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

GRETCHEN WHITMER
GOVERNOR

PHILLIP D. ROOS
DIRECTOR

March 22, 2024

TO: All Interested Citizens, Organizations, and Government Agencies

SUBJECT: FINDING OF NO SIGNIFICANT IMPACT
Oakland County Water Resources Commissioner
City of Pontiac Sewage Disposal System Rehabilitation Project
Clean Water State Revolving Fund Project Number 5901-01

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/CWSRF 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 Sarah Peterson, the project manager, at 517-438-3774; PetersonS12@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
Environmental Assessment
Oakland County Water Resources Commissioner
City of Pontiac Sewage Disposal System Rehabilitation Project
March 2024

PROJECT IDENTIFICATION

Applicant:	Oakland County Water Resources Commissioner
Address:	One Public Works Drive, Building 95 West Waterford Township, Michigan 48328
Authorized Representative:	Drew Sandahl, Oakland County Water Resources Commissioner's Office Chief Engineer
Project Number:	5901-01

PROJECT OVERVIEW

The City of Pontiac (Pontiac) is located in Oakland County and has a land area of approximately 20 square miles. The 2020 U.S. Census recorded a population of 61,606 for Pontiac and the population is expected to decrease slightly by approximately 525 over the next 20 years. However, the Pontiac Sewage Disposal System (SDS) also serves a portion of the City of Sylvan Lake, increasing the population served to 63,281.

The Oakland County Water Resources Commissioner's (OCWRC) Office owns and operates Pontiac's wastewater system. The OCWRC is seeking a Clean Water State Revolving Fund (CWSRF) loan, administered by the Michigan Department of Environment, Great Lakes, and Energy (EGLE), for collection system sewer and manhole repairs. The project will rehabilitate approximately 46,000 linear feet of sanitary sewer mains and repair/rehabilitation of approximately 267 manholes. Construction is anticipated to begin in August 2024 and be completed in December 2024. Figure 1 shows the entire area of Pontiac's SDS, and Figure 2 shows the area of the proposed project locations.

The total estimated project cost is $7,250,000. Since Pontiac qualifies as an overburdened community, the project is eligible to receive up to $2,301,250 in American Rescue Plan grant funds, $3,625,000 in CWSRF low interest loan, and $1,323,750 in CWSRF principal forgiveness. User costs for the average household in the Pontiac SDS system are anticipated to increase by approximately $0.68 per month for the duration of the loan term to service the loan debt.

PROPOSED PROJECT

A. Existing System and Project Need

Pontiac's sanitary sewerage system was originally constructed in the 1920's. Significant portions of the system operated as a combined sewer system until the sewers were separated in the 1970's. In 2012, the OCWRC Office purchased the system from Pontiac and owns and maintains the system.

The Pontiac SDS consists of approximately 272 miles of sewers, 6,200 manholes, and 11 lift stations. The lift stations were rehabilitated in 2016 and 2017. The sanitary sewer mains range from 4-inch to 78-inch in diameter and vary in materials from clay or vitrified clay pipe (VCP) in the oldest sections of the system to reinforced concrete or polyvinyl chloride (PVC) in the newer sections. Significant portions of the Pontiac SDS are estimated to be 75 years old or older. The collection system discharges into the Clinton River Water Resource Recovery Facility (CRWRRF).

Beginning in the early 2000's, the system has undergone multiple studies to assess wet weather inflow and infiltration (I/I). The Pontiac Project Performance Certification (PPC) report, developed in 2014, concluded that the wet weather peak flow rate of the system is larger than the treatment capacity of the CRWRRF downstream. Despite having a three-million-gallon equalization basin, the CRWRRF must sometimes discharge partially treated wastewater to surface waters during substantial wet weather events. As such, both the Pontiac SDS and CRWRRF are currently under a consent judgement to reduce wet weather flows and/or build a sewage retention basin.

As of 2022, approximately 62 percent of the gravity sewers and 41 percent of the manholes have been televised and inspected to assess their condition. Through this televising and inspection, the assets were rated using the National Association of Sewer Service Companies Pipeline Assessment Certification Program and Manhole Assessment Certification Program. Many of these sewers and manholes received a structural rating of 4, significant defect grade, or 5, most significant defect grade. These structural ratings indicate imminent failure for these assets threatening public health and the environment. Due to the risk of imminent failure, the OCWRC Office has proposed to rehabilitate identified sanitary sewer mains and manholes. The rehabilitation of sanitary sewer mains and manholes due to the identified structural defects will also have a secondary benefit of addressing I/I within the collection system.

B. Project Alternatives

The following alternatives were evaluated.

No Action

Taking no action is not a feasible alternative for Pontiac's sanitary sewer system as it would result in continued discharges from the CRWRRF which poses a potential threat to the human and environmental health of Pontiac. Additionally, the consent judgement would remain unfulfilled. Therefore, this alternative was not considered further.

