



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

November 19, 2021

TO: All Interested Citizens, Organizations, and Government Agencies

SUBJECT: FINDING OF NO SIGNIFICANT IMPACT
City of Hamtramck, Wayne County
Full Lead Service Line and Water Main Replacement
Drinking Water Revolving Fund Project Numbers 7603-01 and 7604-01

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?

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 plan 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 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/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 Mr. Tim Dalrymple, the project manager, at 517-231-1779, or by email at DalrympleT@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

Attachments

DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
Drinking Water State Revolving Fund
Environmental Assessment
City of Hamtramck, Wayne County
November 2021

PROJECT IDENTIFICATION

Applicant: City of Hamtramck, Wayne County

Address: 3401 Evaline Street
Hamtramck, Michigan 48212

Authorized Representative: Mr. William Diamond, Director of Public Services

Project Numbers: 7603-01 and 7604-01

PROJECT OVERVIEW

The City of Hamtramck (Hamtramck) is applying for a Drinking Water State Revolving Fund (DWSRF) loan administered by the Michigan Department of Environment, Great Lakes, and Energy (EGLE) for the replacement of lead service lines and antiquated cast iron and ductile iron water main. As a disadvantaged community undertaking lead service line replacement, Hamtramck is eligible to receive Water Infrastructure Fund Transfer Act (WIFTA) funding through the DWSRF loan, which can provide up to 100 percent principal forgiveness for construction activities related to lead service line replacement. The water main project will be funded through the DWSRF loan program. The projects will be split into two separate loans; 7603-01 will finance the replacement of lead and galvanized water service lines from the water main to the structure, and 7604-01 will address the water main replacements.

The total estimated cost of the lead service line replacement project is \$3,510,000. Of that, Hamtramck is requesting \$3,000,000 in construction costs to replace known lead and galvanized water service lines. The remainder of the costs are for the project design and construction engineering, bond counsel and financial service fees, and legal and administrative expenses, and will be paid back over a 20-year period.

The estimated cost of the water main replacement project is \$3,900,000. Hamtramck is expected to receive approximately \$1,170,000 of that as grant funding through the Michigan Clean Water Plan's, Drinking Water Infrastructure Grant program. In addition, as a disadvantaged community, Hamtramck is expected to receive an estimated \$791,700 in principal forgiveness on the DWSRF portion of this loan.

Construction is scheduled to begin for both projects in April 2022. The lead service line replacement project is anticipated to be completed by September 2023 and the water main replacement and looping project by September 2024. The loan's debt service (estimated at \$1,938,300) will be paid by a sewer and water rate increase of \$76.70 per year or \$6.39 per month per water customer account.

PROJECT SETTING AND POPULATION

Hamtramck is in Wayne County, comprised of 2.1 square miles and is mostly surrounded by the City of Detroit, with the northwestern corner of Hamtramck bordering the City of Highland Park (Figure 1). The land use within Hamtramck mainly consists of single-family residential properties

with commercial properties along the major thoroughfares of Joseph Campau Avenue, Holbrook Avenue, Caniff Avenue, and Conant Avenue. There are also some industrial corridors in the south and western boundaries of the city.

Hamtramck's population is expected to increase over the next 20 years from approximately 22,934 persons in July 2020 to approximately 23,349 persons by 2045.

Hamtramck has municipal water and sanitary sewer services throughout the entire city. The water distribution and wastewater collection systems within the city are owned and maintained by the Hamtramck Department of Public Services. It consists of approximately 41.9 miles of pipe. The water mains range from 4-inch-diameter to 24-inch-diameter pipes consisting of either cast iron or ductile iron material. Treated water is purchased from the Great Lakes Water Authority (GLWA) and provided through transmission mains running through the City of Detroit. The drinking water system was established between 1890 and 1930 with little or no replacement since installation.

PROPOSED PROJECT

A. Project Need/Justification

Lead Service Line Replacement Project

Due to the changes implemented in June of 2018 to the Michigan Lead and Copper Rule (LCR) within the Safe Drinking Water Act 399 of 1976, Hamtramck is required to complete full water service line replacements where lead and galvanized water services that either currently or were historically connected to lead exist from the water main into the dwelling for each property regardless of if the service line is on public or private property. Historically, for new water main installations, Hamtramck would replace the portion of the water service line from the new water main or existing water main to the curb stop box located at the right-of-way line, typically called a partial service line replacement. It was the responsibility of the homeowner to maintain the service line from the curb stop box to the dwelling.

