was not the Observed High Water Mark (OHWM); it was a water level that had been measured on a specific date. Please note that the vertical datum in Section 10 was inadvertently checked as NAVD88, and should be checked as NGVD29. The OHWM (or the Design High Water Mark [DHWM] for the proposed work) is 585.64 ft AMSL (NGVD29).

MDEQ Comment No.3

Provide calculations for determining both fill and cut volumes. Your application referenced a computer program. If no hand calculations were performed, provide access to the computer program so that volumes can be verified.

CRA Response No.3

Attachment B presents the hand calculations of the cut and fill volumes above the DHWM (585.64 ft AMSL – NGVD29) and below the 100-year floodplain level (589.3 ft AMSL – NGVD29). Attachment C presents the cross-sections used for the cut and fill volume calculations.



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MDEQ Comment No. 4

Submit letters of authorization from property owners.

CRA Response No. 4

We are in the process of obtaining the letters of authorization from the adjacent property owners and will forward them to you once we receive them.

MDEQ Comment No.5

The property tax ID and project address do not correspond with the map location provided as the project location. Please verify the address and tax ID.

CRA Response No.5

The correct property tax ID and address are:

Tax ID: 21 4333 00500

Address: 2350 Veterans Memorial Parkway, Saginaw, MI

MDEQ Comment No. 6

(Optional) Provide a letter or statement from the local unit of government acknowledging your proposed application. (Sample wording "{City/Township} is aware of the proposed project within the floodplain to {project description} on a parcel of land at ____ and owned by _____. This letter does not represent an approval from our office at this time.")

CRA Response No. 6

A floodplain permit from the City of Saginaw is being obtained and will be provided to the MDEQ upon receipt.



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Should you have any questions on the information provided or require additional information, please do not hesitate to contact myself.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

John-eric Pardys

JP/kf/3

Encl.

cc: Dave Favero, RACER
Michael Tomka, CRA

Attachment A

MDEQ letter dated March 12, 2015



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SAGINAW BAY DISTRICT OFFICE



DAN WYANT
DIRECTOR

March 12, 2015

RACER Properties
c/o Dave Favero
500 Woodward Avenue, Suite 1500
Detroit, MI 48226

File Number: 15-73-0003-P
County: Saginaw
Project Name: RACER Properties

Dear Mr. Dave Favero:

SUBJECT: CORRECTION REQUEST

The Michigan Department of Environmental Quality's (MDEQ), Water Resources Division (WRD), has received and reviewed your application for a permit. Based on that review, the application has been determined to be incomplete as received and cannot be further processed until the item(s) listed below (has/have) been submitted.

The vertical datum listed in the permit application in Section 10 is NAVD88. The vertical datum listed in the permit application in Section 13 is NGVD29. Drawing "Dwg1" states that the vertical datum is NGVD29/AMSL. Other plans drawings do not have a vertical datum listed. Only one vertical datum should be used throughout the submittal. Clarify the vertical datum used and provide conversions from any other datum when necessary. Include calculations and references.

The OHWM in drawing "Dwg1" is 585.64 ft AMSL. The OHWM in Section 10 of the permit application is 584.68 ft. NAVD88. Clarify the discrepancy and, if necessary, provide conversions with calculations and references.

Provide calculations for determining both fill and cut volumes. Your application referenced a computer program. If no hand calculations were performed, provide access to the computer program so that volumes can be verified.

Fill volumes for the purpose of compensating cut for fill must include all lost storage above the existing ground (or above the normal high water mark of a waterbody or wetland) and below the 100-year flood elevation. Cut volumes for the purpose of compensating cut for fill should include all cuts made below the existing ground, above the normal high water mark of a proposed waterbody or wetland, and below the 100-year flood elevation. Compensating cuts should be made at the same location and elevation as the fill was placed.

Submit letters of authorization from property owners.

The property tax ID and project address do not correspond with the map location provided as the project location. Please verify the address and tax Id.

(Optional) Provide a letter or statement from the local unit of government acknowledging your proposed application. (Sample wording "{City/Township} is aware of the proposed project within the floodplain to {project description} on a parcel of land at ____ and owned by ____." This letter does not represent an approval from our office at this time.")

