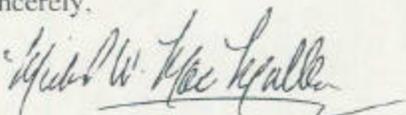


impacts (directly and indirectly associated with project implementation). Section 404(b)(1) of the Clean Water Act requires that wetland impacts be avoided unless no practicable alternative exists. If no practicable alternatives can avoid impacts to wetlands, then the EA should substantiate this. In addition, there should be a detailed description of all other possible impacts caused by the alternatives (e.g., air pollution, relocations, affects on cultural resources, induced development).

5. The EA should describe possible impacts caused by stormwater runoff (e.g., wetland pollution). The EA should quantify any extra volume of stormwater expected to be generated by the alternatives.
6. Mitigation for unavoidable wetland losses should be discussed in the DEIS. These losses should be compensated for at the appropriate amount of compensatory wetlands per each acre of naturally occurring wetlands impacted by the project. Compensatory wetlands should be designed to replicate as closely as possible the specific mix of types, functions and values provided by the project-impacted wetlands. The compensatory wetland should be established via the process of restoration to the extent feasible, and they should be located in an area as close as possible to the project-impacted wetlands.
7. The EA should give a mitigation strategy for any other impacts caused by the alternatives (if possible). This may include the implementation of stormwater detention basins, construction of habitat for affected endangered species, etc.

Thank you for the opportunity to comment on the scoping documents. We look forward to reviewing the associated EA. If you have any questions, please call Newton Ellens, of my staff, at 312-353-5562.

Sincerely,


for Shirley Mitchell, Deputy Director
Office of Strategic Environmental Analysis

cc: Ted Stone
Technical Vice President
The Corradino Group



JOHN ENGLER, Governor

DEPARTMENT OF ENVIRONMENTAL QUALITY*"Better Service for a Better Environment"*

HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

INTERNET: www.deq.state.mi.us

RUSSELL J. HARDING, Director

REPLY TO:

LAND & WATER MANAGEMENT DIVISION
PO BOX 30458
LANSING MI 48909-7958

November 30, 2000

Mr. Ted Stone
The Corradino Group
First Trust Centre, Suite 300 North
200 S. Fifth Street
Louisville, Kentucky 40202

SUBJECT: Review of the Scoping Document for the M-15 Improvement Project in Oakland and Genesee Counties

Dear Mr. Stone:

Thank you for the opportunity to review and comment on the above referenced scoping document. The document identifies potential alternatives to improve the flow of traffic along the M-15 corridor between I-75 and I-69 (a 20-mile stretch). We have reviewed the document under the authority of Part 303, Wetland Protection, Part 301, Inland Lakes and Streams, and the State's Floodplain Regulatory Authority, Part 31, Water Resources Protection of the Natural Resources and Environmental Protection Act, 1994, PA 451 as amended (Part 303, Part 301, Part 31 respectively) and have the following comments at this time:

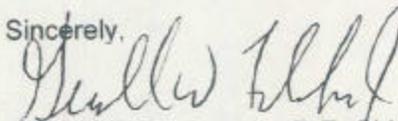
- 1) A purpose and need statement needs to be developed for the project.
- 2) Pages 6 and 9 of the document indicate that a four-lane road may meet the projected traffic needs. Page 6, Section 2.3 states, "...at volumes of 17,000 or more, four-lane roads of some type are preferred". There was no indication of the projected traffic volume that would necessitate a five-lane road. Page 9, Section 3.5 states, "Traffic projections indicate a need for two through lanes of travel in each direction." Because of the potentially large amount of wetland impacts (up to 24 acres) we request that a four-lane road be evaluated as a potential alternative. At a minimum, a four-lane section through the wetland, lake and stream areas in combination with another alternative should be evaluated in order to minimize potential wetland impacts.
- 3) Under Part 303, all feasible and prudent alternatives should be used to avoid wetland impacts. If the wetland cannot be avoided, all practicable means to minimize impacts to wetlands must be used. Such means would include obtaining design exemptions where practicable through wetland areas. This would also include minimizing road and shoulder widths, minimizing the amount of grade lift, spanning wetland areas, and using guard rail and steeper side slopes through wetlands. If wetlands are impacted, then mitigation must be provided. The mitigation shall be of similar ecological type as the impacted wetland where feasible and practicable. The following mitigation ratios would be expected: 5 to 1 for rare or imperiled wetlands, 2 to 1 for forested wetland and those wetlands that border an inland lake, 1.5 to 1 for scrub shrub and emergent wetlands. Mitigation shall be provided on site where it is practicable and beneficial to the wetland resources. If it is not practical to provide on site mitigation, then it shall be provided in the immediate vicinity (same watershed). The restoration of previously existing wetlands is preferred over the creation of new wetlands