The changes to the LCR require communities to replace all lead and galvanized service lines at an average of five percent per year beginning in 2021, not to exceed 20 years, or in accordance with an alternate schedule incorporated into a drinking water asset management plan and approved by EGLE. The full-service line needs to be replaced by the water supply at the water supply's expense, regardless of ownership. Recently, Hamtramck was awarded federal aid assistance for three road reconstruction projects within the city limits. As a result of the construction, Hamtramck has elected to replace the approximately 100-year-old water main located directly underneath the roads being reconstructed using city water and sewer funds.

Hamtramck plans to replace an estimated 700 lead water services as part of this project. Records do not exist on the exact material of the service lines so this number and replacement locations could change throughout the city depending on what is found during the project. Additional locations not noted in this Environmental Assessment may be added if needed.

Water Main Replacement and Looping Project

Hamtramck developed an Asset Management Plan (AMP) for its drinking water system. The AMP included an inventory of assets associated with the drinking water facilities and condition assessments to identify current condition, useful life, value, and develop a capital improvement plan. The findings of the AMP indicated that much of the existing water main is past its useful life, not working efficiently, and/or experiencing pipe breaks, and should be replaced.

The project includes installation of a water main on Joseph Campau that will connect to a dead end 12-inch-diameter water main on Hamtramck Drive. By reinstating this loop, redundancy will exist in this section of Hamtramck if a water main break were to occur in the area.

B. Project Alternatives

The following distribution system alternatives were evaluated.

Lead Service Line Replacement

No-action Alternative

For the no-action alternative, the service lines would not be replaced, this would not allow Hamtramck to meet the requirements of Michigan's LCR. Therefore, a no-action alternative was not considered.

Regional Alternative

There are no regional alternatives available to consider as Hamtramck maintains and operates its own water distribution system while receiving treated water from GLWA, and the work is within Hamtramck city limits.

Optimal Performance of Existing Facilities

Where they exist, full replacement of lead and galvanized water service lines is required to all dwellings served by water mains that are being replaced. There are also lead service line replacements that are not associated with any water main or road replacement projects. The location and anticipated number of water service line replacements are as follows:

**Table 1
2022 Lead Service Line Replacements**

Street Location	Between		Number of Service Leads
Goodson*	Joseph Campau	Lumpkin	79
Caniff*	Joseph Campau	Buffalo	142
Dan*	Joseph Campau	Park	13
Evaline	Joseph Campau	Gallagher	38
Yemens	Dequindre	Lumpkin	46
		TOTAL	318

*Water main replacement or pipe bursting project

Table 2
2023 Lead Service Line Replacements

Location	Between		Number of Service Leads
Prescott*	Ellery	Conant	60
Edwin	Buffalo & Ellery	Alpena	16
Wyandotte	Lumpkin	Brombach	29
Goodson	Joseph Campau	Gallagher/Road End	51
Oliver	Conant	Vincent	35
Norwalk	Dequindre	Lumpkin	33
Pulaski	Fleming	McKay	40
Geimer	Lumpkin	Brombach	7
Klinger	Casmere	Caniff	48
McDougal	Carpenter	Commor	41
		TOTAL	360

*Water main replacement or pipe bursting project

The service line replacements will be conducted by directional drilling with minimal excavations required and will start from the existing water main to at least 18 inches inside the dwelling or to the water meter inside the dwelling. Permission will need to be granted from each property owner to work within the private property boundaries in addition to gaining access to the inside of the structure to make the connection to existing plumbing.

Water Main Replacement and Looping Project

No-action Alternative

For the no-action alternative, due to condition and age, the existing water main will continue to be unreliable and undesirable for distributing high quality drinking water. Water main breaks will continue to occur and the potential for contamination entering the distribution system affecting public health will increase. Therefore, a no-action alternative was not considered.

Regional Alternative

There are no regional alternatives available to consider as Hamtramck maintains and operates its own water distribution system while receiving treated water from GLWA, and the work is within Hamtramck city limits.

Optimal Performance of Existing Facilities

Two alternatives were explored for the water main replacement project.

Water Main Replacement

Due to the age and condition of the water main in areas of proposed service line replacements, it is not cost effective to spot repair or line the existing water main, as the water main could unexpectedly break while conducting water service replacements. There is a concern that the new service line connections may affect the structural integrity of the existing water main causing additional main breaks increasing the project cost. In addition, because of the AMP work, water mains have been identified as past their useful life and need to be replaced or may continue to break due to age. Therefore, full replacement of the water main is the preferred alternative.

