



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
FINANCE DIVISION



PHILLIP D. ROOS
DIRECTOR

April 2, 2025

TO: All Interested Citizens, Organizations, and Government Agencies

SUBJECT: FINDING OF NO SIGNIFICANT IMPACT
**Project Owner: Great Lakes Water Authority, Wayne County
on behalf of Detroit Water and Sewerage Department
Project Name: City of Detroit Sewer Rehabilitation/Replacement Project
Clean Water State Revolving Fund Project Number 6002-01**

The purpose of this notice is to seek public input and comment on a preliminary decision by the Michigan Department of Environment, Great Lakes, and Energy (EGLE) that an Environmental Impact Statement (EIS) is not required to implement recommendations discussed in the attached Environmental Assessment of a wastewater project planning document submitted by the applicant mentioned above.

HOW WERE ENVIRONMENTAL ISSUES CONSIDERED?

Part 53, Clean Water Assistance, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, being Sections 324.5301 to 324.5316 of the Michigan Compiled Laws Annotated, requires EGLE to evaluate all environmental implications of a proposed wastewater project. EGLE has done this by incorporating a detailed analysis of the environmental effects of the proposed alternatives in its review and approval process. A project planning document containing information on environmental impacts was prepared by the municipality and reviewed by the State. EGLE has prepared the attached Environmental Assessment and found that the proposed project does not require the preparation of an EIS.

WHY IS AN EIS NOT REQUIRED?

Our environmental review concluded that no significant environmental impacts would result from the proposed action. Any adverse impacts have either been eliminated by changes in the project planning document or will be reduced by the implementation of the mitigative measures discussed in the attached Environmental Assessment.

HOW DO I GET MORE INFORMATION?

A map depicting the location of the proposed project is attached. This information is also available on our website at Michigan.gov/SRF under "Environmental Project Reviews." The Environmental Assessment presents additional information on the project, alternatives that were considered, impacts of the proposed action, and the basis for our decision. Further information can be obtained by calling or writing one of the contact people listed below.

HOW DO I SUBMIT COMMENTS?

Any comments supporting or disagreeing with this preliminary decision should be submitted via email to EGLE-WIFFS@Michigan.gov or to me at EGLE, FD, Constitution Hall, P.O. Box 30457, Lansing, Michigan 48909-7957. We will not take any action on this project planning document for 30 calendar days from the date of this notice in order to receive and consider all comments.

WHAT HAPPENS NEXT?

In the absence of substantive comments during this period, our preliminary decision will become final. The applicant will then be eligible to receive loan assistance from this Agency to construct the proposed project.

Any information you feel should be considered by EGLE should be brought to our attention. If you have any questions, please contact Jonathan M. Berman, the project manager, at 517-897-3634; BermanJ@Michigan.gov; or you may contact me. Your interest in this process and the environment is appreciated.

Sincerely,

Dan Beauchamp

Dan Beauchamp, Section Manager
Water Infrastructure Funding and Financing Section
Finance Division
517-388-3380

Attachment

DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
Clean Water State Revolving Fund
Detroit Water and Sewerage Department, Wayne County
City of Detroit Sewer Pipe Rehabilitation and Manhole Rehabilitation/Replacement
Environmental Assessment
April 2025

PROJECT IDENTIFICATION

Applicant: Great Lakes Water Authority, Wayne County
on behalf of Detroit Water and Sewerage Department

Address: 735 Randolph
Detroit, Michigan 48226

Authorized Representatives: Suzanne Coffey, CEO and Nicolette Bateson, CFO

Project Number: 6002-01

PROJECT BACKGROUND

The City of Detroit (Detroit), situated in the northeast portion of Wayne County, is 88,876 acres in size. The estimated residential population of Detroit is 633,218 as of May 2024. Projections anticipate the population will remain stagnant overall with 632,328 in the year 2050.

