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GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

December 3, 2021

TO: All Interested Citizens, Organizations, and Government Agencies

SUBJECT: **DRINKING WATER STATE REVOLVING FUND (DWSRF)
CATEGORICAL EXCLUSION
City of River Rouge, Wayne County
DWSRF Project Number: 7601-01**

The purpose of this notice is to advise interested parties of a proposed decision by the Michigan Department of Environment, Great Lakes, and Energy (EGLE) that the criteria for qualifying for a Categorical Exclusion are met and this project will not have a significant adverse impact on the environment or public health, and thus, qualifies for a Categorical Exclusion under Section 5408 of 1994 PA 451. Consequently, an Environmental Assessment or an Environmental Impact Statement is not required to implement the water supply project discussed in the attached document.

CRITERIA USED IN MAKING THE DETERMINATION

Part 54 of the Safe Drinking Water Assistance Act specifies six exclusionary criteria that must be met before EGLE can conclude that a proposed project qualifies for a Categorical Exclusion. The criteria are as follows:

- (1) The project must not result in an increase in residuals and sludge generated by drinking water processes which would negatively impact the performance of the waterworks system or the disposal methods or would threaten an aquifer recharge zone.*
- (2) The proposed facilities must not be designed to provide service to a population greater than 30 percent of the existing population, unless population projections required in section 5405(3)(e) support projected needs.*
- (3) The proposed public water supply project must not be expected, to directly or indirectly affect cultural areas, fauna or flora habitats, endangered or threatened species, or environmentally important natural resource areas.*
- (4) The proposed public water supply project must not directly or indirectly involve the extension of transmission systems to new service areas.*
- (5) The proposed public water supply project has been shown to be the cost-effective alternative.*
- (6) The proposed public water supply project will not cause significant public controversy.*

PROJECT DETAIL

An attachment describing the proposed project is provided. This information is also available on our website at Michigan.gov/DWSRF under "Related Links." It presents information related to the proposed project, including the alternative selected, rationale for our decision to grant a Categorical Exclusion, and other pertinent information. Map(s) showing the location of the proposed project are also included.

The attachment provides information and allows appropriate federal cross-cutter agencies and state agencies an opportunity to submit information that may impact EGLE's decision prior to its effective date. Significant issues raised by these agencies could result in EGLE staff preparing a full Environmental Assessment.

WHERE DO I SUBMIT COMMENTS?

Any comments regarding this decision should be submitted to:

Ms. Leni Steiner-Zehender, Project Manager
Water Infrastructure Financing Section
Finance Division
Michigan Department of Environment, Great Lakes, and Energy
P.O. Box 30457
Lansing, Michigan 48909-7957

EFFECTIVE DATE OF THE EGLE DECISION ON THE CATEGORICAL EXCLUSION

Absent comments that introduce significant information contrary to EGLE's final determination, the Categorical Exclusion will become effective upon conclusion of the 30-day comment period.

Questions regarding this project can be directed to Ms. Leni Steiner-Zehender, project manager, Water Infrastructure Financing Section, Finance Division, by phone at 517-231-9913, by email at Steinerl@michigan.gov, or by mail at EGLE, P.O. Box 30457, Lansing, Michigan, 48909-7957; or you may contact me. Your interest in this process is greatly appreciated.

Sincerely,



Kelly Green, Administrator
Water Infrastructure Financing Section
Financing Division
517-284-5433

Attachment

DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
Drinking Water State Revolving Fund (DWSRF)
City of River Rouge, Wayne County
Categorical Exclusion
December 2021

PROJECT IDENTIFICATION

Applicant: City of River Rouge

Authorized Representative: Kelli Burke, Assistant Water/Sewer Superintendent

Address: 10600 West Jefferson Avenue
River Rouge, Michigan 48218

Project No. 7601-01

PROJECT OVERVIEW

The City of River Rouge (River Rouge) is located southwest of the city of Detroit on the Rouge and Detroit Rivers in Wayne County and has a land area of approximately 3.2 square miles. River Rouge has a residential population of 7,380 according to the Southeast Michigan Council of Governments. The service population is expected to decrease to 5,462 by 2045 and thus drinking water demand is not anticipated to change significantly in the next 20 years.

River Rouge is applying for a DWSRF loan administered by the Michigan Department of Environment, Great Lakes, and Energy (EGLE) for the replacement of lead service lines (LSLs). As a disadvantaged community undertaking lead service line replacement (LSLR), River Rouge is eligible to receive Water Infrastructure Fund Transfer Act funding through the DWSRF, which can provide up to 100 percent principal forgiveness for construction activities related to lead service line replacements not to exceed a \$5,000 per replacement average.

The estimated cost of the project is \$3,510,000. Of that, River Rouge is requesting \$3,000,000 from the DWSRF in construction costs to replace known lead water service lines. The remainder of the costs will be for project design, engineering, bond council, financial service fees, and legal and administrative expenses which will be paid for by River Rouge with cash on hand. As a result, construction associated with the lead service line replacement financed by the DWSRF will occur with no rate impact to the system customers.