Water Main Rehabilitation

Under this alternative, the existing water main would be rehabilitated by installing a smaller diameter, carrier pipe into a larger host pipe and grouting the two pipes together and sealing the ends. This method is not applicable to one water main replacement that will be replaced during an open cut relief sewer project. It is also not a viable option for the other water main locations as it will reduce the size of the existing water main, affecting flow rates and overall water pressure within the pipe and the preparation to install the slip lining can cause the old water main to either break or shatter raising the costs of the project.

Water Main Looping

The only feasible alternative evaluated was to provide a new 12-inch-diameter water main connection from an existing 24-inch-diameter water main that exists on Joseph Campau Avenue to a 2,260 lineal foot dead-end water main that exists on Hamtramck Drive, east of Joseph Campau in the south end of Hamtramck. The installation of 240 lineal feet of water main to connect the dead-end main to Joseph Campau will create redundancy in this area should a water main break occur.

Selected Alternative

Based on the requirements in the LCR, the only alternative is to completely replace all lead or galvanized water service lines found within the road reconstruction and water main replacement construction project (Figures 2 and 3). Table 3 shows the breakdown of the proposed project costs.

Table 3
Estimated Project Cost – Lead Service Line Replacement

Description	Estimated Cost
Construction	\$3,000,000
Engineering, Legal, Financial, Administrative, and Contingencies	\$510,000
Total Estimated Project Cost	\$3,510,000

Based on the age of the water distribution system, the only acceptable alternative is for water main replacement in the five identified locations and the water main looping in the south portion of Hamtramck to ensure water will still be provided to the area in the event of a water main break (Figure 4).

Table 4
Estimated Project Cost – Water Main Replacement and Looping

Description	Estimated Cost
Construction	\$3,042,290
Engineering, Legal, Financial, Administrative, and Contingencies	\$857,710
Total Estimated Project Cost	\$3,900,000

RELEVANT ENVIRONMENTAL FEATURES AND POTENTIAL IMPACTS

A. Water Quality Impacts

There are no wetlands, floodplains, surface waters, or rivers within Hamtramck city limits that will be impacted by the project.

To meet safe drinking water standards, Hamtramck must provide a reliable water distribution network and continually maintain and properly operate the system to protect the health of its residents. By removing lead and galvanized water service lines from service and replacing antiquated water mains, Hamtramck is improving the drinking water distribution system, and water quality and reducing the possibility of contaminants entering the system through water main breaks.

B. Construction Impacts

Construction of the project will result in the typical short-term impacts such as noise, dust, and increased vehicle traffic to the proposed project site, as well as temporary road and driveway closures.

Once the project has been approved to proceed and the loan secured, Hamtramck will notify all affected residents and businesses a minimum of 45 day in advance that their water service line will be replaced, and that private property access will be required to complete the full water service replacement. Additional notifications and reminders of when the work will begin will also be provided at least one week in advance of the work starting.

A waiver will be prepared by Hamtramck that is reviewed and approved by the city's attorney to be signed by the property owner to allow work to take place on private property prior to the start of construction. Photos will be taken both inside and outside the structure, within limits of the private property, prior to and after the replacement of the service line to minimize the risk of damage claims by property owners. If property owners do not comply with allowing access to the property and refuse to sign off on the waiver, Hamtramck may shut off service to the property until compliance is met.

The new services will be placed parallel to the existing services and the existing service disconnected and abandoned in place. All existing lead or galvanized materials that are removed at connection points will be disposed of properly per requirements of lead disposal and at a certified disposal site or recycled at a facility that allows for lead materials.

C. Endangered Species and Historical Preservation

Federally listed threatened or endangered species and state recognized threatened, endangered, or species of special concern are not expected to experience adverse impacts as a result of the project. The project locations will occur in areas that have been previously disturbed and in an urbanized environment.

Hamtramck does not expect any historical or cultural artifacts to be encountered during construction. Should either historical or cultural artifacts be encountered during the project construction, work will cease immediately and the Michigan State Historic Preservation Office and the appropriate federally recognized tribal nations will be contacted.

E. Secondary Impacts

No secondary impacts are anticipated as a result of the project. The goal of this project is to improve the quality of drinking water distributed to residents and businesses, improve reliability of the water distribution network, replace aging drinking water system infrastructure, and comply with Michigan's Safe Drinking Water Act, 1976 Public Act 399, as amended, and revised LCR.

PUBLIC PARTICIPATION

A virtual public hearing was held on June 8, 2021, by Zoom to discuss the proposed projects. The notice of public hearing was published in the *Hamtramck Review* on April 23, 2021. There was one question and one comment from the public supporting the project. A resolution was passed by the city council adopting the project plan and selected alternative with five years and zero days.

