

STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

LANSING



April 24, 2020

TO: All Interested Citizens, Organizations, and Government Agencies

SUBJECT: FINDING OF NO SIGNIFICANT IMPACT

Great Lakes Water Authority

14 Mile Road Water Transmission Main Loop Project, Phases 1-2 Drinking Water State Revolving Fund Project Nos. 7461-01 and 7461-02

The purpose of this memorandum is to seek public comment on a preliminary decision by the Department of Environment, Great Lakes, and Energy (EGLE) that an Environmental Impact Statement is not required to implement recommendations presented in a drinking water project plan submitted by the above-referenced applicant. The decision by EGLE is based on its review of the proposed project using an array of federal and state criteria regarding the environment and public health, including 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. EGLE has determined that potential impacts to the natural and human environments either have been eliminated by changes in the project plan or will be mitigated with adherence to permit requirements. Minor construction impacts will be localized to the construction zones and will be temporary.

The attached Finding of No Significant Impact (FNSI) summarizes the proposed project and documents EGLE's preliminary decision. Comments supporting or disagreeing with this preliminary decision should be submitted to me at EGLE, Finance Division, Water Infrastructure Financing Section, 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. 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 to construct the proposed project.

Sincerely,

Kelly Green, Administrator

Helly ml

Water Infrastructure Financing Section

Finance Division 517-284-5433

Attachment

DEPARTMENT OF ENVIRONMENT, GREAT LAKES AND ENERGY (EGLE) Drinking Water State Revolving Fund (DWSRF) FINDING OF NO SIGNIFICANT IMPACT

14 MILE ROAD DRINKING WATER TRANSMISSION MAIN LOOP PROJECT, PHASES 1 & 2

April 2020

PROJECT HIGHLIGHTS

Applicant: Great Lakes Water Authority (GLWA)

Address: 735 Randolph Street

Detroit, Michigan 48226

Authorized Representative: Ms. Sue McCormick, GLWA Chief Executive Officer

Project Locations: Oakland County

Project Numbers: 7461-01 Reinforcing Main on 14 Mile Road

7461-02 New Loop between 14- and 8-Mile Roads

Construction Periods: Phase 1 Summer 2020 – Fall 2021

Phase 2 Summer 2021 – Fall/Winter 2023

Fiscal Year Loan Award Estimates: FY 2020 Phase 1 = \$6,200,000

FY 2021 Phase 2 = \$84,700,000

DESCRIPTION

The Great Lakes Water Authority (GLWA) seeks two loans at below-market rates to finance design and construction of a two-phase drinking water system project in Oakland County.

The overall 14 Mile Road Transmission Main Loop project scope is as follows:

- Phase 1 -- Approximately 1 mile of a newly constructed 24-inch-diameter water transmission main in Commerce Charter Township to be installed primarily along the north side of 14 Mile Road, starting near the Seeley Drain 1,250 feet west of the M-5 Highway, then traversing westward to its construction terminus 400 feet west of Decker Road (known as Novi Road south of 14 Mile Road), as shown in Figure 1.
- Phase 2 -- Approximately eight miles of a newly constructed 54-inch-diameter water transmission main between 14 Mile Road and 8 Mile Road in the cities of Novi and Farmington Hills, following the alignment shown in Figure 1.

Each buried pipeline will include a variety of appurtenances such as control valves, sectionalizing valves, blowoffs, and air release and vacuum valves. The construction also will include some utility relocations, grading, road paving, and restoration of road corridors that encompasses replacement of curbs and gutters, sidewalks, landscaping, and structures for surface stormwater drainage. Additionally, there will be connections to the 8 Mile Road Transmission Main (TM) and the 14 Mile Road TM at the Haggerty Pump Station (PS). The flow between the 8 Mile Road TM and 14 Mile Road TM will be controlled by valves located at the Haggerty PS. These valves will control the pressure and flow in the 14 Mile Loop TM.

