



CITY OF FLINT

Dr. Karen W. Weaver
Mayor

March 28, 2017

Mr. Chris Korleski, Director
Water Division, Region 5
United States Environmental Protection Agency
Ralph Metcalfe Federal Building
77 West Jackson Boulevard (W-15J)
Chicago, Illinois 60604-3590

Sent via Email

Dear Mr. Korleski:

This correspondence is an update to my March 1, 2017 correspondence which addressed the *New Source Treatment Plan* (“NSTP” (60.b.iii) component of the First Amendment to the Emergency Administrative Order. My previous correspondence referenced the alternative water source evaluation which is currently in progress. This analysis of potential interim, primary and back-up water source options for Flint must consider many public health, social and economic issues before formulating a recommendation. Unfortunately, complex legal, engineering, operational and regulatory issues will result in a three week delay in the completion of this evaluation.

Based on this revised schedule, the attached “Public Participation Plan” has been modified. The City has and will continue to communicate to the public that a water source evaluation is in progress and explain the criteria being considered in the evaluation. The Public Participation Plan outlines the approach that will be used to obtain the valuable public input prior to finalizing the water source selection.

As co-responders to the Order, Mr. Bryce Feighner (Director – Drinking Water and Municipal Assistance Division, Michigan Department of Environmental Quality (MDEQ)) has reviewed this submittal on behalf of the State and concurs with the content of the document.

If you have clarifying questions and/or need additional information, please contact me at (810) 237-2035 or via email at kweaver@cityofflint.com.

Respectfully submitted,

Dr. Karen W. Weaver
Mayor

cc: Mr. Robert Kaplan, US EPA
Mr. Rich Baird, Governor's Office
Mr. Keith Creagh, MDNR
Mr. Bryce Feighner, MDEQ
Mr. Sylvester Jones, City of Flint
Mr. John Young

Attachments:
Public Participation Plan

**CITY OF FLINT
DRINKING WATER SOURCE SELECTION
PUBLIC PARTICIPATION PLAN
March 27, 2017 Revision**

Background

This Public Participation Plan has been prepared in response to the United States Environmental Protection Agency's (EPA's) November 17, 2016, First Amendment to the Emergency Administrative Order (Amended Order). Under the Amended Order, *Paragraph 60* required a submittal addressing a *New Source Treatment Plan ("NSTP" (60.b.iii)* by March 1, 2017. The Amended Order also required that, "The NSTP shall be developed in consultation with appropriate experts and the public through adequate advanced notice and opportunity for comment." This Public Participation Plan will also address the additional requirements contained in the February 21, 2017, EPA letter to Mayor Weaver; specifically:

- 1) *a description of how the public has been or will be engaged in the ongoing alternatives analysis process;*
- 2) *a description of how the public has been or will be engaged in the ultimate selection of the City's new water source(s);*
- 3) *a description of how the public has been or will be involved in any DWSRF-related public participation opportunities; and*
- 4) *the City's plan and timeline for vetting the relevant economic, social, political, and public health issues associated with the alternatives evaluation.*

In a letter dated November 30, 2016, City of Flint Mayor Karen W. Weaver informed the EPA that Flint's long-term, primary source of drinking water will be the Flint Water Treatment Plant. The back-up source of supply would be an on-site raw water reservoir supplemented with an emergency finished water interconnection with Genesee County.

The City and its federal, state and local partners have been actively engaged in communicating with the public and seeking their input throughout this Flint water event. These public engagement activities have included numerous community conversations, mailings to organizations and individual residents, press releases, publication distribution, and presentations at the Governor's Flint Water Interagency Coordinating Committee meetings and Flint City Council meetings.

Regarding *DWSRF-related public participation opportunities*, a public hearing was held on June 13, 2016, at 6 p.m., in the City of Flint Council Chambers. Rowe Professional Services Company presented the project plan including costs and alternatives related to water main improvements and service line replacements to the Flint City Council and members of the public in attendance. At the conclusion of the presentation, the hearing was opened to the public for questions and numerous residents made remarks regarding the project plan and presentation. A resolution of plan adoption was passed

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by the council on June 27, 2016 and by the Receivership Transition Advisory Board on June 29, 2016. Because meter replacement procedures and water treatment plant improvements were not discussed at the public hearing there is a requirement for those items to be included in a yet to be scheduled public hearing. By law a public hearing advertisement needs to be published 30 days prior to a hearing. However, the City will wait until the alternatives analysis is complete and the drinking water source selection is made before scheduling that hearing.

Public outreach especially pertinent to this NSTP submittal included a direct mailing from the City to residents on January 3, 2017, regarding the current drinking water quality. Among other things, this mailing informed residents that the City was consulting with experts to develop standard operating procedures, corrosion control studies and performance testing for the Flint Water Treatment Plant in accordance with the March 1, 2017, NSTP submittal requirements. Further, on January 11, 2017, the City hosted a Town Hall meeting to share the latest water quality data, future plans for treating water at the Flint Water Treatment Plant, and receive input from residents.

Subsequent to the January 11, 2017, Town Hall meeting, the City and its consultants began evaluating water source alternatives as required by the Drinking Water Revolving Fund (DWRP) process. Since more alternatives are now being evaluated than previously presented to the public, additional public input will be sought as indicated below.

Timeline

Month of March 2017 – The City’s consultants continue to gather input from potential water source providers regarding costs and technical feasibility and perform economic analyses on the alternatives.

April 5, 2017 – Meet with Flint City Council to discuss the Public Participation Plan for drinking water source selection.

Week of April 17, 2017 - Initiate the Public Participation Plan to obtain feedback on the recommended water source solution, alternatives evaluated, and the relevant economic, social, political, and public health issues associated with the alternatives evaluated. Initiate cost of service/rate design study based on recommended water source options and projected capital and operating plans associated with those options.

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April 18, 2017 – Press conference and coordinating press release to announce that Flint City leaders have received the alternatives evaluation and recommendations on the drinking water source solutions from their consultants. At the presser, the mayor/city officials/consultants will go through the primary alternatives considered and present the pros and cons of each alternative considering the related economic, social, and public health issues. The mayor would encourage residents to express their opinions regarding the alternatives via the upcoming Town Hall meeting, E-mail comment box, or in writing.

April 20, 2017 - Town Hall meeting for residents to learn about the water source alternatives evaluated and to provide input. City leaders will go through the primary alternatives considered and present the pros and cons of each alternative considering the related economic, social, and public health issues. Residents will be provided the opportunity to express their opinions and have their questions answered. Subsequent to the Town Hall meeting residents can continue to provide input via E-mail or in writing through April 30, 2017.

May 3, 2017 – City leadership meets with the Flint City Council to discuss the results of the public participation and to recommend a specific drinking water source.

May 4, 2017 – Press conference and coordinating press release to announce the City's recommended drinking water source.