



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

May 25, 2022

TO: All Interested Citizens, Organizations, and Government Agencies

SUBJECT: **DRINKING WATER STATE REVOLVING FUND (DWSRF)
CATEGORICAL EXCLUSION
Republic Township, Marquette County
DWSRF Project Number: 7551-01**

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:

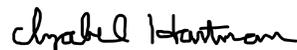
Ms. Angela Yu, Project Manager
Water Infrastructure Financing Section
Finance Division
Michigan Department of Environment, Great Lakes, and Energy
P.O. Box 30457
Lansing, Michigan 48909-7957

EFFECTIVE DATE OF THE DEQ 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. Angela Yu, project manager, Water Infrastructure Financing Section, Finance Division, by phone at 517-599-5487, by email at YuA@michigan.gov, or by mail at EGLE, P.O. Box 30457, Lansing, Michigan, 48909-7957; or you may contact me at the aforementioned address. Your interest in this process is greatly appreciated.

Sincerely,



Izabel Hartman, Unit Supervisor
Water Infrastructure Financing Section
Finance Division
517-284-5433

Attachment

DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
Drinking Water State Revolving Fund
Republic Township, Marquette County
Categorical Exclusion for Lead Service Line Replacement Project
May 2022

PROJECT IDENTIFICATION

Applicant: Republic Township, Marquette County

Address: 279 Kloman Avenue, P.O. Box 338
Republic, Michigan 49879

Authorized Representative: James Brennan, Township Supervisor

Project Number: 7551-01

PROJECT SUMMARY

Republic Township (Republic) is in southwest Marquette County, and contains two population centers along the Michigamme River, North and South Republic, which are approximately two miles apart. The two areas are separated by the former Republic Mine, which was closed in the 1980s. According to the United States Census, Republic had an estimated population of 994 persons in 2020. Future population is expected to decline based on countywide projections completed by the Lake Superior Community Partnership.

Republic is applying for a Drinking Water State Revolving Fund (DWSRF) loan administered by the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to assist with financing the replacement of lead service lines (LSLs) in North Republic (see Figure 1). As a disadvantaged community undertaking lead service line replacement (LSLR), Republic is eligible to receive Water Infrastructure Fund Transfer Act (WIFTA) funding through the DWSRF loan. WIFTA funding can provide up to 100 percent principal forgiveness for LSLR construction activities. This project may be completed in conjunction with a United States Department of Agriculture and Rural Development (USDA-RD) water main replacement project which includes replacement of public side LSLs.

The total estimated cost for LSLR is \$300,000 regardless of concurrence with the USDA-RD project. Republic anticipates receiving WIFTA funding that will cover all associated LSLR construction costs. The remainder of the project cost, which includes project design, investigation of service lines outside the proposed project area, construction engineering, and administrative expenses, will be paid for by Republic funds. As a result, the LSLR project financed through the DWSRF will occur with no rate impact to system users.

EXISTING SYSTEM AND NEED FOR THE PROJECT

Republic owns, operates, and maintains its water distribution and treatment system, which services the populated centers of the township. The water treatment facility is located between north and south Republic and draws from groundwater for treatment.

The water mains in Republic consist of cast iron, asbestos cement, and ductile iron pipes varying in age. The distribution system has undergone replacement twice, most recently in

2013, where portions of the system were replaced with ductile iron pipes. Most of the system has not been upgraded and dates as far back as 1945. Pipe sizes range from two inch to 10-inch diameter. The proposed USDA-RD project replaces the cast iron portions of the distribution system that were installed in 1945.

In 2018, Michigan's Lead and Copper Rule (LCR) was revised. The LCR now requires replacement of all lead service lines, and galvanized lines that either currently or historically have been connected to lead, on both public and private property since they pose a health threat. According to Republic's preliminary Distribution System Materials Inventory submitted to EGLE, the drinking water distribution system supplies 335 water services. While there are no identified or known lead services, the system has 36 service lines of unknown materials, likely to be LSLs. The DWSRF loan will cover the construction costs associated with the private side LSLRs if completed with the USDA-RD water main replacement project. USDA-RD funds would cover costs associated with public side LSLR. If the LSLRs are not completed at the same time as the water main replacement, full LSLR will be completed (both public and private portions of the property) utilizing the DWSRF.

PROPOSED PROJECT

Republic is proposing to replace approximately 15 LSLs as part of this project. Since Republic has service lines of unknown materials, investigations will occur prior to any replacements. Water service line materials will be confirmed by Republic through these investigations prior to any construction work. The service line will only be replaced if it is identified and confirmed as an LSL. Service line investigations will primarily occur in North Republic (see Figure 1), along Kloman Avenue between Old M-995 (County Road LK) and 6th Street. Additional investigations will occur along 2nd Street between 4th and 3rd Streets.

Coordination by Republic with property owners for potential water service replacements will occur prior to work proceeding, likely during the design phase. Republic plans to issue notices through mailers and direct contact in the project area. Republic and the consulting engineer will also host public meetings and advertise the project on the township website. If an LSL is discovered during service line inspections, a follow-up conversation will be initiated with the property owner explaining the need, schedule, and impact of the replacement. Water service line investigations are expected to begin in summer 2022, with LSLR occurring shortly thereafter. Open cut methods will be used to remove and replace the LSL with copper lines. Replacement will occur on both publicly- and privately-owned sides as partial replacements are prohibited by the LCR.

Republic considered three alternatives to service line replacement: no action, continued maintenance and as-needed upgrades, and replacement. The only alternative that meets project goals and requirements of the LCR is replacement (LSLR). As a result, the proposed project is the only feasible alternative that adequately addresses the necessary compliance with the LCR.

EXISTING ENVIRONMENT AND POTENTIAL ENVIRONMENTAL IMPACTS

Project construction will only take place in the existing rights-of-way or utility easements, both of which have been previously disturbed and are used for roads and utilities. LSLRs on private property will impact manicured lawns and are expected to be restored to original condition. While the Michigan River flows through Republic, no project work will occur on or near the river or associated wetlands. No adverse impacts to environmental, historical, cultural, or threatened and endangered species are expected because work is isolated to developed rights-of-way and outside of any critical areas.

Construction impacts are expected to be minimal. Typical construction disturbances, such as noise, dust, and minor traffic changes will occur. Construction will take place on residential streets within Republic and LSLR on private residential property.

PUBLIC PARTICIPATION

Republic held a public hearing on July 1, 2021, to discuss the proposed project plan. The hearing was advertised on June 4, 2021, in *The Mining Journal*. There were no questions or comments from the public regarding the project. A resolution adopting the project plan and implementation of the selected alternative was unanimously approved by Republic's board on July 12, 2021.

RATIONALE FOR CATEGORICAL EXCLUSION

The proposed project will remove many of the existing known lead and galvanized water services within the Republic drinking water distribution system. EGLE staff have carefully reviewed the proposed LSLR portion of the proposed project and related documents and determined no significant adverse impacts are anticipated.

Questions regarding this Categorical Exclusion should be directed to:

Angela Yu, 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: 517-599-5487
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