Detroit owns its combined sanitary/storm sewer collection system with the operations and maintenance carried out through the Detroit Water and Sewerage Department (DWSD) while the wastewater flows are sent to the Great Lakes Water Authority's (GLWA) Water Resource Recovery Facility treatment plant in southwest Detroit. The GLWA is applying for Clean Water State Revolving Fund (CWSRF) loan assistance, from the Michigan Department of Environment, Great Lakes, and Energy (EGLE), on behalf of the DWSD, for the rehabilitation and replacement of aging, critical, and structurally deficient sewer pipes and manholes in Detroit (see Figures 1-5).

The estimated total project cost is \$9,372,000. Note the total cost estimate declined from \$17,080,000 due to anticipated lower bid amounts and the DWSD's removal of pipe segments determined by EGLE to be CWSRF ineligible for structural integrity along with pipe segments for which DWSD had determined there is insufficient time remaining to design for a successful fiscal year 2025 CWSRF loan.

Since DWSD qualified as a significantly overburdened community as determined by EGLE, the project has been allocated principal loan forgiveness up to 20 percent of the CWSRF eligible project loan costs which is currently estimated at \$1,874,400.

To service the CWSRF loan debt, the typical residential customer of the DWSD sewer collection system is expected to see a rate increase of up to \$8.34 per year for the project. However, final user cost impact may be lower due to the available principal loan forgiveness reducing the CWSRF loan debt to service, in addition to the recent reduction in the total scope of work and project cost estimate. Construction of the project is anticipated to begin by spring 2026 and conclude by summer 2028.

PROPOSED PROJECT

A. Project Need/Justification

The DWSD sewer collection system is comprised of approximately 2,819 miles of pipe with an average age of 95 years and to date nearly 85 percent have not been rehabilitated or replaced. Cementitious material represents the largest portion of inventory. The number of reported sinkholes and cave-ins related to defects in the DWSD sewer system has averaged around 200 per year over the last five years. The structural condition of the DWSD system requires rehabilitation to prevent future sewer collapses and related adverse impacts to public health and water quality as well as costly emergency repairs and property damages.

DWSD evaluated 29 miles of pipe and manholes in the project's neighborhoods. The structural integrity of pipes and manholes were evaluated via the National Association of Sewer Service Companies (NASSCO) Pipe Assessment Certification Program (PACP) and Manhole Assessment Certification Program (MACP). Sewer condition grade ratings of either a 4-significant (poor) defect, or a 5-most significant (immediate attention) grade, was identified for 86 sewer pipe segments and 65 sewer manholes which are both included in the scope of work for this project.

In addition, DWSD provided additional documentation for pipes with a high consequence of failure and/or high criticality to meet CWSRF eligibility. As a result, the total project consists of 93 sewer pipe segments and 65 sewer manholes.

B. Alternatives Considered

No-action Alternative

No action is not a feasible alternative since the identified structural integrity problems in the DWSD system must be addressed to prevent future sewer collapses and related adverse impacts to public health and water quality as well as costly emergency repairs and property damages. As a result, the no action alternative was rejected.

Regional Alternative

The identified structural integrity problems in the DWSD system cannot be regionalized. As a result, a regional alternative was not considered.

Principal Alternative 1: Pipe Rehabilitation and Manhole Rehabilitation/Replacement

The identified structural integrity problems in the DWSD system can be addressed by a combination of sewer pipe rehabilitation and sewer manhole rehabilitation/replacement. The pipe rehabilitation consists of external point repairs, trenchless pipe repairs, and lining, including cured-in-place-pipe (CIPP) lining, for approximately 32,600 linear feet of sewers ranging in size up to 75-inch diameter. An estimated 40 manholes will be replaced while the other 25 identified manholes will be rehabilitated with general and spot repairs, benching and channel reconstruction of the manhole bottoms, and/or structural spray linings. 'Principal Alternative 1' was considered further.

Principal Alternative 2: Pipe and Manhole Replacement Only

Identified structural integrity problems in the DWSD system can also be addressed by only full-length sewer pipe segment replacements and sewer manhole replacements. The approximately 32,600 linear feet of sewers ranging in size up to 75-inch diameter

would be replaced in full, from manhole to manhole, and all 65 manholes would be replaced. 'Principal Alternative 2' was considered further.