Regionalization

Regionalization is not a feasible alternative for Pontiac's sanitary sewer system other than the continued coordination with the CRWRRF system. The neighboring Clinton Oakland SDS and Evergreen-Farmington Sanitary Drain Drainage District do not have the capacity required for the excess flow from the significant wet weather events which result in the partially treated wastewater discharges from CRWRRF. Therefore, this alternative was not considered further.

Increased CRWRRF Capacity

Increasing the treatment capacity of CRWRRF to sufficiently address all wet weather flows is not a feasible alternative. While the capacity could be increased from approximately thirty-

million-gallons per day to forty-million-gallons per day, this increase would not be able manage the wet weather peak flow rate. Therefore, this alternative was not considered further.

Storage

The excess flow from the wet weather events could be managed through temporary storage at the CRWRRF. This would require the construction of a seven-million-gallon storage facility. While this alternative is feasible, it is not optimal due to its significant cost of $91,000,000. Additionally, storage does not address the wet weather issue at its source or reduce the system's peak flow rates. As this alternative does not address the project need and is not cost-effective, it was not considered further.

Footing Drain Disconnection

During the studies to assess wet weather inflow and infiltration in the early 2000s, areas of Pontiac with unusually high flow rates were identified. These areas are likely private and considering approximately 85 percent of the housing in Pontiac were constructed before 1970, most of the houses in Pontiac likely have footing drains. Removing these drains could be an effective alternative to reduce the wet weather flow rates. However, implementing a footing drain disconnection program is unlikely to be very successful as there is not a city mandate to disconnect the footing drains, so the program would be voluntary only. It can also be a costly process. Considering these obstacles, this alternative was deemed not feasible and was not further considered.

Sewer Rehabilitation

Rehabilitating the existing sewer system would consist of lining the existing gravity mains and manholes. This would include the use of cured-in-place pipe (CIPP) lining to address the deteriorating gravity sewer mains. Gravity manholes would also take a similar approach by using CIPP lining to rehabilitate the manholes that have severe defects and/or structural damage. Manholes which require structural repair will have the necessary components replaced prior to CIPP lining to ensure the structural integrity of the manhole. Rehabilitation through lining is also less disruptive as it utilizes a trenchless method of installation and does not require open excavation to install. As this alternative was the only one considered feasible at this time, this alternative was selected.

Hybrid of Sewer Lining and Storage

Ultimately, a hybrid alternative of sewer rehabilitation through CIPP lining and storage may be required to address the system's long term wet weather flows. However, this alternative is not feasible at this time as additional evaluations are needed. Therefore, this alternative was not considered further at this juncture.

C. Selected Alternative

The CIPP sewer main and manhole lining (sewer rehabilitation) was chosen as the selected alternative because it is the only feasible alternative. The selected alternative will improve the reliability of the sanitary sewer system by rehabilitating approximately 46,000 linear feet of gravity sanitary sewer mains and repair/rehabilitation of approximately 267 manholes, in southeast Pontiac, south of M-59 and north of South Boulevard, east of Woodward Avenue, and west of Martin Luther King Junior Boulevard. The CIPP lining installation is trenchless and

should not require open cut excavation. This method will result in minimized costs, as well as reduced environmental and traffic impacts.

RELEVANT ENVIRONMENTAL FEATURES AND POTENTIAL IMPACTS

A. Water Quality Impacts

The construction involved with this project is limited to previously disturbed areas where the sanitary sewer system already exists. Therefore, no wetlands, floodplains, surface waters, or rivers within Pontiac will be adversely impacted by the project. The proposed project does not involve construction which is anticipated to impact ground water.

B. Construction Impacts

The proposed project involves trenchless installation of CIPP lining for gravity sewer mains and manholes. Construction will result in the typical short-term impacts associated with this type of project such as dust, noise, construction traffic, and temporary disruption to nearby residents and businesses. To prepare for the CIPP installation, the sewer mains and manholes will be thoroughly cleaned. The septage and sewage debris which result from cleaning operations will be discharged at the CRWRRF and/or OCWRC's septage receiving station, which will then be filtered, treated, and disinfected in accordance with the National Pollutant Discharge Elimination System permit.

Notifications will be provided to residences requesting that usage during CIPP lining be kept at a minimum for a short period of time to ensure proper installation. The OCWRC Office will post project updates on its website and coordinate with Pontiac to communicate construction schedules once they are provided by the contractor. Local doorhangers will be used during construction approximately one week prior to construction beginning along any given street.