EXISTING SYSTEM

River Rouge obtains its potable water from the Great Lakes Water Authority. There are no storage facilities or pump stations in River Rouge. The River Rouge water distribution system consists of water mains that ranges from 4-inches to 16-inches in diameter. Most of the distribution system consists of cast or ductile iron pipe. The River Rouge distribution system has an estimated 3,025 water service connections (see Figure 1), all of them believed to be LSLs.

NEED FOR PROJECT

LSLR is intended to improve the drinking water quality by removing potential lead contamination. Lead in drinking water can have serious negative impacts on human health, and the removal of LSLs over a 20-year period was mandated by the 2018 revisions to the Michigan Lead and Copper Rule.

PROPOSED PROJECT

The proposed project involves the replacement of approximately 600 existing LSLs. This includes complete replacement of existing lead and galvanized water services with Type K copper material from the existing water main to the water meter inside the dwelling. The new water service line will also include a new tap and curb stop box. Water service lines will be installed using the directional drilling method with minimal excavations required. New services will be placed parallel to existing services and the existing service disconnected from the structure and abandoned in place. The proposed project is expected to start construction in Spring of 2022 with a completion date of Spring of 2025.

TABLE 1 – Project Cost

Component	Cost
LSLR	\$3,000,000
Total Project Construction Costs	\$3,000,000
Engineering, legal, financial, and administrative fees.	\$510,000
Total Project Cost	\$3,510,000

The proposed project is expected to be financed with a 20-year loan at 1.875 percent interest from the DWSRF. However, River Rouge is expected to receive \$3,000,000 in principal loan forgiveness for lead service line replacement and will use cash on hand to cover the engineering, legal, financial, and administrative fees. As a result, the construction associated with the lead service line replacement financed by the DWSRF will occur with no rate increase for they system customers.

EXISTING ENVIRONMENT AND POTENTIAL IMPACTS

Construction Impacts

Construction of the project will result in short-term impacts such as noise, dust, and traffic disruption in the project area. Residents and businesses that will be affected by this project will be notified of the upcoming project at least 45 days prior to the start of any work taking place and will require a waiver to replace the water service line on their private property. Residents and businesses will also be notified at least 48 hours before the contractor will be on-site to perform proposed replacements to provide sufficient time for the property owner to prepare for temporary water shut off and to allow the contractor access to the dwelling to make the final connection within the home. The construction will be within the existing footprint of the water distribution system, using directional drilling, and should not significantly impact the surrounding commercial and residential properties or the environment.

Water Quality Impacts

The proposed project will have a positive effect on the drinking water quality in River Rouge by removing potential lead contamination from the drinking water system and improving public health and quality of life. Replacement of water services will utilize trenchless technologies with access pits located at the connection to the water main, at the location of the water shut-off box, and at the right-of-way line nearest the structure being provided service. For any necessary open-cut excavation, special attention will be required when stockpiling excavated materials to not interfere with existing drainage patterns and transfer particulates into the drainage system.

Endangered Species

The United States Fish and Wildlife Service (USFWS) shows the potential for several threatened and endangered species in St. Clair County, including the Indiana bat, Northern long eared bat, Piping plover, Rufa red knot, Eastern massasauga rattlesnake, Rayed bean's clam, Snuffbox mussel, and the Eastern prairie fringed orchid. However, there is no critical habitat in the project area. If endangered species are encountered all work will be stopped until further notice so that River Rouge consult with the USFWS to identify alternative solutions to construct the proposed project without destroying an endangered species habitat. River Rouge has researched current floodplain maps for Wayne County and consulted recent wetlands inventories to identify existing wetlands and floodplains. It does not appear that any of the proposed work will take place in a designated floodplain or wetland. In addition, no agricultural lands exist within River Rouge.

Historical Preservation

It does not appear any historical or cultural resources will be impacted by the proposed project. However, if archeological, historical, or culturally significant artifacts are discovered during excavations, all work will be stopped and the State Historical Preservation Office and associated Tribal Historic Preservation Officers will be contacted to come to the site and identify the artifacts, determine if additional artifacts may be uncovered, and provide direction on how to proceed with construction. The proposed project does not involve any work within or adjacent to any parks or recreational facilities.

