

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

LANSING



May 1, 2024

TO: All Interested Citizens, Organizations, and Government Agencies

SUBJECT: FINDING OF NO SIGNIFICANT IMPACT

Oscoda Charter Township, Iosco County

Wastewater Collection & Treatment System Improvements Clean Water State Revolving Fund Project Number 5946-01

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 clean water 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 impact of the proposed alternatives in its review and approval process. A project planning document 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 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.

Finding of No Significant Impact Page 2 May 1, 2024

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 David J. Worthington, the project manager, at 517-554-1835; WorthingtonD@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 (CWSRF) Environmental Assessment Charter Township of Oscoda, losco County May 2024

PROJECT IDENTIFICATION

Applicant: Oscoda Charter Township, Iosco County

Address: 110 South State Street

Oscoda, Michigan 48750

Authorized Representative: Ms. Tammy Kline, Township Superintendent

Project No.: 5946-01

PROJECT OVERVIEW

The Charter Township of Oscoda (Oscoda) is in losco County (Figure 1) on the shore of Lake Huron. Oscoda is approximately 131 square miles and home to a now closed United States Air Force Base, Wurtsmith Air Force Base (WAFB). The land use within the city consists of residential, commercial/residential, and woodlands.

According to the United States Census Bureau's survey, Oscoda's population was approximately 7,132 persons in 2020. There has been a slight increase in population observed in recent years after the decline from closure of the WAFB, and it is assumed this small increase in population will continue for the purposes of this project proposal.

Oscoda is seeking CWSRF loan assistance to finance improvements to pump stations (PSs), manhole rehabilitation, sewer replacement and rehabilitation, and treatment for Per- and Polyfluorinated Substances (PFAS) at its wastewater lagoons. The CWSRF was able to offer Oscoda a loan for \$14,975,000 to construct the project. Oscoda has been determined by Department of Environment, Great Lakes, and Energy (EGLE) criteria to be a financially overburdened community and will be receiving loan principal forgiveness in the amount of \$7,032,500 from funds made available the Bipartisan Infrastructure Law for projects addressing emerging contaminants, as well as \$455,000 in principal loan forgiveness with funds made available by the CWSRF. Construction is scheduled to begin in fall 2024. System users could see a monthly sewer rate increase of approximately \$19.32 from the existing average usage rate of \$48.45 per month for a project of this cost. This rate increase may be considerably lower as a result of the loan forgiveness Oscoda as qualified for.

PROPOSED PROJECT

A. Project Need/Existing Facilities

Oscoda owns and maintains its own sanitary sewer system. The system includes approximately 167,000 linear feet (Ift) of gravity sewer, 57,000 lft of force main (FM) sewers, 650 manholes, 23 PSs, and a three-cell wastewater lagoon system. The PSs are a combination of duplex dry well and duplex submersible, triplex submersible, and a can grinder station. These stations have received extensive renovations from a recent CWSRF loan identified as project number 5719-01 that is nearing administrative completion.

In November 2013, Oscoda received grant funding through EGLE's Stormwater, Asset Management, and Wastewater (SAW) grant program to cover the costs of developing and implementing a Wastewater Asset Management Plan (AMP) for the township's wastewater collection and treatment system. The AMP inventoried almost the entire system and found the greatest deficiency within the Oscoda wastewater collection system was the condition of the PSs. The three-cell lagoon system also received a condition assessment as part of the AMP work. The lagoons were found to be in a good overall condition with some items that needed attention. As part of the capital improvement plan, Oscoda identified installing fine grit screening at the headworks facility to ensure reliable service to its users. This new influent screen was added in 2022 and some valves were replaced.

