

Summary of the 2024 Administrative Compliance Agreement Between Highland Park and the Michigan Department of Environment Great Lakes and Energy

This Special Notice provides a plain-language summary of Highland Park's Administrative Compliance Agreement (ACA) with the Michigan Department of Environment, Great Lakes, and Energy (EGLE) and a compliance update. The numbering below matches the official ACA so readers can easily refer to the full document if they wish. This agreement was signed and became effective as of April 26, 2024.

The following summarizes the Compliance Program section of the ACA. Each item reflects an item and deadlines as required by the ACA.

3.1 Valve and Hydrant Program

Highland Park must continue locating, exercising, and inspecting all valves and hydrants each year. A report must be submitted to EGLE by March 31 each year summarizing:

- Total number of valves and hydrants
- How many are inoperable
- How many need repair or replacement
- How many have been repaired or replaced

This requirement continues until EGLE determines all needed water main replacements are complete.

Most recent report submitted: 3/1/25 (Revised 5/2/25)

Summary:

Item	Total	Inoperable	Needs Repair/Replacement	Repaired/ Replaced
Valves	809	46	NA	182
Hydrants	564	20	NA	139

Next report due: March 31, 2026

3.2 Annual Leak Survey

The City must complete a leak survey every year and submit a report to EGLE within 60 days. The report must list:

- All leaks found
- The planned repair method for each leak
- Updates on leaks from prior years

Most recent report submitted: 1/31/25 (Revised: 3/14/25)

Summary of findings: Some leaks will be repaired as part of upcoming water main replacement projects with construction being completed between 2025 and 2027. For other leaks, the repair schedule indicates that the repairs will be completed as funding becomes available.

Next report due: 2/5/26

3.3 Reliability Study, General Plan, Capital Improvements Plan, and Asset Management Plan

Highland Park must keep all major planning documents including the Reliability Study, General Plan, Capital Improvements Plan, and Asset Management Plans up to date. The updates must incorporate water system updates, including new water master meter(s), master meter usage data, completed water main replacements, and address comments provided by EGLE. These shall be submitted:

Due date: 12/31/25

Expected due date: 12/31/25

Expected due date: Every year afterward until water main replacements are considered complete.

3.4 Operations and Management Requirements

The City must continue to retain Metro Consulting Associates (MCA) or another EGLE-approved operator for water and sewer operations. MCA or the approved entity must:

- Run day-to-day water and sewer operations
- Employ certified operators as required by law
- Manage billing, maintenance, lead service line replacements, and water main replacement activities

If MCA stops providing services, the City must propose a replacement within 30 days.

3.5 Independent Rate Study

Each year by September 1, the City must hire an independent rate analyst to:

- Calculate needed water and sewer rates
- Recommend adjustments
- Ensure the budget covers GLWA charges and operating costs

The City must then:

- Provide EGLE with the analyst's report
- Adopt rates that include recommended adjustments
- Report the date the new rates take effect

Most recent completion: 7/18/25

Link to rate structure: [Water and Sewer Rates 2025](#)

3.6 GLWA Payment Requirements

The City must pay GLWA in full each month for water and sewer services. Every six months, the City must submit a summary of payments to EGLE.

Most recent summary submitted: 11/7/25

3.7-3.8 Water Master Meters

Within 30 days of the ACA effective date, the City submitted a proposal to install water master meters at all connection points between Highland Park and GLWA. EGLE approved the proposal.

The City must:

- Give contractors and agencies access to meter installation sites
- Install the meters
- Ensure meters are fully operational

Project completed: 10/17/25

3.9 Annual Water Main and Lead Service Line Replacement Proposal

Each year by November 30, the City must submit a proposal listing:

- Planned water main and LSL replacement projects
- Locations and rationale
- Costs and schedules
- Required permit timelines and documentation

Most recent proposal submitted: 11/26/25

Next proposal due: November 30, 2026

Summary Table of ACA Requirements and Status

ACA Item	Plain Language Description	Status	Date Current Report Completed	Date Next Report Due
3.1	Annual valve & hydrant inspections and reporting	Ongoing	5/2/25	3/31/26
3.2	Annual leak survey and repair schedule	Ongoing	3/14/25	2/5/26
3.3	Updated planning documents (Reliability, General Plan, CIP, Asset Management)	Ongoing	NA	12/31/25
3.4	Operation by MCA or EGLE-approved entity	Ongoing	NA	NA
3.5	Annual independent rate analysis and confirmation of adopted rates	Ongoing	7/18/25	NA
3.6	Semi-annual GLWA payment summaries	Ongoing	11/7/25	NA
3.7-3.8	Water master meter installation and reporting	Complete	10/17/25	NA
3.9	Annual proposal for water main and LSL replacement	Ongoing	11/26/25	11/30/26
3.10	Change order requests for delays or cost changes	Ongoing	NA	NA
3.11	TMF study and water supply alternatives analysis	Ongoing	NA	NA

Full Administrative Compliance Agreement: [Settlement Agreement and Mutual Release: Compliance Agreement \(Page 15 to 36\)](#)

This plain-language summary and status update is intended to help residents understand Highland Park's obligations under the ACA and to provide transparency on the City's progress toward compliance.