C. Endangered Species and Historical Preservation

The proposed project is not anticipated to negatively impact sensitive natural features, wildlife, ecosystems, or the existing cultural and historic environment. According to the U.S. Fish and Wildlife Service's federal endangered and threatened wildlife and plants list, there are eight species in the area that are federally threatened, endangered, or threatened/endangered candidates. Pontiac also has 17 properties listed on the National Register of Historic Places. However, as construction will be utilizing trenchless technology and occurring in previously disturbed urban areas where no suitable habitat or cultural and historic resources are present, impacts are not expected.

D. Secondary Impacts

No significant adverse secondary impacts are anticipated for this project. This work will neither expand the sanitary sewer system service area nor increase capacity.

PUBLIC PARTICIPATION

The proposed project planning document and public meeting were advertised on April 7, 2023, on Oakland County's website. A public meeting was held on April 25, 2023. Following the public comment period, a formal resolution adopting the project planning document was passed on April 25, 2023.

REASONS FOR CONCLUDING NO SIGNIFICANT IMPACTS

The proposed project is expected to have a positive impact for Pontiac because it will improve the reliability of the sanitary sewer system for 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:

Sarah Peterson, Project Manager
Water Infrastructure Funding and Financing Section
Finance Division
Michigan Department of Environment, Great Lakes, and Energy
P.O. Box 30457
Lansing, Michigan 48909-7957
Telephone: (517) 438-3774
E-Mail: PetersonS12@Michigan.gov

Figure 1: Pontiac Sewage Disposal System Area

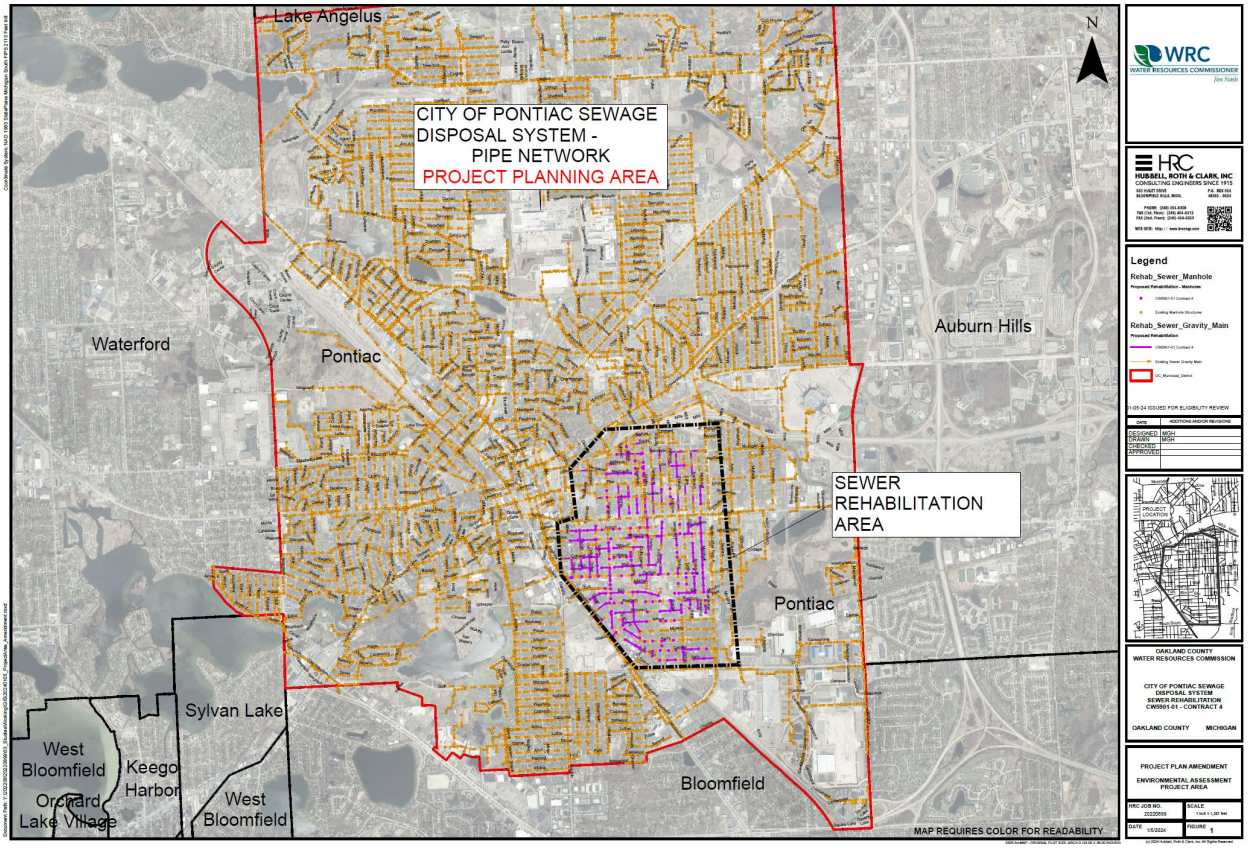

Figure 2: Project Locations