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

GRETCHEN WHITMER
GOVERNOR

PHILLIP D. ROOS
DIRECTOR

April 24, 2024

TO: All Interested Citizens, Organizations, and Government Agencies

SUBJECT: FINDING OF NO SIGNIFICANT IMPACT
City of Marine City, St. Clair County
Water Distribution and Treatment System Improvements
Drinking Water State Revolving Fund Project Number 7852-01

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 water supply project planning document submitted by the applicant mentioned above.

HOW WERE ENVIRONMENTAL ISSUES CONSIDERED?

Part 54, Safe Drinking Water Assistance, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, being Sections 324.5401 to 324.5418 of the Michigan Compiled Laws Annotated, requires EGLE to evaluate all environmental implications of a proposed water supply project. EGLE has done this by incorporating a detailed analysis of the environmental impact of the proposed alternatives in its review and approval process. A project planning document was prepared by the applicant 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/DWSRF under “Additional Links.” 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 to me at EGLE, P.O. Box 30457, Lansing, Michigan 48909-4957. 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 any 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 Chelsea Walsh, the project manager, at 517-599-7218; WalshC3@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
Drinking Water State Revolving Fund
City of Marine City, St. Clair County
Environmental Assessment
April 2024

PROJECT IDENTIFICATION

Applicant:	City of Marine City
Address:	560 Sout Parker Street Marine City, Michigan 48039
Authorized Representative:	Scott Adkins, City Manager
Project Number:	7852-01

PROJECT BACKGROUND

The City of Marine City (Marine City) is located in St. Clair County. It is surrounded by China and East China Township to the north, the St. Clair River to the east, and the Township of Cottrellville to the southwest. (Figure 1) According to the Southeast Michigan Council of Governments data, Marine City's population was 4,079 in 2020 and is expected to remain relatively stable, with a projected population of 4,117 in 2040.

Marine City is applying for a Drinking Water State Revolving Fund (DWSRF) loan from the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to finance improvements to the drinking water treatment and distribution systems (Figure 2). The project includes water treatment plant (WTP), intake, and storage tower improvements, water main looping and replacement, and lead service line replacement (LSLR).

The estimated total project cost is $26,000,000. Marine City anticipates funding/financing the project with a combination of low interest loan, including a portion of principal forgiveness, and a grant. As an overburdened community determined by EGLE, Marine City qualified to receive an American Rescue Plan grant not to exceed 50 percent ($11,394,760) of the total water main looping and replacement and water treatment plant improvement costs. Bipartisan Infrastructure Law (BIL) loan ($1,670,760) and principal forgiveness ($1,605,240) is available for the LSLR work. The DWSRF loan would finance the remainder of the project cost, up to $11,329,240.

Repayment of the project financing will be from an increase in user rates. Rates are anticipated to increase from the current average user rate of $67.16 per month to an estimated rate of $78 per month, an increase of $10.84 per month.

PROPOSED PROJECT

A. Project Need/Justification

Marine City owns and operates its drinking water distribution and treatment system which serves approximately 4,079 customers. The water system is comprised of the WTP and a 750,000-gallon water storage tower. Installation of water system components began in 1925 while WTP construction was completed in 1936. The water storage tower was constructed in 1999. The drinking water system's intake pipe transports water from the St. Clair River to the WTP for distribution to Marine City. The WTP is a filtration plant that utilizes chlorination,

flocculation, sedimentation, and rapid sand filtration. The distribution system consists of approximately 28 miles of water main, ranging in diameter from one inch to 16 inches.

The proposed project includes water main looping and replacement to improve water reliability and quality to various areas. The LSLR is needed to improve the drinking water quality by removing potential lead contamination which can have negative impacts on human health. The removal of lead service lines is required by the Michigan Lead and Copper Rule (LCR).

An October 2022 EGLE sanitary survey identified various deficiencies at the WTP and resulted in the issuance of an Administrative Consent Order (ACO). WTP improvements associated with this project will address these deficiencies. Improvements include rehabilitation of various components, replacement of filter media, filters, piping, tubes, pumps and controls, and relocation, coating, or upgrades to WTP components. These improvements will help mitigate flood risk and improve water quality. In accordance with EGLE recommendations, a water storage tower mixing system, drainage inlet, and splash plate will be installed, and the zebra mussel control screening will be replaced on the intake pipe.