Most of the system was constructed between 1963 and 1977. When WAFB closed in 1993, Oscoda assumed ownership of the lagoon when the base became a part of the township. In 2004, the lagoon system became the primary treatment option as the previous treatment facility was not meeting its permit limits. Prior to being put into service, the lagoon was lined to meet current regulatory standards, an aeration system was installed, and vegetation around the basins was cleared. In 2016, additional upgrades to the treatment system included sludge removal, replacement of the aeration system and blowers, additional effluent flow metering and ferric chloride mixing equipment, reconfiguration of the piping and valves in the rapid infiltration basins and clearing of vegetation around the infiltration basins.

Many of the PS components are reaching the end of their useful life, including the PS No.25 FM. These aging stations require frequent preventative maintenance and emergency repairs. The 14-inch diameter FM from PS No.25 is aging and has had recent breaks. In addition, many stations still require integration of supervisory control and data acquisition controls for operational monitoring. Several sewer segments and manholes were televised or inspected and structural defects rating a 4 or 5 in the National Association of Sewer Service Companies Pipeline Assessment Certification Program and Manhole Assessment Certification Program were identified. Structural defects rating a 4 or 5 are the most critical ratings and need rehabilitation or replacement.

Table 1 summarizes the remaining improvements needed at some of the PSs, in the collection system, and at the treatment lagoons. These are needs identified from the AMP, as well as, for treatment, a need to protect the environment from continued contamination from PFAS in the wastewater stream. Any proposed PFAS treatment will require EGLE approval in relation to Oscoda's groundwater discharge permit.

Table 1
Wastewater Collection and Treatment System Needs

Component	Repair Needed
PS Nos.1,2,3,28	Replace Pumps
PS No.4	Replace Pumps and VFD
PS Nos.8,9	New pumps and bypass; replace piping/valves; rehab wet well
PS No.13	Pump, electrical and control upgrades; install new package PS
PS Nos.14,18,20	Upgrade electrical service
PS No.15	Demolish existing PS

Component	Repair Needed
PS No.16	Replace pump, piping, and
	valves, upgrade electrical
	service
PS No.17	Complete reconstruction of
	PS w/electrical & control
	upgrades
PS No.22	Remove PS and install new
	grinder can PS w/electrical/controls upgrades
	and FM
PS No.23	Replace pumps, rehab wet
	well/valve; install bypass
PS No.24	Remove existing PS and
	replace w/ new grinder can
	PS w/electrical/control
	upgrades and FM
PS No.25 FM	Line FM and install
	maintenance manholes
Sewer Rehabilitation	Replace or line segments per
	AMP priorities
Manhole Rehabilitation	Repair defective manholes by
_	lining or other means per AMP
WWTP/PFAS	Install Granulated Activated
	Carbon System to Treat PFAS
	in wastewater
WWTP Sludge Treatment	Remove PFAS contaminated
	sludge and dispose of at
	permitted site

B. Project Alternatives

The following alternatives were evaluated for the project.

No-action Alternative

Selecting a no-action alternative has the advantage of requiring no immediate capital investment. However, the disadvantage of no-action is that maintenance becomes more costly and inevitably failures of infrastructure will begin to occur with dire consequences. No action on the PFAS in the wastewater might become a public health threat possibly subject to enforcement action against Oscoda. This alternative is rejected.

Regional Alternative

A regional alternative was not considered as the proposed project is addressing Townshipowned assets, PSs, and the lagoon treatment system.

Analysis of Principal Alternatives

Two principal alternatives were evaluated as described below.

Alternative No. 1 – Rehabilitate or Replace PSs/Sewers/Manholes & PFAS Treatment

This option includes rehabilitation of PSs, rehabilitation of the PS No.25 FM, rehabilitation manholes, rehabilitation, or replacement of sewers, and PFAS treatment at the wastewater lagoons.

<u>Alternative No. 2 – Replace PSs/Sewers/Manholes & PFAS Treatment</u>

This alternative includes complete replacement of PSs, replacement of the PS No.25 FM, replacements of sewers and manholes, and PFAS treatment at the wastewater lagoons.

Table 2 compares the present worth of Alternatives 1 & 2.