where none previously existed. An acceptable mitigation and monitoring plan must be submitted and approved by the Michigan Department of Environmental Quality (MDEQ). The plan must include a description of the botanical composition of the impacted wetlands, their functions and values, and performance criteria used to monitor the progress and success of the mitigation site. Unless a concurrent schedule is agreed upon, the mitigation activities shall be completed before other permitted activities begin. A conservation easement must be submitted that provides for the permanent protection of the natural resource functions and values of the mitigation site.

- 4) It was indicated at the scoping meeting that there maybe a fen wetland area adjacent to the existing M-15 roadway. All feasible and practical measures should be taken to avoid and minimize potential impacts to this wetland.
- 5) Under Part 31, any new or replacement structures on streams or drains with a drainage area of 2 square miles or more, must be evaluated hydraulically to ensure that the proposal does not cause a harmful interference. In addition, compensating cut must be provide for any fill (in excess of 300 cubic yards) placed below the 100-year floodplain elevation.
- 6) Under Part 301, it is preferred that any new or replacement structures be designed such that at a minimum it spans the base flow channel of the stream or drain. Extra spans should be provided if there is evidence that the adjacent floodplain/wetland corridor is used for wildlife passage. Projects must be designed to ensure that sediment does not enter any watercourse as a result of any construction activities associated with the project. It is preferred that all runoff from bridge or culvert sections flow through vegetated areas before entering a waterbody. The use of curb sections over stream crossings should be used where possible to eliminate any direct runoff to the watercourse.
- 7) If there are contaminated sites in the project area then Compliance with Part 201, Environmental Remediation, and Part 213, Leaking Underground Storage Tanks of Act 451 is also necessary. Copies of the Environmental Assessment should be provided to the MDEQ's Environmental Response Division and the Storage Tank Division.

Our review and approval of this project will be contingent upon compliance with Parts 31, 301 and 303 of Act 451 and confirmation of a wetland delineation. Thank you for the opportunity to review and comment on this scoping document. If you have any questions or if I can be of assistance please contact Mr. Alex Sanchez at 517-335-3473 or you may contact me.

Sincerely,



Gerald W. Fulcher, Jr., P.E. Chief
Transportation and Flood Hazard Management Unit
Land and Water Management Division
517-335-3172

cc: Mr. Craig Czamecki, U. S. Fish and Wildlife Service
Mr. Jim Kirschensteiner, U. S. Federal Highway Administration
Ms. Sherry Kamke, U. S. Environmental Protection Agency
Mr. Gary Mannesto, U. S. Army Corps of Engineers
Mr. Ron Kinney, MDOT
Ms. Peg Bostwick, MDEQ
Ms. Mary Vanderlaan, MDEQ
Mr. Gary Marx, MDEQ
Mr. Alex Sanchez, MDEQ

SEMCOG

Southeast Michigan Council of Governments
660 Plaza Drive, Suite 1900
Detroit, Michigan 48226
(313) 961-4266
FAX (313) 961-4869

FAX TRANSMITTAL SHEET

Please deliver this Fax to: Ted Stone, (502-587-2636)

At: Corradino Group

From: Tom Bruff, ext. 256

Date: December 1, 2000

We are sending 3 pages including this cover page. If you have any problems, or do not receive the whole transmission, please call me at (313) 961-4266. Thanks.

Comments:

Attached are some minor corrections for the report. Also we anticipate that additional information will be needed about mitigation of the wetlands loss, storm water management, etc.. Most likely an EA will need to be performed particularly for the wetlands.

Thanks, if you have any questions regarding my comments please call me.

Visit Us Online at www.semco.org

2. *Planning Basis and Need*

2.1 Land Use and Development

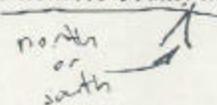
The Michigan Department of Transportation (MDOT) developed a "Preliminary Project Statement" in 1995 that first addressed congestion in the corridor. That study found that in the previous decade, traffic volumes on M-15 in Oakland County had increased at up to seven percent per year. Population projections indicated that such growth would continue in the area placing continuing pressure on M-15. Safety analysis performed at that time concluded that the accident experience reflected a roadway with capacity and turning movement deficiencies. Traffic volume growth in the Genesee County portion of the corridor was found to be more moderate, but new housing projects were underway, with the expectation of more to come. The findings of the Preliminary Project Statement are summarized below.