Additional information and/or filing fees may be required upon further review of your application. Should we not receive the requested information from you within 30 days of this letter, we will consider your application as withdrawn, and we will close your file. Fees are not refundable on files once a decision has been made or if an action has been taken, such as closing a file due to no or incomplete response to a correction request letter, posting a public notice, or conducting a site visit. A new application may be submitted, but fees are not transferable.

If you have any questions regarding this letter or your application, please contact me at 989-894-6224 or Theilee1@michigan.gov. Send the requested information to: MDEQ, WRD, Saginaw Bay District Office, 401 Ketchum Street, Suite B, Bay City, Michigan 48708-5430. Please include your file number 15-73-0003-P, in your response. The status of your file can be tracked online at: <http://www.deq.state.mi.us/ciwps>.

Sincerely,

 3/12/15

Elizabeth Theile
Water Resources Division

cc: Mr. John-eric Pardys, Conestoga-Rovers & Associates, Inc. 

Attachment B

Cut and Fill Volume Calculations

**CUT/FILL CALCULATIONS FOR THE NORTH DITCH
SAGINAW NODULAR INDUSTRIAL LAND
SAGINAW, MI**

A.) From South end of North Ditch to 7+80, fill above the 100-year floodplain and above the DHWM

	Most Southerly									
Cross-Section Station	End of North Ditch	STA 0+81.8	STA 1+50	STA 2+80	STA 4+00	STA 4+30	STA 6+00	STA 6+90	STA 7+80	Total Volume
Area of fill below the 100-year floodplain and above the DHWM (square feet)	0	1.3	5.0	0.5	0.8	1.2	3.6	9.7	13.5	
Distance to Next Cross Section Location (feet)	69.8	68.5	130	120	30	170	90	90	140	
Volume of fill below the 100-year floodplain and above the DHWM (cubic yards)		1.7	7.9	13.2	2.8	1.1	15.2	22.2	38.6	102.7

B.) From 7+80 directly east, fill above 100-year floodplain and above DHWM

						Total
Cross-Section Station	STA 7+80	STA 8+75	STA 9+54	STA 1	STA 2	Volume
Area of fill below the 100-year floodplain and above the DHWM (square feet)	13.5	8.9	1.3	53.5	59.7	
Distance to Next Cross Section Location (feet)	95	79	64	40		
Volume of fill below the 100-year floodplain and above the DHWM (cubic yards)		39.3	14.9	64.9	83.9	203.0

C.) From 8+75 to east end of North Ditch, cut and fill above 100-year floodplain and above DHWM

										Most Easterly	
Cross-Section Station	STA 8+75	STA 9+20	STA 9+80	STA 10+20	STA 10+80	STA 11+00	STA 11+60	STA 11+85	STA 12+30	End of North Ditch	Total Volume
Area of fill below the 100-year floodplain and above the DHWM (square feet)	8.9	10.0	78.6	5.3	19.1	16.4	11.5	9.6	10.9	0.0	
Area of cut below the 100-year floodplain and above the DHWM (square feet)		30.8	127.1	7.9	0.0	6.9	47.9	70.0	9.0		
Distance to Next Cross Section Location (feet)	45	60	35	65	20	60	25	45	48.4		
Volume of fill below the 100-year floodplain and above the DHWM (cubic yards)		(1)	(1)	(1)	29.4	13.1	31.0	9.8	17.1	9.8	110.3
Volume of cut below the 100-year floodplain and above the DHWM (cubic yards)		25.6	175.4	87.5	9.5	2.5	60.8	54.6	65.9		481.9