Table 2
Present Worth Comparison— Alternatives 1 and 2

Component	Alternative 1	Alternative 2	
Initial Capital Cost	\$14,974,000	\$20,186,000	
Annual O&M Cost	\$168,889	\$194,930	
Salvage Value	\$379,394	\$1,031,634	
Present Worth of O&M	\$3,655,658	\$4,219,324	
Present Worth of Salvage Value	\$194,622	\$529,208	
Total Present Worth	\$18,435,087	\$23,876,116	

C. Selected Alternative

Oscoda selected Alternative No. 1 – Rehabilitate or Replace PSs/Sewers/Manholes and PFAS Treatment at the Wastewater Lagoons as described in Table 1 due to its overall cost-effectiveness over the 30-year term analyzed. To expand on the sewer and manhole rehabilitation projects presented in Table 1, Oscoda plans to rehabilitate 22 manholes, replace 7 segments of sanitary sewer totaling 1,872 lft, and rehabilitate 21 segments of sanitary sewer which would include cured-in-place pipelining of 3,238 lft of pipe and spot repairs. Figure 2 shows the locations of the proposed improvements.

Oscoda will finance the improvement with a \$14,975,000 30-year CWSRF loan at 2.00 percent interest. Oscoda has been determined by state criteria to be a financially overburdened community and will be receiving loan principal forgiveness in the amount of \$7,032,500 from funds made available from the Bipartisan Infrastructure Law for projects addressing emerging contaminants, as well as \$455,000 in principal loan forgiveness with funds made available by the CWSRF. The average residential user could see a monthly sewer rate increase of approximately \$19.32 from the existing average usage rate of \$48.45 per month for a project of this cost. This rate increase may be considerably lower as a result of the loan forgiveness Oscoda as qualified for.

ENVIRONMENTAL IMPACTS AND MITIGATION

A primary goal of the project is to maintain reliable wastewater service and compliance with the facility's National Pollutant Discharge Elimination System (NPDES) discharge permit. The proposed project is not anticipated to cause changes to the quality of nearby surface or groundwater. A minor impact on local traffic may occur for residents and businesses during the construction of the proposed improvements. During construction, equipment will increase local noise and dust levels during operations. There will be a short-term adverse impact on air quality during the construction phase due to dust and construction equipment emissions generated during the minimal excavation operations. Work will be contained within small areas and contractors will perform the bulk of the work on one site at a time, minimizing disturbance to residents. Technical specifications will be followed concerning noise, dust control, cleaning, and debris removal, along with local township ordinances being followed. Temporary bypass pumping to manage sewage flows may be required during construction but will be minimized to the greatest extent possible. There are no anticipated impacts to wetland or floodplains.

A. Endangered Species

The United States Fish and Wildlife Service's (USFWS) Information for Planning and Consultation (IPaC) website was consulted for any federally threatened and/or endangered species located within the project area. The IPaC and USFWS response letter identified six species, the Northern long eared bat, Tri-colored Bat, Rufa red knot, Eastern massasauga rattlesnake, Monarch Butterfly, and the Pitcher's thistle. The USFWS agrees that the project will either have "no effect" or will be "not likely to affect" these species. To ensure this is the case, Oscoda intends to implement best management practices for the rattlesnake's survival as well as limit any tree clearing activities from October to April to protect the bats.

Both the Bald eagle and Golden eagle are known to exist in the Oscoda area. Neither is a Bird of Conservation Concern but could be sensitive to development occurring during their breeding seasons. Of the two, the Bald eagle is far more likely to be encountered. Because work will be outside of sensitive habitats, neither the eagles nor several USFWS species of migratory birds of conservation concern are expected to be vulnerable to "incidental take" because of the project as currently planned.

