



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

March 18, 2025

TO: All Interested Citizens, Organizations, and Government Agencies

SUBJECT: FINDING OF NO SIGNIFICANT IMPACT
City of Hudson, Lenawee County
Sanitary Sewer Rehabilitation
Clean Water State Revolving Fund Project Number 5862-01

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/SRF under "Environmental Project Reviews." 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 via email to EGLE-WIFFS@Michigan.gov; or to me at EGLE, FD, Constitution

Finding of No Significant Impact

Page 2

March 18, 2025

Hall, P.O. Box 30457, Lansing, Michigan 48909-7957. 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 all 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 Chelsea Walsh, the project manager, at 517-599-7218; Walshc3@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
City of Hudson, Lenawee County
Environmental Assessment
March 2025

PROJECT IDENTIFICATION

Applicant: City of Hudson

Address: 121 North Church Street
Hudson, Michigan 49247

Authorized Representative: Charles Weir, City Manager

Project Number: 5862-01

PROJECT BACKGROUND

The City of Hudson (Hudson) is a 2.2 square mile community located in Lenawee County and is surrounded by the city of Pittsford to the west and the villages of Clayton to the east and Prattville to the south (see Figure 1). According to the U.S. Census, Hudson's population totaled 2,415 people in 2020 and is projected to remain the same over the next 20 years based on American Community Survey estimates.

Hudson is applying for a Clean Water State Revolving Fund (CWSRF) loan administered by the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to finance sanitary sewer and manhole rehabilitation. This effort will address the sewer system's structural defects such as collapsed, fractured, offset, and broken pipes and manholes.

The total estimated project cost is \$805,000. The CWSRF loan will be paid back over a 20-year period. As an overburdened community as determined by EGLE, Hudson is eligible to receive a lower interest rate through the CWSRF program as well as up to \$96,600, or 12 percent of the eligible project cost, in loan principal forgiveness.

Repayment of the project financing will be from an increase in user rates. The current monthly water and sewer cost for a typical resident using 4,000 gallons/month is \$56.61 per month. To service the loan debt, Hudson anticipates an annual increase of approximately \$18.80 per year or \$1.57 per month per REU.

The project is scheduled to begin construction in Fall 2025 and is anticipated to be completed by end of December 2026.

EXISTING SYSTEM AND PROJECT NEED

Hudson owns its wastewater collection system which serves approximately 2,415 customers. The system is comprised of sanitary sewers which direct wastewater to the Hudson wastewater treatment plant (WWTP). The existing sanitary sewers are 8, 10, 15, and 18-inches in diameter and comprised of vitrified clay pipe and polyethylene vinyl chloride (PVC). The oldest portions of the collection system made of vitrified clay were constructed over 100 years ago. Portions of the collection system are beyond their useful life and require rehabilitation or replacement. Many of the associated manholes are constructed of brick and in need of repair.

Hudson's 2018 Asset Management Plan details numerous structural defects in the sanitary sewers and associated manholes that were identified during National Association of Sewer Service Companies (NASSCO) Pipeline Assessment Certification Program (PACP) and Manhole Assessment Certification Program (MACP) televising inspections. These structural defects may contribute some infiltration and inflow (I&I) in the system. Hudson's National Pollution Discharge Elimination System (NPDES) permit includes a requirement for the city to establish an I&I Reduction Program.

Repairs to the sanitary sewer and manholes are needed to improve the efficiency and restore the structural integrity of the sewer system where significant structural defects have been identified. These structural repairs could also benefit suspected areas of excessive I&I in the sanitary sewer system.

PROPOSED PROJECT

A. Potential Alternatives

No-action Alternative

No action is not a feasible alternative for addressing the immediate needs of the sewer system. Without sewer and manhole improvements, the identified structural deficiencies will go unrepaired. This likely would result in further deterioration of the sewer system. Failing to make these repairs would result in larger capital expenditures in the future.

Regional Alternative

The defects identified within the sewer system are limited to the local service area of Hudson. Therefore, regionalization is not considered viable or practical for the deficiencies evaluated in Hudson's project planning document.

