



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

June 21, 2021

TO: All Interested Citizens, Organizations, and Government Agencies

SUBJECT: FINDING OF NO SIGNIFICANT IMPACT  
**City of Menominee**  
**Wastewater, Water Main and Lead Service Line Replacements**  
**Clean Water State Revolving Fund Project No. 5732-01**  
**Drinking Water State Revolving Fund Project No. 7513-01**

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 plan submitted by the applicant mentioned above.

#### **HOW WERE ENVIRONMENTAL ISSUES CONSIDERED?**

Parts 53, Clean Water Assistance, and 54, Safe Drinking Water Assistance, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, being Sections 323.5301 to 324.5418 of the Michigan Compiled Laws Annotated, require 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 plan 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 plan 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/CWSRF](http://Michigan.gov/CWSRF) or [Michigan.gov/DWSRF](http://Michigan.gov/DWSRF) under "Related 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, Constitution Hall, P.O. Box 30457, Lansing, Michigan 48909-7957. We will not take any action on this project plan 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 Ms. Valorie White, the project manager, at 517-599-5879, by email at [WhiteV1@michigan.gov](mailto:WhiteV1@michigan.gov) or you may contact me. Your interest in this process and the environment is appreciated.

Sincerely,



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

Attachment

**DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY**  
**Clean Water State Revolving Fund and Drinking Water State Revolving Fund**  
**Environmental Assessment**  
**City of Menominee, Menominee County**  
**June 2021**

**PROJECT IDENTIFICATION**

**Applicant:** City of Menominee

**Address:** 2511 Tenth Street  
Menominee, Michigan 49858

**Authorized Representative:** Mr. Tony Graff, City Manager

**Project Numbers:** 5732-01 and 7513-01

**PROJECT SUMMARY**

The City of Menominee (City) is applying for a 30-year low interest Clean Water State Revolving Fund (CWSRF) loan and a Drinking Water State Revolving Fund (DWSRF) loan administered by the Michigan Department of Environment, Great Lakes, and Energy (EGLE) for the installation of sewer main, water main, and lead service line replacement.

The total estimated combined project cost is \$5,260,000, with a \$1,900,000 CWSRF loan, and a \$3,360,000 DWSRF loan. The City has qualified for an estimated \$45,500 of loan principal forgiveness for lead service line removal. As a result of this project, the typical residential customer will see an increase in their wastewater costs of up to \$4.78 per quarter, and their water cost of up to \$8.15 per quarter.

Project construction is anticipated to begin in fall of 2021 and be completed by the end of the summer of 2022.

**PROJECT BACKGROUND**

The City is located in Menominee County, in the southern most central portion of the Upper Peninsula. This project consists of wastewater and water main replacement, as well as lead service line replacement. Existing land use for the City is not expected to change, and the population is projected to continue to slowly decline.

**PROPOSED PROJECT**

**A. Project Need/Justification**

The City owns both their wastewater collection and treatment system, and their water distribution and treatment system. The wastewater treatment plant is overseen by Infrastructure Alternatives Inc. while the City maintains the collection system. The collection system is made up of approximately 244,000 linear feet of 8-inch to 54-inch diameter mains of clay, concrete, and polyvinyl chloride. A 3.2 million gallons per day (MGD) treatment plant utilizes activated sludge treatment with anaerobic biosolid digestion and chlorine disinfection before being discharged into the Menominee River.

Infrastructure Alternatives Inc. also provides the operation and maintenance for the City's water system. Source water comes from Green Bay and flows up to the 4.0 MGD water

treatment plant, where the water undergoes coagulation, flocculation, sedimentation, and filtration before entering the distribution system. The City has about 323,000 linear feet of 2-inch to 24-inch diameter cast iron and ductile iron water mains, two water tanks, and a booster station.

In recent years, the City has completed both a wastewater and a drinking water asset management plan, which were used to determine the scope of this project. Due to the age of the systems, sanitary sewer and water main breaks are becoming more frequent. This project seeks to address water mains and sewers with serious structural issues. Sanitary sewer breaks disrupt service and create potential problems with sewage leaking into surface waters and groundwater. Furthermore, it can cause a public health issue when the sewage backs up into homes and businesses. Water main breaks also disrupt service, require more water to be treated and transported, and create public health risks with potential for bacteria and other contaminants to enter the water distribution system. Another issue the City faces is tuberculation in the pipes leading to aesthetic issues, reduced fire flows, and pressure limitations.

In 2018 Michigan's Lead and Copper Rule was passed, requiring all lead service lines, or galvanized lines that either currently or historically have been connected to lead, to be replaced. The City has determined that some of their service lines are lead or are likely to be lead. Therefore, the City intends to replace as many service lines as they can as part of this project.

## **B. Alternatives Considered**

### No-action Alternative

The no-action alternative would result in continued main breaks causing the City to conduct repairs on an emergency basis, and increased infiltration and inflow leading to higher costs to replace lost drinking water. This alternative was not considered further.