Figure 1 shows the Phase 1 construction route on 14 Mile Road starting near the M-5 Highway and extending westward to Decker Road. Figure 1 also shows the Phase 2 construction route that, from north to south, generally goes from 14 Mile Road southward to 8 Mile Road by following the M-5 Highway corridor southward to 13 Mile Road, turning west to Meadowbrook Road, and turning south on Meadowbrook to 11 Mile Road, where it turns east on 11 Mile Road before turning south again as it follows the I-275 freeway right-of-way to 8 Mile Road.

OBJECTIVES

When both phases are completed, the new pipelines will create a loop in the drinking water transmission main system by interconnecting the 14 Mile Road TM with the 8 Mile Road TM, thereby providing redundancy and resiliency for both mains in all future failure scenarios. Both phases will ensure that the water supply system is sufficient to meet all system demands as specified in federal and state drinking water regulations.

When completed, Phase 1 will provide redundancy to protect the most vulnerable wholesale customer connections west of Haggerty PS. Because the existing 14 Mile TM is a single feed transmission system, the Phase 1 portion of the project will provide backup service to all critical service connections west of Haggerty PS so they can remain operational if the main were to break or be shut down for repairs.

Phase 2 will provide redundancy to both the 14 Mile Road TM system and 8 Mile Road TM system for all future failure scenarios. The new transmission main will provide redundancy for both transmission mains. If either transmission main is shutdown, the 14 Mile Loop TM can provide adequate water and pressure to the water system supplying water to 247,000 people. Without the 14 Mile Loop TM, these customers would not have adequate water and pressure in their water system if there were to be a power outage at Franklin PS, or if the 14 Mile Road TM were to be shutdown.

EXISTING SYSTEM AND PROJECT NEED

The combined population of water customers served by the 14 Mile Road and 8 Mile Road transmission systems is roughly 370,000, described as follows:

- The 14 Mile Road TM supplies water to all or portions of six Oakland County communities as follows: city of Novi, city of Farmington Hills, West Bloomfield Township, Commerce Charter Township, city of Walled Lake, and city of Wixom. The estimated combined population served by this transmission main is 275.000.
- The 8 Mile Road TM supplies water to portions of the cities of Novi, Farmington Hills, Livonia, and Northville. The estimated combined population served by this transmission main is 97,000.

The remainder of water customers in these municipalities are served by either private wells or by other GLWA transmission systems. The total population of the eight municipalities,

regardless of water source and water service area, is projected to increase from approximately 375,000 currently to an estimated 388,000 in the year 2040. The two DWSRF loan projects will benefit two-thirds of this regional total.

14 Mile Road Transmission Main

The northwestern edge of GLWA's regional drinking water system in Oakland County currently includes the Franklin PS that provides pressure and flow for the 14 Mile Road TM. This 11-mile-long water conveyance pipeline begins at the Franklin PS (Figure 1), located just north of 14 Mile Road on Inkster Road. The Franklin PS is in the extreme southeast corner of West Bloomfield Township.

From this pipeline origin, the 14 Mile TM traverses westward on 14 Mile Road to the Haggerty PS. The Haggerty PS is an as-needed booster station with a 10 million gallons (MG) reservoir located near the 14 Mile Road and Haggerty Road intersection in the extreme northeast corner of the city of Novi.

The transmission main continues further westward on 14 Mile Road to its terminus in the middle of Walled Lake. As noted in the previous section, the 14 Mile TM provides local service connections to all six above-named municipalities, exclusive of the Village of Franklin.

The Haggerty PS operates only during periods of high water supply demand, but with the connection to the proposed 14 Mile Loop TM, it has pumping capacity to provide an emergency supply of up to 28 million gallons per day in the event of a transmission main break between the Franklin and Haggerty stations.