PUBLIC PARTICIPATION

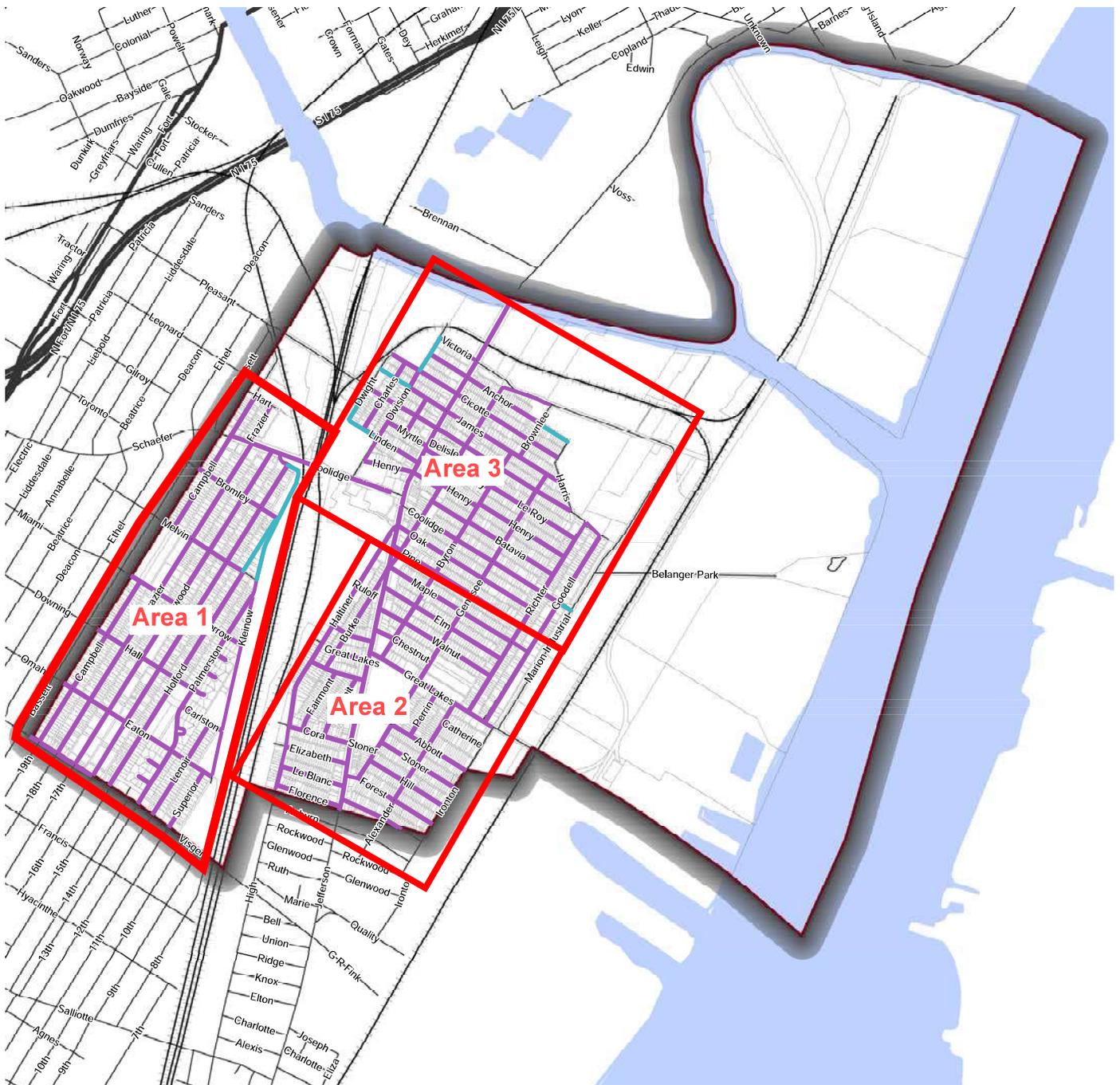
A public hearing to discuss the proposed project was held by River Rouge at 6 pm on June 10, 2021, on Zoom. The hearing was advertised on May 6, 2021, in *The Telegram*, and the project plan was available for viewing at the River Rouge Office of the City Clerk. There were no public comments or questions. A resolution adopting the project plan and implementation of the selected alternative was unanimously approved by the River Rouge City Council on June 10, 2021.

RATIONALE FOR CATEGORICAL EXCLUSION

In accordance with Part 54, Safe Drinking Water Assistance, of Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, Section 5408(5) specifies criteria that must be met to grant a Categorical Exclusion from further environmental review activity to a proposed DWSRF assisted project. The Department of Environment, Great Lakes, and Energy staff has carefully reviewed the River Rouge LSLR project and related documents and has determined that no significant adverse impacts are anticipated by implementation.

Questions regarding this Environmental Assessment should be directed to:

Ms. Leni Steiner-Zehender
Water Infrastructure Financing Section
Finance Division
Michigan Department of Environment, Great Lakes, and Energy
P.O. Box 30457
Lansing, Michigan 48909-4957
Telephone: 517-231-9913
E-Mail: Steinerl@michigan.gov



Lead service Replacement Program

Data Sources: State of Michigan Geographic Data Library, ESRI Basemap, Wayne County GIS

-  City Boundary
-  State Roads
-  All Roads
-  Railroads
-  Rivers / Streams
-  Lakes / Ponds
-  Phase 1
-  Proposed Lead Service Line Replacement
-  Streets location

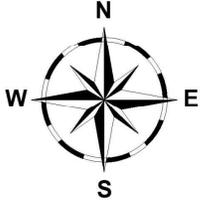


Figure 1