



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



C. HEIDI GREETHER  
DIRECTOR

February 9, 2018

TO: All Interested Citizens, Organizations, and Government Agencies

SUBJECT: FINDING OF NO SIGNIFICANT IMPACT  
**City of Flint, Genesee County**  
**Service Line Replacement**  
**Drinking Water Revolving Fund Project No. 7421-01**

The purpose of this notice is to seek public input and comment on a preliminary decision by the Michigan Department of Environmental Quality (DEQ) that an Environmental Impact Statement (EIS) is not required to implement recommendations discussed in the attached Environmental Assessment Amendment 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 the DEQ to evaluate all environmental implications of a proposed water supply project. The DEQ 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. The DEQ has prepared the attached Environmental Assessment Amendment 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 Amendment.

#### **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 [www.michigan.gov/cleanwaterrevolvingfund](http://www.michigan.gov/cleanwaterrevolvingfund) under "Related Links." The Environmental Assessment Amendment 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.

Finding of No Significant Impact  
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### **HOW DO I SUBMIT COMMENTS?**

Any comments supporting or disagreeing with this preliminary decision should be submitted to me at DEQ, Drinking Water and Municipal Assistance Division, Revolving Loan Section, Constitution Hall, P.O. Box 30817, Lansing, Michigan 48909-8311. 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 the DEQ should be brought to our attention. If you have any questions, please contact Mr. Eric Pocan, the project manager, at 517-284-5416, or you may contact me. Your interest in this process and the environment is appreciated.

Sincerely,



Sonya T. Butler, Section Manager  
Revolving Loan Section  
Drinking Water and Municipal Assistance Division  
517-284-5433

Attachments

**DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**City of Flint, Genesee County**  
**Service Line Replacement**  
**Drinking Water Revolving Fund (DWRF)**  
**Environmental Assessment Amendment**  
**February 2018**

**Applicant:** City of Flint, Genesee County

**Authorized Representative:** Mr. Hughey Newsome, Chief Financial Officer

**Address:** 1101 South Saginaw Street  
Flint, Michigan 48502

**Project No:** 7421-01

**I. RATIONALE FOR ENVIRONMENTAL ASSESSMENT AMENDMENT**

This document amends the Environmental Assessment, which was published for review and comment on March 8, 2017, and the Environmental Assessment Supplement (EAS) published for review and comment on May 8, 2017, for the above-referenced DWRF project. The original scope of work for this DWRF project consisted of replacement of up to 6,000 residential service lines constructed of lead or galvanized pipe with new copper pipe and hydro vacuum excavation (hydrovac) at approximately 4,500 homes to identify construction material of service lines within 10 zones located throughout the city of Flint. The EAS was needed to expand the construction activities outside of the 10 zones to cover the entire city limits of Flint. However, restrictions were put on an area referred to as the Archeological Zone. The additional information, which prompted this Environmental Assessment Amendment, relates to expanding the number of addresses identified for hydrovac and to include hydrovac work in the Archeological Zone.

**II. PROJECT DISCUSSION**

In May 2017, Flint accepted a \$40 million loan for its Phase 4 service line replacement project. This loan was made available by the Water Infrastructure Improvements for the Nation (WIIN) Act through the DWRF with 100-percent principal forgiveness. Additional funding was also secured for eligible homes from the U.S. Department of Health and Human Services (DHHS), Children's Health Insurance Program (CHIP). CHIP covers lead abatement in Medicaid-eligible homes. Service line replacement work in Phase 4 was completed in January 2018; approximately 5,360 residential service lines constructed of lead or galvanized pipe were replaced, and approximately 1,255 residential service lines with previously unknown material have been identified as being constructed of copper. In addition, 4,656 addresses were investigated with hydrovac, which found 1,070 were constructed of copper. The work left to be completed from the original project plan is restoration activities at 1,370 addresses. Flint expects the remaining restoration work to be completed within 90 days when the weather allows, and construction crews can begin work in the spring.