The 14 Mile Road TM was constructed circa 1973 of prestressed concrete cylinder pipe (PCCP), which has been compromised by corrosion and faulty construction materials; consequently, it is subject to catastrophic failure. The pipeline experienced such a failure on October 23, 2017, when a temporary power failure caused an associated power disruption in the water system. This resulted in a pressure surge when the pumps stopped operating. The pressure surge caused a catastrophic pipeline failure on the portion of the 48-inch-diameter PCCP on 14 Mile Road between Drake and Farmington Roads, along the boundary of the city of Farmington Hills and West Bloomfield Township. See Figure 1 for the general location. The break caused a sudden drop in system pressure resulting in varying impacts to 14 local suburban communities (the six named above plus eight more) whose local water distribution systems were indirectly affected by failures in the 14 Mile TM. These impacts included low pressures, inadequate water supply, and boil water advisories. Subsequent hydraulic modeling concluded that the local agencies serviced by the 14 Mile Road TM system would be unable to meet the EGLE required supply and pressure requirements under similar future emergency conditions involving the 14 Mile Road TM.

Subsequent studies revealed that the agencies supplied by the 14 Mile Road pipeline are vulnerable to similar failures of flow and pressure (as experienced in 2017) because the entire pipeline is constructed of compromised PCCP. This makes the entire pipeline vulnerable to similar catastrophic failures. In addition, the 14 Mile system is a single feed transmission system, so it is has no redundancy. The pipeline would be unable to deliver water if the Franklin PS were to be out of service, because all the flow in the 14 Mile Road TM is fed solely by the Franklin PS (and not by Haggerty which has only a small reservoir and is used primarily as a booster pump station). Consequently, if the pipeline itself were to be out of service, or if the Franklin PS went out of service, then approximately 150,000 water users whose distribution connections are located west of Franklin PS could not be provided with an adequate supply of safe, potable water. The impacted communities would be located in Commerce Charter

Township, city of Walled Lake, West Bloomfield Township, city of Farmington Hills, city of Novi, and city of Wixom.

8 Mile Road Transmission Main

The West Service Center PS and Newburgh PS in Oakland County provide pressure and flow for the 8 Mile Road TM. The 8 Mile TM begins at the West Service Center (near Inkster Road) and extends westward to its terminus in the city of Northville.

This pipe is constructed of compromised PCCP and is vulnerable to catastrophic failure from pressure surges. However, the 8 Mile Road TM is part of a looped system, and so it can maintain service if there were to be a failure of the 8 Mile TM.

ALTERNATIVES ANALYSIS AND SELECTION

In 2017, GLWA evaluated four redundancy alternatives for the 14 Mile Road transmission system. Alternative 3 was recommended as the preferred alternative because it was shown to be the lowest-cost alternative possessing the required and best outcomes for redundancy and resiliency. Alternative 3 consists of two pipelines, summarized previously on Page 2 of this document. A route study conducted in 2019 determined the best alignments within the original planning study area.

Upon completion, Phase 2 will connect the 8 Mile Road TM (which receives flow and pressure from Newburgh PS) and the 14 Mile TM at the Haggerty PS. In addition, the 14 Mile Loop TM will also connect to the Haggerty PS reservoir fill line. Currently, the Haggerty 10-MG above-ground storage reservoir is filled daily through a reservoir fill valve with water supplied from the Franklin station. The current operation wastes energy by burning approximately 90 pounds per square inch of pressure through the reservoir fill valve for each gallon delivered to the Haggerty reservoir. The new Phase 2 transmission main will increase energy efficiency by enabling delivery of flows to Haggerty reservoir from the Newburgh station at lower pressures, which will significantly reduce the energy loss through the reservoir fill valve for each gallon delivered to the Haggerty reservoir.

Phase 1 is primarily located within Commerce Charter Township along its boundary with the city of Novi. Minor work within the City of Novi will involve installation of the connection between the Phase 1 pipe and the 14 Mile Road TM. Work near Decker Road will be in the southeast edge of the city of Walled Lake.

South of 14 Mile Road and southward to 8 Mile Road, Haggerty Road forms the boundary between Novi to the west and Farmington Hills to the east (Figure 1). Northern portions of the Phase 2 work between 14 Mile Road and 11 Mile Road will occur within the Novi city limits, whereas southern portions south of the I-275 interchange will lie just inside the western edge of the Farmington Hills city limits.

