

DISTRICT HEALTH DEPARTMENT NO.2



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September 30, 2018

This letter is in response to your request for support of providing municipal sewer to certain properties along US 23 in northern Au Sable Township. Our department is in support of a municipal sewer extension to serve the properties located in this area. There are a number of aging systems in this area that are likely to be in need of replacement sometime in the near future. Many of these properties will face a significant limitation, or multiple limitations during the permitting and construction process.

The parcels located in this area are generally of small size, and have a limited amount of area available for sewage disposal system (SDS) placement due to the location of existing structures, the location of the US 23 right of way which may be up to 200', and the minimum isolation requirements required by the District Health Department No. 2 (DHD2) Environmental Health Regulations (EHR) including a 10' minimum isolation from dwellings and 5' from property lines.

Residential properties are further limited in this area as they are required to maintain a minimum 50 foot isolation distance from the SDS to the ordinary high water mark of Lake Huron, 50 feet from any other surface water (e.g. lake, river, or stream) and 50 feet from ANY water well including potable, irrigation, or wells that are not currently in use.

Many commercial properties in these areas (e.g. privately-owned small businesses, resorts, and hotels and motels) may be limited even further, depending on wastewater volume generated per day in accordance with state criteria, by the requirement to maintain 100 feet from the ordinary high water mark of Lake Huron, and 100 feet from any other surface water (e.g. lake, river, or stream).

There are also 19 properties in the proposed area that are considered High Risk Erosion zones as determined by the Michigan EGLE. These properties are required to have additional setbacks for permanent structures, including SDS, ranging from 40 to 145 feet from an established erosion hazard line, which is typically located in the proximity of the ordinary high-water mark. These additional setbacks greatly limit the available area – particularly in relation to the US 23 right of way – for SDS placement.

Residential systems must maintain a two foot (2') vertical separation from the bottom of the SDS to the seasonal high ground water table elevation, and commercial systems must maintain a two foot (2') vertical separation from the bottom of the SDS to the seasonal high ground water table elevation. This requirement typically results in mounded SDS installations which require additional design practices (e.g. lift stations, grinder pumps) resulting in much higher installation costs to property owners and require a larger surface area in terms of system size on a property that already experiences significant space limitations. Some properties, for a variety of reasons, are not able to achieve this required vertical separation and must be approved with a variance or deviation or may be denied approval altogether.

Using the most current township property information, historical DHD2 information, and an observational review of the properties in the affected area by DHD2 staff, it has been determined that at least 57 % of the parcels located in this area have been found to be affected by at least one of these types of restrictions.

A municipal sewer extension in this area would: provide a reliable and consistent means of sewage disposal for property owners facing sometimes severe spatial limitations for the construction of new or replacement SDS; would prevent the necessity of SDS to be installed with variances or deviations related to size or isolation distances; and accordingly, would be protective of public and environmental health.

DHD2 is committed to offering our support of this project and appreciate the opportunity to comment on this issue. Should you have any further questions please contact me at any time.

Respectfully,

A handwritten signature in black ink, appearing to read "D. Rousseau". The signature is fluid and cursive, with a large initial "D" and a long horizontal stroke at the end.

Don Rousseau, RS
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c. Denise Bryan, MPA
c. Commissioner Jay O'Farrell
c. Commissioner Terry Dutcher