The Michigan Natural Features Inventory (MNFI) was consulted to determine if any state recognized or endangered species could be affected by the proposed project. The MNFI response letter indicated several legally protected and/or rare natural features have been documented within 1.5 miles of the proposed project area, and that it is possible negative impacts could occur. The threatened and endangered species include the Northern long-eared bat, Little brown bat, Wood turtle, Kirtland's warbler, Eastern massasauga rattlesnake, and Pitcher's thistle. The species of special concern include the Mudpuppy, Blanding's turtle, and Grasshopper sparrow. The project is expected to impact previously disturbed areas, existing roadways, and residential lawns with no work in sensitive habitats such as wetlands, bodies of water, or sand dunes. Brush clearing will be limited and tree clearing, if any, will be outside of bat hibernation periods. Therefore, no adverse impacts are expected to state threatened, endangered or species of special concern because of the project.

Should any federally or state threatened, endangered or species of special concern be found during the construction of the project the appropriate agencies will be contacted for guidance on how to mitigate any potential adverse impacts to the identified species.

B. Historical Preservation

Both the Michigan State Historic Preservation Office (SHPO) and eight federally recognized tribal nations have been contacted regarding any historical or cultural impact that might be related to this project. The SHPO has responded that no historical properties appear to be affected within the area of potential effects for this undertaking.

No tribal responses were received by the time this environmental assessment was published. Should either historical or cultural artifacts be encountered during the project construction, work with cease immediately and the SHPO and tribes will be contacted.

C. Construction Impacts

There will be minimal disturbance to the surrounding landscape at the WWTP property. Oscoda's lagoons have been operating for decades and are removed from highly populated areas to minimize odors and aesthetic concerns. The main negative impact will be financial to pay for the loan debt service. There will be no dislocation of people during the construction. Minimal impact to residents is anticipated as the work will take place on existing township owned property or within the road right-of-way. Employment of some residents by the contractor(s) is a possibility for certain construction operations.

No indirect impact on development, land use, cultural, human, or ecological resources is anticipated.

The various infrastructure improvements will positively reduce system maintenance, reduce risk of lift station failures and/or sewage spills from defective pipes or manholes.

PUBLIC PARTICIPATION

A formal public meeting on project alternatives and user costs was held on April 24, 2023, at 6:30 pm at Shoreline Players. The public meeting was advertised in the local newspaper and on Oscoda's web site 15 days prior. A copy of the Draft Project Plan was made available to the public at the town hall and on the township website. No written comments from the public were received before, during, or after the public meeting. Questions and comments received during the meeting were addressed. After the close of the public comment period, the recommended alternative was selected for implementation by the Oscoda Township Board.

REASONS FOR CONCLUDING NO SIGNIFICANT IMPACTS

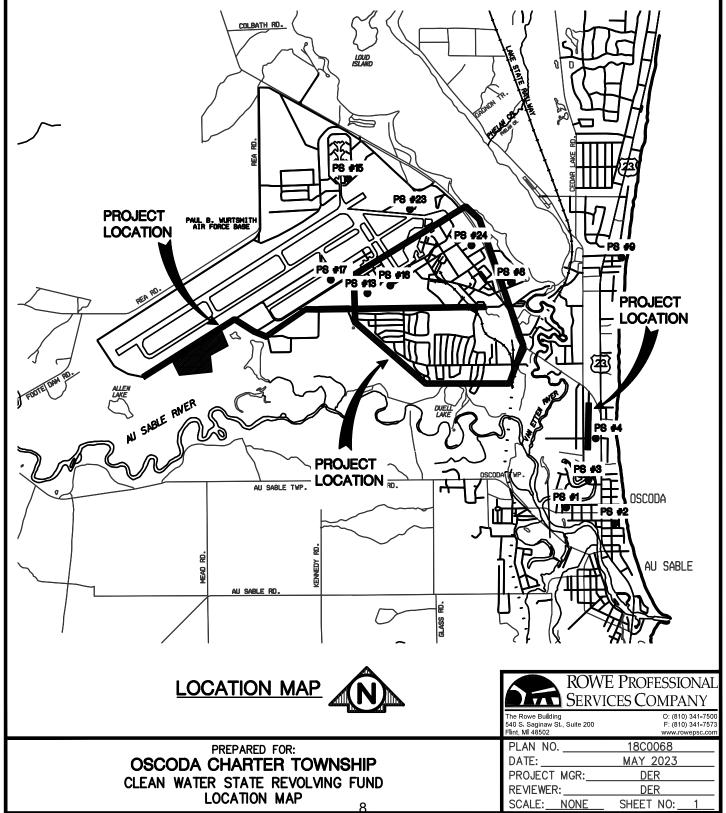
The proposed project has minimal temporary negative environmental impacts but offers substantial benefits of repairing sewage pipes, manholes, and PSs to transport wastewater safely and enabling the WWTP to provide adequate treatment of wastewater that will comply with the NPDES permit and prevent unauthorized discharges and discharge limit violations. These improvements should enable the WWTP to function efficiently.