Monetary Evaluation

A monetary evaluation comparing the two principal alternatives was done through a present worth or cost-effectiveness analysis. The result demonstrated that Principal Alternative 1 is a much better value because it was appraised at less than one-half of Principal Alternative 2's total life cycle cost. Thus, 'Principal Alternative 1: Pipe Rehabilitation and Manhole Rehabilitation/Replacement' is the selected alternative.

C. Selected Alternative

The selective alternative of pipe rehabilitation and manhole rehabilitation/replacement in Detroit consists of the following items:

- External point repairs for 600 linear feet of sewer pipes up to 24-inch diameter
- Lining of 32,000 linear feet of sewer pipes up to 75-inch diameter
- Replacement of 40 sewer manholes
- Repairs to 25 sewer manholes
- Restoration of the surface areas and existing structures after construction

D. Project Cost and Implementation

The total estimated project cost is \$9,372,000. This includes up to 20 percent in loan principal forgiveness (estimated at \$1,874,400). The GLWA anticipates financing the project with a 30-year CWSRF loan at 1.0 percent interest due to the DWSD qualifying as a significantly overburdened applicant. The average residential user served by the DWSD system is expected to see a user rate increase of no greater than approximately \$8.34 per year due to implementing the project.

PROJECT IMPACTS

A. Water Quality Impacts

The project has no anticipated adverse impacts to state regulated water resources of floodplains, streams, or wetlands; therefore, a joint permit application will not be necessary. The project will improve structural integrity of the DWSD system, preventing future sewer collapses and related adverse impacts to public health and water quality. The project is not expected to require any significant dewatering.

B. Construction Impacts

Construction of the project will only take place within extensively urbanized areas in Detroit and be confined to previously disturbed areas. Most of the work will occur within the existing public rights-of way where multiple utilities and infrastructure already exist. Much of the project will extensively utilize trenchless technologies, minimizing the extent of above ground direct impacts and disruption to residents and businesses.

There will be temporary DWSD system service disruptions for CIPP linings since the liner must be entirely sealed and pressed against the host pipe, blocking connections. CIPP lining is a time sensitive activity since the lining resin used can expire once batched. DWSD service disruption will be mitigated in three ways: 1) Door hangers will be placed on doorknobs to provide public notice to customers about a week before any CIPP lining will cause disruption in service; 2) CIPP linings will take place during normal

business hours while most customers are typically out at work; 3) Once a CIPP lining begins, the contractor will not be allowed to leave the site without reopening services.

Construction activities are not expected to have any adverse effect on archaeological, historical, or cultural resources since the work will primarily occur underground involving existing sewer infrastructure with minimal above ground disruption due to utilizing trenchless technologies. The project will cause no loss of high-quality habitat for the federally threatened Eastern massasauga rattlesnake (EMR) while no erosion control blankets containing plastic mesh netting or similar material will be used that could entangle the EMR. The work is not anticipated to require removal of any mature trees. There will be no tree cutting, trimming, or removal of potential roost trees of the federally endangered Indiana bat from June 1 to July 31 (the non-volant, or pup, season). Adverse impacts to state designated threatened or endangered species are unlikely since documented occurrences are historic and/or far removed from project areas.

Anticipated temporary construction disturbances, such as noise, dust, soil erosion, and street traffic disruption will occur and be mitigated by implementing techniques specified in the construction contract documents. Noise generated from construction equipment will be controlled by limiting available work hours. Dust and soil deposits on streets will be controlled through water spraying and construction area sweeping as necessary. The implementation of proper soil erosion and sediment control measures, under Part 91, Soil Erosion and Sedimentation Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as Amended, will mitigate the impact of spoils on surface water quality. Street congestion and disruption of vehicular movement may occur for short periods of time on the roads where work is actively being done. Aesthetics of the project areas will be temporarily affected until restoration of all work sites is complete.