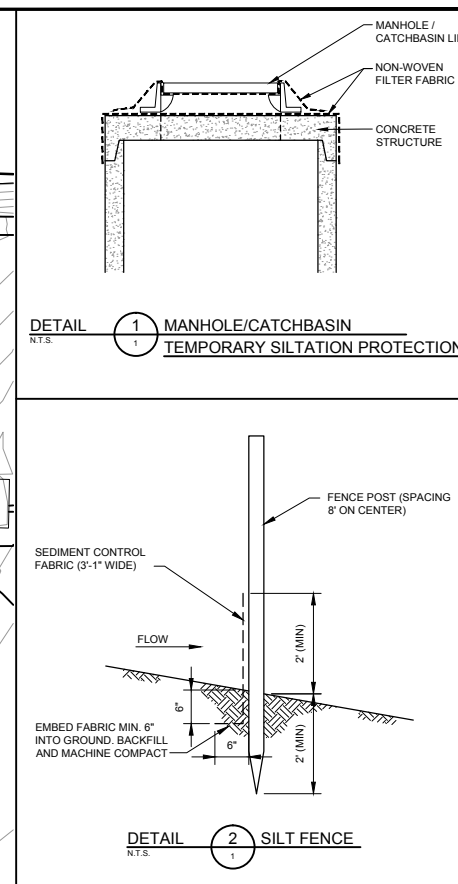
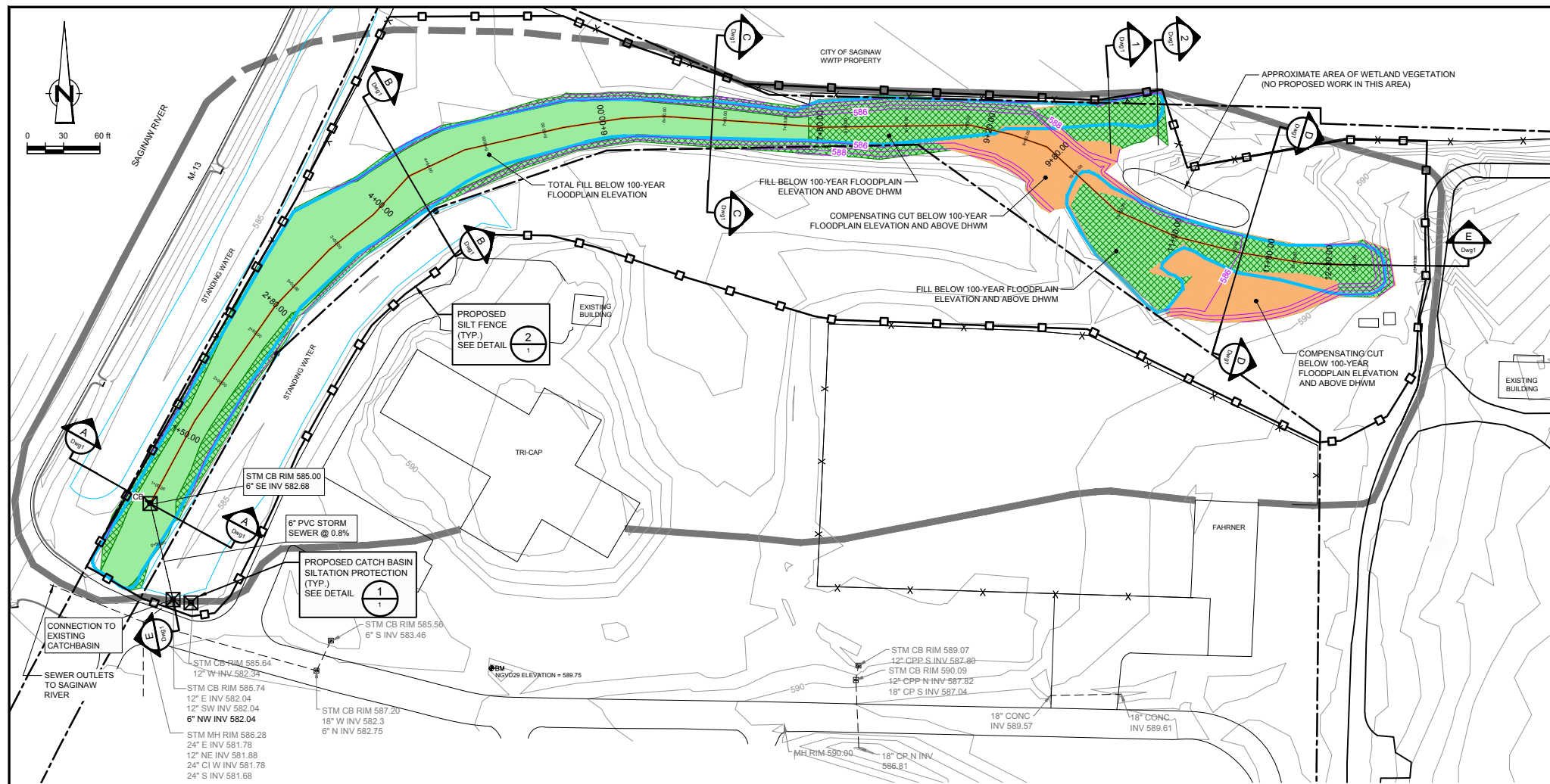
Total Volume of Fill 416.0 c.y.
Total Volume of Cut 481.9 c.y.