Optimization of Existing System

The optimum performance of existing facilities includes primarily operational changes, the addition of new equipment, and training of operating personnel. As this alternative would not ultimately achieve the objective of repairing or rehabilitating the sanitary sewer system, this alternative was not further considered.

Rehabilitation Alternative

The rehabilitation alternative would address various segments of pipe and manholes with NASSCO PACP and MACP structural defects rated Significant (grade 4) or Most Significant (grade 5).

Hudson evaluated removing 8, 10, 15 and 18-inch diameter vitrified clay sanitary sewers and replacing them with PVC pipe of the same diameter. The manholes would be replaced using precast manholes. The 6-inch diameter publicly owned sanitary service laterals would be removed and replaced up to the right-of-way. This alternative would require excavating the affected pipe resulting in street closures and re-routing of traffic.

Hudson also evaluated spot repairing sewer locations where existing structural defects were identified. This alternative would require excavating the affected pipes in order to repair various segments. However, due to the age and deteriorated condition of the sanitary sewers and manholes, it was determined that spot repairs would not be effective since additional deterioration in other areas may occur.

Lastly, Hudson evaluated whether pipelining via the cured-in-place process (CIPP) was a feasible alternative. Lining the existing 8, 10, 15 and 18-inch diameter sanitary sewers would help maintain their capacity which is properly sized for the existing service area. Existing manholes would also be lined. Rehabilitation through lining is less disruptive as it utilizes a trenchless method of installation and does not require open excavation.

B. Selected Alternative

CIPP sewer and manhole lining was chosen as the selected alternative as it is more cost effective and will avoid some of the disruption caused by open-cut construction and excavation. Lining will also take less time than a full replacement or spot repairs. Sanitary sewer lining will take place along North Maple Grove Avenue from High School Drive to Madison Street, and along Mechanic Street (see Figure 2). An estimated 3,000 linear feet of sanitary sewer and 21 manholes will be lined. Rehabilitation will occur within or directly adjacent to pipe segments that were identified as having NASSCO structural grade ratings of 4 or 5.

The proposed lining would utilize trenchless technology within the existing right-of-way. This method will result in minimized costs as well as reduced environmental and traffic impacts.

C. Project Cost and Implementation

The estimated total cost of the project is \$805,000. The project financing along with the repayment through user rates is discussed on page 1. Construction is anticipated to being in Fall 2025 and be completed by Winter 2026.

PROJECT IMPACTS

A. Water Quality Impacts

The rehabilitation involved with this project is limited to previously disturbed areas and rights-of-way where the sanitary sewer system already exists. No excavation or earth moving activities will be required. Therefore, no wetlands, floodplains, surface waters, or rivers within Hudson will be adversely impacted by the project.

B. Construction Impacts

The proposed project involves trenchless installation of CIPP lining for sanitary sewer mains and manholes. Construction of the project will result in typical short-term impacts associated with sanitary sewer CIPP lining such as dust, construction traffic, and noise.

C. Endangered Species

According to the U.S. Fish and Wildlife Service, there are several federally endangered or threatened species within Hudson. These include the Indiana bat, Whooping crane, Copper belly water snake, Eastern Massasauga rattlesnake, and Monarch butterfly. No critical habitats have been identified. The sanitary sewer rehabilitation project will not require any excavation or in-stream work and will take place within existing rights-of-way in and previously disturbed areas. The proposed project is not anticipated to negatively impact sensitive natural features, wildlife, or ecosystems. There is no tree removal anticipated.

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 Hudson's official website on March 16, 2023. A public meeting was held on April 4, 2023. Members of the public were in attendance and requested additional information about potential rate increases related to the project. Hudson passed a resolution adopting the final project planning document on April 20, 2023.

REASONS FOR CONCLUDING NO SIGNIFICANT IMPACTS

The proposed project is expected to have a positive impact on Hudson as it will improve the reliability of the sanitary sewer system for residents and business. No adverse impacts are expected as a result of the project. Therefore, a finding of no significant impact has been made.