C. Secondary Impacts

The DWSD system's service area population is expected to remain stagnant over the next 20 years. The project will not result in any increase in the DWSD system's capacity since the work is limited to pipe rehabilitation and manhole rehabilitation/replacement. As a result, there are no adverse secondary growth impacts expected from the project.

PUBLIC PARTICIPATION

The DWSD held a public meeting on February 21, 2024, to discuss the project. The meeting was publicly advertised on February 2, 2024, in the Detroit Legal News, on February 5, 2024, in the Detroit News, Detroit Free Press, and on the DWSD website, and on February 7, 2024, in the Michigan Chronicle. A presentation was given on the project. No comments were submitted. The DWSD Board passed a resolution in support of the project immediately after the meeting. The GLWA Board passed a resolution in support of project on April 24, 2024.

REASONS FOR CONCLUDING NO SIGNIFICANT IMPACTS

The project is anticipated to have no significant adverse impacts on socioeconomic, cultural, or environmental factors. Minor construction impacts will be temporary and mitigated with sound construction practices and adherence to permit requirements. The project will improve structural integrity in the DWSD system, preventing future sewer collapses and related adverse impacts to public health and water quality as well as costly emergency repairs and property damages.

Questions regarding this Environmental Assessment should be directed to:

Jonathan M. Berman, State Revolving Fund Compliance Specialist
Water Infrastructure Funding and Financing Section
Finance Division
Michigan Department of Environment, Great Lakes, and Energy
P.O. Box 30457
Lansing, Michigan 48909-7957
Telephone: 517-897-3634
Email: BermanJ@Michigan.gov

FIGURE 1

Sewer Pipe Rehabilitation and Manhole Rehabilitation/Replacement
Locations in the City of Detroit (zoomed out view)