Notes:

(1) Volume for fill previously calculated in (B)

Attachment C

Cross-Sections of the North Ditch



NO	Revision	Date	Initial

- LEGEND**
- EXISTING GROUND CONTOUR
 - EXISTING DITCH
 - RACER PROPERTY BOUNDARY
 - FENCE
 - APPROXIMATE CATCHMENT BOUNDARY
 - EXISTING STORM SEWER
 - CENTER LINE OF PROPOSED SWALE
 - PROPOSED SWALE CONTOUR
 - PROPOSED CATCH BASIN
 - EXISTING CATCHBASIN
 - 100-YEAR FLOODPLAIN
 - ELEVATION - 589.3 FT AMSL (NGVD29)
 - DESIGN HIGH WATER MARK (DHWM) ELEVATION - 585.64 FT AMSL
 - TOTAL FILL BELOW 100-YEAR FLOODPLAIN ELEVATION
 - FILL BELOW 100-YEAR FLOODPLAIN ELEVATION AND ABOVE DHWM
 - COMPENSATING CUT BELOW 100-YEAR FLOODPLAIN ELEVATION AND ABOVE DHWM
 - CATCHBASIN/MANHOLE SILTATION PROTECTION
 - PROPOSED SILT FENCE

- SEDIMENT AND EROSION CONTROL NOTES:**
- THE SELECTED CONTRACTOR WILL OBTAIN A SOIL EROSION AND SEDIMENTATION CONTROL (SESC) PERMIT THROUGH THE COUNTY OF SAGINAW AND COMPLETE THE WORK IN ACCORDANCE WITH THE SESC PERMIT. THE SESC MEASURES INCLUDED ON THIS DRAWING ARE EXPECTED TO MEET THE REQUIREMENTS OF THE COUNTY OF SAGINAW, HOWEVER, THE SPECIFIC DETAILS WILL BE INCLUDED IN THE PERMIT.
 - SESC MEASURES WILL BE INSTALLED PRIOR TO COMMENCEMENT OF CONSTRUCTION.
 - SESC MEASURES WILL BE INSPECTED AND MAINTAINED THROUGHOUT THE DURATION OF THE CONSTRUCTION ACTIVITIES AND UNTIL THE SITE IS FULLY STABILIZED.
 - DISCHARGE OF WATER FROM THE NORTH DITCH WILL BE CONDUCTED IN ACCORDANCE WITH THE NPDES PERMIT (M00059042) FOR THE SITE.
 - A FLOATING PUMP INTAKE, FILTER SAC, OR AN APPROVED EQUIVALENT WILL BE USED TO LIMIT THE AMOUNT OF SEDIMENT IN DISCHARGES FROM THE NORTH DITCH.

NOTE: BENCHMARK (BM): ARROW ON HYDRANT SOUTH OF TRI-CAP BUILDING ALONG ASPHALT DRIVE NGVD29 ELEVATION = 589.75.

PARAMETER	UNIT	QUANTITY
LENGTH OF EXISTING DITCH	FEET	1315
MAXIMUM WIDTH OF EXISTING DITCH	FEET	62
TOTAL VOLUME OF FILL TO BE PLACED	CUBIC YARDS	3826
TOTAL VOLUME OF FILL ABOVE DHWM	CUBIC YARDS	473
COMPENSATING CUT VOLUME	CUBIC YARDS	574
NET RESULT (CUT ABOVE DHWM)	CUBIC YARDS	101

SCALE VERIFICATION

THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

Approved

DRAWING STATUS

Status	Date	Initial

REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL RESPONSE (RACER)