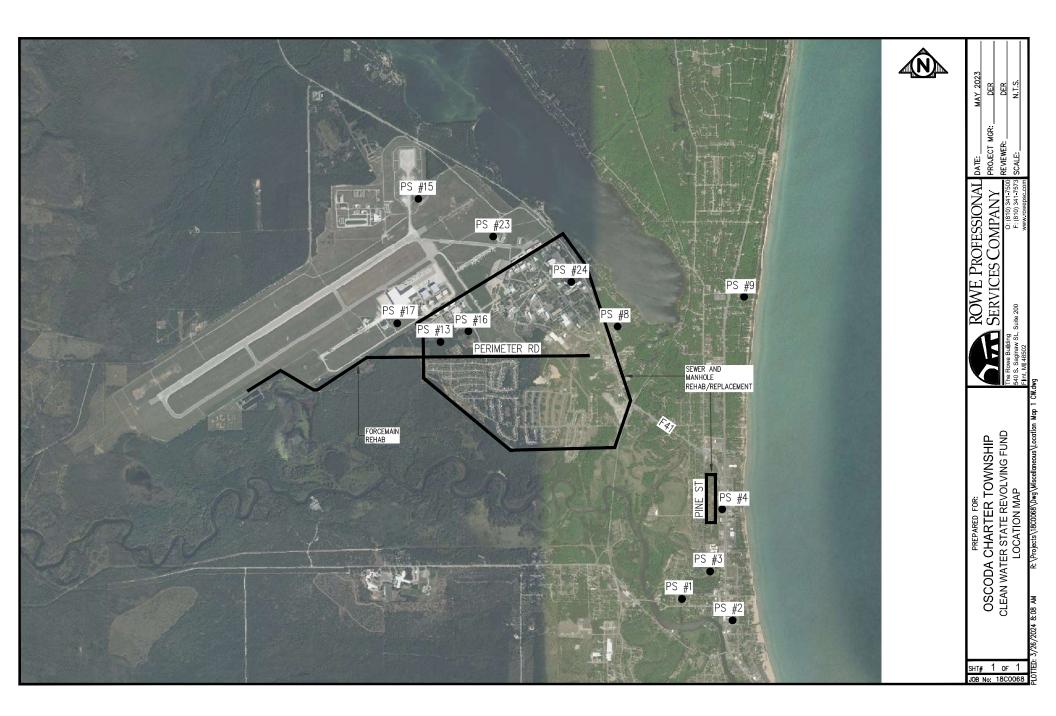
Questions regarding this Environmental Assessment should be directed to:

Mr. David J. Worthington, Project Manager
Water Infrastructure Funding and Financing Section
Finance Division
Michigan Department of Environment, Great Lakes, and Energy
P.O. Box 30457
Lansing, Michigan 48909-4957
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E-Mail: WorthingtonD@Michigan.gov

OSCODA CHARTER TOWNSHIP CLEAN WATER STATE REVOLVING FUND

T24N - R9E, SECTIONS 20, 21, 28, 39, 30, 32, 33, AND 34 T24N - 8E, SECTION 25 IOSCO COUNTY, MICHIGAN





9 FIGURE 2