CWSRF Project Number 6002-01

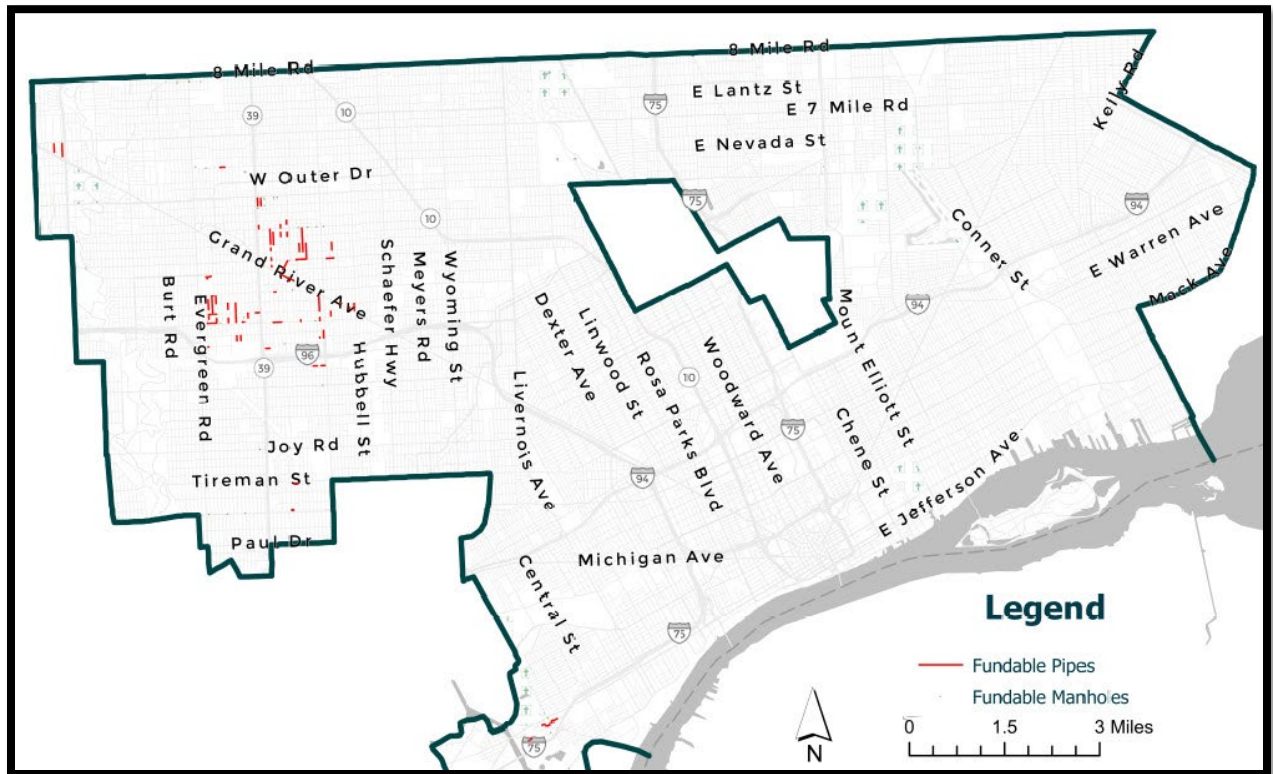


FIGURE 2

Sewer Pipe Rehabilitation and Manhole Rehabilitation/Replacement
District 1 Locations in the City of Detroit (zoomed in views)

Blue/Red Lines Indicate Pipe Repairs/Linings and Blue Rings Indicate Manhole Improvements