B. Alternatives Considered

No-action Alternative

No action is not a feasible alternative for addressing the immediate needs of the Marine City water treatment system. Without WTP, intake pipe, and storage tower improvements, the current system deficiencies would not be addressed as required by EGLE. Marine City's drinking water system would not be in compliance with the ACO requirements.

The no-action alternative is not an option for LSLR as it is required by Michigan's LCR. Without replacement, existing lead service lines would remain and continue to pose a risk to public health and safety, and Marine City would not achieve compliance with the LCR. Leaving aging water mains in place would result in continued water main breaks and water losses, requiring emergency repairs and decreasing the reliability of the drinking water distribution system. If looping of water mains did not take place, dead ends would continue to exist, posing water quality and reliability issues.

Regional Alternative

The Marine City WTP serves industrial, commercial, and residential users within the city limits. The WTP, water storage tower, intake pipe, and distribution system are owned by Marine City. Regionalization would involve connecting Marine City's water distribution system to another regional water utility such as the St. Clair River Sewer and Water Authority (SCRSWA) in East China Township. Regionalization would not address the need for water main replacement, looping, and LSLR.

A connection between SCRSWA currently exists, serving as an as-needed emergency water supply between Marine City and East China Township. The regional treatment alternative consists of two options. Marine City could purchase water from SCRSWA, or the two communities could combine water treatment and distribution systems to form a joint water department serving both communities. Additional costs would be incurred if either option was chosen as expansion and improvements would be required to provide water for both communities. In addition, if SCRSWA provided drinking water to Marine City, the Marine City WTP would be decommissioned, and both communities would lose the assurance of a backup water supply in the event of an emergency.

If consolidation and connection occurred, many of the proposed upgrades would still be necessary based on the age and condition of the existing distribution system. Additional infrastructure would also be needed to connect to the regional utility. Marine City residents could be subject to any future rate increases imposed by SCRSWA. As a result of this analysis, the alternative was not considered.

Optimization of Existing System

The Optimization alternative evaluates the existing waterworks system and whether it can function more efficiently with operational changes, additional equipment, or the addition and training of operating personnel.

Many of the WTP components are at the end of their useful life or in need of repairs and upgrades to meet compliance requirements. The LSLR, and water main looping and replacement cannot be achieved through optimization. Based on Marine City's review of the distribution system, water supply, and storage tank, it has been determined that optimization of the existing system will not meet the goals of the project.

Construction Alternative

Construction alternatives would include upgrades to the WTP building and components and improvements to the water storage tower and intake pipe. The removal of lead service lines and replacement of undersized and aging water mains and looping would also occur.

The 2022 EGLE sanitary survey identified various deficiencies at the WTP that require attention. This includes rehabilitation of the filter box and existing filters, coating of the backwash weir and finished water reservoir, replacement of filter media, piping, tubes and hoses, low lift pumps and controls, and reservoir hatches. A rapid mixer for the alum feed system will be installed. Various equipment will be replaced including floc mixers, chemical feed, flow meters, lab equipment, and turbidity meters. The supervisory control and data acquisition (SCADA) system will also be improved. The WTP roof has passed the end of its useful life, as roof leaks have affected the brick facade and interior. The source intake pipe screen in the St. Clair River would be replaced and a zebra mussel control program would be implemented as recommended by EGLE. A drainage inlet structure, splash plate, and mixing system would be installed at the storage tower.

An estimated 38,000 linear feet of water main will be replaced, including looping of 670 linear feet of water main. Areas with existing 2-inch diameter mains will be prioritized followed by other undersized segments which are past the end of their useful life and have a history of breaks. Marine City anticipates approximately 210 lead service lines will also be replaced as part of this project. While an estimated 106 will be replaced in conjunction with water main replacement, 104 lead service lines will be replaced at various addresses throughout Marine City. (Figure 3)

C. Selected Alternative

Marine City determined that construction of various water system improvements is the most appropriate alternative to address the different needs of the system. The various components of the WTP will be upgraded, rehabilitated, or replaced to address the deficiencies identified in the ACO and comply with EGLE requirements. This will provide increased reliability, monitoring, and performance.

The aging, undersized water mains and lead service lines will be replaced via open cut or directional drilling methods, depending on their location. An estimated 27,750 linear

feet of water main ranging in diameter from 2 to 6-inches will be replaced with 8-inch diameter water main at various locations throughout Marine City. In other areas, an estimated 10,150 linear feet of 6 to 12-inch diameter water main will be replaced with 12-inch mains. The majority of these mains were installed before 1949 and all have been identified as needing rehabilitation. Water main looping is anticipated to take place along Hill, Parker, and North Market Streets with 670 linear feet of water main constructed. There are at least 210 lead service lines that have been identified and will be replaced throughout Marine City as a result of this project.