- Existing and forecast travel indicated a need for construction of a five-lane section in Oakland County, with a boulevard be considered as an alternative.
- A feasibility study and a corridor management study should be initiated.
- Local roadway development on the part of Oakland County and the affected townships should be encouraged to provide alternative north-south routes for local circulation. Most of those routes that offer parallel service to M-15 are gravel roads.

Since the time of MDOT's Preliminary Project Statement, traffic demand has continued to grow. And, the growth in Genesee County has increased to the point that projected travel demand now demonstrates a need for four travel lanes on M-15 in that county, as well as in Oakland County. No other state or federal routes connect with M-15 in the project area. The closest parallel state or federal roads are M-24, which is approximately 10 miles (16 km) to the east and M-54 which is approximately 7 miles (11.5 km) to the west. M-15 is not part of the National Highway System, but it is part of the Surface Transportation Program.

The most recent federal legislation relating to transportation is the Transportation Equity Act for the 21st Century (TEA21). M-15 is listed as a "high priority project" in Section 1602 of TEA21. TEA21 provided \$500,000 in funding for operational improvements on M-15 from I-75 north to the Genesee County line.

north
or
south



The Village of Goodrich in its State Road/M-15 Corridor Plan dated April 1999 stated that additional work is necessary to improve access management along the corridor. Brandon Township and the Village of Ortonville have requested that capacity and other operational improvements be made to M-15.

Land use along M-15 in Oakland County is predominately single-family residential with lot sizes ranging from one to 2.4 acres in the east, 2.5 to 4.9 acres in the central to up to 10 acres or greater in the west. Commercial and industrial zoning on M-15 is located around Ortonville and the southern corridor boundary. Sewers do not serve Northern Oakland County along M-15, which limits the density of development.

Land use in Genesee County along M-15 is mostly residential, ranging from suburban to urban. Commercial zoning is located at the northern boundary of the corridor and in the Village of Goodrich along M-15. Within one mile of M-15 there is also land zoned for recreational/conservation and residential/agricultural uses. Many wetlands and small lakes also lie in the corridor in both counties.

The study area is expected to see a high level of population growth in the future. Oakland is one of the fastest growing counties in Michigan. From 1980 to 1990 its population grew almost seven percent while the State of Michigan only grew 0.36 percent. The ~~Southeast~~^{Southeast} Michigan Council of Governments (SEMCOG) projects that the townships surrounding the Oakland County portion of the corridor will be urbanized by the year 2010. Brandon Township grew from 9,526 to 12,051 (26.5%) from 1980 to 1990. Independence Township grew from 21,537 to 24,722 (14.8%) from 1980 to 1990. The areas around the portion of the M-15 corridor in Genesee County are also growing. Davison Township grew from 13,708 to 14,671 (7.0%) from 1980 to 1990. The Village of Goodrich grew from 795 to 916 (15.2%) in the same 10-year period. These trends indicate the need to study improving highway capacity in the corridor.

MDOT's 1995 M-15 report called for a major reconstruction of M-15, some widening, vertical alignment improvement, improved drainage and ditching, roadside control islands and tree cutting and trimming. It also stated that there was a need for bridge repair, improvement to slopes and sight distances. Discussions with engineers indicate that, with reconstruction, the entire roadway base will need to be replaced. Road resurfacing was completed in Genesee County in 1999 and is currently underway on M-15 in Oakland County.

22 Accidents

Safety has always been an important issue in the corridor. Both Ortonville (45 mph) and Goodrich (40 mph) have speed restrictions. Horizontal and vertical curve sections also limit overall travel speed. Sight distance limitations, congested intersections and frequent driveway entrances contribute to "friction" and potential conflicts along the roadway. As congestion increases there are fewer chances to pass slower vehicles, which then set overall travel speeds. Furthermore, MDOT's Sufficiency Report indicates nearly four miles (6 km) of the rural segment of M-15 has sight restrictions that prohibit passing. If M-15 in Ortonville and Goodrich is excluded, nearly 22 percent of M-15 has passing sight restrictions. This is one factor that contributes to the safety and capacity deficiencies of this road.