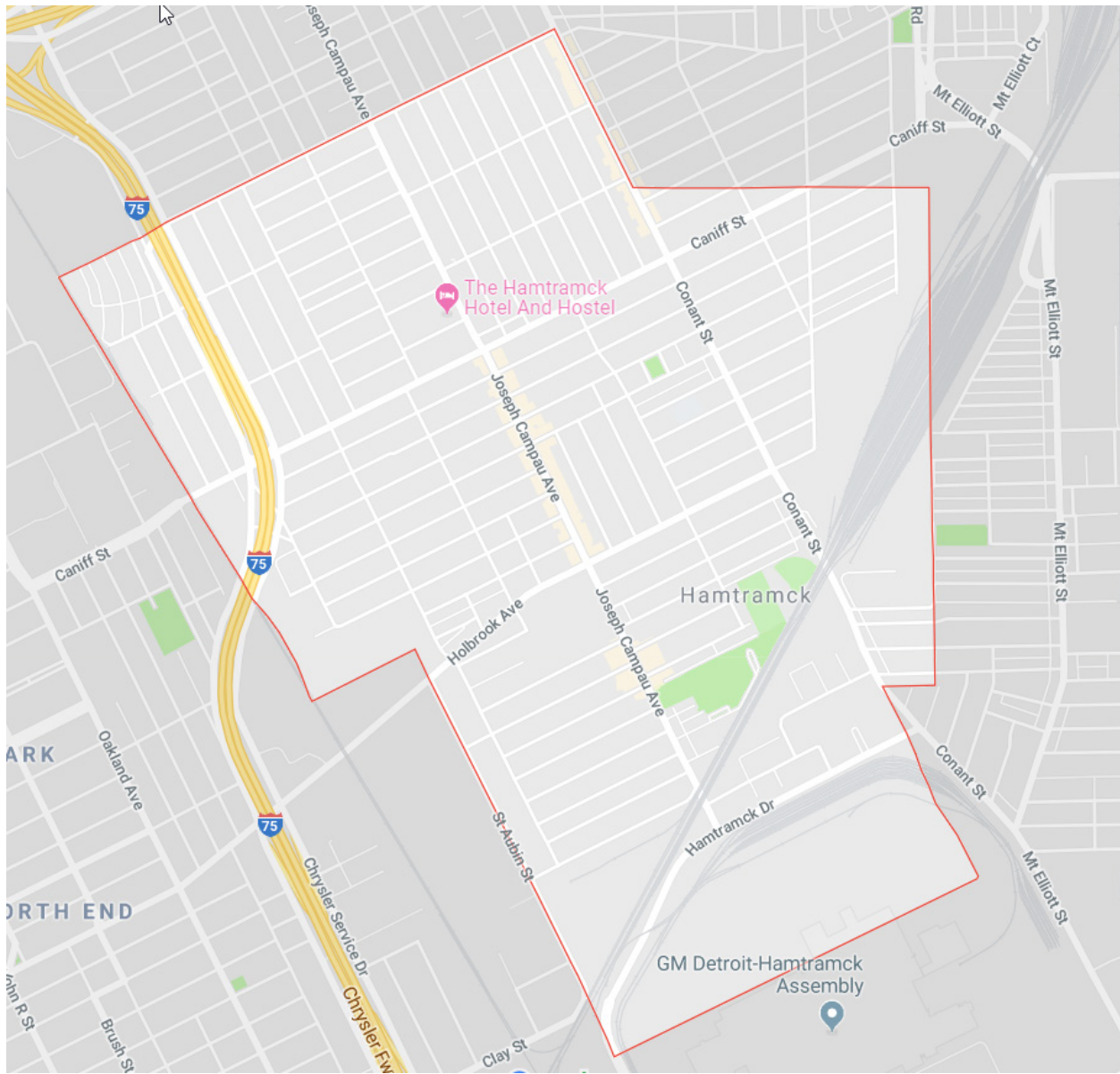
REASONS FOR CONCLUDING NO SIGNIFICANT IMPACTS

The proposed project is expected to have a positive impact for Hamtramck because it will improve the quality of drinking water distributed to residents and businesses. No adverse impacts are expected to result from the project. Therefore, a finding of no significant impact has been made.