D. Project Cost and Implementation

The estimated cost of the project is $26,000,000. The project funding/financing, along with the financing repayment through user rates is discussed on page 1. Construction is anticipated to begin in October 2024, and be completed by August 2026.

PROJECT IMPACTS

A. Water Quality Impacts

EGLE Water Resources Division (WRD) conducted a review of potential impacts at all of the proposed project locations. WRD determined there are no anticipated impacts to state regulated resources of floodplains, wetlands, inland lakes, and streams.

B. Construction Impacts

The State Historic Preservation Office (SHPO) determined the water main replacement and looping will have no adverse effect on historic properties within the area. The LSLR and water treatment plant, water storage tower, and intake pipe improvements are still under review and awaiting concurrence from SHPO with Marine City's qualified archaeology consultant's findings/recommendation that no historical properties will be affected. Construction cannot begin prior to the receipt of SHPOs clearance. LSLR is planned for both the David Lester House, a Michigan State Historic Site, and Marine City's City Hall, a National-Register listed site, as well as five properties within the North Main Street Historic District. The proposed LSLR is limited to previously disturbed areas and involves replacement of the pre-existing service lines. Therefore, adverse impacts affecting the historical significance of the properties are not anticipated. Exterior improvements at the National Register-listed Marine City WTP, including a new roof and tuckpointing of deteriorated brick work, are planned to match the original materials. Interior improvements are not anticipated to compromise the historic character of the building. Improvements to the water storage tower and intake pipe are not anticipated to affect any historic or culturally significant property. In the unlikely event that cultural or historical materials are encountered, SHPO and other appropriate authorities will be contacted immediately.

The U.S. Fish and Wildlife Service, Michigan Natural Features Inventory (MNFI), and Michigan Department of Natural Resources reviewed the project locations for potential impacts to endangered, threatened, and/or at-risk species. According to the MNFI review, federally listed mussel species may occur within the Belle River. However, adverse impacts are unlikely as construction such as in-stream work and land clearing will not take place within proximity of the Belle River. Marine City will take all appropriate measures as recommend by MNFI to ensure there are no adverse impacts to species listed in the Rare Species Review. If tree removal is necessary, it will occur between October 15 and May 31 to protect endangered or threatened bat species.

The majority of the improvements at the WTP and water storage tower will take place within the footprint of the existing facilities, therefore no environmental impacts are anticipated. There will likely be an increase in construction traffic at times which may affect neighborhoods and public spaces. Temporary water shut off may be required during LSLR and water main replacement and looping. Residents will be provided with 45 days' notice for LSLR. In addition, 24 to 48 hours' notice will be provided when construction work including LSLR is scheduled in the area. Marine City will request permission from residents before entering homes for LSLR. Efforts will be made to complete this work as efficiently as possible with minimal interruption to residents.

Marine City has determined that contaminated sites are located within the construction footprint and there is a potential to encounter contaminated materials during construction. Appropriate steps will be taken to mitigate any potential impacts. This includes proper identification and appropriate off-site disposal of any contaminated material they may encounter.

Short-term adverse impacts associated with construction include noise, dust, exhaust fumes, removal of groundcover, and increased erosion potential. These impacts are expected to be minimal and, for the most part, will not extend beyond the period of construction. Appropriate sedimentation and control measures will be taken when necessary. Mitigation measures will be taken to prevent damage to surrounding areas from soil, erosion, dust, and sedimentation.

C. Operational Impacts

Upgrades to equipment and processes will ensure the WTP continues producing quality water to users, lowering risk of shutdowns or limited capacities resulting from equipment failures and downtime during maintenance and repairs. Water main looping, replacement, and LSLR will benefit the public health and safety by increasing the quality and reliability of drinking water while reducing water loss and financial cost associated with emergency maintenance and repairs.

D. Secondary Impacts

No significant secondary impacts are anticipated for this project. The project will address WTP deficiencies and replace aging infrastructure, improving system reliability. LSLR and water main replacement and looping will occur in areas that are already serviced by the distribution system. Marine City's population is not expected to increase so unrestricted growth is not anticipated. These efforts will improve drinking water treatment, quality, and reliability while protecting public health and safety.