IMPACTS AND MITIGATION

Most construction activity will occur within and alongside road rights-of-way in heavily developed urban and suburban areas with residential, commercial, and industrial land uses. The majority of underground water pipeline will be installed using the open-cut method of construction. Tunnels will be used to cross under I-696 (near Meadowbrook Road), the M-5 highway (near 14 Mile Road), and under the I-275 and 8 Mile Road interchange. Tunnels or jack and bore construction methods will be used to cross under 10 Mile Road, 12 Mile Road, River Avenue and Haggerty Road. In Phase 1, horizontal directional drilling will be used to cross under the

Seeley Drain. Recommendations of specific construction methods will be developed during design.

Traffic, Road Corridors, and Access

The greatest site-specific and collective disruptions will be to traffic flow, sidewalk accessibility, and property accessibility (residential and commercial) within the construction zones and construction staging areas. Major traffic impacts are expected in high-traffic streets and intersections. The route selected will help minimize traffic impacts because half the alignment is adjacent to the I-275 and M-5 highways and not located in major city streets.

Properties and businesses outside but near the construction zones will likewise experience impacts due to traffic delays and increased presence of construction vehicles. GLWA will develop detailed road closure staging plans to maintain access. Special accommodations may be required for certain residences, churches, and businesses that are most notably affected.

During Phase 1, the parking area to the Robert H. Long Nature Park on 14 Mile Road will be temporarily closed during construction. Also, during Phase 1, access to some street intersections in the construction zone west of M-5 will be temporarily closed or rerouted such as (moving east to west) Welch Road, Winslow Circle, Cherry Grove Lane, and Crestview Boulevard. 14 Mile Road west of Decker also will be temporarily closed while the connection of the new pipe to 14 Mile Road TM is being completed. Businesses in or near the construction zones likewise will experience impacts due to traffic delays and increased presence of construction vehicles.

During Phase 2, GLWA will work closely with Michigan Department of Transportation (MDOT), the Oakland County Road Commission, city of Farmington Hills, and city of Novi to derive the best possible traffic control plans for the impacted areas of the M-5 Freeway corridor, 13 Mile Road, Meadowbrook Road, 11 Mile Road, and I-275 Freeway corridor. Although the public and private commercial properties affected directly or indirectly by Phase 2 construction are too numerous to list here, some examples of the larger organizations anticipated to experience major impacts from 14 Mile southward include: Brightmoor Christian Church, Fox Run Senior Living Community, Meadowbrook Elementary School, Crosspoint Meadows Church, MSU Tollgate Farm, Beacon Hills Condominiums, South University Novi, Trane Air Force Base, Meadowbrook Corporate Park, Walsh College, Dale Carnegie Training School, Michigan Milk Producers Association, FedEx Shipping Center, Child Health Associates, and Highland Hills Estates.

Businesses south of the I-275/96/696 interchange having access from Haggerty Road should not be as significantly impacted by Phase 2 because construction will be within the MDOT right-of-way adjacent to the I-275 freeway. This construction will be behind the businesses and not in Haggerty Road. Haggerty Road is not anticipated to be closed or significantly impacted by the construction.

In the southernmost zone of the project, the areas near Haggerty Road and 8 Mile Road are highly commercialized and extremely congested, and major traffic impacts can be expected at the 8 Mile Road and I-275 interchange during construction of the connection to the 8 Mile Road TM. The Hilltop Church of Nazarene will have some impacts when construction is being done behind the church.

The M-5 Metro Trail, a 2-mile-long paved biking trail also used for walking and jogging, runs for 2 miles paralleling the west side of M-5 in Commerce Charter Township and the city of Novi. A one-mile portion of this trail between 14 Mile Road and 13 Mile Road will be affected by Phase 2

construction in this location. Access to the path will be closed temporarily at 13 Mile Road and 14 Mile Road during construction.