Questions regarding this Environmental Assessment should be directed to:

Mr. Tim Dalrymple, Project Manager
Michigan Department of Environment, Great Lakes, and Energy
P.O. Box 30457
Lansing, Michigan 48909-7957
Telephone: 517-231-1776
E-Mail: DalrympleT@michigan.gov

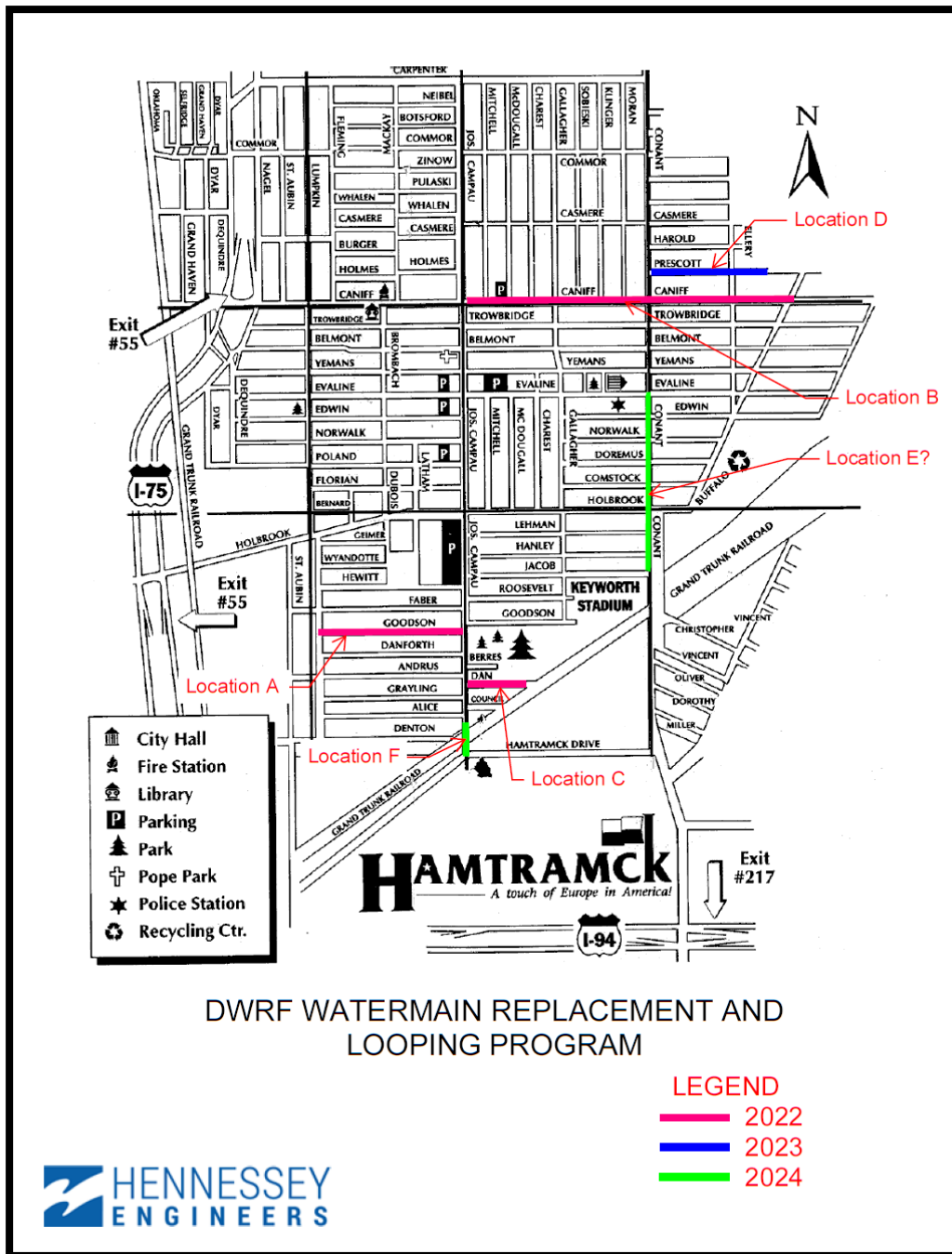
Figure 1
Location of Hamtramck



2022 Lead Service Replacement Locations



Figure 4
Water Main Replacement and Looping Locations



Location	Street	Limits	Years
A	Goodson Street	Joseph Campau to Lumpkin Street	2022
B	Caniff Avenue	Joseph Campau to Buffalo Street	2022/23
C	Dan Street	Joseph Campau to Veterans Park	2022
D	Prescott Street	Conant Street to Ellery Street	2023
E	Conant Street	Jacob Street to Evaline Street	2024
F	Joseph Campau	Denton Street to Denton Road	2024