### Regional Alternative

The issues facing the City are specific to the actual pipes in the collection and distribution systems. Repairs or replacements to the systems would be required regardless of a regionalization plan. Therefore, this alternative was not considered further.

### Optimization

Optimization of existing facilities without capital improvements will not restore service life to the wastewater collection or water distribution systems. Therefore, it was not considered further.

### Project Alternatives

Two main alternatives were considered by the City. The first was the system rehabilitation alternative, which would repair the existing wastewater and water mains throughout the City. Included in this project is the replacement of valves, manholes, and hydrants, and well as lead service lines. This alternative would reline any mains that are still structurally sound and would utilize pipe bursting to replace old and deteriorating mains that could not be lined. Relining and pipe bursting, while extending the life of the main, is an expensive option, compared to traditional open cut installation. Furthermore, this work will be done in residential areas, with a large number of service lines, all of which would need to be reconnected. Additionally, the City has local road funding that they want to utilize in conjunction with this project. With all installation methods proposed being underground, there is no benefit to the City for doing the infrastructure and road work together, and any restoration savings these installation methods might have offered are moot.

The second alternative considered is system replacement. This alternative would replace sewer and water main utilizing the traditional open cut method. Similar to above, this alternative includes the replacement of valves, manholes, hydrants, and lead service lines. The City intends to replace approximately 25 lead service lines in the area of main replacement, as well as up to 309 additional lead service lines throughout the City. This option gives the City the longest useful life for their pipes and allows for the most impact in utilizing their road funding resources.

#### Selected Alternative

The City determined the system replacement alternative was the best option (Figure 1). This alternative involves the replacement of approximately 4,200 linear feet of sanitary sewer main, and 5,100 linear feet of water main. Open cut will be utilized for the main replacement, with local road funding used to resurface the roads. Associated valves, manholes, hydrants, and other components will be included. Also, as part of the project the City intends to replace 334 lead service lines located throughout the City.

### **C. Project Cost and Implementation**

Overall, this project is estimated at \$7,475,000. This includes design, construction, contingencies, financial, administrative, legal, and engineering services. The City intends to utilize local road funding in the amount of \$2,246,000. Therefore, the anticipated loan amounts are \$1,900,000 for CWSRF, and \$3,360,000 for DWSRF for a combined total cost of \$5,260,000.

It is anticipated the project will be financed by a low-interest loan through the CWSRF program, and the DWSRF program administered by EGLE and the Michigan Finance Authority. Menominee is removing lead service lines, which provides the City with an estimated \$45,500 in loan principal forgiveness.

As a result of this project, the typical residential customer will see an increase in their wastewater rates of up to \$4.78 per quarter, and an increase of their water rates of up to \$8.15 per quarter.

Project construction is anticipated to begin in the fall of 2021 and be completed by the end of the summer of 2022.

## **IMPACT OF PROJECT**

### **A. Water Quality Impacts**

The proposed project will include replacement of sewer and water main, as well as the replacement of lead service lines. Replacing sewer mains will protect surface and groundwater by removing sources of contamination and will help protect the environment. Water main replacement protects public health by removing potential sources of contamination for resident's drinking water, either from water main breaks or lead service lines.

### **B. Primary Impacts**

Impacts of construction activities associated with the project are considered short-term disruptions that, for the most part, will not extend beyond the period of construction. Short-term adverse impacts associated with construction include noise, dust, exhaust fumes, removal of groundcover, and increased erosion potential.

Construction associated with the CWSRF and DWSRF projects will occur in designated right-of-ways. Some trees will need to be removed as part of the road restoration process. Construction contract provisions will be enforced for compliance with the Soil Erosion and Sedimentation Control Act to prevent damage to the surrounding areas from soil erosion, dust, and sedimentation.

The Michigan Natural Features Inventory and the United States Fish and Wildlife Service have reviewed the proposed project for impacts to endangered/threatened species. Since no endangered or threatened species or high-quality habitat occur within the construction area, it has been determined that there will be no impact to the species of concern.

The State Historic Preservation Officer and Tribal Historic Officers have reviewed the proposed project for impacts on historical, archeological, religious, or culturally significant resources. It has been determined that there will be no impact on these resources from the construction of the project.

### **C. Secondary Impacts**

No significant secondary impacts are anticipated as a result of this project. The project was designed to address the need for clean safe drinking water and sanitary sewers, as well as accommodate expected 20-year needs. Improvements to the system are associated with the need to address deficiencies, public health threats, and increase the reliability of the system.

### **PUBLIC PARTICIPATION**

A formal public hearing for the proposed project was held in person at the Menominee City Hall on June 15, 2020, after notice was given in the *Eagle Herald* newspaper on May 16, 2020. Presentations were made on the project plan, including alternatives considered, project impacts, and estimated costs. Questions and comments were addressed at the public hearing. After the closing of the public hearing, the City of Menominee passed resolutions approving the project plan and agreeing to implement the selected alternative.