Now that replacement and hydrovac activities proposed in Phase 4 have concluded and only restoration remains, Flint has estimated that it is approximately \$2.5 million under loan budget of \$40 million. This, in part, is a result of over \$4 million in completed replacement and restoration activities being eligible for reimbursement through the DHHS CHIP grant. Flint has requested to add an additional 6,000 addresses to the hydrovac work plan at an estimated cost of \$2 million. The hydrovac activities are planned to begin on March 12, 2018. The additional addresses targeted for hydrovac will be part of the Phase 5 service line replacement program estimated to begin in April 2018. The advantage of completing hydrovac exploration ahead of the Phase 5 replacement project is that Flint will save time and money avoiding addresses where replacement is not necessary. As a result, a greater number of service lines constructed of lead or galvanized pipe will be replaced by the end of Phase 5 in December 2018. If additional funds remain in the \$40 million WIIN loan after restoration is complete, Flint may add more addresses to the hydrovac work plan.

### **III. SUMMARY DESCRIPTION OF PROPOSED NEW LOCATIONS**

Flint is now focusing on completing hydrovac in the areas of the city where service line replacement still needs to occur. It is estimated that approximately 9,000 more addresses will need to be investigated to confirm if its water service line is constructed of copper or if its lead or galvanized service line needs replacement. The attached map shows the boundaries of the Wards in Flint, areas identified as Groups 1-5 that still need investigation and phases where service line replacement has been completed. An area of environmental concern first described in the EAS as the Archeological Zone is in Group 1, Ward 5 of the city. The Archeological Zone is an area of the city bordered by Hamilton Avenue to the north, Court Street to the south, Saginaw Street to the east, and Dupont Street to the west. The reason this area needs additional review before hydrovac work can begin is that several early Native American sites have been recorded in Flint, including early burials and cemeteries, and Native American ancestral remains have been previously discovered in this area.