The I-257 Metro Trail, a 26-mile-long paved biking trail also used for walking and jogging, traverses through Oakland and Wayne Counties. During Phase 2 construction, street access points in the roughly 2.5-mile-long Northville portion of the trail between Meadowbrook Road and 8 Mile Road will be temporarily closed. The path will be closed until the pipe has been installed and the bike path replaced.

For both phases, construction staging areas will be located adjacent to the construction corridor on private property. The properties with the highest impact due to noise during both phases of construction are Griffin's Neighborhood Auto Clinic, Tom Holzer Ford, Weingartz, Suburban Honda, Walsh College and FedEx.

Land Acquisition or Easements

Pre-design analysis did not identify any property or easement acquisition locations along the proposed work zones for Phase 1. Permanent and temporary easements will be required for Phase 2 construction. The temporary easements are required to install the pipe, and a permanent easement is required so the pipe can be installed and accessed after construction. Temporary and permanent easements are required near Walsh College and adjacent to Suburban Honda. The other locations where temporary easement is required are: access to the bike bath at 10 Mile Road (from Tom Holzer Ford) and at Grand River Avenue (from Weingartz). A permanent easement is also required from MDOT, Walled Lake Consolidated Schools, and ITC Holdings (an electrical power provider).

Permits

Each phase of pipeline construction will require various permits from federal, state, county, and city agencies. Permitting agencies include EGLE as well as the following: MDOT, Oakland County Water Resource Commissioner, Road Commission of Oakland County, city of Novi, city of Farmington Hills, and ITC Holdings. Other permit applications will be submitted after the design is sufficiently advanced to enable complete, up-to-date applications. Adherence to permit requirements, combined with sound construction practices, will help mitigate impacts, which will be localized to construction zones and will be temporary. Only the environmental permits from EGLE are described below.

During Phase 1, an EGLE / United States Army Corps of Engineers Joint Permit Application (JPA) for Minor Projects for Utility Line Activities is required for work in and near the Seeley Drain and in a small wetland near Decker Road. Joint Permit No. WRP021310 v.1 dated March 6, 2020, authorizes the Seeley Drain crossing under Part 301 Inland Lakes and Streams of Public Act 451, as amended, and a wetland crossing under Part 303 Wetlands Protection, of the same statute. The drain crossing will be accomplished by directional drilling and bore, and the wetland crossing will be completed by permitted open trenching techniques.

For Phase 2, a JPA for impacts to inland streams and wetlands will be required, and also possibly a city of Novi wetland evaluation application. Minor project permitting will be needed for potential cut and fill impacts resulting from open trenching placement of the transmission waterline near wetlands or minor water body crossings. Trenchless methods will be employed for longer or more impactful crossings, but will still require permitting. A pedestrian pathway will also be rebuilt and expanded in width along the southern half of the corridor. This may impact wetlands in a few locations and is currently being evaluated during design. This activity would be covered under a General Permit.

Because the area of disturbance will exceed 5 acres for this project, it will require the submittal of a Notice of Coverage from EGLE in conjunction with the Part 91 Soil Erosion and Sedimentation Control permits from the city of Novi, city of Farmington Hills, and MDOT. During future construction, if contaminated soils, groundwater, or other materials are encountered, these will be properly handled according to state regulations and contract specifications

Some construction-zone dewatering is anticipated so that groundwater is held below all excavations. It is possible that pumping for dewatering may be significant in some areas of Phase 1 and 2. It is also possible that the pumping rate may exceed 70 gallons per minute. If this rate is exceeded, the withdrawal may qualify as a large-quantity withdrawal as defined by EGLE regulatory requirements, and will require follow-up with EGLE.

If dewatering discharges to surface waterbodies are anticipated, any such discharge would require the Contractor to obtain a permit from EGLE under the authority of the National Pollutant Discharge Elimination System. If dewatered water is discharged into a local sanitary sewer, a permit will be obtained from the owner of the sewer.