### **REASONS FOR CONCLUDING NO SIGNIFICANT IMPACTS**

The proposed project will address aging wastewater and water mains and extend the life of the systems. The water quality benefits anticipated from the project are expected to outweigh the short-term adverse impacts. Preventing sewage leaks, water main breaks, and removing lead service lines will provide long-term beneficial impacts.

Questions regarding this Environmental Assessment should be directed to:

Ms. Valorie White, Project Manager  
Water Infrastructure Financing Section  
Finance Division  
Michigan Department of Environment, Great Lakes, and Energy  
P.O. Box 30457  
Lansing, Michigan 48909-4957  
Telephone: 517-284-5433  
E-Mail: [Whitev1@michigan.gov](mailto:Whitev1@michigan.gov)

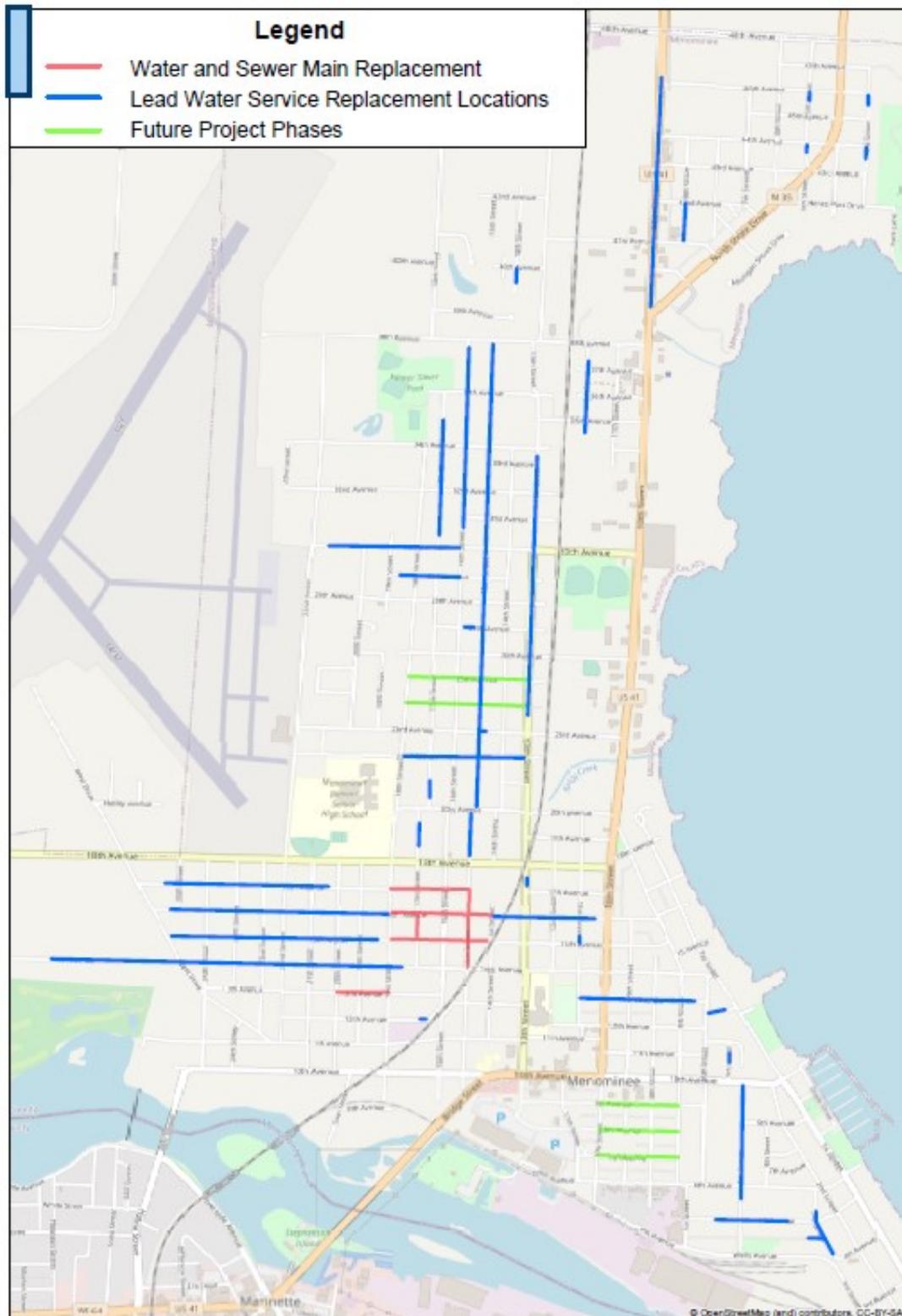


Figure 1: Location of the water main, sewer, and service line replacement in the City of Menominee.