PUBLIC PARTICIPATION

Marine City held an in-person public meeting on May 18, 2023, at Marine City's City Hall. The public meeting was advertised on Marine City's website on May 8, 2023. Attendees asked questions regarding the need for loan funding, whether grants were available, anticipated impacts to user rates, and road construction. These questions were addressed by Marine City's representatives and their consultants. The project planning document was approved and adopted by the City Commission on May 18, 2023.

REASONS FOR CONCLUDING NO SIGNIFICANT IMPACTS

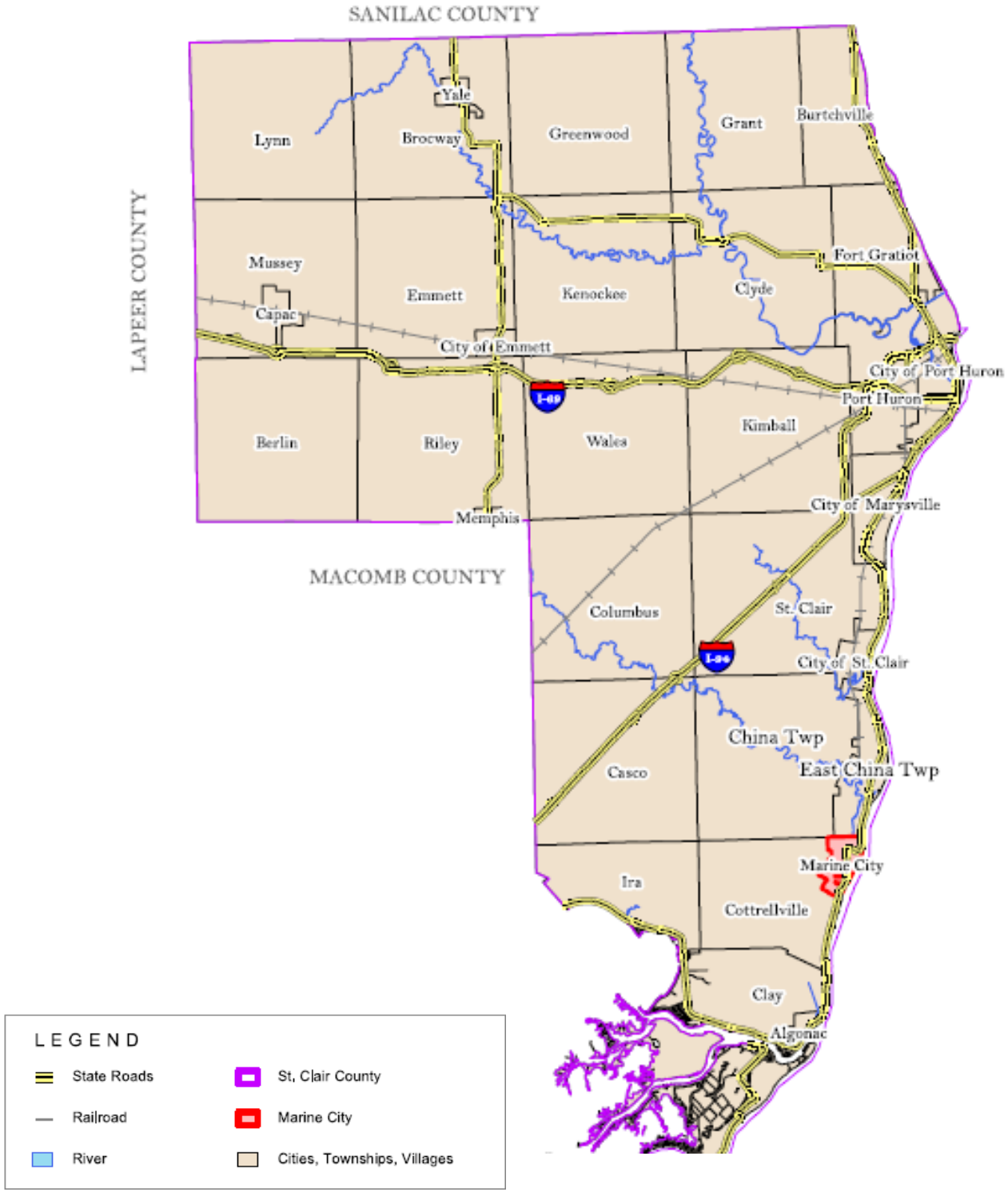
The Marine City WTP, storage tower and water intake pipe improvements, water main looping and replacement, and LSLR will have no significant adverse direct, indirect, or cumulative impacts on the socioeconomic, cultural, or environmental factors. Minor construction impacts

will be temporary and localized to construction zones and developed areas or occur within the footprint of various project sites. EGLE staff have carefully reviewed the project planning document and determined no significant adverse impacts are anticipated as a result of project implementation. Therefore, a finding of no significant impact has been made.