Drinking Water and Sanitary Sewer Services

Distribution water lines and gravity sanitary sewers affected by construction of the proposed transmission mains will be supported and kept in-place as much as possible; however, in Phase 2, at least one relocation of a water line and sewer main will be necessary. During switchovers between water pipes, customers in the affected area in the city of Novi may experience temporary disruptions to their water service, and possible temporary discoloration of their tap water or brief water pressures below the minimum specified in the municipal service contract. Depending on the expected duration of service disruptions, the contractor may be required to temporarily provide above-grade water services. Any disruptions longer than 8 to 12 hours typically require temporary services to be established during construction.

During construction of Phase 2, GLWA may encounter lead or galvanized water service lines. If lines containing lead or galvanized are encountered, they will be fully replaced in the public street right-of-way, as well as on the private side, up to the customer's water meter. GLWA and the city of Novi will coordinate this type of work according to which agency has jurisdiction of the affected property.

GLWA may be distributing water filters as result of the transmission and water main construction, pending city of Novi construction requirements. Other requirements may include advising customers to flush their lines after water service is restored. If city of Novi water mains are involved, GLWA may include contract provisions for distribution of point-of-use filters. Customers will be given the name and phone number of a contact person for any construction-related concerns.

Residents in the construction zones of Phase 2 may experience brief interruptions in sanitary sewer service if sewer pipes must be relocated due to utility conflicts or to otherwise enable transmission main construction. Construction specifications will identify sewer bypass pumping and other methods to ensure compliance with all environmental regulations and local ordinances.

Species

Pre-design assessments involving consultations with staff of EGLE Water Resources Division, the Michigan Natural Features Inventory, Michigan Department of Natural Resources, and United States Fish and Wildlife Service (USFWS) concluded it is unlikely that negative impacts will occur to threatened or endangered species, environmentally sensitive areas, or critical

habitats. Pipeline construction primarily will occur in and near already-developed urban street corridors that are situated away from historically documented occurrences of protected species.

The Phase 1 underground crossings of Seeley Drain should not impact stream habitat for the state-endangered Redside dace, which was last documented in the watercourse in 2012, but not in or near the proposed construction zones. GLWA and its contractor will take special care to ensure soil erosion and sedimentation controls are in place for the stream crossings, which have been permitted by EGLE under Joint Permit No. WRP021310 v.1 dated March 6, 2020.

The future Phase 2 pipeline alignment will pass very close to a known stand of the state-threatened Pumpkin ash located south of 11 Mile Road on the east side of the large wetland complex between Meadowbrook Road and Seeley Road. Because the pipe installation will occur on the north side of the street, away from the wetland, there should be no direct impacts. Additionally, there may be other potential impacts to wetlands and small streams along the Phase 2 proposed route. As of April 2020, GLWA is arranging a preapplication meeting with EGLE, to be followed in Summer 2020 by a Joint Permit application for Phase 2. EGLE staff experts will carefully delineate and assess potential Phase 2 impacts involving wetlands and inland streams in addition to associated species.

For both phases, some trees along streets may need to be removed during certain portions of pipeline construction, but no large vegetated expanses are expected to be involved. Post-construction mitigation of tree removals will conform to requirements of authorities having jurisdiction.

Although there are no known hibernation, roosting, or nesting sites for the Indiana bat or Northern long-eared bat in the proposed construction zones, the limited tree removals should be conducted between October 1 and March 31 whenever possible to reduce the likelihood of interference with these protected species, if present. Spring and summer habitat for the Indiana bat may be present near proposed route between 12 Mile Road and 14 Mile Road where the region is less urbanized, and will be assessed by EGLE staff in Summer 2020 during the Joint Permit application review for Phase 2. If any unexpected wildlife concerns become evident during construction of either phase, GLWA will contact EGLE, the Michigan Department of Natural Resources, and the federal USFWS, as appropriate.