### **IV. ENVIRONMENTAL IMPACTS**

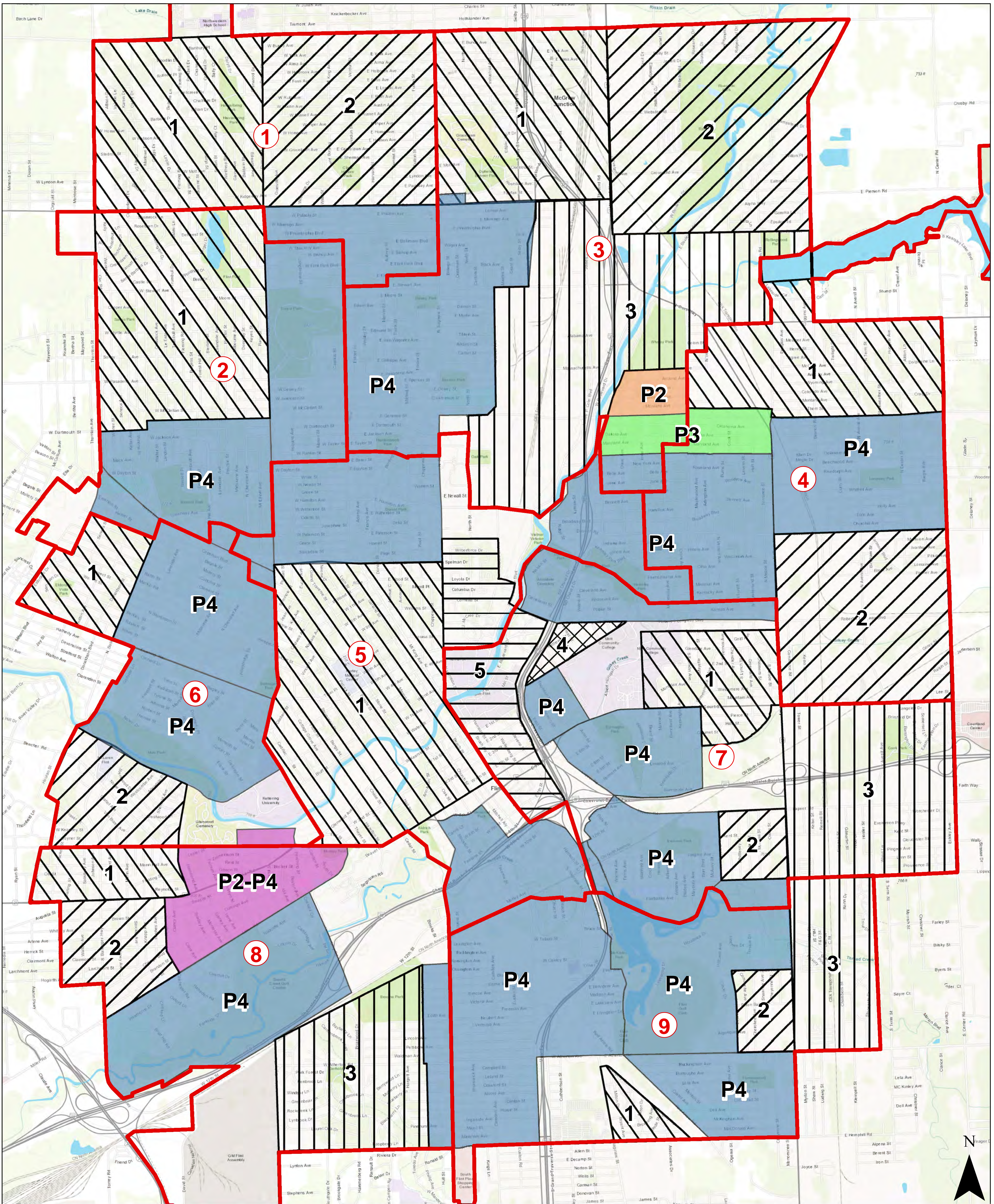
The EAS explained that any construction activities added to the scope of the project would have to be reviewed by the State Historic Preservation Office (SHPO), and depending on the location of the proposed construction additional oversight may be required. SHPO has indicated a professional archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (48 FR 44738-9) in archaeology will be needed to monitor the hydrovac work at addresses within an area of the Archeological Zone bounded by West 5<sup>th</sup> Avenue on the north, Stevenson Street on the west, West Kearsley Street on the south, and Martin Luther King/Saginaw Street on the east. SHPO also noted that it may be particularly useful to conduct hydrovac work outside of this area first so that the work within this area takes place later in the winter or in the spring. The process of excavating with the hydrovac may need to be slowed somewhat in order to allow the archaeologist to get a good view of the hole as it progresses, and in the process, have an opportunity to recognize any cultural or human remains that may be exposed. If such remains are found, the hydrovac work must stop to give the archaeologist time to examine the find and take steps to inform the appropriate parties to insure that the situation is handled properly.

V. **REASONS FOR CONCLUDING NO SIGNIFICANT IMPACT**

The areas proposed for hydrovac are being expanded; however, the loan amount and construction methods remain the same. The proposed project will work towards providing Flint a reliable distribution system. The short-term, minor construction impacts are outweighed by the improvements to Flint's water distribution system and the reduced threat to public health.


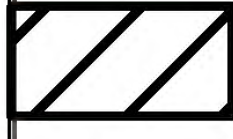
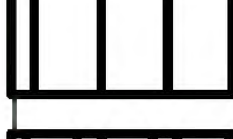


Questions regarding this Environmental Assessment Amendment should be directed to:

Ms. Sonya Butler, Section Manager  
Revolving Loan Section  
Drinking Water and Municipal Assistance Division  
P.O. Box 30817  
Lansing, Michigan 48909-8311  
Telephone: 517-284-5433  
E-Mail: butlers2@michigan.gov

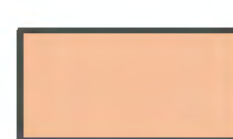

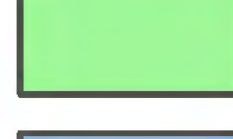




## Legend

### Ward Groups

-  Group 1
-  Group 2
-  Group 3
-  Group 4
-  Group 5

### Phases

-  P2
-  P2-P4
-  P3
-  P4
-  Wards Outline

# Flint Michigan Map

Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