CWSRF Project Number 6002-01

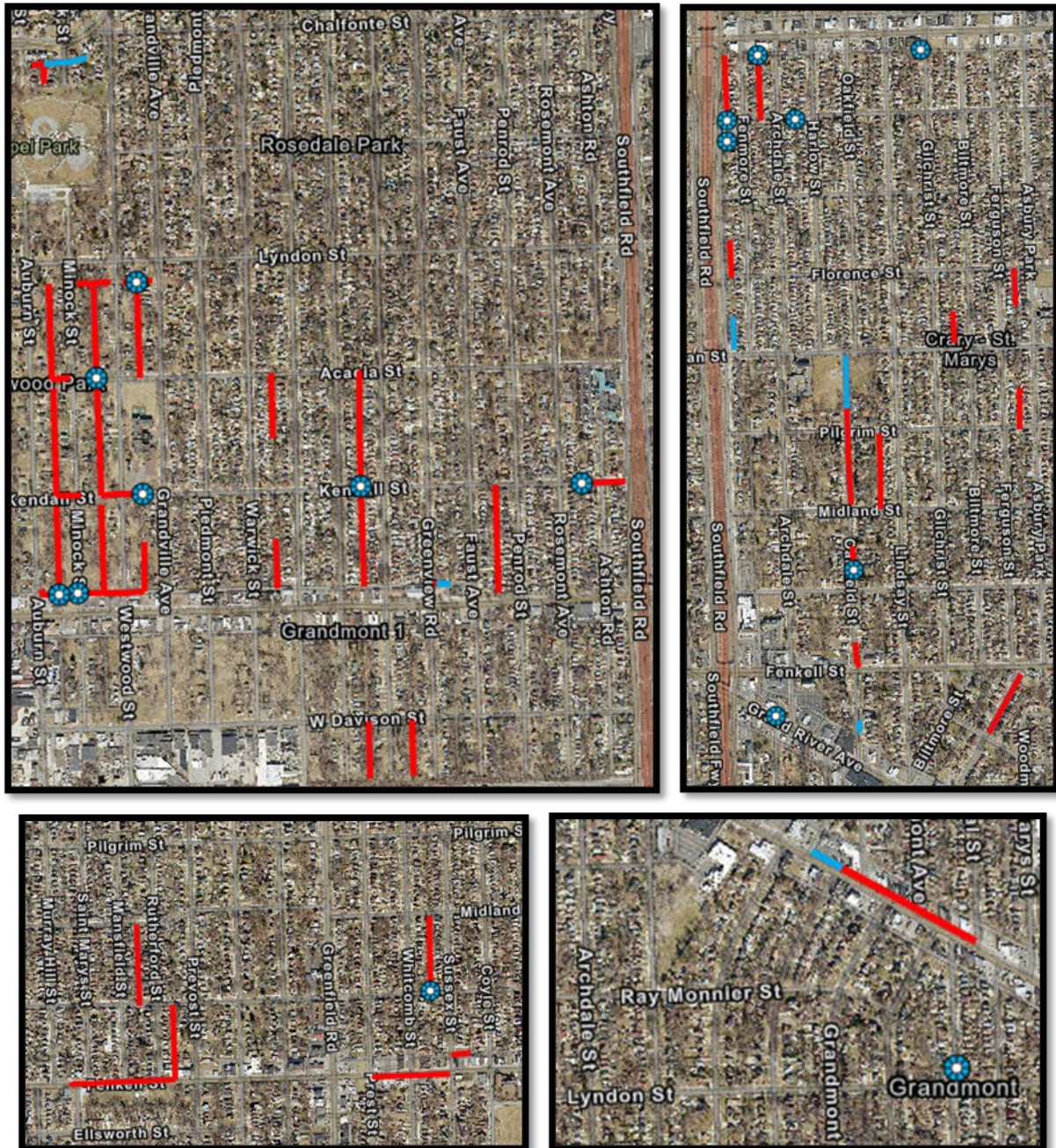


FIGURE 2 continued

Sewer Pipe Rehabilitation and Manhole Rehabilitation/Replacement
Additional District 1 Locations in the City of Detroit (zoomed in views)

Blue/Red Lines Indicate Pipe Repairs/Linings and Blue Rings Indicate Manhole Improvements

CWSRF Project Number 6002-01



FIGURE 3

Sewer Pipe Rehabilitation and Manhole Rehabilitation/Replacement
District 5 Location in the City of Detroit (zoomed in views)

Blue/Red Lines Indicate Pipe Repairs/Linings and Blue Rings Indicate Manhole Improvements

CWSRF Project Number 6002-01

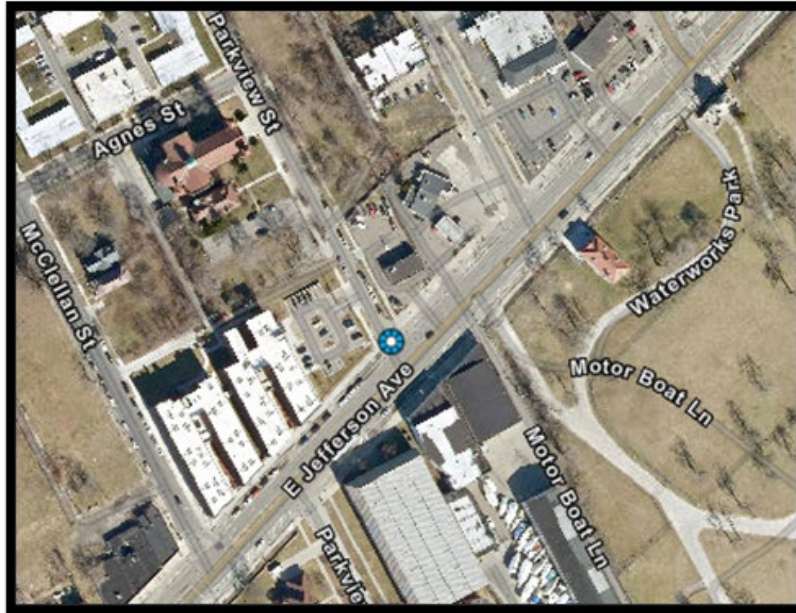


FIGURE 4

Sewer Pipe Rehabilitation and Manhole Rehabilitation/Replacement
District 6 Locations in the City of Detroit (zoomed in views)

Blue/Red Lines Indicate Pipe Repairs/Linings and Blue Rings Indicate Manhole Improvements

CWSRF Project Number 6002-01



FIGURE 5

Sewer Pipe Rehabilitation and Manhole Rehabilitation/Replacement
District 7 Locations in the City of Detroit (zoomed in views)

Blue/Red Lines Indicate Pipe Repairs/Linings and Blue Rings Indicate Manhole Improvements

CWSRF Project Number 6002-01