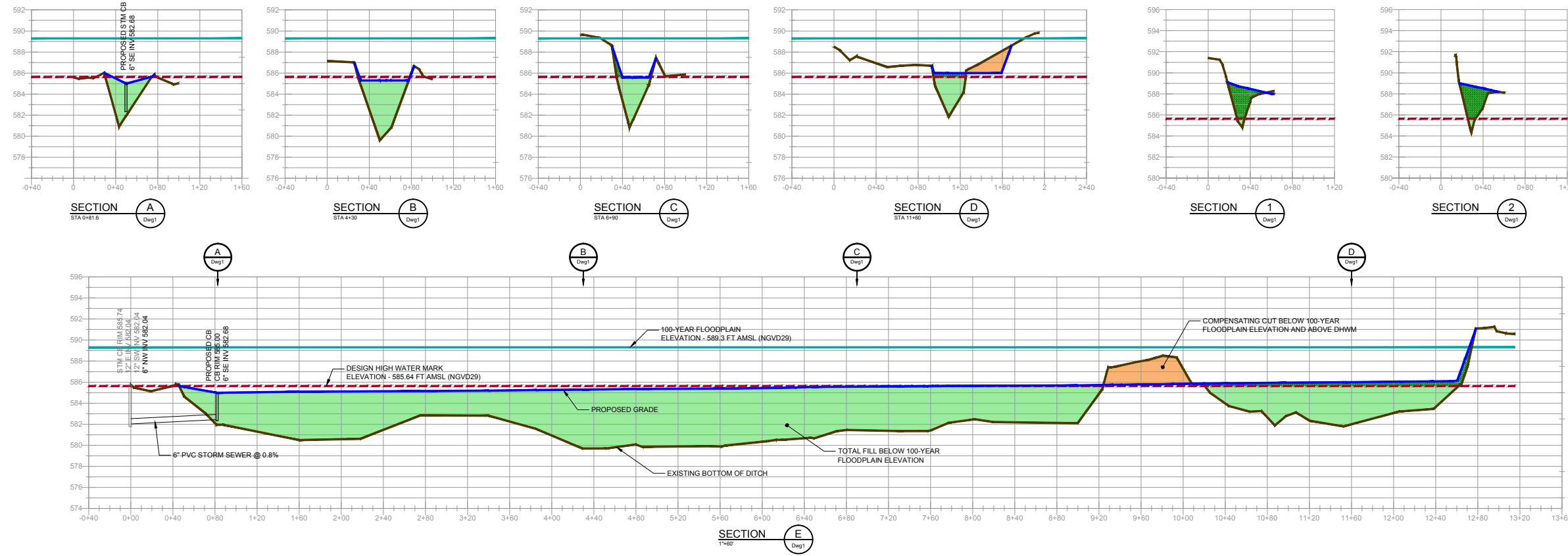
SAGINAW, MICHIGAN

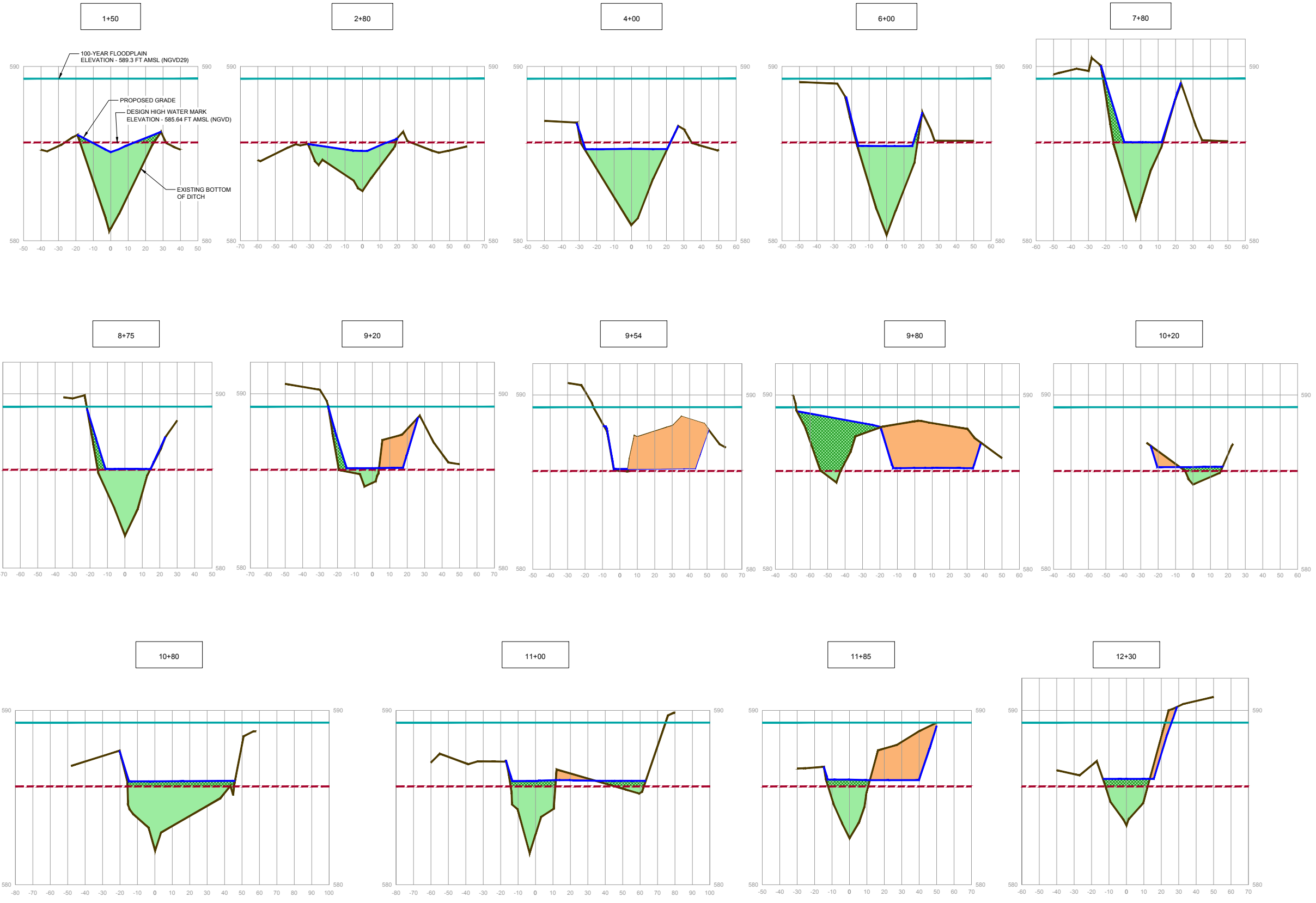
NORTH DITCH PLAN AND PROFILE



Source Reference: 58502-00(C3D-MEMO005)GN-WA003

Project Manager: M.TOMKA	Reviewed By: J.PARDYS	Date: FEBRUARY 2015
Scale: HORZ 1"=60' VERT 1"=6' (10X VERT EX)	Project N°: 58502-T02	Report N°: MEMO012 Drawing N°: Dwg1





NO	Revision	Date	Initial

- LEGEND**
- 100-YEAR FLOODPLAIN ELEVATION - 589.3 FT AMSL (NGVD29)
 - DESIGN HIGH WATER MARK (DHWM) ELEVATION - 585.64 FT AMSL (NGVD)
 - PROPOSED GRADE
 - EXISTING BOTTOM OF DITCH
 - TOTAL FILL BELOW 100-YEAR FLOODPLAIN ELEVATION
 - FILL BELOW 100-YEAR FLOODPLAIN ELEVATION AND ABOVE DHWM
 - COMPENSATING CUT BELOW 100-YEAR FLOODPLAIN ELEVATION AND ABOVE DHWM

SCALE VERIFICATION
 THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

Approved

DRAWING STATUS

Status	Date	Initial

REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL RESPONSE (RACER)
 SAGINAW, MICHIGAN
 NORTH DITCH SECTIONS

CRA CONESTOGA-ROVERS & ASSOCIATES

Source Reference: 58502-00(C3D-MEMO005)GN-WA003

Project Manager: M.TOMKA	Reviewed By: J.PARDYS	Date: DECEMBER 2014
Scale: HORZ 1"=30' VERT 1"=3' (10X VERT EX)	Project N°: 58502-T02	Report N°: MEMO012 Drawing N°: Dwg2