Questions regarding this Environmental Assessment should be directed to:

Chelsea Walsh, Project Manager
Water Infrastructure Funding and Financing Section
Finance Division
Michigan Department of Environment, Great Lakes, and Energy
P.O. Box 30457
Lansing, Michigan 48909-4957
Telephone: 517-599-7218
Email: WalshC3@Michigan.gov

Figure 1
Location of Marine City



<u>Figure 2</u>
Location of Water Main Replacement and Looping, Water Treatment Plant, Storage Tower, and Intake Pipe

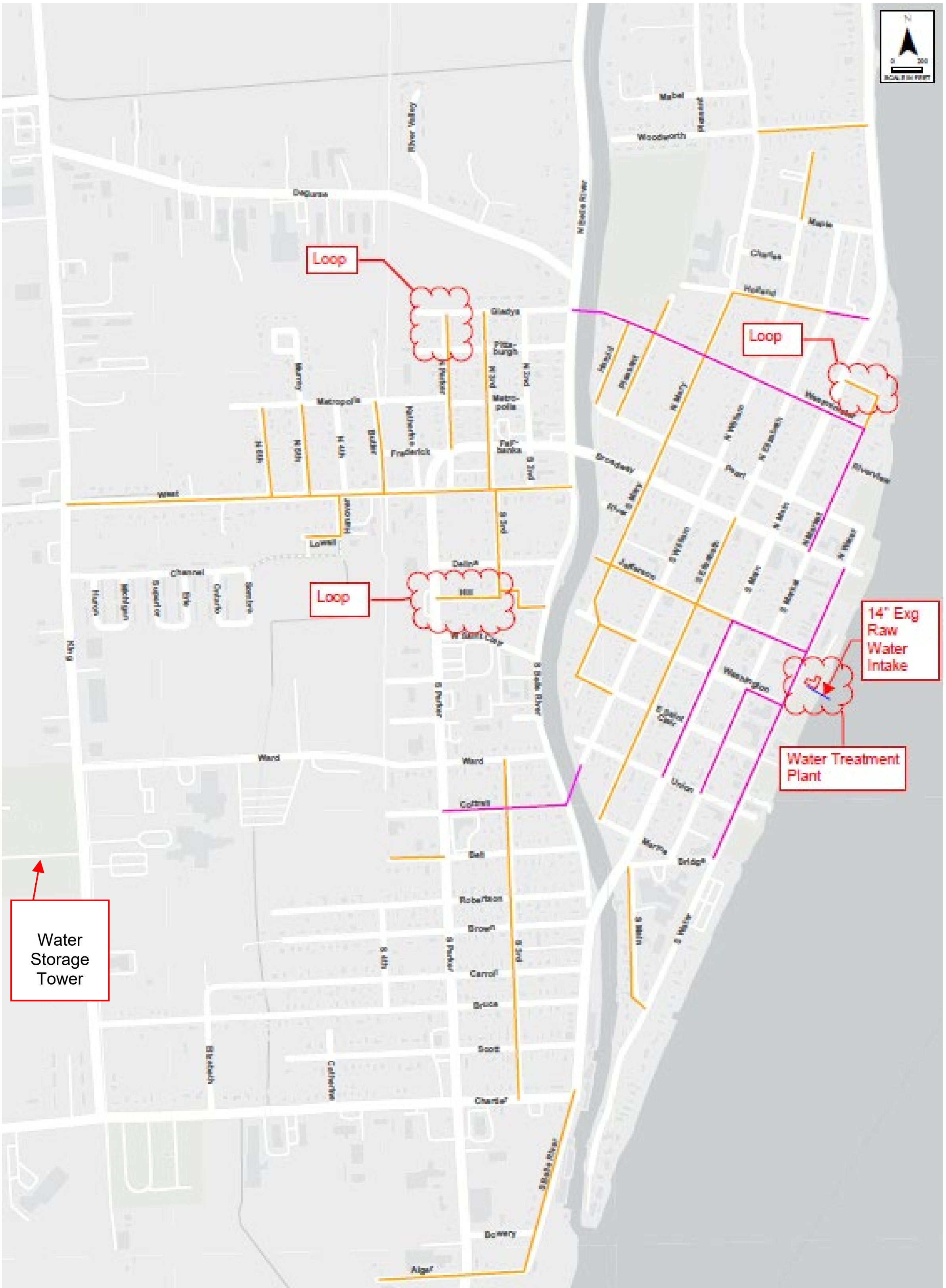
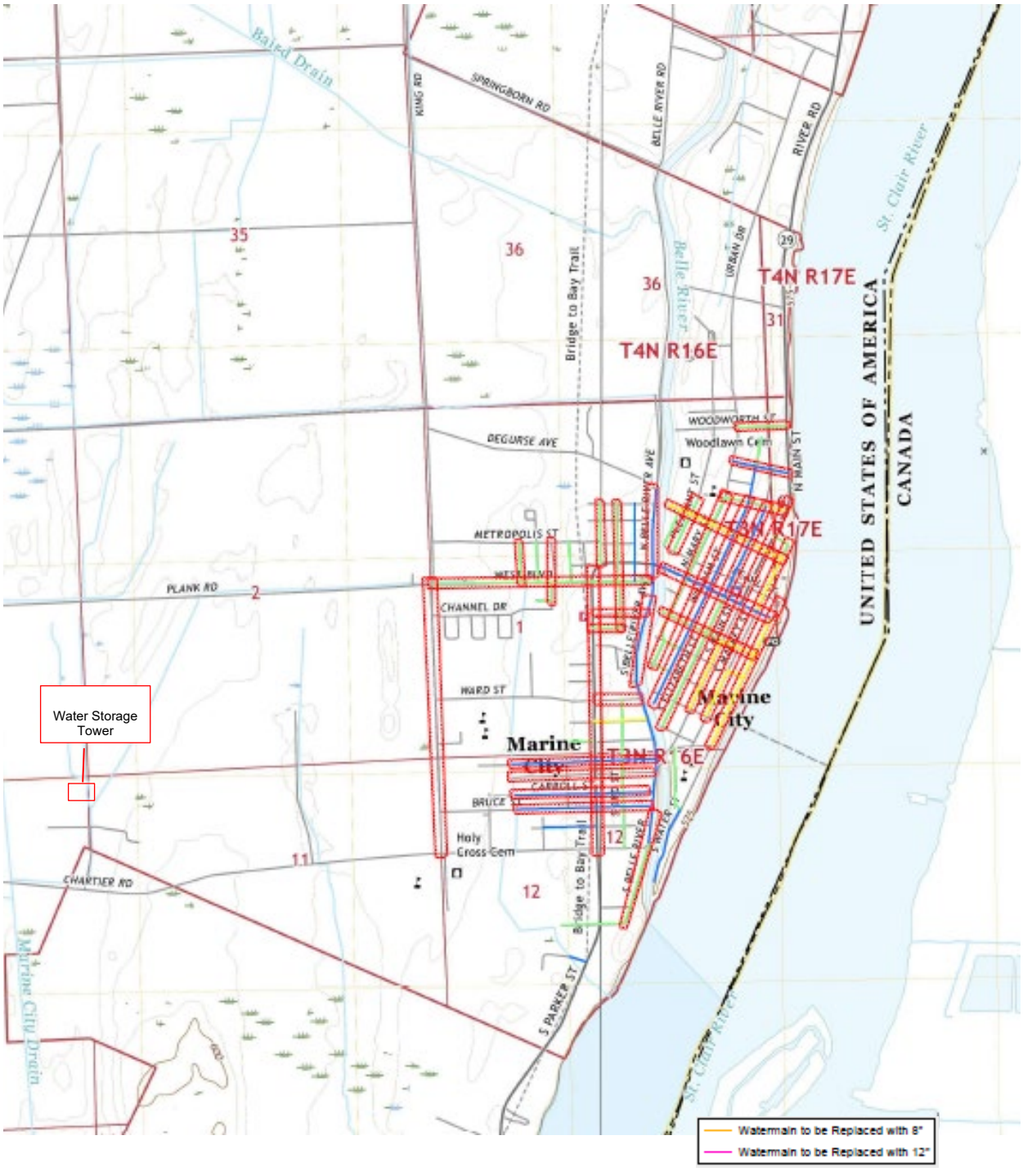


Figure 3
Lead Service Line Replacement Locations



Water Main to be Replaced with 8"
Water Main to be Replaced with 12"
Water Mains for Future Replacement

Areas with identified Lead or Galvanized Services