Archaeological and Historical

In accordance with the portion of the National Historic Preservation Act concerned with federally funded projects, GLWA submitted a Section 106 application to the State Historic Preservation Office (SHPO) in April 2019. GLWA then submitted a revision in November 2019 that included the revised, final route for Phase 2. On April 1, 2020, the SHPO determined that no historic or archaeological sites will be affected by the two phases of the project. However, it should be noted that one underground archaeological site is near the transmission main path just southwest of Haggerty Road and 14 Mile Road, where prehistoric bones were discovered during prior construction in 2003. The SHPO indicated that although the project is unlikely to disturb any remains or materials related to this site, GLWA must stop work at the location and notify SHPO immediately if artifacts, structural remains, or other archaeological materials are discovered, and must also contact law enforcement if the materials include human bones. Additionally, it should be noted that although three above-ground historic sites are in the vicinity of adjacent construction activities, excavations won't occur on these properties and SHPO determined there will be no impact.

In 2019, GLWA notified Tribal Historic Preservation Officers about the geographic zone containing all possible alignments for the proposed transmission main. None of the officers identified known sites or expressed specific concerns. During construction, if any artifacts or bones are discovered, GLWA will issue a temporary stop-work order and contact SHPO and municipal agencies as applicable.

COSTS

When Phases 1 and 2 are combined, the pre-design, pre-construction estimated debt burden totals \$90,900,000. This debt burden distributed across all GLWA customer accounts (approximately 1.1 million) is equivalent to \$5.05 per household per year for the typical household. However, the actual rate increase attributable to the two DWSRF loans will not be determined by GLWA until actual construction bid costs are awarded for the proposed work, which will occur in phases between EGLE's FY 2021 and FY 2022. GLWA only determines the wholesale water rates charged to its 125 wholesale customers in the 7-county service area, excluding Genesee County. Local governing bodies will address any necessary rate changes within their jurisdictions.

Although it is anticipated that all work will be eligible for DWSRF loan financing, any potential non-eligible costs or costs that GLWA desires to exclude from the DWSRF loans will be funded either by cash on hand and/or by revenue bonds.

PUBLIC PARTICIPATION

After the state-required public notice and review period for the DWSRF Project Plan, the GLWA Board of Directors held a public hearing on April 24, 2019, at 2 p.m., in the Water Board Building in downtown Detroit. An informational presentation was followed by a few questions and comments. The hearing concluded with the adoption of the plan by resolution.

In 2019, GLWA conducted several outreach and coordination meetings with the cities of Novi, Commerce Charter Township, and Farmington Hills during the course of the 14 Mile Road Loop route study. The cities of Novi and Farmington Hills were introduced to the project in March 2019, given an update in September of 2019 at the end of the route study, and their city council was briefed in October 2019 (Novi) and March 2020 (Farmington Hills). Other stakeholders, such as Road Commission for Oakland County, MDOT, and ITC Holdings have been briefed several times and they have been invited to review design submittals.

In 2020 and beyond, the next steps will involve local neighborhood public engagement. This includes meetings with city officials and briefings to the Novi and Farmington Hills city councils. Public participation is a key component of the EGLE project planning process, especially given the far-reaching geographical scope of the proposed water transmission pipelines.

REASONS FOR CONCLUDING NO SIGNIFICANT IMPACTS

Phase 1 of the project will have no significant adverse direct, indirect, or cumulative effects on socioeconomic, cultural, or environmental features. Phase 2 likewise is not expected to have significant adverse effects, but EGLE and SHPO final determinations for wetlands, inland streams, associated species, and archaeological/historical resources will be required prior to Phase 2 commencement of construction in Summer 2021.

For both phases, construction impacts will be localized to the construction zones and will be temporary. These impacts can be mitigated with sound construction practices, adherence to permit requirements, and coordination with property owners and with governmental agencies having jurisdiction over aspects of the work zones.

Questions regarding this Finding of No Significant Impact should be directed to:

Ms. Kelly Green, Administrator Water Infrastructure Financing Section Finance Division Michigan Department of Environment, Great Lakes, and Energy P.O. Box 30457 Lansing, Michigan 48909-7957 Telephone: 517-284-5433

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