Questions regarding this Environmental Assessment should be directed to:

Chelsea Walsh, 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
Telephone: 517-599-7218
Email: Walshc3@Michigan.gov

Figure 1
Location of the City of Hudson

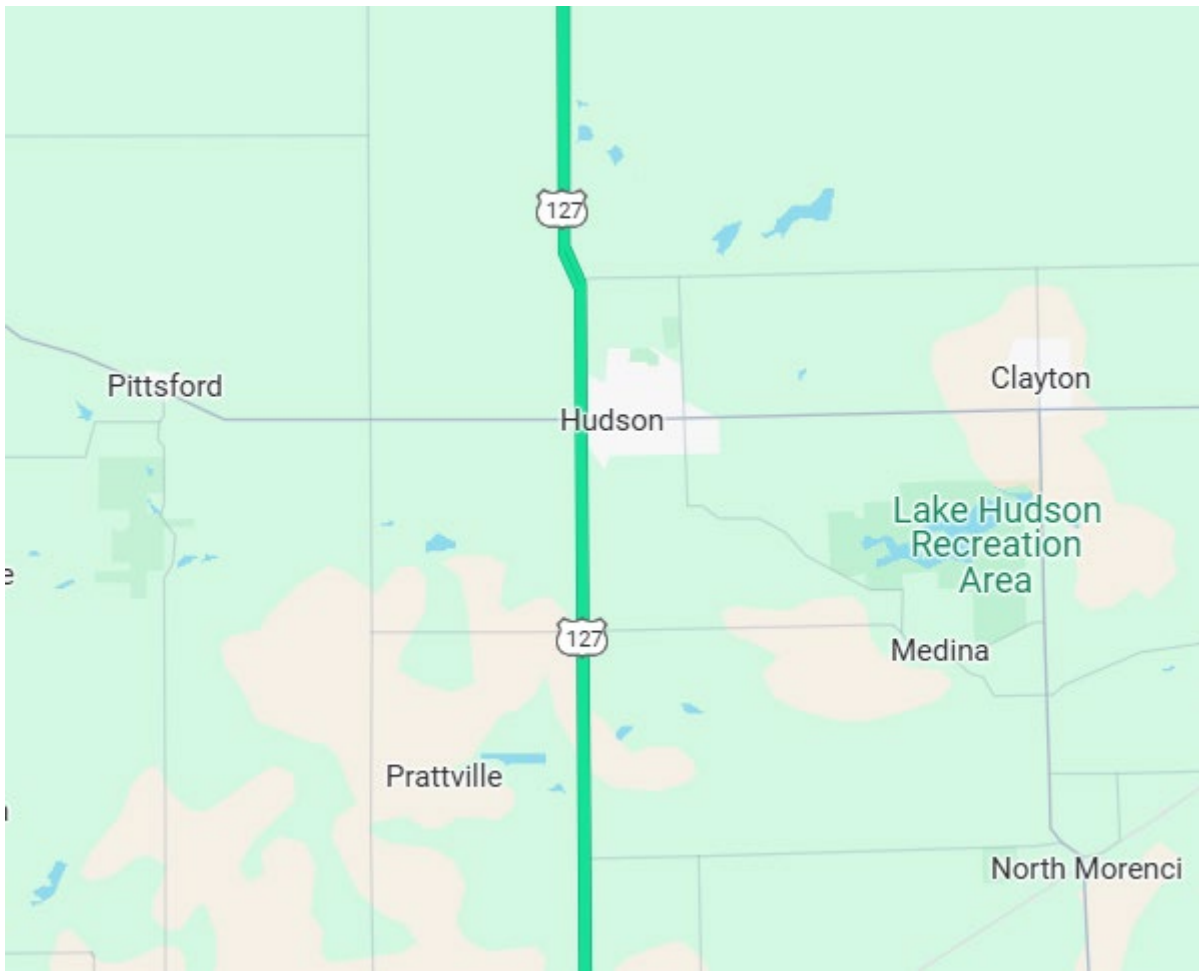
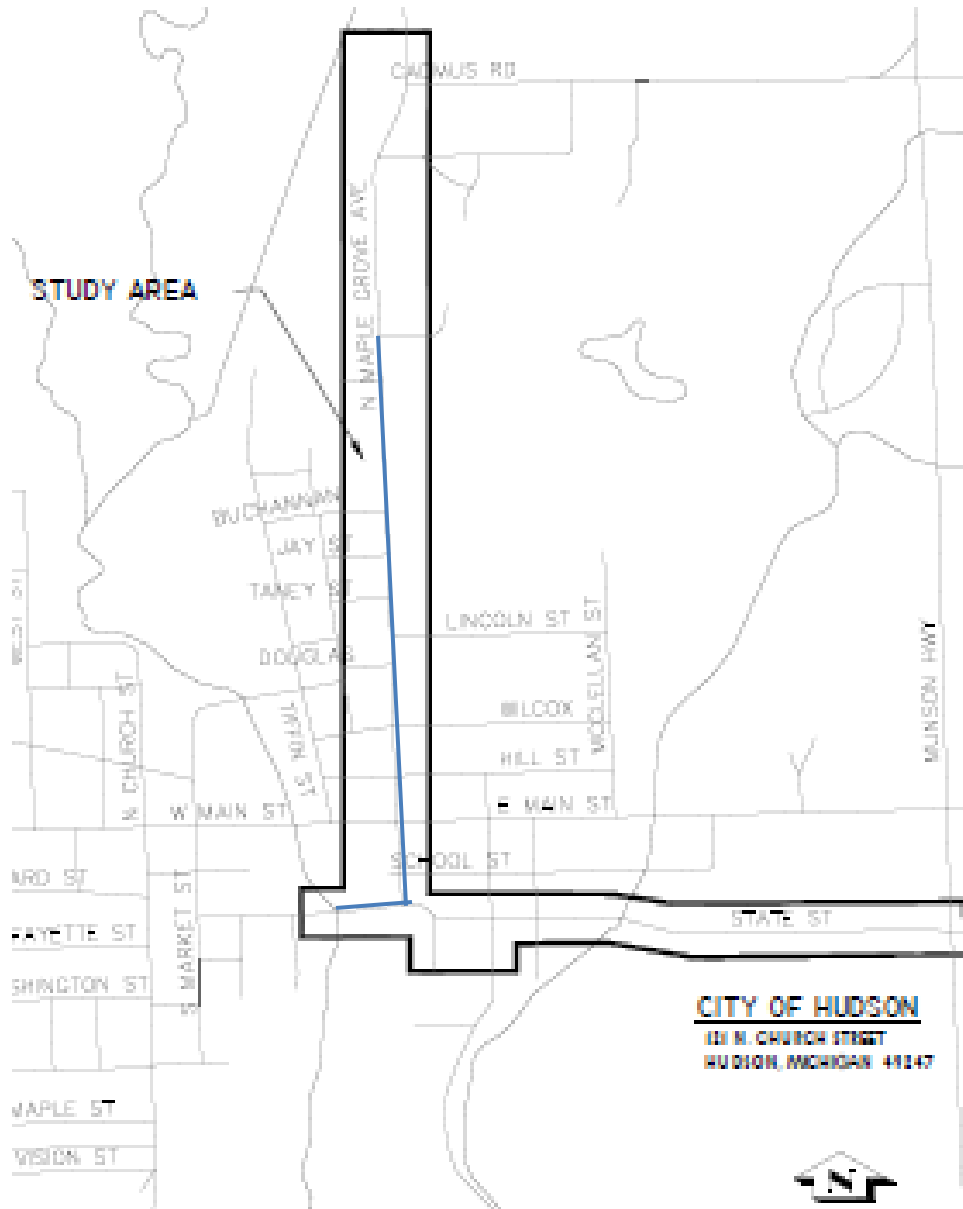


Figure 2
City of Hudson Sanitary Sewer Rehabilitation Project



— Areas where sanitary sewer and manhole lining will take place